

Bank of America Malaysia Berhad

Pillar 3 Disclosures

As at 30 June 2021

Bank of America Malaysia Berhad

Pillar 3 Disclosures

Attestation by Chief Executive Officer

This is to certify that Bank of America Malaysia Berhad's Basel II Pillar 3 Disclosures as at 30 June 2021, prepared in accordance with the requirements of Bank Negara Malaysia's Guideline on Risk Weighted Capital Adequacy Framework (Basel II) – Disclosure Requirements (Pillar 3) are accurate, complete and not misleading.

RAYMOND YEOH CHENG SEONG

Chief Executive Officer

Bank of America Malaysia Berhad

Pillar 3 Disclosures

Contents

1. SCOPE OF APPLICATION	1
2. CAPITAL ADEQUACY	1
2.1 CAPITAL MANAGEMENT	1
2.2 CORE EQUITY TIER I ("CET I") CAPITAL RATIO, TIER I CAPITAL RATIO AND TOTAL CAPITAL RATIO	2
2.3 RISK WEIGHTED ASSETS ("RWA") AND CAPITAL REQUIREMENTS	2
3. CAPITAL STRUCTURE.....	5
4. RISK MANAGEMENT.....	6
4.1 BAMB'S RISK MANAGEMENT FRAMEWORK.....	6
4.1.1 BAMB Risk Taking Capacity	6
4.1.2 Risk Management Structure.....	7
4.1.3 Risk Management Process.....	8
4.2 CREDIT RISK	9
4.2.1 Breakdown of Gross Credit Exposures.....	13
4.2.2 Breakdown of Gross Impaired Loans, Past Due Loans and Impairment Provisions.....	15
4.2.3 Standardised Approach to Credit Risk.....	17
4.2.4 Credit Risk Mitigation.....	21
4.2.5 Off-Balance Sheet Exposures and Counterparty Credit Risk ("CCR").....	23
4.3 MARKET RISK	25
4.3.1 Market Risk Management Architecture.....	25
4.3.2 Market Risk Management Control, Reporting and Oversight of Senior Management.....	25
4.4 OPERATIONAL RISK	26
4.4.1 Local Operational Risk Management Framework	26
4.5 EQUITY EXPOSURES IN THE BANKING BOOK	26
4.6 INTEREST RATE RISK / RATE OF RETURN IN THE BANKING BOOK ("IRRBB")	27

Bank of America Malaysia Berhad

Pillar 3 Disclosures

1. Scope of Application

Bank of America Malaysia Berhad – BAMB (“Bank” or “BAMB”) is a limited company, incorporated and domiciled in Malaysia. Bank of America, National Association is the holding company and Bank of America Corporation is the ultimate holding company, both are incorporated in the United States of America. The Bank is principally engaged in all aspects of the banking business and in the provision of such related services.

The provisions of Malaysian Financial Reporting Standard (“MFRS”) 127 “Consolidated and Separate Financial Statements” and MFRS 128 “Investments in Associates”, issued by the Malaysian Accounting Standards Board (“MASB”) do not apply to the Bank. Hence the disclosures in this report are made for the Bank as a standalone entity.

2. Capital Adequacy

2.1 Capital Management

The Bank is required to comply with all applicable laws and regulations in Malaysia including Policy Documents and guidelines issued by Bank Negara Malaysia (“BNM”) and other relevant regulatory bodies.

The BAMB Board, through its various Committees, is overall accountable for the management of risk in BAMB.

The Local Management Team (LMT) is responsible for understanding the nature and level of risk being taken by BAMB and ensuring that the risk management processes are being carried out appropriately in light of the risk profile and the business plan. The LMT is also responsible for issue escalations to the Board.

In order to meet this responsibility, the Board, LMT and Asset and Liability Committee (ALCO) will utilize the annual ICAAP to assess the adequacy of capital, internal governance and risk management.

The ICAAP process seeks to ensure that the Bank maintains sufficient capital at all times, plans for all future capital requirements and at the same time, maintains adequate governance and monitoring over its material risks. It establishes a framework for the Bank to perform a comprehensive assessment of the risks they face and to relate capital to those risks. The capital assessment performed by the Bank is expected to encompass all risks, not just the risks captured by the Basel II Pillar 1 minimum regulatory capital calculations. BAMB has undertaken a Comprehensive Risk Assessment to identify all material risks and ensure adequate capital is held to commensurate with such material risks. BAMB has established quantitative and qualitative methodologies to assess each risk to determine its materiality.

The Bank has established an Internal Capital Guideline (IGL) and maintains capital levels in excess of this guideline. The internal buffer over the minimum requirement serves as an early warning signal for management and prompts remediation actions to avoid any capital breach.

Bank of America Malaysia Berhad

Pillar 3 Disclosures

2.2 Core Equity Tier I (“CET I”) Capital Ratio, Tier I Capital Ratio and Total Capital Ratio

The total capital and capital adequacy ratios of the Bank are computed in accordance with BNM’s Policy Documents on Capital Adequacy Framework Capital Components issued on 9th December 2020 and Basel-II Risk-Weighted Assets issued on 3rd May 2019.

Table 1.1: Capital Ratios

	30.06.2021	31.12.2020
CET I Capital Ratio	45.564%	34.043%
Tier I Capital Ratio	45.564%	34.043%
Total Capital Ratio	45.769%	34.217%

Table 1.2: Capital Adequacy Requirements

	CET I Capital Ratio	Tier I Capital Ratio	Total Capital Ratio
30.06.2021	7.000%	8.500%	10.500%
31.12.2020	7.000%	8.500%	10.500%

The minimum regulatory capital adequacy requirements as stated above include capital conservation and counter-cyclical buffers.

2.3 Risk Weighted Assets (“RWA”) and Capital Requirements

The Bank has adopted the Standardised Approach (“SA”) for Credit Risk and Market Risk and Basic Indicator Approach (“BIA”) for Operational Risk for computing its capital requirement. The Bank does not have any capital requirement for Large Exposure Risk as there is no amount in excess of the lowest threshold arising from equity holdings as specified in BNM’s Policy Document on Capital Adequacy Framework (Basel II – Risk-Weighted Assets).

Bank of America Malaysia Berhad

Pillar 3 Disclosures

Table 2.1: Exposures as at 30 June 2021

Exposure Class 30.06.2021	Gross Exposures/^EAD before #CRM	Net Exposures/^ EAD after #CRM	RWA	RWA absorbed by *PSIA	Total RWA after effects of PSIA	Minimum Capital Requirement at 8%
	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000
Credit Risk						
<u>On-Balance Sheet Exposures:</u>						
Sovereigns/Central Banks	2,838,117	2,838,117	-	-	-	-
Banks, Development Financial Institutions ("DFIs") & Multilateral Development Banks ("MDBs")	65,453	65,453	13,091	-	13,091	1,047
Insurance Cos, Securities Firms & Fund Managers	10,591	10,591	5,786	-	5,786	463
Corporates	188,513	188,513	188,513	-	188,513	15,081
Residential Mortgages	46	46	16	-	16	1
Other Assets	89,903	89,903	88,487	-	88,487	7,079
Defaulted Exposures	12,845	12,845	7,374	-	7,374	590
Total On-Balance Sheet Exposures	3,205,468	3,205,468	303,267	-	303,267	24,261
<u>Off-Balance Sheet Exposures:</u>						
OTC Derivatives	370,985	370,985	187,175	-	187,175	14,974
Off-Balance Sheet Exposures Other Than OTC Derivatives or Credit Derivatives	154,905	150,945	150,294	-	150,294	12,024
Total Off-Balance Sheet Exposures	525,890	521,930	337,469	-	337,469	26,998
Total On and Off-Balance Sheet Exposures	3,731,358	3,727,398	640,736	-	640,736	51,259
Market Risk						
	Long Position	Short Position				
Foreign currency	15,436	187,548	187,548	-	187,548	15,004
Interest rate			645,503	-	645,503	51,640
Total Market Risk Exposure			833,051	-	833,051	66,644
Total Operational Risk Exposure						
			314,536	-	314,536	25,163
Total RWA and Capital Requirements						
			1,788,323	-	1,788,323	143,066

Key:

^ Exposure at Default ("EAD")

Credit Risk Mitigation ("CRM")

* Profit Sharing Investment Account ("PSIA")

