DISCLOSURE REQUIRED UNDER BASEL II NORMS

Table 1
Scope of Application

Qualitative Disclosure

(a)	The Framework applies to BNP Paribas Indian Branches
(b)	Subsequent to the stake picked up by Union de Credit Pour Le Batiment SA (UCB) a 100% subsidiary of BNP Paribas SA, France in Sundaram Home Finance Company Limited RBI has instructed us to prepare consolidated prudential returns taking into account the financials of Sundaram Home Finance. As per the instruction received from RBI this will be a full consolidation but since BNP Paribas India does not hold any stake in the said company the same will not be consolidated for accounting purposes (AS-21/27).
(c)	Apart from consolidation of Sundaram Home Finance for regulatory purposes, there are no other companies whose financials are consolidated either for regulatory or for accounting purposes.

Quantitative Disclosure

(a)	The aggregate amount of capital deficiencies in all subsidiaries not included in the consolidation i.e, that are deducted -------- **NIL**
(b)	The aggregate amount of the bank's total interests in insurance entities which are risk-weighted as well as their name, their country of incorporation or residence, the proportion of ownership interest and, if different, the proportion of voting power in these entities.----**NIL**

Table 2
Capital Structure

Qualitative Disclosure

a) The Capital instruments of the bank are given as below

- Tier I Capital: Being a Foreign bank, the Bank's Tier I Capital consists of interest free deposit received from Head office, Statutory reserve, Capital reserve, General Reserve & Remittable surplus retained in India for capital adequacy purpose. Bank does not have any hybrid debt instruments which are eligible for Tier I capital.

- Tier II Capital: Our Tier II Capital consists primarily of Subordinated debt instrument subscribed by Bank's Head Office, the issuance of these adhere to RBI guidelines. Apart from Subordinated debt instruments, General provision for debts & Revaluation reserve constitute Tier II Capital. Bank has not issued Hybrid debt instruments which are eligible to be included as Tier II Capital.

Quantitative Disclosure

(b)	The breakup of Tier I Capital as on 31st March 2013 is as given below (Fig in INR Crores)	
1)	Remittance received from HO:	1,069.58
2)	Statutory Reserve:	293.63
3)	Capital Reserve:	14.40
4)	General Reserve:	18.33
5)	Remittable surplus retained:	764.20
6)	Intangible assets :	(25.68)
	Total:	**2,134.47**
(c)	The total amount of Tier II Capital as on 31st March 2013 is INR Crores 561.67	
(d)	Debt capital instruments eligible for inclusion in Upper Tier II Capital- NIL	
(e)	Subordinated debt eligible for inclusion in Lower Tier II Capital 1) Total amount outstanding: 605.95 2) Of which amount raised during the year: NIL 3) Amount eligible to be reckoned as capital funds: 405.82	
(f)	Other deduction from capital, if any: NIL	
(g)	Total eligible capital as on 31st March 2013 - 2,696.14	

Table 3 : Capital Adequacy

Qualitative Disclosure

a) A summary discussion of the bank's approach to assessing the adequacy of 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 measure in banks, based on the capital adequacy framework (Basel 1) 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. In line with the guidelines issued by the RBI, the bank has been compliant in regards to maintenance of minimum capital for credit and market risks.

Subsequently, the BCBS has released the "International Convergence of Capital Measurements and Capital Standards: A Revised Framework. In addition, the RBI has issued clarifications on 31st March, 2008 on certain issues relating to the subject.

In line with the RBI guidelines, the bank has migrated to the revised framework from 31.03.2008. The bank continued the parallel run of Basel 2 framework by continuously tracking the exposures and studied the impact on bank's CRAR on a quarterly basis with a view to ensuring smooth transition to revised framework.

Basel 2 framework provides a range of options for determining the capital requirements for credit risk, market risk and operational risk. The framework allows the bank and the supervisors to select approaches that are most appropriate for their operations and financial markets. In accordance with the RBI's requirement, the bank has adopted Standardized Approach (SA) for Credit Risk and Basic Indicator Approach (BIA) for Operational Risk to compute capital from 31.03.2008. Additionally, the bank continues to apply the Standardized Duration Approach (SDA) for computing the capital requirement for Market Risk. As such, in addition to maintaining capital for credit and market risks as hither to, the bank maintains capital for operational risks from 31.03.2008.

