# **CITY UNION BANK LTD.,**

Administrative Office, Kumbakonam

# BASEL- III PILLAR 3 DISCLOSURES AS ON 30.06.2024

## Table DF - 2

# **CAPITAL ADEQUACY**

# **Qualitative Disclosures:**

# A. A summary discussion of the Bank's approach to assessing the adequacy of its capital to support current and future activities.

In order to strengthen the capital base of banks in India, the Reserve Bank of India in April 1992 introduced capital adequacy measures in banks, based on the capital adequacy framework (Basel I) issued by Basel Committee on Banking Supervision (BCBS). Initially, the framework addressed capital for credit risk, which was subsequently amended to include capital for market risk as well and the Bank was compliant with regard to maintenance of minimum capital for credit and market risks.

Subsequently, the BCBS released the "International Convergence of Capital Measurement and Capital Standards: A Revised Framework" (popularly known as Basel II document) on June 26, 2004. Reserve Bank of India issued final guidelines on April 27, 2007 for implementation of the New Capital Adequacy (Basel II) Framework, which includes capital for Operational Risk. In line with the RBI guidelines, the Bank successfully migrated to the revised framework (Basel-II) from March 31, 2009.

Reserve Bank of India issued guidelines based on the Basel III reforms on capital regulation during May 2012, to the extent applicable to banks operating in India. The Basel III capital regulation has been implemented from April 1, 2013 in India in phases and it was decided originally to implement 'Capital Conservation Buffer Framework' fully from March 31, 2018. RBI issued detailed Guidelines on Composition of Capital Disclosure Requirements on May 28, 2013.

RBI had issued circulars on various dates extending the transitional period for full implementation of Basel III Capital Regulations due to the unfavorable economic situation and also due to the continuing stress on account of COVID - 19 crisis. Now the minimum regulatory requirement under Basel III with Capital Conservation Buffer (CCB) is 11.50% (9.00%+2.50%) with effect from October 1, 2021.

RBI has issued circular on "Prudential Guidelines on Capital Adequacy and Liquidity Standards – Amendments" on March 31, 2015. The Basel III Capital Regulations have been consolidated in Master Circular – Basel III Capital Regulations vide circular No. DOR.CAP.REC.3/21.06.201/2022-23 dated April 1, 2022, which includes the introduction of capital buffers.

Under the Basel II framework, the total regulatory capital comprises Tier I (Core Capital) and Tier 2 capital (Supplementary Capital). In order to improve the quality of regulatory capital, the capital will predominantly consist of Common Equity Tier1 (CET1) under Basel III. Non-equity Tier 1 and Tier 2 capital would continue to form part of regulatory capital subject to eligibility criteria as laid down in Basel III. The Basel III capital regulations continue to be

based on three-mutually reinforcing Pillars, viz. Minimum Capital Requirements (Pillar 1), Supervisory Review of Capital Adequacy (Pillar 2) and Market Discipline (Pillar 3) of the Basel II Capital Adequacy framework.

The Basel III norms mainly seek to:

- Raise the quality of capital to ensure that the banks are capable of absorbing losses, both as going concern and as gone concern basis.
- Increase the risk coverage of the capital framework.
- Introduce leverage ratio to serve as a backstop to the risk-based capital measure.
- Raise the standards for the supervisory review process and public disclosures.

The macro prudential aspects of Basel III are largely enshrined in the capital buffers. Both the buffers i.e. the Capital Conservation Buffer and the Counter Cyclical Buffer are intended to protect the banking sector from stressed situations and business cycles.

# Minimum Capital requirements under Basel-III:

Under the Basel III Capital Regulations, banks are required to maintain a minimum Pillar 1 Capital (Tier I + Tier II) to Risk-weighted Assets Ratio (CRAR) of 9% on an on-going basis. Besides these minimum capital requirements, Basel III also provides for creation of Capital Conservation Buffer (CCB) and Counter Cyclical Capital Buffer (CCCB).

