# Capital Adequacy (Consolidated) [Disclosure under Basel II Pillar III]

# Disclosure Regarding Capital Adequacy (Basel II Pillar III)

Basel II, applied from fiscal 2006 (ended March 31, 2007), comprises three pillars. Pillar I is a new method for computing bank capital adequacy ratios. Pillar II is composed of an internal capital adequacy assessment process by industry and a supervisory review and evaluation process. Pillar III is appropriate disclosure regarding capital adequacy to be evaluated fairly by the market. The requirements for the Bank relating to disclosure are contained in Article 112 of the Implementation Ordinances of the Norinchukin Bank Law (available for public inspection, specific details to be covered in the Bank's disclosure document) and in Item 5-2 of that Article, "Items to Be Specified Separately by the Minister of Agriculture, Forestry and Fisheries and the head of Japan's Financial Services Agency: Disclosure Regarding Capital Adequacy," the Notification Regarding Basel II Pillar III Disclosure. The Bank makes qualitative disclosures (the original Japanese version of this document) once a year (for the fiscal year ended March 31, which is released by July 31) and quantitative disclosure twice a year, once for the interim period ended September 30 (released by the end of January of the immediate following year) and once for the end of the fiscal year on March 31, which is released by July 31 (the original Japanese version of this document). In addition, the Bank issues quantitative disclosure on a quarterly basis (which includes information on the capital adequacy ratio and other principal indicators), once for the quarterly period ending June 30, which is released by October 31, and once for the quarterly period ending December 31, which is released by April 30.

Under Basel II Pillar III, the principal content disclosed is as follows: (1) information related to Pillar I (namely, the balances of each asset category used as the basis for computation of the capital adequacy ratio) and (2) information related to Pillar II (namely, information on interest rate risk and an explanation of risk management policy). The information related to assets to be disclosed in compliance with Basel II Pillar III includes credit risk exposure, including assets that are subject to Internal Ratings-Based Approach (IRB), securitization exposures, risk weighted asset calculation for investment fund (money in trust other than money trusts under the reporting bank's management, investments in funds and other assets held in some form, but not directly) and assets subject to market risk, operational risk or some other risk. The Bank discloses exposure, exposure at default (EAD) and the definition of regulatory required capital. (For details, please refer to the Glossary of Terms below and on the following page.) Please note that qualitative disclosure requirements under the Notification Regarding Basel II Pillar III disclosure, on a consolidated and nonconsolidated basis, have been specified, such as explanations of the risk management policy, etc. However, since the Bank conducts its primarily businesses on a non-consolidated basis, the Bank has disclosed relevant information essentially on a non-consolidated basis. (For consolidated subsidiaries, information is provided in the section "Risk Management of Consolidated Subsidiaries.") In addition, for the convenience of readers of this document, we have included the relevant information in the sections Capital Position and Risk Management as well as Capital Adequacy (Consolidated).

The objective of this detailed disclosure under Basel II Pillar III is to inform readers how the categories of bank's assets, the main components of the denominator of capital adequacy ratio, are managed and calculated to provide them with a better understanding of the Bank's risk management activities. Going forward, in addition to the accounting information, which is a primary component of disclosure, the Bank continues to enhance its disclosure under Basel II Pillar III of risk-related information and has taken initiatives to enhance convenience for users of disclosed information throughout its disclosure activities.

#### Glossary of Terms Exposure

Exposure is defined as those amounts (before credit risk mitigation) appeared as the on-balance sheet assets, subject to the credit risk, plus amounts (before credit risk mitigation) appeared as the off-balance items, subject to credit risk.

#### **Risk-Weighted Assets for Credit Risk (RA)**

RA is the amount of credit risk computed from exposure, in accordance with the credit risk volume and applied to the computation of the capital adequacy ratio. Since the Bank adopts the Foundation Internal Ratings-Based Approach (F-IRB), certain parameters—namely, probability of default (PD), loss given default (LGD) and exposure at default (EAD)—are required for calculating the amount of risk-weighted assets for credit risk.

#### Probability of Default (PD)

The probability of default is the likelihood that the obligor will be in default in a one-year period.

#### Loss Given Default (LGD)

Loss given default is the percentage of losses that are incurred from the exposure in default. The loss referred here is the economic loss, and the cost of recovering the exposure should be included. In addition, the discount effect with respect to the collection period is also taken into account.

#### Exposure at Default (EAD)

EAD is the amount of the exposure at the time of default. Since the Bank adopts the Foundation Internal

Ratings-Based Approach (F-IRB), it is required to estimate EAD for retail exposure. Regarding corporate, sovereign, and bank exposure, however, the Bank computes EAD using the calculation method described in the Notification Regarding Capital Adequacy.

#### **Risk Weights (RW)**

RW indicates the ratio of the credit risk-weighted asset to EAD. The following formula applies:

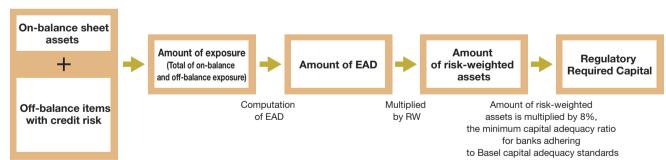
EAD  $\times$  RW (%) = Amount of Risk-weighted assets

The Bank adopts the Foundation Internal Ratings-Based Approach (F-IRB). RW may differ as the PD corresponding to the grade of the internal credit rating varies.

#### **Regulatory Required Capital**

Regulatory required capital is the amount, calculated from the amount of risk, the denominator of the capital adequacy ratio, multiplied by 8%. The 8% figure is the minimum capital adequacy ratio that banks adhering to Basel capital adequacy standards and with international operations must maintain. Required regulatory capital is computed according to the following formula:

Amount of risk-weighted assets  $\times 8\%$  = Regulatory required capital



# Outline of the Computation Process

# ■ Exposure Classification under Basel II

The Bank's exposure classification used under Basel II is as follows:

Assets subject	Assets for	Assets to	Corporate,	Corporate,		osure		
to computation	which Internal	which Internal	sovereign		Bank exposure	;		
as risk-	Ratings-Based	Ratings-Based	exposure	Corporate	Corporate	Resident corporate		
weighted assets for credit risk	Approach (IRB) can be applied	Approach (IRB) are applied		exposure	exposure	Non-resident corporate		
for credit fisk	can be applied	are appried			Specialized Le	ending (SL)		
			Retail exposure					
			Equity expos	sure				
			Securitizatio	Securitization exposure				
			Risk-weight	sk-weighted assets for investment fund (look-through approach, etc.)				
			Other assets (cash, fixed assets, etc.)					
		Roll-out assets fro	m Standardize	ed Approach to	F-IRB Approac	h		
		Non-IRB applicab	le assets (asse	ts for Standard	lized Approach)			
Assets subject to ev	valuation at market	risk (Trading accour	nt)					
Amounts deducted	from capital (goody	will, etc.)						

Assets not subject to risk computations

### Items for Quantitative Disclosure Related to Capital Adequacy Condition (Basel II Pillar III)

Capital adequacy conditions of the Bank in line with Basel II are described on the following pages.

#### **Capital Adequacy**

Contents of principal capital items are described as follows.

Items		Content of principal quantitative disclosure	Consolidated disclosure (Page)	Non-consolidated disclosure (Page)
Items related	Capital adequacy ratio	Detailed components of Tier I capital and Tier II capital	117	147
to composition of capital	Explanation of computation of capital adequacy ratio	Scope of consolidation	119	_
Items relating to	e capital adequacy	For the purpose of capital adequacy assessment, the capital adequacy ratio (being above the regulatory minimum of 8%), total amounts of regulatory required capital and details of principal exposure (credit risk exposure, market risk, operational risk, etc.) are disclosed.	120	149

#### **Risk Exposures**

This section describes detailed amounts of the Bank's various risks and exposures (including credit risk exposure, securitization exposure, market risk, equity exposure, Risk-weighted asset calculation for investment fund and interest rate risk), which form the basis for the computation of the capital adequacy ratio. This section also describes factors that affect the risk profiles, such as credit risk mitigation.

	Items		Content of principal quantitative disclosure	Consolidated disclosure (Page)	Non-consolidated disclosure (Page)
	Credit risk exposure		Credit risk exposure (excluding securitization exposure and funds), details on the reserve for possible loan losses by region and industry	121	150
		Corporate, sovereign, and bank exposure	Details on PD, LGD, RW and EAD for corporate, sovereign, bank, and equity subject to the PD/LGD approach	126	154
	Exposure	Retail exposure	Details on PD, LGD, RW and EAD	129	156
Items related to credit	subject to Internal Ratings-	Actual losses, etc., on expo- sure to corporate, sovereign, bank and retail	Actual losses, long-term comparison between estimated losses and actual losses	131	158
risk Based Approach (IRB) Exposure to Specialized Lending subject to super- visory slotting criteria	Amount of exposure by RW	132	159		
		Equity exposure subject to the simple risk-weighted method	Amount of exposure by RW	132	159
	Exposure a Approach	subject to Standardized	Amount of exposure by RW	133	160
Items wit	h respect to	credit risk mitigation	Coverage/application of collateral, guarantees, etc.	134	161
Items relation		terparty risk in derivative	Derivative transaction activity	137	162
Items rela	ated to secur	ritization exposure	Details on securitization exposure	139	163
Items rela	ated to mark	et risk	VaR and amount of market risk in trading account	142	165
Items rela	ated to equit	y exposure	Details of equity exposure those directly held	143	166
		sure subject to risk-weighted investment fund	Risk-weighted assets for investment fund	145	168
Items rela	ated to inter	est rate risk	Interest rate risk for internal management purposes	146	169

# 1. Capital Structure (Consolidated)

### (1) CAPITAL ADEQUACY RATIO (CONSOLIDATED)

#### Consolidated Capital Adequacy Ratio (Basel capital adequacy standards) (Basel II)

Note: The Bank's capital adequacy ratio for the fiscal year ended March 31, 2009 and 2008, was computed according to Basel II.

As of March 31

	Itans		s of yen	Millions of U.S. dollar	
	Items	2009	2008	2009	
	Capital stock	3,421,370	2,016,033	34,823	
	Included as non-cumulative, perpetual preferred stock	24,999	24,999	254	
	Deposit for subscription to preferred stock			_	
	Capital surplus	25,020	25,020	254	
	Earned surplus	803,359	1,372,019	8,176	
	Less: Amount correspanding to the decrease in capital due to merger of subsidiaries			_	
	Less: Treasury stock	150		1	
	Deposit for subscription to treasury stock	150			
	Unrealized loss on other securities	(1,872,404)	(296,724)	(19,057)	
	Foreign currency transaction adjustment	(1,072,404)	(16)	(1),037)	
	Stock acquisition rights	(1))	(10)	(0)	
Tier I	Minority interest of consolidated subsidiaries	5,779	5,970	58	
capital	Including preferred securities issued by overseas	5,119	5,970	50	
oupitui	special-purpose corporations	—	_		
	Less: Amount corresponding to operating rights				
	Less: Amount corresponding to operating rights				
	Less: Intangible assets aquired via business combination				
	Less: Goodwill and others				
	Less: Amount corresponding to the increase in capital due to				
	securitization transactions			_	
	Less: Amount equivalent to 50% expected losses in excess of qualifying allowance	64,200	81,416	653	
	Subtotal (A)	2,318,755	3,040,886	23,600	
	Including preferred securities with interest rate step-up clause			_	
	(Ratio of the value of such preferred securities to Tier I capital)		_	_	
	45% of unrealized gains on other securities			_	
	45% of unrealized gains on land	23,231	24,147	236	
	General reserve for possible loan losses	64	34	0	
Tier II	Qualifying subordinated debt	1,746,775	1,301,395	17,778	
capital	Included as perpetual subordinated bonds and loans	1,476,057	963,700	15,023	
	Included as dated subordinated bonds, loans, and preferred stock	270,718	337,695	2,755	
	Subtotal	1,770,072	1,325,577	18,016	
	Tier II capital included as qualifying capital (B)	1,770,072	1,325,577	18,016	
Tier III	Short-term subordinated debt			— —	
capital	Including amount added to capital (C)			_	
Deductions	Deductions (D)	337,375	327,619	3,433	
	(A)+(B)+(C)-(D) (E)	3,751,452	4,038,844	38,182	
1	Risk-weighted assets for credit risk (F)	22,573,253	29,254,774	229,753	
	Including on-balance sheet	21,039,106	27,235,216	214,138	
Risk-	Including off-balance sheet	1,534,147	2,019,557	15,614	
weighted	Assets equivalent to market risk (G)	730,398	2,076,684	7,434	
assets	(For reference: actual market risk volume) (H)	58,431	166,134	594	
	Amount corresponding to operational risk (J)/8% (I)	790,748	1,051,386	8,048	
	(For reference: amount corresponding to operational risk) (J)	63,259	84,110	643	
	Total risk-weighted assets $(F)+(G)+(I)$ (K)	24,094,399	32,382,844	245,235	
asel II Canita	I Adequacy Ratio (Basel capital adequacy standards) = $(E)/(K) \times 100\%$	15.56%	12.47%	15.56%	
	A)/(K) $\times$ 100%	9.62%	9.39%	9.62%	
	equired capital	1,927,551	2,590,627	19,618	

- Notes: 1. The Bank's capital adequacy ratio was computed according to the stipulations outlined in Notification No. 4 of the 2006 Financial Services Agency and the Ministry of Agriculture, Forestry and Fisheries of Japan (Standard for Judging the Management Soundness of the Norinchukin Bank) (hereinafter, Notification Regarding Capital Adequacy). Note that the Bank adopts Foundation Internal Ratings-Based Approach (F-IRB) in computing risk-weighted assets for credit risk and the Standardized Approach (TSA) in computing the amount corresponding to operational risk.
  - 2. Regarding the calculation of capital adequacy ratio, certain procedures were performed by Ernst & Young ShinNihon LLC pursuant to "Treatment of Inspection of Capital Ratio Calculation Framework Based on Agree-upon Procedures" (JICPA Industry Committee Report No. 30). It does not constitute a part of the audit on financial statements by law, but a review on agree-upon procedures on internal control of capital adequacy calculation. Accordingly, Ernst & Young ShinNihon LLC does not address any opinion as a result of the review.
  - 3. The Tier II capital item "general reserve for possible loan losses" is limited to the amount corresponding to assets which is calculated according to a Standardized Approach in terms of risk-weighted assets for credit risk.
  - 4. Those are items of Deductions: (1) the total amount of the value corresponding to intentional holdings of capital investments issued by other financial institutions, (2) holdings of instruments issued for raising capital, issued by affiliated corporations conducting financial service businesses, (3) 50% of the expected losses on exposure to corporate, sovereign and bank, and expected losses on retail exposure over the value of qualified reserves, (4) expected losses on equity exposure, and (5) securitization exposure subject to deduction from capital. (Notification Regarding Capital Adequacy, Article 8)
  - 5. In computing risk-weighted assets for credit risk, the Bank has applied a scaling factor of 1.06 to the amount of risk-weighted assets for credit risk computed based on its Foundation Internal Ratings-Based Approach (F-IRB), as provided for in the Notification Regarding Capital Adequacy, Article 129.