The RBI prescribes the banks to maintain a minimum Capital to Risk-weighted Assets Ratio (CRAR) of 9 percent with regard to credit risk, market risk and operational risk on an ongoing basis as against the 8 percent prescribed in the Basel documents. RBI also prescribes prudential floor (as 80% of minimum capital requirement computed under Basel 1 for credit risk and market risk as on 31.03.2013) for maintaining capital as per the revised framework.

Particulars	Basel I (a)	Basel II (b)	Lower of (a & b)
Tier I	12.43%	10.94%	10.94%
Tier II	3.27%	2.88%	2.88%
Total	15.70%	13.82%	13.82%

The capital adequacy of the Bank is placed before its Management Committee on a quarterly basis wherein the same is discussed and the adequacy of the same is elaborated keeping in view the future growth plan of the Bank. Apart from the quarterly report the Bank's management also asks for the capital adequacy at more frequent intervals such as at month ends, to assess the adequacy of the capital. Management places a note to the Group office as and when a need is felt for additional capital infusion.

Quantitative Disclosure

(a) Capital requirements for credit risk : (Figures as on 31st March 2013 and in Rs. Crores)

1) Portfolios subject to standardized approach: 1,300.91 (Pillar 1 of Basel II)
2) Securitization exposure: NIL

(b) Capital requirements for Market risk : (Figures as on 31st March 2013 and in Rs. Crores)
Standardized duration approach (Pillar 1 of Basel II):

3) Interest rate risk: 303.57
4) Foreign exchange risk: 55.70
5) Equity risk :0.001

(c) Capital requirements for Operational risk under Basic indicator approach (Pillar 1 of Basel II) : 95.67

(d) Total & Tier 1 capital ratio:

- For the top consolidated group(Bank): 13.82% (total) & 10.94% (Tier 1)
- For significant bank subsidiaries: NA

Table 4
Credit risk: General disclosures for all banks

Qualitative Disclosure

a) **Credit Risk**:

Credit risk is the risk of incurring an economic loss on loans and receivables, existing or potential due to prior commitments, resulting from the credit quality migration of the Bank's debtors, which may eventually come to default. The probability of default and the expected recovery on the loan or receivable in the event of default are key components of the credit quality assessment.
Credit risk, measured at portfolio level, takes into account correlations between the values of the loans and receivables making up the portfolio concerned.
Credit risk arises in relation to lending activities as well as market, investment and payment transactions that potentially expose the Bank to the default risk of the counterpart. It is also the same case for Counterparty risk that represents the bilateral credit risk relating to the counterparty with which a transaction is entered into and of which the amount may vary over time, in line with market parameters that impact the value of the instrument.
Concentration risk and diversification effects are embedded within credit risk. When advanced methods are not used, concentration risk is captured through the monitoring of large exposures.

Credit risk Management Policies:

The Bank has put in place a well structured Credit Risk Management Policy duly approved by the Board. The policy document defines organizational structure, role and responsibilities and the processes whereby the Credit Risks carried by the Bank can be identified, quantified and managed within the framework that Bank considers consistent with its mandate and risk tolerance.

Credit Rating and Appraisal Process:

The Bank manages its Credit Risk through continuous measuring and monitoring of risks at each obligor and portfolio level. The Bank has robust internal Credit rating framework and well established standardized Credit appraisal / approval processes. Credit Rating is a facilitating process that enables the Bank to assess the inherent merits and demerits of a proposal. It is a decision enabling tool that helps the Bank to take a view on acceptability or otherwise of any Credit proposal.

The internal rating factors, quantitative and qualitative issues relating to management risk, business risk, industry risk, financial risk and project risk besides, such ratings consider transaction specific Credit enhancement features while assessing the overall ratings of the borrower. The data on industry risk is constantly updated based on market conditions.

Additionally, the Bank has in place a Board approved detailed policy on Credit Risk Mitigation and management.

