THE CENTRAL BANK OF THE BAHAMAS

Consultation Paper on Minimum Disclosure Requirements

Bank Supervision Department Publication Date: December 12, 2014 Closing date for Comments: February 12, 2015

INTRODUCTION

On June 26, 2004, the Basel Committee on Banking Supervision ('BCBS') released a document called *International Convergence of Capital Measurement and Capital Standards: A Revised Framework*, also known as Basel II (finalised in June 2006). The guiding principle of Pillar 3 is market disciple which is to complement the minimum capital requirement (Pillar 1) and the supervisory review process (Pillar 2).

PURPOSE

Pillar 3 disclosures of the Basel II framework encourages market discipline by developing a set of disclosure requirements, which allow market participants to assess key pieces of information on the scope of application, capital, risk exposures, risk assessment processes, and hence the capital adequacy of the institution. The purpose of this paper is to present the Central Bank's minimum disclosure framework in line with Pillar 3 requirements. In this regard, we invite comments and/or questions from our various industry stakeholders.

Consultative Period

To make an informed and impartial decision on this topic, the Central Bank wishes to obtain comments from its licensees and other interested parties. The consultative period will run for sixty (60) days, from 12th December, 2014 to end on 12th February, 2015. In that regard, we welcome your comments on these proposals.

Questions and/or Comments

You are encouraged to submit questions and/or comments relative to this consultation paper to the Policy Unit, Bank Supervision Department, via postal mail or email.

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Minimum Disclosure Guideline

1. OVERVIEW

- 1.1. Market discipline is the term that describes the monitoring and control of an institution's management by outside stakeholders to ensure that it acts in their best interests. By monitoring the activities of the institution and responding accordingly, stakeholders influence the behaviour of the institution and discourage it from taking actions damaging to their interests. If this is to work effectively, the market must receive frequent, relevant, and meaningful information about an institution's risk management strategies and operations. Enhanced disclosure is therefore an important part of the Basel II: International Convergence of Capital Measurement and Capital Standards: A Revised Framework ("the Basel II framework"), which can be accessed via the Bank for International Settlement (BIS) website.
- 1.2. The purpose of the Pillar 3 disclosures of the Basel II framework is to encourage market discipline by developing a set of disclosure requirements which allow market participants to assess key pieces of information on the scope of application, capital, risk exposures, risk assessment processes, and hence the capital adequacy of the institution. The disclosures on remuneration will support effective market discipline and will allow market participants to assess the quality of the compensation practices and the quality of support for a firm's strategy and risk posture. The enhanced transparency is intended to strengthen market discipline by providing a common, consistent framework for assessing and comparing the underlying risks to which banks are exposed.
- 1.3. Therefore, these Guidelines, which are fully consonant with the Basel II framework, is intended to encourage licensees to capitalise on modern risk management techniques, and to establish a more risk responsive linkage between their operations and capital requirements.

2 APPLICABILITY

2.1. These Guidelines apply, as appropriate, to all public licensees of the Central Bank subject to Basel II reporting. However, where licensees are part of international financial groups, the disclosure requirements set out in these Guidelines apply at the top consolidated level. Nevertheless, the Central Bank will still have the discretion to require additional disclosures at a sub-consolidated level, especially in the case of licensees, which are a part of international financial groups that are already subject to similar disclosure requirements at the top consolidated level. The minimum disclosure requirements are set out in Appendix 1.

- 2.2. As a general point, the disclosure requirements reflect the nature, size and complexity of an institution. Accordingly, smaller and or less complex licensees will only be required to disclose certain relevant parts of Pillar 3 requirements. Licensees should refer to the Central Bank where they are uncertain about how Pillar 3 applies to them.
- 2.3. These Guidelines are intended only to supplement, and not to replace, other disclosure requirements under relevant legislation or accounting and financial reporting standards. Where relevant, a licensee should comply with such other disclosure requirements under the Companies Act (Chapter 308), the Listing Rules of The Bahamas International Securities Exchange (BISX), and International Financial Reporting Standards (IFRS), as applicable. As well, these Guidelines do not address publication requirements outlined in Section 8 of the BTCRA.
- 2.4. As the disclosures required under these Guidelines are the minimum requirements, licensees are encouraged to develop a level of disclosure that exceeds these minimum requirements and to make more extensive voluntary disclosures, where it is practical for them to do so. Licensees should stand ready to justify any decision not to disclose in line with these Guidelines, whether on materiality or other grounds. It is recommended that disclosures be shared with the Central Bank prior to the information being published.
- 2.5. These Guidelines are to be read in conjunction with the following guidelines and guidance notes that relate to issues concerning publication requirements, external auditors and accounting and other records:
 - a. Guidance Notice on Annual Publication of Audited Financial Statements;
 - b. Guidelines on the Relationship between External Auditors of Licensees and the Central Bank; and
 - c. Guidance Note on Accounting and Other Records and Internal Control Systems and Reporting Accountants' Reports Thereon.

3. DISCLOSURE POLICY

- 3.1. Licensees should have in place a formal disclosure policy approved by the Board of Directors ("the Board"), which sets out the licensee's approach for determining which disclosures it will make, and the internal controls over the disclosure process.
- 3.2. The extent that any of the disclosures required by these Guidelines are substantially similar to those required to satisfy accounting standards or securities regulations, licensees may rely on such disclosures to satisfy the Pillar 3 disclosures.

4. STATEMENT OF COMPLIANCE

- 4.1 Licensees should include a statement by the Board on the extent of compliance with the disclosure requirements set out in these Guidelines and the reason for any non-compliance in their annual audited financial statements or as part of the accompanying information to their financial statements (i.e. the Management's Discussion and Analysis (MD&A)).
- 4.2 In cases of full compliance, a general statement that the annual audited financial statements comply fully with the minimum disclosure requirements set out in these Guidelines should be made.
- 4.3 In case of partial compliance, the statement in the annual audited financial statements should specify the areas of, and reasons for, non-compliance. The statement should also quantify the financial effect of compliance with the guidelines, compared with non-compliance, if any, in the financial statements.

5. MEDIUM AND LOCATION OF DISCLOSURES

- 5.1. A licensee may elect to publish its Pillar 3 disclosures in the Official Gazette, financial statements or on its website ("medium of publication"). Where a licensee elects to publish in the Official Gazette, it must provide the Central Bank with a copy of the "tear sheet" as evidence of publication. Where a licensee elects to publish in its financial statement, it must provide a copy of its financial statements to the Central Bank. Where a licensee elects to publish on its website, it must provide the Central Bank with the webpage address of the publication, along with a printed copy of the webpage, as evidence of publication.
- 5.2. A licensee must inform the Bank in writing at least one (1) month before the date of publication of its chosen medium of publication. This will become the default medium of publication of the licensee, unless the licensee has requested and received the Bank's prior approval to change its medium of publication. The licensee must specify the reason(s) for the change, when seeking the Bank's approval to change its default medium of publication.

6. VALIDATION OF DISCLOSURES

6.1. Pillar 3 disclosures are not required to be audited by an external auditor, unless otherwise required by accounting standard setters, securities regulators and by other authorities. The methodology used should be in keeping with the rules used for its audited disclosures. Nevertheless, it will remain the responsibility of the licensee to ensure that the required prudential disclosures are appropriately verified for their reliability and consistency with any previously released information. In this respect, the

Central Bank requires that the Board include a statement in the Annual Corporate Governance Certificate confirming the reliability of the information disclosed.

7. FREQUENCY OF DISCLOSURES

7.1. Although the Basel II framework requires that most disclosure be made on a semi-annual basis, licensees are expected to disclose on a quarterly basis so as to align with the quarterly financial reporting required by the Central Bank. Qualitative disclosures on licensees' risk management objectives, policies, and general procedures can be disclosed on an annual basis. When a licensee publishes information on an annual basis, it should include sufficient information to support this frequency of disclosure. Also licensees' disclosure on remuneration should be published on an annual basis.

8. MATERIALITY OF DISCLOSURES

8.1. All licensees should disclose information that is relevant and is deemed to be material. Information is considered material if its omission or misstatement may influence the user in their assessment or decision on the information for the purpose of making economic decisions.

