



Bank Saderat Iran

United Arab Emirates

Market Discipline – (Disclosure)

(BASEL III, Pillar III Report)

Submitted to

Central Bank of the United Arab Emirates

Banking Supervision and Examination Department

Approved by

Regional Office in the UAE

Regional Manager

A handwritten signature in blue ink, appearing to be 'A. J. J.', is written below the title 'Regional Manager'.

Prepared by

Accounts Department

Concurred by

Risk Management Department

Date : October, 2019

Issue # : 10-2018

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2	Table (2)	Consolidated Capital structure
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INFORMATION ON SUBSIDIARIES AND SIGNIFICANT INVESTMENTS AS ON 31-Dec-2018

Basis of Consolidation¹ :

	Country of Incorporation	% Ownership	Description ²	Accounting Treatment ³	Surplus Capital ⁴	Capital Deficiencies ⁵	Total Interests ⁶
<i>Subsidiaries</i>							
<i>Significant investments</i>							

Restrictions on transfer of regulatory capital within the group:

1. Include an outline of differences in the basis of consolidation of subsidiaries for accounting and regulatory purposes.
2. A brief description of the entities within the group such as securities, insurance, other financial subsidiaries, commercial subsidiaries, significant minority equity investments in insurance, financial and commercial entities.
3. Report the accounting treatment as:
 - that are fully consolidated;
 - that are pro-rata consolidated;
 - that are given a deduction treatment;
 - those from which surplus capital is recognized, and
 - that are neither consolidated nor deducted (e.g. where the investment is risk weighted)
4. The aggregate amount of surplus capital of insurance subsidiaries (whether deducted or subjected to an alternative method) included in the capital of the consolidated group. Surplus capital in unconsolidated regulated subsidiaries is the difference between the amount of investment in those entities and their regulatory capital requirements.
5. The aggregate amount of capital deficiencies in all subsidiaries not included in the consolidation i.e. they are deducted.
6. The aggregate amounts (e.g. current book value) of the licensed bank's total interests in insurance entities, which are risk-weighted rather than deducted from capital or subjected to an alternate group-wide method, as well as, if different, the proportion of voting power in these entities. In addition, indicate the quantitative impact on regulatory capital of using this (it's required to method) versus using the deduction or alternate group wide method

CONSOLIDATED CAPITAL STRUCTURE UNDER BASEL III AS ON 31-Dec-2018

Table (2)
(AED 000's)

Details		Summary Note and References	Amount
Capital Base			864,723
1	Common Equity Tier 1 (CET1) Capital		790,480
1.1	Share Capital		2,100,000
1.2	Share premium account		-
1.3	Eligible Reserves		521,553
1.4	Retained Earnings / (-) Loss		(1,012,511)
1.5	Eligible amount of minority interest		-
1.6	Capital shortfall if any		-
	CET1 capital Before the regulatory adjustments and threshold deduction		1,609,042
1.7	Less: Regulatory deductions		818,562
1.8	Less: Threshold deductions		-
	Total CET1 capital after the regulatory adjustments and threshold deduction		790,480
	Total CET1 capital after transitional arrangement for deductions (CET1)		790,480
2	Additional Tier 1 (AT1) Capital		-
2.1	Eligible AT1 capital (After grandfathering)		-
2.2	Other AT1 Capital e.g. (Share premium, minority interest)		-
	Total AT1 capital		-
	Total AT1 capital after transitional arrangements (AT1)		-
3	Tier 2 (T2) Capital		74,243
3.1	Tier 2 Instruments e.g. subordinated loan (After grandfathering and/or amortization)		-
3.2	Other Tier 2 capital (including General Provisions, etc.) ¹		74,243
	Total T2 Capital		74,243
	Total T2 capital after transitional arrangements (T2)		74,243

¹ Impact of changes in fair value reserve should be factored here

CAPITAL ADEQUACY AS ON 31-Dec-2018

a) Qualitative Disclosures				
Refer [Annex 3A3B-1] on page # 4				
b) Quantitative Disclosures				AED 000's
Capital Requirements		RWA	Capital Charge	Capital Ratio (%)
1	Credit Risk - Standardized Approach	5,939,416	623,639	72.1%
2	Market Risk - Standardized Approach	7,586	797	0.1%
3	Operational Risk	545,026	57,228	6.6%
	a. Basic Indicator Approach	545,026	57,228	6.6%
	b. Standardized Approach/ASA	-	-	0.0%
	c. Advanced Measurement Approach	-	-	0.0%
	Total Capital requirements	6,492,028	681,663	78.8%
	Capital Ratio			
	a. Total for Top consolidated Group	2,001,504	210,158	24.3%
	b. Tier 1 ratio only for top consolidated Group	2,001,504	170,128	21.5%
	c. CET1 ratio only for top consolidated Group	2,001,504	140,105	17.7%

Annex 3A3B-1

"Include here a description of the approach taken by the bank to assess the adequacy of its capital to support current and future activities. For each separate risk area (e.g. credit, market, operational, banking book interest rate risk, equity) banks must describe their risk management objectives and policies as per Para 824 of Basel II"

Risk Management Strategy

Bank Saderat Iran - UAE 'the Bank' Risk Management function contributes to the Bank's success by promoting a disciplined risk culture and creating risk transparency. It also ensures that we adopt a prudent and intelligent approach to risk-taking that appropriately balances risk and return and optimizes the allocation of capital throughout the Bank to benefit shareholders and other stakeholders. A significant number of employees and considerable technological resources are focused on ensuring that the Bank remains a top in the field of risk management. Moreover, through its proactive risk management culture and the appropriate qualitative and quantitative tools, the Bank strives to minimize the potential for undesired risk exposures in its operations. The essential functions of risk management are to identify measure and more importantly monitor the profile of the bank.