Definitions of Non - Performing assets:

The bank follows the prudential guidelines issued by the RBI on classification of Non – Performing Assets as under:
1. Interest and/or installment of principal remain overdue for a period of more than 90 days in respect of term loan.
2. The account remains 'out of order' if the outstanding balance remains continuously in excess of sanctioned limits/DP for more than 90 days in respect of overdraft or cash credit
3. The bill remains overdue for a period of more than 90 days in case of bills purchased and discounted
Where the interest charged during any quarter is not serviced fully within 90 days from the end of the quarter, the asset is classified as non-performing. A non-performing asset ceases to generate income of the bank.

Quantitative Disclosure

a) Gross Credit exposure (Rs in crore)

Fund based: 7,753.55 (Gross advances)
Non Fund based: 5,442.11 (Guarantees, LCs, Endorsement and Acceptances)

b) Geographic distribution of exposures

Domestic
Fund based: 7,753.55
Non Fund based: 5,442.11

International
Fund based: NIL
Non Fund based: NIL

c) Industry wise distribution of exposure

(Rs in crore)

Industry Name	Funded	Non-Funded
Mining	15.73	5.63
Food Processing	8.89	2.25
Beverages & tobacco & tobacco products	246.01	4.26
Wood and Wood Products	0.00	0.01
Paper & paper products	32.94	7.88
Rubber & Rubber products	70.28	6.95
Chemicals, Dyes, Paints, etc.	1186.72	123.22
Of which Fertilisers	149.13	0.29
Of which Drugs & Pharmaceuticals	384.19	72.58
Glass & Glassware	22.55	12.91
Other Metal & Metal Products	351.99	9.85
Cement	294.90	2.24
Leather & Leather products	0.00	0.13
Construction	63.55	279.25
Petroleum	488.99	0.00
Computer software	0.00	84.05
Infrastructure	344.23	11.99
Of which power	121.97	0.00
Of which Telecommunications	217.14	0.00
Other Industries	107.05	7.06
Iron & Steel	240.71	16.42
All Engineering	885.61	399.67
Vehicles, Vehicle Parts and Transport Equipments	667.78	67.25
Other textiles	75.25	0.79
Residual to balance Gross exposure	2650.35	4400.30
Total	**7753.55**	**5442.11**

d) Residual Maturity of assets

(Rs in crore)

Bucket	Cash & Balances with RBI	Balances with other Banks	Investments	Advances	Fixed asset & Other assets	Total
1 Day	(31.01)	0.06	145.29	34.91	371.29	**520.53**
2-7 Days	-	-	1,094.54	391.59	0.13	**1,486.26**
8 to 14 days	-	-	142.65	205.51	0.10	**348.26**
15 to 28 days	124.78	-	245.13	579.52	1.60	**951.03**
29days and upto 3 months	85.50	-	651.61	1,121.29	246.30	**2,104.53**
Over 3 months and upto 6 months	32.63	-	555.42	572.00	2.72	**1,162.77**
Over 6 months and upto 1 year	23.08	-	775.14	600.78	0.56	**1,399.56**
Over 1 year and upto 3 years	43.00	42.91	296.34	3,571.15	1.39	**3,954.79**
Over 3 years and upto 5 years	50.59	-	474.69	654.89	1.32	**1,181.49**
Over 5 years	6.54	-	183.54	5.65	373.93	**569.66**
Total	**335.11**	**42.97**	**4,564.34**	**7,737.29**	**999.17**	**13,678.88**

e) Amount of Gross NPAs (Rs. in crore)

- Substandard: 0.00
- Doubtful 1 16.25
- Doubtful 2 0.00
- Doubtful 3 0.00
- Loss 0.00

f) Net NPAs – 0.00

g) NPA Ratios

- Gross NPAs to Gross Advances: 0.21%
- Net NPAs to Net Advances: 0.00%

h) Movement of Gross NPAs (Rs. in crore)

- Opening balance: 27.45
- Additions: 0.00
- Reduction: (2.61)
- Write off: (8.59)
- Closing balance 16.25

i) Movement of provisions for NPAs (Rs. in crore)

- Opening balance: 23.34
- Additions: 3.92
- Reduction: (2.42)
- Write off : (8.59)
- Closing balance : 16.25

(j) Amount of Non-performing investments: NIL

(k) Amount of provision held for Non-performing investments: NIL

(l) Movement of provisions for depreciation on investments (Rs. in crore)

- Opening balance: 44.41
- Provisions made during the period : 0.00
- Write off: 0.00
- Write back of provisions during the period: 43.38
- Closing balance: 1.03

Table 5
Credit risk: disclosure for portfolios subject to the standardized approach

Qualitative Disclosure

a) General Principle:

In accordance with the RBI guidelines, the bank has adopted Standardized Approach of the New Capital Adequacy Framework (NCAF) for computation of capital for credit risk with effect from 31.03.2008. In computation of capital, the bank has assigned risk weights to different asset classes as prescribed by the RBI.