9. PROPRIETARY AND CONFIDENTIAL INFORMATION

9.1. The Central Bank believes that the requirements contained in these Guidelines strike an appropriate balance between the need for public disclosure and protection of proprietary and confidential information. Therefore, it is not the intention of the Central Bank to require its licensees to publicly disclose any information that might place them at a competitive disadvantage or to disclose proprietary or confidential customer information. Where a licensee believes that the release of certain prudential information might adversely affect it, management should discuss their concerns with the Central Bank, with a view to determining whether an alternative disclosure of more general information may be possible. In any such case, the licensee should disclose the omission to the Central Bank and seek its approval for doing so; in general, these matters will be addressed on a case by case basis.

10. REMUNERATION

- 10.1. Licensees should disclose clear, comprehensive and timely information about their compensation practices to facilitate constructive engagement by all stakeholders. The remuneration disclosures requirements are set out in **Appendix 2.** The disclosures will cover the following information:
 - the governance and committee structure;
 - o the design operation of remuneration structure and frequency of review;
 - o the independence of remuneration for risk/compliance staff;
 - the risk adjustment methodologies;
 - o the link between remuneration and performance; and

- o the amount of remuneration awards for the financial year.
- 10.2. Certain types of disclosure may be exempted on grounds that the information is not material, or is proprietary or confidential. Management should discuss their concerns with the Central Bank, with a view to determining whether an alternative disclosure of more general information may be possible. Any omission will require the approval of the Central Bank.

11. FINANCIAL STATEMENT DISCLOSURES

11.1 These guidelines outline the financial disclosures that the Central Bank expects licensees to provide in or with their annual financial statements or annual reports in addition to, or in conjunction with, all of the disclosure required by *International Financial Reporting Standards (IFRSs)*, Basel II Pillar 3 or other accounting standards accepted by the Central Bank. Licensees should disclose the information as outlined in **Appendix 2** as part of the information to their Financial Statements (i.e. the MD&A) or as part of the Financial Statements themselves. Licensees are encouraged to develop a level of disclosure that exceeds the minimum expectation of these guidelines and to provide information in a structure consistent with that used for management or internal reporting purposes. The financial statement disclosures are set out in Appendix 3

Qualitative Information on Risk Management

- 11.2. Licensees should identify and describe the risks that are significant to their business. These include, but are not limited to, credit risk, liquidity risk, interest rate risk in the banking book, market risk and foreign exchange rate risk. Discussion of the overall risk management philosophy, risk management strategies and practices should be provided. The licensee should describe the way in which it monitors and controls such risks. These should include:
 - o Identification and measurement of the various forms of risk;
 - Approval of transactions including the delegation of credit authority and the approval process for new products and activities;
 - Monitoring and control arrangements for risks;
 - Use of limits for controlling risks;
 - Operational controls; and
 - Role of internal audit.

Corporate Governance

11.3. Licensees should also disclose the responsibilities of the Board and senior management for risk management, including policy setting, implementation, monitoring and review. The audited financial statements should also include a comment on the licensee's compliance with Guidelines for the Corporate Governance of Banks and Trust Companies Licensed to do Business within and from within The Bahamas.

12. OTHER

Comparative figures

12.1 The corresponding amounts for the immediately preceding financial year should be given for the disclosures in section 12 of the Guidelines. Where the disclosures are applied for the first time, and it is impractical to apply the disclosures retrospectively, the disclosures in respect of the comparatives need not apply for the first year.

Terminology

12.2 Licensees should provide sufficient descriptions in their accounting policy notes or other notes on the financial statements to enable the users of the financial statement to understand how material items have been classified.

Presentation and Layout

- 12.3 The precise method of presentation in the financial accounts and their layout is a matter for individual licensees to agree with their auditors. The licensee's external auditor will determine compliance with IFRS.
- 12.4 Licensees should exercise judgement in deciding on the relative prominence given to each disclosed item, having regard to the overall clarity of the financial statements.

Appendix 1

| | | | DIS | CLOSURE PROVIDED | | | FREQI | JENCY | |
|-----------------------------|------|---|------------------|---|--------|-----------|-------------|--------------------------------|-----------------------------|
| PILLAR 3 DISCLO | SURE | REQUIREMENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | | Table 1 - Scop | e of Applic | ation | | | | | |
| Qualitative Disclosures | 1 | The name of the top corporate entity in the group to which this Framework applies. | | | | | | | |
| | 2 | An outline of differences in the basis of consolidation for accounting and regulatory purposes, with a brief description of the entities ¹ within the group | | | | | | | |
| | а | that are fully consolidated ² | | | | | | | |
| | b | that are pro-rata consolidated3 | | | | | | | |
| | С | that are given a deduction treatment; 4 and | | | | | | | |
| | d | from which surplus capital is recognized plus | | | | | | | |
| | e | that are neither consolidated nor deducted | | | | | | | |
| | 3 | Any restrictions, or other major impediments, on transfer of funds or regulatory capital within the group | | | | | | | |
| Quantitative Disclosures | 4 | The aggregate amount of surplus capital of insurance subsidiaries (whether deducted or subjected to an alternative method ⁵) included in the capital of the consolidated group. | | | | | | | |
| | 5 | The aggregate amount of capital deficiencies ⁶ in all subsidiaries not included in the consolidation i.e. that are deducted and the name(s) of such subsidiaries | | | | | | | |

| | The aggregate amounts (e.g. current book value) of | | | | |
|---|--|--|--|--|--|
| | the firm's total interests in insurance entities, which | | | | |
| | are risk-weighted rather than deducted from capital | | | | |
| | or subjected to an alternate group-wide method ⁸ , as | | | | |
| | well as their name, their country of incorporation or | | | | |
| | residence, the proportion of ownership interest and, | | | | |
| | if different, the proportion of voting power in these | | | | |
| | entities. In addition, indicate the quantitative impact | | | | |
| | on regulatory capital of using this method versus | | | | |
| 6 | using the deduction or alternate group-wide method. | | | | |

^{**} Provide details (e.g., financial statements, MD&A, website) and page reference where applicable.

¹ Entity = securities, insurance and other financial subsidiaries, commercial subsidiaries, significant minority equity investments in insurance, financial and commercial entities.

² Following the listing of significant subsidiaries in consolidated accounting, e.g. accounting for consolidated and separate financial statements/subsidiaries ³ Following the listing of subsidiaries in consolidated accounting, e.g. accounting for investments/interests in joint ventures.

⁴ May be provided as an extension (extension of entities only if they are significant for the consolidating bank) to the listing of significant subsidiaries in consolidated accounting, e.g. accounting for consolidated and separate financial statements/ and accounting for investments/interests in joint ventures.
⁵ See paragraphs 30 and 33.

⁶ A capital deficiency is the amount by which actual capital is less than the regulatory capital requirement. Any deficiencies which have been deducted on a group level in addition to the investment in such subsidiaries are not to be included in the aggregate capital deficiency.

⁷ See paragraph 31

⁸ See paragraph 30

| | | | DISCL | OSURE PROVIDED | | | Location of | | |
|-----------------------------|------|---|------------------|---|--------|-----------|-------------|-----------------------------|--------------|
| PILLAR 3 DISCLO | SURE | REQUIREMENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Disclosure** |
| | | | | ructure Basel II | | | | | |
| Qualitative Disclosures | 1 | Summary information on the terms and conditions of the main features of all capital instruments, especially in the case of innovative, complex or hybrid capital instruments. | | | | | | | |
| Quantitative Disclosures | 2 | The amount of Tier 1 capital, with separate disclosure of: | | | | | | | |
| | • | paid-up share capital/common stock; | | | | | | | |
| | • | reserves; | | | | | | | |
| | • | minority interests in the equity of subsidiaries; | | | | | | | |
| | • | innovative instruments; ⁹ | | | | | | | |
| | • | other capital instruments; | | | | | | | |
| | • | surplus capital from insurance companies; ¹⁰ | | | | | | | |
| | • | regulatory calculation differences deducted from Tier 1 capital; and | | | | | | | |
| | • | other amounts deducted from Tier 1 capital, including goodwill and investments | | | | | | | |
| | 3 | The total amount of Tier 2 and Tier 3 capital | | | | | | | |
| | 4 | Other deductions from capital. | | | | | | | |
| | 5 | Total eligible capital | | | | | | n 4 conital (07 (| |

⁹ Innovative instruments are covered under the Committee's press release, Instruments eligible for inclusion in Tier 1 capital (27 October 1998).

