



PILLAR III DISCLOSURES

FOR QUARTER ENDED 31 MARCH 2020



Bank Gaborone
a member of Capricorn Group

PILLAR III DISCLOSURES

FOR QUARTER ENDED 31 MARCH 2020



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Basel II Common Equity Tier I Disclosure

1. BACKGROUND AND SCOPE

The Bank of Botswana Directive on Revised International Convergence of Capital Measurement and Capital Standards for Botswana (Basel II Guidelines) (hereinafter referred to as “the Standards”) read in conjunction with Sections 13, 18 and 48 of the Banking Act (CAP 46:04) effective 1st January 2016, outlines the need for banks to have a Pillar III disclosure (Market Discipline).

Section 12.1 and 12.2 of the directive stipulate the objectives of this disclosure as shown below;

- *The Primary purpose of Pillar III is to supplement the minimum capital requirements (Pillar II) by introducing a set of disclosure requirements, which allow market participants to influence the level of capital, risk assessment processes, capital adequacy and remuneration practices of a bank.*
- *Improved transparency, underpinned by high quality and timely market disclosures, will enhance market discipline, efficiency and confidence. The key objective is, therefore, to provide a market driven incentive for a bank to conduct business in a safe and sound manner. A bank is, therefore, responsible, beyond the disclosure requirements set out in this Directive, for Conveying adequate information regarding its actual risk profile and how these risks relate to capital.*

1.1 SUMMARY AND APPROACH

The Bank Gaborone Pillar III report will focus on disclosures for the period ended 31st March 2020 and is therefore not the detailed year-end report. It, however, adequately covers the disclosure requirements as stated in the Basel II guidelines to ensure market participants have sufficient information to effectively assess key information relating to the bank’s regulatory capital and risk exposures.

2. REGULATORY CAPITAL STRUCTURE

Bank of Botswana requires each bank to hold the minimum level of the regulatory capital of P5 million, as well as to maintain the following capital adequacy ratios:

- Tier 1 and Tier 2 capital to risk weighted assets at a minimum of 15%, referred to as capital adequacy ratio.
- Tier 2 capital to Tier 1 capital limited at a ratio of 50% in the determination of capital adequacy.

The bank’s regulatory (qualifying) capital is divided into two tiers:

- Tier 1 capital: stated capital and distributable reserves;
- Tier 2 capital: qualifying subordinated loan capital, collective impairment allowances and unrealized gains arising on the fair valuation of equity instruments held as available for sale.

The bank has adopted the standardized approach to Basel II effective from 1st January 2016, with risk-weighted assets being measured at three different risk classes: operational risk, market risk and credit risk. A summary of the bank’s capital elements, as well as the various risk weighted assets are briefly discussed in the following sections of this report.

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3. BASEL II COMMON EQUITY TIER I DISCLOSURE TEMPLATE (WITH TRANSITIONAL ADJUSTMENTS) (TABLE 22)

No	Common Equity Tier I capital: Instruments and Reserves	P'000
1	Directly issued qualifying common share (and equivalent for nonjoint stock companies) capital plus related stock surplus.	233,800
2	Retained earnings	186,047
3	Accumulated other comprehensive income (and other reserves)	-
4	<i>Directly issued capital subject to phase out from CET1 CAPITAL (only applicable to non-joint stock companies)</i>	-
5	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1 CAPITAL)	-
6	Common Equity Tier I capital before regulatory adjustments	419,847
	Common Equity Tier I capital: Regulatory Adjustments	
7	Prudential valuation adjustments	-
8	Goodwill (net of related tax liability)	-
9	Other intangibles other than mortgage-servicing rights (net of related tax liability)	(4,835)
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	Gains and losses due to changes in own credit risk on fair valued liabilities	-
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 cross-holdings 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)	-
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	-

