

Bank of America, N.A. (India Branches)

Basel III Pillar 3 Disclosures

As at June 30, 2020

Bank of America, N.A. (India Branches)

Basel III Pillar 3 Disclosures

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Table DF-2: Capital Adequacy

I. Qualitative disclosures

The Bank is required to comply with all applicable laws and regulations in India including guidelines issued by RBI and other relevant regulatory bodies.

The Internal Capital Adequacy Assessment Process ("ICAAP") document assesses the capital adequacy for the Bank and details the process by which this assessment is made based on a reference date and looking forward, over a three-year planning horizon ("ICAAP Planning Horizon").

ICAAP establishes a framework for banks 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 III 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.

The authority to develop the ICAAP document is delegated to the Finance department. The Bank's Chief Financial Officer ("CFO") is responsible for the production of ICAAP with inputs from Front Line Units ("Businesses "or "Business"), Independent Risk Management and Control Functions. Enterprise-wide functions, including Global Markets and Financial Risk ("GMFR") and Enterprise Capital Management ("ECM") also review the ICAAP to ensure adequate challenge and consistency with Enterprise practices.

The Bank has established an Internal Capital Guideline ("IGL") and maintains capital levels in excess of this guideline. IGL is set above minimum regulatory requirements to serve as an early warning signal to prompt action and avoid a capital breach.

The ICAAP document is presented to the Asset Liability Committee ("ALCO") and the Local Management Team ("LMT") for final review and approval on an annual basis. The ICAAP is also validated by Corporate Audit periodically, as required under RBI guidelines.

ICAAP is an integral management tool for determining the adequacy of the Bank's capital resources throughout the ICAAP planning horizon. It is also utilized to assess the risks being faced by the Bank and assess the adequacy of BANA India's capital under Baseline as well as Stress Scenarios over the ICAAP Planning Horizon. The ALCO and the LMT are responsible for acting at an early stage to prevent capital from falling below the minimum levels required to support risk characteristics.

Capital Requirements for Pillar 1 risks (i.e. Credit Risk, Market Risk and Operational Risk)

The Bank has adopted Standardized Approach ("SA") for credit risk, Standardized Duration Approach ("SDA") for market risk and Basic Indicator Approach ("BIA") for operational risk for computing its capital requirement.

Under the SA for credit risk, the Bank relies upon the ratings issued by the external credit rating agencies specified by the RBI for assigning risk weights for capital adequacy purposes under the Basel III guidelines. The risk weights applicable for claims against banks, sovereign, corporate and other Assets are as per the Basel III guidelines. In compiling the credit exposures, the Bank does not reduce cash collateral received if any, against credit exposures as eligible credit mitigants, as permitted by the RBI.

Under the SDA for computing the capital requirement for market risk, the Bank has adopted the "duration" method

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The minimum capital requirement for market risk is computed in terms of:

- "Specific risk" charge for each security, to protect against an adverse movement in the price of an individual security owing to factors related to the individual issuer.
- "General market risk" charge towards interest rate risk in the portfolio, where long and short positions in different securities or instruments can be offset.

Under the BIA, the Bank holds capital for operational risk equal to 15% of average positive gross annual income for the previous three financial years.

II. Quantitative disclosures

Capital Structure as on

<i>INR mm</i>	30-Jun-20	31-Mar-20
Common Equity Tier 1	111,620	110,092
Additional Tier 1	-	-
Tier 2	5,986	5,909
Total Capital Funds	117,606	116,001

Capital requirement and CRAR

<i>INR mm</i>	30-Jun-20	31-Mar-20
Capital requirements for credit risk:		
- Portfolios subject to standardized approach	59,192	62,542
- Securitization exposures	-	-
Capital requirements for market risk:		
Interest rate risk		
- General market risk	15,969	18,062
- Specific risk	-	-
Equity risk		
- General market risk	-	-
- Specific risk	-	-
Foreign exchange risk (including gold)	1,676	1,396
Capital requirements for operational risk: (Basic indicator approach)	6,071	6,071
Total Capital Requirements	82,909	88,071
Common Equity Tier I capital ratio	18.01%	16.72%
Tier I capital ratio	18.01%	16.72%
Tier II capital ratio	0.97%	0.90%
Total capital ratio	18.97%	17.62%