10 See paragraph 33.

| | | Table 2 (a) - | - Capital S | tructure Basel III | | | |
|-----------------------------|---|---|-------------|--------------------|--|--|--|
| Qualitative Disclosures | 1 | Summary information on the terms and conditions of the main features of all capital instruments, especially in the case of innovative, complex or hybrid capital instruments. | | | | | |
| Quantitative Disclosures | 2 | The amount of Common Equity Tier 1 capital, with separate disclosure of: | | | | | |
| | • | Common shares issued by the bank that meet the criteria for classification as common shares for regulatory purposes (or the equivalent for non-joint stock companies); | | | | | |
| | • | Stock surplus (share premium) resulting from the issue of instruments included Common Equity Tier 1; | | | | | |
| | • | Retained earnings; | | | | | |
| | • | Accumulated other comprehensive income and other disclosed reserves; ¹⁰ | | | | | |

| | PILLAR 3 DISCLOSURE REQUIREMENTS Common shares issued by consolidated subsidiaries of the bank and held by third parties (i.e. minority interest) that meet the criteria for | | DISCLOSURE PROVIDED | | | FREQUENCY | | | | | |
|------------|---|--|--|--------|-----------|-------------|-----------------------------|-----------------------------|--|--|--|
| PILLAR 3 [| | | If No or N/A, indicate reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** | | | |
| | , | | | | | | | | | | |

| • | Regulatory adjustments applied in the calculation of Common Equity Tier 1 | | | | |
|---|--|--|--|--|--|
| • | Total Common Equity Tier 1 | | | | |
| 3 | | | | | |
| | (and are not included in common Equity net 2)) | | | | |
| | Stock surplus (share premium) resulting from the issue of instruments included in Additional Tier 1 capital; | | | | |
| | Instruments issued by consolidated subsidiaries of the bank and held by third parties that meet the criteria for inclusion in Additional Tier 1 capital and are not included in Common Equity Tier 1. See section 4 for the relevant criteria; and | | | | |
| • | Regulatory adjustments applied in the calculation of Additional Tier 1 Capital | | | | |
| • | Total Additional Tier 1 | | | | |
| 4 | Tier 2 capital consists of the sum of the following elements | | | | |
| | Instruments issued by the bank that meet the criteria for inclusion in Tier 2 capital (and are not included in Tier 1 capital); | | | | |
| | Stock surplus (share premium) resulting from the issue of instruments included in Tier 2 capital; | | | | |
| | Instruments issued by consolidated subsidiaries of the bank and held by third parties that meet the criteria for inclusion in Tier 2 capital and are not included in Tier 1 capital. See section 4 for the relevant criteria; | | | | |
| • | Certain loan loss provisions as specified in paragraphs 60 and 61; and | | | | |

| | • | Regulatory adjustments applied in the calculation of Tier 2 Capital. | | | | |
|--|---|--|--|--|--|--|
| | • | Total Tier 2 | | | | |
| | 5 | Total regulatory capital | | | | |

| | | | DISCL | OSURE PROVIDED | | | FREQU | JENCY | |
|-----------------------------|------|---|------------------|---|--------|-----------|-------------|-----------------------------|-----------------------------|
| PILLAR 3 DISCI | LOSI | JRE REQUIREMENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | | Tab | le 3 - Capita | al Adequacy | | | | | |
| Qualitative Disclosures | 1 | A summary discussion of the bank's approach to assessing the adequacy of its capital to support current and future activities. | · | | | | | | |
| Quantitative Disclosures | 2 | Capital requirements for credit risk: Portfolios subject to standardized, disclosed separately for each portfolio; | | | | | | | |
| | | Corporate (including SL not subject to supervisory slotting criteria), sovereign and bank; | | | | | | | |
| | | Residential mortgage; Qualifying revolving retail;¹¹ and Other retail; | | | | | | | |
| | • | Securitization exposures | | | | | | | |
| | 3 | Capital requirements for market risk: • Standardized approach; | | | | | | | |
| | 4 | Capital requirements for operational risk: • Standardized approach; | | | | | | | |
| | 5 | Total and Tier 1 ¹² capital ratio | | | | | | | |
| 11 Davidson bound | • | For the top consolidated group; and For significant bank subsidiaries (stand alone or sub-consolidated depending on how the Framework is applied). | | | | | | | |

Banks should distinguish between the separate non-mortgage retail portfolios used for the Pillar 1 capital calculation (i.e. qualifying revolving retail exposures and other retail exposures) unless these portfolios are insignificant in size (relative to overall credit exposures) and the risk profile of each portfolio is sufficiently similar such that separate disclosure would not help users' understanding of the risk profile of the banks' retail business.

12 Including proportion of innovative capital instruments.

| | | Table 4 ¹³ - Credit R | tisk: genera | ıl disclosures for all b | anks | | |
|-------------|---|---|--------------|--------------------------|------|--|--|
| Qualitative | | The general qualitative disclosure | | | | | |
| Disclosures | | requirements (paragraph 824) with respect | | | | | |
| | 1 | to credit risk, including: | | | | | |
| | | Definitions of past due and impaired (for | | | | | |
| | • | regulatory accounting purposes); | | | | | |
| | | Description of approaches followed for | | | | | |
| | | specific and general allowances and | | | | | |
| | • | statistical methods; | | | | | |
| | | Discussion of the bank's credit risk | | | | | |
| | • | management policy; and | | | | | |
| | | A description of the nature of exposures | | | | | |
| | | within each portfolio that are subject to the | | | | | |
| | | standardized approach, description of any | | | | | |
| | | plans for moving to advanced methodologies | | | | | |
| | | to be taken to migration of existing | | | | | |
| | | exposures and timing for migrating | | | | | |
| 13 – | • | exposures | | | | | |

¹³ Table 4 does not include equities.

| | | | DIS | CLOSURE PROVIDED | | | FREQU | JENCY | |
|----------------------------|------|--|------------------|---|--------|-----------|-------------|-----------------------------|-----------------------------|
| PILLAR 3 DISC | LOSI | JRE REQUIREMENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| Qualitative Disclosures | 1 | Total gross credit risk exposures, plus average gross exposure over the period broken down by major types of credit exposure ¹⁴ | | | | | | | |
| | 2 | Geographic distribution of exposures, broken down in significant areas by major types of credit exposure | | | | | | | |
| | 3 | Industry or counterparty type distribution of exposures, broken down by major types of credit exposure | | | | | | | |
| | 4 | Residual contractual maturity breakdown of the whole portfolio, broken down by major types of credit exposure | | | | | | | |
| | 5 | By major industry or counterparty type: Amount of impaired loans and if available, past due | | | | | | | |
| | • | loans, provided separately ¹⁵ Specific and general allowances; and | | | | | | | |
| | • | Charges for specific allowances and charge-offs during the period. | | | | | | | |
| | | Amount of impaired loans and, if available, past due loans provided separately broken down by significant geographic areas including, if practical, the amounts of specific and general allowances | | | | | | | |
| | 6 | related to each geographical area. Reconciliation of changes in the allowances for | | | | | | | |
| | 7 | loan impairment. For each portfolio, the amount of exposures | | | | | | | |
| | 8 | subject to the standardized approach | | | | | | | |

This breakdown could be that applied under accounting rules, and might, for instance, be (a) loans, commitments and other non-derivative off balance sheet exposures, (b) debt securities, and (c) OTC derivatives.