Key Objectives of BSI, UAE Risk Management

Prudent risk-taking is an integral part of the Bank daily business. The most important objectives of the Bank risk management strategy are to protect the human resources strength, financial strength of our business and to safeguard our reputation. The Bank risk management framework is therefore founded on the following principles, which apply for all businesses and risk categories.

Protection of Human Resources strength

At the Bank, we carefully monitor, control, and measure risk to limit the impact of potentially adverse events on our human resources as a very important assets of our organization. It is essential for our risk appetite to be consistent with our human resources.

Protection of financial strength

At the Bank, we carefully monitor, control, and measure risk in order to limit the impact of potentially adverse events on our capital and income streams. It is essential for our risk appetite to be consistent with our financial resources.

Safeguarding of reputation

The value of our organization depends on our reputation. All of our employees are therefore committed to maintaining our good reputation.

Risk transparency

Risk transparency is essential in order to ensure that risks are well understood by senior management and at all levels, which can be balanced against business goals.

Management accountability

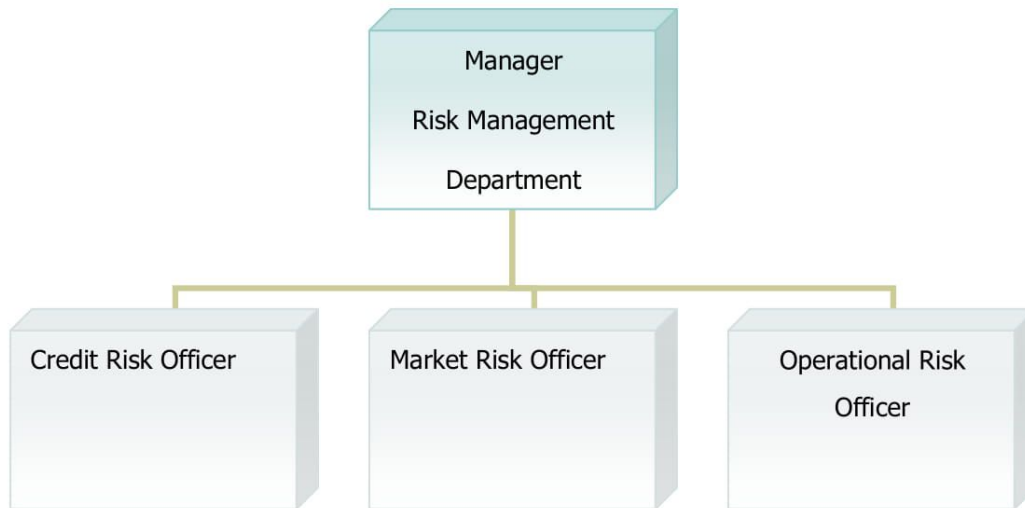
Our various businesses own the risks that are assumed in the execution of their operations. The leaders of our respective businesses are responsible for the

active management of risk exposures and for the return generated on the basis of the risks that were assumed.

Independent oversight

Risk management is a structured process that is used to identify measure, monitor, manage and report risk. The Risk Management functions operate independently of the front-office units to ensure the integrity of risk and control processes.

Bank Saderat Iran, UAE, Risk Management Department Organizational Structure

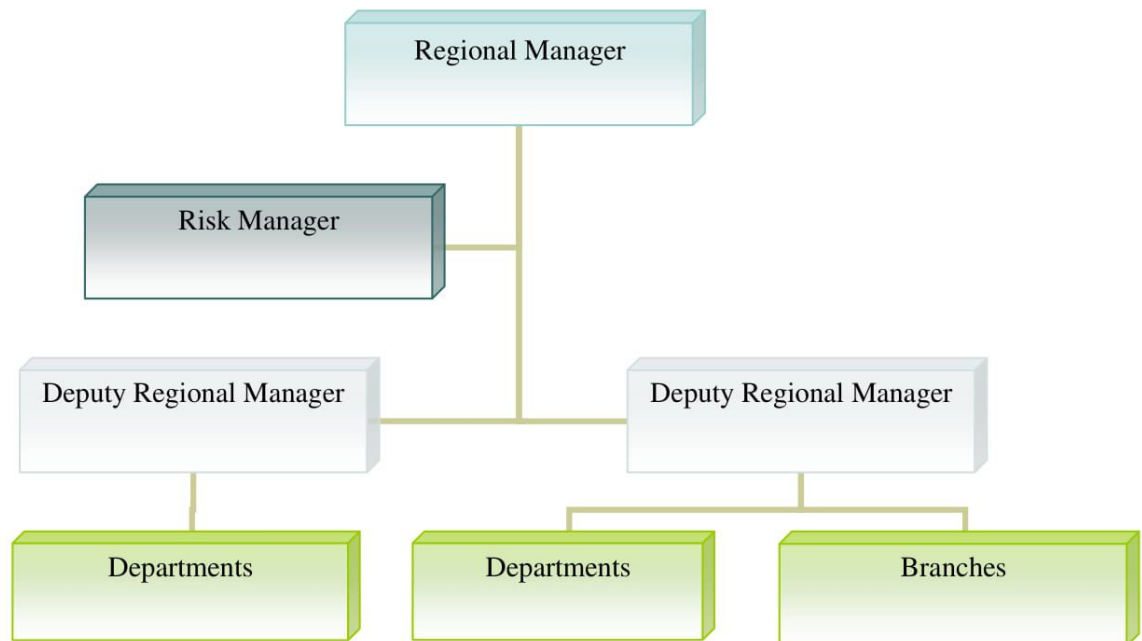


Reporting

Risk Manager is responsible to report to the Regional Manager

Risk Manager will receive variety types of reports from Branches and Departments for identifying risk related issues.

