# DISCLOSURE REQUIRED UNDER BASEL III NORMS

Table 1 Scope of Application

# **Qualitative Disclosure**

- (a) The Framework applies to BNP Paribas Indian Branches
- (b) BNP Paribas SA France has a 100% stake in BNP Paribas India Holding Private Limited which has an exempt CIC status and 20.01% stake in BNP Paribas Securities India Private Limited which is a broking entity. BNP Paribas India Holding Private Limited has a 100% stake in BNP Paribas India Consultancy Private Limited, which has an NBFC licence and has 79.99% stake in BNP Paribas Securities India Private Limited.
- (c) BNP Paribas SA France picked up a 100% stake in Sharekhan Limited. Sharekhan Limited is a broking entity with an NBFC subsidiary, Sharekhan Financial Services Private Limited.
- (d) Apart from consolidation of BNP Paribas India Consultancy Private Limited and Sharekhan BNP Paribas Financial Services Limited 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**

### **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, provision for unhedged foreign currency exposure & Investment reserve, Investment Fluctuation reserve & Revaluation reserve constitute Tier II Capital. Bank has not issued Hybrid debt instruments which are eligible to be included as Tier II Capital.

Capital Infusion for the Financial Year 2020-2021 is 'Nil'. (Financial Year 2019-2020 - Rs.831.74 crores).

Accordingly, we present in the Tables below the position of capital funds:

	Position as at March 3	1, 2021		
	Regulatory Capital as at March 31, 2021	% of RWAs as per Basel III	Capital Funds of bank (Rs. in Crores)	As a % of RWAs of bank
(i)	Minimum Common Equity Tier 1 Ratio	5.50	6,617.26	12.22%
(ii)	Capital Conservation Buffer (comprised of Common Equity)	1.875	1,014.99	1.88%
(iii)	Minimum Common Equity Tier 1 Ratio plus Capital Conservation Buffer [(i)+(ii)]	7.375	7,632.25	14.10%
(iv)	Additional Tier 1 Capital	1.50	0	0.00%
(v)	Minimum Tier 1 Capital Ratio [(i) +(iv)]	7.00	6,617.26	12.22%
(vi)	Tier 2 Capital	2.00	1,438.66	2.66%
(vii)	Minimum Total Capital Ratio (MTC) [(v)+(vi)]	9.00	8,055.93	14.88%
(viii	Minimum Total Capital Ratio plus Capital Conservation Buffer [(vii)+(ii)]	10.875	9,070.92	16.76%

# **Quantitative Disclosure**

(b) The breakup of Tier I Capital as on 31st March 2021 is as given below (Rs. in Crores)

1)	Remittance received from HO:	4,481.29
2)	Statutory Reserve:	977.44
3)	Capital Reserve:	14.40
4)	General Reserve:	35.31
5)	Remittable surplus retained	2,206.43
6)	Intangible assets	-82.62
	Total	7,632.25

- c) The total amount of Tier II Capital as on 31st March 2021: INR 1,438.66 crores
- d) Debt capital instruments eligible for inclusion in Upper Tier II Capital- NIL
- e) Subordinated debt eligible for inclusion in Lower Tier II Capital (Rs. in Crores)

1) Total amount outstanding:	889.16
Of which amount raised during the yea	r: 477.20
2) Amount retired during the year	403.25
3) Amount eligible to be reckoned as cap	ital funds 889.16

- f) Other deduction from capital, if any: Nil
- g) Total eligible capital as on 31st March 2021: INR 9,070.92 crores

#### **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.

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 has withdrawn the parallel run and prudential floor between Basel 1 and Basel 2 vide RBI Master Circular on Basel III Capital regulations DBOD.No.BP.BC.2 /21.06.201/2013-14 dated July1, 2013.RBI has vide circular DBOD.No.BP.BC.81/21.06.201/2013-14 dated Dec 31, 2013 made the CVA risk capital charge on OTC derivatives effective from April 1, 2014. Also, on account of significant exposure on account of unhedged foreign currency of entities, RBI vide its circular no DBOD No. BP.BC.85/21.06.200/2013-14 introduced incremental capital requirements for unhedged foreign currency exposure (over and above the present capital requirements) effective April 01, 2014.

