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Public hearing with D. Laboureix, Chair of the Single Resolution Board

Banking Union Scrutiny

This briefing has been prepared for the public hearing with the Chair of the Single Resolution Board (SRB), Dominique Laboureix, scheduled for 4 December 2023.

This briefing addresses:

- *Report on smaller banks*
- *Updated resolvability assessment*
- *SRB study on CMDI reform impact*
- *Court confirmed the SRB's treatment of Banco Popular shareholders and creditors*
- *Review of three external papers "Do "white knights" make excessive profits in bank resolution?"*
- *Liquidity in resolution*
- *Update on the SRB's strategic review and the 2024 work programme*
- *MREL dashboard Q1 2023*

The SRB's Report on smaller banks

In October, the SRB published for the **first time a report on resolution planning and crisis management for smaller banks**, known as less significant institutions (LSIs).

In total, there are approximately 2000 small banks in the 21 participating Member States, which are mostly savings or cooperative banks. In terms of regional distribution, there is a **strong concentration** of LSIs in just three Member states (see also figure 1): Germany in particular accounts for approximately 60% of all LSIs, Austria for another 17%, and Italy, in third place, for 6% (relevant developments in the LSI sector are also portrayed in the ECB's 2022 LSI supervision report, which notes a **continued consolidation trend**, albeit at a slower pace than in previous years. Between 2014 and 2021, the number of LSIs has fallen by

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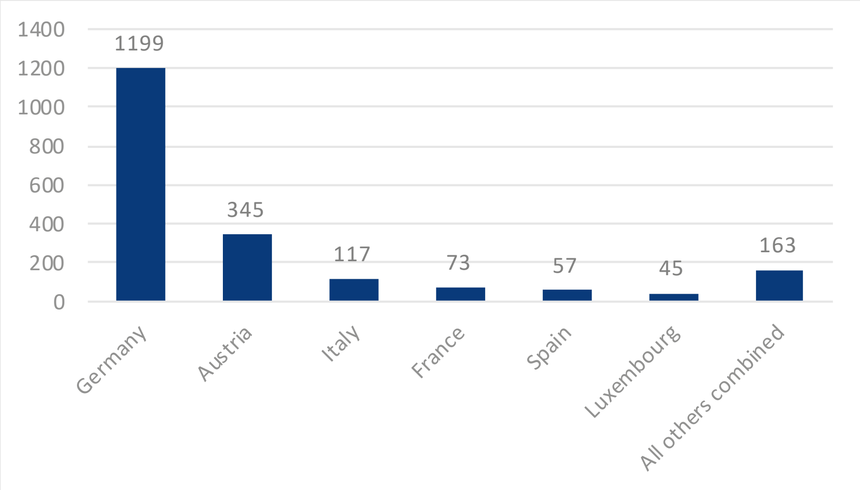
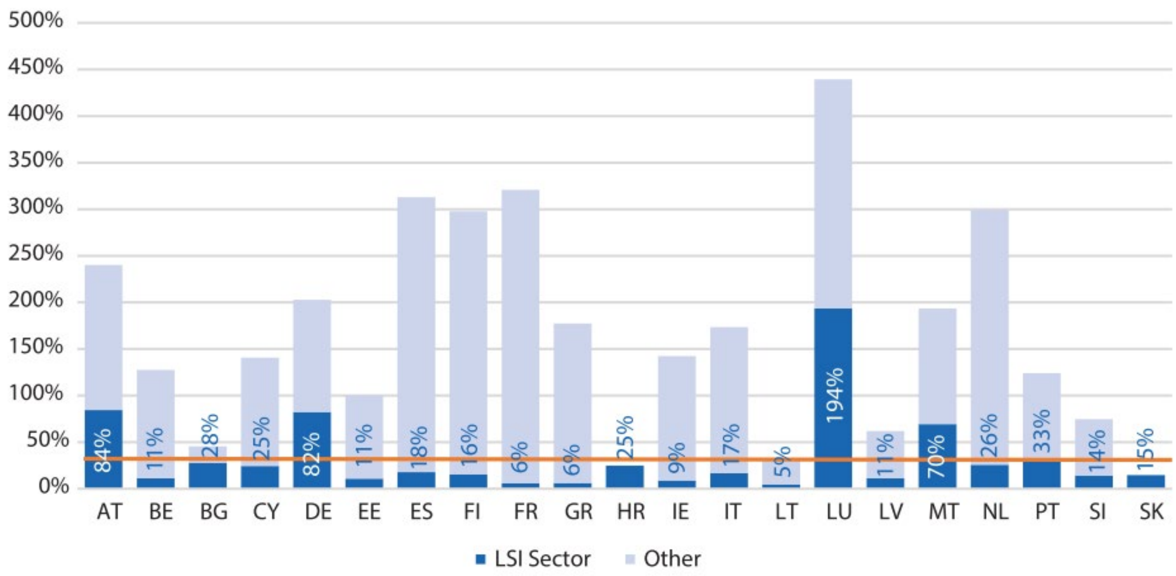
approximately 1/3. The market share of the LSI sector, however, was not affected by that consolidation: The ECB reports that the continuous growth in average LSI assets resulted in a comparatively **stable market share** of 18% of total banking assets in the euro area over the same time period).