Bank of America Malaysia Berhad

Pillar 3 Disclosures

Table 2.2: Exposures as at 31 December 2020

Exposure Class 31.12.2020	Gross Exposures/^EAD before #CRM RM'000	Net Exposures/^EAD after #CRM RM'000	RWA RM'000	RWA absorbe d by *PSIA RM'000	Total RWA after effects of PSIA RM'000	Minimum Capital Requirement at 8 % RM'000
Credit Risk						
<u>On-Balance Sheet Exposures:</u>						
Sovereigns/Central Banks	3,332,310	3,332,310	-	-	-	-
Banks, Development Financial Institutions ("DFIs") & Multilateral Development Banks ("MDBs")	129,200	129,200	25,840	-	25,840	2,067
Insurance Cos, Securities Firms & Fund Managers	44,029	44,029	22,990	-	22,990	1,839
Corporates	260,666	260,666	260,666	-	260,666	20,853
Residential Mortgages	83	83	29	-	29	2
Other Assets	27,666	27,666	26,898	-	26,898	2,152
Defaulted Exposures	15,464	15,464	8,647	-	8,647	692
Total On-Balance Sheet Exposures	3,809,418	3,809,418	345,070	-	345,070	27,605
<u>Off-Balance Sheet Exposures:</u>						
OTC Derivatives	343,952	343,952	203,110	-	203,110	16,249
Off-Balance Sheet Exposures Other Than OTC Derivatives or Credit Derivatives	154,400	149,940	146,636	-	146,636	11,731
Total Off-Balance Sheet Exposures	498,352	493,892	349,746	-	349,746	27,980
Total On and Off-Balance Sheet Exposures	4,307,770	4,303,310	694,816	-	694,816	55,585
Market Risk						
	Long Position	Short Position				
Foreign currency	13,409	905,991	905,991	-	905,991	72,479
Interest rate			472,015	-	472,015	37,761
Total Market Risk Exposure			1,378,006	-	1,378,006	110,240
Total Operational Risk Exposure			317,760	-	317,760	25,421
Total RWA and Capital Requirements			2,390,582	-	2,390,582	191,246

Key:

^ Exposure at Default ("EAD")

Credit Risk Mitigation ("CRM")

* Profit Sharing Investment Account ("PSIA")

Bank of America Malaysia Berhad

Pillar 3 Disclosures

3. Capital Structure

The Bank's total regulatory capital is made up of Tier I and Tier II capital as follows:

Tier I Capital consists of ordinary paid-up share capital, approved retained profits and unrealised gains and losses of financial instruments measured at fair value through other comprehensive income (FVOCI) less net deferred tax asset and applicable regulatory adjustments.

There is no obligation to pay dividend to ordinary shareholders. No dividend has been paid or proposed for the financial period ended 30 June 2021.

Tier II Capital consists of regulatory reserve and collective impairment allowance for non-impaired loans, advances and financing.

The components of CET I, Tier I and Tier II capital are as follows:

Table 3.1: Components of Capital

	30.06.2021 RM'000	31.12.2020 RM'000
<u>CET I Capital</u>		
Share Capital	135,800	135,800
Retained Profits	680,457	680,457
Other Disclosed Reserves:		
Unrealised gains and losses of financial instruments measured at FVOCI	1,065	1,059
	817,322	817,316
Less: Regulatory Adjustments		
Deferred Tax Assets	(1,902)	(2,206)
55% of Cumulative Gains of financial instruments measured at FVOCI	(586)	(582)
Regulatory reserve	-	(693)
Total CET I and Tier I Capital	814,834	813,835
<u>Tier II Capital</u>		
Loss Allowance for non-credit impaired exposures*	3,672	3,451
Regulatory Reserve	-	693
Total Tier II Capital	3,672	4,144
Total Capital	818,506	817,979

* Excludes Lifetime ECL Credit Impaired (Stage 3) loans on impaired loans restricted from Tier II Capital of BAMB of RM19,443k (31.12.2020 : RM21,052k).

Bank of America Malaysia Berhad

Pillar 3 Disclosures

4. Risk Management

Bank of America Corporation (BAC), as our parent, has established risk governance framework which serves as the foundation for consistent and effective management of risks facing the Bank. The Risk Framework applies to all the Bank employees. It provides an understanding of the Bank's approach to risk management and each employee's responsibilities for managing risk. All employees must take ownership in managing risk well and are accountable for identifying, escalating and debating risks that the Bank is exposed to. BAMB is also guided by the Bank Negara Malaysia ("BNM") guidelines and procedures.

The following lays out BAMB's risk management framework, risk taking capacity and risk management processes:

4.1 BAMB's Risk Management Framework

BAMB is committed to maintaining strong, consistent risk management practices. The five (5) components of BAMB's risk management approach are as follows:

- **Culture of Managing Risk Well:** A culture that instills the importance of managing risk well, ensures appropriate focus on risk in all activities and emphasizes that risk is everyone's responsibility. It encourages the necessary mind-set and behavior to enable effective risk management and promote sound risk-taking within our risk appetite. Individual accountability is the cornerstone of our culture. Our culture requires that all risks are promptly identified, escalated and debated, thereby benefiting the overall performance of the Bank.
- **Risk appetite and risk limits:** The Bank's Risk Appetite Statement defines the types and levels of risk the Bank is willing to take to achieve its objectives. It includes qualitative statements and quantitative measures, as appropriate.
- **Risk Management Processes:** Sound risk management includes processes to effectively identify, measure, monitor and control risk. Risk management is both an essential component of our daily business activities and an integral part of our strategic, capital and financial planning processes.
- **Risk data management, aggregation and reporting:** Effective risk reporting provides a clear understanding of our risk profile. We leverage our data and management information systems to achieve transparency and generate actionable insights.
- **Risk Governance:** Our risk governance framework serves as the foundation for the comprehensive management of risks facing the Bank. It outlines, among other things, clear ownership and accountability for managing risk across three lines of defense: front line units, independent risk management and Corporate Audit.

4.1.1 BAMB Risk Taking Capacity

BAMB adopts a disciplined approach to understanding and managing risk to minimize the volatility of its financial results, create sustainable earnings and protect its brand and reputation. BAMB is committed to maintaining strong, consistent risk management practices and aims to balance its capacity for risk commensurate with its capital and liquidity, while adhering to all applicable rules and regulations in Malaysia.

The document on Risk Appetite Statement (also known as BAMB Risk Taking Capacity) defines the main principles, governance and methodologies that ensure that BAMB activities and culture are aligned to the above stated risk management philosophy.

Bank of America Malaysia Berhad

Pillar 3 Disclosures

Governance Processes and Controls

Approval

BAMB's Risk Taking Capacity (RTC) metrics are updated in the Risk Appetite Statement (RAS) (where approved as part of other BAMB policy/limit approvals), or proposed and approved annually as part of the RAS. A thorough review and assessment of the Risk Taking Capacity metrics following the principles in the RAS document will be initiated by the Chief Risk Officer (CRO). The stakeholders for each Risk Category will be engaged in this review process. Upon completion of the review and assessment, the CRO will put forth a recommendation to the LMT for appropriate Risk Taking Capacity metrics that will be applicable for the following 12 months. The recommended Risk Taking Capacity metrics will first be reviewed and approved by the LMT, followed by the BAMB Risk Management Committee (RMC), and finally by the BAMB Board of Directors (Board).

Monitoring

The monitoring of risk appetite metrics and performance against limits is carried out on a monthly basis and BAMB CRO provides independent reporting at least on a monthly basis via a RTC performance report to the LMT. The performance report will also be tabled to the BAMB RMC and Board for their noting.

Exceptions

Breaches of any Risk Taking Capacity triggers or limits serve as an early warning signal and will be highlighted to LMT. LMT will determine if any mitigating actions should be taken.

Breaches of any Risk Taking Capacity triggers or limits are escalated and managed by BAMB as outlined below:-

- Escalation to the BAMB Chief Executive Officer (CEO) and BAMB Country Risk Officer (CRO) shall occur as soon as practically possible.
- The BAMB CRO will notify the LMT of the breach. Depending on the materiality of the breach, an ad-hoc LMT meeting will be convened as soon as practically possible to discuss remediation steps. Based on the materiality of the breach, LMT will determine if it should be escalated to the Board.
- A temporary limit increase may be approved by the CEO and CRO if considered appropriate. This will be presented and approved at the next BAMB RMC and Board meeting, with permanent increases subject to approval by the Board.
- All limit breaches and progress on remediation are reported to the BAMB RMC and Board at each Board meeting until they are successfully remediated.

