

## Risk and Capital Management Disclosures

### Executive summary

This Risk and Capital Management Disclosures encompass the qualitative and quantitative disclosures required by the Central Bank of Bahrain (CBB) in compliance with Basel III guidelines.

The information presented herein pertains to SICO BSC (c) consolidated with its subsidiaries (together termed as “SICO” or the “Bank”).

The report contains a description of the bank’s risk management and capital adequacy practices, including detailed information on the capital adequacy process.

The disclosures have been prepared in accordance with the Public Disclosure Module (“PD”) of the CBB Rule Book, Volume I for Conventional Banks. These disclosures should be read in conjunction with the Notes, in particular the Significant Accounting Policies and Financial Risk Management, in the bank’s Consolidated Financial Statements for the same period. These disclosures have been reviewed by the bank’s external auditors KPMG, based on agreed upon procedures as required under Para PD-A.2.4 of the PD Module.

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### 1. Overview and structure of risk management

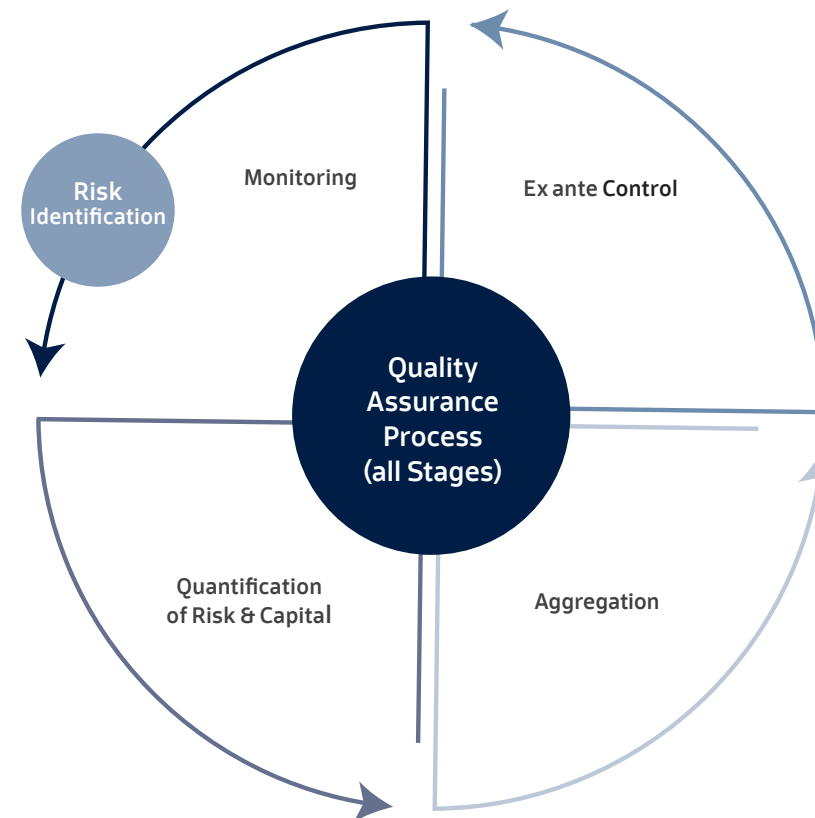
Risk management is the systematic process of identifying, assessing and mitigating the risks to which SICO is exposed. Risk management is essential to the bank’s success, as risk is inherent in its activities. Risks are mitigated by establishing appropriate controls and ensuring that effective monitoring and reporting processes are in place.

The major risk types to which SICO is exposed are:

- Credit risk
- Concentration risk
- Market risk
- Operational risk
- Liquidity risk
- Fiduciary risk
- Legal and regulatory risk
- Reputational risk
- Strategic risk

The bank maintains a strong focus on its risk management framework, capital management and risk governance structure and adopts a structured, consistent and disciplined methodology to align business strategy, processes, people, technology and knowledge to evaluate and manage its risks.

The stages in the risk management process are as follows:



**Risk identification:** Identification of the risks that impact SICO's various business activities.

**Quantification of risks and capital coverage:** This step involves quantifying the risks identified in the risk identification process. It creates the objective basis for decision-making and enables the board and senior management to make decisions regarding SICO's risk-bearing capacity within this framework.

**Aggregation:** Once risks have been identified and quantified, individual risks are aggregated to determine SICO's risk exposure and impact.

**Ex-ante control:** SICO has established various tolerance limits based on the overall risk strategy of the bank. These limits are revised periodically, taking into account changing market and economic conditions. SICO has established a comprehensive limit framework to monitor its exposure to all significant risks.

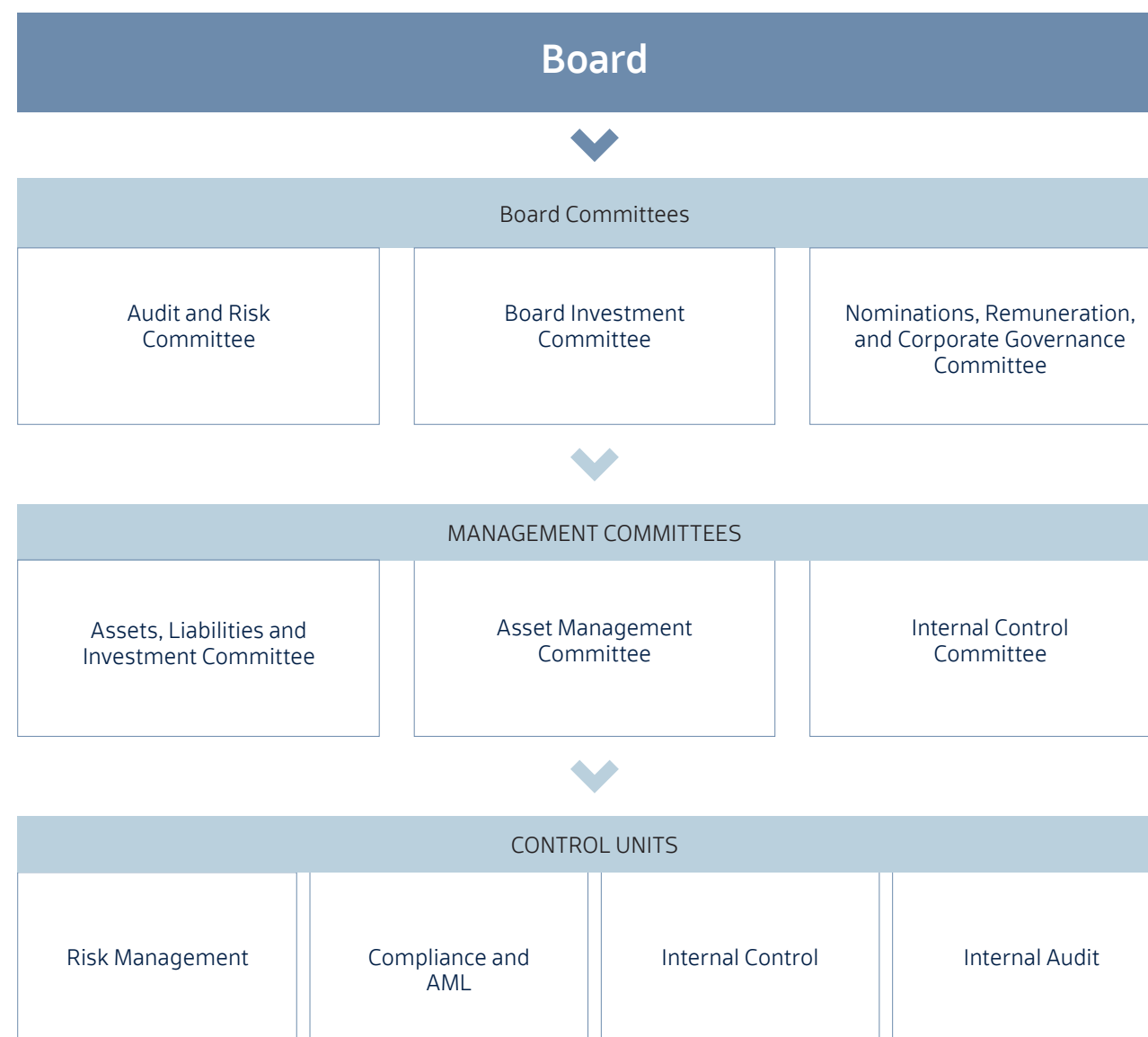
**Risk monitoring and ex-post control:** The risk monitoring process ensures that SICO's risk profile remains in line with its risk tolerance. In this context, there is a standardised procedure for dealing with increasing levels of limit utilisation and limit breaches.