Figure 1: Geographical concentration of LSIs (absolute numbers, in 2022)



The **relevance of the LSI sector**, when compared to the national gross domestic product (GDP), is highest in Luxembourg, that due to the financial orientation of its economy has the highest exposure to the banking sector anyway, but it also relevant in Austria, Germany, and Malta (see figure 2).

Figure 2: Relevance of the LSI sector and other banking sector compared to national GDP



Source: [SRB's report on resolution planning and crisis management for smaller banks]

In terms of the **sector's structure**, about **three quarters** of the LSIs **belong to** several cooperative and savings banks **networks**. In terms of **market share** in the banking sector, these networks play an important role on some national markets; the SRB's report sets out that cooperative banks in Austria, for example, have a 39% market share (measured by total assets held), and that savings and cooperative banks in Germany have a 28% and 18% national market share respectively.

However, these networks are **not prudentially consolidated** (also see box 1). For this reason, from a resolution perspective, resolution planning, including the public interest assessment (PIA), and **resolvability assessments are performed individually** at the level of each institution in the network.

Box 1: Specifics of networks from a resolution planning perspective according to the SRB's report on smaller banks (emphasis added)

"In savings banks in Germany, as well as cooperative banks in Austria, Italy's South Tyrol and Spain, all parts of the network are considered stand-alone institutions; there is no consolidated accounting and all of them are treated individually from a supervisory and resolution perspective. All these networks have an institutional protection scheme (IPS), which provides contractual or statutory liability arrangements to protect its members from liquidity and solvency crises. ***By law****, IPS members have access to some of the* ***benefits applicable to consolidated groups****, such as the* ***own funds waivers*** *provided for in Articles 49(3) and 113(7) CRR, the* ***liquidity waivers*** *under Article 8(4) of the CRR and benefits concerning* ***high exposure limits*** *under Article 395(1) CRR. In addition, three of the IPSs – the Austrian and German cooperative banks and the German savings banks networks – are also recognised as statutory deposit guarantee schemes (DGS) arrangements under the DGS Directive.* ***In terms of resolution planning****, every member is considered on a* ***stand-alone basis****, and individual external MREL targets are set for all the network members."*

From a **resolution planning** perspective, LSIs fall under the direct responsibility of national resolution authorities (NRAs), while the **SRB has an oversight role**. Nearly all LSIs were reported to be already part of resolution planning (97% in the latest planning cycle), the SRB expects that full coverage will be reached soon.