As per the RBI guidelines mentioned, Capital ratios with full implementation of Capital Conservation Buffer (CCB) of 2.50% is summarized below:

(% of RWA's)

Capital Ratios	March 31, 2016 onwards	March 31, 2017 onwards	March 31, 2018 onwards	October 1, 2021 onwards
Minimum Common Equity Tier I (CET 1)	5.500	5.500	5.500	5.500
Capital Conservation Buffer (CCB)	0.625	1.250	1.875	2.500
Minimum CET 1 + CCB	6.125	6.750	7.375	8.000
Additional Tier I	1.500	1.500	1.500	1.500
Minimum Tier 1 Capital (excluding CCB)	7.000	7.000	7.000	7.000
Tier 2 Maximum allowed	2.000	2.000	2.000	2.000
Minimum Total Capital	9.000	9.000	9.000	9.000
Minimum Total Capital + CCB	9.625	10.250	10.875	11.500

# B. The Bank's approach in assessment of Capital Adequacy:

The Bank is following Standardised Approach, Standardised Duration Approach and Basic Indicator Approach for measurement of capital charge in respect of credit risk, market risk and operational risk respectively. Further, RBI has informed the banks to get ready to migrate to the New Standardised Approach for calculation of Operational Risk vide 'Master Direction on Minimum Capital Requirements for Operational Risk' dated June 26, 2023. We have computed the operational risk as per the new guidelines for March 31, 2023 and reported the same to RBI on July 27, 2023. Besides computing CRAR under the Pillar I requirement, the Bank also undertakes stress testing periodically in various risk areas to assess the impact of stressed scenario or plausible events on asset quality, liquidity, profitability and capital adequacy. The bank conducts Internal Capital Adequacy Assessment Process (ICAAP) on an annual basis to assess the sufficiency of its capital funds to cover the risks specified under Pillar-II of Basel guidelines. The adequacy of Bank's capital funds to meet the future business growth is being assessed in the ICAAP document.

## **C.** Quantitative Disclosures:

(₹ in crore)

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a)	Capital requirements for Credit Risk: (@ 9.00% on Risk Weighted Assets)		
	Portfolios subject to Standardised Approach (30685.52 * 9.00%)		2761.70
	Securitisation exposures		Nil
b)	Capital requirements for Market Risk:		
	Standardised Duration Approach		17.33
	Interest Rate Risk	6.65	
	Equity Risk	0.78	
	Foreign Exchange Risk	9.90	
c)	Capital requirements for Operational Risk:		
	Basic Indicator Approach (5141.74 * 8.00% )		411.34
	Minimum Capital required ( a+b+c )		3190.37
d)	Capital Conservation Buffer (CCB) at 2.50% (36043.92 * 2.50%)		901.10
	Minimum Total Capital + CCB		4092.47
	Total Capital Funds available		8497.57
	Total Risk Weighted Assets		36043.92
e)	Common Equity Tier I CRAR % (excluding CCB)		20.05%
	Capital Conservation Buffer		2.50%
	Tier I CRAR		22.55%
	Tier II CRAR		1.03%
	Total CRAR %		23.58%

### D. Risk Exposure and Assessment:

Risk is an integral part of banking business in an ever dynamic environment, which is undergoing radical changes both on the technology front and product offerings. The main risks faced by the bank are credit risk, market risk and operational risk. The bank aims to achieve an optimum balance between risk and return to maximize shareholder value. The relevant information on the various categories of risks faced by the bank is given in the ensuing sections. This information is intended to give market participants a better idea on the risk profile and risk management practices of the bank.