The bank also applies a rigorous framework of limits to control risk across multiple transactions, products, businesses and markets. This includes setting credit and market risk limits at a variety of levels and monitoring these limits on a daily basis. Limits are typically set at levels that may be periodically exceeded, rather than levels that reflect the bank's maximum risk appetite.

## 2. Risk governance structure

SICO has established a strong organisational structure, including disciplined control functions, to support the bank's business strategy and risk management.

SICO's board and senior management are responsible for understanding the nature and level of risks faced by the bank and ensuring that the risk management process chosen is appropriate considering SICO's risk profile. Senior management is responsible for ensuring that there is a process to relate business risk to an adequate level of capital, setting the tolerance for various risks and putting in place the framework and process for measuring and monitoring compliance.



**Board of Directors (BOD):** The BOD is primarily responsible for approving the bank's risk strategy, appetite and policies to manage risks that arise from SICO's business activities. These policies are consistent with the bank's broader business strategies, capital strength, management expertise and ability to control risk.

**Board Investment Committee (BIC):** The BIC is the second stage where decision making surrounding SICO's investment and credit activities is considered. This committee approves investments within its discretionary powers as delegated by the BOD, and in some cases the BIC recommends proposals to the BOD for approval.

**Audit and Risk Committee (ARC):** The ARC is responsible for reviewing the bank's accounting and financial practices to ensure the integrity of the bank's financial statements and adequacy of risk management, compliance and internal control frameworks. The committee also oversees the Internal Audit function. The committee provides active oversight of the risk management framework, approves risk policies and limits and ensures the adequacy of risk controls.

**Nominations, Remuneration and Corporate Governance Committee (NRCGC):** The NRCGC contributes to the control framework by nominating qualified Board Members and candidates for key management positions. It also approves remunerations that factor in the risk taken by the business and oversees corporate governance-related issues.

**Assets, Liabilities and Investment Committee (ALIC):** ALIC acts as the principal policy-making body at the management level which is responsible for overseeing the bank's capital and financial resources. It is also responsible for managing the balance sheet and all proprietary investment activities, including investment strategy, along with asset, country and sector allocations. The committee is specifically responsible for managing balance sheet risk, capital and dividend planning, forecasting and monitoring interest rate risk positions, liquidity and fund management. The committee is also responsible for formulating and reviewing the bank's investment policies (subject to approval by the BOD), strategies and performance measurement and assessment.

**Assets Management Committee (AMC):** AMC is a management committee that oversees the fiduciary responsibilities carried out by the Asset Management unit in managing clients' discretionary portfolios as well as the funds operated and managed by SICO. It also reviews the investment strategy of the bank's funds and portfolios and reviews asset allocations, subscriptions and redemptions and adherence to client guidelines.

**Internal Control Committee (ICC):** The ICC is a management committee that oversees the internal control functions carried out by SICO's various departments. The remit of ICC is to strengthen internal control culture throughout the company and ensure adequacy of controls in the various processes followed in the bank.

**Risk Management Department (RMD):** RMD is responsible for establishing a sound risk management framework to assist the bank in the realisation of its business objectives. It also provides oversight of risk management and risk controls across the organisation by coordinating and communicating with each business unit to manage the risks that arise for its business activities. It also ensures that the principles and requirements of managing risk are consistently adopted throughout the bank.

**Compliance Unit:** The unit is responsible for internal compliance, regulatory compliance and KYC and AML functions. It ensures compliance with internal and external rules and regulations and is responsible for implementing the compliance framework across the entire bank.

**Internal Control Unit:** The unit is responsible for ensuring the internal control framework of the bank's business units is adequate and recommends changes wherever deemed. The unit is also responsible for ensuring that all policies and procedures are followed correctly.

**Internal Audit Unit:** The unit provides an additional line of defence within the bank's risk management and control framework. Internal Audit is primarily responsible for providing independent and objective assurance that the process for identifying, evaluating and managing significant risks faced by the bank is appropriate and effectively applied by all business units, control functions and senior management.

### 3. CBB and basel guidelines

#### CBB Rulebook

This disclosure document has been prepared in accordance with the CBB requirements outlined in the Public Disclosure Module ("PD"), which falls under Volume 1 (Conventional Banks) of the CBB Rulebook. This quantitative disclosure document follows the requirements of Basel III - Pillar 3.

#### Basel III framework

Basel III is a comprehensive set of reform measures, developed by the Basel Committee on Banking Supervision, to strengthen the regulation, supervision and risk management of the banking sector.

Basel III measures aim to:

- Improve the banking sector's ability to absorb shocks arising from financial and economic stress, whatever the source
- Improve risk management and governance
- Strengthen banks' transparency and disclosures

The Basel III Guidelines are based on the following three framework pillars:

- Pillar 1 - Describes minimum capital requirements by applying risk-based methodology in the calculation of risk weighted assets (RWAs) and capital requirements for major asset classes to obtain the capital adequacy ratio (CAR).
- Pillar 2 - Describes supervisory review processes, which include the Internal Capital Adequacy Assessment Process (ICAAP).
- Pillar 3 - Describes market discipline, which includes disclosure of the risk management process, and capital adequacy requirements and guidelines.