Reporting Structure



Computation of Capital Adequacy and its Approach

All the Banks in the UAE are required to keep a Minimum Capital Adequacy Ratio **12%** effective from June 2010 according to the CBUAE Circular No. 27/2009 dated 17 Nov 2009 for Pillar I of the Basel II capital accord, further As per CBUAE Circular No. 52/2017, total Capital, calculated as the sum of Tier 1 Capital and Tier 2 Capital, must be at least **10.5%** of RWA. Based on the analysis and upon conducting a stress test scenarios, the Risk Management Department proposed the Internal Capital Adequacy Ratio to be set at **13.30%**, accordingly on review and discussions the Top Management approved. Hence, the Internal Capital Adequacy Ratio of the Bank is set at **13.30%**, until unless subject to any material changes effecting the Capital, Balance Sheet or Risk Weighted Assets. The Bank has opted for Standardized approaches for Credit Risk and Market Risk and Basic Indicator of Operational Risk as per Basel II and National Discretion under Pillar I for the calculation of minimum capital Requirement, which covers most of the risk factors related to the Bank. The Bank relies on Basic methods of calculating minimum capital requirements in the assessment of individual risk types.

Risk Management Activity

The Bank has set up a strong risk management infrastructure supported by adoption of best practices in the field of risk management to manage and monitor the following major risks arising out of their day to day operations:

Credit Risk

Market Risk

Operational Risk

The Regional Manager has overall responsibility for the oversight of the risk management framework for the Bank. There are established detailed policies and procedures in this regard along with high powered senior management committees to ensure adherence to the approved policies and close monitoring of different risks within the operations of the Bank.

The Credit Committee, Assets and Liabilities Committee work under the mandate of the Regional Manager to set up risk limits and manage the overall risk. These Committees approve risk management policies of the Bank developed by Risk Management Department.

The Risk Management function is independent of the business. It is responsible to develop credit, market and operational risk policies. Risk Managers are delegated authority within the risk management framework to approve credit risk transactions. Risk Management Department also monitors Market and Operational risk.

Audit and Compliance is an independent department which is responsible to review the risk policies, risk exposures and the risk managing and monitoring frame work.

Treasury

The Treasury is responsible for managing the assets and liabilities of the Bank and its overall financial structure. It is also primarily responsible for the funding and liquidity, interest rate, and exchange rate fluctuation exposure risks of the Bank.

Internal Audit

Risk management processes throughout the Bank are audited annually by the Internal Audit function that examines both the adequacy of the procedures and the compliance by the Bank with these procedures. Internal Audit discusses the results of all assessments with management, and reports its findings and recommendations to the Regional Manager.

Risk measurement and reporting systems

Monitoring and controlling risks is primarily performed based on limits established by the Bank. These limits reflect their business strategy and market environment of the Banks as well as the level of risk that it is willing to accept, with additional emphasis on selected industries. In addition, the Bank monitors and measures the overall risk bearing capacity in relation to the aggregate risk exposure across all risk types and activities.

Information compiled from all businesses is examined and processed in order to analyze, control and identify early risks. This information is presented and explained to the Regional Manager, the Risk Committee, and the Head of each business division. The report includes aggregate credit exposure, hold limit exceptions, liquidity ratios and risk profile changes. On a monthly basis detailed reporting of industry, customer and geographic risks takes place. Relevant Committee assesses the appropriateness of the allowance for credit losses on a quarterly basis. The Regional Manager receives a comprehensive credit risk report once a quarter which is designed to provide all the necessary information to assess and conclude on the credit related risks of the Bank.

A briefing is given to the Assistant Regional Manager and all other relevant members of management of the Bank on the utilization of market limits, proprietary investments and liquidity, plus any other risk developments.

Risk Mitigation

As part of its overall risk management, the Bank uses derivatives and other instruments to manage exposures resulting from changes in interest rates, foreign currencies, equity risks, credit risks, and exposures arising from forecast transactions.

The Bank actively uses collaterals to reduce its credit risks.

Qualitative Disclosures

Definition of past due and impaired (for accounting purposes)		
Refer [Annex 4A-1] one page # 14		
Refer [Annex 4A-2] one page # 16		
Specific		
General		
Discussion of Bank's credit risk management policy		
Refer [Annex 4A-3] one page # 18		
Partial adoption of foundation IRB/advanced IRB Refer [Annex 4A-4] one page # 22		
Approach	Description of exposures	Plans and timing of migration to implement fully higher approach
Standardized Approach		
Foundation IRB		
Advanced IRB		

Annex 4A-1

"Definition of past due and impaired (for accounting purposes)"

Credit review procedures and loan classification

The Internal Audit Department subjects the risk assets of the Bank to an independent quality evaluation on a regular basis in conformity with the guidelines of the Central Bank of the UAE and internal policies in order to assist in the early identification of accrual and potential performance problems.

If a credit is overdue for 90 days or more, interest is suspended and is not credited to income. Specific allowance for impairment of classified assets is made based on recoverability of outstanding and risk ratings of the assets.

The Bank assesses the need for any impairment losses on its loan portfolio by calculating the net present value of the expected future cash flows for each loan or its recoverability base either on collateral value or the market value of the asset where such price is available.

Past due but not impaired loans

Loans and securities where contractual interest or principal payments are past due but the Bank believes that impairment is not appropriate on the basis of the level of security/collateral available and/or the stage of collection of amounts owed to the Bank, are classified as past due but not impaired loans.

Impaired loans and advances

Impaired loans and advances are loan and advances for which the Bank determines whether it is probable that it will be unable to collect all principal and interest due according to the contractual terms of the loan/advances agreement(s).