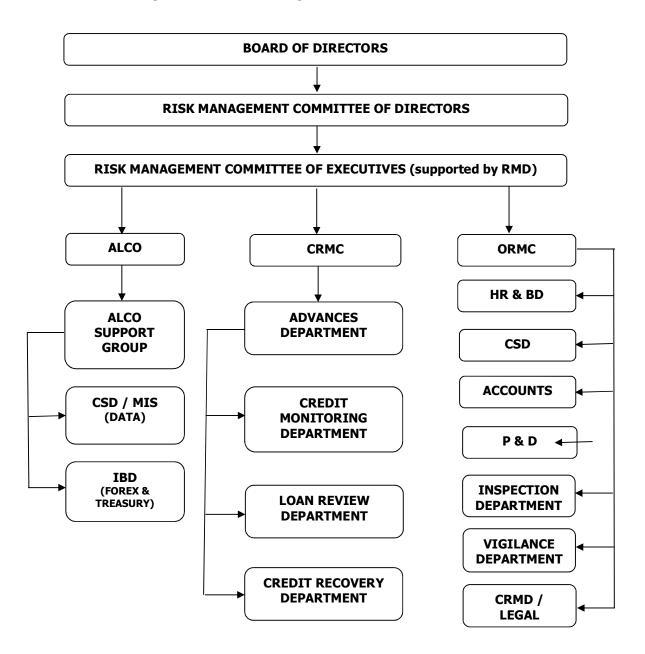
The Bank has a comprehensive risk management system to address various risks and has set up an Integrated Risk Management Department (RMD), which is an independent operational department. Bank has a Risk Management Committee of Board functioning at apex level for formulating, implementing and reviewing bank's risk management measures pertaining to credit, market and operational risks. Apart from the Risk Management Committee of the Board at apex level, the Bank has a strong bank-wide risk management structure comprising of Risk Management Committee of Executives (RMCE) assisted by Asset Liability Management Committee (ALCO), Credit Risk Management Committee (CRMC) and Operational Risk Management Committee (ORMC) at senior management level. Credit Risk Management Committee deals with credit policies and procedures, Asset Liability Management Committee deals with Asset Liability Management (ALM), Integrated Treasury Policy of the Bank to explore better investment avenue to earn a reasonable spread and Operational Risk Management Committee formulates policies and procedures for managing operational risks.

The Bank has formulated the following policies for mitigating the risk in various areas and monitoring the same:

- Integrated Risk Management Policy
- Loan Policy
- Credit Risk Management Policy
- Operational Risk Management Policy
- ALM Policy
- Integrated Treasury Policy
- KYC policy
- Risk Based Internal Audit Policy
- Stress Testing Policy
- Disclosure Policy
- ICAAP policy
- Credit Risk Mitigation & Collateral Management Policy
- Risk Rating Framework
- Pricing policy
- New Product Assessment Policy
- Risk & Control Self-Assessment standards (RCSA)
- Policy on Unhedged Foreign Currency exposures of corporates including SMEs

- Market Risk Management Policy
- Business Continuity Plan Policy
- Climate Risk Policy

The structure and organization of Risk Management functions of the Bank is as follows:



#### TABLE DF - 3

**CREDIT RISK: GENERAL DISCLOSURES** 

#### Credit Risk:

Credit Risk is a possibility of losses associated with diminution in the credit quality of borrowers or counterparties. In a bank's portfolio, Credit Risk arises mostly from lending activities of the bank, when a borrower is unable to meet their financial obligations emanating from potential changes in the credit quality / worthiness of the borrowers or counterparties.

Credit Risk Management encompasses a host of management techniques, which help the banks in mitigating the adverse impacts of credit risk. The objective of the Credit Risk Management is to identify measure, monitor and control credit risk by adopting suitable methodology.

The Bank has formulated Loan Policy which stipulates various prudential norms, benchmarks, guidelines for sanctioning of credits and recovery of the same. The Bank has also formulated a separate Credit Risk Management Policy, besides a Policy on Credit Risk Mitigation and Collateral Management.

