

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

Basel III Pillar 3 Disclosures

As at March 31, 2024

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

Basel III Pillar 3 Disclosures

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2. Risk exposure and assessment
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Table DF-1: Scope of Application

Name of the entity to which the framework applies: **Bank of America N.A. (India branches)**

The Basel III Pillar 3 disclosures contained herein relate to Bank of America, N.A. – India Branches (hereafter referred to as the “the Bank” or “BANA India”) for the period ended Mar 31, 2024. Bank of America Corporation (“BAC” or “the Company”) has a subsidiary, Bank of America, N.A. (“BANA U.S.”) into which BANA India is consolidated. The Pillar 3 disclosures are compliant with Reserve Bank of India (the “RBI”) Master circular DOR.CAP.REC.15/21.06.201/2023-24 on BASEL III Capital Regulations dated May 12, 2023 and amendments if any made from time to time. The minimum capital requirement (including G SIB buffer) stands at 14.50% as of Mar 31, 2024.

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I. Qualitative disclosures:

The provisions of Accounting Standard ("AS") 21 - Consolidated Financial statements, AS 23 Accounting for Investments in Associates in Consolidated Financial statements & AS 27 - Financial Reporting of Interest in Joint Ventures, issued by The Institute of Chartered Accountants of India ("ICAI") and notified by the Companies (Accounting Standards) Rules 2006 do not apply to the Bank. BANA India has not invested its capital in any of the entities operating in India and owned by BAC. Further, the Bank does not have any interest in insurance entities. Hence the qualitative disclosures are only made for BANA India as a standalone entity.

a. List of group entities considered for consolidation.

Name of the entity / Country of incorporation	Whether the entity is included under accounting scope of consolidation (yes / no)	Explain the method of consolidation	Whether the entity is included under regulatory scope of consolidation (yes / no)	Explain the method of consolidation	Explain the reasons for difference in the method of consolidation	Explain the reasons if consolidated under only one of the scopes of consolidation
Not Applicable						

b. List of group entities not considered for consolidation both under the accounting and regulatory scope of consolidation.

Name of the entity / Country of incorporation	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity) INR Million*	% of bank's holding in the total equity	Regulatory treatment of bank's investments in the capital instruments of the entity	Total balance sheet assets (as stated in the accounting balance sheet of the legal entity) INR Million*
BofA Securities India Limited (formerly DSP Merrill Lynch Limited) / India *	Securities Broker/Dealer and Merchant Banker	35,354	NIL	Not Applicable	50,325

* Amounts are as per last audited financial statements (F.Y. ending March 31, 2023)

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II. Quantitative disclosures

c. List of group entities considered for consolidation.

Name of the entity / country of incorporation (as indicated in (i)a. above)	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)	Total balance sheet assets (as stated in the accounting balance sheet of the legal entity)
Not Applicable			

d. The aggregate amount of capital deficiencies in all subsidiaries which are not included in the regulatory scope of consolidation i.e. that are deducted:

Name of the subsidiaries / country of incorporation	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)	% of bank's holding in the total equity	Capital deficiencies
Not Applicable				

e. The aggregate amounts (e.g., current book value) of the bank's total interests in insurance entities, which are risk-weighted:

Name of the insurance entities / country of incorporation	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)	% of bank's holding in the total equity / proportion of voting power	Quantitative impact on regulatory capital of using risk weighting method versus using the full deduction method
Not Applicable				

f. Any restrictions or impediments on transfer of funds or regulatory capital within the banking

group: Disclosures for BANA India are given as a standalone entity and therefore this disclosure requirement is not applicable.

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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 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 Enterprise Financial Risk ("EFR") 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. Bank has set up a "Tripwire" above the IGL to serve as an early warning signal to prompt action and avoid a capital breach.

The ICAAP document is presented to the Asset Liability Council ("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 has availed Credit Risk Mitigation techniques (CRM) to the extent of securities placed under section 11(2) (b) of Banking Regulation Act 1949 for offsetting gross exposure of BANA Head office and overseas branches as per RBI Circular on Large Exposures Framework – CRM for offsetting – non-centrally cleared derivative transactions of foreign bank branches in India with their Head office dated Sept 9, 2021

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 Million</i>	31-Mar-24	31-Mar-23
Common Equity Tier 1	147,359	127,645
Additional Tier 1	-	-
Tier 2	14,976	9,906
Total Capital Funds	162,335	137,551

