BANK OF CEYLON (UK) LTD

Gateway to Sri Lanka

Capital & Risk Management
Pillar 3 Disclosures

31st December 2019

Company Registration no. 06736473

Contents

INTRODUCTION

Bank of Ceylon (UK) Limited ("BOCUK" or the "Bank") is a wholly owned subsidiary of Bank of Ceylon ("BOC"), a state-owned bank incorporated in Sri Lanka.

The international capital framework for financial institutions "Basel III" is structured around three "Pillars": Pillar 1, sets minimum capital requirements, Pillar 2, the arrangements for supervisory review, and Pillar 3, market discipline. The implementation of "Basel III" framework of the Basel Committee (Basel) is by way of the European Union (EU) amended Capital Requirements directive and Regulation "CRD IV" and in the Prudential Regulation Authority's (PRA) Rulebook for the UK banking industry.

In December 2017 Basel published revisions to the Basel III framework (Basel 3.1) which include:

- widespread changes to the risk weights under the standardised approach to credit risk;
- the replacement of the operational risk approaches with a single methodology; and
- an amended set of rules for the credit valuation adjustment (CVA) capital framework.

Basel announced that the package was to be implemented on 1 January 2022. On 27 March 2020 the Group of Central Bank Governors and Heads of Supervision announced a delay to the implementation of the Basel 3.1 standards by one year. This is intended to provide operational capacity for banks and supervisors to respond to the financial stability priorities from the impact of Covid-19. The PRA have adopted the revised implementation timetable. The final standards will need to be transposed into local law before coming into effect. The package contains a significant number of national discretions and the possible outcome is therefore uncertain.

As a result of the implementation of the decision of the referendum on 23 June 2016, the UK left the EU on 31 January 2020. In order to smooth the transition, the UK remains subject to EU law during an implementation period, which is expected to end on 31 December 2020. In preparation for the UK leaving without an agreement, a series of statutory instruments were made to transpose EU laws and regulations into UK law. It is anticipated that these will form the basis of the UK's regulations after the implementation period has ended.

Pillar 3 aims to encourage market discipline by developing a set of disclosure requirements that allow market participants to assess certain specified information on the scope of application of Basel III framework, particularly the risk exposures and risk assessment processes, and hence the capital adequacy of the institution.

These Pillar 3 disclosures are summary descriptions of the risk management processes of the Bank of Ceylon (UK) Limited and have been prepared in accordance with the adoption of the CRD IV regulations by the United Kingdom regulators, the PRA and FCA.

The information provided by the Bank under Pillar 3 is subject to the same level of internal review and internal control processes as the information provided by the Bank in its management discussion and analysis part of the financial report. The disclosures have been reviewed by the Bank's Audit and Risk Committee and approved by the Bank's Board of Directors. The Pillar 3 Disclosures have not been audited by the Bank's external auditors except where the information contained in the disclosures is equivalent to that included in the Bank's annual Financial Statements.

Pillar 3 disclosures in this document cover credit risks, market risks, and operational risks. There is additional information regarding risks in the Financial Statements and this disclosure document should be read in conjunction with the Bank's Financial Statements for the financial year ended 31 December 2018. Unless otherwise stated, all figures are as at 31 December 2018.

The Bank has adopted the standardised approach to credit risk and the basic indicator approach to operational risk. The Bank does not operate a trading book and the CRD IV own funds requirements for market risks have been adopted.

Activities and Scope

BOCUK undertakes deposit-taking business and also provides retail and corporate clients with a suite of banking services as well as offering a range of trade finance facilities, unregulated buy to let mortgages and correspondent banking; it does not operate a trading book. BOCUK does not have any subsidiaries or associates.

Regulatory framework for disclosures

BOCUK is supervised by the PRA which receives information of the capital adequacy of, and sets capital requirement for, the Bank.

Accounting developments

IFRS 9 Financial Instruments

BOCUK adopted the requirements of IFRS 9 Financial Instruments on 1 January 2018.

The IFRS 9 classification of financial assets and the recognition and measurement of expected credit losses (ECL) differ from the previous approach under IAS 39 and IAS 37.

The adoption of IFRS 9 has not resulted in any significant change to the Bank's business model.

For regulatory reporting the Bank has adopted the transitional arrangements published by the EU on 27 December 2017. These permit banks to add back to their capital base a proportion of the impact IFRS 9 has on their loan loss allowances during the first five years of use. The proportion that banks may add back is 85% during 2019 and reduces to 25% by 2022.

Basis and frequency of disclosures

In accordance with PRA requirements BOCUK will publish Pillar 3 disclosures at least annually. The disclosures are available on the Bank's website: www.bankofceylon.co.uk.