Credit Risk is assessed by a robust internal credit risk rating system. Credit Risk Rating is the process wherein the merits and demerits of a borrower are captured and scorings assigned, which enables the Bank to take a view on the acceptability or otherwise of any credit proposal.

We have digitized the lending process and making credit decisions through Newgen Software Technologies Limited for Retail loans and Corporate loans (MSME & Non-MSME) up to the exposure of Rs.7.50 crore with the help of Boston Consulting Group for development of risk scorecard on Digital lending and also engaged few fintechs like scoreme, perfois (Credit Assessment Report), Hunter / Experian (Fraud Assessment of borrower), Legality (Digital signing and documentation) for specific purpose as mentioned. Bank has been using BCG Chariot rating for MSME and scorecard of Experian for retail credit.

### **Credit Risk Management Policy:**

The Bank has put in place a well-structured Credit Risk Management Policy duly approved by the Board. The Policy document defines organization structure, roles & responsibilities and the processes whereby the Credit Risk can be identified, quantified and managed. Credit Risk is monitored on a bank wide basis and the compliance with regard to the risk limits approved by the Credit Risk Management Committee (CRMC)/ Board is ensured.

The Bank adopts the definition of 'past due' and 'impaired credits' (for reporting purposes) as defined by Reserve Bank of India under Income Recognition, Asset Classification and provisioning (IRAC) norms (vide RBI Master Circular dated October 01, 2021).

# **Quantitative Disclosures:**

Total Gross Credit Risk Exposures including Geographic Distribution of Exposure:

(₹ in crore)

Exposure as on June 30, 2024	Domestic	Overseas	Total
Fund based	50640.29	-	50640.29
Non-fund based (including derivative exposure)	2209.44	-	2209.44
Investment (Non SLR)	153.50	-	153.50
Total	53003.23	-	53003.23

# Industry type distribution of exposures as on June 30, 2024

(₹ in crore)

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INDUSTRY /ACTIVITY	Funded Exposure	Non- Funded Exposure	Investment Exposure (Non SLR)	Total Exposure
Mining and Quarrying	136.57	29.28	0.00	165.85
Iron and Steel	1497.33	61.10	0.33	1558.76
Other Metal and Metal Products	754.74	124.85	0.00	879.59
Engineering of which Electronics	337.45	18.55	0.00	356.00
Others (Incl Electrical & Home Appliances)	587.03	131.50	0.00	718.53
Cotton Textiles	1505.01	59.08	0.00	1564.09
Other Textiles	3033.77	97.90	1.55	3133.22
Food Processing	677.80	6.58	0.00	684.38
Beverages and Tobacco	14.09	0.00	0.00	14.09
Leather and Leather Products	27.83	0.00	0.00	27.83
Wood and Wood Products	133.15	15.73	0.00	148.88
Paper and Paper Products	603.74	20.69	0.00	624.43
Petroleum, Coal Products and Nuclear Fuels	178.81	0.54	0.00	179.35
Drugs and Pharmaceuticals	39.62	27.82	0.00	67.44
Other Chemicals and Chemical Products	466.44	35.23	0.00	501.67
Rubber, Plastic and their Products	435.90	13.64	0.00	449.54
Glass & Glassware	0.45	0.00	0.00	0.45
Cement and Cement Products	5.45	0.74	0.00	6.19
Vehicles, Vehicle Parts and Transport Equipments & Auto Parts	181.51	3.90	0.02	185.43
Gems and Jewellery	427.26	17.30	0.00	444.56
Construction	738.92	355.15	0.00	1094.07
Infrastructure	10.56	0.00	0.00	10.56

INDUSTRY /ACTIVITY	Funded Exposure	Non- Funded Exposure	Investment Exposure (Non SLR)	Total Exposure
Other Industries	1269.56	161.76	0.00	1431.32
All Industries/ Activities Total	13062.99	1181.34	1.90	14246.23
Residuary (other exposures)	37577.30	1028.10	151.60	38757.00
Total Gross Exposure	50640.29	2209.44	153.50	53003.23