BASEL III		
Pillar 1	Pillar 2	Pillar 3
Minimum Capital Requirements	Supervisory Review Process	Market Discipline
Risk-based capital requirements for: <ul style="list-style-type: none"> <li>- Credit risk</li> <li>- Market risk</li> <li>- Operational risk</li> </ul>	Regulatory framework for banks: Internal Capital Adequacy Assessment Process (ICAAP)  Supervisory framework: Supervisory Review and Evaluation Process	Disclosure requirements for banks: <ul style="list-style-type: none"> <li>- Specific quantitative and qualitative disclosures</li> <li>- Transparency for market participants concerning the bank's risk position (scope of application, risk management etc.)</li> <li>- Enhanced comparability between banks</li> </ul>

### Pillar 1

Pillar 1 lays the basis for calculating the regulatory Capital Adequacy Ratio (CAR). It sets out the definition and calculations for RWAs and the derivation of the regulatory capital base. The capital adequacy ratio is calculated by dividing the regulatory capital base by total RWAs.

Below are the approaches used for deriving the CAR:

Approaches for determining regulatory capital requirements		
Credit Risk	Market Risk	Operational Risk
<b>Standardised Approach</b>	<b>Standardised Approach</b>	<b>Basic Indicator Approach</b>
Foundation IRB Approach (Internal Ratings Based)	Internal Models Approach (IMA)	Standardised Approach
Advanced IRB Approach (Internal Ratings Based)		Advanced Measurement Approach (AMA)

SICO has adopted the Standardised Approach for Credit Risk and Market Risk and follows the Basic Indicator Approach for Operational Risk to determine its capital requirements.

### Pillar 2

This pillar sets out the supervisory review and evaluation process of an institution's risk management framework as well as its capital adequacy assessment through the ICAAP framework.

The supervisory review and evaluation process represent the CBB's review of the bank's capital management and an assessment of internal controls and corporate governance. The process is designed to ensure that institutions identify their material risks, allocate adequate capital and employ sufficient resources to support such risks. The process also encourages institutions to develop and apply enhanced risk management techniques for the measurement and monitoring of risks, in addition to the credit, market and operational risks addressed in the core Pillar 1 framework.

Other risk types not covered by the minimum capital requirements in Pillar 1 include liquidity risk, interest rate risk in the banking book, concentration risk, reputational risk and other risks. These are covered either by capital or risk management and mitigation processes under Pillar 2.

Pillar 2 also comprises ICAAP, which incorporates a review and evaluation of capital requirements relative to the risks to which the bank is exposed. The ICAAP addresses all components of the bank's risk management, from the daily management of more material risks to the strategic capital management of the bank. The ICAAP is based on the bank's capital management framework, which is designed to ensure that SICO has sufficient capital resources available to meet regulatory and internal capital requirements, even during periods of economic or financial stress.

### Pillar 3

This pillar describes the level of qualitative and quantitative information that should be disclosed about an institution's risk management and capital adequacy practices.

Under the current regulations, partial disclosure consisting mainly of quantitative analysis is required during half-year reporting, whereas full disclosure is required to coincide with the financial year-end reporting.

### Scope of Application

SICO is a conventional wholesale bank incorporated in Bahrain and regulated by the CBB. SICO provides investment banking services on a regional basis, with a principal focus on the GCC. There is a regulatory requirement to calculate and maintain minimum regulatory capital ratios on both standalone as well as consolidated bases.

The principal subsidiaries that are fully consolidated in the SICO financial statements are SICO Funds Services Company BSC (c) ("SFS"), incorporated in Bahrain which provides custody and fund administration services; SICO Financial Brokerage LLC, incorporated in Abu Dhabi which provides providing brokerage services in the UAE; and SICO US Real Estate Corp (USA) which is the holding company for US real estate investments.

The Bank has controlling interest in SICO Fixed Income Fund ("SFIF"); and therefore, consolidates the SFIF financials as per the requirements of IFRS 10.

## 4. Capital structure and capital adequacy

For the purpose of computing the regulatory capital adequacy ratio, the bank applies the methodology and rules as defined in the CA Module of the CBB's Rule Book. The following should also be considered:

- a. The bank's paid-up capital consists only of ordinary shares that have proportionate voting rights, and the bank does not have any other type of capital instruments.
- b. The bank's Tier 1 capital, which consists of Common Equity Tier 1, comprises share capital, share premium, reserves, retained earnings, eligible reserves and unrealised losses arising from fair valuing equity securities classified under fair value through other comprehensive income.
- c. The bank does not maintain any additional Tier 1 (AT1).
- d. The bank's Tier 2 capital comprises of general provisions recognized under IFRS 9 Expected Credit Losses.
- e. The bank has prepared its capital structure in accordance with the CBB's Basel III capital adequacy framework.
- f. The bank has no subsidiaries and/or investments that are required to be deducted from its capital.
- g. The bank has no restrictions on the transfer of funds or regulatory capital within the group, other than restrictions over transfers to ensure minimum regulatory capital requirements are met for subsidiary companies.

#### 4.1. Capital structure

Common Equity Tier 1 (CET1)	
Issued and fully paid ordinary shares	42,849
Less: Employee stock incentive program funded by the bank (outstanding)	-2,263
Less: Treasury Shares	-5,322
General Reserve	3,217
Legal/Statutory reserves	7,273
Share Premium	761
Retained Earnings brought forward	5,924
Current interim cumulative net income/losses	6,034
Securitisation exposures subject to deduction	-
Accumulated other comprehensive income and losses	876
Less: Investment in financial entities where ownership is < 10% of issued common share capital (amount above 10% CET1a)	-
<b>Total Common Equity Tier 1 Capital (A)</b>	<b>59,349</b>
Other Capital (AT1 & Tier 2)	
Instruments issued by parent company	-
Instruments issued by banking subsidiaries to third parties	-
Share premium	-
Assets revaluation reserve - property, plant and equipment	-
General loan loss provisions	-
Expected Credit Losses (ECL) Stages 1 & 2	70
<b>Total AT1 &amp; Tier 2 (B)</b>	<b>70</b>
<b>Total Available Capital (C) = (A) + (B)</b>	<b>59,419</b>
Credit risk weighted exposures	56,530
Market risk weighted exposures	18,388
Operational risk weighted exposures	18,559
<b>Total Risk weighted exposures (D)</b>	<b>93,477</b>
<b>CET1 Capital Ratio (A) / (D)</b>	<b>63.49%</b>
<b>Total Capital Adequacy Ratio (C) / (D)</b>	<b>63.57%</b>

#### 4.2. Capital adequacy ratio

Consolidated and subsidiaries above 5% of Group capital

Subsidiaries	Total capital adequacy ratio	Tier 1 capital ratio
SICO Consolidated (Group)	63.57%	63.49%
SICO Fund Services Company BSC @	439.27%	439.27%
SICO Financial Brokerage LLC	4.11	2.75

\* SICO Financial Brokerage LLC (UAE) CAR has been computed using the capital charges as outlined in Emirates Securities and Commodities Authority (ESCA) regulations, wherein the minimum required ratio is 1.0 with anything above 1.25 considered healthy.