In the 2022 planning cycle, the vast majority of LSIs in 19 participating Member States are **eligible for "simplified obligations"** for resolution planning and have **liquidation as preferred strategy** in case of failure (96% of those LSIs have a liquidation strategy). In comparison, the number of LSIs with a resolution strategy is quite small: In the 2022 planning cycle, 17 NRAs earmarked just 68 LSIs for resolution, in nearly all of the cases based on **financial stability considerations**, due to economic importance and the risk of direct or indirect contagion. In that context, the SRB's report on smaller banks sets out that among those **LSIs earmarked for resolution, there is great heterogeneity** in terms of their size in relation to national GDP, not disclosing, though, which Member states have the highest exposure to LSIs earmarked for resolution. In any case, no resolution plan in the 2022 planning cycle noted substantive **impediments to resolvability** for any of those LSIs.

The SRB's report on small bank resolution planning furthermore mentions that in the 2022 planning cycle, **all NRAs combined devoted 91 full-time equivalents** (FTEs) to LSI resolution planning, which is **a comparatively small number** if compared to the headcount at the SRB itself (the SRB's actual staff at year-end 2022, Grand total, amounted to 427 FTEs according to the SRB's Annual report).

As regards crisis preparedness, the SRB warns in its report on smaller banks that, going forward, the current macroeconomic situation can pose **challenges** for some LSIs, in particular for those that are **vulnerable to interest rate risk**. LSIs' **reliance on non-covered deposits** as source of funding represents another point to monitor, considering also the increased potential mobility of deposits due to the widening use of social media and further digitalisation across the entire LSI sector.

The SRB's second resolvability assessment

Following a critical Special report by the European Court of Auditors (ECA) that was published in early 2021, the SRB came out with its first assessment of **banks' resolvability** one and a half years later, in July 2022. Deficits regarding the legally required assessment of resolvability (see Box 2) had been a particular **point of concern for the auditors**. At the time, the ECA's Special report provided several examples of requirements in the Single Rulebook that had not been met in resolution plans analysed by ECA auditors. As regards the required resolvability assessment, the ECA for example noted: "*Three out of six plans did not contain a clear statement as to whether the bank was resolvable or not at the time concerned.*" The ECA hence recommended that the SRB should comply with the Single Rulebook by determining substantive impediments to resolvability in each resolution plan and follow due process for their removal; the SRB accepted that recommendation.

When the SRB published its first assessment in 2022, it reported good progress, especially for larger banks.

In September 2023, the SRB in any case published **its second assessment of banks' resolvability** across the Banking Union.

We find, however, that the SRB's second assessment of banks' resolvability **lacks clearance on the key issue**, namely as to whether it considers all banks under its remit fully resolvable or not, and in the case of the latter, how many banks it considers not yet fully resolvable. The SRB could also be clearer in its resolvability report as to whether all resolution plans that it has adopted are now in line with the legal requirements, namely whether they all include a detailed description of the SRB's assessment of resolvability, with a description of substantive impediments to resolvability, if applicable, as demanded by the ECA.

We conclude from the following statement in that report **that at present, not all banks under the SRB's remit are fully resolvable,** but we concede that the SRB's wording leaves room for interpretation**:**

*"In 2023, **banks are expected to work on closing the main remaining gaps** to support resolvability. This means that banks need to meet their final MREL target and demonstrate that they have covered any **outstanding material gaps**. At the end of the transition period, the SRB will review whether any shortcomings remain. Depending on the materiality of any identified impediments to resolvability, the SRB will take proportionate action, including the launch of an impediments procedure." (emphasis added)*

Box 2: Quotes from the ECA Special report 01/2021: Resolution planning in the SRM

A resolution plan *is a comprehensive document that should, among other things, detail the bank's characteristics, determine its critical functions, identify and address any impediments to its resolvability, and set the bank's MREL. It* ***should reach a conclusion*** *on (i) the preferred resolution strategy, i.e. whether the bank should be wound up under national insolvency law, or apply for resolution, and (ii)* ***whether the bank is resolvable*** *(i.e. safe to fail). ...*