The details of the industries wherein the bank's exposure in the related industry has exceeded the 5% of the total gross credit exposure as on June 30, 2024 is furnished below

(₹ in crore)

Industry	Total exposure	% to Gross credit exposure
Other textiles	3133.22	5.91

# Residual contractual maturity breakdown of Assets June 30, 2024

(Computed as per the guidelines of RBI on Asset Liability Management)

(₹ in crore)

Period	Cash, RBI Balance & Balance with all Banks	Advances (Net)	Investments (Net)	Fixed & Other Assets	Total
1 day	1212.49	481.59	7366.23	88.03	9148.34
2 to 7 days	177.37	2759.87	728.40	181.84	3847.49
8 to 14 days	121.25	2082.90	497.89	215.00	2917.04
15 to 30 days	84.29	654.39	346.13	65.15	1149.96
31 days & upto 2 months	1088.03	1550.32	530.00	14.91	3183.26
Over 2 months & upto 3 months	524.43	1903.12	270.18	14.91	2712.64
Over 3 months & upto 6 months	632.46	3606.66	885.06	452.88	5577.06
Over 6 months & upto 1 Year	212.80	8531.89	873.88	116.12	9734.69
Over 1 year & upto 3 years	1343.85	17335.50	4353.04	428.95	23461.34
Over 3 years & upto 5 years	4.10	2422.38	26.89	61.49	2514.86
Over 5 years	0.93	4266.37	132.91	1501.29	5901.53
Total	5402.04	45594.99	16010.61	3140.57	70148.21

# Gross NPA (₹ in crore)

Sub-standard	422.48
Doubtful 1	301.33
Doubtful 2	671.98
Doubtful 3	254.05
Loss	156.60
Gross NPA Total	1806.45

**Net NPA** (₹ in crore)

Net NPA Total	853.50
Loss	0.00
Doubtful 3	0.00
Doubtful 2	319.89
Doubtful 1	200.65
Sub-standard	332.96

# **Geographical-wise NPA**

(₹ in crore)

Particulars	Domestic	Overseas	Total
Gross NPA	1806.45	Nil	1806.45
Provision for NPA	931.46	Nil	931.46
Provision for Standard asset	268.63	Nil	268.43

Particulars	(%)
Gross NPA to Gross Advances	3.88%
Net NPA to Net Advances	1.87%

(₹ in crore)

Major Industry	O/s Bal	Gross NPA	Provision held
Other Textiles	2660.98	114.99	66.61

# The movement of NPA is as under:

(₹ in crore)

Sl.no	Position	NPA
1.	Opening balance at the beginning of the Quarter (01st April, 2024)	1854.43
2.	Additions during the Quarter	178.29
3.	Reductions during the Quarter	226.27
4.	Closing balance at the end of the Quarter (30 <sup>th</sup> June, 2024) (1+2-3)	1806.45

# The movements of provisions for NPAs are as under:

(₹ in crore)

Sl.no	Position	Total Provision
1.	Opening balance at the beginning of the Quarter (01st April, 2024)	933.50
2.	Provisions made during the Quarter	32.00
3.	Write-off/Write-back of excess provisions during the Quarter	34.04
4.	Closing Balance at the end of the Quarter (30th June, 2024) (1+2-3)	931.46

(₹ in crore)

Recovery made during the Quarter 30 <sup>th</sup> June, 2024 which is directly taken to Income Account	44.23
Non-performing investment	3.54
Provision held for non-performing investment	3.54

# The movement of provisions for depreciation on investments

(₹ in crore)

Sl.no	Position	Total Provision
1.	Opening balance at the beginning of the Quarter (01st April, 2024)	5.01
2.	Provisions made during the Quarter	
3.	Write-off during the Quarter	
4.	Write-back of excess provisions during the Quarter	5.01
5.	Closing Balance at the end of the Quarter (30 <sup>th</sup> June, 2024) ( $1+2-3-4$ )	