#### (2) REMARKS ON COMPUTATION OF THE CONSOLIDATED CAPITAL ADEQUACY RATIO

## Companies with Less than the Regulatory Required Capital and the Amounts

Those companies whose capital is less than the regulatory required capital and the amounts of shortfall in capital among those companies that are subject to capital deduction as provided for in the Notification Regarding Capital Adequacy, Article 8-1-2 a and b.

None of the Bank's Group companies fall under this category.

#### Scope of Consolidation

There are no discrepancies between the companies belonging to the Bank's Group that are required to compute a consolidated capital adequacy ratio, as specified in the Notification Regarding Capital Adequacy, Article 3, (hereinafter, the Consolidated Group) and the companies to be included in the scope of consolidation, based on regulations relating to terminology, format, methods of preparation of the consolidated financial statements (under Ministerial Ordinance No. 28, issued by the Ministry of Finance in 1976). As of March 31, 2009, the Bank had eight consolidated subsidiaries. The names and principal lines of business of the primary subsidiaries are as follows:

- 1. Norinchukin Trust & Banking Co., Ltd.: Trust and banking business
- 2. Kyodo Housing Loan Co., Ltd.: Loans for housing and related purposes

The Bank has no companies that are subject to capital deduction under the Notification Regarding Capital Adequacy, Article 8-1-2 a and b.

There were no associated companies that conducted financial service business that were subject to the provisions of the Notification Regarding Capital Adequacy, Article 9.

As of March 31, 2009, there was one company that conducted closely related business activities, as specified in Article 72-1-8 and 9 of the Norinchukin Bank Law (Law No. 93, 2001), but was not included in the scope of consolidation.

The company was Daiichi Life Norinchukin Building Management Co., Ltd.

There are no restrictions on the transfer of funds and capital among the members of the Consolidated Group.

# 2. Items for Capital Adequacy (Consolidated)

(Minimum amount of regulatory required capital and breakdown for each risk category as required under Basel II)

#### **Regulatory Required Capital**

	As of Mar	rch 31, 2009	As of Mar	ch 31, 2008
Items	EAD	Regulatory Required Capital	EAD	Regulator Required EAD
mount of regulatory required capital for credit risk	76,012	2,256	73,707	2,728
Exposure subject to Internal Ratings-Based Approach	75,954	2,254	73,653	2,726
Corporate exposure (excluding Specialized Lending)	6,148	460	7,047	419
Corporate exposure (Specialized Lending)	763	109	742	71
Sovereign exposure	32,970	0	19,226	0
Bank exposure	12,280	103	14,291	111
Retail exposure	474	24	344	23
Retail exposure secured by residential properties	435	19	306	18
Qualifying revolving retail exposure		—		
Other retail exposure	38	5	37	4
Securitization exposure	6,168	193	6,039	112
Equity portfolios	477	63	807	121
Equity portfolios subject to PD/LGD approaches	104	18	73	9
Equity portfolios subject to simple risk-weighted method	41	13	90	30
Equities under the internal models approach	9	4	162	40
Grandfathered equity exposure	321	27	480	40
Exposure subject to risk-weighted asset calculation for investment fund	16,107	1,263	24,621	1,840
Other debt purchased	58	1	83	2
Other exposures	506	33	451	24
Exposure subject to Standardized Approach	57	1	53	1
Assets subject to Standardized Approach on a non-consolidated basis	16	1	10	0
Assets subject to Standardized Approach in consolidated companies (excluding securitization exposure)	38	0	41	0
Assets subject to Standardized Approach in consolidated companies (securitization exposure)	1	0	2	0
nount of regulatory required capital for market risk	/	58	/	166
Standardized Approach	/	57	/	165
Interest rate risk category	/	—	/	_
Equity risk category	/	_	/	_
Foreign exchange risk category	/	57	/	165
Commodity risk category	/	_	/	
Option transactions	/	_	/	
Internal models Approach	/	0	/	0
mount of regulatory required capital for operational risk	/	63	/	84
ffsets on consolidation	/	2,378	/	2,978

Notes: 1. Regulatory required capital for credit risk = 8% of risk-weighted assets for credit risk + Expected losses + Deductions from capital

2. "Risk-weighted asset calculation for investment fund" is risk-weighted assets as calculated according to the method specified in Notification Regarding Capital Adequacy, Article 144.

3. Article 13 of the Notification Regarding Capital Adequacy contains a grand fathering provision for computing the amount of risk assets related to equity exposures that meet specified criteria.

4. Under "The Standardized Approach (TSA)," which is a method for computing the amount corresponding to operational risk, the gross profit for one year is allocated among the business activities as specified in Appendix Table 1 of the Notification Regarding Capital Adequacy. The multiplier specified for each business activity classification is multiplied by the gross profit, and the average of the annual totals for the past three years is taken to be the amount corresponding to operational risk. (Notification Regarding Capital Adequacy, Article 282)

(Billions of yen)

(Billions of yen)

# 3. Items for Credit Risk (Consolidated)

(Funds and securitization exposures are excluded.)

### (1) CREDIT RISK EXPOSURE

#### For Fiscal 2008, ended March 31, 2009

## Geographic Distribution of Exposure, Details in Significant Areas by Major Types of Credit Exposure

Region	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure	Default exposure
Japan	13,215	14,977	5	3,919	32,118	244
Asia except Japan	74	32	0	1,815	1,922	_
Europe	74	2,501	1	1,919	4,497	5
The Americas	274	8,064	2	6,523	14,865	1
Other areas	23	17	0	0	42	_
Amounts held by consolidated subsidiaries	492	29	_	37	559	17
Total	14,156	25,622	9	14,216	54,004	269

#### Industry Distribution of Exposure, Details by Major Types of Credit Exposure

Industry	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure	Default exposure	Write-off of loans (amounts of partial direct write-off)
Manufacturing	2,340	282	1	0	2,623	50	5
Agriculture	44	0	_	0	44	5	1
Forestry	41	_	_	_	41	1	0
Fishing	36	_	_		36	26	2
Mining	18	1	_	0	19	_	_
Construction	161	17	_	0	179	5	1
Utility	147	48	0	0	196	_	_
Information/telecommunications	108	32	_	0	141	6	_
Transportation	706	69	3	0	778	10	_
Wholesaling, retailing	1,664	54	0	0	1,719	24	0
Finance and insurance	1,464	4,186	4	13,656	19,312	5	0
Real estate	463	160	_	0	624	87	1
Services	1,364	54	0	1	1,420	27	4
Municipalities	337	35	_		373		_
Other	4,762	20,651	_	519	25,933	0	0
Amounts held by consolidated subsidiaries	492	29	_	37	559	17	1
Total	14,156	25,622	9	14,216	54,004	269	19

Note: "Others" within "Finance and insurance" includes repo-type transactions, call loans, and certain other items.

Term to maturity	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure
In 1 year	9,861	5,128	0	12,068	27,059
Over 1 year to 3 years	1,541	3,686	3	50	5,281
Over 3 years to 5 years	1,389	4,890	0	6	6,287
Over 5 years to 7 years	470	1,763	1	4	2,238
Over 7 years	327	9,653	3	_	9,985
No term to maturity	72	471	_	2,049	2,593
Amounts held by consolidated subsidiaries	492	29	_	37	559
Total	14,156	25,622	9	14,216	54,004

(Billions of ven)

#### **Residual Contractual Maturity Breakdown of Credit Risk Exposure**

Notes: 1. The amount of credit exposure at the end of the period does not substantially differ from the average-risk position during fiscal 2008.

2. The amounts of credit-risk exposure held by consolidated subsidiaries are less than 1% of consolidated risk exposure, so only the total amounts held by these subsidiaries are shown.

3. Within credit risk exposure, credit risk exposure subject to the Standardized Approach was ¥57.9 billion.

4. Default exposure is classified in the Bank's self-assessment as being under "Debtor Under Requirement of Control."

# For Fiscal 2007, ended March 31, 2008 Geographic Distribution of Exposure, Details in Significant Areas

#### by Major Types of Credit Exposure

(Billions of yen) Loans, commit-Total credit Default Region ments, off-balance Securities Derivatives Others risk exposure exposure sheet exposure 12,472 Japan 9,404 88 4,906 26,872 214 Asia except Japan 70 27 9 1,528 1,635 Europe 113 3,224 485 3,148 6,972 1 2,165 The Americas 289 5,827 273 8,556 \_\_\_\_\_ Other areas 30 19 3 0 54 Amounts held by consolidated subsidiaries 365 20 51 437 14 \_\_\_\_ Total 13,342 18,525 860 11,800 44,528 231

(Billions of yen)

Industry	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure	Default exposure	Write-off of loans (amounts of partial direct write-off)
Manufacturing	2,243	431	1	0	2,676	45	3
Agriculture	44	0		0	44	6	0
Forestry	44	_	_	0	44	1	0
Fishing	39			0	39	29	0
Mining	15	1	_	0	16		_
Construction	161	12	_	0	173	1	_
Utility	146	56	0	0	202		_
Information/telecommunications	103	36	_	0	139	0	_
Transportation	668	95	2	0	767	12	
Wholesaling, retailing	1,668	78	1	0	1,747	26	0
Finance and insurance	1,552	5,416	854	10,628	18,452	4	
Real estate	535	211	0	0	746	39	_
Services	1,319	57	0	1	1,378	48	2
Municipalities	424	44		0	468		
Other	4,009	12,063	0	1,119	17,192	0	_
Amounts held by consolidated subsidiaries	365	20	_	51	437	14	2
Fotal	13,342	18,525	860	11,800	44,528	231	9

#### Industry Distribution of Exposure, Details by Major Types of Credit Exposure

Note: "Others" within "Finance and insurance" includes repo-type transactions, call loans, and certain other items.

#### **Residual Contractual Maturity Breakdown of Credit Risk Exposure**

Term to maturity	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure
In 1 year	9,448	452	146	9,688	19,735
Over 1 year to 3 years	1,659	2,468	708		4,837
Over 3 years to 5 years	1,155	2,991	0	57	4,205
Over 5 years to 7 years	337	1,218	0	3	1,560
Over 7 years	358	10,604	3	661	11,627
No term to maturity	17	769		1,337	2,124
Amounts held by consolidated subsidiaries	365	20		51	437
Total	13,342	18,525	860	11,800	44,528

Notes: 1. The amount of credit exposure at the end of the period does not substantially differ from the average-risk position during fiscal 2007.

2. The amounts of credit-risk exposure held by consolidated subsidiaries are less than 1% of consolidated risk exposure, so only the total amounts held by these subsidiaries are shown.

3. Within credit risk exposure, credit risk exposure subject to the Standardized Approach was ¥53.7 billion.

4. Default exposure is classified in the Bank's self-assessment as being under "Debtor Under Requirement of Control."

### (2) RESERVES FOR POSSIBLE LOAN LOSSES

Increase/Decrease in General Reserve for Possible Loan Losses, Specific Reserve for Possible Loan Losses and the Specific Reserve for Loans to Countries with Financial Problems by Region

Region	As of March 31, 2009	As of March 31, 2008	Increase/(decrease)
General reserve for possible loan losses	47	40	7
Specific reserve for possible loan losses	100	86	13
Japan	98	84	14
Asia except Japan	_		
Europe	1	1	(0)
The Americas	0		0
Other areas	_		
Amounts held by consolidated subsidiaries	10	7	3
Offsets on consolidation	(2)	(4)	1
Specified reserve for loans to countries with financial problems	_	0	(0)
Total	155	129	26

# Increase/Decrease in General Reserve for Possible Loan Losses, Specific Reserve for Possible Loan Losses and the Specified Reserve for Loans to Countries with Financial Problems by Industry

Industry	As of March 31, 2009	As of March 31, 2008	Increase/(decrease)
General reserve for possible loan losses	47	40	7
Specific reserve for possible loan losses	100	86	13
Manufacturing	12	9	3
Agriculture	2	3	(0)
Forestry	0	0	(0)
Fishing	13	15	(1)
Mining	_		—
Construction	0	0	0
Utility	_		
Information/telecommunications	3	0	2
Transportation	6	8	(2)
Wholesaling, retailing	15	17	(1)
Finance and insurance	1	0	1
Real estate	35	15	19
Services	7	14	(6)
Municipalities	_		—
Other	_	0	(0)
Others	_		—
Amount held by consolidated subsidiaries	10	7	3
Offsets on consolidation	(2)	(4)	1
Specified reserve for loans to countries with financial problems		0	(0)
Total	155	129	26

#### (3) EXPOSURE SUBJECT TO THE INTERNAL RATINGS-BASED APPROACH

Types of Exposure by Portfolio and Overview of Procedures for the Internal Rating

#### Corporate, Sovereign and Bank Exposure

#### Types of Exposure

Corporate, sovereign and bank exposure include exposure to corporate, sovereign, bank and Specialized Lending.

Within these categories, corporate is subdivided into resident and non-resident corporate.

Specialized Lending is subdivided into Income-Producing Real Estate (IPRE), High-Volatility Commercial Real Estate (HVCRE), Object Finance (OF) and Project Finance (PF).

#### **Outline of Internal Rating Procedure**

Assigning internal ratings to the obligor of corporate exposure is in accordance with the following procedure. The front sections prepare a draft proposal for the internal ratings. The draft proposal is then reviewed and approved by the credit risk management section. Specifically, this process is stipulated in manuals prepared for each type of exposure, such as corporate, sovereign, bank and Specialized Lending.

#### Work Flow for Assigning Internal Ratings

All the available, important and relevant information which are the most recent is considered when internal ratings are assigned. In addition, internal ratings are subject to more than annual "regular reviews," when the latest financial results of the borrower are reflected in the revised ratings. When there are events that may trigger the changes in internal ratings, the Bank conducts an "ad-hoc review."

	Items for Review	Content of Review
1	Financial rating	Based on qualitative data of the obligor, including financial information, the appropriate model accord- ing to the risk profile of the obligor is used to assign the internal rating.
2	Adjustments in financial rating	In addition to the process stated above, the Bank may consider the events which should affect the rating, and determined a rating.
3	Qualitative evaluation	Among significant elements to evaluate creditwor- thiness of the obligor, those elements which may not be captured by qualitative evaluation are evaluated.
4	Country adjustments	Adjust a rating of obligor by applying the rating of country where substantial risk of obligor belongs to as the ceiling on the rating the Bank will assign.
5	Consideration of external information	Supplemental to quantitative and qualitative evalua- tion, the Bank may consider other elements, such as changes in agency rating, or stock price, and adjust the rating.
6	Determination of debtor classification	Determine the classification of a obligor in accor- dance with Procedure for Self-Assessment Exercise.
7	Final ratings	To reflect the situation of the obligor more accurately, supplemental evaluation may be conducted before the final decision of the internal rating.

Note that the internal auditing units of the Bank, which are independent of the front sections and the credit risk management sections, also audit the ratings to ensure the appropriateness of the internal ratings and the accuracy of internal rating results.

#### Equity Exposure

Internal ratings are assigned to equity exposure, according to the same process as in assigning ratings to corporate exposure whenever possible.