Key metrics

	31 December 2019	31 December 2018
Available Capital (£000s)		
Common equity tier 1 ("CET1") capital	13,569	13,393
CET1 capital as if IFRS9 transitional arrangements had not been applied	13,458	13,347
Total capital	13,569	13,393
Total capital as if IFRS9 transitional arrangements had not been applied	13,458	13,347
Risk weighted assets (£000s)		
Total RWAs	23,604	24,492
Total RWAs as if IFRS 9 transitional arrangements had not been applied	23,604	24,492
Capital ratios (%)		
CET1	57.5	46.9
CET1 as if IFRS 9 transitional arrangements had not been applied	57.0	46.8
Total capital	57.5	46.9
Total capital as if IFRS 9 transitional arrangements had not been applied	57.0	46.8
Additional CET1 buffer requirements as a percentage of RWA (%)		
Capital conservation buffer requirement	2.50	1.88
Countercyclical buffer requirement	0.53	0.45
Total of bank CET1 specific buffer requirements	3.03	2.33
CET1 available after meeting the Bank's minimum capital requiremets[1]	48.3	35.4
Total capital requirement (%)[2]		
Total capital requirement	12.2	11.5
Leverage ratio		
Total leverage ratio exposure measure (£000s)	39,619	28,733
Leverage ratio (%)	34.2	46.6
Leverage ratio as if IFRS 9 transitional arrangements had not been applied (%)	34.0	46.5
Liquidity Coverage Ratio ("LCR")		
Total high quality liquid assets (£000s)	131,851	130,130
Total net cash outflow (£000s)	118,123	116,560
LCR ratio (%)	112	111

[1] The minimum requirements include the total capital requirement to be met by CET1, comprised of the Pillar 1 and Pillar 2A requirements set by the PRA.
[2] Total capital requirement is defined as the sum of Pillar 1, Pillar 2A, and CRD IV capital requirements.

THE RESPONSIBILITY OF THE BOARD AND BOARD SUB COMMITTEES

The Board

Decision making responsibility at BOCUK rests ultimately with the Board of Directors. The Board is responsible for strategic direction and overall control of the Bank and for its compliance with all laws and regulations. The Board monitors and reviews overall performance and ensures that all the activities are in line with the Bank's overall objectives, risk-return philosophy and regulatory rules.

The Board meets on at least a quarterly basis and receives reports from the Bank's senior management highlighting any changes to the Bank's risk profile.

The Board has delegated certain powers and responsibilities to sub-committees.

When delegating responsibilities, a number of principles are met and documented through formal committee terms of reference or role descriptions but may also be incorporated in control frameworks or procedures.

The Board considers that the risk management systems in place are adequate and aligned to the profile and strategy of the Bank.

The Board is structured as follows:-

- Chief Executive Officer
- Chief Operating Officer
- Two independent non-executive directors
- Two non-independent non-executive directors (nominated by the 100% shareholder, Bank of Ceylon, Sri Lanka)

All appointments are made on merit in line with a policy covering directors' appointment, induction, appraisal and professional development.

As at 31st December 2019 the Board consisted of the following membership:-

Name	Designation	Number of other directorships
S Sabesan	Chief Operating Officer and acting Chief Executive Officer	0
C N Meneripitiyage Don	Chief Executive Officer designate (pending regulatory approval)	0
W. D. R. Swanney	Independent Non-Executive Director and acting Chairman	2
R. England	Independent Non-Executive Director	1
K. B. S. Bandara	Non-Executive Director	13

Board Sub-Committees

Audit and Risk Committee

The Audit and Risk Committee (ARC) comprises two Independent Non-Executive Directors and is responsible for overseeing the Bank's adherence to the policies set by the Board. The ARC has the authority to investigate any activity within its terms of reference and all employees are directed to cooperate as requested by members of the ARC. The ARC is authorised by the Bank's Board to obtain outside legal or other independent professional advice as necessary to assist the ARC to fulfil its remit.

Its more detailed responsibilities include the examination and approval of the manner in which executive management ensures and monitors the adequacy and effectiveness of the process for the identification, assessment, mitigation, monitoring and management of all risks including liquidity, market, credit, operational, legal and strategic risks, the review of the internal audit scope and annual programme, the review of the external audit scope and the analysis of audit reports and proposals to amend operating procedures.

The ARC met five times in 2019.

Asset and Liability Committee

The Asset and Liability Committee (ALCO) recommends and oversees the strategies, controls and system support for the effective management of the assets and liabilities of BOCUK. It reviews the Bank's liquidity and funding profiles, ability to borrow and lend in the inter-bank market and defines the strategies for the deposit base. The ALCO sets limits for liquidity, funding, interest rate, foreign exchange and market risk within the Bank's overall risk appetite and reviews capital allocations to reflect business strategy and risk appetite. It recommends the Bank's liquidity policy statement, its Individual Liquidity Adequacy Assessment Process (ILAAP), its Internal Capital Adequacy Assessment Process (ICAAP), the Bank's Pillar 3 disclosures and its trading book policy statements to the Board.

Credit Committee

The Credit Committee is responsible for the effective management of all credit related risks at the Bank. It reviews all advances granted by the Bank and approves specific loans within the authority delegated to it by the Board. The Credit Committee reviews credit events and assesses their impact on the credit portfolio and where relevant, develops action plans to address those events. It is responsible for ensuring the maintenance of strong internal credit risk controls, the management of credit concentration risk and the approval of new credit products and processes.