Banks are encouraged also to provide analysis of the ageing of past-due loans.

| | | | DISCLOSURE PROVIDED | | | | | | |
|-----------------|--------------------------------|---|---------------------|--|--------|-----------|-------------|------------------------------|-----------------------------|
| PILLAR 3 DISCLO | LLAR 3 DISCLOSURE REQUIREMENTS | | | If No or N/A, indicate reason disclosure not provided | Annual | Quarterly | Semi Annual | If other, provide details | Location of Disclosure** |
| | | Table 5 - Credit Risk: disclosures | for portfoli | os subject to the standa | rdized | appro | ach | | |
| Qualitative | | For portfolios under the standardized | | | | | | | |
| Disclosures | 1 | approach | | | | | | | |
| | | Names of ECAIs and ECAs used, plus reasons | | | | | | | |
| | • | for any changes | | | | | | | |
| | • | Types of exposure for which each agency is used | | | | | | | |
| | | A description of the process used to transfer | | | | | | | |
| | | public issue ratings onto comparable assets | | | | | | | |
| | • | in the banking book; and | | | | | | | |
| | | The alignment of the alphanumerical scale of | | | | | | | |
| | • | each agency used with risk buckets ¹⁶ | | | | | | | |
| | | For exposure amounts after risk mitigation | | | | | | | |
| | | subject to the standardized approach, amount of a bank's outstanding (rated and | | | | | | | |
| | | unrated) in each risk bucket as well as those | | | | | | | |
| | 2 | that are deducted. | | | | | | | |

¹⁶ This information need not be disclosed if the bank complies with a standard mapping which is published by the relevant supervisor.

| | | Table 6 - Credit Risk Mitigat | ion: disclos | ures for standard | lized approac | h ^{17,18} | | |
|-----------------------------|---|---|--------------|-------------------|---------------|--------------------|--|--|
| Qualitative Disclosures | 1 | The general qualitative disclosure requirement (paragraph 824) with respect to credit risk mitigation including: | | | | | | |
| | • | policies and processes for, and an indication of the extent to which the bank makes use of, on and off-balance sheet netting; | | | | | | |
| | • | policies and processes for collateral valuation and management; | | | | | | |
| | • | a description of the main types of collateral taken by the bank; | | | | | | |
| | • | the main types of guarantor/credit derivative counterparty and their creditworthiness; and information about (market or credit) risk | | | | | | |
| | • | concentrations within the mitigation taken. | | | | | | |
| Quantitative Disclosures | 2 | For each separately disclosed credit risk portfolio under the standardized, the total exposure (after, where applicable, on- or off-balance sheet netting) that is covered by eligible financial collateral after the application of haircuts. 19 | | | | | | |
| | 3 | For each separately disclosed portfolio under the standardized approach, the total exposure (after, where applicable, on- or off-balance sheet netting) that is covered by guarantees/credit derivatives. | | | | | | |

At a minimum, banks must give the disclosures below in relation to credit risk mitigation that has been recognized for the purposes of reducing capital requirements under this Framework. Where relevant, banks are encouraged to give further information about mitigants that have not been recognized for that purpose.

Credit derivatives that are treated, for the purposes of this Framework, as part of synthetic securitization structures should be excluded from the credit risk mitigation disclosures and included within those relating to securitization.

¹⁹ If the comprehensive approach is applied, where applicable, the total exposure covered by collateral after haircuts should be reduced further to remove any positive adjustments that were applied to the exposure, as permitted under Part 2.

| | | | DISCL | OSURE PROVIDED | | | FREQU | JENCY | |
|-----------------|----------------------------------|--|-----------|--|-----------|-----------|-------------|------------------------------|-----------------------------|
| PILLAR 3 DISCLO | PILLAR 3 DISCLOSURE REQUIREMENTS | | | If No or N/A, indicate reason disclosure not provided | Annual | Quarterly | Semi Annual | If other, provide details | Location of Disclosure** |
| | | Table 7. Comment disalessment for | | | هاله میرم | nials (C | cn) | | |
| Qualitative | | Table 7 - General disclosures for | exposures | related to counterparty | credit | risk (C | CR) | | |
| Disclosures | | The general qualitative disclosure | | | | | | | |
| | 1 | requirement (paragraphs 824 and 825) with respect to derivatives and CCR, including: | | | | | | | |
| | | Discussion of methodology used to assign | | | | | | | |
| | | economic capital and credit limits for | | | | | | | |
| | • | counterparty credit exposures; | | | | | | | |
| | • | Discussion of policies for securing collateral and establishing credit reserves; | | | | | | | |
| | | Discussion of policies with respect to wrong | | | | | | | |
| | • | way risk exposures; | | | | | | | |
| | | Discussion of the impact of the amount of collateral the bank would have to have to | | | | | | | |
| | • | provide given a credit rating downgrade. | | | | | | | |
| Quantitative | | Gross positive fair value of contracts, netting | | | | | | | |
| Disclosures | | benefits, netted current credit exposure, | | | | | | | |
| | | collateral held (including type, e.g. cash, government securities, etc.), and net | | | | | | | |
| | | derivatives credit exposure. ²⁰ Also report | | | | | | | |
| | | measures for exposure at default, or | | | | | | | |
| | | exposure amount, under the SM method. | | | | | | | |
| | | The notional value of credit derivative | | | | | | | |
| | | hedges, and the distribution of current credit | | | | | | | |
| | 2 | exposure by types of credit exposure. ²¹ | | | | | | | |

| | | Credit derivative transactions that create | | | | |
|--|---|--|--|---|--|--|
| | | exposures to CCR (notional value), | | | | |
| | | segregated between use for the institution's | | | | |
| | | own credit portfolio, as well as in its | | | | |
| | | intermediation activities, including the | | | | |
| | | distribution of the credit derivatives | | | | |
| | | products used ²² , broken down further by | | | | |
| | | protection bought and sold within each | | | | |
| | 3 | product group | | | | |
| | | The estimate of alpha if the bank has | | Ī | | |
| | | received supervisory approval to estimate | | | | |
| | 4 | alpha. | | | | |

Net credit exposure is the credit exposure on derivatives transactions after considering both the benefits from legally enforceable netting agreements and collateral arrangements. The notional amount of credit derivative hedges alerts market participants to an additional source of credit risk mitigation.

This might be interest rate contracts, FX contracts, equity contracts, credit derivatives, and commodity/other contracts.

This might be Credit Default Swaps, Total Return Swaps, Credit options, and other.

| | | Table 8 - Securitization: disclosure for the standardized approach | |
|-------------|---|--|--|
| Qualitative | | The general qualitative disclosure | |
| Disclosures | | requirement (paragraph 824) with respect to | |
| | | securitization (including synthetics), | |
| | 1 | including a discussion of: | |
| | | the bank's objectives in relation to | |
| | | securitization activity, including the extent to | |
| | | which these activities transfer credit risk of | |
| | | the underlying securitized exposures away | |
| | • | from the bank to other entities; | |
| | | the roles played by the bank in the | |
| | | securitization process ²³ and an indication of | |
| | | the extent of the bank's involvement in each | |
| | • | of them; and | |
| | | the regulatory capital approach that the | |
| | • | bank follows for its securitization activities. | |

| | | | DISCL | OSURE PROVIDED | | | | | |
|-----------------------------|----------------------------------|--|------------------|--|--------|-----------|-------------|-----------------------------|-----------------------------|
| PILLAR 3 DISCLO | PILLAR 3 DISCLOSURE REQUIREMENTS | | Yes No N/A | If No or N/A, indicate reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | 2 | Summary of the bank's accounting policies for securitization activities, including: | | | | | | | |
| | • | whether the transactions are treated as sales or financings; | | | | | | | |
| | • | Where securities are unlisted do you disclose the method of valuation? | | | | | | | |
| | • | recognition of gain on sale; | | | | | | | |
| | | key assumptions for valuing retained interests, including any significant changes since the last reporting period and the | | | | | | | |
| | • | impact of such changes; and treatment of synthetic securitizations if this is not covered by other accounting policies (e.g. on derivatives). | | | | | | | |
| | 3 | Names of ECAIs used for securitizations and the types of securitization exposure for which each agency is used. | | | | | | | |
| Quantitative Disclosures | 4 | The total outstanding exposures securitized by the bank and subject to the securitization framework (broken down into traditional/synthetic), by exposure type. 24,25,26 | | | | | | | |