#### Retail Exposure

For retail exposure, eligible criteria for retail pool, the pool which requires risk management framework for retail exposure, is stipulated in Procedures for Internal Rating of Retail Exposure. For each type of retail exposure, having residential properties, qualifying revolving retail exposure as underlying, clustering of exposures into the pools (equivalent to the rating of corporate, sovereign and bank exposures) is determined according to risk profile. Ratings for individual retail exposure are assigned in accordance with Internal Rating Manual for Retail Exposure.

# a. Corporate, Sovereign and Bank Exposure

# Internal Ratings and Estimation of Parameters

The table of probability of default for various internal ratings is divided into four categories: resident corporate, non-resident corporate, sovereign and bank. The methods for estimating these probabilities of default are (a) the internal estimate method: the Bank estimates the long-term average for probability of default according to internal rating grades based on internal default data of the Bank and (b) mapping technique: the Bank maps internal grades to rating grades used by a credit rating agency and applies the default rate for a rating grade of the agency to a corresponding grade of internal rating of the Bank.

Please note that the Bank's definition of default used in estimating the probability of default and in validation satisfies the criteria stipulated in Notification Regarding Capital Adequacy.

Please note that for Specialized Lending, the Bank applies slotting criteria to compute risk-weighted assets.

Ratings	Weighted- average PD	Weighted- average LGD	Weighted-average risk weight	EAD	EAD (on-balance sheet)	FAD (- ff h-laws - ) - (
~				< 1.10	,	
Corporate Exposure	5.01%	44.88%	94%	6,148	5,430	717
1-1 to 4	0.18%	44.99%	38%	4,476	3,847	629
5 to 7	2.75%	44.50%	131%	1,007	951	55
8-1 to 8-2	19.53%	44.70%	355%	486	458	27
Subtotal	2.19%	44.88%	80%	5,971	5,257	713
8-3 to 10-2	100.00%	44.73%	560%	177	172	4
Sovereign Exposure	0.00%	45.00%	0%	32,970	27,819	5,151
1-1 to 4	0.00%	45.00%	0%	32,970	27,819	5,151
5 to 7	7.78%	45.00%	211%	0	0	
8-1 to 8-2	_	_	_	_	_	
Subtotal	0.00%	45.00%	0%	32,970	27,819	5,151
8-3 to 10-2	_	_	_	_	_	
Bank Exposure	0.06%	25.50%	11%	12,280	6,305	5,975
1-1 to 4	0.05%	25.48%	10%	12,255	6,287	5,967
5 to 7	2.66%	42.40%	153%	17	10	7
8-1 to 8-2	7.07%	20.73%	103%	7	6	0
Subtotal	0.06%	25.50%	10%	12,280	6,304	5,975
8-3 to 10-2	100.00%	45.00%	563%	0	0	0
Equity Exposure for Credit Risk Using Internal Ratings: PD/LGD Approach	1.31%	90.00%	218%	104	97	7
1-1 to 4	0.19%	90.00%	149%	77	77	_
5 to 7	4.53%	90.00%	415%	26	19	7
8-1 to 8-2	_	_			_	_
Subtotal	1.30%	90.00%	217%	104	97	7
8-3 to 10-2	100.00%	90.00%	1,125%	0	0	

#### Fiscal 2008 (Ended March 31, 2009)

Notes: 1. Weighted averages of PD, LGD and risk weights are computed based on EAD (including on-balance and off-balance items).

2. Risk weights are equivalent to 8% of the total of the amount of risk-weighted assets and expected loss, divided by EAD.

3. "Equity Exposure for Credit Risk Using Internal Ratings: PD/LGD Approach" does not take account of Rider No. 13 to the Notification Regarding Capital Adequacy (regarding provisional measures for equity exposure).

### Fiscal 2007 (Ended March 31, 2008)

Ratings	Weighted- average PD	Weighted- average LGD	Weighted-average risk weight	EAD	FAD (on-balance sheet)	EAD (off-balance sheet
Corporate Exposure	4.05%	38.93%	74%	7,047	5.099	1,947
1-1 to 4	0.16%	37.14%	28%	5,337	3,542	1,794
5 to 7	1.69%	44.49%	110%	1,101	994	107
8-1 to 8-2	19.21%	44.63%	353%	432	391	41
Subtotal	1.60%	38.79%	62%	6,871	4,928	1,943
8-3 to 10-2	100.00%	44.72%	560%	175	171	3
Sovereign Exposure	0.00%	46.15%	0%	19,226	18,131	1,094
1-1 to 4	0.00%	46.15%	0%	19,225	18,131	1,094
5 to 7	7.78%	45.00%	218%	0	0	
8-1 to 8-2						
Subtotal	0.00%	46.15%	0%	19,226	18,131	1,094
8-3 to 10-2				_	_	_
Bank Exposure	0.05%	25.74%	10%	14,291	6,737	7,554
1-1 to 4	0.04%	25.71%	9%	14,263	6,716	7,546
5 to 7	2.50%	45.00%	157%	16	10	6
8-1 to 8-2	7.07%	27.86%	142%	10	10	0
Subtotal	0.04%	25.74%	10%	14,290	6,736	7,554
8-3 to 10-2	100.00%	45.00%	563%	0	0	0
Equity Exposure for Credit Risk Using Internal Ratings: PD/LGD Approach	0.34%	90.00%	165%	73	73	_
1-1 to 4	0.18%	90.00%	156%	69	69	_
5 to 7	2.06%	90.00%	304%	3	3	
8-1 to 8-2	19.91%	90.00%	783%	0	0	_
Subtotal	0.34%	90.00%	165%	73	73	
8-3 to 10-2						

Notes: 1. Weighted averages of PD, LGD and risk weights are computed based on EAD (including on-balance and off-balance items).

2. Risk weights are equivalent to 8% of the total of the amount of risk-weighted assets and expected loss, divided by EAD.

3. "Equity Exposure for Credit Risk Using Internal Ratings: PD/LGD Approach" does not take account of Rider No. 13 to the Notification Regarding Capital Adequacy (regarding provisional measures for equity exposure).

#### b. Retail Exposure

#### **Retail Pools and Risk Components**

On retail exposure, the Bank estimates parameters, namely PD, LGD, and EAD for each retail pool. Each of those parameters are estimated based on observed internal default data and loss data adjusting recovery amount. It should be noted that applied EAD is the end balance, since the Bank has no exposure for revolving products. Balances for revolving products may be changed within the predetermined credit lines upon request from the obligors.

The weighted average risk weight of the overall residential properties retail exposure is 65%. The weighted average risk weight of the other retail exposure is 166%. The weighted average risk weight in the overall retail exposure becomes 70%.

Please note that the Bank's definition of default used in estimating the probability of default and in validation satisfies the criteria stipulated in Notification Regarding Capital Adequacy.

## Fiscal 2008 (Ended March 31, 2009) Details on PD, LGD, RW and EAD Assets

(Billions of yen) Weighted-Weighted-Weighted-Weighted-Weightedaverage average average EAD (on-EAD (off-EAD Type of exposure average average LGD EL risk balance balance PD LGD default default weight sheet) sheet) Retail exposure secured by residential properties 2.77% 46.60% 82.01% 767 89.26% 65% 475 291 Not default Not delinquent 0.42% 46.65% 1 37% 731 440 291 1 22.92% 44.85% Not default Delinquent 1 1 386% 22 21 0 Not default Subtotal 1.08% 46.60% 1 47% 753 462 291 1 Default 100.00% 89.26% 82.01% 1,116% 13 13 0 1 Qualifying revolving retail exposure Not default Not delinquent / \_ \_ 1 \_ \_ \_ \_ / Not default Delinquent 1 \_ Not default Subtotal 1 1 Default \_ 1 \_ \_ Other retail exposure 8.54% 64.87% 104.84% 95.31% 166% 33 8 41 Not default Not delinquent 64.79% 72% 38 30 7 1.04% 1 1 24.76% 68.48% 365% 0 0 0 Not default Delinquent 1 1 Not default Subtotal 1.55% 64.87% 79% 7 1 1 38 31 2 Default 100.00% 1 104.84% 95.31% 1,311% 2 0 Total 3.07% 47.55% 92.15% 84.47% 70% 808 508 299 0.45% 47.55% 470 299 Not default Not delinquent 1 1 38% 769 1 / 22.98% 385% 22 22 0 Not default Delinquent 45.72% Not default Subtotal 1.11% 47.50% 1 1 48% 792 493 299 Default 100.00% 92.15% 84.47% 1,152% 16 15 0 1

Notes: 1. Purchased retail receivables in investment funds have been included in the amount subject to quantitative disclosure.

2. "Not default Delinquent" is not falling under a default definition in the Notification Regarding Capital Adequacy, but past-due.

3. Risk weights are equivalent to the total of the risk-weighted assets and the amount of dividing the expected loss by 8%, then dividing the result by exposure at default (EAD).

4. For defaulted exposure, the risk weights have been computed taking account of the unexpected losses on default (LGD default) and the expected losses on default (EL default).

5. As of March 31, 2009, the Bank held no Qualifying revolving retail exposure for which net withdrawals of commitments had occurred.

# Fiscal 2007 (Ended March 31, 2008) Details on PD, LGD, RW and EAD Assets

Type of exposure	Weighted- average PD	Weighted- average LGD	Weighted- average LGD default	Weighted- average EL default	Weighted- average risk weight	EAD	EAD (on- balance sheet)	EAD (off- balance sheet)
Retail exposure secured by residential properties	2.88%	49.01%	89.15%	82.61%	71%	680	518	161
Not default Not delinquent	0.45%	49.03%	/	/	41%	647	486	160
Not default Delinquent	24.12%	48.54%	/	/	427%	20	20	0
Not default Subtotal	1.18%	49.01%	/	1	53%	668	507	161
Default	100.00%	/	89.15%	82.61%	1,114%	11	11	0
Qualifying revolving retail exposure		_	_	_	_		_	
Not default Not delinquent			/	/			_	
Not default Delinquent			1	1			_	
Not default Subtotal			1	1				
Default		/		_			_	
Other retail exposure	7.49%	57.03%	73.66%	67.25%	119%	66	58	7
Not default Not delinquent	1.23%	57.20%	1	1	64%	60	52	7
Not default Delinquent	20.96%	52.66%	/	/	260%	2	2	0
Not default Subtotal	1.96%	57.03%	/	/	71%	62	55	7
Default	100.00%	/	73.66%	67.25%	921%	3	3	0
Total	3.29%	49.73%	85.39%	78.89%	75%	746	577	169
Not default Not delinquent	0.52%	49.72%	/	/	43%	708	539	168
Not default Delinquent	23.80%	48.96%	/	/	410%	22	22	0
Not default Subtotal	1.25%	49.70%	/	/	54%	731	562	168
Default	100.00%	/	85.39%	78.89%	1,067%	15	15	0

(Billions of yen)

Notes: 1. Purchased retail receivables in investment funds have been included in the amount subject to quantitative disclosure.

2. "Not default Delinquent" is not falling under a default definition in the Notification Regarding Capital Adequacy, but past-due.

3. Risk weights are equivalent to the total of the risk-weighted assets and the amount of dividing the expected loss by 8%, then dividing the result by exposure at default (EAD).

4. For defaulted exposure, the risk weights have been computed taking account of the unexpected losses on default (LGD default) and the expected losses on default (EL default).

5. As of March 31, 2008, the Bank held no Qualifying revolving retail exposure for which net withdrawals of commitments had occurred.

(Billions of ven)

#### c. Actual Losses on Exposure to Corporate, Sovereign, Bank, and Retail Exposure

#### Actual Losses for the Previous Period, Comparison

#### with the Year before Last Results and Analysis of Causes

			(
Type of exposure	As of March 31, 2009	As of March 31, 2008	Increase/(decrease)
Corporate exposure	25	7	18
Sovereign exposure	_		
Bank exposure	_		
Equity exposure subject to PD/LGD approach	0	0	0
Retail exposure secured by residential properties	0	0	0
Qualifying revolving retail exposure	_		
Other retail exposure	0	0	(0)

Note: Actual losses are defined as losses due to direct write-offs, partial direct write-offs, general reserves for possible loan losses and loan sales of exposure that defaulted up to the end of the previous period.

### Estimated Losses Depend on Historical Long-Term Results, Comparison with Actual Losses

(Billions of yen)								
Type of exposure	As of Marc	ch 31, 2009	As of Marc	h 31, 2008	As of March 31, 2007			
i ype of exposure	Estimated losses	Actual losses	Estimated losses	Actual losses	Estimated losses	Actual losses		
Corporate exposure	46	25	29	7	27	18		
Sovereign exposure	1	_	1	_	1	_		
Bank exposure	0	_	0		0			
Equity exposure subject to PD/LGD approach	0	0	1	0	0	0		
Retail exposure secured by residential properties	1	0	1	0	_			
Qualifying revolving retail exposure	—	_	_		_			
Other retail exposure	0	0	0	0	0	0		

Notes: 1. Comparisons of estimated and actual long-term losses for 10 years accumulatively are scheduled to be disclosed from the year following the application of Basel II (the year ending March 31, 2007).

2. The scope of actual and estimated losses includes the following accounts on balance sheet: loans, foreign exchange, accrued interests in other assets, suspense payable and customers' liabilities for acceptances and guarantees, as well as securities without quoted market values, money trusts without quoted market values, and monetary claims purchased.

3. Estimated losses of each year are amount of expected losses.

# Year-on-year comparison of actual losses and factor analysis of difference between estimated losses and actual losses

For fiscal 2008 (ended March 31, 2009) the actual loss amount increased year-on-year due to an increase in losses due to defaults of corporate borrowers. Actual loss amounts have basically maintained at lower levels than the estimated losses at the beginning of the term, for the three fiscal years stated above.

# d. Exposure to Specialized Lending Products Subject to Supervisory Slotting Criteria by RW

# Amount of Specialized Lending Exposure Subject to Supervisory Slotting Criteria by RW

-		(Billions of yen
Classification	As of March 31, 2009	As of March 31, 2008
pecialized Lending exposure subject to supervisory slotting criteria	763	917
Specialized Lending, excluding High-Volatility Commercial Real Estate (HVCRE)	591	742
Risk weight of 50%	55	117
Risk weight of 70%	280	419
Risk weight of 90%	150	151
Risk weight of 115%	5	12
Risk weight of 250%	24	0
Risk weight of 0% (default)	75	41
High-Volatility Commercial Real Estate (HVCRE)	171	174
Risk weight of 70%	66	41
Risk weight of 95%	3	69
Risk weight of 120%	10	10
Risk weight of 140%	10	42
Risk weight of 250%	81	11
Risk weight of 0% (default)	_	_

Notes: 1. "Specialized Lending" refers to loans for Project Finance (PF), Object Finance (OF), Commodity Finance (CF) and Income-Producing Real Estate (IPRE) (as defined in the Notification Regarding Capital Adequacy, Article 1-1-41).

2. "High-Volatility Commercial Real Estate (HVCRE)" refers to loans that are the financing of commercial real estate that exhibits a higher rate of loss volatility compared to other types of Specialized Lending, as specified in the Notification Regarding Capital Adequacy, Article 1-1-43.