Annex 4A-2

"Description of approaches followed for specific and general allowances and statistical methods"

Specific Provision

The Bank establishes an allowance for impairment losses that represent its estimate of incurred losses in the loan portfolio. Specific allowances are made in respect of individually significant exposures where losses have been incurred. Management also assesses a need for collective impairment provisioning to cover for losses that they believe have been incurred but not yet been identified or reported.

The Bank reviews its problem loans and advances on a regular basis to assess whether a provision for impairment should be recorded in the income statement. In particular, judgment by management is required in the estimation of the amount and timing of future cash flows when determining the level of provisions required. Such estimates are necessarily based on assumptions about the probability of default and probable losses in the event of default, the value of the underlying security, and realization costs.

General Provision

In addition to specific provisions against individually significant loans and advances, the Bank also assesses the need for collectively. The collectively assessed allowances are made in respect of losses incurred in portfolios of loans with common features and where individual loan amounts are not significant.

The management of the Bank assesses, based on historical experience and the prevailing economic and credit conditions, the magnitude of loans which may be impaired but not identified as of the end of the reporting period.

These portfolio allowances are reassessed on a periodical basis and allowances are adjusted accordingly.

Annex 4A-3

"Discussion of Bank's credit risk management policy"

Credit Risk Management

The Regional Office has delegated responsibility for the management of credit risk to its Credit Committee and the Credit Risk Management Department. Their responsibilities include:

- Formulating credit policies in consultation with business units, covering collateral requirements, credit assessment, risk grading and reporting, documentary and legal procedures, and compliance with regulatory and statutory requirements.
- Establishing the authorization structure for the approval and renewal of credit facilities. Authorization limits are allocated to business unit Credit Officers. Larger facilities require approval by Head Office Credit Facilities Committee, Head of Credit Facilities or Regional Credit Facilities Committee.
- Reviewing and assessing credit risk. Credit Facility Department and Risk Management Department assess all credit exposures in excess of designated limits, prior to facilities being committed to customers by the business unit concerned. Renewal and reviews of facilities are subject to the same review process.
- Limiting concentrations of exposure to counterparties, geographies and industries (for loans and advances to customers), and by issuer, credit rating band, market liquidity and country (for investment securities).

- Developing and maintaining the Bank's risk grading in order to categories exposures according to the degree of risk of financial loss faced and to focus management on the attendant risks. The grading system is used in determining where impairment provisions may be required against specific credit exposures. The responsibility for setting risk grades lies with the final approving executive / committee as appropriate. Risk grades are subject to regular reviews by Credit facility Department, Branches and Risk Management Department.
- Reviewing compliance of business units with agreed exposure limits, including those for selected industries, country risk and product types. Regular reports are provided to the Regional Credit Facility Committee on the credit quality of local portfolios and appropriate corrective action is taken.
- Providing advice, guidance and specialist skills to business units to promote best practice throughout the Branches in the management of credit risk.

Policies relating to credit are reviewed and approved by the Regional Credit Facility Committee. All credit lines are approved centrally for the Bank in accordance with the credit policy set out in the Credit Policy Manual. In addition, whenever possible, loans are secured by acceptable forms of collateral in order to mitigate credit risk.

The Bank further limits risk through diversification of assets by geography and industry sectors.

All credit facilities are administered and monitored by the Credit Facility Department. Periodic reviews are conducted by the credit Officer and also by Credit facility Department.

Cross border exposure and financial institutions exposure limit for money market and treasury activities are approved as per guidelines established by the regional Credit Facility Committee and are monitored by the Risk Management Department.

Commercial/Institutional lending

All credit applications for commercial and institutional lending are subject to the Bank's regional credit policies and to regulatory requirements, as applicable from time to time.

All credit lines or facilities extended by the Bank are made subject to prior approval pursuant to a delegated signature authority system under the ultimate authority of the credit Facility Committee or the regional manager.

The management of the Bank has established country limits for cross border risk. Individual country limits are defined based on a detailed credit policy defining acceptable country credit risk exposure and evaluating and controlling cross border risk. These limits are regularly reviewed by the Bank's regional credit risk management and periodically by the Credit Facility Committee.

Retail lending

Each retail credit application is considered for approval according to a product program, which is devised in accordance with guidelines set out in the product policy approved by the regional Credit facility Committee. All approval authorities are delegated to the Credit facility Committee by the Regional Office. Different authority levels are specified for approving product programs and exceptions thereto, and individual loans/credits under product programs. Each product programs contains detailed credit criteria (such as salary multiplies, bank statement, age, residency, etc.) and regulatory, compliance and documentation requirements, as well as other operating requirements.

Annex 4A-4

"Partial adoption of foundation IRB/advanced IRB"

Standardized Approach

The Bank is calculating Capital Adequacy Ratio with Standardized Approach for Credit and Market Risk and Basic Indicator Approach for Operational Risk.

Credit Risk Exposure across all the Asset Class as on 31-12-2018 AED (000's)
5,939,416/-

Market Risk Exposure as on 31-12-2018 AED (000's) 7,586/-

Operational Risk Exposure as on 31-12-2018 AED (000's) 545,026/-

Foundation IRB

In accordance the CBUAE Circular No. 27/2009 dated 17-11-2009, the Bank has noted that the CBUAE expects the Banks in the UAE to migrate from Standardized Approach to Foundation IRB approach, in due course. The Bank does not have a plan for foundation IRB approach in immediate near future, any such decision shall be communicated to CBUAE once it is materialized.