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Risk Exposure and Assessment

Risk management is a disciplined approach to identify, analyze, assess and control unacceptable risk to minimize the volatility of financial results, drive sustainable earnings and protect the Bank's brand and reputation. The Bank takes a comprehensive approach to risk management, integrating it with strategic, capital and financial operating plans. Risk management and capital utilization are integral parts of the strategic planning process and are considered throughout the process to align the Business strategies with capital considerations. This holistic approach promotes the risk versus reward analysis needed to make informed strategic and business decisions.

Bank of America's Risk Framework requires that strong risk management practices are integrated in key strategic, capital and financial planning processes and in day-to-day business processes, thereby ensuring risks are appropriately considered, evaluated and responded to in a timely manner.

The front line units have primary responsibility for managing risks inherent in their businesses. The bank employs an effective risk management process, referred to as Identify, Measure, Monitor and Control ("IMMC"), as part of its daily activities.

Some of the risks that the Bank is exposed to are described below:

- Credit risk is the risk of loss arising from the inability or failure of a borrower or counterparty to meet its obligations. BANA India manages credit risk to a borrower or counterparty based on its risk profile, which includes assessing repayment sources, underlying collateral, if any, and the expected effects of the current and forward-looking economic environment on the borrowers or counterparties. Underwriting, credit management and credit risk limits are proactively reassessed as a borrower's or counterparty's risk profile changes.
- Market risk is the risk of loss due to changes in the market values of the Bank's assets and liabilities caused by changing interest rates, currency exchange rates, and security prices. Market risk is inherent in the Bank'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 the Bank to various risks, such as interest rate risk, foreign exchange risk, etc. The Bank 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. Key market risk exposures are assessed at both specific and aggregate levels. At the specific level, market risk sensitivities are assessed by evaluating the impact of individual risk factors such as interest rates and foreign exchange. At the aggregate level, market risk is assessed using two key measures, which are Value-at-Risk ("VaR") and Bi-Weekly Maximum Observed Loss ("MoL").
- Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. BANA India manages the operational risks of its business activities using the enterprise-wide Operational Risk Framework. Enterprise Operational Risk policies, processes, tools, and standards are implemented by the Businesses/ECFs with Oversight from the Independent Business/ECF Risk Teams (Regional Function). Each have a quality assurance role and through direct action or Oversight, these stakeholders are collectively responsible for execution of the Operational Risk Program requirements, achievement of risk management objectives, and ensuring timely action is taken in response to concerns and issues.