Capital requirement and CRAR

<i>INR Million</i>	31-Mar-24	31-Mar-23
Capital requirements for credit risk:		
- Portfolios subject to standardized approach	92,645	70,924
- Securitization exposures	-	-
Capital requirements for market risk:		
Interest rate risk		
- General market risk	21,371	15,409
- Specific risk	2,515	1,403
Equity risk		
- General market risk	-	-
- Specific risk	-	-
Foreign exchange risk (including gold)	1,817	1,754
Capital requirements for operational risk: (Basic indicator approach)	9,157	7,669
Total Capital Requirements	127,505	97,159
Common Equity Tier I capital ratio	16.76%	18.39%
Tier I capital ratio	16.76%	18.39%
Tier II capital ratio	1.70%	1.43%
Total capital ratio	18.46%	19.82%

Note: The capital reflected above excludes capital infused for CRM purposes.

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Risk Exposure and Assessment

Risk management is a disciplined approach to identify, analyse, 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 and risk appetite of the bank. The Risk Appetite is in alignment with the Bank's business strategy and is also integrated with the annual BANA India ICAAP which is a key document to review strategic plans. 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. BAC 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. Credit risk appetite metrics are included as part of the BANA India risk appetite metrics

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 10 Day Stressed Value at Risk ("SVaR"). both these measures are monitored as a part of the BANA India Risk Appetite Metrics.

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

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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. BANA India Operational Risk tolerance threshold is also included as part of BANA India Risk Appetite Metric.

- 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. The Branch uses Liquidity Risk Limits and Risk Indicators such as Liquidity Coverage Ratio, Leverage Ratio, Statutory Liquidity Ratio, Cash Reserve Ratio, Net Stable Funding Ratio, Loans to Deposit Ratio etc. to manage liquidity risk within risk appetite, identify a potential change in the Branch's risk profile, and ensure the amount of liquidity maintained at the Branch remains prudently sized under baseline and stressed 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. The bank faces reputational risk from changing external environment and failure to satisfy expectations about issues if our response is untimely, ineffective or not aligned to the needs of our employees, customers, clients and communities we serve. The bank manages reputational risk through established policies and controls in the business and risk management processes to mitigate reputational risks in a timely manner and through proactive monitoring and identification of potential reputational risk events.
- 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. Bank of America is committed to complying with applicable laws, rules and regulations governing the processes and activities of our front-line units and control functions in the jurisdictions in which we operate. Bank of America has no appetite for accepting compliance risk.
- 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

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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.

- Other Risks
 - **Securitization Risk**
It is not one of the primary business activities of BANA India to enter transactions either to securitize and sell its loans or to buy securitized loans from any other bank. The Bank, as of March 31, 2024, does not have any such investments nor has it 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.

The Bank computes credit exposure for market related off balance sheet products using the Current Exposure Method (CEM) and it captures the risk contained in the transactions that give rise to Counterparty Credit Risk (CCR) appropriately and satisfactorily

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- **People risk assessment:**

Considering the business profile and activities of the bank, the risk that business objectives will not be met due to human resource deficiencies is considered low. The bank has a strong focus on talent acquisition and succession planning as also on ensuring effective backups, which mitigates the impact on business due to changes in key positions. The annualized turnover rate and the capacity utilization (# Open positions/Total headcount) indicates a good level of stability and very limited bandwidth constraints. The number of conduct risk violations have been low and there has not been any history of internal frauds within the bank. There is a thrust on training and development which also ensures staff awareness and understanding on key policies, laws and regulations related to information privacy and protection, anti-money laundering, the risk framework, emergency preparedness, among others.

- **Technology risk assessment:**

The bank is reliant on global systems that are time tested and robust and the risk that arises from systems and/or tools that are deficient, unstable and/or overly complex is low. The client interface is automated and the processing capabilities with underneath reporting functionalities are well established. The bank's loss history is not material and there haven't been too many significant events over the last 3 years that are attributable to system failures.

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 at least once in two months 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 Council ("ALCO")

The ALCO is chaired by the Country Executive Officer of the Bank. It provides management oversight of the branch's balance sheet, capital, liquidity management and stress testing activities, consistent with the Bank's overall risk appetite for balance sheet, capital, liquidity management and stress testing. It also provides review and, as appropriate, approval of the branch-specific policies, processes, and contingency funding plans, as requested by the Council or required by regulation. The ALCO holds meetings four times in a

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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.

