


BANK OF AMERICA MALAYSIA BERHAD
(310983 V)

Basel II Pillar 3 Report

31 December 2012

This is to certify that Bank of America Malaysia Berhad's Basel II Pillar 3 Disclosure as at 31 December 2012, 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.



ONG GUAT KEE
Chief Executive Officer

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

1. SCOPE OF APPLICATION

Bank of America Malaysia Berhad – BAMB (“Bank” or “BAMB”) is a limited company, incorporated and domiciled in Malaysia. The holding company and ultimate holding company of the Bank are Bank America International Financial Corporation (“BIFC”) and Bank of America Corporation (“BAC”) respectively, both incorporated in the United States of America. The Bank is principally engaged in all aspects of the banking business and in the provision of related services. The Bank does not offer Islamic banking financing 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 guidelines issued by Bank Negara Malaysia (“BNM”) and other relevant regulatory bodies.

The Board of Directors and Local Management Team (“LMT”) of the Bank is responsible for ensuring that the Bank complies with global policies, procedures and corporate governance practices. These include policies relating to Basel II and in particular, the Internal Capital Adequacy Assessment Process (“ICAAP”) framework which is also a BNM requirement.

The LMT comprises of members from various functional areas of the Bank. The LMT is headed by the Country Executive. Other members of the LMT include Senior Sales officers (from Fixed Income, Currencies and Commodities (“FICC”), Corporate Banking (“CBK”), Corporate Banking Subsidiaries (“CBK-S”), Global Treasury Solutions (“GTS”) and Investment Banking (“IBK”), Country Operations Officer, Country Human Resources Manager, Country Finance Officer, Country Compliance Manager, Senior Officer - Treasury Management and Senior Officer – Risk Management.

ICAAP establishes a framework for the Bank to perform a comprehensive assessment of the risks they face and relate capital to those risks. The capital analysis performed by the Bank is expected to encompass all risks, not just the risks captured by the Basel II Pillar 1 minimum regulatory capital calculation. Successful risk identification and measurement requires having a comprehensive process to quantify, measure and aggregate these various risks in order to ensure that the Bank’s capital resources are sufficient to cushion volatility in earnings due to unexpected losses.

2.2. Total Risk-weighted Capital Ratio (“RWCR”) and Tier-I Capital Ratio

The capital adequacy ratios of the Bank are computed in accordance with BNM’s revised Risk-Weighted Capital Adequacy Framework (“RWCAF-Basel II”), and are as follows:

	<u>31.12.2012</u>	<u>(Restated)</u> <u>31.12.2011</u>
Tier-I Capital Ratio	59.03%	115.39%
Risk-Weighted Capital Ratio	59.09%	115.65%

Capital adequacy ratio for 2011 has been restated due to the changes in the accounting policy on collective assessment allowance for loans, advances and financing during the financial year. Further details of the restatement are disclosed in Note 30 to the financial statements. The minimum regulatory capital adequacy requirement is 8% of the RWCR.

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

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 Risk Weighted Capital Adequacy Framework guidelines.

31.12.2012						
Exposure Class	Gross Exposures/ EAD[^] before CRM[`] RM'000	Net Exposures/ EAD after CRM RM'000	RWA RM'000	RWA absorbed by PSIA*	Total RWA after effects of PSIA	Capital Req'ts RM'000
<u>Credit Risk</u>						
On-balance sheet exposures:						
Sovereigns/Central banks	1,140,662	1,140,662	-	-	-	-
Banks, Development Financial Institutions ("DFIs") & Multilateral Development Banks ("MDBs")	347,189	347,189	69,815	-	-	5,585
Corporates	135,563	135,563	129,081	-	-	10,326
Residential mortgages	1,292	1,292	705	-	-	56
Other assets	15,058	15,058	12,885	-	-	1,031
Defaulted exposures	182	182	178	-	-	14
Total on-balance sheet exposures	1,639,946	1,639,946	212,664	-	-	17,012
Off-balance sheet exposures:						
OTC derivatives	18,039	18,039	14,523	-	-	1,162
Off balance sheet exposures other than OTC derivatives or credit derivatives	128,861	127,796	121,699	-	-	9,736
Total off-balance sheet exposures	146,900	145,835	136,222	-	-	10,898
Total on- and off-balance sheet exposures	1,786,846	1,785,781	348,886	-	-	27,910
<u>Market Risk</u>						
	Long position	Short position				
Foreign currency risk	3,499	167,815	167,815	-	-	13,425
Interest rate risk			229,130	-	-	18,330
Total market risk exposure			396,945	-	-	31,755
<u>Operational Risk</u>						
			94,904	-	-	7,592
Total RWA and Capital Requirements			840,735	-	-	67,257

[^] Exposure at Default ("EAD"); [`] Credit Risk Mitigation ("CRM"); * Profit Sharing Investment Account ("PSIA")