#### 4.3. Internal capital adequacy assessment process

The bank's capital management framework is intended to ensure that there is sufficient capital to support the underlying risks of the bank's business activities and maintain a well-capitalised status under regulatory requirements. The bank has a comprehensive Internal Capital Adequacy Assessment Process (ICAAP) that includes board and senior management oversight, monitoring, reporting and internal control reviews, to identify and measure the various risks that are not covered under Pillar 1 risks and to regularly assess overall capital adequacy considering the risks and the bank's planned business strategies. The non-Pillar 1 risks covered under the ICAAP process include liquidity risk, interest rate risk in the banking book, concentration risk, reputational risk and others. The ICAAP also keeps in perspective the bank's strategic plans, growth expectations, future sources and uses of funds, dividend policy and the impact of all these on maintaining adequate capital levels. In addition, the ICAAP process also includes stress testing on the bank's capital adequacy to determine capital requirements and planning to ensure that the bank is adequately capitalised in line with the overall risk profile. The bank has complied with regulatory capital requirements throughout the year.

#### 4.4. Regulatory capital disclosures

The capital reconciliation approach shows the link between the balance sheet in the published financial statements and the numbers that are used in the composition of capital disclosure.

For the three-step approach for reconciliation of regulatory capital, please refer to the relevant appendix.

Appendix 1	Step 1: Balance sheet under the regulatory scope of consolidation
Appendix 2	Step 2: Reconciliation of published financial balance sheet to regulatory reporting
Appendix 3	Step 3: Composition of Capital Common Template (transition)
Appendix 4	Disclosure template for main features of regulatory capital instruments

## 5. Credit risk

Credit risk represents the potential for financial loss resulting from the failure of a borrower or counterparty to honour its financial or contractual obligations. The bank's exposure to credit risk comes mostly from:

- Cash placed with banks and financial institutions
- Proprietary investments in fixed income instruments
- Overdrafts to brokerage clients
- Settlement risks with delivery versus payment (DVP) customers, counterparty brokers and custodians
- Secured financing transactions (i.e. REPO and reverse REPO)
- Margin trading facilities

Risk management works in coordination with business units in identifying and aggregating credit exposures. Credit risk also encompasses the following risks to which SICO is exposed and are being effectively managed as a part of the Credit Risk Management strategy:

**Counterparty Risk:** SICO deals with different counterparties for its money market placements, brokerage and REPO activities. To measure counterparty risk, SICO performs a detailed assessment of counterparty risk using both qualitative and quantitative factors.

**Settlement Risk:** SICO is exposed to settlement risk through its brokerage services on unfunded deals where exposure remains until settlement of the trade or transaction. SICO assesses its clients using several criteria during the screening process and on a subsequent periodic basis to minimise settlement risk.

**Default Risk:** As part of SICO's margin trading facilities and reverse REPO, it is exposed to the risk of default wherein individuals and corporates may be unable to make the required payments on their obligations. SICO only accepts liquid securities as collateral and applies haircuts to the collateral value, which acts as a margin of safety in case it is to offset collateral against outstanding obligations. Moreover, SICO employs margin calls to ensure collateral coverage does not drop below the agreed parameters.

To measure the aforementioned credit risk components, SICO employs several methodologies for mitigating credit risk. SICO also uses ratings issued by external credit assessment institutions (ECAIs), such as Standard & Poor's, Moody's and Fitch, to derive the risk weightings under the CBB's Basel III capital adequacy framework. These ratings are used mainly for banks and financial institutions, but also, where applicable, for other exposures such as debt instruments. Where ratings vary between rating agencies, the more conservative rating is adopted.

Credit risk is monitored and controlled by policies and procedures that are put in place by RMD and that have been approved by the board. The policy framework establishes approval authorities, concentration limits, risk-rating methodologies and guidelines for managing exposures. For lending exposures such as margin trading and reverse REPO, financial securities

obtained as collateral are liquid in nature, and appropriate haircuts are also applied to them. The lending exposures are closely monitored along with their collaterals, which are marked to market on a daily basis, and margin calls are enforced where collateral coverage drops below the required level. The bank also adheres strictly to the large exposure norms as prescribed by the CBB under the Credit Risk Management Module.

The Bank maintains collective impairment provisions in line with the requirements under IFRS 9. The collective impairment provision is a forward-looking calculation and is established based on various factors. These factors include credit risk ratings of the counterparty, historical default rates adjusted considering multiple scenarios of the future macroeconomic outlook, loss ratios given an event of default and rating migrations.

### 5.1. Gross credit exposures

As at 31st December 2019	Credit exposure before CRM	Eligible CRM	Credit exposure after CRM	Average Risk Weight	Risk weighted exposure	Capital requirement @ 12.5%
Cash items	-	-	-	-	-	-
Claims on sovereigns	40,634	-	40,634	0%	-	-
Claims on Bahraini PSE	500	-	500	0%	-	-
Claims on banks	67,202	11,911	55,291	31.32%	17,318	2,165
Claims on corporates	22,426	12,497	9,929	100.13%	9,942	1,243
Claims on investment firms	10	-	10	50.00%	5	1
Regulatory retail portfolios	6,837	6,837	0	-	0	0
Investments in securities	10,791	-	10,791	117.22%	12,650	1,581
Holdings in real estate	4,366	-	4,366	200.00%	8,732	1,092
Other assets	7,884	-	7,884	100.00%	7,884	986
<b>Total Funded</b>	<b>160,649</b>	<b>31,245</b>	<b>129,404</b>		<b>56,530</b>	<b>7,066</b>
Off-Balance Sheet exposures	7,285	-	7,285	100.00%	7,285	911

The on-balance sheet and off-balance sheet gross exposures have been risk weighted using applicable risk weights and credit conversion factors (CCF).

The balances above are representative of the position during the period. Hence, the average balances for the year are not separately disclosed.

## 5.2. Maturity profile

As at 31st Dec 2019	Less than 1 year	Over 1 year to 5 years	5-10 year	10-20 years	Above 20 years	Total
Cash and cash equivalents	35,075	-	-	-	-	<b>35,075</b>
Treasury bills	4,261	-	-	-	-	<b>4,261</b>
Placements with banks	21,480	-	-	-	-	<b>21,480</b>
Securities bought under repurchase agreements	51,106	-	-	-	-	<b>51,106</b>
Investments at fair value through profit or loss	1,243	6,318	1,844	-	10,671	<b>20,076</b>
Investments at fair value through other comprehensive income	-	-	4,169	-	4,959	<b>9,128</b>
Investments at amortized cost	-	1,169	8,802	-	-	<b>9,971</b>
Investments in properties	-	-	1,915	-	-	<b>1,915</b>
Furniture, equipment and intangibles	49	1,017	605	-	-	<b>1,671</b>
Fees receivable	3,523	-	-	-	-	<b>3,523</b>
Other assets	8,076	-	500	-	-	<b>8,576</b>
<b>Total gross credit exposures</b>	<b>124,813</b>	<b>8,504</b>	<b>17,835</b>	<b>-</b>	<b>15,630</b>	<b>166,782</b>
Commitments	3,279	-	-	-	-	<b>3,279</b>
Contingents	5,645	-	-	-	-	<b>5,645</b>