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,
- to determine scope of concurrent audit
- Following up on issues raised in LFAR and discussing the financial statements
- Follow up on all the issues/concerns raised in the inspection reports of RBI

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/control functions. The TSC conducts meetings at least once every quarter or more frequently 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, assessing strategic fit for Information Technology ('IT') proposals and reviewing critical project status and milestones,
- Monitoring IT Governance, project risk, technology operational risks and control processes
- 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 to Reserve Bank of India (Nov 2010) and guidance on Supervisory Program for Assessment of Risk and Capital (SPARC). RGG is the governance body responsible for providing oversight to

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all regulatory submissions, including Risk Based Supervision. RGG, as required by RBI comprise of representatives from Compliance, Business, Technology, etc. and perform the following roles.

- Act as Vigilante and Custodian and review the final submissions under RBS prior to submission to RBI
- Ensure timely and consistent submission of returns to RBI.
- Ensuring that the metadata is as per the Reserve Bank definitions and be an escalation point for any issues or errors relating to the regulatory reports / returns submitted to RBI.
- Prioritizing various returns and change request for any new/changed requirement/s by Reserve Bank and handling ad-hoc queries relating to RBS and CIMS.

Credit Approval Council ('CAC') –

CAC serves as a body for according credit sanction to high value proposals (defined as those requiring Level 2 approval as per the Enterprise Credit and Risk Approval Authority Grid) for the Bank. This is in accordance with RBI notification DBR.BP.BC.No.65/21.04.103/2016-17 on 'Risk Management Systems – Role of the Chief Risk Officer (CRO)'. The council will also review recommendations on identifying Willful Defaulters and Non-Cooperative Borrowers, annually review NPAs & exposure strategy and identify any other actions required in accordance with internal policies.

Table DF-3: Credit Risk: General Disclosures

I. Qualitative disclosures

Robust risk management policies and procedures are laid out in the Global Corporate & Investment Banking Risk 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.

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. 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.

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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. Credit risk appetite metrics are monitored as part of the BANA India risk appetite metrics

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 extant RBI guidelines on UFCE, 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.

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 for 90 days. In case where the outstanding balance is less than the sanctioned limit/drawing power, but there are no credits continuously for previous 90 days period 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

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

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II. Quantitative disclosures**a. Total Gross credit exposures**

<i>INR Million</i>	31-Mar-24	31-Mar-23
Fund Based	585,446	420,832
Non-Fund Based ¹	163,130	222,143

b. Geographic distribution

<i>INR Million</i>	31-Mar-24		31-Mar-23	
	Domestic	Overseas ²	Domestic	Overseas ²
Fund Based	585,446	-	420,832	-
Non-Fund Based ¹	163,130	-	222,143	-

¹Includes market as well as non-market related exposures

²As 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.⁴

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c. Distribution of Exposures by sector / industry

INR million

Sr.no	Particulars	31-Mar-24		31-Mar-23	
		Funded Exposure	Non Funded Exposure*	Funded Exposure	Non Funded Exposure*
I	Agriculture & Allied Activities				
	Agri - Direct	-	-	-	-
	Agri - Indirect	1,435	122	-	37
	I. Total	1,435	122	-	37
II	Industry (Micro & Small, Medium and Large)				
1	Construction	6,872	564	6,813	1,751
2	Gems & Jewellery	-	-	-	-
3	Cement & Cement products	176	-	-	-
4	Infrastructure	69,292	5,165	19,703	2,022
5	Textiles	-	493	-	493
6	Basic metal and metal products	5,476	793	1,564	1,275
7	Mining and Quarrying	-	-	-	-
8	All Engineering	18,139	13,259	20,662	10,824
9	Chemicals and chemical products	17,528	1,901	34,124	2,327
10	Petroleum, coal products and nuclear fuels	2,301	6,005	7,462	6,544
11	Vehicles, vehicle parts and transport equipments	30,959	4,196	22,504	3,243
12	Beverage & Tobacco	6,850	293	5,607	203
13	Food Processing	8,015	248	8,392	314
14	Other Industries	1,695	73	4,125	205
15	Paper & paper products	564	75	471	49
16	Rubber, plastic & their products	-	117	420	134
17	Leather & leather products	-	-	-	-
18	Wood and Wood products	-	-	-	-
19	Glass and glassware	-	-	-	-
	II. Total	167,867	33,182	131,847	29,384
III	Services				
1	Aviation	-	663	-	678
2	Shipping	-	-	-	-
3	Commercial Real Estate	-	-	-	-
4	Banks	17,796	85,416	15,868	135,912
5	Non-banking financial companies (NBFCs)	75,557	4,424	44,568	6,689
6	Computer Software	21,994	9,415	17,511	15,223
7	Trade	33,209	3,992	15,674	3,411
8	Other Services	263,861	22,859	187,973	27,642
9	Professional & Other Services	3,727	2,866	2,039	2,514
10	Transport Operators	-	191	5,352	595
11	Tourism & Hotels & Restaurants	-	-	-	58
	III. Total	416,144	129,826	288,985	192,722
	Grand Total	585,446	163,130	420,832	222,143