The capital adequacy of the Bank is placed before its Management Committee on a monthly basis wherein the same is discussed and the adequacy of the same is elaborated keeping in view the future growth plan of the Bank. Management places a note to the Group office as and when a need is felt for additional capital infusion

In accordance with BASEL requirements, the Bank also has an Internal Capital Adequacy Assessment Process ICAAP) for BNPP India. The ICAAP depicts the various categories of risks to which the Bank is exposed, details the ongoing assessment of such risks, how risks are to be mitigated, and quantifies the amount of capital required currently and in the future to cope with these risks. The ICAAP is subjected to an independent review as required by RBI Guidelines and is reviewed annually.

# **Quantitative Disclosure**

	Capital Requirement Under Pillar 1 of Basel III- Rs. in Crores	March 31, 2021	March 31, 2020
(i)	For Credit Risk under Standardised approach	5,301.03	5,625.3
(ii)	For Market Risk under Standardised Duration approach		
	(details in the next table)	1,125.00	1,266.5
(iii			
)	For Operational Risk under Basic Indicator Approach	272.91	273.4
(iv)	Total Capital Requirement		
	(i)+(ii)+(iii)	6,698.94	7,165.2
(v)	Total Tier 1 capital ratio:		
	-for the top consolidated Group (Bank)	14.10%	13.03%
	-for significant bank subsidiaries : NA	-	-
(vi)	Total Tier 1 + Tier 2 Capital ratio		
	-for the top consolidated Group (Bank)	16.76%	15.01%
	-for significant bank subsidiaries: NA	-	-

# Further details of the capital requirement under Credit, Market and Operational Risk are provided in the Table below:

	Credit Risk	March 31, 2021	March 31, 2020
	(Rs. in Crores)		
(i)	Exposures to Banks, Financial Institutions & Corporates	5,301.03	5,625.30

	Market Risk	March 31, 2021	March 31, 2020
	(Rs. in Crores)		
(i)	Details of Market Risk capital requirement		
(a)	Interest Rate risk	999.70	1,141.10
(b)	Foreign exchange risk	125.30	125.30
(c)	Equity risk	-	0.10
	Total	1,125.00	1,266.50

# **Operational Risk**

Per the Basic Indicator approach for Operational Risk, the Bank is required to maintain capital at the rate of 15% of average gross income of previous three financial years. The notional risk weighted assets for operational risk is calculated by multiplying the operational risk capital charge by 12.5. The Capital required for operational risk is Rs. 272.91 crores (March 31, 2020: Rs. 273.40 crores).

#### Credit risk: General disclosures

#### **Qualitative Disclosure**

#### a) Credit Risk:

BNP Paribas- Indian Branches' credit risk categories in the ICAAP cover a wide range of credit risk types, as follows:

- -Classical credit risk
- -Counterparty risk

Classical Credit risk is defined as the potential that a bank borrower or counterparty will fail to meet its obligations in accordance with agreed terms. Evaluating accurately the probability of default and the expected recovery on the loan or receivable in the event of default are key components of credit quality assessment

Counterparty risk is the translation of the credit risk embedded in the market, investment and/or payment transactions. Those transactions include bilateral contracts (i.e. Over-The-Counter - OTC) which potentially expose the Bank to the risk of default of the counterparty faced.

#### **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.

The Bank also maintains general provision as a percentage of performing standard advances and on unhedged foreign currency exposures as prescribed by the RBI, to cover the inherent risk of losses. The credit portfolio is monitored and reported to Central Repository of Information on Large Credits (CRILC).in accordance to guidelines prescribed from time to time by RBI.

# **Quantitative Disclosure**

# a) Gross Credit exposure (Rs in crores)

Fund based:	13,207.05 (Gross advances)	
Non Fund based:	11,056.76 (Guarantees, LCs, Endorsement and Acceptances)	

# b) Geographic distribution of exposures (Rs in crores)

# **Domestic**

Fund based:	13,207.05
Non Fund based:	11,056.76

# International

Fund based:	Nil
Non Fund based:	Nil

# c) Industry wise distribution of exposure

(Rs. in crores)