| 5 | For exposures securitized by the bank and subject to the securitization framework: amount of impaired/past due assets securitized; and | | | | |
|------|--|--|--|--|--|
| | recognized by the bank during the current period ²⁷ | | | | |
| brok | en down by exposure type | | | | |
| 6 | Aggregate amount of securitization exposures retained or purchased broken down by exposure type. | | | | |
| | Aggregate amount of securitization exposures retained or purchased broken down into a number of risk weight bands. Exposures that have been deducted entirely | | | | |
| | from Tier 1 capital, credit enhancing I/Os deducted from Total Capital, and other exposures deducted from total capital | | | | |
| 7 | should be disclosed separately by type of underlying asset. | | | | |
| 8 | For securitizations subject to the early amortization treatment, the following items by underlying asset type for securitized facilities: the aggregate drawn exposures attributed to the seller's and investors' interests; | | | | |
| | Banks using the standardized approach are also subject to disclosures (g) and (h), and should use the capital charges for the standardized approach. | | | | |
| 11 | Summary of current year's securitization activity, including the amount of exposures securitized (by exposure type), and recognized gain or loss on sale by asset type. | | | | |

| 23 | For example: originator, investor, | servicer, provider of | of credit enhancemer | nt, sponsor c | of asset backed o | commercial pape | r facility, liquidity | provider, and sv | wap provider. |
|------|--------------------------------------|-----------------------|------------------------|----------------|--------------------|---------------------|-----------------------|---------------------|----------------|
| 24 | | For | example, | credit | cards, | home | equity, | auto, | etc. |
| 25 | Securitization transactions in which | the originating ban | k does not retain any | securitizatio | n exposure shou | ld be shown sepa | rately but need o | nly be reported for | or the year of |
| ince | ption. | | | | | | | | |
| 26 | Where relevant, banks are encoura | ged to differentiate | e between exposures | resulting from | m activities in wh | hich they act only | as sponsors, and | exposures that r | esult from all |
| othe | er bank securitizat | ion activit | ies that | are | subject | to | the secu | ıritization | framework. |
| 27 | For example, charge-offs/allowances | s (if the assets rema | in on the hank's halar | nce sheet) or | write-downs of I | /O strips and other | r residual interest | ts | |

| | | | DISCL | | | | | | |
|----------------------------|---|--|------------------|--|--------|-----------|-------------|------------------------------|-----------------------------|
| PILLAR 3 DISCLO | | | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other, provide details | Location of Disclosure** |
| | | Table 9 - Market Risk: disclos | sures for ha | nks using the standardiz | ed and | rnach | | | |
| Qualitative Disclosures | 1 | The general qualitative disclosure requirement (paragraph 824) for market risk including the portfolios covered by the standardized approach. | outes for ba | inks using the standardiz | eu app | Joach | | | |
| Quantitative | 2 | The capital requirements for: | | | | | | | |
| Disclosures | • | interest rate risk | | | | | | | |
| | • | equity position risk | | | | | | | |
| | • | foreign exchange risk; and | | | | | | | |
| | • | commodity risk | | | | | | | |
| | | Tab | le 10 - Oper | ational Risk | | | | | |
| Qualitative Disclosures | 1 | In addition to the general qualitative disclosure requirement (paragraph 824), the approach (es) for operational risk capital assessment for which the bank qualifies. | . С 20 Орс | | | | | | |

| | | Table 11 - Equities: d | lisclosure 1 | or banking bo | ok positions | | |
|-----------------------------|---|--|--------------|---------------|--------------|--|--|
| Qualitative Disclosures | 1 | The general qualitative disclosure requirement (paragraph 824) with respect to equity risk, including | | J | | | |
| | • | differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons; and | | | | | |
| | • | discussion of important policies covering the valuation and accounting of equity holdings in the banking book. This includes the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation as well as significant changes in these practices | | | | | |
| Quantitative Disclosures | 2 | Value disclosed in the balance sheet of investments, as well as the fair value of those investments; for quoted securities, a comparison to publicly quoted share values where the share price is materially different from fair value. | | | | | |
| | 3 | The types and nature of investments, including the amount that can be classified as | | | | | |
| | • | Publicly traded; and | | | | | |
| | • | Privately held | | | | | |
| | 4 | The cumulative realized gains (losses) arising from sales and liquidations in the reporting period. | | | | | |
| | | Total unrealized gains (losses) ²⁸ | | | | | |
| | 5 | Total latent revaluation gains (losses)²⁹ any amounts of the above included in Tier 1 and/or Tier 2 | | | | | |

| | | Capital requirements broken down by | Ī | | ĺ | | i |
|--|---|---|---|--|---|--|---|
| | | | | | | | l |
| | | appropriate equity groupings, consistent | | | | | l |
| | | with the bank's methodology, as well as the | | | | | l |
| | | aggregate amounts and the type of equity | | | | | l |
| | | investments subject to any supervisory | | | | | l |
| | | transition or grandfathering provisions | | | | | l |
| | 6 | regarding regulatory capital requirements. | | | | | l |

| | | | DISCLOSURE PROVIDED | | | | JENCY | |
|----------------------------------|--|------------------|---|----|-----------|-------------|-----------------------------|-----------------------------|
| PILLAR 3 DISCLOSURE REQUIREMENTS | | Yes No N/A | If No or N/A reason disclosure not provided | | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | Table 12 - Intere | st rate risk ir | the banking book (IRRB | В) | | | | |
| Qualitative | The general qualitative disclosur | j | | | | | | |
| Disclosures | requirement (paragraph 824 including the nature of IRRBB an key assumptions, includin | d g | | | | | | |
| | assumptions regarding loa prepayments and behavior of nor maturity deposits, and frequency o | - | | | | | | |
| | 1 IRRBB measurement. | | | | | | | |

Unrealized gains (losses) recognized in the balance sheet but not through the profit and loss account.

29 Unrealized gains (losses) not recognized either in the balance sheet or through the profit and loss account.

| | Table 13 - Corporate Governance | | | | | | | | | | | | |
|-------------|--|--|-------------|---------------|------|--|--|--|--|--|--|--|--|
| Qualitative | Do y | you disclose the following information in the audi | ited financ | cial statemer | nts? | | | | | | | | |
| Disclosures | 1 | Responsibilities of board of directors and senior management, including policy settings, implementation, monitoring and review | | | | | | | | | | | |
| | 2 | Compliance with the Corporate Governance Guidelines issued by the Central Bank | | | | | | | | | | | |
| | Table 14. Congressian and Sector Information | | | | | | | | | | | | |

Table 14 - Geographical and Sector Information

| Quantitative Disclosures | | you disclose the following information with respect to corpilities and commitments arising from or booked in countries or | | | |
|-----------------------------|---|---|--|------|--|
| | 1 | Total operating income | | | |
| | 2 | Profit or loss before taxation | | | |
| | 3 | Total assets (Investment securities, advances etc.) | | | |
| | 4 | Total Liabilities | | | |
| | 5 | Contingent liabilities and commitments | | | |
| | 6 | Do you disclose the breakdown of gross amount of advances to customers by industry sectors which are considered significant to you? | | | |
| | 7 | Do you disclose other significant concentrations? | | | |

Appendix 2

| DISCLOSURE REQUIREMENTS FOR REMUNERATION | | | DISCLO | OSURE PROVIDED | | FREQUENCY | Location of Disclosure** |
|--|---|--|------------------|--|--------|------------------------------|-----------------------------|
| | | | Yes No N/A | If No or N/A, indicate reason disclosure not provided | Annual | If other, provide details | |
| Qualitative Disclosures | b | Information relating to the bodies that oversee remuneration. Disclosures should include: Name, composition and mandate of the main body overseeing remuneration. External consultants whose advice has been sought, the body by which they were commissioned, and in what areas of the remuneration process. A description of the scope of the bank's remuneration policy (e.g. by regions, business lines), including the extent to which it is applicable to foreign subsidiaries and branches. A description of the types of employees considered as material risk takers and as senior managers, including the number of employees in each group. Information relating to the design and structure of remuneration processes. Disclosures should include: An overview of the key features and objectives of remuneration policy. Whether the remuneration committee reviewed the firm's remuneration policy during the past year, and if so, an overview of any changes that were made. A discussion of how the bank ensures that risk and | | | | | |
| | | compliance employees are remunerated independently of the businesses they oversee. | | | | | |