* Includes market as well as non-market related exposures

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d. Residual contractual maturity pattern for assets.

As of Mar 31, 2024

Particulars	INR Million						
	Cash	Advances	Balance with RBI	Balances with other Banks / FI	Fixed Assets	Investments	Other Assets
Next Day	36	1,733	11,360	43,399	-	420,680	15,270
2 - 7 days	-	6,324	-	-	-	8,336	188
8-14 days	-	20,293	-	-	-	8,330	442
15-30 days	-	23,887	9,967	-	-	52,262	3,689
31 days to 2 month	-	27,909	1,428	-	-	5,104	1,306
2-3 months	-	45,088	1,548	-	-	5,532	7,837
3-6 months	-	36,862	1,099	-	-	3,927	11,261
6 months to 1 year	-	38,483	867	-	-	3,095	12,151
1-3 years	-	57,186	13,332	-	-	47,651	20,049
3-5 years	-	16,615	0	-	-	1	9,595
5-7 years	-	-	1	-	-	4	10,490
7-10 years	-	-	-	-	-	-	8,336
10-15 years	-	-	0	-	-	6,272	-
Over 15 years	-	-	-	-	1,778	40,402	6,436
TOTAL	36	274,380	39,601	43,399	1,778	601,596	107,050

As of Mar 31, 2023

Particulars	INR Million						
	Cash	Advances	Balance with RBI	Balances with other Banks / FI	Fixed Assets	Investments	Other Assets
Next Day	40	4,597	6,070	116,856	-	189,409	16,760
2 - 7 days	-	7,459	-	-	-	-	753
8-14 days	-	10,511	-	-	-	4,103	510
15-30 days	-	23,223	9,022	-	-	52,578	5,653
31 days to 2 month	-	34,232	1,507	-	-	29,884	736
2-3 months	-	18,375	978	-	-	3,477	6,750
3-6 months	-	46,417	733	-	-	2,606	11,820
6 months to 1 year	-	20,682	754	-	-	2,679	13,172
1-3 years	-	28,952	10,023	-	-	54,540	22,256
3-5 years	-	12,713	1	-	-	3,915	13,695
5-7 years	-	-	1	-	-	5	3,099
7-10 years	-	-	-	-	-	-	14,785
10-15 years	-	-	0	-	-	0	5
Over 15 years	-	-	-	-	1,785	17,769	5,321
TOTAL	40	207,161	29,087	116,856	1,785	360,965	115,315

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

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e. Amount of NPAs (Gross) – Nil (March 31, 2023 – Nil)

f. Net NPAs – Nil (March 31, 2023 – Nil)

g. NPA Ratios

- Gross NPA to Gross Advances – **Nil** (March 31, 2023 – Nil)
- Net NPA to Net Advances – **Nil** (March 31, 2023 – Nil)

h. Movement of NPAs (Gross)

<i>INR Million</i>	31-Mar-24	31-Mar-23
Opening balance	-	-
Additions during the year	78	5,346
Reductions during the period	78	5,346
Closing balance	-	-

i. Movement of provision for NPAs

<i>INR Million</i>	31-Mar-24	31-Mar-23
Opening balance	-	-
Provisions made during the year	19	1,337
Write-off	-	-
Write-back of excess provisions	19	1,337
Closing balance	-	-

j. Non-Performing Investments: Nil (March 31, 2023 – Nil)

k. Provisions for Non-Performing Investments – Nil (March 31, 2023 – Nil)

l. Movement of provision for Depreciation on Investments

<i>INR Million</i>	31-Mar-24	31-Mar-23
Opening balance	1,469	602
Provisions made during the year	21	867
Write-off	-	-
Write-back of excess provisions	-	-
Closing balance	1,490	1,469

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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 as prescribed by 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 as per extant RBI guidelines.