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- Strategic risk is the risk resulting from incorrect assumptions about external or internal factors, inappropriate business plans (e.g., too aggressive, wrong focus, ambiguous); ineffective business strategy execution; or failure to respond in a timely manner to changes in the regulatory, macroeconomic or competitive environments in the geographic locations in which we operate (such as competitor actions, changing customer preferences, product obsolescence and technology developments).
- Liquidity risk is the inability to meet expected or unexpected cash flow and collateral needs while continuing to support our businesses and customers under a range of economic conditions. The primary objective of liquidity risk management is to ensure that BANA India can meet expected or unexpected cash flow and collateral needs while continuing to support our businesses and customers with the appropriate funding sources, under a range of economic conditions.
- Reputational risk is the risk that negative perceptions regarding BANA India's conduct or business practices may adversely impact its profitability or operations. Reputational risk may result from many of the bank's activities, including those related to the management of strategic, operational, compliance and credit risks. As a result, the potential impact to the bank's reputation of all our activities and all risks we face is evaluated. Reputational risk may arise from negative perception on the part of key stakeholders (e.g., customers, counterparties, investors, regulators, rating agencies), scrutiny from external parties (e.g., politicians, consumer groups, media organizations) and the ongoing threat of litigation. These reputational risk events could adversely impact the bank's financial standing through an inability to maintain or establish business relationships.
- Compliance risk is the risk of legal or regulatory sanctions, material financial loss or damage to the reputation of the Bank arising from the failure of the Bank to comply with the requirements of applicable laws, rules, regulations, related self-regulatory organizations' standards and codes of conduct. BANA India manages compliance risk through an integrated set of controls and processes to address external and internal risks, including a complex and dynamic regulatory environment and the evolving products, services and strategies of the front line units and control functions
- Interest Rate Risk in Banking Book (IRRBB) refers to the potential adverse financial impact on the Bank's net interest income from changes in interest rates. Due to the fundamental nature of its business, the Bank carries various interest sensitive assets and liabilities in its balance sheet. This exposes the Bank to risk on from changes in interest rates. These assets and liabilities essentially reside in the banking book. In other words, IRRBB refers to the risk associated with interest rate sensitive instruments that are not held in the trading book of the Bank. Interest rate risk in the trading book is covered in the market risk section.
- Credit concentration risk arises due to imperfect diversification of credit exposures in two ways. One, by having very large exposures to a small set of obligors due to which, default by a big customer could result in a huge loss. This is known as name (single/group) concentration risk. Second type of concentration is due to excessive exposure to a particular industry sector. It is observed that defaults in a particular industry sector are generally correlated. Hence, if an industry is under a severe recession, it could result in multiple defaults leading to huge losses.

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- Other Risks
 - **Securitization Risk**
The Bank, as of June 30, 2020, does not have any such investments. The bank has also not securitized any of its assets
 - **Settlement Risk** arises out of exposures on counterparties during the settlement of a deal when the Bank has performed its obligation in the contract and the counterparty is yet to perform its part (either delivery or payment). It is of transient nature; and may arise from counterparty default, operational problems, market liquidity constraints and other factors.
 - **Pension obligation risk** is the risk of a shortfall of pension funds available in the future to meet pension obligations for its eligible employees. The Bank provides for its pension liability which is a defined contribution scheme, for all its eligible employees.
 - **Model Risk** is the potential for adverse consequences from decisions based on incorrect or misused model output and reports. The Enterprise Model Risk Policy ("EMRP") provides comprehensive guidance for understanding monitoring, and managing model risk at Bank of America. The EMRP is consistent with applicable rules and regulations, and establishes a framework of corporate responsibilities and standards for effectively managing model risk across the enterprise.
 - **Risk of Under-estimation of Credit Risk under the Standardized Approach**
The use of standardized approach for calculating the Pillar 1 capital requirement in respect of credit risk is a conservative approach given the portfolio primarily consists of corporate customers with strong credit profiles and the credit risk in the portfolio is well managed by the credit risk management processes in place.

Risk Governance

BANA India has the following senior management level local committees or groups for risk governance.

Local Management Team ("LMT")

The LMT is chaired by the Country Executive Officer of the Bank. It is the primary body which provides strategic direction to the Bank and ensures compliance with regulatory requirements and the internal policies of the Bank. It is responsible for branch governance and oversight of branch operations. It is also responsible for reviewing and approving new business and products. It reviews the country performance with respect to strategic objectives. The LMT holds meetings six times in a financial year or more frequently if required. The LMT reviews and approves the ICAAP on an annual basis or upon any revision in the interim.

Asset Liability Committee ("ALCO")

The ALCO is chaired by the Country Executive Officer of the Bank. The ALCO is responsible for establishing policies and providing directives to manage the structural balance sheet risks arising over time, resulting from the Bank's business activities originating from the changing asset-liability mix. It provides management oversight of balance sheet, capital and liquidity management activities of the Bank. The ALCO holds meetings four times in a financial year or more frequently if required. The ALCO reviews and approves the ICAAP on an annual basis or upon any revision in the interim.