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

31.12.2011			Net				
Exposure Class	Gross exposures/ EAD before CRM RM'000	EAD after CRM RM'000	RWA RM'000	RWA absorbed by PSIA	Total RWA after effects of PSIA	Capital Req'ts RM'000	
<u>Credit Risk</u>							
On-balance sheet exposures:							
Sovereigns/central banks Banks, Development Financial	1,163,343	1,163,343	-	-	-	-	-
Institutions ("DFIs") & Multilateral Development Banks ("MDBs")	227,473	227,473	59,686	-	-	4,775	
Corporates	130,174	130,174	120,377	-	-	9,630	
Residential mortgages	1,700	1,700	906	-	-	72	
Other assets	18,930	18,930	16,512	-	-	1,321	
Defaulted exposures	138	138	133	-	-	11	
Total on-balance sheet exposures	1,541,758	1,541,758	197,614	-	-	15,809	
Off-balance sheet exposures:							
OTC derivatives	33,126	33,126	28,629	-	-	2,290	
Off balance sheet exposures other than OTC derivatives or credit derivatives	118,969	118,251	110,008	-	-	8,801	
Total off-balance sheet exposures	152,095	151,377	138,637	-	-	11,091	
Total on- and off-balance sheet exposures	1,693,853	1,693,135	336,251	-	-	26,900	
<u>Market Risk</u>	Long position	Short position					
Foreign currency risk	1,919	5	1,919	-	-	154	
<u>Operational Risk</u>			85,017	-	-	6,801	
Total RWA and Capital Requirements			423,187	-	-	33,855	

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, statutory reserve fund and approved retained profits less net deferred tax asset.

There is no obligation to pay dividend to ordinary shareholders. No dividend has been paid or proposed for the financial period ending 31 December 2012.

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

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

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

	<u>31.12.2012</u> RM'000	(Restated) <u>31.12.2011</u> RM'000
<u>Tier-I Capital</u>		
Share capital	135,800	135,800
Statutory reserves	128,357	126,373
Retained profit	232,105	226,155
	<hr/>	<hr/>
	496,262	488,328
Less: Deferred tax asset	-	-
	<hr/>	<hr/>
Total Tier-I Capital	496,262	488,328
<u>Tier-II Capital</u>		
Collective assessment allowance*	539	1,076
	<hr/>	<hr/>
Total Capital Base	496,801	489,404
	<hr/> <hr/>	<hr/> <hr/>

* Excludes collective assessment allowance on impaired loans, advances and financing restricted from Tier-II Capital of the Bank of RM70,350 (2011: RM52,765).

4. **RISK MANAGEMENT**

BAC adopted a revised Risk Framework at the beginning of 2013, which the Bank follows. The following lays out BAC's risk management approach, risk appetite and philosophy and risk management processes:

4.1. **BAC Risk Management Approach**

BAC takes a comprehensive approach to risk management by fully integrating risk management with strategic, financial and customer/client planning so that goals and responsibilities align across the Company. BAC's risk appetite and risk exposures are aligned. BAC manages risk systematically, with a focus as a whole and by business, governance and control function ("GCF"), geography, legal entity (where appropriate), product, service and transaction. This holistic approach promotes the risk versus reward analysis needed to make informed strategic and business decisions. The risk management approach has five components:

- Risk culture;
- Risk appetite and philosophy;
- Risk governance and organization;
- Risk transparency and reporting; and
- Risk management processes, including the Identify, Mitigate, Monitor, and Report ("IMMR") risk management process.

Focusing on these five components allows the Company to effectively manage risks across the seven key risk types identified (strategic, credit, market, liquidity, operational, compliance and reputational risks) and across all LOBs and, where applicable, GCFs.

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

4.1.1 Defining BAC's Risk Appetite

BAC has a structured approach to choose when and how to take risks. BAC balances its capacity for risk commensurate with its capital and liquidity, while seeking to adhere to rules and regulations and protect its brand and reputation, its financial flexibility, the value of BAC's assets and the strategic potential of the franchise.

BAC's risk appetite statement (Risk Appetite Statement) collectively defines the risk appetite in both quantitative and qualitative terms for BAC. The Risk Appetite Statement is reviewed and approved by the BAC Board at least annually. The Risk Appetite Statement is rooted in several principles:

- **Limited overall risk capacity:** BAC's current overall target is for the bank holding company to achieve and maintain a risk profile consistent with appropriate, absolute and "relative to peers" credit indicators and capitalization objectives. BAC's risk capacity is limited so BAC evaluates and prioritizes risk-taking within its operating principles.
- **Financial strength to absorb risk:** BAC must maintain a strong and flexible financial position so it can weather challenging economic times and take advantage of growth opportunities. Therefore, BAC sets targets for earnings, capital and liquidity so it can consistently access financial markets at all times including under stressed market conditions.
- **Risk-reward equation:** Risks taken must align with BAC's risk appetite and offer attractive risk-adjusted returns for shareholders, while preserving asset values.
- **Acceptable risks:** Given the breadth of BAC's business and the importance of its reputation, BAC must be sensitive to all types of risk. An action in one business can harm BAC's reputation. Therefore, risks that unduly threaten BAC's reputation are escalated and restricted accordingly.
- **Skills and capabilities:** BAC seeks to only assume risks that the Company can identify and measure, mitigate and control, monitor and test and report and review.

4.1.2 Aligning BAC's Risk Appetite and Risk Profile

BAC provides diverse financial services and products globally and therefore inevitably faces a wide range of risks. BAC has implemented strong processes and controls to monitor its risk profile and keep risk taking aligned with risk appetite.

Risk limits ensure BAC's risk profile remains within the boundaries of the risk appetite, including consideration of potential stressed outcomes. Key risk governance committees set and monitor limits, with BAC Board oversight. Businesses and control functions then define additional or supporting risk limits through established governance processes (which include appropriate representatives from Global Risk Management ("GRM") and other GCFs as members) or at the direction of their respective executive officers.