RBI has prescribed following domestic rating agencies – Acuite , CARE, CRISIL, ICRA, India Ratings, INFOMERICS. International Rating agencies – FITCH , Moody , Standard & Poor

II. Quantitative disclosures

a. Total Gross credit exposures

<i>INR Million</i>	31-Mar-24	31-Mar-23
Fund Based		
Below 100% risk weight	378,427	289,169
100% risk weight	16,965	20,686
More than 100% risk weight	190,054	110,977
Deducted	-	-
Total	585,446	420,832

<i>INR Million</i>	31-Mar-24	31-Mar-23
Non-Fund Based ⁵		
Below 100% risk weight	94,092	141,959
100% risk weight	5	-
More than 100% risk weight	69,033	80,184
Deducted	-	-
Total	163,130	222,143

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

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Table DF-5: Credit Risk Mitigation: Disclosures for Standardized Approaches

I. Qualitative disclosures

In determining credit risk capital, the Bank has not reduced the facility amounts by any corresponding eligible collateral amount in the form of cash margins.

The risk weighted assets are computed based on the gross outstanding facility amount.

II. Quantitative disclosures

In compiling the credit exposures, the Bank has availed Credit Risk Mitigation techniques (CRM) to the extent of securities placed under section 11(2) (b) of Banking Regulation Act 1949 for offsetting gross exposure of BANA Head office and overseas branches as per RBI Circular on Large Exposures Framework – CRM for offsetting – non-centrally cleared derivative transactions of foreign bank branches in India with their Head office dated Sept 9, 2021. Further the bank has considered the benefit of variation margin received in netting the market exposure of clients having valid ISDA agreements as per extant Basel III Capital regulations.

INR Million

Particulars	31-Mar-24	31-Mar-23
Total Exposure covered by deposit under section 11(2)(b) designated as Credit Risk Mitigation	36,522	33,020
Total Exposure against which CSA netting has been applied	52,470	-

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Table DF-6: Securitization Exposures: Disclosure for Standardized Approach

I. Qualitative disclosures

There are no securitization transactions originated by the Bank.

II. Quantitative disclosures**A. Banking Book**

Total amount of exposures securitized by the Bank: **Nil** (March 31, 2023: Nil)

Amount of assets intended to be securitized within a year: **Nil** (March 31, 2023: Nil)

Total amount of assets securitized and unrecognized gain or losses on sale: **Nil** (March 31, 2023: Nil)

Aggregate amount of on-balance sheet and off-balance sheet securitization exposures purchased and break-up by exposure type

<i>INR Million</i>	31-Mar-24		31-Mar-23	
	Exposure Type	Exposure Amount	Exposure Type	Exposure Amount
On Balance Sheet	-	-	-	-
Off Balance Sheet	-	-	-	-
Total	-	-	-	-

Securitization exposures purchased and the associated capital charge by different risk weight bands

<i>INR Million</i>	As at 31-Mar-24			As at 31-Mar-2023		
	Exposure	Risk Weighted Assets	Capital Requirement	Exposure	Risk Weighted Assets	Capital Requirement
Below 100% risk weight	-	-	-	-	-	-
100% risk weight	-	-	-	-	-	-
More than 100% risk weight	-	-	-	-	-	-
Total	-	-	-	-	-	-

Securitization Exposures deducted entirely from Tier 1 capital, credit enhancing Interest Only Strips (I/Os) deducted from total capital, and other exposures deducted from total capital: Nil (March 31, 2023: Nil)

B. Trading book

- Aggregate amount of exposures securitised by Bank for which bank has retained some exposures and which is subject to market risk approach: **Nil** (March 31, 2023: Nil)
- Aggregate amount of on-balance sheet securitisation exposures retained or purchased: **Nil** (March 31, 2023: Nil)
- Aggregate amount of off-balance sheet securitisation exposures: **Nil** (March 31, 2023: Nil)

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- Aggregate amount of securitization exposures retained or purchased subject to Comprehensive Risk Measure for specific risk : **Nil** (March 31, 2023: Nil)
- Aggregate amount of securitization exposures retained or purchased subject to securitization framework for specific risk broken into different risk weight bands: **Nil** (March 31, 2023: Nil)
- Aggregate amount of capital requirements for the securitisation exposures subject to securitisation framework: **Nil** (March 31, 2023: Nil)
- Securitisation Exposures deducted entirely from Tier 1 capital, credit enhancing Interest Only Strips (I/Os) deducted from total capital, and other exposures deducted from total capital: **Nil** (March 31, 2023: Nil)

Table DF-7: Market Risk in Trading Book

I. Qualitative disclosures

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 10 Day Stressed Value at Risk ("SVaR").