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25	of which: deferred tax assets arising from temporary differences	-
26	National specific regulatory adjustments	-
27	Regulatory adjustments applied to Common Equity Tier I due to insufficient Additional Tier I and Tier II to cover deductions	-
28	Total regulatory adjustments to Common equity Tier I	(4,835)
28 (a)	IFRS 9 Provisions Transitional Adjustments	(19,996)
	a. Transitional Adjustment Amount Added Back to CET1	9,998
29	Common Equity Tier I capital (CET1 CAPITAL)	405,014
	Additional Tier I Capital: Instruments	
30	Directly issued qualifying Additional Tier I 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	<i>Directly issued capital instruments subject to phase out from Additional Tier I</i>	-
34	Additional Tier I instruments (and CET1 CAPITAL instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group AT1)	-
35	<i>of which: instruments issued by subsidiaries subject to phase out</i>	-
36	Additional Tier I capital before regulatory adjustments	-
	Additional Tier I Capital: Regulatory Adjustments	
37	Investments in own Additional Tier I instruments	-
38	Reciprocal cross-holdings in Additional Tier I 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)	-
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	-
42	Regulatory adjustments applied to Additional Tier I due to insufficient Tier II to cover deductions	-
43	Total regulatory adjustments to Additional Tier I capital	-
44	Additional Tier I capital (AT1)	-
45	Tier I capital (T1 = CET1 CAPITAL + AT1)	405,014
	Tier II Capital: Instruments and Provisions	
46	Directly issued qualifying Tier II instruments plus related stock surplus	216,000
47	<i>Directly issued capital instruments subject to phase out from Tier II</i>	-
48	Tier II instruments (and CET1 CAPITAL and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier II)	-
49	<i>of which: instruments issued by subsidiaries subject to phase out</i>	-
50	Unpublished profits	41,772
51	Provisions	42,361
52	Tier II capital before regulatory adjustments	300,133

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Tier II Capital: Regulatory Adjustments		-
53	Investments in own Tier II instruments	-
54	Reciprocal cross-holdings in Tier II instruments	-
55	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).	-
56	Significant investments in the capital banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions).	-
57	National specific regulatory adjustments	-
58	Total regulatory adjustments to Tier II capital	-
57	Tier II capital (T2)	300,133
60	Total capital (TC = T1 + T2)	705,147
61	Total risk-weighted assets	4,567,912
Capital Ratios and Buffers		
62	Common Equity Tier I (as a percentage of risk weighted assets)	8.9%
63	<i>Tier I (as a percentage of risk-weighted assets)</i>	8.9%
64	<i>Total capital (as a percentage of risk weighted assets)</i>	15.4%
65	<i>Institution specific buffer requirement (minimum CET1 CAPITAL requirement plus capital conservation buffer plus countercyclical buffer requirements plus G-SIB buffer requirement, expressed as a percentage of risk weighted assets)</i>	-
66	<i>of which: capital conservation buffer requirement</i>	2.5%
67	<i>of which: bank specific countercyclical buffer requirement</i>	-
68	<i>of which: G-SIB buffer requirement</i>	-
69		
<i>Common Equity Tier I available to meet buffers (as a percentage of risk weighted assets)</i>		
70	<i>National Common Equity Tier I minimum ratio (if different from Basel III minimum)</i>	4.5%
71	<i>National Tier I minimum ratio (if different from Basel III minimum)</i>	4.5%
72	<i>National total capital minimum ratio (if different from Basel III minimum)</i>	15.0%
<i>Amounts below the thresholds for deduction (before risk weighting)</i>		
73	<i>Non-significant investments in the capital of other financials</i>	-
74	<i>Significant investments in the common stock of financials</i>	-
75	<i>Mortgage servicing rights (net of related tax liability)</i>	-
76	<i>Deferred tax assets arising from temporary differences (net of related tax liability)</i>	762

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<i>Applicable caps on the inclusion of provisions in Tier II</i>		
77	<i>Provisions eligible for inclusion in Tier II in respect of exposures subject to standardized approach (prior to application of cap)</i>	42,361
78	<i>Cap on inclusion of provisions in Tier II under standardized approach</i>	42,361
79	<i>Provisions eligible for inclusion in Tier II in respect of exposures subject to internal ratings-based approach (prior to application of cap)</i>	-
80	<i>Cap for inclusion of provisions in Tier II under internal ratings-based approach</i>	-
<i>Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2015 and 1 Jan 2020)</i>		
81	<i>Current cap on CET1 CAPITAL instruments subject to phase out arrangements</i>	-
82	<i>Amount excluded from CET1 CAPITAL due to cap (excess over cap after redemptions and maturities)</i>	-
83	<i>Current cap on AT1 instruments subject to phase out arrangements</i>	-
84	<i>Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)</i>	-
85	<i>Current cap on T2 instruments subject to phase out arrangements</i>	-
86	<i>Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)</i>	-