(RS. II			
Industry Name	Funded Credit	Non Funded	Total Credit
		Credit	Outstanding
Mining	34.32	0.53	34.85
Food Processing	652.28	15.01	667.29
Beverages (excluding Tea & Coffee) and Tobacco	0.00	6.82	6.82
Textiles	13.00	0.00	13.00
Leather and Leather Products	-	-	-
Wood and wood products	-	-	-
Paper and Paper Products	151.03	-	151.03
Petroleum (non-infra), Coal products (non-mining) and Nuclear Fuels	104.85	-	104.85
Chemicals and chemical products (Dyes, Paints, etc.)	1,156.64	197.98	1,354.62
Rubber and Rubber Products	311.79	214.81	526.60
Glass & Glassware	89.49	22.56	112.05
Cement and Cement Products	-	301.44	301.44
Iron and Steel	65.26	20.91	86.17
Other Metal and Metal Products	135.64	59.01	194.66
All Engineering	1,671.92	629.92	2,301.85
Vehicles, vehicle Parts and Transport Equipment's	874.20	29.66	903.85
Construction	564.72	1.62	566.34
Infrastructure	1,309.82	1,197.14	2,506.96
Other Industries	287.27	54.18	341.45
Other Residuary Advances	5,784.83	8,305.16	14,089.99
Total Loans and advances	13,207.05	11,056.76	24,263.81

						Rs. in Crores
	Cash and Balances with RBI	Balances with other banks	Investments	Advances	Fixed Assets & Other Assets	Total
1 day	2.06	2,230.06	9,286.41	70.07	51.58	11,640.18
2-7 days	2,925.00	22.99	1,268.64	826.91	123.06	5,166.60
8-14 days	-	-	569.09	870.97	27.17	1,467.23
15-30 days	108.25	-	255.36	554.31	8.76	926.68
31 days to 2 months	49.65	-	817.85	478.49	9,120.92	10,466.91
Over 2 months and up to 3 months	132.37	-	410.46	417.34	47.59	1,007.76
Over 3 months and up to 6 months	30.56	-	657.16	456.47	110.12	1,254.31
Over 6 months and up to 1 year	22.26	-	774.39	145.33	92.04	1,034.02
Over 1 year and up to 3 years	143.64	0.05	1,363.57	8,475.51	28.94	10,011.71
Over 3 years and up to 5 years	10.78	-	55.43	674.69	255.19	996.09
Over 5 years	25.17	-	129.45	230.07	241.52	626.21
Total	3,449.74	2,253.10	15,587.81	13,200.15	10,106.89	44,597.69

# e) Amount of Gross NPAs (Rs. in crores)

Substandard	0.00
Doubtful 1	0.00
Doubtful 2	0.00
Doubtful 3	0.00
Loss	6.90

# f) Net NPAs – 0.00

# g) NPA Ratios

Gross NPAs to Gross Advances:	0.05%
Net NPAs to Net Advances:	0%

# h) Movement of Gross NPAs (Rs. in crores)

Opening balance:	6.90
Additions:	0
Reduction:	0
Write off:	0
Closing balance	6.90

All of the above NPAs are Micro Finance Institution under NBFC category.

# i) Movement of provisions for NPAs (Rs. in crores)

Opening balance:	6.90
Additions:	0.00
Reduction:	0.00
Write off	0.00
Closing balance	6.90

# j) Movement in General Provision for standard advances (Rs. in crores)

Opening balance:	115.34
Provisions made during the period	0.00
Write-off	0.00
Write back of excess provision	-21.12
Closing balance	94.22

# (k) General Provision for Covid-19 deferment cases:

The Bank holds the provisions as at March 31, 2021 against the potential impact of COVID - 19 based on the information available up to a point in time. Following are the details of such accounts and provisions made by the Bank (Rs. in crores):

Advances outstanding where	
Asset classification is extended	338.65
Provisions made as per para 5 of	
the COVID-19 Regulatory	
Package:	42.74

# (1) Amount of Non-performing investments: 4.23 crores

(m) Amount of provision held for Non-performing investments: 4.23 crores

(n) Movement of provisions for depreciation on investments (Rs. in crores)

Opening balance	0.00
Provisions made during the year	51.64
Write off	0.00
Write back of provisions during the period	0.00
Closing balance	51.64

#### 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 Basel III Framework. 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 domestic ECRAs namely Credit Analysis and Research Ltd. (CARE), CRISIL Ltd., India Ratings, Brickworks, Informerics, SMERA and ICRA Ltd. In consideration of the above guidelines, the bank has decided to accept ratings assigned by all these ECRAs.

Where the borrowers have not obtained a rating from the credit rating agencies the exposure is considered as unrated and appropriate risk weights are applied.

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 procured 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. (Rs in crores)

Particulars	Mar-21
Below 100% risk weight	46,818.23
100% risk weight	3,208.35
More than 100% risk weight	10,289.04
Deducted from capital	Nil

# Table 6 Credit risk mitigation

#### **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. Systems, processes and policies are critical components of our risk management capability.