3. "Specialized Lending exposure subject to supervisory slotting criteria" refers to the amounts of Specialized Lending, subject to the Bank's internal rating system, and have been allotted to the risk asset classifications given in the Notification Regarding Capital Adequacy, Article 130-3 and Article 130-5, after taking account of risk weights.

4. For risk weights, the Bank has applied the stipulations contained in the Notification Regarding Capital Adequacy, Article 130-3 and Article 130-5.

# e. Equity Exposure Subject to the Simple Risk-Weighted Method of the Market-Based Approach by RW

# Amount of Equity Exposure Subject to the Simple Risk-Weighted Method of the Market-Based Approach

		(Billions of yen)
Classification	As of March 31, 2009	As of March 31, 2008
Equity exposure subject to the simple risk-weighted method of the market-based approach by RW	41	92
Risk weight of 300%	_	
Risk weight of 400%	41	92

Note: The "simple risk-weighted method of the market-based approach by RW" is a method for computing the amount of risk-weighted assets of equity and other investments. Under this method, the market value of listed stocks is multiplied by a risk weight of 300%, and the estimated value of unlisted stocks is multiplied by a risk weight of 400% (Notification Regarding Capital Adequacy, Article 143-4).

#### (4) EXPOSURE SUBJECT TO STANDARDIZED APPROACH BY RISK WEIGHT

#### Overview

The Bank adopts Internal Rating Based Approach in computing risk assets. However, for the assets listed below, the Bank considers that the percentage of such assets in overall credit risk assets is minuscule and that they are not regarded as significant from a credit risk management perspective. Accordingly, the Bank partially applies the Standardized Approach specifically to those assets and does not plan to apply the IRB Approach to them.

- The on-balance sheet assets and off-balance sheet items of its consolidated subsidiaries, with the exception of Kyodo Housing Loan Co., Ltd.
- The following assets held by the Bank and Kyodo Housing Loan: Suspense payable (with the exception of payable account for securities), prepayment costs, among foreign currency forward contracts those for foreign currency deposits of cooperative organizations and current account overdrafts (to holders of the Bank's debentures).

Please note that Kyodo Housing Loan has adopted the Foundation Internal Ratings-Based Approach (F-IRB) from March 31, 2008.

The Bank applies the ratings of five qualified credit rating agencies (External Credit Assessment Institution (ECAI)) in computing its risk assets, namely Standard & Poor's, Moody's Investors Service, Fitch Ratings, Ltd., Rating & Investment Information, Inc. and Japan Credit Rating Agency, Ltd. The Bank, applies a risk weight of 100% to its exposure to corporate and others (excluding past due exposure for three months or more) in accordance with the Notification Regarding Capital Adequacy, Article 44, regardless of the ratings assigned by these qualified rating agencies.

#### Amount of Exposure Subject to Standardized Approach

(Billions of yen)

Classification	As of Ma	rch 31, 2009	As of Mar	As of March 31, 2008		
Classification	Exposure	Refer to ECAI	Exposure	Refer to ECAI		
Exposure subject to Standardized Approach	57	_	53			
Risk weight of 0%	29	_	14			
Risk weight of 10%	_	_	_	_		
Risk weight of 20%	2	_	21			
Risk weight of 35%	_	_	_			
Risk weight of 50%	1	1	1	1		
Risk weight of 75%	0	_	_	_		
Risk weight of 100%	22	_	14			
Risk weight of 150%	_	_	_			
Amount deducted from capital	_	_	_	_		
Others	1	_	1			

Notes: 1. Others include investment funds which are measured credit risk assets by look-through approach and the assets which are more than 150% risk weight. 2. Exposure subject to Standardized Approach as securitization exposure is included.

# 4. Methods of Credit Risk Mitigation Techniques (Consolidated)

# Overview of Risk Management Policy and Procedures Related to Credit Risk Mitigation Techniques

#### Outline of Evaluation, Administrative Policy and Procedures for Collateral

The Bank regards future cash flows generated from the businesses it lends to as the normal source of funds for recovery of its claims on those businesses. Collateral is viewed only as a supplement to cash flow. The recovery of claims from collateral occurs when the debtor experiences difficulty in meeting its obligations. Thus, the Bank applies the collateral evaluation methods to ensure that the valuation of the collateral would not fall below actual recoveries from the collateral.

The Bank evaluates collateral in line with the objective data such as reports of appraisers, official land valuations for inheritance tax purposes, and market value. The Bank has established procedures for such evaluations to avoid wide variations in assessments. In addition, the Bank also stipulates the frequency of collateral valuation update according to types of collateral and the credit condition of obligors in its procedures. The Bank also implements the mechanism to ensure the timely collateral valuation update, such as self-assessment exercise or management plan update exercise for each obligor. The Bank applies haircut to the result of collateral valuation to calculate the estimate for recovery amount from collateral, and uses that estimate as an expected recovery amount for the purpose of credit analysis or provision for possible loan losses. Even in the case of valuations of real estate, the type of collateral for which precision of valuation may vary according to the methods employed, the result of valuation is done by adjusting haircut.

In addition, when evaluating the credit strength of guarantors, the Bank basically assigns internal ratings. Based on the assigned rating, the Bank determines the value the Bank applies to the guarantee as security for its claims.

As a part of collateral management, the Bank stipulates the procedures of reviewing the legal efficacy and enforceability of collateral not only at the time of the collateral pledge but also periodically.

# Principal Types of Collateral

The principal types of collateral are securities, commercial notes and real estate.

### Types of Guarantors and Principal Counterparties in Credit Derivatives and Explanation of Their Credit Standing

The types of guarantors in such transactions are mainly sovereigns, including central governments and local governments, and high grade corporates. Note that there is no transaction which uses credit derivatives for the credit risk mitigation.

# Credit Risk Mitigation Techniques

The principal methods adopted by the Bank to mitigate credit risk are as follows.

#### **Eligible Financial Collateral**

Taking account of the conditions stated in the Notification Regarding Capital Adequacy (the Notification) and the Bank's operating practices, the Bank adopts the following methods for accepting monetary assets as collateral to mitigate credit risk: (1) for repo-type transactions, the Bank recognizes the effectiveness of credit risk mitigation as stipulated in Notification Regarding Capital Adequacy and (2) other than repo-type transactions, the Bank recognizes the effectiveness of credit risk mitigation only in case if deposits with the Bank (including Norinchukin Bank Debentures) or stocks are pledged as collateral. No other monetary assets are recognized effective to mitigate credit risk.

#### Other Eligible IRB Collateral

Taking account of the conditions stated in the Notification Regarding Capital Adequacy and the Bank's operating practices, the Bank does not recognize the effectiveness of credit risk mitigation for collateral such as real estate, commercial notes, and certain other assets as collateral.

# On-Balance Sheet Netting for Loans and Deposits

Taking account of the provisions of the Notification and the Bank's operating practices, the Bank does not recognizes the effectiveness of credit risk mitigation for deposits held with the Bank unless pledged as collateral.

#### Legally Binding Netting Contracts for Derivatives and Repo-Style Transactions

The Bank considers legally binding bilateral netting contracts for derivatives as a means of mitigating credit risk.

The Bank has a policy of entering into derivative transactions, in principle, only with counterparties with legally binding netting contracts.

In its administration of legally binding netting contracts, the Bank confirms the scope of transactions as and when necessary.

In addition, when the Bank calculates the amount of credit risk exposure, the Bank considers transactions made under the International Swap and Derivatives Association (ISDA) Master Agreement as transactions under legally binding netting agreements. Regarding repo-style transactions, although the Bank has concluded legally binding netting agreements with its major counterparties, taking account of the stipulations of the Notification and the Bank's operating practices, the Bank does not consider these agreements as a means of mitigating credit risk.

#### Information about (Market or Credit) Risk Concentrations arising from Credit Risk Mitigations

For exposure where the credit risk has been transferred from a guaranteed party to a guarantor, as a result of credit risk mitigation techniques, the Bank monitors the concentrations of credit risk, and manages exposures accordingly. Regarding market risk, there is no exposure of credit derivatives included in the Bank's trading accounts.

# Amount of Exposure Subject to Credit Risk Mitigation Techniques (Eligible Financial Collateral, Other Eligible IRB Collateral, Guarantees, Credit Derivatives)

Jerivatives)		(Billions of year
Classification	As of March 31, 2009	As of March 31, 2008
Foundation Internal Ratings-Based Approach	4,769	6,557
Eligible financial collateral	4,620	6,263
Corporate exposure	15	926
Sovereign exposure	—	
Bank exposure	4,604	5,337
Other eligible IRB collateral	—	
Corporate exposure	—	
Sovereign exposure	—	
Bank exposure	—	
Guarantees, credit derivatives	148	293
Corporate exposure	135	260
Sovereign exposure	13	33
Bank exposure	—	
Retail exposure secured by residential properties	—	
Qualifying revolving retail exposure	—	
Other retail exposure	—	
tandardized Approach		
Eligible financial collateral	—	
Guarantees, Credit Derivatives	_	

Notes: 1. The amount of exposure for which credit risk mitigation techniques have been used is limited to the portion for which such effects have been taken into account.

2. Exposure subject to treatment as credit risk exposure is not included.

# 5. Counterparty Credit Risk in Derivative Transactions (Consolidated)

# Overview of Risk Management Policy and Procedures for Counterparty Credit Risk in Derivatives and Transactions with a Long Settlement Period

### Policy for Allocation of Risk Capital and Credit Lines

To manage the credit risk involved in derivative transactions where the counterparty is a financial institution, the Bank places a ceiling according to the creditworthiness of the counterparty. The Bank sets a ceiling on unsecured exposure to financial institution groups according to the Bank's internal ratings and sectors of those groups. The Bank manages its total unsecured exposure to such groups, including the credit risk amount in derivative transactions, within the ceiling. This ceiling system is known as the "Bank Ceiling System." Within the limits of this ceiling, each of the front sections is allocated a position limit according to a specific entity within the group and a type of transaction (such as derivatives, loans, money market transactions). Exposures are managed so as not to exceed risk limits, including derivative transactions. Note that under the bank ceiling system, replacement costs, one component of current exposure in the BIS framework, are considered as the exposure amounts of derivatives to be managed. The ceiling on unsecured exposure, according to internal rating and sector, is approved by Credit Committee, including the member of the board in charge of risk management as a member of the committee. When the internal rating of the financial institution counterparty is downgraded due to a decline in creditworthiness, the ceiling may be automatically lowered. Compliance with the ceiling is monitored by the Risk Monitoring Division on a daily basis. When the total exposure exceeds a preset percentage limit, the Risk Monitoring Division sends a notice to the front section in charge and the Credit Risk Management Division. Based on this notice, Credit Risk Management Division and the relevant divisions consider and implement action plans. However, when an immediate action is required, instead of having discussion with the relevant divisions, Credit Risk Management Division exercises its authority and take immedate actions, such as ordering the front section to suspend any new transaction.

### Policy for Calculating the Value of Collateral as Security for Claims and Reserve for Possible Loan Losses

For derivative transactions, the Bank has concluded a Credit Support Annex (CSA) with its major counterparty among financial institutions. In some cases, the Bank receives collateral from these financial institution counterparties. The collateral to be posted may vary depending on the condition of a CSA entered, but it mainly consists of Japanese government bonds (JGBs), yen cash, U.S. Treasury bonds, and U.S. dollar cash. Regarding replacement costs, the Bank conducts self-assessment exercises and makes provisions to reserves for possible loan losses against possible replacement costs according to the internal rating of the financial institution counterparty.

#### Remarks on Impact in case the Bank is Required to Post Additional Collateral when the Bank's Credit Standing Deteriorates

In general, if the Bank's creditworthiness deteriorates, such as downgrading by credit rating agency, financial institution counterparty dealing with the Bank will reduce their credit risk limits and may request the Bank to post collateral. Especially under CSA agreements, the credit risk limits applicable to that bank are automatically adjusted according to the credit rating of a bank assigned by a rating agency. If the Bank's credit rating declines, it will be required to post collateral in accordance with its agreements. However, if the Bank has abundant holdings of liquid financial instruments, such as government bonds, it will have a sufficient level of assets to post as collateral, and Market Portfolio Management Committee monitors the level of these assets ongoing basis. For this reason, even if the Bank is required to post additional collateral, the impact on the Bank's activities will be minimal.

# Methods Used for Calculating Amount of Credit Exposure

The current exposure method is adopted.

#### Breakdown of the Amount of Credit Exposure

Classification		As of March 31, 2009	As of March 31, 2008
Total gross replacement costs (limited to items with a value of greater than zero)	(A)	124	994
Total gross add-ons	(B)	354	517
Gross credit exposure	(C) = (A)+(B)	479	1,512
Including, foreign exchange related		356	1,450
Including, interest rate related		110	54
Including, equity related		3	3
Including, credit derivatives		9	3
Amount of credit exposure before taking into account credit risk mitigation techniques due to collateral	(D)	321	180
Reduction in credit exposure due to netting contracts	(E) = (C)-(D)	157	1,331
Amount of collateral			0
Including eligible financial collateral		—	0
Amount of credit exposure after taking into account credit risk mitigation techniques due to collateral		157	1,331

Notes: 1. Derivatives transactions included in risk-weighted assets calculation for investment funds are not included.

2. Under the stipulations of the Notification Regarding Capital Adequacy, Article 56-1, the amount of credit exposure not computed has not been included.

(Billions of yen)

# Notional Principal Amount of Credit Derivatives Included in Computation of Credit Exposure

Classification	As of March 31, 2009	As of March 31, 2008
To buy protection	_	
Including credit default swaps		
To sell protection	91	79
Including credit default swaps	91	79
Notional principal amount of credit derivatives taking into consideration the effect of credit risk mitigation techniques		

Notes: 1. Credit derivatives included in risk-weighted assets for investment funds have not been taken into consideration.

2. Under the stipulations of the Notification Regarding Capital Adequacy, Article 10 and Article 56, the amount of credit risk assets not computed has not been included.

# 6. Securitization Exposure (Consolidated)

# Outline of Risk Management Policy and Procedures for Securitization Exposure

As part of its credit risk transactions, the Bank conducts transactions in securitized (structured finance) instruments. Securitized transactions have a certain type of assets as the underlying assets and make it possible to effectively and efficiently mitigate and acquire credit risk and other forms of risk. The Bank's policy is to continuously invest in such instruments while managing the risk arising from those transactions appropriately.

The Bank invests in securitization exposure as part of its policy of effectively generating earnings, globally from geographical perspective and from credit to individuals and corporations from a perspective of underlying assets. In terms of risk management framework for these investments, the Bank has established a risk management infrastructure of credit and market risk, including credit ceilings, internal ratings, self-assessment, and economic capital management. According to that framework, the Bank implements the cycle mainly consists of investment policy setting, due diligence (comprehensive analysis at the time of initial investment), credit analysis, execution, and monitoring.

In view of the risk profiles of securitization exposure, the Bank has established the process of risk evaluation, including the differentiation of approval limits on investment according to credit rating, assessment of methodology adopted by credit rating agency and quantitative analysis for repayment capability of the exposure. The Bank monitors the credit conditions of these investment products ongoing basis and performs analysis and assessment of market environments, considering performances of underlying assets.