| d | Description of the ways in which current and future risks are taken into account in the remuneration processes. Disclosures should include: An overview of the key risks that the bank takes into account when implementing remuneration measures. An overview of the nature and type of the key measures used to take account of these risks; including risks difficult to measure (values need not be disclosed). A discussion of the ways in which these measures affect remuneration. A discussion of how the nature and type of these measures has changed over the past year and reasons for the change, as well as the impact of changes on remuneration. Description of the ways in which the bank seeks to link performance during a performance measurement period with levels of remuneration. Disclosures should include: An overview of main performance metrics for bank, top-level business lines and individuals. A discussion of how amounts of individual remuneration | | |
|---|--|--|--|
| е | are linked to bank-wide and individual performance. A discussion of the measures the bank will in general implement to adjust remuneration in the event that performance metrics are weak. Description of the ways in which the bank seek to adjust remuneration to take account of longer term performance. Disclosures should include: A discussion of the bank's policy on deferral and vesting of variable remuneration and, if the fraction of variable remuneration that is deferred differs across employees or groups of employees, a description of the factors that determine the fraction and their relative importance. A discussion of the bank's policy and criteria for adjusting deferred remuneration before vesting and (if permitted) | | |
| f | by national law) after vesting through claw back arrangements. Description of the different forms of variable remuneration that the bank utilises and the rationale for using these | | |

| Quantitativa | | different forms. Disclosures should include: An overview of the forms of variable remuneration offered (i.e. cash, shares and share-linked instruments and other forms3). A discussion of the use of the different forms of variable remuneration and, if the mix of different forms of variable remuneration differs across employees or groups of employees), a description the factors that determine the mix and their relative importance. | | | |
|-----------------------------|---|--|--|--|--|
| Quantitative Disclosures | g | Number of meetings held by the main body overseeing remuneration during the financial year and remuneration paid to its member in the capital of the consolidated group. | | | |
| | h | Number of employees having received a variable remuneration award during the financial year. Number and total amount of guaranteed bonuses awarded during the financial year. Number and total amount of sign-on awards made during the financial year. Number and total amount of severance payments made during the financial year | | | |
| | | Total amount of outstanding deferred remuneration, split into cash, shares and share-linked instruments and other forms. • Total amount of deferred remuneration paid out in the financial year. | | | |
| | j | Breakdown of amount of remuneration awards for the financial year to show: - fixed and variable deferred and non-deferred different forms used (cash, shares and share-linked instruments, other forms). Example for reporting in Table A (Annex) | | | |

² This should include the bank's criteria for determining "weak" performance metrics.

³ A description of the elements corresponding to other forms of variable remuneration (if any) should be provided.

Appendix 3

| FINANCIAL STATEMENT /ACCOUNTING DISCLOSURE REQUIREMENTS | | DISCLOSURE PROVIDED | | | | FREQ | | | |
|---|---|--|---|----------|-----------|-------------|---------------------------------|-----------------------------|--|
| | | Yes No N/A | If No or N/A, indicate reason disclosure not provided | Annual | Quarterly | Semi Annual | If other, provide details | Location of Disclosure** | |
| | | PRINCIPLE ACCOUN | ITING | POLICIES | | | | | |
| Qualitative Disclosures | 1 | Accounting Treatment/Policies with respect to: | | | | | | | |
| | | General Accounting principles | | | | | | | |
| | | Changes in Accounting Policies/Practices | | | | | | | |
| | | Principles of Consolidation | | | | | | | |
| | | Determining when assets are impaired | | | | | | | |
| | | Recognizing income & Losses on impaired assets | | | | | | | |
| | | Establishing specific and general loan loss provisions | | | | | | | |
| | | Income recognition | | | | | | | |
| | | Valuation of trading securities, investment securities, loans, tangible fixed assets, intangible fixed assets, liabilities, etc. | | | | | | | |
| | | Asset and liability recognition/de-recognition | | | | | | | |
| | | Securitizations | | | | | | | |
| | _ | Foreign currency translations | | | | | | | |

| | | Di | ISCLOSURE PROVIDED | | | FREQ | UENCY | |
|---|--|------------------|---|--------|-----------|------------------|---------------------------------|-----------------------------|
| FINANCIAL STATEMENT /ACCOUNTING DISCLOSURE REQUIREMENTS | | Yes No N/A | If No or N/A, indicate reason disclosure not provided | Annual | Quarterly | Semi Annual | If other, provide details | Location of Disclosure** |
| | Loan fees | | | | | | | |
| | Premiums and discounts | | | | | | | |
| | Repurchase and reverse repurchase agreements | | | | | | | |
| | Securities borrowing and lending | | | | | | | |
| | Property and equipment | | | | | | | |
| | Derivatives (Hedging, non-hedging, losses on derivatives) | | | | | | | |
| | Related party/affiliate transactions, inclusive of fees and expenses | | | | | | | |
| | Off-balance sheet transactions, including their measurement/valuation | | | | | | | |
| | Other activities of material nature | | | | | | | |
| | FINANCIAL STATEMENT PRESEN | TATION | I - INCOME | STA | TEN | 1EN ⁻ | Г | |
| Quantitative Disclosures | Interest Income, inclusive of income from: Cash and short term funds Trading securities Investment securities, inclusive of securities held to-maturity and available-for-sale Loans and advances Other interest income items | - | | | | | | |

| FINANCIAL STATEMENT /ACCOUNTING DISCLOSURE REQUIREMENTS | | DI | DISCLOSURE PROVIDED | | | FREQ | | |
|---|--|------------------|---|--------|-----------|-------------|---------------------------------|-----------------------------|
| | | Yes No N/A | If No or N/A, indicate reason disclosure not provided | Annual | Quarterly | Semi Annual | If other, provide details | Location of Disclosure** |
| | Interest Expense, inclusive of expenses arising from: Banks and customers Debt securities in issue Other borrowed funds Other interest expense items | | | | | | | |
| | Net Interest Income | | | | | | | |
| Quantitative Disclosures | Fee and commission income, inclusive of income from: Underwriting fees Corporate finance fees Brokerage fees Investment fund fees Fiduciary fees Custodian fees Portfolio and other management advisory fees Fee and commission expense, inclusive of expenses from: Brokerage fees paid Other | | | | | | | |
| | Net fee and commission income | | | | | | | |
| | Other Operating Income, inclusive of: Gains and losses arising from dealing in foreign currencies | | | | | | | |

| FINANCIAL STATEMENT /ACCOUNTING DISCLOSURE REQUIREMENTS | | DI | DISCLOSURE PROVIDED | | | FREQ | | |
|---|---|------------------|---|--------|-----------|-------------|---------------------------------|-----------------------------|
| | | Yes No N/A | If No or N/A, indicate reason disclosure not provided | Annual | Quarterly | Semi Annual | If other, provide details | Location of Disclosure** |
| | Gains and losses arising from other dealing activities Gains and losses arising from investment securities Gains and losses arising from dealing in foreign currencies; Gains and losses from disposal of trading securities Gains and losses arising from held-to-maturity securities Gains less losses from investments in or disposal of tangible fixed assets (property & equipment) Other operating income items Dividend income Trading securities Available-for-sale securities Other income items | | | | | | | |
| Quantitative Disclosures | Income from associates | | | | | | | |
| | Operating expenses, inclusive of: Staff costs Administrative expenses Premises and equipment expense, excluding depreciation (include software costs, operating lease rentals, etc. in the notes, where material) Depreciation charges Other operating expenses | | | | | | | |

| FINANCIAL STATEMENT /ACCOUNTING DISCLOSURE REQUIREMENTS | | DI | DISCLOSURE PROVIDED | | | FREQ | | |
|---|---|------------------|---|--------|-----------|-------------|---------------------------------|-----------------------------|
| | | Yes No N/A | If No or N/A, indicate reason disclosure not provided | Annual | Quarterly | Semi Annual | If other, provide details | Location of Disclosure** |
| | Charges for bad and doubtful debts Amounts due from other banks Loans and advances to customers Specific credit risk provisions General provisions based on overall credit analysis | | | | | | | |
| | Losses on loans and advances | | | | | | | |
| | Provisions on held-to-maturity securities, available- for-sale investment securities and trading securities | | | | | | | |
| | Taxation charges Unusual/ Infrequent income and expense items | | | | | | | |
| | Commentary about average interest rates, average interest earning assets and average interest-bearing liabilities for the period | | | | | | | |
| | The profits or losses arising from changes in the value of, or additions to or sales of investments in subsidiaries and/or associates. | | | | | | | |