TABLE 22 (C): TRANSITIONAL DISCLOSURES

		a	b	c	d	e
		March '20	Dec '19	Sep '19	June '19	March '19
	Available Capital (P'000)					
1	Common Equity Tier 1 (CET1)	419,847	416,047	372,216	372,216	375,966
1a	Fully loaded ECL accounting model	405,014	400,596	356,270	358,971	364,362
2	Tier 1	419,847	416,047	372,216	372,216	375,966
2a	Fully loaded ECL accounting model Tier 1	405,014	400,596	356,270	358,971	364,362
3	Total capital	719,980	710,242	694,728	629,705	623,614
3a	Fully loaded ECL accounting model total capital	705,147	694,791	678,782	616,460	612,010
Risk Weighted Asset (P'000)						
4	Total risk-weighted assets (RWA)	4,567,912	4,421,348	4,277,463	3,967,565	3,837,064
Risk based capital ratios as a percentage of RWA (%)						
5	Common Equity Tier 1 ratio	9.19%	9.40%	8.70%	9.38%	9.79%
5a	Fully loaded ECL accounting model Common Equity Tier 1	8.86%	9.06%	8.32%	9.04%	9.49%
6	Tier 1 ratio	9.19%	9.40%	8.70%	9.38%	9.79%
6a	Fully loaded ECL accounting model Common Equity Tier 1	8.86%	9.06%	8.32%	9.04%	9.49%

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		a	b	c	d	e
		March'20	Dec'19	Sep'19	June'19	March'19
Risk based capital ratios as a percentage of RWA (%)						
7	Total capital ratio	15.75 %	16.06 %	16.24 %	15.87 %	16.25 %
7a	Fully loaded ECL accounting model total capital ratio	15.44 %	15.71 %	15.86 %	15.53 %	15.94 %
Additional CET1 buffer requirements as a percentage of RWA						
8	Capital conservation buffer requirements (2.5% from 2019) (%)	-	-	-	-	-
9	Countercyclical requirement (%)	-	-	-	-	-
10	Bank G-SIB and/or D-SIB additional requirements (%)	-	-	-	-	-
11	Total of bank CET1 specific buffer requirements (%) (row 8 + row 9 + row 10)	-	-	-	-	-
12	CET1 available after meeting the bank's minimum capital requirement (P'000)	-	-	-	-	-

3.1 QUALITATIVE DISCLOSURES: CAPITAL RATIOS

For the Quarter Ended 31st March 2020, the bank's key capital ratios were above the minimum regulatory ratios. The ratios were as follows;

Capital	Minimum Prudential Ratio (Regulatory)	Reported Ratio
Common Equity Tier 1 Capital (CET 1)	4.5%	8.9%
Tier 1	7.5%	8.9%
Total Unimpaired Capital (CAR)	15%	15.44%

3.2 QUANTITATIVE DISCLOSURES

Below is the breakdown of the bank's Risk Weighted Assets (RWA), followed by a detailed breakdown of the risk classes

Risk Class	Methodology Used	Amount (P'000)
Credit Risk	Simple Approach	4,345,465
Market Risk	Standardized Measurement Approach	8,067
Operational Risk	Basic Indicator Approach	214,381
TOTAL RWA		4,567,912

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4. CREDIT RISK MANAGEMENT

Capital Requirements Credit Risk (RWA)

Credit risk is expressed as the risk that a borrower or counterparty will fail to meet an obligation when it falls due, and is inherent to the bank's business activities. The realization of credit risk can cause a considerable loss in revenue as well as a decline in the total asset value when assets are categorized as non-performing.