Regarding its securitization exposure, the Bank appropriately calculates the amounts of credit risk assets based on the Notifications regarding Capital Adequacy. As part of its comprehensive risk management, it examines migrations in credit ratings. In addition, based on the risk properties of the securitization exposure, the Bank computes risk volumes and engages in other initiatives to enhance the accuracy and sophistication of its risk management. Please note that, as of March 31, 2009, the Bank has no securitization transaction in which the Bank acts as an originator and recognized effects of credit risk mitigation for a regulatory purpose.

### Computation of Risk-Weighted Assets for Credit Risk in Securitization Exposure

The Bank computes the amount of risk-weighted assets for securitization exposure by applying the "Ratings-Based Approach (RBA)," "Supervisory Formula (SF)" and "deduction from capital."

The Bank treats securitized instruments in accordance with the "Accounting Standards for Financial Products" and "Practical Guidelines for Accounting for Financial Products" for accounting purpose.

To determine risk weights assigned to its securitization exposure, the Bank uses five qualified rating agencies (External Credit Assessment Institution (ECAI)): Standard & Poor's, Moody's Investors Service, Fitch Ratings, Ltd., Rating & Investment Information, Inc., and Japan Credit Rating Agency, Ltd.

### Detail of Securitization Exposure Held as Originator

Detail of Securitization Exposure field as originator		(Billions of y	
Classification	As of March 31, 2009	As of March 31, 2008	
Total amount of underlying assets	—	_	
Amounts of securitization exposure	—		
Increase in capital due to securitization transactions	_		
Deducted from capital	_	_	
Amounts of securitized exposure	_	_	
Gains (losses) on sales of securitization transactions	_	_	

As of March 31, 2009, the Bank has not been an originator for securitization exposure, having effects of credit risk mitigation.

# Details of Securitization Exposure Held as Investor by Exposure Type

	As of Mar	rch 31, 2009
Classification	Amount of exposure	Deductions from capital
Total amount of securitization exposure	6,171	79
Individuals		
Asset-Backed Securities (ABS)	2,649	18
Residential Mortgage-Backed Securities (RMBS)	652	1
Real estate		
Commercial Mortgage-Backed Securities (CMBS)	604	1
Corporates		
Subtotal of CDOs (CLO, ABS-CDO, CBO)	2,194	40
Collateralized Loan Obligations (CLO)	1,908	30
Asset-Backed Securities CDOs (ABS-CDO)	217	9
Collateralized Bond Obligations (CBO)	69	_
Others	70	18

		(Billions of yen)
	As of Mar	rch 31, 2008
Classification	Amount of exposure	Deductions from capital
Total amount of securitization exposure	6,042	23
Individuals		
Asset-Backed Securities (ABS)	1,841	
Residential Mortgage-Backed Securities (RMBS)	847	1
Real estate		
Commercial Mortgage-Backed Securities (CMBS)	751	_
Corporates		
Subtotal of CDOs (CLO, ABS-CDO, CBO)	2,515	0
Collateralized Loan Obligations (CLO)	1,997	
Asset-Backed Securities CDOs (ABS-CDO)	412	0
Collateralized Bond Obligations (CBO)	105	_
Others	86	21

Note: "Deduction from capital" is equity exposure deducted from capital under Article 224 of the Notification Regarding Capital Adequacy.

# Amount of Securitization Exposure Held as Investor and Regulatory Required Capital by Risk-Weighted Category

Regulatory Required Capital by Ris	k-weighted O	ategory		(Billions of year	
	As of Mare	ch 31, 2009	As of Marc	As of March 31, 2008	
Classification	Classification Amount of exposure Rec		Amount of exposure	Regulatory Required Capital	
Amount of securitization exposure	6,171	194	6,042	112	
Risk weight: 20% or less	5,418	43	5,441	48	
Risk weight: exceeding 20% to 50% or less	292	8	249	7	
Risk weight: exceeding 50% to 100% or less	197	13	266	18	
Risk weight: exceeding 100% to 250% or less	128	22	48	9	
Risk weight: exceeding 250% to less than 1,250%	55	26	13	6	
Deductions from capital	79	79	23	23	

# **Risk-Weighted Assets Computed through Application of Appendix Article 15 of the Notification Regarding Capital Adequacy**

Not applicable

# 7. Market Risk (Consolidated)

# Methods for Computation of Market Risk Amount and Appropriate Valuation Method

The Bank utilizes an internal models approach to measure "general market risk in a trading account." The Bank applies the standardized method for measuring "individual risks in a trading account," "foreign currency exchange risk," "commodity risk," "assets and liabilities related to a trading account in consolidated subsidiaries" and "foreign currency exchange risk and commodity risk in consolidated subsidiaries."

The financial products handled in a trading account, for which the internal models approach is applied to measure general market risk, are limited to products and transactions with abundant liquidity, such as interest rate futures, bond futures, interest rate swaps and other items. In computing the amount of market risk within "general market risk in a trading account," the Bank takes account of the profiles of the products handled and assumes a holding period of 10 business days.

### Computation of the Market Risk Amount by the Internal Models Approach Scope of Market Risk Amounts Computed by the Internal Models Approach

The model covers general market risk within a trading account. The scope is the same on a consolidated and non-consolidated basis. The following risks are computed according to the standardized method: individual risks in a trading account, foreign currency exchange risk, commodity risk and all the market risks with consolidated subsidiaries.

## Descriptions of the Internal Models Approach

- (1) Applied Method: Variance-covariance matrix
- (2) Holding period: 10 business days
- (3) Confidence interval: Computations assume a standard normal distribution, a 99th percentile, one-tailed confidence interval. (Computed for a holding period of one business day by multiplying by the square root of 10)

(Millions o		
	Fiscal 2008	Fiscal 2007
Base date of computation	2009. 3. 31	2008. 3. 31
VaR (For the most recent 60 business days)		
Base date of computation	333	170
Maximum	531	532
Minimum	138	137
Average	258	252

# Amounts of Market Risk

VaR

			(Millions of yen)
		Fiscal 2008	Fiscal 2007
For the portion computed with the internal models approach (B)+(E)	(A)	776	859
Value at Risk (MAX (C, D))	(B)	776	859
Amount on base date of computation	(C)	333	170
Amount determined by multiplying (F) by the average for the most recent 60 business days	(D)	776	859
Additional amount at the time of measuring individual risk	(E)	0	0
(Multiplier)	(F)	3.0	3.4
(Times exceeding VaR in back testing)	(G)	2	5

Note: With regard to validation of the Bank's internal model, the amount of risk calculated by the model is compared with the volatilities in actual profit and loss on a daily basis (known as back testing). When discrepancies between the model's estimates and actual results due to the designs of the model go beyond a certain level, the Bank scrutinizes the relevant model factors and revises the model if necessary.

# 8. Items for Equity Exposure (Consolidated)

(Includes items such as shares, excludes items in a trading account)

### Outline of Risk Management Policy and Procedures Related to Equity Exposure

The Bank's exposure to equity comprises stocks classified as other securities and stocks of subsidiaries and other associated companies. The amounts of risk-weighted assets for credit risk are computed by the methods specified by the Notifications Regarding Capital Adequacy. However, for internal management purposes, the Bank conducts comprehensive risk management within its economic capital management framework, as described in the section, "Norinchukin Risk Management."

#### Equities Classified as Other Securities

Risk management of equities classified as other securities is managed under a framework of overall market risk management (including interest rate risk and foreign currency exchange risk). That framework mainly consists of the economic capital management framework. Further details can be found in "Norinchukin Risk Management."

### Stocks of Subsidiaries and Other Associated Companies

The stocks of subsidiaries and other associated companies are recognized as credit risk assets and managed within the economic capital management framework.

# Principal Accounting Policies

For accounting purposes, among exposure to equity and other investments, stocks of subsidiaries and other associated companies are valued at cost, determined by the moving average method. Exposure to equity and other investments classified in other securities is valued at the market value prevailing on the date of the closing of accounts, in the case of equities with quoted market values (with book values mainly determined by the moving average method). Equities without market values are valued at cost, determined by the moving average method. In addition, the valuation difference on other securities is entered directly in the net assets account.

#### Computation of Risk-Weighted Assets Using the Internal Models Approach

The Bank applies the PD/LGD approach to calculation of risk-weighted assets for equity exposures, and the simple risk-weight method and internal model method for calculation under the market-based approach.

#### Amounts on the Balance Sheet and Market Value

	As of Mar	ch 31, 2009	As of March 31, 2008	
Classification	Amounts on the balance sheet	Market value	Amounts on the balance sheet	Market value
Equity exposure	477	477	825	825
Exposure to publicly traded equity	331	331	650	650
Exposure to privately held equity	145	145	175	175

Notes: 1. No stocks included in this table are fund-raising instruments of other financial institutions that the Bank holds deliberately as specified in the Notification Regarding Capital Adequacy, Article 8-1-1.

2. Regarding "market value," equities with quoted market values are evaluated at market, and those without market values are valued using the total amounts entered in the balance sheet.

(Billions of yen)

## Amount of Gain (Loss) due to Sale or Write-Off

	Fiscal 2008		Fiscal 2007			
Item		Losses from sales			Losses from sales	
	of equities, etc.	of equities, etc.	equities, etc.	of equities, etc.	of equities, etc.	equities, etc.
Equity exposure	37	79	30	53	0	72

(Billions of yen)

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Note: Amounts reflect relevant figures posted in the consolidated income statements.

#### **Amount of Valuation Gains (Losses)**

		(Billions of yell)
Item	As of March 31, 2009	As of March 31, 2008
Amount of valuation gain (loss) recognized on the balance sheet and not recognized in the statements of operations	9	174

Notes: 1. Exposure is to equity shares issued by both domestic and overseas companies.

2. No stocks included in this table are fund-raising instruments of other financial institutions that the Bank holds deliberately, as specified in the Notification Regarding Capital Adequacy, Article 8-1-1.

# Unrealized Gains (Losses) Not Recognized on Consolidated Balance Sheets or Consolidated Statements of Income

Not applicable

### Amount Included in Supplementary Capital (Tier II)

#### Under Stipulations of the Notification Regarding Capital Adequacy, Article 6-1-1 (Billions of yen)

Item	As of March 31, 2009	As of March 31, 2008
Amount included in supplementary capital under the stipulations of the		
Notification Regarding Capital Adequacy, Article 6-1-1		

Note: "Amount included in supplementary capital under the stipulations of the Notification Regarding Capital Adequacy, Article 6-1-1" is 45% of the total value of exposure to equity and other investments (excluding equities, etc., that are fund-raising instruments of other financial institutions that the Bank holds deliberately, as specified in the Notification Regarding Capital Adequacy, Article 8-1-1) classified under other securities at market value, minus the total book value of these securities.

# Equity Exposure Subject to Treatment Under the Notification Regarding Capital Adequacy, Appendix Article 13

Regarding Capital Adequacy, Appendix Article 15		
	As of March 31, 2009	As of March 31, 2008
Classification	Amounts on the balance sheets	Amounts on the balance sheets
Equity exposure subject to treatment under the Notification Regarding Capital Adequacy, Appendix Article 13	322	495
Corporate	310	480
Bank	6	9
Sovereign	5	5

Note: Appendix Article 13 of the Notification Regarding Capital Adequacy specifies provisional methods for calculating the value of credit risk assets in exposure to equity and other investments that meets certain specified standards.

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# 9. Exposure Subject to Risk-Weighted Asset Calculation for Investment Fund (Consolidated)

# Overview of Risk Management and Procedures Related to Exposure Subject to Risk-Weighted Asset Calculation for Investment Fund

Exposure subject to risk-weighted asset calculation for the investment fund consists mainly of assets managed in investment trusts and money trusts and include equities, bonds and credit assets, which are the Bank's primary investment assets. Risk management policies are stipulated for each category of the asset classes. An outline is provided in the section "Norinchukin Risk Management." In addition to direct investment, the Bank allocates investments to funds. Relevant procedures are described in "Policies and Procedures for Management of Fund Investments." Risk is managed by applying methods appropriate for various asset categories. When these assets are entrusted with managers, the Bank performs through due-diligence, including on operating systems, risk management systems, compliance framework, management philosophy and strategies as well as past performance of the managers to be chosen, before making decisions for manager selection. In addition, after entrusting these assets to managers, the Bank monitors their performance from quantitative and qualitative perspectives and conducts reviews of performance on a continuous basis to assess whether to continue or replace individual managers.

#### Amount of Exposure Subject to Risk-Weighted Asset Calculation for Investment Fund

	As of Ma	arch 31, 2009	As of March 31, 2008	
Classification	Exposure	(For reference) Weighted-average risk weight	Exposure	(For reference) Weighted-average risk weight
Look-through approach	13,072	69%	17,608	64%
Majority approach	541	337%	861	365%
Mandate approach	_			
Market-based approach	1,258	235%	2,873	184%
Others (simple approach)	274	448%	381	459%
Total	15,147	98%	21,725	94%

Notes: 1. The "Look-through approach" is a method for computing the risk-weighted assets in fund by totaling the amount of risk-weighted assets for credit risk in individual asset categories. (Please refer to Notification Regarding Capital Adequacy, Article 144-1.)

2. The "Majority approach" is a method for computing the risk-weighted assets in fund by applying risk weight to the fund as well as equity exposure when the exposure of equity, in terms of value, is major in a fund. (Please refer to the Notification Regarding Capital Adequacy, Article 144-2.)

3. The "Mandate approach" is a method for computing the risk-weighted assets in fund where only the investment mandate of the fund is known. The risk-weighted assets are computed as follows; It is assumed that the fund first invests, to the maximum extent allowed under its mandate, in the asset classes attracting the highest capital requirement, and then continues making investments in descending order until the maximum total investment level is reached. (Please refer to the Notification Regarding Capital Adequacy, Article 144-3.)

4. The "Market-based approach" is a method for computing the credit risk of exposure regarded as credit risk assets using the Bank's internal model (which is a value-at-risk (VaR) model based on the historical simulation method). (Please refer to the Notification Regarding Capital Adequacy, Article 144-4.)

5. The "Others (simple approach)" is a method for computing the risk-weighted assets in fund by applying risk weight of 400%, when it is judged the probability that the weighted-average risk weight will be less than 400%. In all other cases, risk weight of 1,250% is applied to funds. (Please refer to the Notification Regarding Capital Adequacy, Article 144-5.)

6. (For reference) Weighted-average risk weight = [Total risk-weighted assets + (Expected losses + Deductions from capital) / 8%] / EAD

# 10. Interest-Rate Risk (Consolidated)

(Interest-rate risk (excluding trading account) is the gain or loss from interest-rate shocks or the increase or decrease in economic value used for internal management purposes.)

### Overview of Risk Management and Procedures for Interest-Rate Risk

As described in the section of "Norinchukin Risk Management," in its economic capital management, the core concept of the Bank's risk management framework, the principal business model is the globally diversified investments. Accordingly, the Bank manages risk by taking into account correlation among or within asset classes, principally bonds, equities, credit assets, and diversification effects among asset classes.