Executive Committee

The Executive Committee deals with the day-to-day running of the business and any related issues as they arise and has been delegated authority by the Board to take whatever steps are necessary to conduct the business of the Bank within the confines of the Board approved strategy, risk appetite, policies, operating plans and budgets.

The Executive Committee monitors and assesses both the performance of all divisions of the Bank to ensure alignment with the Board's approved strategy and the likely impact of the external environment including competitor activity and performance, market trends and regulatory developments, on the achievement of that strategy. It monitors compliance issues including anti-money laundering activities and metrics demonstrating that the Bank is achieving its desired outcomes for “Treating Customers Fairly”.

RISK MANAGEMENT OBJECTIVES AND POLICIES

The major risks BOCUK faces comprise credit risk, market risk and operational risk, but BOCUK recognises that the range of risks is broader and ever changing and ensures that appropriate processes are in place for risks to be properly identified, assessed, treated, monitored and communicated.

The oversight of risk is exercised by the Board as a whole, supported by the Head of Risk (who also reports to the ARC). In particular, the Head of Risk is responsible for assessing the impact on BOCUK’s risk appetite of any changes in circumstances (internal or external).

BOCUK’s risk appetite statement sets out the level of risk that it is willing to take in pursuit of its business objectives. This document has been built-up following extensive discussions among the executive management and provides an articulation of tolerance for risk in both quantitative measures and qualitative terms. The risk appetite statement is formally reviewed on an annual basis by the Board as part of the rolling review of BOCUK’s medium term strategy and is used in mapping key risks, assessing their materiality and ultimately underpinning BOCUK’s overall risk management framework.

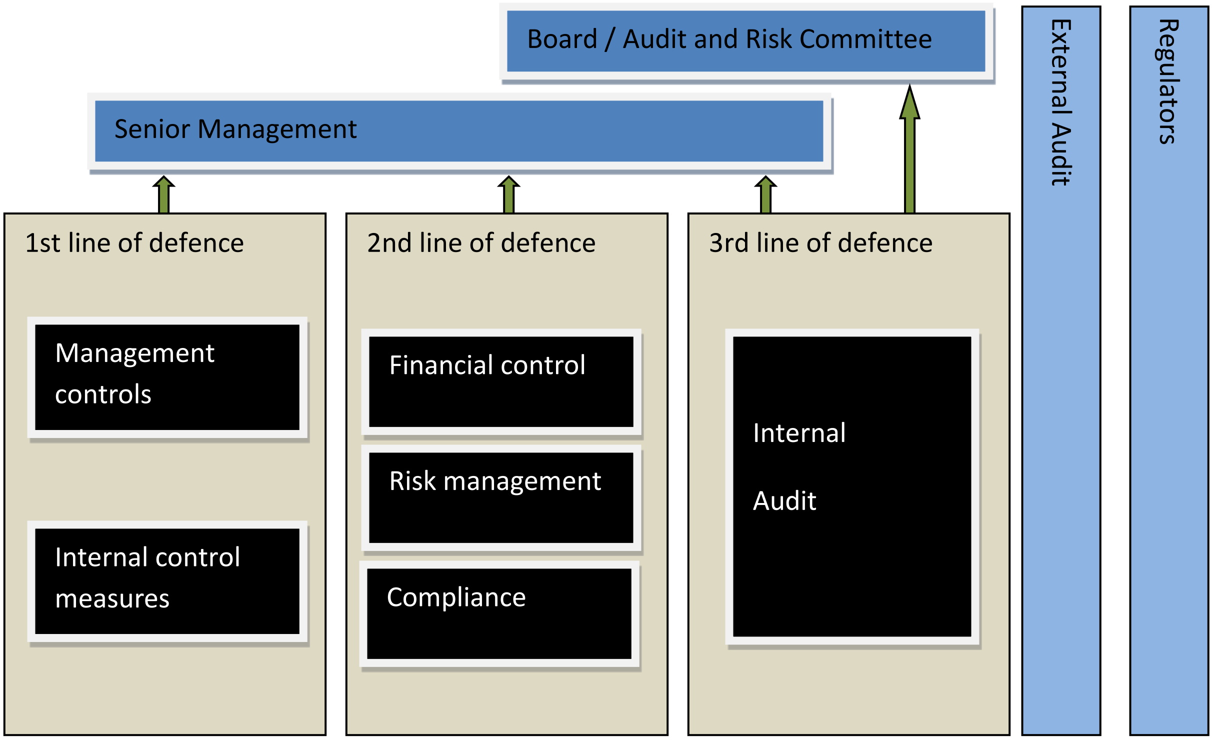
The Board also agrees the Bank’s ICAAP and its ILAAP which provide a framework to have in place sufficient capital, liquidity and funding to support the business activities and risk exposures. The Bank’s management formulates a business plan within the agreed risk tolerances. This plan is agreed by the Board.