The BAC Board reviews the strategic plan and the financial operating plan annually. With the BAC Board's input, executive management also make interim updates to the plans, when an imbalance exists between the targeted risk appetite and shareholder returns. BAC employs several key analytical processes to support appropriate business planning decisions. ICAAP is a rigorous, forward-looking capital management process for assessing overall capital adequacy. Stress testing helps BAC to better understand its risk profile, including balance sheet, earnings, capital and liquidity sensitivities in severe economic and business scenarios. Recovery and Resolution planning helps BAC manage its risks and structure, to prepare for a rapid and effective response to potential future financial crises. Subsidiary governance promotes the consistent application of controls and processes across BAC's subsidiaries to balance business results with risk profiles.

4.1.3 BAC Risk Management Process

On a day-to-day basis, BAC's employees are foremost responsible for managing risks threatening the interests of BAC and its shareholders. Employees are given 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). The LOBs are the most familiar with the risks they regularly face and they provide critical insights to help BAC better prepare for emerging risks and mitigate existing risks.

BAC employs a simple but effective overarching risk management process, referred to as IMMR. This process builds on employees' regular tasks and ensures a solid knowledge base for mitigating risk:

- **Identify and measure:** To be effectively managed, risks must be clearly defined, proactively identified and accurately measured. Proper risk identification focuses on recognizing and understanding existing risks, or risks that may arise from business initiatives, strategic actions or emerging external factors.
- **Mitigate and control:** BAC's risk mitigation processes and controls help manage exposure to risk. BAC mitigates and controls risk by establishing and communicating risk limits and controls through policies, standards and procedures that define responsibility and authority for risk taking. BAC provides limits for certain risk types and activities (e.g., loan underwriting, trading) that BAC clearly and consistently communicates to frontline employees. These limits are absolute (e.g., loan amount, trading volume) or relative (e.g., VaR, percentage of loan book in higher risk categories) and BAC's LOBs are expected to perform within these limits.
- **Monitor and test:** BAC monitors and tests risk levels regularly to ensure adherence to risk appetites, thresholds, policies and standards. BAC has multiple forms of monitoring and testing. An example of risk monitoring is the use of Key Risk Indicators (KRIs). Performance is measured at the business level against critical KRIs aligned to the businesses' breadth of risks. These measurements help measure the risk profile against the risk appetite. Through monitoring risks, BAC identifies whether risk limits are breached and has carefully designed processes to trigger appropriate steps to report and escalate issues. These steps may include immediate requests for approval to managers and alerts to executive management and the BAC Board (directly or through an appropriate Board-level committee).
- **Report and review:** Risk and compliance reporting provides an assessment of BAC's performance and the effectiveness of internal governance and control systems. Reports are regularly produced and distributed to the BAC Board, executive management and individual LOBs to prompt action when needed.

4.2. Credit Risk

Credit Risk is the risk of economic loss arising from the inability or failure of a borrower or counterparty to meet its repayment or delivery obligations.

BAC manages credit risk based on the risk profile of the borrower or counterparty, repayment sources, the nature of underlying collateral, and other supports given current events, conditions and expectations. Credit risk management starts with an assessment of the credit risk profile of the borrower or counterparty based on an analysis of their financial position. As part of the overall credit risk assessment of a borrower or counterparty, credit exposures are assigned a risk rating and are subject to approval based on defined credit approval standards. Subsequent to approving credit limits, risk ratings are monitored on an ongoing basis. If necessary, risk ratings are adjusted to reflect changes in the financial condition, cash flow or financial situation of a borrower or counterparty.

For Risk Management purposes, BAMB's focus is on quality of assets, return on those assets or the risk capital required on account of these assets, and selecting a target segment of corporates with strong credit profiles. BAMB examines its portfolio and monitors these factors on an ongoing basis. As a result, BAMB may exit relationships on account of credit concerns or inadequate returns for the risk capital required to continue the

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

lending relationship. BAMB believes that this exercise improves the overall quality of its credit portfolio, and makes the credit portfolio more resilient to industry and economic downturns

Ongoing monitoring has helped BAMB control credit quality and respond quickly to deterioration in credit profile of any particular borrower in a timely fashion.

Once credit has been extended, BAC has processes in place to monitor credit risk exposures at both the individual and portfolio levels, as well as to actively manage the portfolio to ensure that it fits BAC's desired risk and return goals.

At the borrower level, BAC reviews the risk inherent in the ongoing business of the borrower. At the portfolio level, BAC assesses aggregate losses, credit concentrations and potential stress scenarios. Regular portfolio reporting and business-specific credit reviews enable BAC to detect deteriorating credit trends, develop mitigation strategies and measure the effectiveness of actions taken.

Risk Management, as well as supporting units, is responsible for the ongoing management and administration of credit risk at the borrower level by:

- Monitoring borrower risk ratings on an ongoing basis, and if necessary, adjusting to reflect changes in the financial condition, cash flow, risk profile or outlook of a borrower or counterparty;
- Monitoring performance by updating the customer analysis and reviewing periodically;
- Monitoring collateral;
- 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;
- 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.

