



Pillar III Disclosure

For Quarter Ended 31 December 2022



Bank Gaborone

a member of **Capricorn Group**

Pillar III Disclosure

For Quarter Ended 31 December 2022



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Basel III 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 stipulates 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 December 2022 and is therefore not the detailed year-end report. This, 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. Revised Bank Regulatory Capital Structure

The Directive on Revised International Convergence of Capital Measurement and Capital Standards for Botswana amended some of the regulatory capital thresholds on 1st April 2020 as a form of capital relief to banks. The initiative was also to provide additional liquidity support measures to enable banks to address the liquidity challenges during these extra ordinary times and to continue to support economic activity in the context of the adverse impact of the coronavirus (Covid-19) pandemic. *Source: Bank Of Botswana Circular No.2 to Banks.*

Each Bank is now required to hold the minimum level of the regulatory capital of P5 million, as well as to maintain the following capital adequacy ratios:

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- Tier 1 and Tier 2 capital to risk weighted assets at a minimum of 12.5 % (previously set as 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 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 non-joint stock companies) capital plus related stock surplus.	233,750
2	Retained earnings	331,490
3	Accumulated other comprehensive income (and other reserves)	-
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	565,240
	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)	(4,700)
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	-
25	of which: deferred tax assets arising from temporary differences	-
26	National specific regulatory adjustments	-

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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	(4,700)
28 (a)	IFRS 9 Provisions Transitional Adjustments	(19,970)
	a. Transitional Adjustment Amount Added Back to CET1	-
29	Common Equity Tier I capital (CET1 CAPITAL)	540,570
	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	Directly issued capital instruments subject to phase out from Additional Tier 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	of which: instruments issued by subsidiaries subject to phase out	-
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)	540,570
	Tier II capital: instruments and provisions	
46	Directly issued qualifying Tier II instruments plus related stock surplus	241,000
47	Directly issued capital instruments subject to phase out from Tier II	20,000
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	of which: instruments issued by subsidiaries subject to phase out	-
50	Unpublished profits	36,463
51	Provisions	65,285
52	Tier II capital before regulatory adjustments	362,748
	Tier II capital: regulatory adjustments	
53	Investments in own Tier II instruments	-
54	Reciprocal cross-holdings in Tier II instruments	-

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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	-
59	Tier II capital (T2)	362,748
60	Total capital (TC = T1 + T2)	903,318
61	Total risk-weighted assets	5,975,266
Capital ratios and buffers		
62	Common Equity Tier I (as a percentage of risk weighted assets)	9.05 %
63	<i>Tier I (as a percentage of risk-weighted assets)</i>	9.05 %
64	<i>Total capital (as a percentage of risk weighted assets)</i>	15.12 %
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		
Common Equity Tier I available to meet buffers (as a percentage of risk weighted assets)		
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>	12.5 %
Amounts below the thresholds for deduction (before risk-weighting)		
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>	-
Applicable caps on the inclusion of provisions in Tier II		
77	<i>Provisions eligible for inclusion in Tier II in respect of exposures subject to standardized approach (prior to application of cap)</i>	63,418
78	<i>Cap on inclusion of provisions in Tier II under standardized approach</i>	65,285
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>	-

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	<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
		Dec'22	Sept'22	June'22	March'22	Dec'22
	Available Capital (P'000)					
1	Common Equity Tier 1 (CET1)	565,240	508,064	508,064	508,064	508,064
1a	Fully loaded ECL accounting model	540,570	482,900	482,406	484,407	484,469
2	Tier 1	565,240	508,064	508,064	508,064	508,064
2a	Fully loaded ECL accounting model Tier 1	540,570	482,900	482,406	484,407	484,469
3	Total capital	927,988	916,452	898,507	881,241	869,952
3a	Fully loaded ECL accounting model total capital	903,318	891,288	872,849	857,584	846,357
	Risk Weighted Asset (P'000)					
4	Total risk-weighted assets (RWA)	5,975,266	5,965,251	5,528,053	5,688,224	5,555,032
	Risk based capital ratios as a percentage of RWA (%)					
5	Common Equity Tier 1 ratio	9.46 %	8.52 %	9.19 %	8.93 %	9.15 %
5a	Fully loaded ECL accounting model Common Equity Tier 1	9.05 %	8.10 %	8.73 %	8.52 %	8.72 %
6	Tier 1 ratio	9.46 %	8.52 %	9.19 %	8.93 %	9.15 %
6a	Fully loaded ECL accounting model Common Equity Tier 1	9.05 %	8.10 %	8.73 %	8.52 %	8.72 %
7	Total capital ratio	15.53 %	15.36 %	16.25 %	15.49 %	15.66 %
7a	Fully loaded ECL accounting model total capital ratio	15.12 %	14.94 %	15.79 %	15.08 %	15.24 %