TABLE: DF - 4

# CREDIT RISK: DISCLOSURES FOR PORTFOLIO SUBJECT TO THE STANDARDISED APPROACH

#### **Qualitative Disclosures:**

The Bank is accepting the ratings of the External Credit Rating Agencies approved by Reserve Bank of India, namely a) CRISIL, b) ICRA, c) CARE, d) India ratings & research Pvt Ltd, e) Acuite ratings & research Ltd and f) Infomerics Valuation and Rating Pvt. Ltd. to facilitate the corporate borrowers who enjoy credit facilities to get themselves rated. The corporates which are yet to get the approved ratings from these rating agencies are treated as 'unrated'. RBI has mandated to include the bank name in the credit rating to treat it as valid rating.

The Bank computes risk weight on the basis of external rating assigned, both long-term and short-term, for the facilities availed by the borrowers. The external ratings assigned are generally facility specific. The Bank follows the below mentioned procedures as laid down in the Basel III guidelines for usage of external ratings:

- Rating assigned by one rating agency is used for all the types of claims on the borrowing entity.
- Long-term ratings are used for facilities with contractual maturity of one year & above.
- Short-term ratings are generally applied for facilities with contractual maturity of less than one year.

# **Quantitative Disclosures:**

As per Standardised Approach, the exposure after risk mitigation for both rated and unrated are given in the following major three risk buckets along with deducted portion as per risk mitigation are given below.

(₹ in crore)

Risk Weight	Rated	Unrated	Total
Below 100 %	1112.46	40442.06	41554.52
At 100 %	201.25	14450.55	14651.80
More than 100 %	612.24	1982.46	2594.70
Total outstanding after Mitigation	1925.95	56875.07	58801.02
Deducted (as per Risk Mitigation)	41.41	14299.04	14340.45

**Table DF - 16** 

# **EQUITIES: DISCLOSURE FOR BANKING BOOK POSITIONS**

### **Qualitative Disclosures:**

In accordance with RBI new Investment guidelines, the investment portfolio of the bank is classified as under three categories

- Held To Maturity (HTM)
- Available For Sale (AFS)
- Fair Value Through Profit & Loss (FVTPL)
  - FVTPL Held For Trading (HFT)
  - FVTPL Non-HFT

HTM – The securities are acquired with an objective of holding till maturity (i.e) the financial assets are held with objective to collect the contractual cash flows.

AFS - The securities are acquired with an objective that is achieved by both collecting contractual cash flows and selling securities. On initial recognition a bank may make an irrevocable election to classify an equity instrument that is not held with an objective of trading under AFS.

FVTPL – Securities that do not qualify for inclusion in HTM or AFS shall be classified under FVTPL. Equity shares, other than (a) equity shares of subsidiaries, associates or joint ventures and (b) equity shares where at initial recognition, the irrevocable option to classify at AFS has been exercised. For all investment, FVTPL – HFT category are valued at Market Price and net depreciation / appreciation after revaluation, if any, is charged to revaluation Profit / Loss account.

# **Quantitative Disclosures:**

(₹ in million)

S.no	Particular	Value
1	Value disclosed in the balance sheet of investments (Book value)	136.75
	fair value of those investments (Market value as on 30.06.2024)	117.45
	For quoted securities, a comparison to publicly quoted share values where the share price is materially different from fair value	NA (Unquoted form)
2	The types and nature of investments, including the amount that can be classified as –	-
	Publicly traded and	136.75
	Privately held.	
3	The cumulative realised gains (losses) arising from sales and liquidations in the reporting period	-
4	Total unrealised gains (losses)	-
5	Total latent revaluation gains (losses)	-
6	Any amounts of the above included in Tier 1 and/or Tier 2 capital	1
7	Capital requirements broken down by appropriate equity groupings, consistent with the bank's methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory transition or grandfathering provisions regarding regulatory capital requirements	-