The Board of the Bank adopts a prudent approach when deciding upon its appetite for risk in order to take a long-term view of value creation.

The high level approach taken by BOCUK to measure monitor and control risk is set out below.

RISK MANAGEMENT FRAMEWORK

BOCUK has chosen to adopt the three lines of defence model as its risk framework. Primary responsibility for the identification, control, monitoring and mitigation of risk lies with the operational areas (first line of defence). Oversight and governance are provided through risk, financial control and compliance functions and dedicated internal risk committees (second line of defence). Finally, assurance is provided by Internal Audit and overseen by the ARC (third line of defence). A summary of the framework is provided in the sections below.



First line of defence - organisation

Front office and client facing staff of BOCUK are primarily responsible for identifying and managing the risks that occur in the course of their daily roles in their business areas. Front office staff are required to contribute to developing policies, guidance and procedures that are necessary to manage risks and communicate these effectively to team members and other parties.

Second line of defence – management

The second line of defence is made up by the risk oversight functions and committees.

Treasury Back Office - the back office team will, as part of their role, identify potential risks resulting from the front office activities, alert front office to these risks and take action to mitigate them.

Head of Finance and Treasury – The Head of Finance and Treasury will monitor BOCUK's liquidity position and market risk position and will produce reports for senior management on the Bank's liquidity, funding and market risk management.

Head of Risk – the Head of Risk is responsible for developing, implementing and embedding the risk management procedures used by the Bank to identify, assess, monitor, control and mitigate the risks in BOCUK. The Head of Risk is also required to provide risk advice to senior management and the Board as required.

Head of Compliance – the Head of Compliance is required to develop, implement and encourage high compliance standards, policies and procedures, and ensure that these are adhered to through effective monitoring. The Head of Compliance is also required to provide compliance advice to senior management and the Board as required.

ALCO – the Bank's ALCO is responsible for monitoring and overseeing capital management, liquidity management (for both assets and liabilities) and the market risks faced by BOCUK. The ALCO is charged with approving and recommending the policy statements developed in these areas, establishing strategies for effective asset and liability management, setting capital, liquidity and market risk limits and monitoring exposures.

Credit Committee – the Bank's Credit Committee has responsibility for overseeing management of any credit risk assumed by any part of BOCUK's business. The Committee agrees and recommends the credit and concentration risk policies to the Board for approval and also approves customer and counterparty credit limits and facilities within the amounts delegated to it by the Board. The Credit Committee also monitors credit risk reports and arrears. The Committee has responsibility to review credit events, assess their impact and provide recommendations for further action.

Third line of defence - assurance

The Board looks to the Internal Audit function to provide independent assurance in respect of the operations of BOCUK. The ARC is also in place as a reporting line for Internal Audit, reviewing the function and its findings on a periodic basis.

Internal Audit is an independent, objective assurance activity that brings a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance. This involves ensuring that controls are in place and in accordance with the Bank's policies and procedures and that the Bank's records and reports are accurate and reliable.

In addition, the external auditors provide comfort to the shareholder, the regulators and other third parties in respect of the statutory financial statements.

CAPITAL RESOURCES

Own funds

BOCUK is funded by £15,000,000 share capital subscribed by the parent company. As at 31 December 2019 the composition of regulatory capital was as follows

Capital Resources	**31 December 2019**
Common Equity Tier 1 Capital (CET1)	**(£000)**
Share capital	15,000
Fair value reserve	0
Revaluation Reserve	408
Cumulative revenue losses	(1,932)
	13,476
Plus: IFRS 9 transitional arrangements	111
Less: Intangible assets	(18)
Common Equity Tier 1 capital	**13,569**
Common Equity Tier 1 ratio[1]	**57.5%**

[1] Calculated as total CET1 capital divided by risk weighted assets.

CAPITAL MANAGEMENT AND INTERNAL CAPITAL ADEQUACY ASSESSMENT PROCESS

BOCUK has documented a forward-looking business plan and financial projections as part of the rolling three year planning approved by the Board. BOCUK uses these projections, together with historic results, in the development and periodic review of the Internal Capital Adequacy Assessment Process (ICAAP) document to consider the level of capital it requires and to identify the sources of additional capital if necessary. This internal assessment makes use of the regulatory capital calculator and an internal evaluation of all other material risks that do not require the provision of regulatory capital. The ICAAP is performed annually or more frequently should the need arise. The outcome of the ICAAP covers all material risks identified by the Bank to determine the capital requirement over a three-year horizon, and includes stressed scenarios.

BOCUK has calculated the capital that it believes is necessary to hold in respect of the risks it faces. This comprises:

- Capital held in respect of Pillar 1 risks;
- Capital held in respect of Pillar 2A and 2B risks; and
- If required, additional capital held in respect of potential risks highlighted by stress tests.

These are recalculated at each review of the ICAAP. Where capital is deemed as not being an appropriate mitigant for a particular risk, alternative management actions are developed.