4.1.2 Risk Management Structure

All BAMB employees are responsible for the below risk management:

- **Businesses:** Business (Front Line Unit) managers, Wholesale Credit and associates are accountable for identifying and managing all risks in their business units, including existing and emerging risks. Business managers must ensure that their business activities are conducted within BAMB's Risk Taking Capacity Document. BAMB risk teams are responsible for establishing policies, limits, standards, controls, metrics and thresholds within the defined corporate standards.
- **Governance & Control:** The BAMB Risk teams, including the CRO and Market Risk, are independent from the Businesses, and maintain sufficient autonomy to develop and implement meaningful risk management measures. Corporate Operational Risk, Enterprise Credit Risk Vendor Risk Management, Enterprise Stress Testing and Global Recovery and Resolution Planning are responsible for setting and establishing enterprise policies, programs and standards, assessing program adherence, providing enterprise-level risk oversight,

Bank of America Malaysia Berhad

Pillar 3 Disclosures

reporting and monitoring for systemic and emerging risk issues. In addition, the BAMB risk teams are responsible for monitoring and ensuring risk limits within their function are reasonable and consistent with the BAMB's Risk Taking Capacity.

- **Corporate Audit:** The BAMB Corporate Audit function maintains independence from the Businesses and Governance & Control Functions by reporting directly to the Audit Committee of BAMB. The Corporate Audit provides independent assessment and validation through testing of key processes and controls.

Oversight of BAMB's Board and Senior Management: BAMB's Board and Senior Management have responsibility for overseeing and managing all risks faced by BAMB. Management of risks relevant to BAMB is accomplished through the Risk Framework, Risk Taking Capacity, ongoing reporting and monitoring, and approved policies, procedures and guidelines. Senior management is well qualified and has significant experience in the industry.

4.1.3 Risk Management Process

On a day-to-day basis, BAMB's employees are responsible for managing risks which are threatening the interests of the Bank. Employees are provided ongoing training opportunities on risk management and are given clear, detailed guidance through supporting processes such as governance bodies (e.g. committees) and supporting management documents (e.g. policies, procedures, standard operating requirements, guidelines, playbooks, etc). BAMB employs a simple but effective overarching risk management process, referred to as IMMC. This process builds on employees' regular tasks and ensures a solid knowledge base for mitigating risk:

- **Identify:** To be effectively managed, risks must be clearly defined and proactively identified. Proper risk identification focuses on recognizing and understanding all key risks inherent in our business activities or key risks that may arise from external factors. Risk identification is an ongoing process incorporating input from front line units and control functions, designed to be forward looking and capture relevant risk factors across all BAMB lines of business.
- **Measure:** Once a risk is identified, it must be accurately measured, through a systematic risk quantification process including quantitative and qualitative components. Risk is measured at various levels including, but not limited to, risk type, front line unit, legal entity and on an aggregate basis. This risk quantification process helps to capture changes in BAMB risk profile due to changes in strategic direction, concentrations, portfolio quality and the overall economic environment. Senior Management considers how risk exposures might evolve under a variety of stress scenarios.
- **Monitor:** We monitor risk levels regularly to track adherence to risk appetites, policies, standards, procedures and processes. BAMB also regularly update risk assessments and review risk exposures. Through our monitoring, we know our level of risk relative to limits and can take action in a timely manner. We also know when risk limits are breached and have processes to appropriately report and escalate exceptions. This includes immediate requests for approval to managers and alerts to executive management, management level committee or the Board of Directors (directly or through an appropriate board committee);
- **Control:** We establish and communicate risk limits and controls through policies, standards, procedures and processes that define responsibility and authority for risk-taking. The limits and controls can be adjusted by the boards or management when conditions or risk tolerances warrant. These limits may be absolute (e.g. loan amount, trading volume) or relative (e.g. percentage of loan booked in higher risk categories). Our lines of business are held accountable to perform within the established limits.

Bank of America Malaysia Berhad

Pillar 3 Disclosures

4.2 Credit Risk

Credit risk is the risk of loss arising from the inability or failure of a borrower or counterparty to meet its repayment obligations. Credit risk is managed based on the risk profile of the borrower or counterparty, repayment sources, the nature of underlying collateral, and expected impacts of the current and forward-looking economic environment on the borrowers or counterparties.

Credit risk in BAMB primarily arises from its banking and trading activities.

- Loans;
- FX/Derivative transactions (plain vanilla)
- Global Vendor financing;
- Due from placements with banks;
- Standby letters of credit/bank guarantees; and
- Trade finance products.

Given the description of its business above, BAMB is primarily exposed to credit risk of corporates and financial institutions including banks.

Credit Underwriting & Approval

Credit processes are designed to execute the defined credit strategy (e.g. product-specific underwriting and client selection criteria) and adhere to credit policies (e.g. BAMB Credit Compliance Manual (CCM), BAC Core Credit Policy and other BAMB local policies), while remaining compliant with local laws, rules and regulations. In assessing borrowers' credit risk, analysis include an assessment of the borrower's character, debt capacity, capital structure, collateral and business prospects. For borrowers identified as higher risk, or where certain transaction have negative environmental and/or social risk as defined in BAC Core Credit Policy or BAC's Environmental and Social Risk Policy Framework ("ESRPF") it will be subject to enhanced due diligence. This analysis drives a forward-looking internal risk rating, which when taken in conjunction with the amount and type of exposure determines the required level of approval. Risk ratings are also used to ensure portfolio asset quality remains within approved credit risk standards and limits. Risk ratings follow BAC's internal scale of 1-11 and are monitored on an ongoing basis.

Besides following the Internal Approval Grid, BAMB also has a local onshore approving authority based on the local approving threshold. While approvals may be obtained from regional or global credit/risk officers, all credit actions require sign-off and approval from the onshore BAMB CRO and subject to Local Onshore Approval Authority, without which these credit actions are not considered approved. BAMB CRO shall escalate any concerns on specific credit decisions to the BAMB BOD and Local Management Team "LMT" as necessary.

Credit Risk Approval

GCIB Credit Officers perform due diligence comprising analysis of credit risk and preparation of approval memorandum including Risk Rating, identification of Sources of Repayment and Key Credit Risks, recommendation of facilities (including traded products with potential credit exposures) with required terms and conditions.

All credit exposure will be approved based on the GCIB Credit and Risk Approval Authority Grid, and local BAMB onshore approving authority. Minimum approvals required are from the onshore GCIB Credit Officer and BAMB CRO (i.e. as part of independent credit risk function). Escalation to higher approving authority levels may be required based on the defined levels in the approval grid, and also for higher-risk industries and facility structures.

Bank of America Malaysia Berhad

Pillar 3 Disclosures

Credit Portfolio Management

Once credit has been extended, processes are in place to monitor credit risk exposures at both the individual and portfolio levels, as well as to actively manage the portfolio to achieve risk and return goals. Key credit risk exposures are assessed both in normal and stressed scenarios.

At the borrower level, the risk inherent in the ongoing business of the borrower is reviewed. At the portfolio level, the aggregate losses, credit concentrations and potential stress scenarios are assessed. Regular portfolio reporting and business-specific credit reviews enable GCIB Credit and Credit Risk officers to detect deteriorating credit trends, develop mitigation strategies and measure the effectiveness of actions taken.

GCIB Credit, as well as supporting units (such as credit operations), and with oversight by Risk, is responsible for the ongoing management and administration of credit risk at the borrower level by:

- Reviewing borrower risk ratings on an ongoing basis, and if necessary, adjusting them to reflect changes in the financial condition, cash flow, risk profile or outlook of a borrower or counterparty;
- Monitoring the financial performance of each borrower;
- Monitoring collateral to ensure sufficient coverage;
- Undertaking periodic portfolio reviews to ensure management is aware of borrower specific trends for a given portfolio;
- Recognizing developing problems and promptly bringing them to the attention of management;
- Recommending exposure management measures;
- Taking prompt corrective action on past due and non-accrual loans; and
- Maintaining proper credit file documentation and determining compliance with all loan covenants periodically.