*Note: Commitments and contingencies mentioned above do not have a defined maturity and hence conservatively considered less than 1 year.*

## 5.3. Sectoral Distribution

As at 31st Dec 2019	Financial	Sovereign	Diversified Funds	Real Estate	Others	Total
Cash and Bank balances	34,960	92	0	0	3	35,055
Treasury bills	0	4,261	0	0	0	4,261
Placements with banks	21,500	0	0	0	0	21,500
Securities bought under repurchase agreements	28,144	20,950	0	0	2,012	51,106
Investments at fair value through profit or loss	4,278	3,081	7,734	2,658	2,325	20,076
Investments at fair value through other comprehensive income	3,516	3,388	0	718	1,506	9,128
Investments at amortized cost	0	9,971	0	0	0	9,971
Investments in properties	0	0	0	1,915	0	1,915
Fees receivable	0	0	0	0	3,523	3,523
Other assets	0	0	0	0	10,247	10,247
<b>Total assets</b>	<b>92,398</b>	<b>41,743</b>	<b>7,734</b>	<b>5,291</b>	<b>19,616</b>	<b>166,782</b>

## 5.4. Geographical distribution

As at 31st December 2019	Middle East and Asia	North America	Europe	Total
Cash and bank balances	46,349	957	9,249	56,555
Treasury bills	4,261	-	-	4,261
Placements with banks	-	-	-	0
Securities bought under repurchase agreements	48,185	-	2,921	51,106
Investments at fair value through profit or loss	15,768	1,085	3,223	20,076
Investments at fair value through other comprehensive income	9,128	-	-	9,128
Investments at amortized cost	9,971	-	-	9,971
Investments in properties	-	1,915	-	1,915
Fees receivable	3,511	-	12	3,523
Furniture, equipment and intangibles	1,671	0	0	1,671
Other assets	8,563	1	12	8,576
<b>Total assets</b>	<b>147,407</b>	<b>3,958</b>	<b>15,417</b>	<b>166,782</b>

### Large exposure limits

The following exposures were in excess of the 15% large exposure limit as defined in the Credit Risk Management Module of the CBB's rulebook. However, these exposures qualified to be considered as exempt from the large exposure limits of CBB on account of their short-term tenor (of less than 3 months) and inter-bank nature.

Counterparty	Country	Amount	Exposure as a % to eligible capital base
Central Bank of Bahrain	Bahrain	15,576	26%
Al Salam Bank	Bahrain	10,086	17%
Euroclear Bank	Belgium	9,249	16%

## 6. Market risk

Market risk is the risk of loss in the value of any financial instrument due to an adverse fluctuation in equity prices, interest rates and foreign exchange rates, whether arising out of factors affecting specific instruments or the market in general.

The bank's exposure to market risk primarily comes from its investment and trading activities that are conducted by its Proprietary Investments Unit. The bank invests and trades across different products, such as equities and fixed income, and through different types of funds in regional and international markets.

Market risk is primarily controlled and mitigated through a series of different layers of limits and maintaining a dynamic investment allocation. These limits reflect the bank's risk appetite in the context of the market environment and business strategy. In setting limits, the bank takes into consideration many factors, including market volatility, product liquidity and risk appetite.

These limits are adhered to by the Proprietary Investments Unit and are monitored independently by RMD. Market risk is also monitored and controlled by policies and procedures that are put in place and followed across the bank. The policy framework establishes and clearly defines the approval authorities and portfolio review parameters.

Market risk encompasses the following risks to which SICO is exposed and are being effectively managed as a part of the Market Risk Management strategy:

- Equity price risk
- Interest rate risk
- Currency risk

The market risk weighted assets and capital requirement is computed as follows:

	Market Risk Weighted Assets			Capital Requirement @ 12.5%
	During the year to date period		As at 31-Dec-19	
	Minimum	Maximum		
Interest Rate Position Risk	635	1,085	1,085	136
Equities Position Risk	236	1,766	356	44
Foreign Exchange Risk	30	159	30	4
Total min capital required for market risk			1,471	184
Multiplier			12.5	12.5
<b>Total</b>			<b>18,388</b>	<b>2,300</b>

### 6.1. Equity price risk

A significant portion of the bank's proprietary investments portfolio comprises equity instruments that are affected by equity price risk. Uncertain conditions in equity markets are carefully considered by rebalancing asset allocations to minimise risk exposures. This risk is also mitigated by managing the portfolio within duly approved investment guidelines and other investment limits. These are closely monitored by RMD and regularly reviewed by ALIC.

SICO's risk management approach continues to be forward-looking, proactive and highly effective in rebalancing its investment portfolio in line with the bank's investment strategy to ensure capital preservation, quality and liquidity.

### Equity positions in banking book

	Gross Exposure	Risk Weighted Assets	Capital requirement @ 12.5%
Equity investments			
- Listed	3340	3340	417
- Unlisted	-	-	-
Investment in rated funds	-	-	-
Investment in unrated funds - listed/unlisted	7,451	9,310	1,164
<b>Total</b>	<b>10,791</b>	<b>12,650</b>	<b>1,581</b>

### 6.2. Interest rate risk

Interest rate risk is the risk where changes in market interest rates might adversely affect the bank's financial condition. Investments in debt instruments, lending to counterparties through repos, bank placements, as well as bank borrowings and repo borrowings give rise to interest rate risk. The Treasury Unit monitors and manages these exposures to mitigate this risk.

A reasonable spread is maintained between money market placements and deposit interest rates. Treasury assets and liabilities are maintained in closely matching maturity buckets in highly liquid, short-term money market vehicles to avoid any material mismatch. Moreover, SICO does not trade speculatively in derivatives.

Bank placements are mostly short-term (less than three months) with a fixed interest rate and are subject to re-pricing risk at rollover. Investments in bonds are subject to interest rate risk, which the bank controls by managing the portfolio duration through combining floaters and short-duration bonds along with longer-duration ones.