The ICAAP is presented to the Executive Committee, the ARC and then to the Board (with whom ultimate responsibility lies) for challenge and approval. The PRA periodically undertakes a supervisory review of the Bank's overall financial adequacy and sets Individual Capital Guidance (ICG) for the Bank.

Regulatory and internal capital adequacy is monitored and reported to the Board and Executive Committee. An assessment of the impact on internal and regulatory capital adequacy is made before launching any new products or undertaking new activities.

As part of the ICAAP process the Board has identified a number of other risks faced by the Bank which do not attract capital under the Pillar 1 rules. The Bank has allocated additional capital requirement for these additional risks referred to as Pillar 2A. The Bank is also exposed to risks to which it may become exposed over a forward-looking planning horizon (e.g., due to changes in the economic environment) referred to as Pillar 2B. The total capital requirement of the Bank is the sum of the Pillar 1 and the Pillar 2 capital requirements. In the view of the Bank the excess of capital resources over and above its Pillar 1 and Pillar 2 capital requirements was sufficient to meet its capital needs.

MINIMUM CAPITAL REQUIREMENT – PILLAR 1

The Bank's overall minimum capital resource requirement under Pillar 1 is calculated by adding the credit risk charge (standardised approach) to that required for market risk and the operational risk element (basic indicator approach).

Own funds Requirement	**31 December 2019**
	(£000)
Credit risk (standardised approach)	1,888
Market risk (standardised approach)	7
Operational risk (basic indicator approach)	335
Total Pillar 1 Requirement	**2,230**

Credit Risk

Credit risk is the risk arising from an event that causes an asset (including off-balance sheet transactions) to lose value or become worthless resulting from an obligor's failure to meet the terms of a contract with BOCUK or its failure to perform as agreed. BOCUK is exposed to credit risk through some of its banking activities, in particular, through its trade finance activities, money market activities and lending businesses. BOCUK uses the Standardised Approach to calculate its credit risk regulatory capital component. The risk weights applicable to each business vary according to the credit rating of each exposure.

BOCUK has a detailed Credit Policy setting out strict controls over credit risk related activities and an operating model with information on how the credit risk management processes are embedded in the business and are overseen within the Bank.

Counterparty risk relates to a firm's trading book and is the risk that the counterparty to the transaction could default before settlement. BOCUK does not have a trading book but may incur counterparty risk to the extent that it enters into spot or forward foreign exchange transactions with firms.

At 31 December 2019 the Bank's minimum capital requirement for credit risk under the standardised approach (being 8% of the risk weighted exposure amounts for each of the applicable credit risk exposure classes) comprised:

Own Funds Requirement at 8%	**31 December 2019 (£000)**
Central Governments and Central Banks	401
Institutions	173
Financial corporations	223
Corporates	398
Mortgages	316
Retail	130
Others	247
Total Pillar 1 Capital Requirement	**1,888**

Net values of on-balance sheet and off-balance sheet credit risk exposure (based on the definitions for regulatory capital purposes, before credit risk mitigation) and the average for the period to 31 December 2019 are summarised as follows:

Net credit risk exposure	**31 December 2019 (£000)**	**Average over the period (£000)**
Central Governments and Central Banks	136,809	123,360
Institutions	10,788	4,174
Financial corporations	2,817	6,449
Corporates	4,978	4,914
Mortgages	11,285	9,698
Retail	1,624	1,003
Others	3,135	3,103
Net credit risk	**171,436**	**152,701**

Past due loans are loans on which payments are overdue including those with partial payments being made or loans and advances net of any impairment provision where the Bank has assessed that the loan is impaired.

All corporate exposures were classified as SME exposures.

The residual maturity of the exposures at 31 December 2019 on a contractual basis was as follows:

Gross credit risk residual maturity	**0-3 Months**	**3-12 Months**	**Over 12 months**
	(£000)	**(£000)**	**(£000)**
Central Governments and Central Banks	131,800	1,721	3,288
Financial Institutions	10,788	-	-
Financial corporations	2,361	456	-
Corporates	496	-	4,482
Retail	171	-	1,453
Secured by mortgages on immovable property	-	527	10,758
Past due loans	-	-	-
Other	77	-	3,058
Gross credit risk	**145,693**	**2,704**	**23,039**

The geographic distribution of the exposures at 31 December 2018 was as follows:

Geographic credit risk exposure	**31 December 2019**	**31 December 2019**	**31 December 2019**
	United Kingdom	**Other European**	**Other**
	(£000)	**(£000)**	**(£000)**
Central Governments and Central Banks	131,800	-	5,009
Financial Institutions	10,476	86	226
Financial Corporations	-	-	2,817
Corporates	4,978	-	-
Mortgages	11,285	-	-
Retail advances	1,624	-	-
Others	3,135		
Gross credit risk	**163,298**	**86**	**8,052**

In November 2017 the Bank of England Financial Policy Committee (FPC) announced that the United Kingdom Countercyclical Capital Buffer (CCyB) would increase from 0.5% to 1% with effect from 28 November 2018.