External Credit Ratings (ECRA):

Ratings of borrowers by External Credit Rating Agencies (ECRA) assume importance in the light of guidelines for implementation of the New Capital Adequacy Framework (Basel 2). Exposures on Corporates / PSEs / Primary Dealers are assigned with risk weights based on the external ratings. For this purpose, the RBI has permitted banks to use the ratings of four domestic ECRAs namely Credit Analysis and Research Ltd. (CARE), CRISIL Ltd., FITCH India Ltd. and ICRA Ltd. In consideration of the above guidelines, the bank has decided to accept ratings assigned by all these ECRAs.

The assets in the banking book are identified as those with pari passu clause/ seniority clause or otherwise. Where the claim is senior or pari passu, issue ratings available from rating agencies are migrated to our exposures provided the conditions mentioned in the RBI circular are met, where the rating available pertains to unsecured exposure then the Bank has used the same for its exposures. The Bank has purchased the CRISIL package to perform the rating migration and credit risk computation under the new framework.

Quantitative Disclosure

a) For exposure amounts after risk mitigation subject to the standardized approach, amount of a bank's outstanding in the following three major risk buckets as well as those that are deducted.

(Amounts – Rs in crore)

- Below 100% risk weight: 18,351.27
- 100% risk weight: 9,209.91
- More than 100% risk weight: 134.84
- Deducted from capital - Nil

Table 6
Credit risk: disclosure for portfolios subject to the standardized approach

Qualitative Disclosure

a) **Policy on credit risk mitigation**:

In line with the regulatory requirements, the bank has put in place a well articulated policy on Collateral Management and Credit Risk Mitigation Techniques, duly approved by the bank's Board. The policy lays down the types of securities normally accepted by the bank for lending and administration / monitoring of such securities in order to safeguard / protect the interest of the bank so as to minimize the risks associated with it.

The main type of securities (both prime and collateral) accepted by the bank includes bank's own deposits, Gold / Ornaments, National Savings Certificate, Indira Vikas Patra, Kisan Vikas Patras, 10 Year Social Security Certificates, Shares and Debentures, Central and State Government securities, Life Insurance Policies, Mutual Fund units, Immovable Properties, Plant and Machinery, Goods and Merchandise, Documents of Title to Goods, Book Debts, Vehicles and other moveable assets. The bank has also framed well defined policy on valuation of immovable properties, Plant and Machineries, duly approved by the Board.

Credit Mitigation under Standardized Approach:

As advised by the RBI, the bank has adopted the comprehensive approach relating to credit risk mitigation under Standardized Approach, which allows fuller offset of securities (prime and collateral) against exposure, by effectively reducing the exposure amount by the value ascribed to the securities. Thus, the eligible financial collaterals are fully made use of to reduce the credit exposure in computation of credit risk capital. In doing so, the bank has recognised specific securities namely, Bank Deposits, Gold / Ornaments, Life Insurance Policies, Kisan Vikas Patras (after a lock-in of 2.5 years), Government securities, Units of Mutual Funds, in line with the RBI guidelines on the matter.

Besides, other approved forms of credit risk mitigation are 'On Balance Sheet netting' and availability of 'Eligible Guarantees'. On balance sheet nettings have been reckoned to the extent of the deposits available against the loans / advances of the borrower (to the extent of exposure) as per the RBI guidelines. Further, in computation of credit risk capital, the types of guarantees recognised for taking mitigation, in line with RBI guidelines are Central Government Guarantee (0%), State Government (20%), CGTSI (0%), ECGC (20%), Bank Guarantee in the form of Bill purchased / discounted under Letter of Credit (20% or as per rating of foreign banks), Corporate Guarantee (AA- or better) (as per external rating). The bank has ensured compliance of legal certainty as prescribed by the RBI in the matter of credit risk mitigation.