## 6.2(a). Interest rate risk sensitive assets and liabilities

As at 31 <sup>st</sup> December 2019	Effective Interest rate% p.a.	Within 1 year	Over 1 year	Non- interest sensitive	Total
Cash and bank balances	-	-	-	32,963	<b>32,963</b>
Call deposits	-	2,112	-	-	<b>2,112</b>
Treasury bills	1.29%	4,261	-	-	<b>4,261</b>
Short-term placements with banks	1.65%	21,480	-	-	<b>21,480</b>
Securities bought under repurchase agreements	2.66%	51,106	-	-	<b>51,106</b>
Investments at fair value through profit or loss	5.82%	1,620	7,943	10,513	<b>20,076</b>
Investments at fair value through other comprehensive income	6.65%	-	4,169	4,959	<b>9,128</b>
Investments at amortized cost	6.65%	-	9,971	-	<b>9,971</b>
Investments in properties	-	-	-	1,915	<b>1,915</b>
Fees receivable	-	-	-	3,523	<b>3,523</b>
Other assets	-	-	-	8,576	<b>8,576</b>
Furniture, equipment and intangibles	-	-	-	1,671	<b>1,671</b>
<b>Total Assets</b>		<b>80,579</b>	<b>22,083</b>	<b>64,120</b>	<b>166,782</b>
Short-term bank borrowings	2.60%	3,770	-	-	<b>3,770</b>
Securities sold under repurchase agreements	2.40%	55,548	-	-	<b>55,548</b>
Customer accounts	-	-	-	41,340	<b>41,340</b>
Other liabilities	-	-	-	6,138	<b>6,138</b>
Payable to unit holders in consolidated funds	-	-	-	622	<b>622</b>
<b>Total Liabilities</b>		<b>59,318</b>	<b>-</b>	<b>48,100</b>	<b>107,418</b>
<b>Total Equity</b>				<b>59,364</b>	<b>59,364</b>
<b>Total Liability and Equity</b>		<b>59,318</b>	<b>-</b>	<b>107,464</b>	<b>166,782</b>
Interest rate sensitivity Gap		21,261	22,083	(43,344)	
Cumulative Interest rate sensitivity gap		21,261	43,344	-	

The bank also applies stress testing to monitor interest rate shocks on its banking book on a periodic basis.

## 6.2(b) Interest rate risk in the banking book

A 50 bps, 100 bps and 200 bps increase/decrease in market interest rates would affect the value of the fixed rate debt instruments in the banking book as follows:

Amount in BD '000					
50 bps increase	100 bps increase	200 bps increase	50 bps decrease	100 bps decrease	200 bps decrease
-366.4	-732.8	-1,465.7	366.4	732.8	1,465.7

The interest rate risk on the bank's placements, reverse-repo loans and short-term borrowings is considered minimal, and hence no sensitivity analysis has been presented. Moreover, on the liabilities side, customer liabilities are not interest rate sensitive. The short-term borrowings are at fixed rates wherein the interest rate risk is considered minimal and therefore, no sensitivity analysis has been presented.

There has been no currency sensitivity analysis provided since the bank invests in securities in USD and/or USD-pegged currencies only.

## 6.3. Currency risk

A substantial portion of SICO's business is transacted in Bahraini Dinar, GCC currencies and United States Dollar. The bank's exposure to foreign currencies is minimal and hence the foreign exchange risk is low. Foreign exchange rate risk is managed by applying appropriate limits that are set in accordance with the bank's strategic plans and risk tolerance, determined by ALIC and approved by the BOD. Treasury manages these positions on an ongoing basis, hedging such exposures as appropriate, while RMD along with ALIC regularly review such positions.

## 7. Operational risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, systems, human factors, or external events. Unlike market or credit risks, which are systemic in nature, operational risk is institution-specific and is inherent in the day-to-day operations of the bank. This risk could arise from a broad spectrum of causes such as deficient transaction processing, business practices, workplace practices, system failures, human errors, business interruptions and damage to physical assets. Operational risk also includes internal and external fraud.

The bank has sound internal control measures in place, consisting of an operating policies and procedures framework, compliance initiatives and adequate and skilled personnel, which are the key to successful operational risk management. The bank has a very conservative control philosophy and adopts a number of mechanisms to manage this risk. These include a well-defined organisational structure, approved policies and procedures guidelines, segregation of duties, approval authorities, periodic reconciliations and various limits. Internal Control, Compliance and Internal Audit functions support this activity. The bank has a Risk and Controls Self-Assessment (RCSA) framework in place to review and manage its operating risks.

The operational risk weighted assets are computed as per the guidelines of the CBB, which are as follows:

**Average gross income for the past three years (excluding extraordinary and exceptional income)**

	2016	2017	2018
Gross income	7,673	9,993	12,029
Average gross income (A)			9,898
Alpha (B)			15%
(C) = (A) * (B)			1,485
<b>Risk weighted exposures (D) = (C) * 12.5)</b>			<b>18,559</b>
<b>Capital requirement @ 12.5% of (D)</b>			<b>2,320</b>

**8. Other risks****8.1. Concentration risk**

Concentration risk arises when the bank's exposure is concentrated with one or more related counterparties, assets classes, sectors or geographies. Weakness in the counterparty or assets, sector or country may place SICO under considerable risk and potential loss.

The bank complies strictly with the extensive exposure norms prescribed by the CBB in the Credit Risk Management Module of the CBB's rule book.

The bank continues its efforts to maintain an acceptable level of concentration by adhering to the limits set by the investment guidelines.

**8.2. Liquidity risk**

Liquidity risk is the inability to meet contractual and contingent financial obligations, on- or off-balance sheet, as they are due, as a result of the potential inability to liquidate financial assets at the required time and price to cope with a pay out of liabilities or investment obligations in assets. Such risks may arise from a depletion of cash and cash equivalents, investments turning illiquid and mismatches in the maturity pattern of assets and liabilities.

The bank's Treasury Unit manages this risk by monitoring settlement obligations and maintaining sufficient liquid assets, including call deposits and short-term placements, with the bank's liquidity position being monitored on a daily basis. Maturity mismatches of its maturity profile are also monitored and reported to the ALIC and board. Moreover, the bank's investment book, which is also majorly invested in liquid assets, provides support to the bank's liquidity profile. Liquidity risk is also managed through ensuring compliance with regulatory liquidity requirements. Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) are the ratios followed by the bank as per CBB requirements.

**8.3. Fiduciary risks**

Fiduciary risk is defined as the risk that arises where funds entrusted to a financial institution through investments or trusts or agency accounts are: (i) not properly managed, (ii) not used for the intended purposes, (iii) not properly recorded and accounted for and (iv) not achieving value-for-money objectives.

The RMD carries out risk assessment on the various fiduciary activities of the bank by working alongside the bank's relevant lines of business and committees to ensure SICO fulfils its fiduciary duties to asset management, fund administration and custody clients, wherein it adopts the appropriate standards relative to the fiduciary relationship with a client. Below are the various activities carried out by SICO and its subsidiary SFS that can give rise to the following fiduciary risks:

**Asset Management:** The bank has a range of controls to support the quality of the investment process, supervised by the Asset Management Committee (AMC). There are operating policies and procedures and Investment Guidelines, coupled with dedicated buy-side research and other guidelines to support this activity. There are also strict operational controls to protect clients' assets, a staff code of conduct and 'Chinese walls' to avoid any conflicts of interest.

RMD and Compliance regularly monitor the activities of the Asset Management division and report their findings and observations to the AMC and in the periodic compliance reports sent to clients.

**Custody and Fund Administration:** The bank's custody and fund administration activities are handled by SFS, which operates as a standalone subsidiary. SFS has put in place a number of operating controls, including the monitoring and reporting of securities position reconciliations.