In April 2019 the Haut Conseil de Stabilité Financière (HCSF) announced that the French CCyB would increase from 0.25% to 0.5% with effect from 2 April 2020.

In March 2020 both the FPC and the HCSF reduced the CCyB rates for the UK and France respectively to 0% as a response to the economic disruption resulting from Covid-19.

As at 31 December 2019 the Bank did not have any other country exposures that would give rise to a requirement to maintain a CCyB.

The financial institution and sovereign exposure values associated with each credit quality step, for credit exposures in accordance with the CRD IV credit quality assessment scale under the standardised approach, were as follows:

Exposure type	Credit Quality Step	External Credit Rating	Risk weight	31 December 2019 (£000)
Central governments and central banks	1	Aa1	0%	131,800
	5	B2	100%	5,009
Institutions	1	Aa3	20%	10,684
	2	A1	20%	104
Financial corporations	5	B3	150%	440
	Unrated	Unrated	100%	2,377

All assets are unencumbered.

For risk weighting purposes external credit ratings provided by Moody's have been used.

Impairment provisions

From 1 January 2018 a new accounting standard, IFRS 9, became effective which prescribes rules for measuring impairment allowances for financial assets. Under the IFRS 9 accounting standard businesses are required to assess and recognise Expected Credit Losses (ECL) on financial assets from the point of origination or purchase and to update the assessment at each reporting date reflecting changes in the credit risk of the financial asset. ECL represents the present value measure of the credit losses expected to result from default events that may occur during a specified period of time. ECLs must represent the present value of cash shortfalls. Given ECLs take into account both the amount and timing of payments a credit loss may result if a contractual payment is missed or received late, even if the debt is ultimately repaid in full. ECL assessments must reflect an unbiased and probability weighted assessment of a range of possible outcomes, including reasonable and supportable information about future economic conditions.

Exposures must be assessed and assigned to one of the following populations at each reporting point:

- Stage 1 – Performing risk assets
- Stage 2 –Significantly deteriorated risk assets
- Stage 3 – Credit impaired risk assets.

The Bank's approach to IFRS 9 ECL and staging is more fully explained in the notes to its 2019 Financial Statements.

At the 31 December 2019 IFRS 9 classifications were as follows:

Financial Assets December 2019 GBP 000s	Stage 1	Stage 2	Stage 3	Total	IFRS 9 provision
Cash in hand	52	-	-	52	-
Bank balance (nostros)	718	-	-	718	(0)
Retail loans	1,451	-	-	1,451	-
Business loans	1,463	3,000	-	4,463	-
Buy-to-let mortgages	10,134	878	-	11,012	(14)
Overdrafts	667	-	23	690	(23)
Money Market	143,785	-	-	143,785	(21)
Bills discounted	161	-	-	161	(0)
Investments	4,891	-	-	4,891	(94)
Total financial assets	**163,322**	**3,878**	**23**	**167,223**	**(153)**

One credit exposures had been classified as Stage 3 credit impaired and a full impairment provision was already in place under IAS39.

Market Risk

Market risk is the risk that arises from fluctuations in values of, or income from, assets, interest, exchange rates or market prices of commodities. BOCUK is exposed to changes in foreign exchange rates and incurs foreign exchange risk as a natural result of mismatched positions in the currencies in which it transacts business. BOCUK has set a prudent internal net open overnight FX limit. The foreign exchange position at 31 December 2019 comprised:

Position in Sterling Equivalent	**GBP £000**	**EUR £000**	**USD £000**
Total assets	152,247	887	17,151
Total liabilities and equity	(152,500)	(986)	(16,799)
Gross exposure	(253)	(99)	352
Foreign exchange contracts	-	-	-

Net exposure	**(253)**	**(99)**	**352**

At 31 December 2019 a 5% strengthening of Sterling against the US Dollar would have decreased profits by £17,700 and a 5% weakening of Sterling would have had an equal but opposite effect.

BOCUK is also exposed to interest rate risk in its banking book as a result of mismatches in the timing of interest rate resets of assets and liabilities.

Position in Sterling Equivalent	**0-3 Months**	**3-12 Months**	**Over 1 Year**	**Non-Interest Bearing**
	£000	**£000**	**£ 000**	**£000**
Total assets	161,392	1,757	3,204	3,932
Total liabilities and equity	(129,784)	(17,811)	-	(22,690)
Net interest gap	31,608	(16,054)	3,204	(18,758)
Cumulative interest gap	**31,608**	**15,554**	**18,758**	

At 31 December 2019 a parallel shift increase of 1.0% in interest rates would bring additional income of £187,580 in a full year. A 0.25% reduction in rates would have a negative impact of £41,716 on income.

Operational Risk

Operational risk is the risk of direct or indirect loss resulting from inadequate or failed internal processes, people and systems, or from external events arising from day-to-day operating activities. Operational risk is the second largest component of the BOCUK's Pillar 1 requirement.