The credit underwriting and monitoring of BAMB is in line with BAC's global Core Credit Policy. Credit Officers perform due diligence which comprises of analysis of credit risk and preparation of approval memorandum including assignment of Risk Rating, identification of sources of repayment and credit risks, recommendation of facilities (including traded products with potential credit exposures) with required terms and conditions along with ensuring relevant Group Head Approvals are obtained in case concentration limits are breached. Credit approvals are provided in line with the following:

- **Corporate Accounts:** All credit exposures to corporations will be approved based on CCRO approval authority grid. Corporate Credit Risk Officer ("CCRO") Malaysia has delegated authority as the on-shore risk approver. All credit approvals require on-shore sign off in order to proceed. Escalation to higher levels (Singapore, Hong Kong and United States) are required based on the defined levels in the approval grid.
- **Financial Institutions Accounts:** All credit exposures to financial institutions will be approved based on Financial Institution Credit Risk Officer ("FICR") approval authority grid. Financial Institution Credit Risk Officer ("FICRO") Malaysia has delegated authority as the on-shore risk approver. All credit approvals require on-shore sign off in order to proceed. Escalation to higher levels (Singapore, India and United States) are required based on the defined levels in the approval grid.

The CCRO or FICR is responsible for ongoing monitoring and to initiate any Risk Rating changes or other exposure management measures as appropriate based on the performance of the Credit taker.

Credit Concentration Risk Management

BAC Risk Management has instituted a series of controls to encourage granularity and discourage concentrations of exposures in its credit portfolio. These controls consists of limits on overall exposure to specific types of risk or obligors, standards for credit quality metrics, as well various products and portfolio limits. These risk limits, which

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

are outlined in the Bank's Risk Appetite, will guide individual decision making with regards to the types of risk exposures.

Furthermore, BAMB is required to adhere to BNM regulations in regards to Single Borrower Limit, whereby exposure to a single borrower shall not exceed 25% of BAMB's Capital Base.

Credit concentration risk per the Bank's Risk Appetite is as follows:

- **House Guidelines:** The establishment of relationship limits is intended to reduce credit loss volatility through the achievement of a more granular portfolio. The House Guidelines define recommended maximum exposure levels to single obligors or a family of obligors based upon their risk profile, and are set well below Legal Lending Limits. The House Guidelines must consider all credit exposures including counterparty credit risk limits for derivatives, foreign exchange contracts, repurchase agreements and similar instruments.

The House Guidelines are reviewed and approved annually by the Credit Risk Committee ("CRC").

- **Industry Limits:** Represents the potential for changes in a given industry to impact credit quality at the Borrower and Portfolio level. The Bank actively monitors and manages Industry Risk on an individual transaction level and on an Enterprise-wide basis via the use of Industry Limits. Industry Limits help ensure appropriate portfolio diversification along industry lines, control concentration risk as appropriate and align individual decision-making with the Bank's overall risk appetite. Industry Limits are assigned to each of the Bank's industry groups. If warranted by the nature of the risk within an industry group, a sublimit may be established for a segment within an Industry Limit.
- **Country Risk:** includes all systemic risks of doing credit and investment business in and with a foreign country. Such systemic risks include sovereign default, suspension of hard currency payments, radical devaluation of currency, nationalisation of assets and other economic, political and social events in a foreign country that could interrupt the orderly repayment of obligations by the Bank's customers or adversely impact the Bank's financial interests in other ways.

Oversight of BAMB's Board and Senior Management

Credit approval, monitoring and control functions receive their authority and guidance from the Board and this is cascaded down to the functional level through the Risk Framework, Risk Appetite statement and approved Policies and Procedures. Senior management is well qualified and has significant experience in the industry. Senior management and line functionaries have adequate understanding demonstrated by low NPAs and reinforced by ongoing trainings.

The BAMB Board is responsible for monitoring the Malaysia business operations. The LOBs, which are represented within the BAMB Board, are responsible for all the risks within the business, including credit risks. Such risks are managed through corporate-wide or LOB-specific policies and procedures, controls, and monitoring tools.

Impaired Loans, Advances and Financing

The Bank assesses at each balance sheet date whether there is objective evidence that a financial asset or group of financial assets is impaired. A financial asset or a group of financial assets is impaired and impairment losses are incurred only if, there is objective evidence of impairment as a result of one or more loss events that occurred after the initial recognition of the asset ('a loss event') and that loss event (or events) has an impact on the estimated future cash flows of the financial asset or group of financial assets that can be reliably estimated.

The Bank may classify a loan/financing as impaired when any of the following criteria is met:

- the principal or interest or both is past due for 3 months or more;
- the amount outstanding has been in excess of the approved limit for 3 months or more;

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

- where the amount is past due, or amount outstanding has been in excess of the approved limit for less than 3 months, the loan/financing exhibits weaknesses that render a classification appropriate according to the Bank's credit risk grading framework; or
- where repayments are scheduled on intervals of 3 months or longer, as soon as a default occurs, unless it does not exhibit any weakness that would render it classified according to the Bank's credit risk grading framework.

Past Due 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.

Individual and Collective Impairment Provisions

The Bank first assesses whether objective evidence of impairment exists individually for loans and advances that are individually significant, and individually or collectively for loans and advances that are not individually significant.

If the Bank determines that no objective evidence of impairment exists for an individually assessed loans and advances, whether significant or not, it includes the asset in a group of loans and advances with similar credit risk characteristics and collectively assesses them for impairment.