Table 4(b)

GROSS CREDIT EXPOSURES BY CURRENCY TYPE AS ON 31-Dec-2018

(AED 000's)

	Loans	Debt Securities	Total Funded	Commitments	OTC Derivatives	Other Off-Balance Sheet exposures	Total Non-Funded	Total
Foreign Currency	589,903	-	589,903	-	-	86,533	65,481	655,384
AED	12,281,769	-	12,281,769	-	-	251,359	75,237	12,357,006
Total	12,871,672	-	12,871,672	-	-	337,892	140,718	13,012,390

Table 4(c)**GROSS CREDIT EXPOSURES BY GEOGRAPHY AS ON 31-Dec-2018**

(AED 000's)

GEOGRAPHIC DISTRIBUTION	Loans	Debt Securities	Total Funded	Commitments	OTC Derivatives	Other Off-Balance Sheet exposures	Total Non-Funded	Total
United Arab Emirates	12,573,222	-	12,573,222	-	-	118,428	118,428	12,691,650
GCC excluding UAE	-	-	-	-	-	21,416	21,416	21,416
Arab League (excluding GCC)	-	-	-	-	-	-	-	-
Asia	298,450	-	298,450	-	-	874	874	299,324
Africa	-	-	-	-	-	-	-	-
North America	-	-	-	-	-	-	-	-
South America	-	-	-	-	-	-	-	-
Caribbean	-	-	-	-	-	-	-	-
Europe	-	-	-	-	-	-	-	-
Australia	-	-	-	-	-	-	-	-
Others	-	-	-	-	-	-	-	-
Total	12,871,672	-	12,871,672	-	-	140,718	140,718	13,012,390

1. Concerning independent institutions insert the figures opposite the country that licensed them.
2. Concerning institutions that operate as branches for their H.O. insert the figures opposite the country where the H.O. are licensed.

Table 4(d)

GROSS CREDIT EXPOSURE BY INDUSTRY SEGMENT AS ON 31-Dec-2018

(AED 000's)

INDUSTRY SEGMENT	Loans	Debt Securities	Total Funded	Commitments	OTC Derivatives	Other Off-Balance Sheet exposures	Total Non-Funded	Total
Agriculture, Fishing & related activities ¹	-	-	-	-	-	51	51	51
Crude Oil, Gas, Mining & Quarrying ²	165,884	-	165,884	-	-	43	43	165,927
Manufacturing ³	570,337	-	570,337	-	-	30,495	30,495	600,832
Electricity & Water	10,835	-	10,835	-	-	33	33	10,868
Construction ⁴	414,475	-	414,475	-	-	24,281	24,281	438,756
Trade ⁵	10,117,951	-	10,117,951	-	-	55,717	55,717	10,173,668
Transport, Storage & Communication ⁶	10,655	-	10,655	-	-	2,321	2,321	12,976
Financial Institutions ⁷	114,861	-	114,861	-	-	10,542	10,542	125,403
Services ⁸	1,376,365	-	1,376,365	-	-	12,136	12,136	1,388,501
Government ⁹	-	-	-	-	-	-	-	-
Retail/Consumer banking ¹⁰	90,309	-	90,309	-	-	5,099	5,099	95,408
All Others	-	-	-	-	-	-	-	-
Total	12,871,672	-	12,871,672	-	-	140,718	140,718	13,012,390

1. Agriculture, Fishing and Allied Activities includes cultivation of crops, dairy and poultry farming, fishing & other activities (sheep rearing, etc).

2. Crude Oil, Gas, Mining and Quarrying include crude petroleum, natural gas and others.

3. Manufacturing includes food, tobacco, beverages, textile, leather, footwear, clothing, furniture, fixtures, other wood products, paper, paper products, printing presses, chemical, chemical products, petroleum refining, petrochemicals, basic metal products including aluminum, fabricated metal products, machinery, equipment, construction materials (brick tiles, etc.), cement, ship building, engineering works, saw mills, marble tiles and other manufacturing.

4. Construction includes construction of buildings, contractors and other construction.

5. Trade includes wholesale trade in construction materials, consumer durables, motor vehicles, non-durables and retail trade.

6. Transport and communication includes taxis, and other land transport, water transport, air transport, warehousing, storage and others.

7. Financial institutions include insurance companies, money and exchange dealers, NBFCs and other financial institutions.

8. Services include hotel and restaurants, professional services, repair work (repair of motor vehicles, a/cs, etc.), recreation services (cinemas, sports club, etc.) and other services.

9. Government includes federal government and local government.

10. Retail/consumer lending includes personal loan installments, residential mortgage loans, car loans, credit cards, other retail products, loans for investments in shares etc.

Table 4(e)**GROSS CREDIT EXPOSURES BY RESIDUAL CONTRACTUAL MATURITY AS ON 31-Dec-2018**

(AED 000's)

RESIDUAL CONTRACTUAL MATURITY	Loans	Debt Securities	Total Funded	Commitments	OTC Derivatives	Other Off-Balance Sheet exposures	Total Non-Funded	Gross
Less than 3 months	528,360	-	528,360	-	-	67,290	67,290	595,650
3 months to one year	62,267	-	62,267	-	-	53,478	53,478	115,745
One to five years	12,281,045	-	12,281,045	-	-	19,950	19,950	12,300,995
Over five years	-	-	-	-	-	-	-	-
Grand Total	12,871,672	-	12,871,672	-	-	140,718	140,718	13,012,390

Table 4(f)**IMPAIRED LOANS BY INDUSTRY SEGMENT AS ON 31-Dec-2018**

(AED 000's)