Credit Risk Taking Capacity

Credit Quality Metrics: established to monitor and limit potential adverse impact of BAMB's risk taking activities to BAMB's capital and profitability levels. The internal and tripwire/trigger limits established to monitor credit quality are as follows:

- Stage 3 (Credit-Impaired) loans: defined as total Stage 3 Credit-Impaired loans (previously called non-performing loans) as a % of total loan exposure in BAMB (excluding housing loan portfolio) to be no greater than 2%. Stage 3 loans impact profitability as such loans are usually placed on non-accrual status and requires specific assessment on expected credit losses ("ECL"). In BAMB, Stage 3 exposures usually will have a risk rating of 9- (substandard) or lower. Tripwire/trigger is set at 1%.
- Net Credit Loss Rate: defined as the Year-to-date charge off of loan exposures as % of total loan exposures in BAMB (excluding housing loan portfolio) to be less than 0.50%. Loans are charged off if they are determined to be uncollectible. Tripwire/trigger is set at 0.25%.
- FRR8 or worse % of Total Binding Exposure "TBE" (excluding Due From BNM): defined as TBE rated FRR8 (Special Mention) or worse as a % of TBE in BAMB (excluding Due From BNM) to be no greater than 6%. This metrics enables an early warning indicator "EWI" of deterioration in credit quality as it includes loans which are still performing in the RR8 or 9+ rating categories. For the purposes of this metrics. Tripwire/trigger is set at 4%.

Credit Concentration Risk Metrics: established to monitor concentration risks which could expose BAMB to higher risk of credit losses if there is undue concentration in any specific industry or client relationship.

Bank of America Malaysia Berhad

Pillar 3 Disclosures

Concentration risk is monitored via expressed limits on certain higher risk industries as well as guidelines on single relationship or connected party concentration.

- Single Customer Exposure Limit: Definition as determined by Bank Negara Malaysia. Internal and escalation thresholds for Corporate and FI, and Intragroup is as detailed in BAMB's SCEL Policy
- Large Exposure Limit: Definition as determined by Bank Negara Malaysia. Internal and escalation thresholds for large loan is as detailed in BAMB's SCEL Policy.
- Connected Party Exposure Limit: Definition as determined by BNM. Internal and escalation thresholds aligned to Corporate and FI SCEL.
- Industry Limits: defined as maximum TBE to the following higher risk industries. Industry TBE as a % of TBE in BAMB (excluding Due From BNM) to the higher risk industries below should not exceed 10%, with Tripwire/Trigger of 8%:
 - i. Commercial Real Estate
 - ii. Construction
 - iii. Shipping
 - iv. Aviation (added in view of travel restrictions imposed globally due to COVID-19)

Note : As at 30 June 2021, BAMB does not have exposures in commercial real estate, shipping and aviation industries.

BAMB's credit portfolio as of 30 June 2021 primarily comprises exposure to the Government of Malaysia, large local and foreign commercial banks operating in Malaysia, and the Malaysian subsidiaries of MNCs.

- Exposure to the Government of Malaysia consists of due from placements with Bank Negara Malaysia.
- Exposure to large local and foreign commercial banks primarily comprises due from placements, FX swaps, FX forwards, cross currency swaps, and interest rate swaps. Client selection is considered sound and most derivative and FX exposure is traded under Credit Support Annexes ("CSAs"), mitigating the exposure through the posting of collateral based on pre-agreed terms.

Credit exposure to Malaysian subsidiaries of MNCs consists primarily of working capital and trade facilities extended on an uncommitted/on-demand basis and FX forwards. BAMB MNC's clients are mostly secured against Corporate Guarantee of the Parent company.

Past Due and Impaired Loans, Advances and Financing

- The Bank considers a loan/financing to be past due once a contractual payment on principal and/or interest remained unpaid by the borrower on its due date.
- The Bank also follows Bank Negara Malaysia Policies on Credit Risk (BNM/RH/PD/029-22) and Financial Reporting (BNM/RH/PD/032-13).

Impairment

- The Bank recognises loss allowances for Expected Credit Losses ("ECL") on the following financial instruments that are not measured at Fair Value Through Profit/Loss;
 - Financial assets that are debt instruments
 - Financial guarantee contracts issued
 - Loan commitments issued
 - Loans and advances

No impairment loss is recognised on equity investments.

- The Bank measures loss allowances at an amount equal to 12 months ECL for financial instruments on which credit risk has not increased significantly since their initial recognition. Loss allowances for financial instruments where there has been a significant increase in credit risk are measured at lifetime ECL.

Bank of America Malaysia Berhad

Pillar 3 Disclosures

- 12 months ECL are the portion of ECL that result from default events on a financial instrument that are possible within the 12 months after the reporting date. Lifetime ECL are the expected credit losses that result from all possible default events over the expected life of the financial instrument.
- ECL will be assessed using an approach which classifies financial assets into three stages which reflects the change in credit quality of the financial assets since initial recognition:

Stage 1: 12 months ECL – not credit impaired

For credit exposures where there has not been a significant increase in credit risk since initial recognition or which has low credit risk at reporting date and that are not credit impaired upon origination, the ECL associated with the probability of default events occurring within the next 12 months will be recognised.

Stage 2: Lifetime ECL – not credit impaired

For credit exposures where there has been a significant increase in credit risk since initial recognition but that are not credit impaired, the ECL associated with the probability of default events occurring within the lifetime ECL will be recognised. Unless identified at an earlier stage, all financial assets are deemed to have suffered a significant increase in credit risk when 30 days past due.

Stage 3: Lifetime ECL – credit impaired

Financial assets are assessed as credit impaired when one or more objective evidence of defaults that have a detrimental impact on the estimated future cash flows of that asset have occurred. For financial assets that have become credit impaired, a lifetime ECL will be recognised.

- **Measurement of ECL:**

ECL are unbiased and probability-weighted estimate of credit losses, measured as follows:

- For financial assets that are not credit-impaired at the reporting date, the present value of all cash shortfalls (i.e. the difference between the cash flows due to the entity in accordance with the contract and the cash flows that the Bank expects to receive);
- For financial assets that are credit-impaired at the reporting date, the difference between the gross carrying amount and the present value of estimated future cash flows;
- For undrawn loan commitments, the present value of the difference between the contractual cash flows that are due to the Bank if the commitment is drawn upon and the cash flows that the Bank expects to receive; and
- For financial guarantee contracts, the expected payments to reimburse the holder less any amounts that the Bank expects to recover.

- **Credit-impaired financial assets:**

- At each reporting date, the Bank assesses whether financial assets carried at amortised cost and debt financial assets carried at FVOCI are credit-impaired. A financial asset is 'credit-impaired' when one or more events that have a detrimental impact on the estimated future cash flows of the financial asset have occurred.
- Evidence that a financial asset is credit-impaired includes the following observable data:
 - Significant financial difficulty of the borrower or issuer;
 - A breach of contract such as a default or past due event;
 - The restructuring of a loan or advance by the Bank on terms that the Bank would not consider otherwise;

Bank of America Malaysia Berhad

Pillar 3 Disclosures

- It is becoming probable that the borrower will enter bankruptcy or other financial reorganisation;
 - The disappearance of an active market for a security because of financial difficulties.
- A loan that has been renegotiated due to a deterioration in the borrower's condition is usually considered to be credit-impaired unless there is evidence that the risk of not receiving contractual cash flows has reduced significantly and there are no other indicators of impairment.