The operational risk requirement under Pillar 1 is calculated using the Basic Indicator Approach. This uses a proxy of 15% of the average of 3 year net interest income and net non-interest income to calculate a capital charge for operational risk.

ADDITIONAL CAPITAL REQUIREMENT – PILLAR 2A AND B

Certain risks that BOCUK encounters are either not considered under Pillar 1 (minimum capital requirements), or are considered under Pillar 1 but are not fully captured by the Pillar 1 process. These are the additional Pillar 2A risks to which BOCUK is exposed.

Where it is considered appropriate to hold additional capital in respect of a risk, this is set out net of the mitigation resulting from controls and management actions. BOCUK's Pillar 2 add-on amount is the sum of the additional capital held in respect of each of these. Even where risks are considered material, this may not result in BOCUK holding additional capital against them as it may be appropriate to mitigate each risk using another mechanism, for example a robust control or management action.

In addition, as part of the ICAAP risk assessment process, BOCUK undertakes stress testing and scenario analysis based on available trading data at business unit level, the projections and assumptions made by management, and considers whether additional capital would be required over and above the Pillar 1 and Pillar 2A amounts identified in this section if a significant event occurred .

The following are considered or each of the key Pillar 2 risks identified:

- Risk characteristics and how the risk might affect BOCUK;
- Likelihood of crystallisation of risk (net of controls);
- Whether the capital held under Pillar 1 in respect of that risk is sufficient;
- How the risk will be mitigated at BOCUK:

The specific Pillar 2A risks considered in addition to Pillar 1 risks are detailed below.

Pillar 2A - Additional Risk Capital

Credit Risk

Although credit risk is primarily considered under Pillar 1, BOCUK has considered the credit risks that it takes and whether the level of capital held under Pillar 1 is sufficient.

Credit risk is the largest component of BOCUK's Pillar 1 capital requirement. BOCUK believes that the risk weights applied under the Pillar 1 calculations are conservative and reflect the risk of the exposures effectively. In addition, the Board considers the internal control arrangements of BOCUK are adequate given that the transactions that BOCUK will undertake are well understood and non-complex.

Concentration Risk

Concentration risk relates primarily to credit risk, and is the risk of an unexpected accumulation of credit related losses as a result of a lack of diversification of a credit portfolio. Pillar 1 risk weights are based on a highly diversified portfolio and BOCUK's regional focus on the Sri Lankan corporate and retail community means risk is likely to be relatively concentrated. An external shock that affects one exposure has a greater than usual chance of affecting other credits, and difficulties experienced with one exposure may affect directly or indirectly, another of the bank's exposures; and a failure of one credit may lead to a failure of another.

Operational Risk

Although operational risk is primarily considered under Pillar 1, BOCUK has considered the level of operational risks that it takes and therefore whether the level of capital held under Pillar 1 is sufficient. Where BOCUK identifies specific operational risks against which it believes it is necessary to hold capital, it considers the greater of this and the Pillar 1 amount, rather than their sum. The major risks faced by BOCUK are considered to comprise:

- Systems and controls

- Operational errors and external fraud
- Key man / staff
- Regulatory / legislative change

Interest Rate Risk

Interest rate risk arises from the possibility that changes in interest rates will affect future profitability or the fair value of financial instruments. Interest rate risk at BOCUK is largely limited to the impact on interest free funds but may increase as the range of products expands. Positions are monitored and managed by Treasury Department under the oversight of ALCO.

Other Risks

BOCUK reviews all risks to which the Bank is exposed, including but not restricted to pro cyclicality business risk, reputational and group risk, regulatory risk, legal risk, conduct risk, technological risk, and money laundering risk.

Pillar 2B - Additional Risk Capital

As part of the ICAAP the Bank considers the amount of capital over and above the Pillar 1 and Pillar 2A requirements that should be maintained in non-stressed conditions as a mitigation against future possible stress periods.

Capital conservation buffer

The capital conservation buffer is designed to ensure that institutions build up capital buffers outside of times of stress that can be drawn upon if required. The requirement is 2.5% of RWAs and has been phased in from 2016 in steps of 0.625% per annum to the full value in 2019. As of 31 December 2018, the capital conservation buffer was 1.875%.

Countercyclical capital buffer (CCyB)

The CCyB is designed to require financial institutions to hold additional capital to reduce the build-up of systemic risk in a credit boom by providing additional loss absorbing capacity and acting as an incentive to limit further credit growth.

Each institution's specific countercyclical buffer rate is a weighted average of the countercyclical capital buffers that apply in the jurisdictions where the relevant credit exposures are located. The Financial Policy Committee (FPC) is responsible for setting the UK CCyB rate (for credit exposures located in the UK), and has indicated that this will be set at 1% in normal economic conditions. As of 31 December 2019 the UK CCyB was maintained at 1%. In March 2020 the FPC reduced UK CCyB to 0% as one of the measures to counteract the economic impact of the Covid-19 crisis.