INDUSTRY SEGMENT	OVERDUE			PROVISIONS		ADJUSTMENTS		Total Impaired Assets
	Less than 90 days	90 days and above	Total	Specific	General	Write-offs	Write-backs	
Agriculture, Fishing & related activities ¹	-	-	-	-	-	-	-	-
Crude Oil, Gas, Mining & Quarrying ²	-	145,025	145,025	53,822	-	-	-	91,203
Manufacturing ³	-	566,649	566,649	170,165	-	-	-	396,484
Electricity & Water	-	-	-	-	-	-	-	-
Construction ⁴	-	331,739	331,739	16,725	-	-	-	315,014
Trade ⁵	-	9,808,691	9,808,691	3,489,398	-	-	-	6,319,293
Transport, Storage & Communication ⁶	-	10,655	10,655	4,136	-	-	-	6,519
Financial Institutions ⁷	-	52,878	52,878	14,608	-	-	-	38,270
Services ⁸	-	1,279,988	1,279,988	361,198	-	-	-	918,790
Government ⁹	-	-	-	-	-	-	-	-
Retail/consumer banking ¹⁰	-	73,526	73,526	6,078	-	-	-	67,448
All Others	-	-	-	-	-	-	-	-
Grand Total	-	12,269,151	12,269,151	4,116,130	-	-	-	8,153,021

1. Agriculture, Fishing and Allied Activities includes cultivation of crops, dairy and poultry farming, fishing other activities (sheep rearing, etc).

2. Crude Oil, Gas, Mining and Quarrying include crude petroleum, natural gas and others.

3. Manufacturing includes food, tobacco, beverages, textile, leather, footwear, clothing, furniture, fixtures, other wood products, paper, paper products, printing presses, chemical, chemical products, petroleum refining, petrochemicals, basic metal products including aluminum, fabricated metal products, machinery, equipment, construction materials (brick tiles, etc.), cement, ship building, engineering works, sawmills, marble tiles and other manufacturing.

4. Construction includes construction of buildings, contractors and other construction.

5. Trade includes wholesale trade in construction materials, consumer durables, motor vehicles, non-durables and retail trade.

6. Transport and communication includes taxis, and other land transport, water transport, air transport, warehousing, storage and others.

7. Financial institutions include insurance companies, money and exchange dealers, NBFCS and other financial institutions.

8. Services include hotel and restaurants, professional services, repair work (repair of motor vehicles, a/cs, etc.), recreation services (cinemas, sports club, etc.) and other services.

9. Government includes federal government and local government.

10. Retail/consumer lending includes personal loan installments, residential mortgage loans, car loans, credit cards, other retail products, loans for investments in shares etc.

Table 4(g)**IMPAIRED LOANS BY GEOGRAPHIC DISTRIBUTION AS ON 31-Dec-2018**

(AED 000's)

Geographic Region	OVERDUE			PROVISIONS		ADJUSTMENTS		Total Impaired Assets
	Less than 90 days	90 days and above	Total	Specific	General	Write-offs	Write-backs	
United Arab Emirates	-	12,064,378	12,064,378	4,106,630	-	-	-	7,957,748
GCC (excluding UAE)	-	-	-	-	-	-	-	-
Arab League (excluding GCC)	-	-	-	-	-	-	-	-
Asia	-	204,773	204,773	9,500	-	-	-	195,273
Africa	-	-	-	-	-	-	-	-
North America	-	-	-	-	-	-	-	-
South America	-	-	-	-	-	-	-	-
Caribbean	-	-	-	-	-	-	-	-
Europe	-	-	-	-	-	-	-	-
Australia	-	-	-	-	-	-	-	-
Others	-	-	-	-	-	-	-	-
Grand Total	-	12,269,151	12,269,151	4,116,130	-	-	-	8,153,021

Note: Jurisdictions should not be included more than once under the geographic region

Table 4(h)**RECONCILIATION OF CHANGES IN PROVISION FOR IMPAIRED LOANS FOR THE YEAR 31-Dec-2018**

(AED 000's)

Opening Balance of Provisions for Impaired Loans		3,192,352
Add:	Charge for the year	
	• Specific provisions	1,103,059
	• General provisions	-
Add:	Write-off of impaired loans to income statement	-
Less:	Recovery of loan loss provisions	(12,031)
Less:	Recovery of loans previously written-off	-
Less:	Write-back of provisions for loans	(147)
	Adjustments of loan loss provisions	-
Closing Balance of Provisions for Impaired Loans		4,283,233

Table 4(i)

LOAN PORTFOLIO AS PER STANDARDIZED APPROACH AS ON 31-Dec-2018

(AED 000's)

Assets Classes See Basel II, June 2006, Para 50 to 81, and Central Bank National Discretions	On Balance Sheet	Off Balance sheet	Credit Risk Mitigation (CRM)			Risk weighted assets
	Gross Outstanding	Net exposure after Credit Conversion Factors (CCF)	Exposure before CRM	CRM	After CRM	
Claims on Sovereigns	171,133	171,133	171,133	-	171,133	-
Claims on non Central Government public sector entities. (PSE's)	-	-	-	-	-	-
Claims on multilateral development banks	-	-	-	-	-	-
Claims on banks	2,241,544	2,241,544	2,241,544	-	2,241,544	735,443
Claims on securities firms	-	-	-	-	-	-
Claims on Corporates	609,237	540,399	540,399	380,147	160,252	160,252
Claims included in the regulatory retail portfolio	167,013	167,013	167,013	-	167,013	159,982
Claims to secured by residency property	-	-	-	-	-	-
Claims secured by commercial real estate	-	-	-	-	-	-
Past due loans	12,269,150	3,058,706	3,058,706	-	3,058,706	3,877,152
High risk categories	-	-	-	-	-	-
Other assets	1,049,159	1,040,680	1,040,680	-	1,040,680	1,006,587
Claims on securitized assets	-	-	-	-	-	-
Credit derivatives (Banks Selling protection)	-	-	-	-	-	-
TOTAL CLAIMS	16,507,236	7,219,475	7,219,475	380,147	6,839,328	5,939,416

a) Qualitative Disclosures

• For each portfolio, name of ECAs used, plus reasons for any changes
• Types of exposure for which each agency is used