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.

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), 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 realizable 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 2021 is Rs. 2,471.66 crores.
- B) Under the standardized Approach, the total credit exposure covered by guarantee / credit derivative as on 31st March 2021 is Rs. 1,041.40 crores.

#### Table 7

#### Securitisation disclosure

The Bank has not undertaken any securitisation and hence this disclosure is not applicable.

#### Table 8

Market risk in trading book

#### **Qualitative Disclosure**

### a) Market Risk:

Market risk is the risk of incurring a loss of value due to adverse trends in market prices or parameters, whether directly observable or not.

Observable market parameters include, but are not limited to exchange rates, prices of securities and commodities (whether listed or obtained by reference to a similar asset), prices of derivatives, and other parameters that can be directly inferred from them, such as interest rates, credit spreads, volatilities and implied correlations or other similar parameters.

Non-observable factors are those based on working assumptions such as parameters contained in models or based on statistical or economic analyses, non-ascertainable in the market.

#### **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 books subject to Fair value through Profit and Loss account (market making activity).
- Foreign exchange risk throughout the Bank in both Banking and books subject to Fair Value through P&L.

The Bank has a robust risk management system in place. The management Board reviews and approves our risk appetite and capacity on an annual basis, or more frequently in the event of unexpected changes to the risk environment, with the aim of ensuring that they are consistent with our Group's strategy, business and regulatory environment and stakeholder's requirements. Market Risk is continuously monitored and assessed by the Risk – Global Markets (R-GM) department. R-GM works as a part of the Group Risk Management Department. Market & Liquidity Risk for Indian books is monitored by India R-GM department who sits in Indian dealing room, in coordination with regional and global R-IM departments. R-GM 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-GM department for unbiased controls of Market Risk, the R-GM 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 ALMT (ALM Treasury). 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-GM 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-GM departments. In case of any excess, R-GM 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-GM 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.

The Bank has a detailed Stress Testing Policy. Monitoring, stress testing tools and escalation processes are in place for key capital and liquidity thresholds. The results of stress testing are included into our internal capital adequacy assessment process (ICAAP) which is submitted to the regulators.

# **Quantitative Disclosure**

a) Capital requirements for Market risk: (Figures as on 31st March 2021 and in Rs. Crore)

Standardized duration approach:

1) Interest rate risk:	999.70
2) Foreign exchange risk:	125.30
3) Equity risk	0.00
Total Market Risk capital requirement	1,125.00

# Table 9 Operational risk

## **Qualitative Disclosure**

## a) Operational Risk:

Operational and compliance risks come under a specific regulatory framework:

- •Directive 36/2013/UE (CRD 4) and Regulation (EU) No. 575/2013 (CRR) governing prudential supervision and the methods for calculating the amount of capital requirements to cover the operational risk;
- •French Ministry of Finance Decree of 3 November 2014, which defines the roles and responsibilities of the Risk Function (covering all types of risks) and an internal control system which ensures the efficiency and quality of the Bank's internal operations, the reliability of internal and external information, the security of transactions, as well as compliance with applicable laws, regulations and internal policies.

Banking regulation divides operational loss events into seven categories:

(i) internal fraud, (ii) external fraud, (iii) employment practices and workplace safety (such as an anomaly arising from recruitment management), (iv) clients, products and business practices (such as product defects, mis-selling, professional misconduct, etc.), (v) damage to physical assets, (vi) business disruption and system failures, (vii) execution, delivery and process management (data entry error, error in documentation, etc.).

Effective management of compliance risk aims to ensure compliance with applicable laws, regulations, rules of ethics and instructions, protect the Group's reputation, that of its investors and that of its customers, ensure ethical professional behaviour, prevent conflicts of interest, protect customers' interests and market integrity, fight against money laundering, bribery and the financing of terrorist activities, as well as ensure compliance with financial embargos.

### 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). Within the general management of operational risk, Fraud risk relevant aspects are part of self-assessment process.

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.

As per BIA, the capital requirement as on March 31, 2021 is Rs. 272.91 crores.

#### 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 is measured on the prudential Banking Book. The application of the European banking prudential framework to the IFRS-consolidated Group defines the Banking Group (excluding in particular insurance entities, for which interest rate risk is covered by capital held at the level of these entities) and divides it into a Prudential Banking Book and a Prudential Trading Book.