Bank Gaborone uses the Simple approach as per Basel II guidelines when calculating the Credit Risk RWA. The RWA is the addition of the totals of both on-balance sheet and off-balance sheet portfolios, subject to various mitigations.

Risk-Weighted Amounts (OnBalance Sheet Exposure)	Total Risk Weighted Assets	Minimum Capital Requirement
Claims on Sovereign or Central banks	-	-
Claims on Banks	306,288	45,943
Unrated security firms	17,866	2,680
Claims on Corporates	1,598,609	239,791
Claims Included in the Retail Portfolios	819,444	122,917
Claims Secured by Residential Mortgage Property	342,713	51,407
Claims Secured by Commercial Real Estate	1,165,765	174,865
Other Assets	62,402	9,360
Total On-Balance Sheet Amount	4,313,087	646,963
RISK WEIGHTED AMOUNTS (OFF BALANCE SHEET EXPOSURES)		
Commitments that are unconditionally cancellable at any time without prior-notice or that effectively provide for automatic cancellation due to a deterioration in a borrower's credit worthiness.	-	-
Corporates	32,378	4,857
TOTAL OFF-BALANCE SHEET AMOUNT	32,378	4,857
TOTAL RISK WEIGHTED ASSETS	4,345,465	651,820

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5. MARKET RISK

Capital Requirements Market Risk (RWA)

Market risk is the exposure to adverse changes in the price or value of an instrument traded or held as an investment. Where market risk is a factor, and especially in volatile markets, the practice of marking to market on a regular basis is an important discipline.

From the above the following detailed risks arise:

- Interest rate risk: the risk of loss resulting from changes in interest rates, including changes in the shape of yield curves.
- Currency risk: also known as foreign exchange risk, which arises from fluctuations within the currency market.
- Basis risk: the change in price basis or spread between two rates or indices changes, e.g. the price of an asset does not change in the same manner as a change in a liability, or the spread between the funding and lending rate changes

Bank Gaborone uses the Standardized Measurement Method (SMM) where a standardized supervisory capital charge is applied separately to each risk category and aggregated to derive the market risk capital charge.

Risk Category	RWA	Minimum Capital Requirement
Market Risk RWA	8,067	1,210

6. OPERATIONAL RISK

Capital Requirements Operational Risk (RWA)

Operational Risk is the risk of the bank suffering financial losses directly or indirectly due to failed internal processes or systems, human error or from external events.

Bank Gaborone adopted the Basic Indicator Approach (BIA) when calculating its operational RWA. The regulatory charge for operational risk will be equal to 15 percent of the average of the previous three years bank's positive annual gross income. The three- year average gross income is calculated on the basis of the last three 12 monthly observations at the end of the financial year. When audited figures are not available, the submitted returns may be used.

Risk Category	RWA	Minimum Capital Requirement
Operational Risk RWA	214,381	32,157

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7. BALANCE SHEET ACCOUNTING (IFRS) VS REGULATORY

There are no differences in our IFRS and Regulatory reporting figures. The only difference is due to the way Impairment is reported in our IFRS and Basel II Return.

	As at period end 31 March 2020 (IFRS)	As at period end 31 March 2020 (Regulatory)
Assets		
Cash and balances at central banks	301,795	301,795
Items in the course of collection from other banks	299,715	299,715
Trading portfolio assets	-	-
Financial assets designated at fair value	-	-
Derivative financial instruments	-	-
Loans and advances to banks	612,377	612,377
Loans and advances to customers	4,576,981	4,712,272
Reverse repurchase agreements and other similar secured lending	146,335	146,335
Available for sale financial investments	-	-
Current and deferred tax assets	-	-
Prepayments, accrued income and other assets	19,029	19,029
Investments in associates and joint ventures	4,023	4,023
Goodwill and intangible assets	-	-
of which goodwill	-	-
of which other intangibles (excluding MSRs)	11,828	11,828
of which MSRs	-	-
Property, plant and equipment	49,081	49,081
Total Assets	6,021,164	6,156,454
Liabilities		
Deposits from banks	-	-
Items in the course of collection due to other banks	-	-
Customer accounts	5,239,316	5,239,316
Repurchase agreements and other similar secured borrowing	-	-
Trading portfolio liabilities	-	-
Financial liabilities designated at fair value	-	-
Derivative financial instruments	-	-
Debt securities in issue	266,000	266,000
Accruals, deferred income and other liabilities	59,636	59,636
Current and deferred tax liabilities	-	-
Of which DTLs related to goodwill	-	-
Of which DTLs related to intangible assets (excluding MSRs)	-	-
Of which DTLs related to MSRs	-	-