LOAN PORTFOLIO AS PER STANDARDIZED APPROACH AS ON 31-Dec-2018

(AED 000's)

b) Quantitative Asset Class	Gross Credit Exposures					Exposures Subject to Deduction				
	Rated	Unrated	Total	Post CRM	RWA Post CRM	Rated	Unrated	Total	Post CRM	RWA Post CRM
Claims on Sovereigns										
Claims on Public Sector Entities										
Claims on Multilateral Development Banks										
Claims on securities firms										
Claims on Banks										
Claims on Corporate										
Regulatory & other retail exposure										
Residential retail exposure										
Commercial Real Estate										
Other assets										
Claims on Securitized Assets										
Credit Derivatives (Banks selling protection)										
Grand Total										

Table 7(a) & 7(b)

CREDIT RISK MITIGATION: DISCLOSURES FOR STANDARDIZED APPROACH AS ON 31-Dec-2018

a) Qualitative Disclosures

Policies and processes covering credit risk mitigation, including summary of:

• Policies and processes for, and an indication of the extent to which the bank makes use of, on- and off-balance sheet netting;
• Policies and processes for collateral valuation and management; Refer [Annex 7AB-1] on page # 33
• Description of the main types of collateral taken by the bank; Refer [Annex 7AB-2] on page # 34
• The main types of guarantor/credit derivative counter-party and their credit worthiness; and Refer [Annex 7AB-3] on page # 36
• Information about (market or credit) risk concentrations within the mitigation taken. Refer [Annex 7AB-4] on page # 38

(AED 000's)

b) Quantitative Disclosures	Exposures	Risk Weighted Assets
Gross Exposure prior to Credit Risk Mitigation	7,219,475	
Less: Exposure covered by on-balance sheet netting		
Less: Exposures covered by Eligible Financial Collateral	380,147	
Less: Exposures covered by Guarantees		
Less: Exposures covered by Credit Derivatives		
Net Exposures after Credit Risk Mitigation	6,839,328	5,939,416

Annex 7AB-1

"Policies and processes for collateral valuation and management"

Overview

Collateral and other credit enhancements

The amount and type of collateral required depends on an assessment of the credit risk of the counterparty. Guidelines are implemented regarding the acceptability of types of collateral and valuation parameters. The main types of collateral obtained are cash, securities, charges over real estate properties, inventory and trade receivables.

The Bank also obtains guarantees from parent company when giving loans to subsidiaries or other group companies or from owners when extending credit to their businesses.

Management monitors the market value of collateral (based on values of collaterals assessed at the time of extending credit), requests additional collateral in accordance with the underlying agreement. The estimates of fair values are generally not updated except when a loan is individually assessed or impaired. Collaterals are normally not held against amounts advanced to banks.

It is the policy of the Bank to dispose of repossessed properties in an orderly fashion. The proceeds are used to reduce or repay the outstanding claim. In general, the Bank does not occupy repossessed properties for business use.

Annex 7AB-2

"Description of the main types of collateral taken by the bank"

The types of securities/guarantees to be obtained from the customer seeking banks facilities shall be as under:

1. Banks lien on customers own or third party fixed deposit availability with the bank with proper authorization.
2. Mortgage of immovable properties.
3. Pledge of goods/gold bars/Jewellery.
4. Guarantees of other reputable banks.
5. Trade related bills/cheques received for collection, duly assigned favour of the bank.
6. Export LC received from Iran favouring our customers.
7. Iranian banks commitment to pay under Usance LC at specified maturities.
8. Irrevocable assignment of receivable under progress payment certificates (PPC) of government and reputable companies' projects favoring the bank.
9. Acceptable shares/ stock and valuable papers (bonds)
10. Acceptable official or bonded warehouse receipts.

11. Life insurance cover, (duly assigned in favor of the bank)
12. Promissory notes
13. Hypothecation of stocks and insurance thereof with banks mortgage clause.
14. Continuing guarantee of (independent) third party (other than the borrower).
15. Continuing guarantee of borrowers themselves and their own account with the bank or other banks.
16. Guarantees and securities obtained by other branches of bank BSI Iran outside UAE according to the local foreign exchange regulation and with the approval of the head office through regional office.

Note: **1:** Securities and guarantee for the credit facilities must be valid, easily salable and recoverable and must be sufficient to cover the dues to the bank: (principle, interest and any other charges/ expenses).

2: Margins for various securities /collaterals and or guarantees acceptable in the branches will be determined by the regional credit committee.

Annex 7AB-3

"The main types of guarantor/credit derivative counter-party and their credit worthiness"

GENERAL

A guarantee is a written promise to answer for the debt of another person (principal debtor) to whom the guarantor is already or is about to become liable.

The handling of advances against guarantees needs special care because the guarantor will often be ready to take advantage of any error or omission by the Bank to avoid liability. It is common experience that when the guarantor is called upon to meet the obligation, unpleasantness may ensue, and it is sometimes necessary to resort to legal action. However, it is sometimes expedient to accept unsecured guarantees but, as a general rule, security should be taken to support the guarantee, which in itself should cause the guarantor to reconsider his position and realize the implications involved.

Guarantees from relative or from those who would be presumed to exert influence (husband/wife, doctor/client, solicitor/client etc.) are fraught with danger. A guarantee from a member of the staff of the Bank should never be accepted.