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Risk Management Committee ("RMC")

RMC is independently chaired by the Chief Risk Officer. RMC serves as an oversight body to provide strategic direction for a progressive risk management system and policies & strategy to be followed to mitigate the risks associated with the business. RMC comprises senior management of the Bank and representatives from front line units and relevant control & support functions. RMC meets at least on a quarterly basis.

Customer Service Committee ("CSC")

Customer Service Committee ("CSC") is responsible for activities relating to customer service and client services issues. CSC meets four times in a year. The committee is chaired by Head - Banking Operations.

Audit Council

The Audit Council assists LMT in exercising oversight of the effectiveness of the Bank's system of internal controls and policies and procedures for managing and accessing risk, integrity of the financial statements of the Bank, and compliance by the Bank with legal and regulatory requirements. The Council also provides direct oversight over the audit function. The Audit Council meets at least four times in a year.

The Audit council is mainly responsible for:

- Providing direction and overseeing the operation of the audit function in the Bank,
- Obtaining and reviewing half-yearly reports from the Compliance Officer, and
- Following up on issues raised in LFAR and discussing the financial statements

Technology Steering Committee ("TSC")

The TSC is chaired by the Chief Information Officer ("CIO"). The Technology Steering Committee (TSC) oversees projects in partnership with the Regional / Global Technology and other Functional teams across the Bank including common infrastructure or other projects cutting across businesses or support groups. The TSC meets at least six times in a year or more frequent, if required.

The TSC is mainly responsible for:

- To assist the Executive Management in implementing Information technology ("IT") Strategy that has been approved by the by global/regional and local management forums,
- Setting project priorities, reviewing critical project status and milestones,
- Monitoring IT governance, risk and controls, and
- Providing regular updates to the India LMT on significant Technology matter

Returns Governance Group ("RGG")

Returns Governance Group (RGG) was formed based on guidance by RBI in 'Approach Paper on Automated Data Flow from Banks' and guidance on Supervisory Program for Assessment of Risk and Capital (SPARC). RGG is the governance body responsible for providing oversight to all regulatory submissions, including Risk Based Supervision. RGG, as required by RBI shall inter-alia comprise of representatives from Compliance, Business, Technology, etc. and perform inter-alia the following roles.

- Act as the owner of all the layers indicated in the end state from the process perspective and in the context of automated submission systems, ensure governance around Data Acquisition, Data conversion and Data submission.

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- Provide oversight and guidance to Technology Steering Committee, which is currently managing the automation of regulatory reports, etc.
- Review and escalation point for Technology Steering Committee for handling change request for any new requirement by Reserve Bank and also handling ad-hoc queries.
- Ensuring governance that the metadata is as per the regulatory definitions.

Corporate Social Responsibility Committee:

As required by Section 135 of the Companies Act, 2013, the Bank has formed a Corporate Social Responsibility ('CSR') Committee to monitor the implementation of the Bank's CSR policy.

The CSR Committee is primary body for providing strategic direction to the Bank's CSR initiatives and ensuring compliance with the regulatory requirements and the internal policies of the Bank.

Table DF-3: Credit Risk: General Disclosures

I. Qualitative disclosures

Robust risk management policies and procedures are laid out in the Global Banking and Markets Core policy. It is supplemented by the Credit Compliance Manual. Written policies, procedures, standards, and guidelines are updated on a regular basis to provide a clear direction to officers for meeting the requirements for which they are accountable. Approval authority is vested via an Approval Grid which takes into account the quantum, internal risk rating and nature of exposure and the position/experience of the approver.

The Bank manages credit risk based on the risk profile of the borrower or counterparty, repayment sources, the nature of underlying collateral, and other support given current events, conditions and expectations. Credit risk management begins 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. High Value Proposals are subject to approvals by Credit Approval Council ("CAC"). Subsequent to loan origination, risk ratings are monitored on an ongoing basis. If necessary, risk ratings are adjusted to reflect changes in the financial condition and cash flow of a borrower or counterparty.