[The Single Rulebook] requires a clear conclusion as to whether a bank is resolvable (...) which requires prior determination of substantive impediments, if any. This is confirmed by a 2018 EBA decision, which states that identifying potential impediments without determining whether they are substantive, is not in line with the Single Rulebook. The EBA concluded that ***any resolution plan adopted must include a detailed description of the assessment of resolvability****. That detailed description must include any identified substantive impediments to resolvability. ...*

As a result of the step-by-step process chosen by the SRB which led to the non-determination of substantive impediments, the SRB has not yet submitted any notifications to the EBA (...) and the [National Resolution Authorities] have ***not submitted any notifications regarding the less significant institutions****.*

SRB's study of CMDI impact

At the request of the EU Council, the SRB did a study on the impact of the Commission's CMDI proposal, separate from the Commission's impact assessment. The results of the study were presented in October to a Council Working Group and at a public event (see the second of the three presentations in this file).

The **extended public interest assessment,** which intends to achieve that more failed banks go into resolution rather than insolvency. The SRB assessed a *sample of 204 banks*, of which 92 are in the SRB's remit and the remainder are less significant institutions in the remit of national authorities. **Of those banks, 62 are currently earmarked for liquidation and the SRB concludes 26 out of 62 would rather be subject to resolution instead under the proposed regime.**

To get to this result, the SRB assumed in particular:

- The new resolution objective of depositor protection means that **when depositors would suffer losses in insolvency *and* if resolution is cheaper for the deposit guarantee scheme (DGS) than insolvency, the bank will be resolved**. The SRB apparently interprets the proposed Article 31(2)(d) ("protect depositors, while minimising losses for deposit guarantee schemes") to mean that resolution authorities should pursue broad depositor protection (i.e. beyond those insured by the DGS) only if this is also the better solution for DGS, financially. **Accordingly, if broad depositor protection is desirable from a policy perspective but more expensive for the DGS, the bank would have to be put in insolvency**, and the depositor issue would be left to national instances other than the resolution authority. The SRB's presentation does not elaborate how likely this scenario would be, however. The SRB's interpretation is remarkable since one might alternatively argue that if insolvency does not achieve the resolution of depositor protection at all, it matters less if the side condition of minimising the cost for the DGS is fulfilled; *nota bene* that the SRB's assessment should not reflect State aid in insolvency.
- Banks with **high market shares at *regional* level** rather than *national* level would be resolved in accordance with the proposal; the presentation does not further elaborate how the notion of "region" has been interpreted to this end.

As to **funding of resolution measures**, the SRB finds that 47 banks already today earmarked for resolution could not receive funding from the resolution without bailing in (some) deposits (because the minimum bail-in for this purpose of 8% of liabilities would not be reached, otherwise). Since the proposed reform will not have been implemented for some time, a first question that comes to mind is how these banks would be treated today, i.e. if the resolution authorities (17 are in the SRB remit, 30 in national resolution authority remit) would actually proceed with resolution and bail in depositors. Of the above-mentioned 26 new resolution candidates, another 19 would also require depositors to be bailed in.

Under the proposed new regime, funding from the DGS would be used, avoiding the bail-in of depositors, provided that resolution is cheaper for the DGS than insolvency (the "least cost test"). The reform alleviates this least cost test by making the DGS bear more losses in insolvency (see our briefing for more detail). First, it is noteworthy that only 36 of the 47 banks *currently earmarked for resolution* fulfil this alleviated least cost test, according to the SRB. Out of the 26 new resolution candidates, only 19 do. Accordingly, also after the reform, **there would still be banks that law requires to be resolved, but for which there are insufficient funding means available if the objective is to protect all depositors**. The CMDI accentuates the situation somewhat compared to the status quo since broad depositor protection becomes a resolution objective. It would be interesting to learn from the SRB how it would handle such cases, going forward.