In managing "interest-rate risk," the Bank analyzes interest-rate risk by performing scenario analysis on profit-and-loss impact simulations based on many types of scenarios and carries out various types of interest-rate sensitivity analysis, including BPV and yield-curve risk. In addition, the Bank conducts static and dynamic profit-and-loss impact analyses in major currencies. The Bank manages interest-rate risk in the banking book through a framework to properly capture the impact from interest-rate risk arising from various factors. Combining this type of interest-rate risk management with the management of other major risks, the Bank has established checkpoints for application of its Internal Capital Adequacy Assessment Process (ICAAP). By conducting sets of stress testing and implementing other measures, the Bank always ensures the proper operation of risk management at all times, from the point of view of the assessment of capital adequacy as well.

# Crucial Assumptions for Interest-Rate Risk Management, Frequency of Risk Measurement

As mentioned in the previous section, the core of the Bank's risk management activities is economic capital management. The Bank measures the risk of its securities portfolio on a daily basis. In the banking book, the Bank's internal rule applies one year holding period and five year historical observation period as criteria for interest-rate risk volatility measurements. The Bank calculates the declines in economic value on a monthly basis by taking the first and 99th percentile risk measure. Note that in principle, these measurements cover all financial assets and liabilities, while the measurement process does not take account of inter-grid factors and correlations with other assets at all.

### Interest-Rate Risk Volume Computed with the Internal Model in Core Business Accounts (The Banking Accounts)

		(Billions of yen)
Classification	As of March 31, 2009	As of March 31, 2008
Interest-rate risk	1,125	1,290
Yen interest-rate risk	6	(62)
U.S. dollar interest-rate risk	1,014	1,214
Euro interest-rate risk	97	114
Interest-rate risk in other currencies	6	23

Notes: 1. Interest-rate risk in consolidated subsidiaries is limited in view of the size of their assets, so the interest-rate risk volume for the Bank on a nonconsolidated basis is shown here.

2. Regarding core deposits, since the balances of deposits, etc., without maturity dates are limited, the Bank does not currently measure their risk volume. In addition, regarding repayments of mortgage-backed securities and callable securities before maturity, risk volume is measured after taking account of negative convexity and option vega due to call conditions and other factors.

# 1. Capital Structure (Non-Consolidated)

### (1) CAPITAL ADEQUACY RATIO (NON-CONSOLIDATED)

#### Non-Consolidated Capital Adequacy Ratio (Basel capital adequacy standards) (Basel II)

Note: The Bank's capital adequacy ratio for the fiscal year ended March 31, 2009 and 2008, was computed according to Basel II.

As of March 31

Items		Millions of yen		Millions of U.S. dollars	
		2009	2008	2009	
Tier I capital	Capital stock		3,421,370	2,016,033	34,823
	Included as non-cumulative, perpetual preferred stock		24,999	24,999	254
	Deposit for subscription to preferred stock				
	Capital surplus		25,020	25,020	254
	Earned surplus		788,617	1,353,122	8,026
	Less: Amount corresponding to the decrease in capital due to merger of subsidiaries		_		_
	Less: Treasury stock				_
	Deposit for subscription to treasury stock				_
	Unrealized loss on other securities		(1,871,867)	(296,521)	(19,052)
	Foreign currency transaction adjustment		(19)	(16)	(0)
	Stock aquisition rights		_		_
	Less: Amount corresponding to operating rights				_
	Less: Goodwill and others				_
	Less: Amount corresponding to the increase in capital due to securitization transactions				_
	Less: Amount equivalent to 50% expected losses in excess of qualifying allowance		62,479	77,767	635
	Subtotal	(A)	2,300,641	3,019,870	23,416
	Including preferred securities with interest rate step-up clause				
	(Ratio of the value of such preferred securities to Tier I capital)				_
	45% of unrealized gains on other securities				_
	45% of unrealized gains on land		23,231	24,147	236
	General reserve for possible loan losses		43	17	0
Tier II	Qualifying subordinated debt		1,746,775	1,301,395	17,778
capital	Included as perpetual subordinated bonds and loans		1,476,057	963,700	15,023
	Included as dated subordinated bonds, loans, and preferred stock	ζ.	270,718	337,695	2,755
	Subtotal		1,770,051	1,325,560	18,015
	Tier II capital included as qualifying capital	(B)	1,770,051	1,325,560	18,015
Tier III	Short-term subordinated debt		_		_
capital	Including amount added to capital	(C)			_
Deductions	Deductions	(D)	327,154	304,516	3,329
Total Capital	(A)+(B)+(C)-(D)	(E)	3,743,538	4,040,915	38,102
	Risk-weighted assets for credit risk	(F)	22,421,771	29,096,583	228,211
	Including on-balance sheet		20,951,361	27,112,682	213,245
	Including off-balance sheet		1,470,409	1,983,900	14,966
Risk-	Assets equivalent to market risk	(G)	730,398	2,076,684	7,434
weighted assets	(For reference: actual market risk volume)	(H)	58,431	166,134	594
	Amount corresponding to operational risk (J)/8%	(I)	764,948	1,024,690	7,785
	(For reference: amount corresponding to operational risk)	(J)	61,195	81,975	622
	Total risk-weighted assets (F)+(G)+(I)	(K)	23,917,117	32,197,957	243,431
Basel II Capital Adequacy Ratio (Basel capital adequacy standards) = (E)/(K) × 100%			12.55%	15.65%	
	$Fier I ratio = (A)/(K) \times 100\%$		9.61%	9.37%	9.61%
	Non-Consolidated required capital		1,913,369	2,575,836	19,474

- Notes: 1. The Bank's capital adequacy ratio was computed according to the stipulations outlined in Notification No. 4 of the 2006 Financial Services Agency and the Ministry of Agriculture, Forestry and Fisheries of Japan (Standard for Judging the Management Soundness of the Norinchukin Bank) (hereinafter, Notification Regarding Capital Adequacy). Note that the Bank adopts Foundation Internal Ratings-Based Approach (F-IRB) in computing risk-weighted assets for credit risk and the Standardized Approach (TSA) in computing the amount corresponding to operational risk.
  - 2. Regarding the calculation of capital adequacy ratio, certain procedures were performed by Ernst & Young ShinNihon LLC pursuant to "Treatment of Inspection of Capital Ratio Calculation Framework Based on Agree-upon Procedures" (JICPA Industry Committee Report No. 30). It does not constitute a part of the audit on financial statements by law, but a review on agree-upon procedures on internal control of capital adequacy calculation. Accordingly, Ernst & Young ShinNihon LLC does not address any opinion as a result of the review.
  - 3. The Tier II capital item "general reserve for possible loan losses" is limited to the amount corresponding to assets which is calculated according to a Standardized Approach in terms of risk-weighted assets for credit risk.
  - 4. Those are items of Deductions: (1) the total amount of the value corresponding to intentional holdings of capital investments issued by other financial institutions, (2) 50% of the expected losses on exposure to corporate, sovereign and bank, and expected losses on retail exposure over the value of qualified reserves, (3) expected losses on equity exposure, and (4) securitization exposure subject to deduction from capital. (Notification Regarding Capital Adequacy, Article 20)
  - 5. In computing risk-weighted assets for credit risk, the Bank has applied a scaling factor of 1.06 to the amount of risk-weighted assets for credit risk computed based on its Foundation Internal Ratings-Based Approach (F-IRB), as provided for in the Notification Regarding Capital Adequacy, Article 129.

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# 2. Items for Capital Adequacy (Non-Consolidated)

(Minimum amount of regulatory required capital and breakdown for each risk category as required under Basel II)

### **Regulatory Required Capital**

				(Billions of yen	
	As of Mar	ch 31, 2009	As of March 31, 2008		
Items	EAD	Regulatory Required Capital	EAD	Regulatory Required EAD	
Amount of regulatory required capital for credit risk	75,645	2,233	73,492	2,704	
Exposure subject to Internal Ratings-Based Approach	75,628	2,231	73,482	2,703	
Corporate exposure (excluding Specialized Lending)	6,245	453	7,158	412	
Corporate exposure (Specialized Lending)	763	109	742	71	
Sovereign exposure	32,968	0	19,226	0	
Bank exposure	12,280	103	14,290	111	
Retail exposure	6	2	5	0	
Retail exposure secured by residential properties	_	_		_	
Qualifying revolving retail exposure	_	_		_	
Other retail exposure	6	2	5	0	
Securitization exposure	6,168	193	6,039	112	
Equity portfolios	528	70	869	127	
Equity portfolios subject to PD/LGD approaches	130	22	97	12	
Equity portfolios subject to simple risk-weighted method	41	13	91	30	
Equities under the internal models approach	9	4	162	40	
Grandfathered equity exposure	347	29	518	43	
Exposure subject to risk-weighted asset calculation for investment fund	16,105	1,263	24,619	1,839	
Other debt purchased	58	1	83	2	
Other exposures	502	32	447	24	
Exposure subject to Standardized Approach	16	1	10	0	
Overdrafts	0	0	0	0	
Prepaid expenses	6	0	6	0	
Suspense payments	10	0	3	0	
Other	_	_		_	
Amount of regulatory required capital for market risk	/	58	/	166	
Standardized Approach	/	57	/	165	
Interest rate risk category	/	_	/	_	
Equity risk category	/	_	/	_	
Foreign exchange risk category	/	57	/	165	
Commodity risk category	/	_	/		
Option transactions	/	_	/		
Internal models Approach	/	0	/	0	
Amount of regulatory required capital for operational risk	/	61	/	81	
Offsets on consolidation	/	2,352	/	2,952	

Notes: 1. Regulatory required capital for credit risk = 8% of risk-weighted assets for credit risk + Expected losses + Deductions from capital

2. "Risk-weighted asset calculation for investment fund" is risk-weighted assets as calculated according to the method specified in Notification Regarding Capital Adequacy, Article 144.

3. Article 13 of the Notification Regarding Capital Adequacy contains a grandfathering provision for computing the amount of risk assets related to equity exposures that meet specified criteria.

4. Under "The Standardized Approach (TSA)," which is a method for computing the amount corresponding to operational risk, the gross profit for one year is allocated among the business activities as specified in Appendix Table 1 of the Notification Regarding Capital Adequacy. The multiplier specified for each business activity classification is multiplied by the gross profit, and the average of the annual totals for the past three years is taken to be the amount corresponding to operational risk. (Notification Regarding Capital Adequacy, Article 282)

# 3. Items for Credit Risk (Non-Consolidated)

(Funds and securitization exposures are excluded.)

### (1) CREDIT RISK EXPOSURE

### For Fiscal 2008, ended March 31, 2009

### Geographic Distribution of Exposure, Details in Significant Areas

### by Major Types of Credit Exposure

(Billions of yen)

Region	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure	Default exposure
Japan	13,215	14,977	5	3,919	32,118	244
Asia except Japan	74	32	0	1,815	1,922	_
Europe	74	2,501	1	1,919	4,497	5
The Americas	274	8,064	2	6,523	14,865	1
Other areas	23	17	0	0	42	_
Total	13,663	25,592	9	14,179	53,445	252

#### Industry Distribution of Exposure, Details by Major Types of Credit Exposure

Industry	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure	Default exposure	Write-off of loans (amounts of partial direct write-off)
Manufacturing	2,340	282	1	0	2,623	50	5
Agriculture	44	0	_	0	44	5	1
Forestry	41	_	_		41	1	0
Fishing	36	_	—		36	26	2
Mining	18	1	_	0	19	_	_
Construction	161	17	_	0	179	5	1
Utility	147	48	0	0	196	_	_
Information/telecommunications	108	32		0	141	6	_
Transportation	706	69	3	0	778	10	_
Wholesaling, retailing	1,664	54	0	0	1,719	24	0
Finance and insurance	1,464	4,186	4	13,656	19,312	5	0
Real estate	463	160		0	624	87	1
Services	1,364	54	0	1	1,420	27	4
Municipalities	337	35	_	_	373	_	_
Other	4,762	20,651	_	519	25,933	0	0
Total	13,663	25,592	9	14,179	53,445	252	17

Note: "Others" within "Finance and insurance" includes repo-type transactions, call loans, and certain other items.

Term to maturity	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure			
In 1 year	9,861	5,128	0	12,068	27,059			
Over 1 year to 3 years	1,541	3,686	3	50	5,281			
Over 3 years to 5 years	1,389	4,890	0	6	6,287			
Over 5 years to 7 years	470	1,763	1	4	2,238			
Over 7 years	327	9,653	3	_	9,985			
No term to maturity	72	471	—	2,049	2,593			
Total	13,663	25,592	9	14,179	53,445			

#### Residual Contractual Maturity Breakdown of Credit Risk Exposure

Notes: 1. The amount of credit exposure at the end of the period does not substantially differ from the average-risk position during fiscal 2008. 2. Within credit risk exposure, credit risk exposure subject to the Standardized Approach was ¥16.9 billion.

3. Default exposure is classified in the Bank's self-assessment as being under "Debtor Under Requirement of Control."

#### For Fiscal 2007, ended March 31, 2008

### Geographic Distribution of Exposure, Details in Significant Areas by Major Types of Credit Exposure

by Major Types of Credit E									
Region	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure	Default exposure			
Japan	12,472	9,404	88	4,906	26,872	214			
Asia except Japan	70	27	9	1,528	1,635	_			
Europe	113	3,224	485	3,148	6,972	1			
The Americas	289	5,827	273	2,165	8,556	_			
Other areas	30	19	3	0	54				
Total	12,977	18,504	860	11,749	44,091	216			

Industry	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure	Default exposure	Write-off of loans (amounts of partial direct write-off)
Manufacturing	2,243	431	1	0	2,676	45	3
Agriculture	44	0	_	0	44	6	0
Forestry	44	_	_	0	44	1	0
Fishing	39			0	39	29	0
Mining	15	1	_	0	16		
Construction	161	12		0	173	1	
Utility	146	56	0	0	202		_
Information/telecommunications	103	36	_	0	139	0	_
Transportation	668	95	2	0	767	12	_
Wholesaling, retailing	1,668	78	1	0	1,747	26	0
Finance and insurance	1,552	5,416	854	10,628	18,452	4	_
Real estate	535	211	0	0	746	39	_
Services	1,319	57	0	1	1,378	48	2
Municipalities	424	44	_	0	468		_
Other	4,009	12,063	0	1,119	17,192	0	_
Total	12,977	18,504	860	11,749	44,091	216	6

### Industry Distribution of Exposure, Details by Major Types of Credit Exposure

(Billions of yen)

Note: "Others" within "Finance and insurance" includes repo-type transactions, call loans, and certain other items.

### **Residual Contractual Maturity Breakdown of Credit Risk Exposure**

Term to maturity	Loans, commit- ments, off-balance sheet exposure	Securities	Derivatives	Others	Total credit risk exposure					
In 1 year	9,448	452	146	9,688	19,735					
Over 1 year to 3 years	1,659	2,468	708		4,837					
Over 3 years to 5 years	1,155	2,991	0	57	4,205					
Over 5 years to 7 years	337	1,218	0	3	1,560					
Over 7 years	358	10,604	3	661	11,627					
No term to maturity	17	769		1,337	2,124					
Total	12,977	18,504	860	11,749	44,091					

Notes: 1. The amount of credit exposure at the end of the period does not substantially differ from the average-risk position during fiscal 2007.