BANA India follows the policy of internal rating on a scale of Risk Rating ("RR") 1-11, and the RR is regularly monitored. Exposures with RR of 8 or worse (criticized assets) are subject to additional scrutiny and monitoring.

Unhedged Foreign Currency Exposure ("UFCE") of the borrower is an area of risk for the individual entity as well as for the entire financial system; as entities who do not hedge their exposure may incur significant losses due to exchange rate movements, which in turn can reduce their capability to service the loans taken from the banks. In line with the RBI circular dated January 15, 2014, BANA India has put in place a process to ascertain the amount of UFCE, estimate the extent of likely loss and riskiness due to UFCE, and provide for incremental capital & make incremental provision, as warranted.

In order to address concentration risk in banking industry the RBI has issued 'Guidelines of Enhancing Credit Supply' requiring banks to create additional provision and also apply additional risk weights on specified borrowers effective April 01, 2018. BANA India has put in place a process to ensure compliance with requirements of the said guidelines/directions.

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As per RBI guidelines relating to COVID-19 Regulatory Package dated March 27, 2020, April 17, 2020 and May 23, 2020, all commercial banks were permitted to grant a moratorium of three months on payment of all instalments falling due between March 1, 2020 and May 31, 2020 (further extended by three months till August 31, 2020). The Bank has laid down LMT approved policy for any borrower who wants to avail deferment period for a Term Loan / Overdraft facility.

Definitions

- **Overdue:** Any amount due to Bank under any credit facility is 'overdue' if it is not paid by the due date.

Norms for determining when to classify various types of assets as non-performing

- Term loans are treated as non-performing if the interest and/or installments of principal remain overdue for a period of more than 90 days.
- Cash credits & overdrafts are treated as non-performing if the accounts remain out of order for a period of more than 90 days.
- An account will be treated "out of order" if the outstanding balance remains continuously in excess of the sanctioned limit/drawing power. In case where the outstanding balance is less than the sanctioned limit/drawing power, but there are no credits continuously for 90 days as on balance-sheet date or credits are not enough to cover the interest debited during the same period, these accounts will be treated as out of order.
- Bills purchased/discounted are treated as non-performing if the bill remains overdue and unpaid for a period of more than 90 days.
- Any overdue receivables representing positive mark-to-market value of a foreign exchange and interest rate derivative contracts will be treated as non-performing asset if these remain unpaid for 90 days or more, upon becoming due
- Any other facility will be treated as non-performing if any amount to be received remains overdue for a period of more than 90 days during the financial year

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II. Quantitative disclosures

a. Total Gross credit exposures

<i>INR mm</i>	30-Jun-20	31-Mar-20
Fund Based	477,793	413,650
Non-Fund Based ¹	177,143	165,714

b. Geographic distribution

<i>INR mm</i>	30-Jun-20		31-Mar-20	
	Domestic	Overseas ²	Domestic	Overseas ²
Fund Based	477,793	-	413,650	-
Non-Fund Based ¹	177,143	-	165,714	-

¹Includes market as well as non-market related exposures

² As per the clarification given in the guidelines for Pillar 3 disclosures, definition of Overseas and Domestic should be as adopted for segment reporting in compliance with Accounting Standard- 17 issued by ICAI. As the Bank does not have any overseas operations, all exposures are reported under domestic exposures.

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c. Distribution of Exposures by sector / industry