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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 December 2022, 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 %	9.05 %
Tier 1	7.5 %	9.05 %
Total Unimpaired Capital (CAR)	12.5 %	15.12 %

3.2 Quantitative Disclosures

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

Risk Class	Methodology Used	Amount (P'000)
Credit Risk	Credit RWA (Simple Approach)	5,656,082
Market Risk	Market RWA	23,188
Operational Risk	Operational RWA (BIA)	295,997
TOTAL RWA		5,975,266

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 and OFF balance sheet portfolios, subject to various mitigations.

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Risk-Weighted Amounts (On-Balance Sheet Exposures)	Total Risk Weighted Assets	Minimum Capital Requirement
Claims on Sovereign or Central banks	-	-
Claims on Banks	613,607	76,701
Unrated security firms	333,615	41,702
Claims on Corporates	1,959,015	244,877
Claims Included in the Retail Portfolios	1,152,105	144,013
Claims Secured by Residential Mortgage Property	335,395	41,924
Claims Secured by Commercial Real Estate	1,053,099	131,637
Other Assets	137,444	17,181
Total On-Balance Sheet Amount	5,584,279	698,035
Risk Weighted Amounts (Off Balancesheet 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	71,803	8,975
Total Off-Balance Sheet Amount	71,803	8,975
Total Risk Weighted Assets	5,656,082	707,010

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.

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Bank Gaborone uses the Standardized Measurement Method (SMM) where a standardized supervisory capital charged 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	23,188	2,898

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 12.5 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	295,997	37,000

7. Balance Sheet Accounting (IFRS) VS Regulatory

	As at period end 31 December 2022 (IFRS)	As at period end 31 December 2022 (Regulatory)	Difference
Assets			
Cash and balances at central banks	83,550	83,550	-
Items in the course of collection from other banks	499,732	499,732	-
Trading portfolio assets	-	-	-
Financial assets designated at fair value	-	-	-
Derivative financial instruments	-	-	-
Loans and advances to banks	861,221	861,221	-
Loans and advances to customers	5,237,678	5,237,678	-
Reverse repurchase agreements and other similar secured lending	148,085	148,085	-
Available for sale financial investments	-	-	-
Current and deferred tax assets	3,310	3,310	-

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Prepayments, accrued income and other assets	377,458	377,458	-
Investments in associates and joint ventures	10,606	10,606	-
Goodwill and intangible assets	-	-	-
of which goodwill	-	-	-
of which other intangibles (excluding MSRs)	4,700	4,700	-
of which MSRs	-	-	-
Property, plant and equipment	98,750	98,750	-
Total Assets	7,325,089	7,325,089	-
Liabilities			
Deposits from banks	-	-	-
Items in the course of collection due to other banks	-	-	-
Customer accounts	6,243,689	6,243,689	-
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	107,137	107,137	-
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	-	-	-
Subordinated liabilities	63,881	63,881	-
Provisions	58,456	58,456	-
Retirement benefit liabilities	4,239	4,239	-
Total liabilities	6,743,401	6,743,401	-
Shareholders' Equity			
Paid-in share capital	233,750	233,750	-
of which amount eligible for CET1 CAPITAL	233,750	233,750	-
of which amount eligible for AT1	-	-	-
Retained earnings	311,475	311,475	-
Accumulated other comprehensive income	36,463	36,463	-
Total shareholders' equity	581,688	581,688	-
Total Liabilities & shareholders' equity	7,325,089	7,325,089	-