#### Table DF-17

### **LEVERAGE RATIO**

Leverage ratio is a non-risk based measure of all exposures for the Tier-I Capital. The leverage ratio is calibrated to act as a credible supplementary measure to the risk based capital requirements. The Basel III leverage ratio is defined as the capital measure (the numerator) divided by the exposure measure (the denominator), with this ratio expressed as a percentage. Previously, the indicative benchmark Leverage Ratio prescribed was 4.50% (minimum), which has been reduced to 3.50% (minimum) as per the RBI circular on "Basel III Capital Regulations - Implementation of Leverage Ratio", vide DBR.BP.BC.No.49/21.06.201/2018-19 dated June 28, 2019.

Leverage Ratio = Capital Measure (Tier I Capital) / Exposure Measure

SUMM	SUMMARY COMPARISON OF ACCOUNTING ASSETS VS LEVERAGE RATIO EXPOSURE MEASURE – June 30, 2024		
Sl.no.	Item	Amount (₹ in million)	
1.	Total consolidated assets as per published financial statements	701482.18	
2.	Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	(7.28)	
3.	Adjustment for fiduciary assets recognized on the balance sheet pursuant to the operative accounting framework but excluded from the leverage ratio exposure measure		
4.	Adjustments for derivative financial instruments	2290.35	
5.	Adjustment for securities financing transactions (i.e. repos and similar secured lending)		
6.	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off- balance sheet exposures)	25598.08	
7.	Other adjustments (intangible & AFS reserves)	(1058.54)	
	Leverage Ratio exposure	728304.79	

# Table DF - 18 LEVERAGE RATIO COMMON DISCLOSURE TEMPLATE - June 30, 2024

(₹ in million)

Sl.no.	Item	Amount
	On – Balance Sheet Exposures	
1.	On-Balance Sheet items (excluding Derivatives and SFTs, but including Collateral)	701482.18
2.	(Asset amounts deducted in determining Basel III Tier 1 Capital)	(1065.82)
3.	Total On-Balance Sheet exposures (excluding Derivatives and SFTs) (sum of lines 1 and 2)	
	Derivative Exposures	
4.	Replacement cost associated with all Derivative transactions (i.e. net of eligible cash variation margin)	2290.35
5.	Add-on amounts for PFE associated with all Derivative transactions	-
6.	Gross-up for derivatives collateral provided where deducted from the Balance Sheet Assets pursuant to the operative accounting framework	-
7.	(Deductions of receivables assets for cash variation margin provided in Derivative transactions)	
8.	(Exempted CCP leg of client-cleared trade exposures)	
9.	Adjusted effective notional amount of written Credit Derivatives	
10.	(Adjusted effective notional offsets and add-on deductions for Written Credit Derivatives)	1

Sl.no.	Item	Amount
11.	Total Derivative Exposures (sum of lines 4 to 10)	2290.35
	Securities financing transaction exposures	
12.	Gross SFT assets (with no recognition of netting), after adjusting for sale accounting transactions	-
13.	(Netted amounts of cash payables and cash receivables of gross SFT Assets)	
14.	CCR exposure for SFT Assets	
15.	Agent transaction exposures	
16.	Total securities financing transaction exposures (sum of lines 12 to 15)	
	Other Off-Balance Sheet exposures	
17.	Off-Balance Sheet exposure at gross notional amount	76979.51
18.	(Adjustments for conversion to credit equivalent amounts)	(51381.43)
19.	Off-Balance Sheet items (sum of lines 17 and 18)	25598.08
	Capital and Total Exposures	
20.	Tier 1 Capital	81261.49
21.	Total Exposures (sum of lines 3, 11, 16 and 19)	728304.79
	Leverage Ratio	
22.	Basel III Leverage Ratio ( 20 /21)	11.16%

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