INR mm

Sr.no	Particulars	30-Jun-20		31-Mar-20	
		Funded Exposure	Non Funded Exposure*	Funded Exposure	Non Funded Exposure*
1.	Agriculture & Allied Activities				
	Agri - Direct	-	-	-	-
	Agri - Indirect	199	28	75	20
	1. Total	199	28	75	20
2.	Industry (Micro & Small, Medium and Large)				
a.	Construction	3,767	1,511	4,025	1,223
b.	Gems & Jewellery	-	-	-	-
c.	Cement & Cement products	-	-	-	-
d.	Infrastructure	20,186	4,132	35,649	3,124
e.	Textiles	-	503	1	502
f.	Basic metal and metal products	5,900	4,192	8,940	3,849
g.	Mining and Quarrying	159	11	128	11
h.	All Engineering	15,222	7,382	15,324	10,575
i.	Chemicals and chemical products	34,756	2,300	37,434	2,241
j.	Petroleum, coal products and nuclear fuels	12,726	5,047	11,651	4,332
k.	Vehicles, vehicle parts and transport equipments	11,038	1,690	13,943	1,978
l.	Beverage & Tobacco	8,000	353	9,240	353
m.	Food Processing	7,597	46	5,824	56
n.	Other Industries	137	94	389	100
o.	Paper & paper products	631	86	633	91
p.	Rubber, plastic & their products	2,435	84	2,395	73
q.	Leather & leather products	-	-	-	-
r.	Wood and Wood products	-	-	-	-
s.	Glass and glassware	-	-	-	-
	2. Total	122,554	27,433	145,577	28,509
3.	Services				
c.	Aviation	-	650	-	651
d.	Shipping	-	-	-	-
e.	Commercial Real Estate	-	-	-	-
b.	Banks	6,560	69,633	10,729	100,561
a.	Non-banking financial companies (NBFCs)	29,614	7,365	49,192	6,307
t.	Computer Software	10,283	13,071	8,754	10,997
v.	Trade	14,956	2,006	13,046	2,099
f.	Other Services	281,211	53,758	172,727	13,257
e.	Professional and Other services	6,061	2,097	6,592	2,216
c.	Transport Operators	6,287	976	6,867	965
d.	Tourism Hotels and Restaurants	68	126	90	131
	3. Total	355,041	149,682	267,998	137,184
	Grand Total	477,793	177,143	413,575	165,694

* Includes market as well as non-market related exposures

Note: Previous year figures have been regrouped and reclassified wherever necessary to confirm to current year's presentation

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d. Residual contractual maturity pattern for assets.

As of June 30, 2020

INR mm

Particulars	Cash	Advances	Balance with RBI	Balances with other Banks	Fixed Assets	Investments	Other Assets
Next Day	41	1,146	564	216,384	-	141,999	681
2 - 7 days	-	17,576	-	-	-	-	1
8-14 days	-	10,404	-	-	-	-	18
15-30 days	-	35,590	5,839	-	-	30,742	-
31 days to 2 month	-	27,697	476	-	-	2,508	-
2-3 months	-	28,754	854	-	-	4,496	86,065
3-6 months	-	31,880	253	-	-	1,333	3,127
6 months to 1 year	-	12,714	409	-	-	2,156	-
1-3 years	-	23,317	2,621	-	-	22,720	-
3-5 years	-	1,094	1	-	-	-	-
5-7 years	-	-	-	-	-	0	-
7-10 years	-	-	1	-	-	-	-
10-15 years	-	-	-	-	-	0	-
Over 15 years	-	-	-	-	976	-	5,091
TOTAL	41	190,172	11,018	216,384	976	205,954	94,983

As of March 31, 2020

INR mm

Particulars	Cash	Advances	Balance with RBI	Balances with other Banks	Fixed Assets	Investments	Other Assets
Next Day	41	3,879	1,223	103,042	-	143,734	856
2 - 7 days	-	14,698	-	-	-	31,686	3
8-14 days	-	12,348	-	1,879	-	-	6
15-30 days	-	43,093	4,813	-	-	25,617	-
31 days to 2 month	-	27,937	1,537	-	-	8,182	-
2-3 months	-	22,948	1,192	-	-	6,344	103,116
3-6 months	-	49,716	416	-	-	2,211	4,568
6 months to 1 year	-	18,172	426	-	-	2,269	-
1-3 years	-	39,731	3,920	-	-	36,522	-
3-5 years	-	3,369	2	-	-	-	-
5-7 years	-	-	0	-	-	0	-
7-10 years	-	-	1	-	-	-	-
10-15 years	-	-	0	-	-	0	-
Over 15 years	-	-	-	-	1,131	-	5,554
TOTAL	41	235,891	13,530	104,921	1,131	256,565	114,103