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Table 26 Expanded Regulatory Balance Sheet

	As at period end 31 December 2022 (IFRS)	As at period end 31 December 2022 (Regulatory)	Reference
Assets			
Cash and balances at central banks	83,550	83,550	
Items in the course of collection from other banks	499,732	499,732	
Trading portfolio assets	-	-	
Financial assets designated at fair value	-	-	
Derivative financial instruments	-	-	
Loans and advances to banks	861,221	861,221	
Loans and advances to customers	5,237,678	5,237,678	
Reverse repurchase agreements and other similar secured lending	148,085	148,085	
Available for sale financial investments	-	-	
Current and deferred tax assets	3,310	3,310	
Prepayments, accrued income and other assets	377,458	377,458	
Investments in associates and joint ventures	10,606	10,606	
Goodwill and intangible assets	-	-	
of which goodwill	-	-	A
of which other intangibles (excluding MSRs)	4,700	4,700	B
of which MSRs	-	-	C
Property, plant and equipment	98,750	98,750	
Total Assets	7,325,089	7,325,089	
Liabilities			
Deposits from banks	-	-	
Items in the course of collection due to other banks	-	-	
Customer accounts	6,243,689	6,243,689	
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	107,137	107,137	
Current and deferred tax liabilities	-	-	

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Of which DTLs related to goodwill	-	-	D
Of which DTLs related to intangible assets (excluding MSRs)	-	-	E
Of which DTLs related to MSRs	-	-	F
Subordinated liabilities	63,881	63,881	
Provisions	58,456	58,456	
Retirement benefit liabilities	4,239	4,239	
Total liabilities	6,743,401	6,743,401	
Shareholders' Equity			
Paid-in share capital	233,750	233,750	
of which amount eligible for CET1 CAPITAL	233,750	233,750	H
of which amount eligible for AT1	-	-	I
Retained earnings	311,475	311,475	
Accumulated other comprehensive income	36,463	36,463	
Total shareholders' equity	581,688	581,688	
Total Liabilities & Shareholders' Equity	7,325,089	7,325,089	

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.	233,750	H
2	Retained Earnings	331,490	
3	Accumulated other comprehensive income (and other reserves)	-	
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	565,240	
7	Prudential valuation adjustments	-	
8	Goodwill (net of related tax liability)	4,700	A-D

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Table 28 Main features of regulatory capital instruments

	Pref Share	Pref Share	Pref Share	BG 002	BG 003
Unique identifier (Eg: 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	Tier II	Tier II	Tier II	Tier II	Tier II
Transitional Basel III rules	[Tier II]	[Tier II]	[Tier II]	[Tier II]	[Tier II]
Post-transitional Basel III rules	[Tier II]	[Tier II]	[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	Preference Shares	Subordinated Term Debt	Subordinated Term Debt
Amount recognized in regulatory capital (Currency in mil, as of most recent reporting date)	50,000	100,000	50,000	20,000	41,000
Par value of instrument	50,000	100,000	50,000	25,000	41,000
Accounting classification	Preference Shares	Preference Shares	Preference Shares	Debt	Debt
Original date of issuance	16/09/2019	26/10/2019	24/06/2020	30/06/2017	30/06/2018
Perpetual or dated	Dated	Dated	Dated	Dated	Dated
Original maturity date	15/09/2029	25/10/2029	23/06/2030	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	Dividends	Coupon	Coupon
Fixed or floating dividend/ coupon	Floating	Floating	Floating	Floating	Floating
Coupon rate and any related index	Bank Rate +1.6 %	Bank Rate +1.4 %	Bank Rate +1.4 %	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

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	Pref Share	Pref Share	Pref Share	BG 002	BG 003
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
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	Subordinated Debt	Depositors and General Creditors	Depositors and General Creditors
Non-compliant transitioned features	n/a	n/a	n/a	n/a	n/a
If yes, specify non-compliant features	n/a	n/a	n/a	n/a	n/a