If there is objective evidence that an impairment loss has been incurred, the amount of the loss is measured as the difference between the loans and advances' carrying amount and the present value of estimated future cash flows (excluding credit losses that have not been incurred) discounted at the original effective interest rate. The carrying amount of the loans and advances is reduced through the use of an allowance account and the amount of the loss is recognised in the profit or loss. If the loans and advances have a variable interest rate, the discount rate for measuring any impairment loss is the current effective interest rate determined under the contract.

For the purposes of a collective evaluation of impairment, loans and advances are grouped on the basis of similar risk characteristics, taking into account asset type, industry, geographical location, collateral type, past due status and other relevant factors. These characteristics are relevant to the estimation of future cash flows for groups of such assets by being indicative of the counterparty's ability to pay all amounts due according to the contractual terms of the assets being evaluated.

Future cash flows in a group of loans and advances that are collectively evaluated for impairment are estimated on the basis of the contractual cash flows of the assets in the group and historical loss experience for assets with credit risk characteristics similar to those in the group. Historical loss experience is adjusted based on current observable data to reflect the effects of current conditions that did not affect the period on which the historical loss experience is based and to remove the effects of conditions in the historical period that do not currently exist.

The methodology and assumptions used for estimating future cash flows are reviewed regularly by the Bank to reduce any differences between loss estimates and actual loss experience.

If, in subsequent periods, the amount of the impairment loss decreases and the decrease can be related objectively to an event occurring after the impairment was recognised, the previously recognised impairment loss is reversed by adjusting the allowance account. The amount of the reversal is recognised in the profit or loss.

When a loan is uncollectible, it is written off against the related allowance for loan impairment. Such loans are written off after all the necessary procedures have been completed and the amount of the loss has been determined. Subsequent recoveries of amounts previously written off are credited to profit or loss.

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

4.2.1. Breakdown of Gross Credit Exposures

(a) **By Geographical Distribution:**

31.12.2012 Category	Malaysia RM'000	United States RM'000	Singapore RM'000	India RM'000	Others RM'000	Total RM'000
Sovereign/Central banks	1,140,662	-	-	-	-	1,140,662
Banks, DFIs & MDBs	295,287	11,861	6,005	39,565	12,793	365,511
Corporates	260,590	-	54	-	3,497	264,141
Residential mortgages	1,292	-	-	-	-	1,292
Other assets	15,058	-	-	-	-	15,058
Defaulted exposures	182	-	-	-	-	182
Total credit exposures	1,713,071	11,861	6,059	39,565	16,290	1,786,846

31.12.2011 Category	Malaysia RM'000	United States RM'000	Singapore RM'000	India RM'000	Others RM'000	Total RM'000
Sovereign/central banks	1,163,343	-	-	-	-	1,163,343
Banks, DFIs & MDBs	160,127	22,736	7,903	56,382	5,253	252,401
Corporates	249,296	-	-	-	8,045	257,341
Residential mortgages	1,707	-	-	-	-	1,707
Other assets	18,910	-	20	-	-	18,930
Defaulted exposures	131	-	-	-	-	131
Total Credit Exposures	1,593,514	22,736	7,923	56,382	13,298	1,693,853

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

(b) By Sector Distribution:

31.12.2012 Category	Finance, Insurance and Business Services RM'000	Government and Government Agencies RM'000	Manufacturing RM'000	General Commerce RM'000	Mining and quarrying RM'000	Education, Health and Others RM'000	Purchase of Residential Landed Property, Securities and Transport Vehicles RM'000	Others RM'000	Total RM'000
Sovereign/ Central banks	-	1,140,662	-	-	-	-	-	-	1,140,662
Banks, DFIs & MDBs	365,511	-	-	-	-	-	-	-	365,511
Corporates	25,101	1,590	152,615	74,535	10,189	111	-	-	264,141
Residential mortgages	-	-	-	-	-	-	1,292	-	1,292
Other assets	13,835	-	-	-	-	-	1,093	130	15,058
Defaulted Exposures	-	-	-	-	-	-	182	-	182
Total Credit Exposures	404,447	1,142,252	152,615	74,535	10,189	111	2,567	130	1,786,846

31.12.2011 Category	Finance, Insurance and Business Services RM'000	Government and Government Agencies RM'000	Manufacturing RM'000	General Commerce RM'000	Mining and Quarrying RM'000	Education, Health and Others RM'000	Purchase of Residential Landed Property, Securities and Transport Vehicles RM'000	Others RM'000	Total RM'000
Sovereign/ Central banks	-	1,163,343	-	-	-	-	-	-	1,163,343
Banks, DFIs & MDBs	252,401	-	-	-	-	-	-	-	252,401
Corporates	9,245	1,590	182,261	57,097	7,148	-	-	-	257,341
Residential mortgages	-	-	-	-	-	-	1,703	4	1,707
Other assets	17,639	15	-	-	-	-	1,160	116	18,930
Defaulted exposures	-	-	-	-	-	-	131	-	131
Total Credit Exposures	279,285	1,164,948	182,261	57,097	7,148	-	2,994	120	1,693,853

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

(c) By Residual Maturity:

31.12.2012 Category	Up to 1 year RM'000	More than 1 year to 5 years RM'000	More than 5 years RM'000	Total RM'000
Sovereign/Central banks	1,140,647	-	15	1,140,662
Banks, DFIs & MDBs	359,302	6,209	-	365,511
Corporates	227,946	36,195	-	264,141
Residential mortgages	71	470	751	1,292
Other assets	14,008	339	711	15,058
Defaulted exposures	-	109	73	182
Total credit exposures	1,741,974	43,322	1,550	1,786,846

31.12.2011 Category	Up to 1 year RM'000	More than 1 year to 5 years RM'000	More than 5 years RM'000	Total RM'000
Sovereign/Central banks	1,163,343	-	-	1,163,343
Banks, DFIs & MDBs	249,120	3,281	-	252,401
Corporates	223,741	33,600	-	257,341
Residential mortgages	62	732	913	1,707
Other assets	17,658	210	1,062	18,930
Defaulted exposures	-	56	75	131
Total credit exposures	1,653,924	37,879	2,050	1,693,853

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 areas:

	<u>31.12.2012</u> RM'000	<u>31.12.2011</u> RM'000
<u>Malaysia</u>		
Purchase of residential landed property, securities and transport vehicles	943	882
Others	9	9
	<u>952</u>	<u>891</u>
Gross impaired loans as a % of gross loans, advances and financing	<u>0.53%</u>	<u>0.47%</u>

(b) Gross loans, advances and financing past due but not impaired, analysed by sector and geographical area:

	<u>31.12.2012</u> RM'000	<u>31.12.2011</u> RM'000
<u>Malaysia</u>		
Purchase of residential landed property, securities and transport vehicles	385	594

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

(c) Impairment provisions, analysed by sector and geographical area:

Individual Assessment Allowance

Malaysia

Purchase of residential landed property, securities and transport vehicles	761	751
Others	9	9

	770	760
	770	760

	<u>Malaysia</u> RM'000	<u>India</u> RM'000	<u>Total</u> RM'000
--	----------------------------------	-------------------------------	-------------------------------

Collective Assessment Allowance

31.12.2012

Finance, insurance and business services	75	24	99
General commerce	313	-	313
Manufacturing	94	-	94
Mining & quarrying	29	-	29
Purchase of residential landed property, securities, and transport vehicles	74	-	74

Total	585	24	609
	585	24	609

(Restated)

31.12.2011

Finance, insurance and business services	-	579	579
General commerce	231	-	231
Manufacturing	258	-	258
Purchase of residential landed property, securities, and transport vehicles	61	-	61

Total	550	579	1,129
	550	579	1,129

(d) Movement in individual assessment allowance by sector and geographical area:

	<u>Purchase of residential landed property, securities and transport vehicles</u> RM'000	<u>Manufacturing</u> RM'000	<u>Others</u> RM'000	<u>Total</u> RM'000
<u>In Malaysia</u>				
At 1 January 2012	751	-	9	760
Allowance made	68	-	-	68
Amount written off	-	-	-	-
Amount no longer required, written back	(58)	-	-	(58)
At 31 December 2012	761	-	9	770
	761	-	9	770

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

In Malaysia

At 1 January 2011	1,490	149	17	1,656
Allowance made	48	-	-	48
Amount written off	-	-	-	
Amount no longer required, written back	(787)	(149)	(8)	(944)
At 31 December 2011	751	-	9	760

(e) **Reconciliation of changes to loan impairment provisions:**

	<u>31.12.2012</u> RM'000	<u>31.12.2011</u> RM'000
<u>Individual Assessment Allowance</u>		
At beginning of financial year	760	1,656
Allowance made during the financial year	68	48
Write back made during the financial year	(58)	(944)
At end of financial year	770	760
<u>Collective Assessment Allowance</u>		
At beginning of financial year		
As previously stated	2,821	4,459
Effects of change in accounting policy	(1,692)	(1,301)
As restated	1,129	3,158
Write back made during the financial year	(520)	(2,029)
At end of financial year	609	1,129

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
- 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:

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

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 B3	BB+ to B-	100%
5	CCC+ to D	Caa1 to C	CCC+ to D	150%
Unrated				100%

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	0%	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 B3	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%	

Corporate

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
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

(a) Breakdown of Credit Risk Exposures by Risk Weights:

	Exposures After Netting and Credit Risk Mitigation (RM'000)						
	Sovereigns/ Central Banks	Banks, Development Financial Institutions & MDBs	Corporates	Residential Mortgages	Other Assets	Total Exposures After Netting and Credit Risk Mitigation	Total RWA
0%	1,140,662	-	-	-	2,173	1,142,835	-
20%	-	347,439	1,590	-	-	349,029	69,806
35%	-	-	-	624	-	624	218
50%	-	18,072	10,421	65	-	28,558	14,279
75%	-	-	-	610	-	610	458
100%	-	-	251,065	175	12,885	264,125	264,125
Total Exposures	1,140,662	365,511	263,076	1,474	15,058	1,785,781	
RWA by exposure	-	78,524	256,594	883	12,865		348,886
Average risk weight	0.00%	21.48%	97.54%	59.91%	85.57%		19.54%
Deduction from capital base	-	-	-	-	-	-	-