2. Within credit risk exposure, credit risk exposure subject to the Standardized Approach was ¥10.3 billion.

3. Default exposure is classified in the Bank's self-assessment as being under "Debtor Under Requirement of Control."

### (2) RESERVES FOR POSSIBLE LOAN LOSSES

Increase/Decrease in General Reserve for Possible Loan Losses, Specific Reserve for Possible Loan Losses and the Specific Reserve for Loans to Countries with Financial Problems by Region

Region	As of March 31, 2009	As of March 31, 2008	Increase/(decrease)
General reserve for possible loan losses	47	40	7
Specific reserve for possible loan losses	100	86	13
Japan	98	84	14
Asia except Japan	_		
Europe	1	1	(0)
The Americas	0		0
Other areas	_		_
Specified reserve for loans to countries with financial problems	_	0	(0)
Total	147	126	21

Increase/Decrease in General Reserve for Possible Loan Losses, Specific Reserve for Possible Loan Losses and the Specified Reserve for Loans to Countries with Financial Problems by Industry

Industry	As of March 31, 2009	As of March 31, 2008	Increase/(decrease)
General reserve for possible loan losses	47	40	7
Specific reserve for possible loan losses	100	86	13
Manufacturing	12	9	3
Agriculture	2	3	(0)
Forestry	0	0	(0)
Fishing	13	15	(1)
Mining	_		
Construction	0	0	0
Utility	_		
Information/telecommunications	3	0	2
Transportation	6	8	(2)
Wholesaling, retailing	15	17	(1)
Finance and insurance	1	0	1
Real estate	35	15	19
Services	7	14	(6)
Municipalities	_		
Other	_	0	(0)
Others	_		_
Specified reserve for loans to countries with financial problems	_	0	(0)
Fotal	147	126	21

### (3) EXPOSURE SUBJECT TO THE INTERNAL RATINGS-BASED APPROACH

#### a. Corporate, Sovereign and Bank Exposure

Fiscal 2008 (Ended March 31, 2009)

		1				(Billions of year
Ratings	Weighted- average PD	Weighted- average LGD	Weighted-average risk weight	EAD	EAD (on-balance sheet)	EAD (off-balance sheet)
Corporate Exposure	4.70%	44.88%	91%	6,245	5,527	717
1-1 to 4	0.18%	44.99%	38%	4,598	3,968	629
5 to 7	2.74%	44.49%	130%	1,001	945	55
8-1 to 8-2	19.53%	44.70%	355%	482	454	27
Subtotal	2.14%	44.89%	78%	6,082	5,369	713
8-3 to 10-2	100.00%	44.71%	560%	163	158	4
Sovereign Exposure	0.00%	45.00%	0%	32,968	27,817	5,151
1-1 to 4	0.00%	45.00%	0%	32,968	27,817	5,151
5 to 7	7.78%	45.00%	211%	0	0	_
8-1 to 8-2	_	_	_	_	_	_
Subtotal	0.00%	45.00%	0%	32,968	27,817	5,151
8-3 to 10-2	_	_	_	_	_	_
Bank Exposure	0.06%	25.50%	11%	12,280	6,304	5,975
1-1 to 4	0.05%	25.48%	10%	12,255	6,287	5,967
5 to 7	2.66%	42.40%	153%	17	10	7
8-1 to 8-2	7.07%	20.73%	103%	7	6	0
Subtotal	0.06%	25.50%	10%	12,279	6,304	5,975
8-3 to 10-2	100.00%	45.00%	563%	0	0	0
Equity Exposure for Credit Risk Using Internal Ratings: PD/LGD Approach	1.80%	90.00%	220%	130	123	7
1-1 to 4	0.17%	90.00%	141%	96	96	_
5 to 7	4.75%	90.00%	424%	33	25	7
8-1 to 8-2	19.91%	90.00%	783%	0	0	_
Subtotal	1.42%	90.00%	216%	129	122	7
8-3 to 10-2	100.00%	90.00%	1,125%	0	0	_

Notes: 1. Weighted averages of PD, LGD and risk weights are computed based on EAD (including on-balance and off-balance items).

2. Risk weights are equivalent to 8% of the total of the amount of risk-weighted assets and expected loss, divided by EAD.

3. "Equity Exposure for Credit Risk Using Internal Ratings: PD/LGD Approach" does not take account of Rider No. 13 to the Notification Regarding Capital Adequacy (regarding provisional measures for equity exposure).

Ratings	Weighted-	Weighted-	Weighted-average	EAD		
Kaungs	average PD	average LGD	risk weight	EAD	EAD (on-balance sheet)	EAD (off-balance sheet)
Corporate Exposure	3.81%	39.03%	72%	7,158	5,211	1,947
1-1 to 4	0.15%	37.33%	28%	5,475	3,680	1,794
5 to 7	1.65%	44.48%	109%	1,090	983	107
8-1 to 8-2	19.20%	44.62%	353%	427	385	41
Subtotal	1.55%	38.89%	61%	6,993	5,050	1,943
8-3 to 10-2	100.00%	44.70%	560%	164	161	3
Sovereign Exposure	0.00%	46.15%	0%	19,226	18,131	1,094
1-1 to 4	0.00%	46.15%	0%	19,225	18,131	1,094
5 to 7	7.78%	45.00%	218%	0	0	
8-1 to 8-2			_	_	_	
Subtotal	0.00%	46.15%	0%	19,226	18,131	1,094
8-3 to 10-2		_		_		
Bank Exposure	0.05%	25.74%	10%	14,290	6,736	7,554
1-1 to 4	0.04%	25.71%	9%	14,262	6,716	7,546
5 to 7	2.50%	45.00%	157%	16	10	6
8-1 to 8-2	7.07%	27.86%	142%	10	10	0
Subtotal	0.04%	25.73%	10%	14,290	6,736	7,554
8-3 to 10-2	100.00%	45.00%	563%	0	0	0
Equity Exposure for Credit Risk Using Internal Ratings: PD/LGD Approach	0.80%	90.00%	158%	97	97	_
1-1 to 4	0.16%	90.00%	145%	92	92	—
5 to 7	2.06%	90.00%	304%	3	3	_
8-1 to 8-2	19.91%	90.00%	783%	0	0	_
Subtotal	0.28%	90.00%	153%	96	96	_
8-3 to 10-2	100.00%	90.00%	1,125%	0	0	_

### Fiscal 2007 (Ended March 31, 2008)

Notes: 1. Weighted averages of PD, LGD and risk weights are computed based on EAD (including on-balance and off-balance items).

2. Risk weights are equivalent to 8% of the total of the amount of risk-weighted assets and expected loss, divided by EAD.

3. "Equity Exposure for Credit Risk Using Internal Ratings: PD/LGD Approach" does not take account of Rider No. 13 to the Notification Regarding Capital Adequacy (regarding provisional measures for equity exposure).

#### **b. Retail Exposure**

### Fiscal 2008 (Ended March 31, 2009) Details on PD, LGD, RW and EAD Assets

(Billions of yen)

Type of exposure	Weighted- average PD	Weighted- average LGD	Weighted- average LGD default	Weighted- average EL default	Weighted- average risk weight	EAD	EAD (on- balance sheet)	EAD (off- balance sheet)
Retail exposure secured by residential properties	4.72%	41.97%	84.82%	78.39%	80%	330	330	_
Not default Not delinquent	0.41%	42.01%	/	/	31%	301	301	
Not default Delinquent	22.31%	41.26%	/	/	348%	18	18	
Not default Subtotal	1.68%	41.97%	/	/	49%	320	320	_
Default	100.00%	/	84.82%	78.39%	1,060%	10	10	_
Qualifying revolving retail exposure	_	_	_	_	_	_	_	_
Not default Not delinquent	_		1	/	_	_	_	_
Not default Delinquent	_		/	/	_	_	_	
Not default Subtotal	_	_	1	1	_	_	_	
Default	_	/	_	_	_	_	_	_
Other retail exposure	20.47%	78.48%	103.04%	94.78%	322%	9	4	5
Not default Not delinquent	1.44%	78.32%	/	1	88%	7	2	4
Not default Delinquent	22.23%	82.40%	1	1	397%	0	0	0
Not default Subtotal	2.26%	78.48%	1	1	100%	7	2	4
Default	100.00%	/	103.04%	94.78%	1,288%	1	1	0
Total	5.17%	43.01%	87.57%	80.86%	87%	340	335	5
Not default Not delinquent	0.43%	42.90%	1	1	32%	309	304	4
Not default Delinquent	22.31%	41.94%	1	1	349%	18	18	0
Not default Subtotal	1.70%	42.85%	/	/	50%	328	323	4
Default	100.00%	/	87.57%	80.86%	1,095%	12	11	0

Notes: 1. Purchased retail receivables in investment funds have been included in the amount subject to quantitative disclosure.

2. "Not default Delinquent" is not falling under a default definition in the Notification Regarding Capital Adequacy, but past-due.

3. Risk weights are equivalent to the total of the risk-weighted assets and the amount of dividing the expected loss by 8%, then dividing the result by exposure at default (EAD).

4. For defaulted exposure, the risk weights have been computed taking account of the unexpected losses on default (LGD default) and the expected losses on default (EL default).

5. As of March 31, 2009, the Bank held no Qualifying revolving retail exposure for which net withdrawals of commitments had occurred.

## Fiscal 2007 (Ended March 31, 2008) Details on PD, LGD, RW and EAD Assets

	Weighted-	Weighted-	Weighted- average	Weighted- average	Weighted- average		EAD (on-	EAD (off-
Type of exposure	average PD	average LGD	LGD default	EL default	risk weight	EAD	balance sheet)	balance sheet)
Retail exposure secured by residential properties	3.75%	42.80%	84.48%	79.07%	69%	372	372	_
Not default Not delinquent	0.40%	42.83%	/	/	31%	347	347	
Not default Delinquent	23.18%	42.04%	/	/	360%	16	16	
Not default Subtotal	1.40%	42.80%	/	/	45%	363	363	
Default	100.00%	/	84.48%	79.07%	1,056%	8	8	
Qualifying revolving retail exposure								
Not default Not delinquent			/	/			_	_
Not default Delinquent			/	/				
Not default Subtotal			/	/				_
Default		/						
Other retail exposure	8.89%	50.28%	55.15%	51.42%	106%	34	29	5
Not default Not delinquent	1.49%	50.38%	/	/	56%	30	25	5
Not default Delinquent	18.47%	48.30%	/	/	214%	1	1	0
Not default Subtotal	2.34%	50.28%	/	/	64%	32	27	5
Default	100.00%	/	55.15%	51.42%	689%	2	2	0
Total	4.19%	43.44%	78.36%	73.30%	73%	407	401	5
Not default Not delinquent	0.49%	43.45%	/	/	33%	378	373	5
Not default Delinquent	22.75%	42.62%	/	/	346%	17	17	0
Not default Subtotal	1.48%	43.41%	/	/	47%	396	390	5
Default	100.00%	/	78.36%	73.30%	979%	11	10	0

Notes: 1. Purchased retail receivables in investment funds have been included in the amount subject to quantitative disclosure.

2. "Not default Delinquent" is not falling under a default definition in the Notification Regarding Capital Adequacy, but past-due.

3. Risk weights are equivalent to the total of the risk-weighted assets and the amount of dividing the expected loss by 8%, then dividing the result by exposure at default (EAD).

4. For defaulted exposure, the risk weights have been computed taking account of the unexpected losses on default (LGD default) and the expected losses on default (EL default).

5. As of March 31, 2008, the Bank held no Qualifying revolving retail exposure for which net withdrawals of commitments had occurred.

#### c. Actual Losses on Exposure to Corporate, Sovereign, Bank, and Retail Exposure

### Actual Losses for the Previous Period, Comparison

#### with the Year before Last Results and Analysis of Causes

(Billions of yer				
Type of exposure	As of March 31, 2009	As of March 31, 2008	Increase/(decrease)	
Corporate exposure	23	6	16	
Sovereign exposure	_		—	
Bank exposure	_		—	
Equity exposure subject to PD/LGD approach	0	0	0	
Retail exposure secured by residential properties	_			
Qualifying revolving retail exposure	—		—	
Other retail exposure	0	0	0	

Note: Actual losses are defined as losses due to direct write-offs, partial direct write-offs, general reserves for possible loan losses and loan sales of exposure that defaulted up to the end of the previous period.

# Estimated Losses Depend on Historical Long-Term Results,

#### **Comparison with Actual Losses**

(Billions of year)							
Tune of our course	As of Marc	ch 31, 2009	As of Marc	h 31, 2008	As of March 31, 2007		
Type of exposure	Estimated losses Actual losses Estim		Estimated losses	Actual losses	Estimated losses	Actual losses	
Corporate exposure	45	23	28	6	27	18	
Sovereign exposure	1	_	1	_	1	_	
Bank exposure	0	_	0	_	0	_	
Equity exposure subject to PD/LGD approach	0	0	1	0	0	0	
Retail exposure secured by residential properties	_	_	_	_	_		
Qualifying revolving retail exposure	_	_	_	_	_	_	
Other retail exposure	0	0	0	0	0	0	

Notes: 1. Comparisons of estimated and actual long-term losses for 10 years accumulatively are scheduled to be disclosed from the year following the application of Basel II (the year ending March 31, 2007).

2. The scope of actual and estimated losses includes the following accounts on balance sheet: loans, foreign exchange, accrued interests in other assets, suspense payable and customers' liabilities for acceptances and guarantees, as well as securities without quoted market values, money trusts without quoted market values, and monetary claims purchased.

3. Estimated losses of each year are amount of expected losses.

# Year-on-year comparison of actual losses and factor analysis of difference between estimated losses and actual losses

For fiscal 2008 (ended March 31, 2009) the actual loss amount increased year-on-year due to an increase in losses due to defaults of corporate borrowers. Actual loss amounts have basically maintained at lower levels than the estimated losses at the beginning of the term, for the three fiscal years stated above.

# d. Exposure to Specialized Lending Products Subject to Supervisory Slotting Criteria by RW

## Amount of Specialized Lending Exposure Subject to Supervisory Slotting Criteria by RW

Classification	As of March 31, 2009	As of March 31, 2008
Specialized Lending exposure subject to supervisory slotting criteria	763	917
Specialized Lending, excluding High-Volatility Commercial Real Estate (HVCRE)	591	742
Risk weight of 50%	55	117
Risk weight of 70%	280	419
Risk weight of 90%	150	151
Risk weight of 115%	5	12
Risk weight of 250%	24	0
Risk weight of 0% (default)	75	41
High-Volatility Commercial Real Estate (HVCRE)	171	174
Risk weight of 70%	66	41
Risk weight of 95%	3	69
Risk weight of 120%	10	10
Risk weight of 140%	10	42
Risk weight of 250%	81	11
Risk weight of 0% (default)	_	_

Notes: 1. "Specialized Lending" refers to loans for Project Finance (PF), Object Finance (OF), Commodity Finance (CF) and Income-Producing Real Estate (IPRE) (as defined in the Notification Regarding Capital Adequacy, Article 1-1-41).