4.2.1 Breakdown of Gross Credit Exposures

(a) By Geographical Distribution

Table 4.1: Exposures by Geographical Distribution

Category	Malaysia RM'000	United States RM'000	Singapore RM'000	United Kingdom RM'000	Others RM'000	Total RM'000
30.06.2021						
Sovereign/Central Banks	2,838,117	-	-	-	-	2,838,117
Banks, DFIs, and MDBs	206,075	39,712	32,979	37,151	13,054	328,971
Insurance Cos, Securities Firms & Fund Managers	7,119	52	2	39,059	13	46,245
Corporates	428,042	3	9	-	22	428,076
Residential Mortgages	46	-	-	-	-	46
Other Assets	89,903	-	-	-	-	89,903
Total as at 30 June 2021	3,569,302	39,767	32,990	76,210	13,089	3,731,358
31.12.2020						
Sovereign/Central Banks	3,332,310	-	-	-	-	3,332,310
Banks, DFIs, and MDBs	235,658	31,951	43,068	28,077	17,551	356,305
Insurance Cos, Securities Firms & Fund Managers	10,285	-	2	53,842	37,976	102,105
Corporates	489,027	-	260	-	14	489,301
Residential Mortgages	83	-	-	-	-	83
Other Assets	27,666	-	-	-	-	27,666
Total as at 31 December 2020	4,095,029	31,951	43,330	81,919	55,541	4,307,770

Bank of America Malaysia Berhad

Pillar 3 Disclosures

(b) By Sector Distribution

Table 4.2: Exposures by Sector Distribution

Category	Finance, Insurance and Business Services	Government & Government Agencies	Manufacturing	General Commerce	Mining & Quarrying	Construction	Education , Health and Others	Transport, Storage and Communication	Purchase of Residential Landed Property, Securities, and Transport Vehicles	Others	Total
	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000		RM'000	RM'000	RM'000
30.06.2021											
Sovereign/Central Banks	-	2,838,117	-	-	-	-	-	-	-	-	2,838,117
Banks, DFIs, and MDBs	328,971	-	-	-	-	-	-	-	-	-	328,971
Insurance Cos, Securities Firms & Fund Managers	46,245	-	-	-	-	-	-	-	-	-	46,245
Corporates	147,557	-	183,495	27,830	64,807	2,164	272	1,951	-	-	428,076
Residential Mortgages	-	-	-	-	-	-	-	-	46	-	46
Other Assets	89,412	-	-	-	-	-	-	-	444	47	89,903
Total as at 30 June 2021	612,185	2,838,117	183,495	27,830	64,807	2,164	272	1,951	490	47	3,731,358
31.12.2020											
Sovereign/Central Banks	-	3,332,310	-	-	-	-	-	-	-	-	3,332,310
Banks, DFIs, and MDBs	356,305	-	-	-	-	-	-	-	-	-	356,305
Insurance Cos, Securities Firms & Fund Managers	102,105	-	-	-	-	-	-	-	-	-	102,105
Corporates	216,978	-	231,828	14,361	19,075	4,644	-	2,415	-	-	489,301
Residential Mortgages	-	-	-	-	-	-	-	-	83	-	83
Other Assets	27,162	-	-	-	-	-	-	-	504	-	27,666
Total as at 31 December 2020	702,550	3,332,310	231,828	14,361	19,075	4,644	-	2,415	587	-	4,307,770

Bank of America Malaysia Berhad

Pillar 3 Disclosures

(c) By Residual Maturity

Table 4.3: Exposures by Residual Maturity

Category	Up to 1 Year	More than 1 Year to 5 Years	More than 5 Years	Total
	RM'000	RM'000	RM'000	RM'000
30.06.2021				
Sovereign/Central Banks	2,492,016	346,101	-	2,838,117
Banks, DFIs, and MDBs	164,898	164,073	-	328,971
Insurance Cos, Securities Firms & Fund Managers	20,184	26,061	-	46,245
Corporates	273,712	154,321	43	428,076
Residential Mortgages	46	-	-	46
Other Assets	89,428	31	444	89,903
Total as at 30 June 2021	3,040,284	690,587	487	3,731,358
31.12.2020				
Sovereign/Central Banks	3,332,310	-	-	3,332,310
Banks, DFIs, and MDBs	242,425	113,880	-	356,305
Insurance Cos, Securities Firms & Fund Managers	63,274	38,831	-	102,105
Corporates	431,938	57,363	-	489,301
Residential Mortgages	83	-	-	83
Other Assets	27,162	37	467	27,666
Total as at 31 December 2020	4,097,192	210,111	467	4,307,770

4.2.2 Breakdown of Gross Impaired Loans, Past Due Loans and Impairment Provisions

(a) Gross Impaired Loans, Advances and Financing Analysed by Sector and Geographical Area

Table 5.1: Impaired Loans, Advances and Financing by Sector and Geographical Area

	30.06.2021	31.12.2020
	RM'000	RM'000
Malaysia		
Purchase of Residential Landed Property, Securities and Transport Vehicles	13	26
Mining	31,275	35,489
Transport, storage, communication	1,001	1,001
Total Gross Impaired Loans, Advances and Financing	32,289	36,516
Gross Impaired Loans as a % of Gross Loans, Advances and Financing	14.52%	12.18%

Bank of America Malaysia Berhad

Pillar 3 Disclosures

(b) Gross Loan, Advances and Financing Past Due but Not Impaired, Analysed by Sector and Geographical Area

Table 5.2: Loans, Advances and Financing Past Due but Not Impaired by Sector and Geographical Area

	30.06.2021 RM'000	31.12.2020 RM'000
Malaysia		
Purchase of Residential Landed Property, Securities and Transport Vehicles	-	-
Total Gross Loans, Advances and Financing Past Due but Not Impaired	-	-

(c) Impairment Analysed by Sector and Geographical Area

Table 5.3: Lifetime ECL Credit Impaired (Stage 3) by Sector and Geographical Area

	30.06.2021 RM'000	31.12.2020 RM'000
Malaysia		
Purchase of Residential Landed Property, Securities and Transport Vehicles	13	26
Mining	19,380	20,940
Transport, storage, communication	50	86
Total Lifetime ECL Credit Impaired (Stage 3)	19,443	21,052

Table 5.4: 12 Months ECL (Stage 1) and Lifetime ECL Not Credit Impaired (Stage 2) by Sector and Geographical Area

Category	Malaysia RM'000	Total RM'000
30.06.2021		
Finance, Insurance and Business Services	557	557
General Commerce	138	138
Manufacturing	1,623	1,623
Total 12 Months ECL (Stage 1) and Lifetime ECL Not Credit Impaired (Stage 2) as at 30 June 2021	2,318	2,318
31.12.2020		
Finance, Insurance and Business Services	547	547
General Commerce	30	30
Manufacturing	1,714	1,714
Total 12 Months ECL (Stage 1) and Lifetime ECL Not Credit Impaired (Stage 2) as at 31 December 2020	2,291	2,291

Bank of America Malaysia Berhad

Pillar 3 Disclosures

(d) Movement in Lifetime ECL Credit Impaired (Stage 3) by Sector

Table 5.5: Movement in Lifetime ECL Credit Impaired (Stage 3) by Sector

	Mining	Transport, storage, communication	Purchase of Residential Landed Property, Securities and Transport Vehicles	Total
	RM'000	RM'000	RM'000	RM'000
In Malaysia				
At 1 January 2021	20,940	86	26	21,052
Additional allowance made	-	-	-	-
Written back	(1,560)	(36)	(13)	(1,609)
At 30 June 2021	19,380	50	13	19,443
In Malaysia				
At 1 January 2020	19,878	-	27	19,905
Additional allowance made	1,062	86	-	1,148
Written back	-	-	(1)	(1)
At 31 December 2020	20,940	86	26	21,052

(e) Reconciliation of Changes in ECL and Impairment Provisions

Table 5.6: Reconciliation of Changes in ECL and Impairment Provisions

	30.06.2021 RM'000	31.12.2020 RM'000
<u>Lifetime ECL Credit Impaired (Stage 3)</u>		
Opening Balance	21,052	19,905
Allowance Made During the period	-	1,148
Written back	(1,609)	(1)
Closing Balance	19,443	21,052
<u>12 Months ECL (Stage 1) and Lifetime ECL Not Credit Impaired (Stage 2)</u>		
Opening Balance	2,291	1,430
Allowance Made During the period	578	1,368
Written Back	(551)	(507)
Closing Balance	2,318	2,291

4.2.3 Standardised Approach to Credit Risk

Under the standardised approach for credit risk, the determination of the capital requirements is based on an approach that links predefined risk weights to predefined classes of assets to which credit exposures are assigned.

For Sovereigns/Central Banks, Public Sector Entities, Banking Institutions and Corporates, external ratings are used as basis for determination of risk weights. These external ratings are provided by External Credit Assessment Institutions ("ECAI") recognised by BNM, namely:

- Standard & Poor's Rating Services ("S&P");
- Moody's Investors Service ("Moody's");
- Fitch Ratings ("Fitch"); and

Bank of America Malaysia Berhad

Pillar 3 Disclosures

- RAM Rating Services Berhad (“RAM”).