Concentration Risk in Credit Risk Mitigation:

All types of securities eligible for mitigation are easily realisable financial securities. As such, presently no limit / ceiling have been prescribed to address the concentration risk in credit risk mitigants recognised by the bank.

Quantitative Disclosure

A) Under the standardized Approach, the total credit exposure covered by eligible financial collaterals after application of haircuts as on 31st March 2013 is Rs. 352.85 crores.

B) Under the standardized Approach, the total credit exposure covered by guarantee / credit derivative as on 31st March 2013 is Rs. 605.13 crores.

Table 7
Securitisation disclosure - NA

Table 8 :Market risk in trading book

Qualitative Disclosure

a) **Market Risk**:
Market risk is defined as the risk of incurring an economic loss as a result of adverse changes in market parameters, those ones being directly tradable or not. Tradable market parameters include, but are not limited to, foreign exchange rates, security and commodity prices, derivatives prices, as well as related factors such as interest rates, credit spreads, implied volatility or implied correlation. Non-tradable market parameters are derived from assumptions based on models or statistical analysis, such as correlations. Liquidity is an important component of market risk. In situations of scarce liquidity or absence of liquidity, goods or instruments may not be tradable at their estimated value. This may arise, for example, due to low transaction volumes, legal restrictions, or a one-way market.

Market risk primarily arises in trading portfolios, but may also exist in other portfolios containing assets held in connection with the banking business, such as:
- Equity holdings; or
- Some other assets: for very specific activities it also encompasses properties held for sale, real estate or cars to be leased, the risk of which is indirectly impacted by changes in the market value of these assets.

Risk Strategy and Measurement:
The Market Risk positions subject to capital charge requirement are:
• The risks pertaining to interest rate related instruments in the Banking as well as in Trading books.
• Foreign exchange risk throughout the Bank in both Banking and Trading books.

The Bank has a robust risk management system in place. Market Risk is continuously monitored and assessed by the Risk – Investment & Markets (R-IM) department. R-IM works as a part of the Group Risk Management Department. Market & Liquidity Risk for Indian books is monitored by India R-IM department who sits in Indian dealing room, in co-ordination with regional and global R-IM departments. R-IM contributes to the definition of the Bank's risk appetite, its risk decision making process and the optimisation of capital allocation

To maintain the neutrality in operations of the R-IM department for unbiased controls of Market Risk, the R- IM department is independent of front office and operations (back office & middle office) functions.

Mechanism for market Risk monitoring:
To ensure that the Market Risk is properly monitored and in line with the capital adequacy of the Bank, stringent market limits are placed on each business line within Fixed Income and ALM. The same include Cumulative Gapping limits, OYE limits, PV01 limits, VaR limits, Spread limits, Issuer Risk Limits etc. In addition to this, the limits as prescribed by the RBI are enforced. The Bank has various limits in place for monitoring of Market Risk.

The Market Risk of trading transactions in terms of sensitivities and VaR are system generated with no manual intervention. R-IM monitors the actual positions vis-à-vis the limits on a daily basis and report the same to the concerned heads of the business lines and regional R-IM departments.

In case of any excess, R-IM staffs will follow-up for the approval of the excess with the relevant approving authority or will instruct the business to reduce the position. R-IM will report any such excess to the regional business heads as well as to the Bank's management.

The Bank believes in strong assessment and estimation of the capital required to cover Market Risks arising from the business. The Bank has robust stress testing and back testing mechanisms to ensure that the capital adequacy is maintained.

Bank has a detailed Stress Testing Policy.