The SRB's discussion then turns to the **potential impact of the reform on the DGSs. It finds it "limited",** as the median resolution case among the current resolution candidates would require a contribution from the DGS amounting to 15% of its available financial means, or 3.7% for the new candidates. Nevertheless, the SRB does not conceal that there are also "two to three outliers" that apparently require much higher contributions; the average contribution for current resolution candidates amounts to 40% of available financial means. For the banks that go into insolvency, the SRB finds average additional costs for the DGS due to the reform (basically, the collateral damage of the changes meant to alleviate the least cost test for the resolution candidates) of 5% of the available financial means, which the SRB calls manageable.

Clearly all the **findings of the SRB's study rely on a number of assumptions**, notably on the losses up to the point of resolution and the asset values that can be realised in resolution and insolvency, respectively. We understand that the SRB has applied the same assumptions to all cases, while it might be desirable to study a range of scenarios instead to understand how robust the findings are to changes in the assumptions. The SRB does not elaborate how the chosen assumptions compare to the outcomes in real life cases, and whether different assumptions for different banks might be warranted (for instance, varying asset value recoveries in function of business models or national insolvency regimes.

Court confirmed the SRB's treatment of Banco Popular shareholders and creditors

In June 2017, the SRB adopted a resolution scheme for the Spanish bank Banco Popular under which the bank was sold to Santander for 1 euro and shareholders lost their investment. **The legal framework envisages that shareholders and creditors are compensated after the fact if their losses would have been smaller in normal insolvency proceedings.** On the basis of the due independent valuation and after hearing the shareholders, the SRB however decided this was not the case in the Banco Popular resolution.

Several affected parties had challenged the SRB's decision before the General Court, which now ruled on the legality of this type of decision for the first time. The Court of First Instance dismissed the actions in the judgements T-302/20 *et al*.

Notably, the court found that the valuer had used the correct methodology in his valuation – namely, by assuming that the **point of comparison is a "piecemeal" sale of the assets of the insolvent estate** rather than any alternative outcomes possible under national insolvency procedures – even if such alternative procedures would conserve value and national insolvency law gives them a preference over "piecemeal" liquidation. The judgement does not discuss what "piecemeal" means in this context, e.g. if it strictly refers to the sale of each individual loan or could also entail the sale of more complex business units with some franchise value intrinsic to them.

The court also **confirmed the SRB's practice of putting the same valuation expert company (in this case, Deloitte) in charge of the valuation as for other valuations in the same transaction**. The complainants raised the doubt that the valuation could be biased towards confirming earlier results of the same experts, but could not sufficiently demonstrate that this was the case. Finally, the court ruled that the way the SRB had granted the complainants a right to be heard in the process was valid; the complainants raised that they had unsufficient possibilities toi raise their concerns since they had to do so via an online form with a text field limited to 5000 characters.

A bank bail-out bonanza?

The Financial Times observed that in four recent international bank resolution cases [Signature Bank (March), Silicon Valley Bank (March), First Republic Bank (May), Credit Suisse (June)], the **"white knights"** – in other words those banks that, at the request of the public authorities, stepped in and took over the failing banks – **made total profits of USD 44 bn**. In all 4 cases, the public authorities sought to swiftly stabilise markets and to avoid losses to depositors. To this end, they tried to identify potential buyers that were in a position to take over the assets of the failed banks and assume all deposit liabilities, ensuring continued access to the deposits.

The article argues that the **public authorities were desperate to find a buyer and consequently accepted prices that were too low**. Doing so, they have arguably imposed unnecessary losses on creditors and shareholders of the failed bank, on the state and on deposit guarantee schemes. Those losses would show up as excessive profits in the accounts of the respective "white knight".

The topic is particularly relevant from an EU-perspective since the Commission's recent CMDI Reform proposals aim at applying bank resolution more often, including to smaller banks, and make general depositor protection an explicit resolution objective. **It is therefore likely that the Single Resolution**

Board will be inclined to ensure that smaller European banks in resolution are regularly bought by competitors, who would in turn assume the failed bank's deposit liabilities.