| FINANCIAL S'REQUIREMEN | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | JENCY If other provide details | Location of Disclosure** | |
|----------------------------|---------------------------|---|------------|-----------|-------------|---|-----------------------------|--|
| | FINANCIAL STATEMENT PRESE | - | | VICE | СПЕ | ET | | |
| Quantitative Disclosures 3 | | NIAII | ON - BALAI | VCE | SITE | | | |

| EINANCIAL | INANCIAL STATEMENT/ACCOUNTING DISCLOSURES | | DISCLOSURE PROVIDED | | | FREQU | | |
|-----------------------------|--|------------------|---|---|--|--------------------------|--|--|
| REQUIREM | | Yes No N/A | If No or N/A reason disclosure not provided | Annual Semi Annual If other provide details | | Location of Disclosure** | | |
| | institutions Trading securities Government bonds Notes and other negotiable paper issued by central or local government Notes and other negotiable paper issued by nationalised industries Notes and other negotiable paper issued by public sector corporations and institutions (except government-owned banks) Other trading debt securities Listed Unlisted Equity securities Listed Unlisted Unlisted | | | | | | | |
| Quantitative Disclosures | Derivative financial instruments Derivatives held for trading Derivatives held for hedging | | | | | | | |
| | Loans and advances to customers originated by licensee Loans to individuals Overdrafts Credit Cards Term Loans | | | | | | | |

| EINANCIAL | FINANCIAL STATEMENT/ACCOUNTING DISCLOSURES | | DISCLOSURE PROVIDED | | | | FREQU | | |
|-----------------------------|--|--|---------------------|---|--------|-----------|-------------|--------------------------------|-----------------------------|
| REQUIREM | | | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| Quantitative Disclosures | | Residential Mortgages Loans to entities Loans to government and government agencies Direct commercial loans Sub-participation loans Other Loans purchased by licensee Sub-participation loans held-to-maturity Other purchased loans held-to-maturity Investment securities Available-for-sale Listed debt securities Unlisted equity securities Held-to-maturity Listed debt securities Unlisted equity securities Unlisted debt securities Unlisted debt securities Unlisted debt securities | | | | | | | |
| | | Investments in associates | | | | | | | |
| | | Goodwill and other intangible assets | | | | | | | |

| EINIANCIAI | FINANCIAL STATEMENT/ACCOUNTING DISCLOSURES | | DISCLOS | FREQUENCY | | | | | |
|-----------------------------|--|---|------------------|---|--------|-----------|-------------|--------------------------------|-----------------------------|
| REQUIREM | | | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | | Property, plant and equipment | | | | | | | |
| | | Deferred tax assets | | | | | | | |
| | | Other assets, inclusive of: | | | | | | | |
| Quantitative Disclosures | 4 | LIABILITIES Due to other banks Deposits from other banks Advances from other banks | | | | | | | |
| | | Other deposits Other money market deposits Certificates of deposits | | | | | | | |
| | | Due to customers Corporate customers Current/settlement accounts Term deposits | | | | | | | |

| | CTATEMENT /ACCOUNTING DISCLOSURES | DISCLOS | SURE PROVIDED | FREQUENCY | | | | |
|-----------------------------|--|------------------|---|-----------|-----------|-------------|--------------------------------|--------------------------|
| REQUIREM | STATEMENT/ACCOUNTING DISCLOSURES ENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | Retail customers Current/demand/savings accounts Term deposits | | | | | | | |
| | Derivative financial instruments & other trading liabilities | | | | | | | |
| | Issued debt securities, inclusive of: Promissory notes and other liabilities evidenced by paper (i.e. money market paper issued and bonds issued) | | | | | | | |
| | Other borrowed funds Loan capital perpetual subordinated notes Subordinated notes Redeemable preferred shares Convertible bonds | | | | | | | |
| Quantitative Disclosures | Other liabilities, inclusive of: Amounts due to creditors Interest payable Dividends payable Accruals Other provisions Other Current taxes | | | | | | | |
| | Deferred tax liabilities | | | | | | | |

| EINANCIAI | FINANCIAL STATEMENT/ACCOUNTING DISCLOSURES | | DISCLOS | | | FREQU | Location of | | |
|--------------|--|---|---|--------|-----------|-------------|--------------------------------|--------------|--|
| REQUIREMENTS | | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Disclosure** | |
| | 5 | CAPITAL RESOURCES Share capital: Amount of ordinary shares Amount of perpetual non-cumulative preference shares Share premium Less: treasury shares | | | | | | | |
| - | | Retained Earnings Hybrid capital instruments including maturity and call features Issuance of capital through special purpose vehicles (SPVs) | | | | | | | |

^{(1) -} See Roadmap "Pillar 3 Disclosure Requirements: Table 2 - Capital Structure Basel II" for full Capital Disclosures required

| | | | DISCLO | OSURE PROVIDED | | | FREQU | JENCY | |
|----------------------------|---|---|------------------|---|--------|-----------|-------------|-----------------------------|-----------------------------|
| FINANCIAL DISCI | | STATEMENT/ACCOUNTING URES REQUIREMENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | | Minority Interests | | | | | | | |
| | 6 | • Statement of Change in Shareholder's Equity | | | | | | | |
| | 7 | Cash Flow Statement Highlighting cash flows from operating, investing, and financing activities, in accordance with IFRS/ accounting principles accepted by the Central Bank. | | | | | | | |
| | | FINANCIAL STAT | EMENT P | RESENTATION - | NOT | ES | | | |
| Quantitative Disclosure | 8 | Loan Portfolio/Accounts Receivable Book (2) Provisioning: The amount of new provisions charged to the profit and loss in the period for losses on doubtful advances, receivables, etc.; As an appropriation: Transfers to or from reserves; The amount of provisions released back to the profit and loss in the period; Amounts charged for loans written off; | | | | | | | |

| | | DISCLO | SURE PROVIDED | | | | | |
|----------------------|---|------------------|---|--------|-----------|-------------|-----------------------------|-----------------------------|
| FINANCIAL DISCLOS | STATEMENT/ACCOUNTING URES REQUIREMENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | Amounts recovered of advances written off in the previous years; Interest suspended on doubtful advances etc., if applicable; Suspended interest recovered during the period, if applicable; and Exchange adjustments, if any. Material amounts set aside for provisions, other than those for depreciation, renewals or diminution in value of assets, or any material amount withdrawn from such provisions and not applied for the purposes thereof. | | | | | | | |
| | Non-performing/Impaired Assets: The criteria it uses in defining a non-performing asset (e.g. over 90 days overdue); The value of non-performing assets (advances, investments and accounts receivables); The value of suspended interest in respect of such impaired assets; The value of specific provisions made in respect to such impaired assets; and The percentage of such assets to total assets. | | | | | | | |

| | | | DISCLO | SURE PROVIDED | | | FREQU | ENCY | |
|---------------------|-----|---|------------------|---|--------|-----------|-------------|-----------------------------|-----------------------------|
| FINANCIAL DISCLO | osı | STATEMENT/ACCOUNTING URES REQUIREMENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | | | | | | | | | |
| | | Where the specific provisions were made after taking into account the value of collateral in respect of non-performing impaired assets, licensees may wish to indicate this in order to put the level of provisioning into perspective. | | | | | | | |
| | | Investment Securities Holdings of held-to-maturity securities, available-for-sale securities, trading securities and other investments in securities should be segregated into the issuer categories below: | | | | | | | |
| | 9 | Central government and central banks Public sector entities Banks and other financial institutions Corporate entities Others | | | | | | | |
| | | The market values of listed securities should also be disclosed. Where securities are unlisted, the method of | | | | | | | |