The Prudential Banking Book comprises essentially:

- •Banking intermediation activities such as Retail, financing and banking activities for corporates and financial institutions (including raising wholesale liabilities)
- •Banking corporate-like activities such as investments in equity in non-banking entities (including the participation in the insurance entities), own funds, premises and equipment
- •Transactions that are mitigating liquidity risk, interest rate risk, foreign exchange risk and credit spread risk derived from banking intermediation activities and banking corporate-like activities.

The Bank incurs interest rate risk in its Banking Book due to discrepancies in interest rate indices on which loans and deposits are indexed on. Indeed, the interest that the Bank receives on loans and pays on savings may be fixed or indexed on various reference rates (Eonia, Euribor, Libor...) and on different maturities. Hence, when interest rates move, the charges paid on savings and other liabilities on one hand, and the interest income received on loans and other assets on the other hand, do not vary, in general, in the same way with interest rates moves, generating changes on its earning. This risk is named Interest Rate Risk in the Banking Book (IRRBB).

#### **IRRBB Risk Management:**

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 characterized 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**

Under the Pillar III norms, the increase / decline in earnings and economic value for an upward / downward rate shock of 100 basis points and 200 basis points respectively as on March 31, 2021, broken down by currency is as follows:

# **Earnings Perspective**

(Rs. in crores)

Currency	Interest rate shock	
	1% Increase	1% Decrease
Rupees	(4.96)	4.96
US Dollar	7.09	(7.09)

# Economic Value Perspective

(Rs.in crores)

Currency	Interest rate shock	
	2% increase	2% decrease
Rupees	28.18	(28.18)
US Dollar	(2.27)	2.27

#### **Counterparty Credit Risk**

Counterparty risk is the translation of the credit risk embedded in the market, investment and/or payment transactions. Those transactions include bilateral contracts (i.e. Over-The-Counter - OTC) which potentially expose the Bank to the risk of default of the counterparty faced.

Counterparty risk identification is governed in BNP Paribas, including BNP Paribas- Indian Branches, according to the principles and practices that underlie classical credit risk identification. In particular, it shall be noted that concentration risks are jointly analysed for credit and counterparty risks when monitoring countries, industries or single names.

# **Management of Counterparty Risk**

The bank manages Counterparty Credit Risk (CCR) through continuous measuring and monitoring of risks at each obligor and portfolio level. Capital for CCR exposure is assessed based on Standardized Approach. The Bank does not have bilateral netting arrangements with other counterparties. The interbank trades in Government Securities, Interest Rate Swaps and Forex Forwards are settled through CCIL as a Central Counterparty. The bank participates in portfolio compression exercises conducted for netting off exposures to other inter-bank counterparties on OTC derivative trades that are subject to centralized settlement through Central Counterparties.

Bank also enters into financial instruments that are traded or cleared on an exchange for currency futures and options.

The outstanding balance as on March 31, 2021 and the derivative exposure calculated using Current Exposure Method (CEM) is provided below.

(Rs.in Crores)

Particulars	Notional Amounts	Current Exposure
Foreign Exchange Contracts	278,608.56	11,622.30
Interest Rate Swaps	456,420.65	7,317.38
Cross Currency Swaps	108,552.73	13,635.19
Currency Options	11,487.26	989.73
Forward Rate Agreement	4,101.53	121.61
Currency Futures	252.82	5.06
Total	859,423.55	33,691.27

## Leverage Ratio

The Basel III leverage ratio is defined as the capital measure (Tier-1 capital of the risk based capital framework) divided by the exposure measure, with this ratio expressed as a percentage.

As per RBI guidelines, disclosures required for leverage ratio for the Bank at March 31, 2021 are as follows:

Leverage Ratio	Rs. in Crores
Tier 1 capital	7,632.25
Total exposures	80,675.65
Basel III leverage ratio (per cent)	9.46%

#### **NSFR**

NSFR Ratio	Rs. in Crores
Panel I - Available Stable Funding (Sources of funds)	18,431.25
Panel II - Required Stable Funding (Uses of funds)	16,537.22
NSFR Ratio	111.45%

Particulars	Attachment
DF11 Capital Composition	DF11 Capital_Composition
DF12 Capital Composition and Reconciliation	DF12 Capital_Composition_
DF13 Main Features of Capital Instruments	DF13 Main_Features_of_Ca <sub>i</sub>
DF14 Terms & Conditions of Capital Instruments	DF14 Full Terms & Conditions of Regulat
DF 15 Remuneration	DF15 Disclosure for Remuneration Mar 21