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Subordinated liabilities	-	-
Provisions	14,247	14,247
Retirement benefit liabilities	-	-
Total liabilities	5,579,199	5,579,199
Shareholders' Equity		
Paid-in share capital	-	-
of which amount eligible for CET1 CAPITAL	233,800	233,800
of which amount eligible for AT1	-	-
Retained earnings	208,165	343,456
Accumulated other comprehensive income	-	-
Total shareholders' equity	441,964	577,256
Total Liabilities & shareholders' equity	6,021,164	6,156,455

Table 26: Expanded Regulatory Balance Sheet

	As at period end 31 March 2020 (IFRS)	As at period end 31 March 2020 (Regulatory)	Reference
Assets			
Cash and balances at central banks	301,795	301,795	
Items in the course of collection from other banks	299,715	299,715	
Trading portfolio assets	-	-	
Financial assets designated at fair value	-	-	
Derivative financial instruments	-	-	
Loans and advances to banks	612,377	612,377	
Loans and advances to customers	4,576,981	4,712,272	
Reverse repurchase agreements and other similar secured lending	146,335	146,335	
Available for sale financial investments	-	-	
Current and deferred tax assets	-	-	
Prepayments, accrued income and other assets	19,029	19,029	
Investments in associates and joint ventures	4,023	4,023	

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	As at period end 31 March 2020 (IFRS)	As at period end 31 March 2020 (Regulatory)	Reference
Goodwill and intangible assets	11,828	11,828	
of which goodwill	-	-	A
of which other intangibles (excluding MSRs)	11,828	11,828	B
of which MSRs	-	-	C
Property, plant and equipment	49,081	49,081	
Total Assets	6,021,164	6,156,455	
Liabilities			
Deposits from banks	-	-	
Items in the course of collection due to other banks	-	-	
Customer accounts	5,239,316	5,239,316	
Repurchase agreements and other similar secured borrowing	-	-	
Trading portfolio liabilities	-	-	
Financial liabilities designated at fair value	-	-	
Derivative financial instruments	-	-	
Debt securities in issue	266,000	266,000	
Accruals, deferred income and other liabilities	59,636	59,636	
Current and deferred tax liabilities	-	-	
Of which DTLs related to goodwill	-	-	D
Of which DTLs related to intangible assets (excluding MSRs)	-	-	E F
Of which DTLs related to MSRs	-	-	
Subordinated liabilities	-	-	
Provisions	14,247	14,247	
Retirement benefit liabilities	-	-	
Total liabilities	5,579,199	5,579,199	
Shareholders' Equity			
Paid-in share capital	233,800	233,800	
of which amount eligible for CET1 CAPITAL	233,800	233,800	H
of which amount eligible for AT1	-	-	I
Retained earnings	166,393	301,684	
Accumulated other comprehensive income	41,772	41,772	
Total shareholders' equity	441,965	577,256	
Total Liabilities & shareholders' equity	6,021,164	6,156,455	

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Table 27: Extract of Basel III common disclosure template

Common Equity Tier I capital: instruments and reserves			
		Component of regulatory capital reported	Source based on Reference numbers
1	Directly issued qualifying common share (and equivalent for non-joint stock companies) capital plus related stock surplus.	233,800	H
2	Retained Earnings	301,684	
3	Accumulated other comprehensive income (and other reserves)	41,772	
4	Directly issued capital subject to phase out from CET1 CAPITAL (only applicable to non- joint stock companies)	-	
5	Common share capital issued by subsidiaries and held by third parties (amount) allowed in group CET1 CAPITAL)	-	
6	Common Equity Tier I capital before regulatory adjustments	577,256	
7	Prudential valuation adjustments	-	
8	Goodwill (net of related tax liability)	11,828	A-D