Quantitative Disclosure

a) Capital requirements for Market risk : (Figures as on 31st March 2013 and in Rs. Crore)
Standardized duration approach:

1) Interest rate risk: 303.57
2) Foreign exchange risk: 55.70
3) Equity risk: 0.001

Table 9
Operational risk

Qualitative Disclosure

a) **Operational Risk**:

Operational risk is the risk of incurring an economic loss due to inadequate or failed internal processes, or due to external events, whether these events are deliberate, accidental or natural occurrences. The management of operational risk is underpinned by an analysis of the cause - event - effect chain.
The internal processes may involve issues including human resources and systems. External events include but are not limited to floods, fire, earthquakes and terrorist attacks. Credit or market events such as default or a change in value that affects credit and market risks do not fall within the scope of operational risk.
Operational risk encompasses legal risk, tax risk, information system risk and compliance risks. However, due to its importance and connection with the reputation risk, compliance risk is addressed through a specific process.
According to the French regulation, the compliance risk is defined as the risk of legal, administrative or disciplinary sanctions, or financial loss that a bank may suffer as a result of its failure to comply with all the laws, regulations, codes of conduct, standards of good practice applicable to banking and financial activities or instructions given by the executive body, particularly the ones in application of guidelines issued by the Board of Directors.
By definition, this risk is a sub-category of operational risk. However, certain consequences of a compliance failure may imply more than a pure financial loss and harm the institution's reputation. The Bank has therefore set up a specific organization and process to manage the compliance risk.

Policies on Management of Operational Risks:

The Bank has framed Operational Risk Management Policy duly approved by the Board. Other policies adopted by the Bank which deal with management of Operational Risk are Know Your Customers (KYC) and Anti Money Laundering Procedures, IT Business Continuity and Disaster Recovery Plan (IT – BC DRP).

The Operational Risk management policy adopted by the Bank outlines organization structure and detail processes for management of Operational Risk. The basic objective of the policy is to closely integrate Operational Risk management system into day-to-day risk management processes of the Bank by clearly assigning roles for effectively identifying, assessing, measuring, monitoring and controlling / mitigating Operational Risks and by timely reporting of Operational Risk exposures, including material Operational losses. Operational Risks in the Bank are managed through comprehensive and well articulated internal control frameworks.

Table 10
Interest rate risk in the banking book (IRRBB)

Qualitative Disclosure

a) **Interest Rate Risk in the Banking Book:**

Interest Rate Risk in the Banking Book (IRRBB) is the risk of incurring an economic loss as a result of mismatches in interest rates, maturities or nature between assets and liabilities. For banking activities, IRRBB is measured in non-trading portfolios. For insurance activities, it also includes the risk of changes in the value of securities and other assets, particularly real-estate, held by the general investment fund of the company.

Interest Rate Risk in the Banking Book (IRRBB) is managed by the Bank on an ongoing basis. The Bank has identified the critical risks associated with the changing interest rates for its on and off-balance sheet items in the Banking book from a short-medium-long term perspective. In order to assess IRRBB, the Bank takes into account the impact of changes due to parallel shifts in yield curve, yield curve twists, yield curve inversions, changes in the relationships of rates (better known as basis risk) and other relevant scenarios. The Bank adequately supports its assumptions about the base characteristics of its non-maturity deposits and other assets / liabilities, especially those exposures characterised by embedded options. Given the uncertainty in such assumptions, stress testing is used as prime tool for assessing the impact of IRRBB.

The Bank has a detailed ALM policy. The ALM policy specifically deals with Liquidity Risk management and Interest Rate Risk management framework. As envisaged in the policy, liquidity is managed through the gapping module, based on residual maturity of assets and liabilities, on a daily basis The Bank has put in place mechanism of short-term dynamic liquidity management and contingent funding plan. Prudential limits are prescribed for different residual maturity time buckets for efficient asset liability management. Liquidity profile of the Bank is evaluated through various liquidity ratios. The Bank has also drawn various contingent measures to deal with any kind of stress on liquidity position. Bank ensures adequate liquidity managed on a real time basis by domestic treasury through systematic and stable funds planning.

The Asset Liability Management Committee (ALCO) monitors adherence of prudential norms fixed by the Bank and ALCO will decide, the interest rate structure of the asset & liability products. However, the individual pricing for any product may be determined by the respective heads of the business, within the framework of the structure determined by the ALCO & ALM Policy. The back office Group at the Treasury & Local Finance monitors adherence of prudential limits on continuous basis

Quantitative Disclosure

The increase (decrease) in earnings value and economic value (or relevant measure used by management) for upward and downward rate shocks according to management's method for measuring IRRBB, is Rs -13.74 crores.