**Corporate Finance:** This activity is subject to legal and reputation risk. Such risks are mitigated by obtaining the necessary legal and regulatory approvals. Advisory and underwriting matters are monitored and controlled by senior management.

**8.4. Business continuity**

SICO has in place business continuity plans (BCPs) to ensure the bank's business operations and functions are carried out in case of any disturbance or unexpected events affecting business operations. The BCP provides each business line with the necessary guidelines and procedures in case of an emergency or disaster. The bank has established a business continuity centre at a different location within the Kingdom of Bahrain, which maintains a fully operational status and is capable of carrying out the majority of the bank's operational activities. The effectiveness of the business continuity centre has been tested by conducting actual business from the BCP site as required under CBB regulations.

**8.5. Compliance risk**

Compliance risk relates to current and prospective risk to earnings or capital arising from the violation of or non-compliance with laws, regulations, rules, prescribed practices, contractual agreements or ethical standards. Compliance risk can lead to diminished reputation, limited business opportunities, reduced expansion potential and even the cessation of operations. The bank ensures adherence to all applicable regulations provided by various regulatory authorities, including regulations by the CBB and Bahrain Bourse. In addition, the bank's internal policies ensure that its practices are in line with best market practices.

**8.6. Legal risk**

Legal risk is risk from uncertainty due to legal actions or uncertainty in the applicability or interpretation of contracts, laws or regulations. There are ongoing lawsuits against the company and based on our assessment, we do not consider the need for the creation of any provision in the consolidated financial statements with respect to these lawsuits.

**APPENDIX 1****Step 1: Balance sheet under the regulatory scope of consolidation**

This step is not applicable to the bank since there is no difference between the regulatory consolidation and the accounting consolidation.

## APPENDIX 2

## Step 2: Reconciliation of published financial balance sheet and regulatory reporting

	Published financial statements 31-Dec-19	Consolidated PIR data* 31-Dec-19
<b>Assets</b>	<b>BD '000</b>	<b>BD '000</b>
Cash and cash equivalents	56,555	56,580
of which cash and balances at central banks		92
of which placements with banks and financial institutions		21,502
Treasury bills	4,261	4,261
Securities bought under repurchase agreement	51,106	51,118
Investments at fair value through profit and loss	20,076	20,076
Investments at fair value through other comprehensive income	9,128	9,128
Investments at amortized cost	9,971	9,971
Investment in properties	1,915	1,915
Fees receivable	3,523	3,523
Other assets	8,576	8,587
of which loans and advances (margin receivables)		6,220
of which interest receivable		634
of which other assets		1,733
Furniture, equipment and intangibles	1,671	1,671
<b>Total assets</b>	<b>166,782</b>	<b>166,830</b>

	Published financial statements 31-Dec-19	Consolidated PIR data* 31-Dec-19
<b>Liabilities</b>		
Short-term bank borrowings	3,770	3,770
Securities sold under repurchase agreement	55,548	55,548
Customer accounts	41,340	41,340
Other liabilities	6,138	6,131
of which Interest payable		85
of which other liabilities		6,046
Payable to other unitholders (Other liabilities)	622	622
<b>Total liabilities</b>	<b>107,418</b>	<b>107,411</b>
<b>Shareholders' Equity</b>		
Share capital - eligible for CET1	42,849	42,849
Shares under employee share incentive scheme	(2,263)	(2,263)
Treasury shares	(5,322)	(5,322)
Statutory reserves	8,034	8,034
of which share premium		761
of which legal reserve		7,273
General reserves	3,217	3,217
Investments fair value reserves	891	876
of which unrealized gains from fair valuing equities		476
of which unrealized gains from other financial instruments		400
Retained earnings	11,958	11,958
of which retained earnings brought forward from previous year		5,924
of which net profits for the current period		6,034
Expected credit losses (Stages 1 & 2)		70
<b>Total shareholder equity</b>	<b>59,364</b>	<b>59,419</b>
<b>Total liabilities and equity</b>	<b>166,782</b>	<b>166,830</b>

\*The figures are gross of expected capital loss.

## APPENDIX 3

## Step 3: Composition of Capital Common Template (transition)

Composition of capital and mapping to regulatory reports	Component of regulatory capital (BD '000s)	Amounts subject to pre-2015 treatment	Source based on reference no. of the balance sheet under the regulatory scope of consolidation from step 2
<b>Common Equity Tier 1 capital: instruments and reserves</b>			
1	Directly issued qualifying common share capital (and equivalent for non-joint stock companies) plus related stock surplus	42,849	
2	Retained earnings	5,924	
3	Accumulated other comprehensive income (and other reserves)	876	
4	Not applicable	-	
5	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)	-	
<b>6</b>	<b>Common Equity Tier 1 capital before regulatory adjustments</b>	<b>59,349</b>	
<b>Common Equity Tier 1 capital: regulatory adjustments</b>			
7	Prudential valuation adjustments	-	
8	Goodwill (net of related tax liability)	-	
9	Other intangibles other than mortgage-servicing rights (net of related tax liability)	-	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)	-	
11	Cash-flow hedge reserve	-	
12	Shortfall of provisions to expected losses	-	
13	Securitization gain on sale (as set out in paragraph 562 of Basel II framework)	-	
14	Investment in CET1 of subsidiaries	-	
15	Defined-benefit pension fund net assets	-	
16	Investments in own shares (if not already netted off paid-in capital on reported balance sheet)	-	
17	Reciprocal crossholdings in common equity	-	
18	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued share capital (amount above 10% threshold)	-	
19	Significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions (amount above 10% threshold)	-	
20	Mortgage servicing rights (amount above 10% threshold)	-	

Composition of capital and mapping to regulatory reports	Component of regulatory capital (BD '000s)	Amounts subject to pre-2015 treatment	Source based on reference no. of the balance sheet under the regulatory scope of consolidation from step 2
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability)	-	
22	Amount exceeding the 15% threshold	-	
23	of which: significant investments in the common stock of financials	-	
24	of which: mortgage servicing rights	-	
25	of which: deferred tax assets arising from temporary differences	-	
26	National specific regulatory adjustments	-	
	Regulatory adjustments applied to common equity tier 1 in respect of amounts subject to pre-2015 treatment	-	
	Investment in financial entities where ownership is < 10% of issued common share capital	-	
27	Regulatory adjustments applied to Common Equity Tier 1 due to insufficient Additional Tier 1 and Tier 2 to cover deductions	-	
<b>28</b>	<b>Total regulatory adjustments to Common Equity Tier 1</b>	<b>-</b>	
<b>29</b>	<b>Common Equity Tier 1 capital (CET1)</b>	<b>59,349</b>	
<b>Additional Tier 1 capital: instruments</b>			
30	Directly issued qualifying Additional Tier 1 instruments plus related stock surplus	-	
31	of which: classified as equity under applicable accounting standards	-	
32	of which: classified as liabilities under applicable accounting standards	-	
33	Directly issued capital instruments subject to phase out from Additional Tier 1	-	
34	Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group AT1)	-	
35	of which: instruments issued by subsidiaries subject to phase out	-	
36	Additional Tier 1 capital before regulatory adjustments	-	
<b>Additional Tier 1 capital: regulatory adjustments</b>			
37	Investments in own Additional Tier 1 instruments	-	
38	Reciprocal crossholdings in Additional Tier 1 instruments	-	
39	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above 10% threshold)	-	