The following is a summary of risk weights and rating categories used in assigning credit quality to credit exposures under the standardised approach:

Table 6.1: Rating Categories of Sovereigns / Central Banks

Rating Category	S&P	Moody's	Fitch	Risk Weight
1	AAA to AA-	Aaa to Aa3	AAA to AA-	0%
2	A+ to A-	A1 to A3	A+ to A-	20%
3	BBB+ to BBB-	Baa1 to Baa3	BBB+ to BBB-	50%
4	BB+ to B-	Ba1 to Ba3	BB+ to B-	100%
5	CCC+ to D	Caa1 to C	CCC+ to D	150%
Unrated				100%

Table 6.2: Rating Categories of Banking Institutions

Rating Category	S&P	Moody's	Fitch	RAM	Risk Weight	Risk Weight (Original Maturity of 6 Months or Less)	Risk Weight (Original Maturity of 3 Months or Less)
1	AAA to AA-	Aaa to Aa3	AAA to AA-	AAA to AA3	20%	20%	20%
2	A+ to A-	A1 to A3	A+ to A-	A1 to A3	50%	20%	
3	BBB+ to BBB-	Baa1 to Baa3	BBB+ to BBB-	BBB1 to BBB3	50%	20%	
4	BB+ to B-	Ba1 to Ba3	BB+ to B-	BB1 to B3	100%	50%	
5	CCC+ to D	Caa1 to C	CCC+ to D	C1 to D	150%	150%	
Unrated					50%	20%	

Table 6.3: Rating Categories of Corporates / Insurance Cos, Securities Firms & Fund Managers

Rating Category	S&P	Moody's	Fitch	RAM	Risk Weight
1	AAA to AA-	Aaa to Aa3	AAA to AA-	AAA to AA3	20%
2	A+ to A-	A1 to A3	A+ to A-	A1 to A3	50%
3	BBB+ to BB-	Baa1 to Ba3	BBB+ to BB-	BBB1 to BB3	100%
4	B+ to D	B1 to C	B+ to D	B1 to D	150%
Unrated					100%

In cases where counterparty is rated by more than one ECAI, all available external ratings of the counterparty are captured and the following rules observed

- Where 2 recognised external ratings are available, the lower rating is to be applied; or
- Where 3 or more recognised external ratings are available, the lower of the highest 2 ratings will be used for the capital adequacy calculation purposes.

Bank of America Malaysia Berhad

Pillar 3 Disclosures

(a) Breakdown of Credit Risk Exposures by Risk Weights

Table 6.4: Exposures by Risk Weights

Risk Weights	Exposures After Netting and Credit Risk Mitigation (RM'000)							
	Sovereigns/ Central Banks	Insurance Cos, Securities Firm & Fund Managers	Banks, DFIs & MDBs	Corporates	Residential Mortgages	Other Assets	Total Exposures After Netting and Credit Risk Mitigation	Total RWA
30.06.2021								
0%	2,838,117	-	-	-	-	1,415	2,839,532	-
20%	-	-	192,046	-	-	-	192,046	38,409
35%	-	-	-	-	46	-	46	16
50%	-	39,059	136,925	11,894	-	-	187,878	93,939
100%	-	7,186	-	411,271	-	88,488	506,945	506,945
150%	-	-	-	951	-	-	951	1,427
Total as at 30 June 2021	2,838,117	46,245	328,971	424,116	46	89,903	3,727,398	640,736
RWA by Exposure	-	26,715	106,872	418,645	16	88,488		640,736
Average Risk Weight	0.000%	57.769%	32.487%	98.710%	35.000%	98.426%		17.190%
Deduction from Capital Base	-	-	-	-	-	-		
31.12.2020								
0%	3,332,310	-	-	-	-	768	3,333,078	-
20%	-	-	231,068	-	-	-	231,068	46,214
35%	-	-	-	-	83	-	83	29
50%	-	42,143	125,237	14,550	-	-	181,930	90,965
100%	-	59,962	-	469,376	-	26,898	556,236	556,236
150%	-	-	-	915	-	-	915	1,372
Total as at 31 December 2020	3,332,310	102,105	356,305	484,841	83	27,666	4,303,310	694,816
RWA by Exposure	-	81,034	108,832	478,023	29	26,898		694,816
Average Risk Weight	0.000%	79.363%	30.545%	98.594%	35.000%	97.224%		16.146%
Deduction from Capital Base	-	-	-	-	-	-		

Bank of America Malaysia Berhad

Pillar 3 Disclosures

(b) Breakdown of Credit Risk Exposures by ECAI Ratings

Table 6.5: Sovereigns / Central Bank Exposures by ECAI Ratings

	S&P	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated
	Moody's	AAA to Aa3	A1 to A3	Baa1 to Baa3	Ba1 to B3	Caa1 to C	
	Fitch	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	
	Total	1	2	3	4	5	
	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	
30.06.2021	2,838,117	2,838,117	-	-	-	-	-
31.12.2020	3,332,310	3,332,310	-	-	-	-	-

Table 6.6: Insurance Cos, Securities Firms & Fund Managers Exposures by ECAI Ratings

	S&P	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	Unrated
	Moody's	AAA to Aa3	A1 to A3	Baa1 to Ba3	B1 to C	
	Fitch	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	
	RAM	AAA to AA3	A1 to A3	BBB1 to BB3	B1 to D	
	Total	1	2	3	4	
	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000
30.06.2021	46,245	-	39,059	-	-	7,186
31.12.2020	102,105	-	91,818	-	-	10,287

Table 6.7: Banks, DFIs and MDBs Exposures by ECAI Ratings

	S&P	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated
	Moody's	AAA to Aa3	A1 to A3	Baa1 to Baa3	Ba1 to B3	Caa1 to C	
	Fitch	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	
	RAM	AAA to AA3	A1 to A3	BBB1 to BBB3	BB1 to B3	C1 to D	
	Total	1	2	3	4	5	
	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000
30.06.2021	328,971	122,705	182,521	12,142	-	-	11,603
31.12.2020	356,305	107,310	183,124	43,008	-	-	22,863

Table 6.8: Corporate Exposures by ECAI Ratings

	S&P	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	Unrated
	Moody's	AAA to Aa3	A1 to A3	Baa1 to Ba3	B1 to C	
	Fitch	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	
	RAM	AAA to AA3	A1 to A3	BBB1 to BB3	B1 to D	
	Total	1	2	3	4	
	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000
30.06.2021	428,076	-	-	-	-	428,076
31.12.2020	489,301	-	-	-	-	489,301

Bank of America Malaysia Berhad

Pillar 3 Disclosures

4.2.4 Credit Risk Mitigation

Credit Risk Mitigation (“CRM”) techniques include, where appropriate:

- Legally enforceable master netting agreements;
- Initial collateral or margin;
- Right to terminate transactions or to obtain collateral should unfavourable events occur;
- Right to call for collateral when certain exposure thresholds are exceeded; and/or
- Third party guarantees and credit default protection

On and Off-Balance Sheet Netting

Financial assets and financial liabilities are offset and the net amount reported in the statement of financial position when, and only when, there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously.

For derivatives counterparties, the Bank enters into master netting arrangements, which provide the Bank, in the event of a customer default, the right to offset the counterparty’s rights and obligations.

The Bank has not employed on or off-balance sheet netting to mitigate its credit exposures as of 30 June 2021.

Collateralised Transactions

The main types of collateral obtained by the Bank are in the form of cash, fixed deposits and residential properties. The Bank also pledges cash collateral on its own derivative positions.

Cash deposit and cash equivalents held in traditional Bank deposit platform are valued at nominal value stated for the instrument. Valuation is performed on quarterly basis if held in BAC or its subsidiaries’ accounts, and on monthly basis if held in other financial institutions.

Cash security taken as collateral should be denominated in the same currency as the underlying loan or in US Dollar, Malaysian Ringgit and Euro. In the event, there is any mis-match in currency exposure against the collateral provided, the Bank will require additional collateral to be pledged to mitigate the risk.

Collateral qualifies as CRM for regulatory capital purposes if:-

- Documentation conforms to the Basel requirements, binding on all parties and legally enforceable in all relevant jurisdictions;
- The credit quality of the counterparty and the value of collateral does not have a material positive correlation for the collateral to provide effective cover;
- There are clear and robust procedures for timely liquidation of collateral; and
- Collateral are appropriately valued and monitored both at origination and on an on-going basis. Collateral which lacks substantiated market value or clear right to accelerate and realize on collateral value will not be considered for CRM.