COVID-19

On 30 January 2020 the World Health Organisation declared the Coronavirus (Covid-19) outbreak to be a public health emergency of international concern.

The unprecedented measures taken to limit the impact of the Covid-19 pandemic have resulted in significant economic and social disruption.

- The Bank has forecast that this will translates into a significant short-term financial impact on the Bank.
- While the anticipated reduction in economic activity associated with Covid-19 could be sharp and large it could rebound sharply when measures are lifted.
- The UK and other governments and central banks have put in place substantial measures to support businesses and households.
- The approach to the assessment of the Bank's regulatory capital and liquidity must take into account the extraordinary circumstances and the potential for an early recovery.
- It is considered that the Bank has sufficient capital and funding resources to withstand the short-term impact of the Covid-19 disruption and to continue with its medium-term business strategy.

The UK Government has introduced measures to control the spread of Covid-19 by reducing individuals' day-to-day contact with other people. One of the requirements is for people to stay at home except in very limited circumstances. This includes a restriction on travelling to work where it is not possible to work from home.

- The Bank's main considerations are for the safety and wellbeing of its employees and the delivery of critical services to its customers.
- The Bank has in place comprehensive plans for dealing with disruptions such as those caused by the Government's Covid-19 measures.
- In order to meet the Government's measures the Bank's offices have been closed to the public and all members of Bank staff are working remotely using secure communications channels that were in place for such an eventuality.
- Individuals who work in financial services and are needed for the provision of essential financial services are classified by the Government as "key workers". The Chief Executive Officer of the Bank has identified those key workers within the organisation and these staff are permitted to travel to the office from time-to-time to ensure the delivery essential services.
- It is considered that the arrangements in place for remote working allow the Bank to continue its business and to deliver services to its customers with minimum disruption during the Covid-19 travel restrictions.

The PRA and FPC have previously, on several occasions, stated that all elements of capital and liquidity buffers exist to be used as necessary to support the economy. During the time of Covid-19 related disruption the PRA expects banks to focus on continuing to service and support their customers and clients and to use their liquidity and capital buffers in doing so. If a bank plans to utilise its buffers it should notify the PRA. This will be viewed as part of its usual supervisory communication and would include a discussion about the plan to restore its buffers. As at May 2020 the Bank has not utilised any Pillar 2 liquidity or capital buffers and maintains the buffers above the PRA's minimum expectations.

LEVERAGE RATIO

The leverage ratio is defined as the ratio of Tier 1 capital to total exposure. This metric is a non-risk based measure used to manage the risk of excessive leverage.

At its Policy meeting on 20 September 2017, the FPC recommended to the PRA that its rules on the leverage ratio:

(i) exclude from the calculation of the total exposure measure those assets constituting claims on central banks, where they are matched by deposits accepted by the firm that are denominated in the same currency and of identical or longer maturity; and

(ii) require a minimum leverage ratio of 3.25%.

Central bank claims for these purposes include reserves held by a firm at the central bank, banknotes and coins constituting legal currency in the jurisdiction of the central bank, and assets representing debt claims on the central bank with a maturity of no longer than three months.

The PRA adopted the FPC recommendations in October 2017. The rules apply to firms with retail deposits of £50 billion or greater. The rules do not therefore apply to the Bank.

However, the leverage ratio is monitored on an ongoing basis to ensure that the Bank has sufficient levels of capital for current and projected activities.

The table below sets out the leverage ratio as at 31 December 2019 under the CRD IV definition:-

	£ 000s
Total Tier 1 Capital (**A**)	**13,569**
Total Balance sheet assets [1]	38,636
Total off-balance sheet assets and derivates [2]	983
Total assets and contingents (**B**)	**39,619**
Leverage ratio A ÷ B	**34.2%**

[1] (a) After deduction of intangible assets (£18,000); and, (b) deduction of sterling placed on an immediately available reserves account with the Bank of England (£131,800,000) matched by the sterling deposits with identical or longer maturities accepted by the Bank as at 31st December 2019 .
[2] Determined in accordance with CRD IV.

REMUNERATION POLICY

Decision making process for remuneration policy

Overall responsibility for BOCUK's remuneration strategy lies with the Board. The Executive Committee is responsible for the implementation of the remuneration policy and will recommend to the Board any changes to the policy taking into account the Bank's strategic objectives and risk appetite.

Objectives

BOCUK currently operates a discretionary bonus scheme subject to business and staff performance which is designed to link reward with the long-term success of the Bank.

2019 Remuneration

BOCUK employed on average 27 staff including directors during 2019. In view of its size and the nature of its business there are no distinctions by business area when applying the Bank's remuneration policy.

Nine employees of the Bank have been identified as senior management. The criteria for identification are that the staff member is either a director of BOCUK or undertakes a function of significant influence.

No individuals received remuneration of the equivalent of EUR 1 million or more during the year.

	Number of staff	**Aggregate Fixed remuneration 2019 £ 000s**	**Aggregate Variable remuneration 2019 £ 000s**
Directors and senior management	9		0
Other members of staff	18		0