	Exposures After Netting and Credit Risk Mitigation (RM'000)						
	Sovereigns/ Central Banks	Banks, Development Financial Institutions & MDBs	Corporates	Residential Mortgages	Other Assets	Total Exposures After Netting and Credit Risk Mitigation	Total RWA
0%	1,163,343	-	-	-	2,418	1,165,761	-
20%	-	181,089	1,590	-	-	182,679	36,536
35%	-	-	-	809	-	809	283
50%	-	71,312	17,050	193	-	88,555	44,278
75%	-	-	-	707	-	707	530
100%	-	-	237,983	129	16,512	254,624	254,624
Total Exposures	1,163,343	252,401	256,623	1,838	18,930	1,693,135	
RWA by exposure	-	71,874	246,826	1,039	16,512		336,251
Average risk weight	0.00%	28.48%	96.18%	56.53%	87.23%		19.86%
Deduction from capital base	-	-	-	-	-	-	-

(b) Breakdown of Credit Risk Exposures by ECAI Ratings:

		Ratings of Sovereigns and Central Banks											
S&P	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated	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	Unrated	Fitch	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated
Total	1	2	3	4	5	Unrated	Total	1	2	3	4	5	Unrated
RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000
31.12.2012	1,140,662	-	-	-	-	-	1,140,662	-	-	-	-	-	-
31.12.2011	1,163,343	-	-	-	-	-	1,163,343	-	-	-	-	-	-

		Ratings of Banks, MDBs and FDIs											
S&P	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated	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	Unrated	Fitch	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated
RAM	AAA to AA3	A1 to A3	BBB1 to BBB3	BB1 to B3	C1 to D	Unrated	RAM	AAA to AA3	A1 to A3	BBB1 to BBB3	BB1 to B3	C1 to D	Unrated
Total	1	2	3	4	5	Unrated	Total	1	2	3	4	5	Unrated
RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000
31.12.2012	365,511	122	40,310	-	-	795	365,511	122	324,284	40,310	-	-	795
31.12.2011	252,401	193	10,462	147	-	47,923	252,401	193	193,676	10,462	147	-	47,923

		Ratings of Corporates									
S&P	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	Unrated	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	Bl to C	Unrated	Moody's	AAA to Aa3	A1 to A3	Baa1 to Ba3	Bl to C	Unrated
Fitch	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	Unrated	Fitch	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	Unrated
RAM	AAA to AA3	A1 to A3	BBB1 to BB3	B1 to D	Unrated	RAM	AAA to AA3	A1 to A3	BBB1 to BB3	B1 to D	Unrated
Total	1	2	3	4	Unrated	Total	1	2	3	4	Unrated
RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000	RM'000
31.12.2012	264,141	-	-	-	260,834	264,141	1,590	-	-	-	260,834
31.12.2011	257,341	-	-	-	255,751	257,341	1,590	-	-	-	255,751

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

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 31 December 2012,

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.

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. As at 31 December 2012, the Bank has not entered into any credit derivative transactions for credit default protection.

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

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 31 December 2012.

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.

<u>31.12.2012</u>	Gross Exposures before CRM RM'000	Exposures covered by Guarantees RM'000	Exposures covered by eligible financial collateral	Exposures covered by other eligible collateral
Exposure Class				
Credit Risk				
On-balance sheet exposures:				
Sovereigns/Central banks	1,140,662	-	-	-
Banks, Development Financial Institutions ("DFIs") & Multilateral Development Banks ("MDBs")	347,189	-	-	-
Corporates	135,563	-	-	-
Residential mortgages	1,292	-	-	-
Other assets	15,058	-	-	-
Defaulted exposures	182	-	-	-
Total on-balance sheet exposures	1,639,946	-	-	-
Off-balance sheet exposures:				
OTC derivatives	18,039	-	-	-
Off balance sheet exposures other than OTC derivatives or credit derivatives	128,861	-	1,065	-
Total off-balance sheet exposures	146,900	-	1,065	-
Total on- and off-balance sheet exposures	1,786,846	-	1,065	-

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

<u>31.12.2011</u> Exposure Class	Gross Exposures before CRM RM'000	Exposures covered by Guarantees RM'000	Exposures covered by eligible financial collateral	Exposures covered by other eligible collateral
<u>Credit Risk</u>				
On-balance sheet exposures:				
Sovereigns/central banks	1,163,343	-	-	-
Banks, Development Financial Institutions ("DFIs") & Multilateral Development Banks ("MDBs")	227,473	-	-	-
Corporates	130,174	-	-	-
Residential mortgages	1,700	-	-	-
Other assets	18,930	-	-	-
Defaulted exposures	138	-	-	-
Total on-balance sheet exposures	1,541,758	-	-	-
Off-balance sheet exposures:				
OTC derivatives	33,126	-		-
Off balance sheet exposures other than OTC derivatives or credit derivatives	118,969		718	-
Total off-balance sheet exposures	152,095	-	718	-
Total on- and off-balance sheet exposures	1,693,853	-	718	-

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. The Bank also monitors the fair market value of the underlying securities used as collateral, including accrued

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

interest, and, as necessary, requests additional collateral to ensure that the relevant transactions are adequately collateralized.

Collateral Reserves and Credit Ratings Downgrade

As at 31 December 2012, 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 secured in such manner.