| | | DISCLO | SURE PROVIDED | | | FREQU | ENCY | |
|----------------------|--|------------------|---|--------|-----------|-------------|-----------------------------|-----------------------------|
| FINANCIAL DISCLOS | STATEMENT/ACCOUNTING URES REQUIREMENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | valuation (e.g., 'fair value') should be disclosed. | | | | | | | |
| 1 | Derivative Financial Instruments ■ Derivatives Held for Trading □ Foreign exchange derivatives, inclusive of: □ Currency forwards □ Currency swaps □ OTC currency options-bought and sold □ Currency futures □ Exchange traded currency options-bought and sold □ Interest rate derivatives, inclusive of: □ Interest rate swaps □ Cross-currency interest rate swaps □ Forward rate agreements □ OTC interest rate options □ Other interest rate contracts □ Exchange traded interest rate futures □ Exchange traded interest rate options □ Embedded equity derivatives, inclusive of: □ Share conversion option on convertible bonds | | | | | | | |

| | | | SURE PROVIDED | | | FREQU | ENCY | |
|---------------------|--|------------------|---|--------|-----------|-------------|-----------------------------|-----------------------------|
| FINANCIAL DISCLO | STATEMENT/ACCOUNTING SURES REQUIREMENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | Derivatives Held for Hedging Derivatives designated as fair value hedges Currency futures Interest rate swaps Cross country interest rate swaps Derivatives designated as cash flow hedges Currency swaps Exchange traded currency options bought Other trading liabilities | | | | | | | |
| | Analysis of the aggregate notional & fair value amounts of each significant class of derivatives instruments | | | | | | | |
| | Risk exposure information on their derivative instruments. In particular, disclose: Aggregate credit risk weighted amounts of exchange rate contracts, interest rate contracts and other derivatives, if any; and Aggregate replacement costs of their exchange rate contracts, interest rate contracts, and other derivatives, if any | | | | | | | |

| | | DISCLO | SURE PROVIDED | | | | | |
|----------------------|---|------------------|---|--------|-----------|-------------|-----------------------------|-----------------------------|
| FINANCIAL DISCLOS | STATEMENT/ACCOUNTING URES REQUIREMENTS | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | Indicate whether derivative amounts take into account the effects of bilateral netting arrangements. | | | | | | | |
| | Pixed Assets Disclose information pertaining to each major class of fixed assets, including i.e. business property, investment properties, plant & equipment, as set out below: Cost or valuation Additions Revaluations Disposals Impairment charge Exchange rate adjustments Accumulated depreciation Net book value The gross amount (before accumulated depreciation) of tangible assets included in the financial statements should be analysed between those included at valuation, if any. For those fixed assets that have been included at valuation, the years in which those assets were valued and the values should be disclosed. | | | | | | | |

| | | | DISCLO | SURE PROVIDED | | | FREQU | ENCY | |
|---|---|--|---|---------------|-----------|-------------|-----------------------------|--------------------------|--|
| FINANCIAL STATEMENT/ACCOUNTING DISCLOSURES REQUIREMENTS | | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** | |
| | | disclose the details of the movements in reserves during the period, including the surplus or deficit on revaluation of properties No undisclosed inner reserves in their balance sheets. | | | | | | | |
| | 1 | A maturity profile of assets and liabilities should be disclosed. The analysis into the relevant maturity groupings should be based on the remaining period to the contractual maturity date as at the balance sheet date. The maturity period groups should be the same for assets and liabilities. | | | | | | | |
| | 1 | Off-balance Sheet Exposures Disclose the contractual or notional amounts of each significant class of off-balance sheet financial instruments or | | | | | | | |

| | | DISCLO | SURE PROVIDED | | FREQUENCY | | | |
|---|---|------------------|---|--------|-----------|-------------|-----------------------------|-----------------------------|
| FINANCIAL STATEMENT/ACCOUNTING DISCLOSURES REQUIREMENTS | | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | the share of the contingent liabilities and capital commitment of an associate for which it is contingently liable, if applicable, including: Direct credit substitutes Transaction-related contingencies Note issuance and revolving underwriting facilities Future contractual commitments Guarantees given by the licensee in respect of financial arrangements entered into with other institutions by customers and group companies Other commitments: With an original maturity of under one year or which are unconditionally cancellable/irrevocable With an original maturity of one year and over Others (including forward asset purchases, amounts owing on partly paid shares and securities, forward deposits placed, asset sales or other transactions with recourse, sale and repurchase | | | | | | | |

| | DISCLO | OSURE PROVIDED | FREQUENCY | | | | |
|---|--------|---|-----------|-----------|-------------|--------------------------|-----------------------------|
| FINANCIAL STATEMENT/ACCOUNTING DISCLOSURES REQUIREMENTS | | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| agreements, interest and foreign exchange rate related items (i.e. swaps, options, and futures)) • Disclose any other off-balance sheet item which is material and the basis of measurement/ valuation for these off-balance sheet exposures. Transactions with Related Parties • Related party relationships where control exists should be disclosed irrespective of whether there have been transactions between related parties. • Where related party transactions exist, disclose the nature of the relationship, the volume of transactions as they relate to asset, liability and off-balance sheet components, such as loans and advances, deposits, acceptances, promissory notes, investments, irrevocable commitments and contingencies. • Disclose lending policies to related parties. • The contribution of related party activities on income and expense should be provided. | N/A | | | | | | |

| | | | DISCLO | SURE PROVIDED | FREQUENCY | | | | |
|---|---|--|---|---------------|-----------|-------------|-----------------------------|-----------------------------|--|
| FINANCIAL STATEMENT/ACCOUNTING DISCLOSURES REQUIREMENTS | | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** | |
| | 1 | Assets Pledged as Security (Encumbered Assets) • Disclose the aggregate amount of secured liabilities and the nature and carrying values of assets pledged as security. | | | | | | | |
| | 1 | Trust Assets Under Administration Disclose the total number of trusts administered and the value of these trusts. | | | | | | | |
| | 1 | Geographical and Sector Information Report/Disclose concentrations of income, profit or loss, assets, liabilities and contingent liabilities and commitments arising from or booked in countries or geographical areas, which are considered to be significant to them. A country or geographical area should generally be reported where it contributes 10% or more of the | | | | | | | |

| | | DISCLO | SURE PROVIDED | FREQUENCY | | | | |
|----------------------|---|--------|---|-----------|-----------|-------------|-----------------------------|-----------------------------|
| FINANCIAL DISCLOS | FINANCIAL STATEMENT/ACCOUNTING DISCLOSURES REQUIREMENTS | | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | relevant disclosure item. Financial information to be disclosed should include: Total operating income Profit or loss before taxation Total assets (investment securities, advances etc.) Total liabilities Contingent liabilities and commitments Disclose the breakdown of the gross amount of advances to customers by industry sectors which are considered to be significant to them. Disclose all other significant concentrations. | | | | | | | |
| 1 | Overdue and Rescheduled Assets Disclose the gross amount of advances and the percentage of such advances to total advances which have been overdue for: Over three to six months Over six months to one year Over one year Disclosure may be made of the value of collateral held against the overdue | | | | | | | |

| | | DISCLO | OSURE PROVIDED | FREQUENCY | | | ENCY | |
|---|--|------------------|---|-----------|-----------|-------------|-----------------------------|-----------------------------|
| FINANCIAL STATEMENT/ACCOUNTING DISCLOSURES REQUIREMENTS | | Yes No N/A | If No or N/A reason disclosure not provided | Annual | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | loans and the amount of specific provisions made. Where licensees opt to disclose the value of collateral held, disclose the split of overdue advances into those which are secured and those which are unsecured and the market value of collateral held against the secured loans based on the most recent estimate. • Disclose the amount of advances to customers and advances to banks and other financial institutions which are: • Not yet overdue and on which interest is being accrued • Not yet overdue and on which interest has been suspended • Overdue for three months or less and on which interest is still being accrued • Overdue three months or less and on which interest accrual has ceased • Overdue for more than three months and on which interest is being accrued • Overdue for more than three months and on which interest is being accrued | | | | | | | |

| | | DISCLO | SURE PROVIDED | FREQUENCY | | | |
|--------------------|---|--------|---|---------------|-------------|-----------------------------|-----------------------------|
| FINANCIAL DISCL | FINANCIAL STATEMENT/ACCOUNTING DISCLOSURES REQUIREMENTS | | If No or N/A reason disclosure not provided | Quarterly | Semi Annual | If other provide details | Location of Disclosure** |
| | Disclose the amount of rescheduled advances, net of those which have been overdue for over three months and the percentage of such advances to total advances to customers. | | | | | | |