Bank of America Malaysia Berhad

Pillar 3 Disclosures

Guarantees and Credit Default Protection

The Bank routinely accepts contractual credit enhancements such as guarantees, Standby Letters of Credit, or other support issued by third party, such as the parent company, or other financial institution in favour of the Bank as CRM. Prior to acceptance of such credit enhancements for CRM purpose, Credit Officers assesses the credit strength of the Guarantor or support provider, including its financial willingness and motivation to support the borrower. Legal counsel for the Bank also reviews and opines on the strength and enforceability of all guarantees.

As at 30 June 2021, the Bank had not entered into any credit derivative transactions for credit default protection.

Risk Concentrations

Credit exposures arising from credit risk mitigation are included in and monitored through the concentration limits as described in "Credit Concentration Risk" under Section 4.2.

There is no material concentration of credit risk mitigation held as at 30 June 2021.

Credit Risk Mitigation under Comprehensive Approach

Subject to standard supervisory haircuts, where applicable, eligible cash collateral is deducted from the gross credit exposure for capital adequacy purpose. The net balance is then used as the basis of calculating the risk weighted asset and the resulting capital requirement.

Table 7.1: Credit Risk Mitigation as at 30 June 2021

Credit Risk Exposures 30.06.2021	Gross Exposures/ [^] EAD before [#] CRM	Exposures Covered by Guarantees	Exposures Covered by Eligible Financial Collateral	Exposures Covered by Other Eligible Collateral
	RM'000	RM'000	RM'000	RM'000
On-Balance Sheet Exposures:				
Sovereigns/Central Banks	2,838,117	-	2,838,117	-
Banks, Development Financial Institutions ("DFIs") & Multilateral Development Banks ("MDBs")	65,453	-	65,453	-
Insurance Cos, Securities Firms & Fund Managers	10,591	-	10,591	-
Corporates	188,513	-	188,513	-
Residential Mortgages	46	-	46	-
Other Assets	89,903	-	89,903	-
Defaulted Exposures	12,845	-	12,845	-
Total On-Balance Sheet Exposures	3,205,468	-	3,205,468	-
Off-Balance Sheet Exposures:				
OTC Derivatives	370,985	-	370,985	-
Off-Balance Sheet Exposures other than OTC Derivatives or Credit Derivatives	154,905	-	150,945	-
Total Off-Balance Sheet Exposures	525,890	-	521,930	-
Total On and Off-Balance Sheet Exposures	3,731,358	-	3,727,398	-

Bank of America Malaysia Berhad

Pillar 3 Disclosures

Table 7.2: Credit Risk Mitigation as at 31 December 2020

Credit Risk Exposures 31.12.2020	Gross Exposures/^EAD before *CRM	Exposures Covered by Guarantees	Exposures Covered by Eligible Financial Collateral	Exposures Covered by Other Eligible Collateral
	RM'000	RM'000	RM'000	RM'000
On-Balance Sheet Exposures:				
Sovereigns/Central Banks	3,332,310	-	3,332,310	-
Banks, Development Financial Institutions ("DFIs") & Multilateral Development Banks ("MDBs")	129,200	-	129,200	-
Insurance Cos, Securities Firms & Fund Managers	44,029	-	44,029	-
Corporates	260,666	-	260,666	-
Residential Mortgages	83	-	83	-
Other Assets	27,666	-	27,666	-
Defaulted Exposures	15,464	-	15,464	-
Total On-Balance Sheet Exposures	3,809,418	-	3,809,418	-
Off-Balance Sheet Exposures:				
OTC Derivatives	343,952	-	343,952	-
Off-Balance Sheet Exposures other than OTC Derivatives or Credit Derivatives	154,400	-	149,940	-
Total Off-Balance Sheet Exposures	498,352	-	493,892	-
Total On and Off-Balance Sheet Exposures	4,307,770	-	4,303,310	-

4.2.5 Off-Balance Sheet Exposures and Counterparty Credit Risk ("CCR")

CCR is the risk that the counterparty to a transaction could default or deteriorate in creditworthiness before the final settlement of a transaction's cash flow. Counterparties can include other financial institutions, corporate entities or individuals.

The Bank has off-balance sheet exposure comprising of banking products and Over-The-Counter ("OTC") derivatives exposures which are included under Pillar 1 capital requirement.

For regulatory capital, credit risk for a derivative contract is an estimate of the potential future changes in value (represented by the Notional amount of the contract multiplied by a credit conversion factor) and the replacement cost, which is the positive mark-to-market (MTM) value of the contract. A positive MTM is a credit exposure for the Bank since it is owed money - a counterparty default in this situation exposes it to a loss equivalent to the MTM. A negative MTM, on the other hand, means the Bank owes money to the counterparty and is not considered an exposure. Credit exposure is therefore asymmetric with respect to the underlying rate or price.

The exposure to CCR exposures is managed as part of the overall lending limits as described in "Credit Risk" under Section 4.2.

Collateral for Traded Products

Collateralisation is one of the key credit risk mitigation techniques available in the privately negotiated OTC Derivatives market. When facing derivative counterparties, the Bank, in appropriate circumstances, enters into collateral arrangements which provide the Bank, in the event of a customer default, the right to liquidate collateral.

Bank of America Malaysia Berhad

Pillar 3 Disclosures

The Bank also monitors the fair market value of the underlying securities used as collateral, including accrued interest, and, as necessary, requests additional collateral to ensure that the relevant transactions are adequately collateralized.

Collateral Reserves and Credit Ratings Downgrade

As at 30 June 2021, the Bank only accepts or post cash deposits as collateral to derivatives transactions, and does not hold or post any securities as collateral. There is no implication to the collateral value to be posted in the event of credit ratings downgrade, and as such no credit reserves are created for exposures which are secured in such manner.

Table 8.1: Off-Balance Sheet Exposures

	Principal Amount	Positive Fair Value of Derivative Contracts	Credit Equivalent Amount*	RWA
Off-Balance Sheet Exposures	RM'000	RM'000	RM'000	RM'000
30.06.2021				
Direct Credit Substitutes ¹	117,798	-	116,774	113,404
Transaction Related Contingent Items ²	69,797	-	34,600	33,359
Short Term Self Liquidating Trade-Related Contingencies ³	17,807	-	3,531	3,531
<u>Foreign Exchange Related Contracts</u>				
One Year or Less	14,965,528	54,306	181,552	111,784
Over One Year to Five Years	16,748	21	859	859
<u>Interest/Profit Related Contracts</u>				
One Year or Less	17,006,700	25,579	44,094	17,169
Over One Year to Five Years	8,158,500	29,580	144,480	57,363
Any commitments that are unconditionally cancelled at any time by the Bank without prior notice or that effectively provide for automatic cancellation due to deterioration in a borrower's creditworthiness	543,538	-	-	-
Total as at 30 June 2021	40,896,416	109,486	525,890	337,469
31.12.2020				
Direct Credit Substitutes ¹	139,911	-	138,870	131,867
Transaction Related Contingent Items ²	21,972	-	10,905	10,144
Short Term Self Liquidating Trade-Related Contingencies ³	23,307	-	4,625	4,625
<u>Foreign Exchange Related Contracts</u>				
One Year or Less	16,476,855	85,642	165,687	108,568
Over One Year to Five Years	84,663	150	4,312	4,237
<u>Interest/Profit Related Contracts</u>				
One Year or Less	10,612,000	16,844	28,242	12,972
Over One Year to Five Years	11,296,100	52,367	145,711	77,333
Any commitments that are unconditionally cancelled at any time by the Bank without prior notice or that effectively provide for automatic cancellation due to deterioration in a borrower's creditworthiness	833,395	-	-	-
Total as at 31 December 2020	39,253,543	155,003	498,352	349,746

* The credit equivalent amount is arrived at using the credit conversion factor as per BNM Policy Document

Key:

¹ Financial Guarantees

² Performance Guarantees

³ Documentary Credits & Letters of Credits

Bank of America Malaysia Berhad

Pillar 3 Disclosures

4.3 Market Risk

Market risk is the risk that changes in market conditions may adversely impact the value of assets or liabilities or otherwise negatively impact earnings of BAMB. Market risk is inherent in the financial instruments associated with the operations and activities engaged by BAMB and its market risk exposures are primarily in its trading portfolio.