As per the extant instructions, Branch should continue to obtain Continuing Guarantee form (printed document) duly signed by both the principal debtors and Guarantors.

The following precautions are being taken in advancing money on a guarantee.

- The Continuing Guarantee should be signed before any advance is made, and only after the guarantor has had it clearly explained to his exactly what his commitment entails. The guarantee should only be signed in the Bank in the presence of a witness, or where required under local law in presence of at least two witnesses.
- No guarantee should be taken without being satisfied that the guarantor not only is sound but will continue to be able to redeem his promise without any embarrassment. No guarantee should be taken from a minor.
- If a guarantee covers only a part of a customer's indebtedness to the Bank, the guaranteed account must be kept separately in order that the Bank's claim on the Guarantor can be precisely established.
- If a guarantee is given by more than one person, liability should be stated as joint and several.
- Though the banker is not bound to disclose all he knows about his customer's dealings, he must not conceal from the guarantor any facts materially affecting the transaction.

Annex 7AB-4

"Information about (market or credit) risk concentrations within the mitigation taken"

Risk concentrations of the maximum exposure to the credit risk

A risk concentration is any single exposure or group of related exposures with the potential to produce losses large enough to threaten the bank's health or ability to maintain its core operations. Risk concentrations are undoubtedly the single most important cause of major problems in the banking industry. Credit risk concentration arises in both direct exposures to obligors and may also occur through exposure to protection providers such as guarantors.

Concentration of risk is managed by client/counterparty, by geographical region and by industry sector. The financial assets of the Bank, before taking into account any collateral or provision held in the books or other credit enhancements, can be analyzed by the following geographical regions:

Geographic regions	2017 AED'000	2018 AED'000
Middle East	12,058,362	12,573,222
Iran	386,066	298,450
O.E.C.D	0	0
Other	0	0
Total	12,444,428	12,871,672

Industry Sector	2017 AED'000	2018 AED'000
Wholesale and retail trade	9,676,783	10,117,951
Government	-	-
Construction	581,105	414,475
Mining and quarrying	150,127	165,884
Services	1,316,117	1,387,200
Personal Loans	31,121	90,309
Manufacturing	566,048	570,337
Transport and communication	12,466	10,655
Financial institutions	110,660	114,,861
Total	12,444,428	12,871,672

As per the above, major Geographic and Obligor exposure is with the UAE and Iran due to the reason that the UAE stands as one of the major hubs for Import and Export of commodities in the Region resulting the Banks in the UAE to engage more in trade finance and other financing activities, due to this, the Bank's main concentration is in Trade Finance activities between UAE and I.R. of Iran which is considered a home country exposure for the bank. The Bank understands the risk, as it is well aware and updated with the market situation in Iran.

In order to avoid excessive concentrations of risk, the policies and procedures of the Bank includes specific guidelines to focus on maintaining a diversified portfolio. Identified concentrations of credit risks are controlled and managed accordingly.

Table 10**TOTAL CAPITAL REQUIREMENT FOR MARKET RISK UNDER STANDARDIZED APPROACH AS ON 31-Dec-2018**

(AED 000's)

Market Risk	Amount
Interest rate risk	-
Equity position risk	-
Foreign exchange risk	797
Commodity risk	-
Total Capital Requirement	797

a) Qualitative Disclosures

The general qualitative disclosure requirement (Paragraph 824 of Basel II) with respect to equity risk, including:

- Differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons; and
- Discussion of important policies covering the valuation and accounting of equity holdings in the banking book. This includes the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation as well as significant changes in these practices

As at _____, the bank's total equity investment portfolio in the banking book amounted to AED __ % of which represents quoted investments. For details of the accounting policies and valuation methodology, please refer to Note X to the consolidated financial statements under 'Significant Accounting Policies' Details of cost, market and fair value are reported in Note Y to the consolidated financial statements under the heading of "Non-Trading investments".

b) Quantitative Disclosures**1. QUANTITATIVE DETAILS OF EQUITY POSITION:**

(AED 000's)

Type	Current Year		Previous Year	
	Publicly Traded	Privately Held	Publicly Traded	Privately Held
Equities				
Collective investment schemes				
Any other investment				
Total				

2. REALIZED, UNREALIZED AND LATENT REVALUATION GAINS (LOSSES) DURING THE YEAR:

Gains (Losses)	Amount
Realized gains (losses) from sales and liquidations	-
*Unrealized gains (losses) recognized in the balance sheet but not through profit and loss account	-
**Latent revaluation gains (losses) for investment recorded at cost but not recognized in balance sheet or profit and loss account	-
Total	-

3. ITEMS IN (2) ABOVE INCLUDED IN TIER 1/TIER 2 CAPITAL:

(AED 000's)

Tier Capital	Amount
Amount included in Tier I capital	790,480
Amount included in Tier II capital	74,243
Total	864,723

4. CAPITAL REQUIREMENTS BY EQUITY GROUPINGS:

(AED 000's)

Grouping	Amount
Strategic investments	-
Available for sale	-
Held for trading	-
Total capital requirement	-

Table 14

INTEREST RATE RISK IN THE BANKING BOOK (IRRBB) AS ON 31-Dec-2018

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Interest rate risk is also assessed by measuring the impact of defined movements in interest yield curves on the Bank's net interest income. The following impact on the net interest income and regulatory capital for the year of an immediate and permanent movement in interest yield curves as at

(AED 000's)

Shift in Yield Curves	Net Interest Income	Regulatory Capital
+200 basis point	(121,670)	12,775
- 200 basis point	121,670	-

The above interest rate sensitivities are illustrative only and adopt simplified scenarios. The sensitivities do not incorporate actions that could be taken by management to mitigate the effect of interest rate movements.