2. "High-Volatility Commercial Real Estate (HVCRE)" refers to loans that are the financing of commercial real estate that exhibits a higher rate of loss volatility compared to other types of Specialized Lending, as specified in the Notification Regarding Capital Adequacy, Article 1-1-43.

3. "Specialized Lending exposure subject to supervisory slotting criteria" refers to the amounts of Specialized Lending, subject to the Bank's internal rating system, and have been allotted to the risk asset classifications given in the Notification Regarding Capital Adequacy, Article 130-3 and Article 130-5, after taking account of risk weights.

4. For risk weights, the Bank has applied the stipulations contained in the Notification Regarding Capital Adequacy, Article 130-3 and Article 130-5.

### e. Equity Exposure Subject to the Simple Risk-Weighted Method of the Market-Based Approach by RW

# Amount of Equity Exposure Subject to the Simple Risk-Weighted Method of the Market-Based Approach

 (Billions of yen)

 Classification
 As of March 31, 2009
 As of March 31, 2008

 Equity exposure subject to the simple risk-weighted method of the market-based approach by RW
 41
 92

 Risk weight of 300%
 —
 —
 —

 Risk weight of 400%
 41
 92

Note: The "simple risk-weighted method of the market-based approach by RW" is a method for computing the amount of risk-weighted assets of equity and other investments. Under this method, the market value of listed stocks is multiplied by a risk weight of 300%, and the estimated value of unlisted stocks is multiplied by a risk weight of 400% (Notification Regarding Capital Adequacy, Article 143-4).

# (4) EXPOSURE SUBJECT TO STANDARDIZED APPROACH BY RISK WEIGHT

### Amount of Exposure Subject to Standardized Approach

(Billions of yen)

<u>()</u> :(;	As of Ma	As of March 31, 2009		rch 31, 2008
Classification	Exposure	Refer to ECAI	Exposure	Refer to ECAI
Exposure subject to Standardized Approach	16	_	10	_
Risk weight of 0%		_		
Risk weight of 10%	_	_		_
Risk weight of 20%		_		
Risk weight of 35%		_		
Risk weight of 50%		_		_
Risk weight of 75%		_		
Risk weight of 100%	16	_	10	
Risk weight of 150%	_	_		_
Amount deducted from capital	_	_		_
Others	_	_		_

(Billions of yen)

# 4. Methods of Credit Risk Mitigation Techniques (Non-Consolidated)

### Amount of Exposure Subject to Credit Risk Mitigation Techniques (Eligible Financial Collateral, Other Eligible IRB Collateral, Guarantees, Credit Derivatives)

Classification	As of March 31, 2009	As of March 31, 2008
oundation Internal Ratings-Based Approach	4,769	6,557
Eligible financial collateral	4,620	6,263
Corporate exposure	15	926
Sovereign exposure	—	
Bank exposure	4,604	5,337
Other eligible IRB collateral		
Corporate exposure		
Sovereign exposure	—	
Bank exposure	—	
Guarantees, credit derivatives	148	293
Corporate exposure	135	260
Sovereign exposure	13	33
Bank exposure	—	
Retail exposure secured by residential properties	—	
Qualifying revolving retail exposure	—	
Other retail exposure	—	
andardized Approach		
Eligible financial collateral		
Guarantees, Credit Derivatives	_	

Notes: 1. The amount of exposure for which credit risk mitigation techniques have been used is limited to the portion for which such effects have been taken into account.

2. Exposure subject to treatment as credit risk exposure is not included.

# 5. Counterparty Credit Risk in Derivative Transactions (Non-Consolidated)

(Dillions of you)

## Methods Used for Calculating Amount of Credit Exposure

The current exposure method is adopted.

### Breakdown of the Amount of Credit Exposure

			(Billions of yen)
Classification	As of March 31, 2009	As of March 31, 2008	
Total gross replacement costs (limited to items with a value of greater than zero)	(A)	124	994
Total gross add-ons	(B)	354	517
Gross credit exposure	(C) = (A) + (B)	479	1,512
Including, foreign exchange related		356	1,450
Including, interest rate related		110	54
Including, equity related		3	3
Including, credit derivatives		9	3
Amount of credit exposure before taking into account credit risk mitigation techniques due to collateral	(D)	321	180
Reduction in credit exposure due to netting contracts	(E) = (C) - (D)	157	1,331
Amount of collateral			0
Including eligible financial collateral			0
Amount of credit exposure after taking into account credit risk mitigation techniques due to collateral		157	1,331

Notes: 1. Derivatives transactions included in risk-weighted assets calculation for investment funds are not included.

2. Under the stipulations of the Notification Regarding Capital Adequacy, Article 56-1, the amount of credit exposure not computed has not been included.

# Notional Principal Amount of Credit Derivatives Included in Computation of Credit Exposure

Credit Exposure		(Billions of yen)
Classification	As of March 31, 2009	As of March 31, 2008
To buy protection	—	
Including credit default swaps	—	
To sell protection	91	79
Including credit default swaps	91	79
Notional principal amount of credit derivatives taking into consideration the effect of credit risk mitigation techniques	_	_

Notes: 1. Credit derivatives included in risk-weighted assets for investment funds have not been taken into consideration.

2. Under the stipulations of the Notification Regarding Capital Adequacy, Article 21-2 and Article 21-3, the amount of credit risk assets not computed has not been included.

(Billions of yen)

# 6. Securitization Exposure (Non-Consolidated)

### **Detail of Securitization Exposure Held as Originator**

		(Billions of yen)
Classification	As of March 31, 2009	As of March 31, 2008
Total amount of underlying assets	—	—
Amounts of securitization exposure	—	
Increase in capital due to securitization transactions	_	
Deducted from capital	_	
Amounts of securitized exposure	—	_
Gains (losses) on sales of securitization transactions	_	—

As of March 31, 2009, the Bank has not been an originator for securitization exposure, having effects of credit risk mitigation.

### Details of Securitization Exposure Held as Investor by Exposure Type

	As of Mar	ch 31, 2009	As of March 31, 2008	
Classification	Amount of exposure	Deductions from capital	Amount of exposure	Deductions from capital
Total amount of securitization exposure	6,170	79	6,040	23
Individuals				
Asset-Backed Securities (ABS)	2,649	18	1,841	
Residential Mortgage-Backed Securities (RMBS)	652	1	847	1
Real estate				
Commercial Mortgage-Backed Securities (CMBS)	602	1	749	
Corporates				
Subtotal of CDOs (CLO, ABS-CDO, CBO)	2,194	40	2,515	0
Collateralized Loan Obligations (CLO)	1,908	30	1,997	
Asset-Backed Securities CDOs (ABS-CDO)	217	9	412	0
Collateralized Bond Obligations (CBO)	69	_	105	_
Others	70	18	86	21

Note: "Deduction from capital" is equity exposure deducted from capital under Article 224 of the Notification Regarding Capital Adequacy.

## Amount of Securitization Exposure Held as Investor and Regulatory Required Capital by Risk-Weighted Category

Regulatory Required Capital by Ris		ategory		(Billions of ye		
	As of Marc	ch 31, 2009	As of Marc	As of March 31, 2008		
Classification	Amount of exposure	Regulatory Required Capital	Amount of exposure	Regulatory Required Capital		
Amount of securitization exposure	6,170	193	6,040	112		
Risk weight: 20% or less	5,418	43	5,441	48		
Risk weight: exceeding 20% to 50% or less	290	8	247	6		
Risk weight: exceeding 50% to 100% or less	197	13	266	18		
Risk weight: exceeding 100% to 250% or less	128	22	48	9		
Risk weight: exceeding 250% to less than 1,250%	55	26	13	6		
Deductions from capital	79	79	23	23		

# **Risk-Weighted Assets Computed through Application of**

### Appendix Article 15 of the Notification Regarding Capital Adequacy

Not applicable

# 7. Market Risk (Non-Consolidated)

### Computation of the Market Risk Amount Using the Internal Models Approach ■ VaR

		(Millions of yen)
	Fiscal 2008	Fiscal 2007
Base date of computation	2009. 3. 31	2008. 3. 31
VaR (For the most recent 60 business days)		
Base date of computation	333	170
Maximum	531	532
Minimum	138	137
Average	258	252

### Amounts of Market Risk

			(Millions of ye
		Fiscal 2008	Fiscal 2007
For the portion computed with the internal models approach (B)+(E)	(A)	776	859
Value at Risk (MAX (C, D))	(B)	776	859
Amount on base date of computation	(C)	333	170
Amount determined by multiplying (F) by the average for the most recent 60 business days	(D)	776	859
Additional amount at the time of measuring individual risk	(E)	0	0
(Multiplier)	(F)	3.0	3.4
(Times exceeding VaR in back testing)	(G)	2	5

# 8. Items for Equity Exposure (Non-Consolidated)

(Includes items such as shares, excludes items in a trading account)

### Amounts on the Balance Sheet and Market Value

Amounts on the balance Sheet and		7		(Billions of yen)
	As of March 31, 2009		As of March 31, 2008	
Classification	Amounts on the balance sheet Market value		Amounts on the balance sheet	Market value
Equity exposure	520	520	866	866
Exposure to publicly traded equity	331	331	650	650
Exposure to privately held equity	188	188	215	215

Notes: 1. No stocks included in this table are fund-raising instruments of other financial institutions that the Bank holds deliberately as specified in the Notification Regarding Capital Adequacy, Article 20-1-1.

2. Regarding "market value," equities with quoted market values are evaluated at market, and those without market values are valued using the total amounts entered in the balance sheet.

(Billions of ven)

### Amount of Gain (Loss) due to Sale or Write-Off

	Fiscal 2008			Fiscal 2007		
Item	Gains from sale	Losses from sales	Write-offs of	Gains from sale	Losses from sales	Write-offs of
	of equities, etc.	of equities, etc.	equities, etc.	of equities, etc.	of equities, etc.	equities, etc.
Equity exposure	37	79	30	53	0	72

Note: Amounts reflect relevant figures posted in the income statements.

### **Amount of Valuation Gains (Losses)**

		(Billions of yen)
Item	As of March 31, 2009	As of March 31, 2008
Amount of valuation gain (loss) recognized on the balance sheet and not recognized in the statements of operations	9	170

Notes: 1. Exposure is to equity shares issued by both domestic and overseas companies.

2. No stocks included in this table are fund-raising instruments of other financial institutions that the Bank holds deliberately, as specified in the Notification Regarding Capital Adequacy, Article 20-1-1.

# Unrealized Gains (Losses) Not Recognized on Non-Consolidated Balance Sheets or Non-Consolidated Statements of Income

Not applicable

## Amount Included in Supplementary Capital (Tier II) Under Stipulations of the Notification Regarding Capital Adequacy, Article 18-1-1

		(Billions of yell)
Item	As of March 31, 2009	As of March 31, 2008
Amount included in supplementary capital under the stipulations of the		
Notification Regarding Capital Adequacy, Article 18-1-1	_	

Note: "Amount included in supplementary capital under the stipulations of the Notification Regarding Capital Adequacy, Article 18-1-1" is 45% of the total value of exposure to equity and other investments (excluding equities, etc., that are fund-raising instruments of other financial institutions that the Bank holds deliberately, as specified in the Notification Regarding Capital Adequacy, Article 20-1-1) classified under other securities at market value, minus the total book value of these securities.

### Equity Exposure Subject to Treatment Under the Notification Regarding Capital Adequacy, Appendix Article 13

Regarding Capital Adequacy, Appendix Article 13		(Billions of yen)
	As of March 31, 2009	As of March 31, 2008
Classification	Amounts on the balance sheets	Amounts on the balance sheets
Equity exposure subject to treatment under the Notification Regarding Capital Adequacy, Appendix Article 13	347	518
Corporate	314	483
Bank	26	29
Sovereign	5	5

Note: Appendix Article 13 of the Notification Regarding Capital Adequacy specifies provisional methods for calculating the value of credit risk assets in exposure to equity and other investments that meets certain specified standards.

# 9. Exposure Subject to Risk-Weighted Asset Calculation for Investment Fund (Non-Consolidated)

Investment Fund				(Billions of yer	
Classification	As of Ma	As of March 31, 2009		As of March 31, 2008	
	Exposure	(For reference) Weighted-average risk weight	Exposure	(For reference) Weighted-average risk weight	
Look-through approach	13,071	69%	17,607	64%	
Majority approach	541	337%	861	365%	
Mandate approach	_	_		_	
Market-based approach	1,258	235%	2,873	184%	
Others (simple approach)	274	448%	381	458%	
Total	15,146	98%	21,724	93%	

### Amount of Exposure Subject to Risk-Weighted Asset Calculation for Investment Fund

Notes: 1. The "Look-through approach" is a method for computing the risk-weighted assets in fund by totaling the amount of risk-weighted assets for credit risk in individual asset categories. (Please refer to Notification Regarding Capital Adequacy, Article 144-1.)

2. The "Majority approach" is a method for computing the risk-weighted assets in fund by applying risk weight to the fund as well as equity exposure when the exposure of equity, in terms of value, is major in a fund. (Please refer to the Notification Regarding Capital Adequacy, Article 144-2.)

3. The "Mandate approach" is a method for computing the risk-weighted assets in fund where only the investment mandate of the fund is known. The risk-weighted assets are computed as follows; It is assumed that the fund first invests, to the maximum extent allowed under its mandate, in the asset classes attracting the highest capital requirement, and then continues making investments in descending order until the maximum total investment level is reached. (Please refer to the Notification Regarding Capital Adequacy, Article 144-3.)

4. The "Market-based approach" is a method for computing the credit risk of exposure regarded as credit risk assets using the Bank's internal model (which is a value-at-risk (VaR) model based on the historical simulation method). (Please refer to the Notification Regarding Capital Adequacy, Article 144-4.)

5. The "Others (simple approach)" is a method for computing the risk-weighted assets in fund by applying risk weight of 400%, when it is judged the probability that the weighted-average risk weight will be less than 400%. In all other cases, risk weight of 1,250% is applied to funds. (Please refer to the Notification Regarding Capital Adequacy, Article 144-5.)

6. (For reference) Weighted-average risk weight = {Total risk-weighted assets + (Expected losses + Deductions from capital) / 8%} / EAD

# 10. Interest-Rate Risk (Non-Consolidated)

(Interest-rate risk (excluding trading account) is the gain or loss from interest-rate shocks or the increase or decrease in economic value used for internal management purposes.)

## Interest-Rate Risk Volume Computed with the Internal Model

### in Core Business Accounts (The Banking Accounts)

In core business Accounts (The banking Accounts)		(Billions of yen)
Classification	As of March 31, 2009	As of March 31, 2008
Interest-rate risk	1,125	1,290
Yen interest-rate risk	6	(62)
U.S. dollar interest-rate risk	1,014	1,214
Euro interest-rate risk	97	114
Interest-rate risk in other currencies	6	23

Note: Regarding core deposits, since the balances of deposits, etc., without maturity dates are limited, the Bank does not currently measure their risk volume. In addition, regarding repayments of mortgage-backed securities and callable securities before maturity, risk volume is measured after taking account of negative convexity and option vega due to call conditions and other factors.