The key market risk exposures are assessed at both aggregate and at the specific asset and liability level. At the asset and liability level, we assess market risk by evaluating the impact of individual risk factors on individual exposures such as interest rates and foreign exchange risk. At the aggregate level, BAMB's market risk is assessed using two key measures which are Value-at-Risk (VaR) and Bi-Weekly Maximum Observed Loss (MOL).

4.3.1 Market Risk Management Architecture

Market Risk Management function operates independently of the business to maintain objectivity. Its responsibilities include the overall measurement and monitoring of market risk.

4.3.2 Market Risk Management Control, Reporting and Oversight of Senior Management

BAMB's market risk is primarily managed through setting and active monitoring of market risk limits. Market risk limits provide thresholds that may not be exceeded without appropriate approval. Board and Senior Management approved limit structure is in place. Approval process is also in place to address temporary limit increases in accordance with delegated authorities.

Key market risk limits in BAMB are VaR and MOL. In addition, individual market risk factor controls such as foreign exchange net open position and dollar value of one basis point limits may also be implemented when deemed appropriate.

BAMB's Market Risk Management utilizes a suite of reports which assess risk on a daily basis. Key market risk information is reported to the Senior Management on a periodic basis. Limit excesses, temporary, and permanent limit changes are communicated to the Senior Management, LMT, RMC and the Board of Directors of BAMB.

Table 9.1: RWA and Capital Requirements for Market Risk

	30.06.2021	31.12.2020
	RM'000	RM'000
Total RWA for Market Risk	833,051	1,378,006
Capital Required for Market Risk	66,644	110,240
<u>Minimum Capital Requirement at 8% for:</u>		
Foreign Exchange Risk	15,004	72,479
Interest Rate Risk	51,640	37,761

Bank of America Malaysia Berhad

Pillar 3 Disclosures

4.4 Operational Risk

BAMB has adopted the Basel Committee definition of operational risk. Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. An operational loss event can be associated with any of the following seven Basel II operational loss event categories: internal fraud; external fraud; employment practices and workplace safety; clients, products and business practices; damage to physical assets; business disruption and system failures and execution, delivery and process management.

Operational Risk Capital

For the Pillar 1 capital requirements, BAMB uses the Basic Indicator Approach, whereby the average of three years' positive revenue is multiplied by a factor of 15%.

Governance and Organization Structures

Operational risk is managed by all employees as part of our day-to-day activities. Front line units and control functions own operational risk and are responsible for monitoring, assessing and testing the effectiveness of controls, while continuing to identify, escalate, debate and report operational risks. Front line units / control functions may have business oversight or control teams that support business leaders in the implementation of the program.

The Operational Risk management function is independent of front line unit / control function management, and consists of:

- The Program Owners, which is responsible for designing the program and overseeing its implementation and execution in accordance with the Policy and its supporting Standards;
- Group Compliance and Operational Risk Teams which are responsible for objectively assessing, challenging and advising the front line units / control functions on operational risk;
- Governance of BAMB's operational risk is accomplished through formal oversight by the Board, the Chief Risk Officer (CRO), Country Compliance Officer (CCO) and through LMT and risk oversight groups aligned to the BAC's overall risk governance framework and practices.

4.4.1 Local Operational Risk Management Framework

BAMB has a robust operational risk management framework. Within BAMB, the LMT is responsible for monitoring the Malaysia business operations. As noted above, the Businesses, which are represented within the LMT, are responsible for all the risks within the business including operational risks. Such risks are managed through corporate-wide or line of business specific policies and procedures, controls, and monitoring tools. Examples of these include data reconciliation processes, fraud prevention, transaction processing monitoring and analysis and business recovery planning.

4.5 Equity Exposures in the Banking Book

The Bank's banking book equity investments consist of unquoted shares held for socio-economic purposes. No equity risk arises from the equity investments.

The equity investments are classified as financial assets at fair value through other comprehensive income (FVOCI). Unrealised gains and losses arising from changes in fair value of the equity investments are recognised

Bank of America Malaysia Berhad

Pillar 3 Disclosures

in equity, net of income tax, until such investments are sold, collected or otherwise disposed of, or until such investments are determined to be impaired. Further details on valuation and accounting for financial assets at FVOCI are set out in the financial statements.

(a) Equity Investments by Type

Table 10.1: Holdings of Equity Investments by Type

	30.06.2021		31.12.2020	
	Gross Credit Exposure	Risk Weighted Assets	Gross Credit Exposure	Risk Weighted Assets
	RM'000	RM'000	RM'000	RM'000
Privately Held Shares for Socio-Economic Purpose	2,969	2,969	2,980	2,980

(b) Cumulative Realised Gains/(Losses)

Table 10.2: Realised Gains/(Losses) from Sale of Equity Holdings

	30.06.2021	31.12.2020
	RM'000	RM'000
<u>Realised gains recognised in profit and loss</u>		
Privately Held Shares for Socio-Economic Purpose	-	-

(c) Unrealised Gains/(Losses)

Table 10.3: Unrealised Gains/(Losses) from Sale of Equity Holdings

	30.06.2021	31.12.2020
	RM'000	RM'000
<u>Recognised in Other Comprehensive Income</u>		
Privately Held Shares for Socio-Economic Purpose	-	-

4.6 Interest Rate Risk / Rate of Return in the Banking Book (“IRRBB”)

IRRBB represents the risk to current or anticipated earnings or capital arising from adverse movements in interest rates.

BAMB assesses IRRBB through two complementary frameworks to cover both short and long term horizons:

- Economic Value of Equity (EVE) which captures a change in the net present value over the remaining life of the bank's assets, liabilities and off-balance sheet items; and
- Earnings at Risk (EaR) which captures changes to future profitability within a given time horizon covering short to medium term.

BAMB measures Earnings at Risk (EaR) by evaluating the gain or loss on interest rate sensitive items as a result of different interest rate environments using a static balance sheet approach over a 3 year horizon.

The Economic Value of Equity (EVE) framework measures the long-term Interest Rate Risk by incorporating both interest and principal cash flows and extends the measurement horizon to a maximum of thirty years. The EVE

Bank of America Malaysia Berhad

Pillar 3 Disclosures

metric computes the change in the present value of the remaining life in a runoff view, based on the principal and interest cash flows under different interest rate shock scenarios.

The disclosure of IRRBB below as at 30 June 2021 is as calculated in accordance with BNM Policy Document (BNM/RH/STD 029-43) issued on 30 June 2020. This policy document comes into effect on 1 January 2021 and reported monthly.

Table 11.1: Interest Rate Risk/Rate of Return Risk in the Banking Book as at 30 June 2021

	Scenario	MYR	USD	SGD	FCY (Others)	TOTAL
Economic Value Impact	Parallel 250 bps up	28,788	44,013	100	962	73,863
	Parallel 200 bps up	23,030	35,210	80	769	59,091
	Parallel 150 bps up	17,273	26,408	60	577	44,318
	Steepener	(12,399)	(16,989)	(25)	(360)	(29,772)
	Flattener	12,221	24,911	37	533	37,702
	Short Rate Up	20,335	37,051	56	799	58,241
	Short Rate Down	(20,335)	(37,051)	(56)	(799)	(58,241)
Earnings at Risk	Parallel 250 bps up	30,142	(4,806)	(31)	(300)	25,004
	Parallel 200 bps up	24,113	(3,845)	(25)	(240)	20,003
	Parallel 150 bps up	18,085	(2,884)	(19)	(180)	15,003

Table 11.2: Interest Rate Risk/Rate of Return Risk in the Banking Book as at 31 December 2020

Impact on Positions as at 31 December 2020			
100 basis points (Parallel Shift)			
Type of Currency	Earnings-at-risk		Economic Value Loss
	RM'000		RM'000
MYR	19,100		(14,680)
USD	1,208		(16,596)
Others	(116)		(361)
Total	20,192		(31,637)

Roles Accountabilities and Process Owners

In line with the Enterprise Interest Rate Risk Policy, the risk management process for IRRBB is adequately separated as follows:

- The IRRBB identification, measurement, and monitoring is performed by Balance Sheet Management and Treasury Finance ("BSMTF").
- The risk-taking and management function on IRRBB is performed by the Strategic Asset Liability Management ("SALM") team.
- The control functions are performed by CFO Market Risk team within Global Markets and Financial Risk ("GMFR").

BAMB manages its IRRBB on a centralized basis in order to remove this control function from individual Businesses.