Composition of capital and mapping to regulatory reports	Component of regulatory capital (BD '000s)	Amounts subject to pre-2015 treatment	Source based on reference no. of the balance sheet under the regulatory scope of consolidation from step 2
40 Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)	-		
41 National specific regulatory adjustments	-		
Regulatory adjustments applied to additional tier 1 in respect of amounts subject to pre-2015 treatment	-		
Of which: [insert name of adjustment]	-		
Of which:	-		
42 Regulatory adjustments applied to Additional Tier 1 due to insufficient Tier 2 to cover deductions	-		
43 Total regulatory adjustments to Additional Tier 1 capital	-		
<b>44 Additional Tier 1 capital (AT1)</b>	<b>-</b>		
<b>45 Tier 1 capital (T1 = CET1 + AT1)</b>	<b>59,349</b>		
<b>Tier 2 capital: instruments and provisions</b>			
46 Directly issued qualifying Tier 2 instruments plus related stock surplus	-		
47 Directly issued capital instruments subject to phase out from Tier 2	-		
48 Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier 2)	-		
49 Of which: instruments issued by subsidiaries subject to phase out	-		
50 Provisions	-		
Expected credit losses (stage 1 & 2)	70		
51 Tier 2 capital before regulatory adjustments	-		
Tier 2 capital: regulatory adjustments	-		
52 Investments in own Tier 2 instruments	-		
53 Reciprocal crossholdings in Tier 2 instruments	-		
54 Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above the 10% threshold)	-		
55 Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)	-		
56 National specific regulatory adjustments	-		
<b>57 Total regulatory adjustments to Tier 2 capital</b>	<b>70</b>		
<b>58 Tier 2 capital (T2)</b>	<b>70</b>		
<b>59 Total capital (TC = T1 + T2)</b>	<b>59,419</b>		

Composition of capital and mapping to regulatory reports	Component of regulatory capital (BD '000s)	Amounts subject to pre-2015 treatment	Source based on reference no. of the balance sheet under the regulatory scope of consolidation from step 2
Risk weighted assets in respect of amounts subject to pre-2015 treatment	-		
Of which: significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible	-		
<b>60 Total risk weighted assets</b>	<b>93,477</b>		
<b>Capital ratios</b>			
<b>61 Common Equity Tier 1 (as a percentage of risk weighted assets)</b>	<b>63.49%</b>		
<b>62 Tier 1 (as a percentage of risk weighted assets)</b>	<b>63.49%</b>		
<b>63 Total capital (as a percentage of risk weighted assets)</b>	<b>63.57%</b>		
64 Institution specific buffer requirement (minimum CET1 requirement plus capital conservation buffer plus countercyclical buffer requirements plus D-SIB buffer requirement expressed as a percentage of risk weighted assets)	9%		
65 Of which: capital conservation buffer requirement	2.5%		
66 Of which: bank specific countercyclical buffer requirement (N/A)	0%		
67 Of which: D-SIB buffer requirement (N/A)	0%		
<b>68 Common Equity Tier 1 available to meet buffers (as a percentage of risk weighted assets)</b>	<b>63.49%</b>		
<b>National minima including CCB (if different from Basel 3)</b>			
69 CBB Common Equity Tier 1 minimum ratio	9%		
70 CBB Tier 1 minimum ratio	10.5%		
71 CBB total capital minimum ratio	12.5%		
<b>Amounts below the thresholds for deduction (before risk weighting)</b>			
72 Non-significant investments in the capital of other financials	-		
73 Significant investments in the common stock of financials	-		
74 Mortgage servicing rights (net of related tax liability)	-		
75 Deferred tax assets arising from temporary differences (net of related tax liability)	-		
<b>Applicable caps on the inclusion of provisions in Tier 2</b>			
76 Provisions eligible for inclusion in Tier 2 in respect of exposures subject to standardized approach (prior to application of cap)	-		
77 Cap on inclusion of provisions in Tier 2 under standardized approach (1.25% of Credit Risk-weighted Assets)	-		
78 NA	-		
79 NA	-		

Composition of capital and mapping to regulatory reports		Component of regulatory capital (BD '000s)	Amounts subject to pre-2015 treatment	Source based on reference no. of the balance sheet under the regulatory scope of consolidation from step 2
<b>Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2020 and 1 Jan 2024)</b>				
80	Current cap on CET1 instruments subject to phase out arrangements	-		
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-		
82	Current cap on AT1 instruments subject to phase out arrangements	-		
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-		
84	Current cap on T2 instruments subject to phase out arrangements	-		
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-		

## APPENDIX 4

Disclosure template for main feature of regulatory capital instruments

Disclosure template for main features of regulatory capital instruments		
1	Issuer	SICO BSC ( c )
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	SICO BI EQUITY (BLOOMBERG ID)
3	Governing law(s) of the instrument	Commercial Companies Law, Bahrain
Regulatory treatment		
4	Transitional CBB rules	NA
5	Post-transitional CBB rules	NA
6	Eligible at solo/group/group & solo	Yes
7	Instrument type (types to be specified by each jurisdiction)	Common shares
8	Amount recognized in regulatory capital (currency in mil, as of most recent reporting date)	BD 40.59 million
9	Par value of instrument	100 fils per share
10	Accounting classification	Shareholders' equity
11	Original date of issuance	1995
12	Perpetual or dated	NA
13	Original maturity date	NA
14	Issuer call subject to prior supervisory approval	NA
15	Optional call date, contingent call dates and redemption amount	NA
16	Subsequent call dates, if applicable	NA

## Disclosure template for main features of regulatory capital instruments

**Coupons / dividends**

17	Fixed or floating dividend/coupon	NA
18	Coupon rate and any related index	NA
19	Existence of a dividend stopper	NA
20	Fully discretionary, partially discretionary or mandatory	NA
21	Existence of step up or other incentive to redeem	NA
22	Noncumulative or cumulative	NA
23	Convertible or non-convertible	NA
24	If convertible, conversion trigger(s)	NA
25	If convertible, fully or partially	NA
26	If convertible, conversion rate	NA
27	If convertible, mandatory or optional conversion	NA
28	If convertible, specify instrument type convertible into	NA
29	If convertible, specify issuer of instrument it converts into	NA
30	Write-down feature	NA
31	If write-down, write-down trigger(s)	NA
32	If write-down, full or partial	NA
33	If write-down, permanent or temporary	NA
34	If temporary write-down, description of write-up mechanism	NA
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	NA
36	Non-compliant transitioned features	NA
37	If yes, specify non-compliant features	NA