Table 28: Main features of regulatory capital instruments

	Pref Share	Pref Share	BG 001	BG 002	BG 003
Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	n/a	n/a	n/a	n/a	n/a
Governing law(s) of the instrument	Botswana	Botswana	Botswana	Botswana	Botswana
Regulatory treatment					
Transitional Basel III rules	[Tier II]	[Tier II]	Disqualified	[Tier II]	[Tier II]
Post-transitional Basel III rules	[Tier II]	[Tier II]	[Deduction from Tier II]	[Tier II]	[Tier II]
Eligible at solo/group/group and solo	Solo	Solo	Solo	Solo	Solo
Instrument type (types to be specified by each jurisdiction)	Preference Shares	Preference Shares	Subordinated Term Debt	Subordinated Term Debt	Subordinated Term Debt
Amount recognized in regulatory capital (Currency in mil, as of most recent reporting date)	50,000	100,000	0	25,000	41,000
Par value of instrument	50,000	100,000	50,000	25,000	41,000
Accounting classification	Preference Shares	Preference Shares	Debt	Debt	Debt

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	Pref Share	Pref Share	BG 001	BG 002	BG 003
Original date of issuance	16/09/2019	26/10/2019	27/10/2011	30/06/2017	30/06/2018
Perpetual or dated	Dated	Dated	Dated	Dated	Dated
Original maturity date	15/09/2029	25/10/2029	31/10/2021	30/06/2027	30/06/2028
Issuer call subject to prior supervisory approval	Yes	Yes	Yes	Yes	Yes
Optional call date, contingent call dates and redemption amount	5 year anniversary or after	5 year anniversary or after	5 year anniversary or after	5 year anniversary or after	5 year anniversary or after
Subsequent call dates, if applicable	5 year anniversary or after at the option of issuer	5 year anniversary or after at the option of issuer	5 year anniversary or after at the option of issuer	5 year anniversary or after at the option of issuer	5 year anniversary or after at the option of issuer
Coupons / dividends	Dividends	Dividends	Coupon	Coupon	Coupon
Fixed or floating dividend/coupon	Floating	Floating	Floating	Floating	Floating
Coupon rate and any related index	Bank Rate +16%	Bank Rate +1.4%	91 Day BOBC Rate +4%	Bank Rate +2.25%	Bank Rate +2.25%
Existence of a dividend stopper	None	None	None	None	None
Fully discretionary, partially discretionary or mandatory	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
Existence of step up or other incentive to redeem	None	None	None	None	None
Noncumulative or cumulative	Cumulative	Cumulative	Cumulative	Cumulative	Cumulative
Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible	Non-convertible
If convertible, conversion trigger (s)	n/a	n/a	n/a	n/a	n/a
If convertible, fully or partially	n/a	n/a	n/a	n/a	n/a
If convertible, conversion rate	n/a	n/a	n/a	n/a	n/a
If convertible, mandatory or optional conversion	n/a	n/a	n/a	n/a	n/a
If convertible, specify instrument type convertible into	n/a	n/a	n/a	n/a	n/a
If convertible, specify issuer of instrument it converts into	n/a	n/a	n/a	n/a	n/a
Write-down feature	n/a	n/a	n/a	n/a	n/a

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	Pref Share	Pref Share	BG 001	BG 002	BG 003
If write-down, write-down trigger(s)	n/a	n/a	n/a	n/a	n/a
If write-down, full or partial	n/a	n/a	n/a	n/a	n/a
If write-down, permanent or temporary	n/a	n/a	n/a	n/a	n/a
If temporary write-down, description of write-up mechanism	n/a	n/a	n/a	n/a	n/a
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Subordinated Debt	Subordinated Debt	Depositors and General Creditors	Depositors and General Creditors	Depositors and General Creditors
Non-compliant transitioned features	n/a	n/a	Yes	n/a	n/a
If yes, specify non-compliant features	n/a	n/a	Call option on the bond	n/a	n/a