Against this backdrop, the ECON Committee has requested **analysis from the standing panel of banking experts** to understand:

- to what extent the views of the FT article can be corroborated;
- to what extent the issue is also pertinent in Europe, specifically; and
- what lessons can possibly be drawn for making resolution more efficient, when a gain for an acquirer might be a loss for creditors, DGS or the public purse.

Three papers have come in, see Box 3. **Overall, all three papers confirm that acquirers may profit too much when a bank in resolution is quickly sold.** The paper by SAFE takes a methodologically more robust look at the findings of the FT article. It explains how accounting gains - as in the FT's headline figure of USD 44bn - can be misleading since the assets of the acquired bank may reflect unrealised losses. Instead, the paper applies the established event study methodology to the transactions. This means that during an event window around the announcement, the cumulated "abnormal" appreciation of the acquirer's stock, compared to the performance of comparable stocks, is measured. This approach is not biased by accounting and it **turns out that the excess profit for the four acquirers is much smaller than what the FT suggested, but at USD 20bn still a big amount**.

The particular added value of the paper by Bertay and Huizinga is that it considers **10 European transactions** since the implementation of the BRRD regime **to establish if the problem exists in the EU, too**. The authors indeed report average accounting gains relative to acquired bank assets of about 2.9%. This is above the corresponding figure of 2.6% for the three recent US transactions but below the 5.0% in the Credit Suisse case. The authors also apply, where available, a measure based on stock market valuations and arrive at similar results. Possibly for the European cases in the past the results are more aligned between accounting and stock market valuations since the unrealised gains pinpointed in the SAFE paper must be particularly high in the current interest rate environment. All in all, and taking into account that the US accounting based figures are inflated, **this comparison shines a rather negative light on the results of European resolution proceedings**.

Box 3 - External expertise "Do 'white knights' make excessive profits in bank resolution?

In September 2023, the ECON Committee requested expertise from its standing banking expert panel on whether acquirers of failed banks make excessive profits in bank resolution. Or, conversely, if resolution authorities tend to sell failed banks too cheaply to other banks:

Ata Can BERTAY and Harry HUIZINGA find that accounting gains to acquirers in bank resolutions in the EU are comparable to those in recent transactions in other major banking markets. Accounting gains for acquirers are shown to be lower in transactions involving relatively bigger acquirers. This suggests that resolution authorities should aim to tie distressed banks to relatively larger acquirers to reduce resolutions costs.

Jakob DE HAAN discusses the four recent international bank resolution cases and how other banks stepped in to take over (part of) the failing banks. His position paper argues that public authorities' aim to quickly find a buyer may have made them accept prices that were "too low", thereby imposing losses for the state and for deposit guarantee schemes. Keeping failed banks longer in receivership, writing off their truly bad parts, and thereafter selling them in an auction may be welfare enhancing and more cost-effective in the end.

The authors from **SAFE - Florian HEIDER, Jonas SCHLEGEL, Tobias H. TRÖGER and Mark WAHRENBURG -** look at potential windfall profits for the four banking acquisitions in 2023. Based on accounting figures, an FT article states that a total of USD 44bn was left on the table. We see accounting figures as a misleading analysis. By estimating marked-based cumulative abnormal returns (CAR), we find positive abnormal returns in all four cases which when made quantifiable, are around half of the FT's accounting figures. Furthermore, we argue that transparent auctions with enough bidders should be preferred to negotiated bank sales.