31.12.2012 Description	Principal amount RM'000	Positive fair value of derivative contracts RM'000	Credit equivalent amount* RM'000	RWA RM'000
Direct credit substitutes ¹	52,208	-	52,208	47,021
Transaction related contingent Items ²	22,976	-	11,488	9,629
Short term self liquidating trade-related contingencies ³	1,438	-	287	171
Foreign exchange related contracts				
One year or less	2,175,436	3,966	18,039	14,523
Over one year to five years	-	-	-	-
Other commitments, such as formal standby facilities and credit lines, with an original maturity of up to one year	324,389	-	64,878	64,878
Total	2,576,447	3,966	146,900	136,222

31.12.2011 Description	Principal amount RM'000	Positive fair value of derivative contracts RM'000	Credit equivalent amount* RM'000	RWA RM'000
Direct credit substitutes	38,497		38,497	31,702
Transaction related contingent Items	20,763		10,382	8,543
Short term self liquidating trade-related contingencies	4,517		903	576
Foreign exchange related contracts				
One year or less	2,210,292	18,881	30,756	26,259
Over one year to five years	37,728	484	2,370	2,370
Other commitments, such as formal standby facilities and credit lines, with an original maturity of up to one year	345,937		69,187	69,187
Total	2,657,734	19,365	152,095	138,637

* The credit equivalent amount is arrived at using the credit conversion factor as per BNM Guidelines.

¹ Financial Guarantees; ² Performance Guarantees; ³ Documentary credits & LCs

4.3. Market Risk

Market risk is the risk that value of assets and liabilities or revenues will be adversely affected by changes in market conditions.

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

Market risk is inherent in BAMB's operations and arises from both trading and non-trading positions. Trading exposures represent positions taken in a wide range of financial instruments and markets which expose BAMB to various risks, such as interest rate and foreign exchange. BAMB manages these risks by using trading strategies and other hedging actions which encompass a variety of financial instruments in both the cash and derivatives markets. Non-trading exposures arise from its Corporate Treasury activities, as part of International Treasury, as a consequence of the mismatch of assets and liabilities in the banking book. Corporate Treasury is also exposed to market risk as a consequence of its use of derivatives to mitigate the risks associated from this mismatch.

4.3.1. Standardized Approach to Market Risk Capital

Under the Standardized Approach for market risk defined by BNM, the market risk capital charge is calculated at the BAMB level following the standardized supervisory formula. This leads to applying a charge on BAMB's net long, as well as matched, trading positions. The formula requires allocation of the trading exposures into time bands from which the charge is determined.

Since BAMB is required to maintain capital for market risks on an ongoing basis, the trading positions are marked-to-market on a daily basis. Derivative instruments include interest rate swaps and cross currency interest rate swaps. Derivatives are measured at their fair value and the resultant gain or loss is recognized in the profit and loss account. Valuation of outstanding derivative contracts is done on a Present Value basis at market rates in conformity with BAMB's global accounting norms.

RWA and Capital Requirements for Market Risk

	31.12.2012	31.12.2011
<u>Minimum Capital requirement at 8%</u>	RM'000	RM'000
Interest rate risk	13,425	-
Foreign exchange risk	18,330	154
Total RWA for market risk	396,945	1,919
Capital Required for Market Risk	31,755	154

4.4. Operational Risk

BAC defines operational risk as the risk of loss resulting from inadequate or failed internal processes, people, and systems, or from external events. BAC classifies Operational Risk using the Basel II Categories and definitions as follows: Internal Fraud, External Fraud, Employment Practices and Workplace Safety, Clients, Products, and Business Practices, Damage to Physical Assets, Business Disruption and System Failures, Execution, Delivery, and Process Management.

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 LOBs, which are represented within the LMT, are responsible for all the risks within the business including operational risks. Operational risk has been materially mitigated for BAMB because such risks are managed through corporate-wide or LOB 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.

Locally, the LMT is responsible for monitoring BAMB's business operations. The LOBs which are represented within the LMT are responsible for escalating operational risks. Risks are managed through entity-wide or LOB-specific policies and procedures, controls and monitoring tools.

BANK OF AMERICA MALAYSIA BERHAD
(310983 V)
Basel II Pillar 3 Report – 31 December 2012

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 available-for sale and measured at fair value in the financial statements. Unrealised gains and losses arising from changes in fair value of the equity investments are recognised 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 available-for-sale are set out in the financial statements.

(a) **Equity Investments by Type**

	Gross credit exposure RM'000	Risk-weighted assets RM'000
Privately held shares for socio-economic purpose		
31.12.2012	4,744	3,472
31.12.2011	4,341	3,069

(b) **Cumulative Realised Gains/(Losses)**

There are no realised gains/(losses) arising from sales and/or liquidation of equity holdings for the financial year ended 31 December 2012 (2011: nil)

(c) **Unrealised Gains/(Losses)**

	31.12.2012 RM'000	31.12.2011 RM'000
Recognised in revaluation reserve		
Privately held shares for socio-economic purpose	404	85

4.6. Interest Rate Risk /Rate of Return in the Banking Book ("IRRBB")

IRRBB represents the banking book's exposure to adverse movements in interest rates. IRRBB is measured as the potential volatility in non-trading net interest income caused by changes in market interest rates. Client facing activities, primarily lending and deposit-taking, create interest rate sensitive positions on the balance sheet.

The majority of assets lie with overnight placements and collateral portfolio required for regulatory or clearing purposes, and is maturity-match funded mainly by clients' deposits on the liabilities side. There is only a small amount of interest rate risk in the banking book.

Quantitative information on interest rate risk/rate of return risk in the banking book is presented in Note 28 B of the financial statements at 31 December 2012.