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e. Amount of NPAs (Gross) – Nil (March 31, 2020 – Nil)

f. Net NPAs – Nil (March 31, 2020 – Nil)

g. NPA Ratios

- Gross NPA to Gross Advances – Nil (March 31, 2020 – Nil)

- Net NPA to Net Advances – Nil (March 31, 2020 – Nil)

h. Movement of NPAs (Gross)

<i>INR mm</i>	30-Jun-20	31-Mar-20
Opening balance	-	-
Additions during the year	-	2.24
Reductions during the period	-	2.24
Closing balance	-	-

i. Movement of provision for NPAs

<i>INR mm</i>	30-Jun-20	31-Mar-20
Opening balance	-	-
Provisions made during the year	-	0.56
Write-off	-	-
Write-back of excess provisions	-	0.56
Closing balance	-	-

k. Non-Performing Investments: Nil (March 31, 2020 – Nil)

l. Provisions for Non-Performing Investments – Nil (March 31, 2020 – Nil)

m. Movement of provision for Depreciation on Investments

<i>INR mm</i>	30-Jun-20	31-Mar-20
Opening balance	265	-
Provisions made during the year	-	265
Write-off	-	-
Write-back of excess provisions	216	-
Closing balance	49	265

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Table DF-4 - Credit Risk: Disclosures for Portfolios Subject to the Standardised Approach

I. Qualitative disclosures

The Bank adopts the following basis for assignment of risk weights for different categories of counterparties:

a. Scheduled Banks including foreign bank branches in India:

The bank has applied risk weights on exposures to scheduled banks for the purpose of Pillar 1 calculation in line with Basel III regulations as prescribed by RBI.

b. Foreign Banks:

Ratings for foreign banks have been sourced from websites of Fitch, Moody's and Standard & Poor's. The bank has applied risk weights relevant to the ratings assigned by international credit rating agencies as prescribed by RBI. In case of unrated exposures, bank has applied risk weights as prescribed by RBI guidelines.

c. Corporates:

Where the obligors have obtained rating of the facility from any of the accredited credit rating agencies viz. Brickwork Ratings India Pvt. Limited, Credit Analysis & Research Limited (CARE), CRISIL Limited, ICRA Limited (ICRA), India Ratings and Research Private Limited (Fitch), SME Rating Agency of India Ltd. (SMERA) as specified by the RBI, the Bank has applied the risk weights relevant to the ratings assigned by the credit rating agencies. Unrated corporate exposures have been risk weighted at 150% as per RBI guidelines.

II. Quantitative disclosures

a. Total Gross credit exposures

<i>INR mm</i>	30-Jun-20	31-Mar-20
Fund Based		
Below 100% risk weight	350,373	263,883
100% risk weight	6,802	7,102
More than 100% risk weight	120,619	142,665
Deducted	-	-
Total	477,793	413,650
<i>INR mm</i>	30-Jun-20	31-Mar-20
Non-Fund Based ⁵		
Below 100% risk weight	121,056	109,391
100% risk weight	1,352	1,694
More than 100% risk weight	54,735	53,629
Deducted	-	-
Total	177,143	165,714

⁵Includes market as well as non-market related exposures.

Bank of America, N.A. (India Branches)

Basel III Pillar 3 Disclosures

Leverage Ratio

As per RBI guideline DBR.No.BP.BC.58/21.06.201/2014-15 issued on January 8, 2015, Banks operating in India are required to make disclosure of the leverage ratio and its components from the date of publication of their first set of financial statements / results on or after April 1, 2015.

As per the instructions the disclosure is required to be made along with the Pillar 3 disclosures.

Quantitative disclosures

<i>INR mm</i>	30-Jun-20	31-Mar-20
Tier 1 Capital	111,620	110,092
Exposure Measure	900,084	867,339
Leverage Ratio (%)	12.40	12.69