Turning to policy conclusions, the paper by De Haan recommends avoiding to rush in the sales process, **keeping failed banks longer in receivership**, writing off their truly bad parts, and thereafter selling them in an auction as a more cost-effective approach. Also Bertay and Huizinga argue that a bridge bank tool with a sale at a later point in time, can enhance competition among bidders for a failed bank. The SAFE paper concurs that the resolution cost in the recent US cases were driven by hasty processes, but concedes that the nature of the failures, driven by rapidly developing illiquidity, limited the possibility of preparation. The authors also recommend a **competitive auction** format for the sale, emphasising the need for **adequate preparation** in resolution planning, for smaller and larger banks, to be ready to attract a sufficient number of bidders with sufficient transparency if ever a sudden deterioration occurs. In any case, the authors convincingly argue against a negotiated transaction with a single potential acquirer. While all three papers agree on the importance of competition, it is striking that in all 10 European cases reported by Berta and Huizinga, **the acquirer and the failed bank were from the same Member State**, regardless of whether the SRB or a national authority took charge. It is impossible to say based on public information if this resulted despite a competitive process or is indicative of a lack thereof.

Liquidity in resolution

The relatively recent bank failures in the US and Switzerland were chiefly due to liquidity stress at fundamentally solvent banks, even if they played out against the background of at times high unrealised losses on securities portfolios. In light of this, the SRB's latest reporting note to the Eurogroup raised the issue of liquidity in resolution and demanded that the **SRB's resolution toolkit "must be backed up by effective liquidity provisions"** even though the Single Resolution Fund (SRF) stands at almost EUR 80 billion. First, the **SRB points to the Common Backstop, which is still not in place**, pending ratification by Italy. Pending its availability, the SRB is working on operationalising its use. The SRB has developed a collateral policy to apply when banks under resolution will access liquidity from the backstop and a joint SRB-ESM team has elaborated a common methodology for the "repayment capacity assessment". Since borrowing by the SRB from the backstop must be fiscally neutral over the medium term, such an assessment is a prerequisite for borrowing. Second, the SRB feels that even with the Common Backstop in place, the Banking Union is still mainly equipped to solve a solvency-driven crisis rather than a liquidity one since **available liquidity facilities may not be sufficient in "tail risk" cases** of the failure of a global systemically important bank (G-SIB) or of several medium-sized banks failing at the same time.

According to the Council's website, Eurogroup **ministers engaged in a discussion on (…) what remains to be done** to preserve the resilience of our system and address the challenges ahead.

SRB's strategic review and 2024 annual work program

In its May 2023 report to the Eurogroup, the new strategy was announced for December 2023. The latest information we could find on this is a speech for the IIF. The speech thanks industry for input and talks of a "Vision 2028" which however is not yet public. Increased transparency to stakeholders is mentioned as one "cornerstone", emphasising the aim to consult the industry more on future policies. Further, in resolution planning, a shift from resolvability capacity building to a **new phase of testing and operationalising** is announced. Finally, the SRB announces **own on-site inspections** at banks, in coordination with the SSM to avoid overlaps.

At the beginning of 2023, the SRB started what it calls an "inclusive and participative process to define its strategy" beyond end 2023. Apparently, the SRB has held consultations internally, with the ECB, with the European Commission and with national resolution authorities. We understand it has also reached out to industry and other external stakeholders, however not in a format open to the interested public. Except the hints in the speech mentioned above, **we did not find information on the specific objectives of such a new strategy**.

Meanwhile, the SRB has published (under embargo at the time of finalising the briefing) its **2024 work program**. This document speaks of a **SRM strategy, to be adopted by the board in plenary session in January 2024**, involving the national resolution authorities. It also announces that this SRM strategy will be followed by a **new multi-annual work program**, equally to be adopted by the board's plenary session. This would "complete the SRM strategy with a participatory process". We understand that the **SRB has started joint work with national authorities on a five year program in mid 2023**.

It is not fully clear how the present work program relates to this longer term program and the new strategy. On the one **hand, we read that the annual work program takes account of the ongoing strategic review, on the other, we are informed that it might be adjusted once** the multi-annual one is final. An initial review shows that the **annual work program is organised along the lines of the existing strategic areas and objectives and most of the text refers to the continuation of existing activities**. Some noteworthy announced innovation are staff exchanges with the ECB and focus on digital transformation, data capabilities, "a strong organisational culture with positive values and open external dialogue" and "revamp of the talent management strategy". The SRB also announces a review of its organisation, to assess if the new strategy requires changes.

In its "Core Business", the SRB announces work, from 2024 onwards, on the **consolidation of its centralised crisis management function**, on the further operationalisation of the resolution tools, developing a comprehensive approach to crisis readiness and adapting the crisis management framework to evolving external threats. A new unit was set up for crisis management and preparedness in 2023, which is now supposed to make all resolution tools operational, conduct dry runs and trainings and enhance capabilities for valuation, bail-in and procurement. Further focus is announced on evolving external threats and mitigating action.

SRB's MREL report for the first quarter 2023

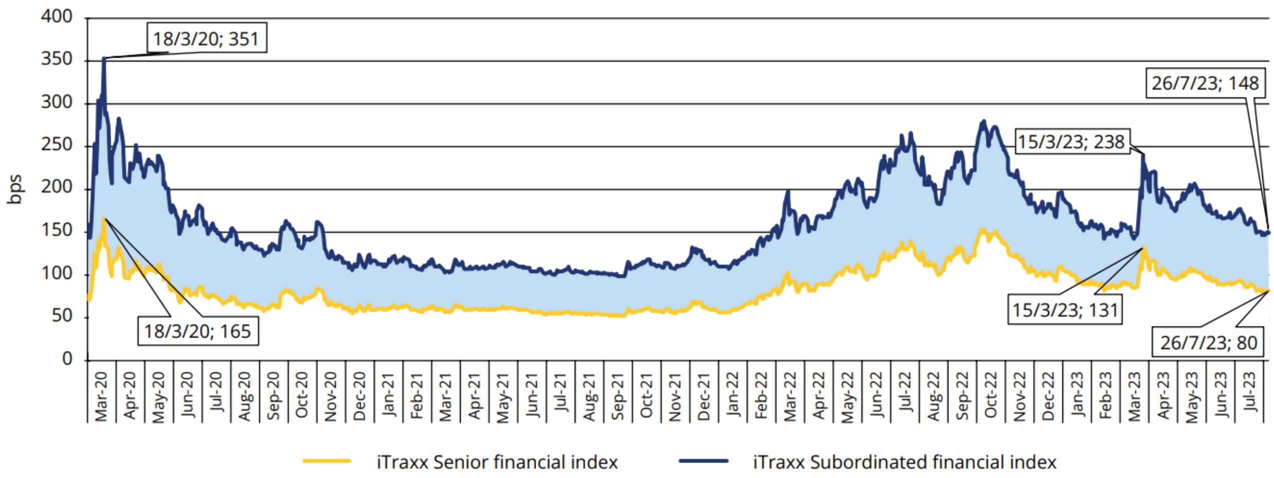
In August, the SRB published its MREL dashboard report for the first quarter of 2023, presenting the evolution of MREL targets and shortfalls, the level and composition of resources, and recent developments in the cost of funding. The analysis in that report actually covers a longer period than just the first quarter, as the SRB therein also comments on some effects caused by the failures of the Silicon Valley Bank (SVB) and Credit Suisse.

In the first quarter of 2023, banks under the SRB's remit issued approximately EUR 118 bn of MREL-eligible instruments, an **amount significantly higher** than that in the previous quarter and that in the same period the year before.

However, at the end of the first quarter of 2023, the **turmoil created by SVB and Credit Suisse** initially hindered further issuances, but activities resumed in mid-April, and from May onwards the issuance activity on unsecured markets was strong again and significantly above the levels registered for the same period in 2022.

The SRB writes that in terms of pricing, **spreads** correspondingly saw a **violent increase in mid-March** (see figure 3), directly after the SVB and Credit Suisse events. However, after a short period of market volatility, spreads started to decline, and at the beginning of **July**, funding costs were reportedly **back to the previous level**, close to that ahead of those bank failures.

Figure 3: MREL - Cost of funding (iTraxx Europe Financials)



Source: SRB MREL dashboard report Q1 2023 (SRB computations based on Bloomberg Finance L.P.)