VaR is a statistical measure of potential portfolio market value loss resulting from changes in market variables, during a given holding period, measured at a specified confidence level. The Branch uses historical simulation approach for VaR and it is calculated over a one-day holding period at a 99% confidence level, using three years of historical data. The performance of VaR model is monitored through daily back-testing and is performed at both Entity and Line of Business (LoB) level. SVaR is a form of stress test and it is calculated for the most volatile 1 year period of the historical period going back to 1/15/2007, averaging expected loss from 7 worst days of the volatile year. This metric uses a 10 day holding period. Both these measures are monitored as a part of the BANA India Risk Appetite Metrics.

VaR and SVaR are supplemented with stress tests, which are performed to assess extreme tail events or shocks. The stress tests are designed to highlight exposures to unlikely but plausible events or extremely volatile conditions, both hypothetically and historically.

Market Risk Management Architecture

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The market risk function is independent of the front office and monitors all prudential limits governing trading activities and reports exceptions to senior management.

Market Risk Management Control

Market risk of the Branch is primarily managed through establishing and monitoring limits. Investment policy and FX/derivatives policy of the Branch (or BANA Mumbai) lists the applicable limits and approval processes.

Market Risk Management utilizes a suite of reports which assess risk on a daily basis. These reports are distributed to Senior Management on daily basis. Limit excesses, limit changes (temporary, or permanent) are communicated to Senior Management, as well as to relevant forum such as the LMT, Risk management Committee and the ALCO where applicable.

Market Risk Management Policies and Procedures:

The Market Risk Management is guided by market risk policies and guidelines. Global market risk management policy is in place and is followed. The policy describes how market risk is managed by establishing the key market risk measures, defining roles and responsibilities and describing key monitoring processes in place. In addition, the Investment policy and FX/derivatives policy of the Branch lists the applicable limits and approval processes.

The market risk capital requirement is expressed in terms of two separately calculated charges:

- General market risk charge from the interest rate risk in the portfolio in different securities or instruments.
- Specific risk charge for each security, which is designed to protect against an adverse movement in the price of an individual security owing to factors related to the individual issuer.

For regulatory capital, the requirements for general market risk are designed to capture the risk of loss arising from changes in market prices and interest rates. The capital charge is the sum of four components:

- the net short or long position in the whole trading book.
- a small proportion of the matched positions in each time-band - vertical disallowance.
- a larger proportion of the matched positions across different time bands - horizontal disallowance.
- a net charge for positions in options.

The general market risk charge is measured by using the modified duration method. Foreign exchange open positions are considered at higher of limit or actual.

II. Quantitative disclosures

INR Million

Capital requirements for:

Interest rate risk

- general market risk

31-Mar-24

31-Mar-23

21,371

15,409

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- specific risk	2,515	1,403
Equity position risk	-	-
- general market risk	-	-
- specific risk	-	-
Foreign exchange risk	1,817	1,754
Total	25,703	18,566

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Table DF-8: Operational Risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events.

Operational Risk Events: inadequate or failed internal processes, people, systems and external events may result in unexpected or undesired consequences including a financial loss, an unexpected gain, a near miss and/or an opportunity cost (lost future revenue). The events associated with these unintended and/or undesired consequences are termed as operational risk events.

Operational Loss: an operational loss is the recorded financial consequence (excluding insurance reimbursements or tax effects) resulting from an operational loss event, including all expenses associated with an operational loss event except for opportunity costs, foregone revenue, and costs related to risk management and control enhancements implemented to prevent future operational losses. Operational loss events can also result in unintended financial gains. BAC classifies operational losses using the Basel II categories and definitions: 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.

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.

Governance of Operational Risk

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 at Bank of America (BAC) is independent of front-line unit / control function and is responsible for designing the program and overseeing its implementation and execution in accordance with the Policy and its supporting Standards. Operational Risk Teams are also responsible for objectively assessing, challenging and advising the front-line units / control functions on operational risk.

Governance of BANA India's operational risk is accomplished through formal Oversight by the BAC Board, the CRO and through LMT and risk Oversight groups aligned to the BAC's overall risk governance framework and practices.

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Risk Management Process

BAC's Operational Risk Management Program has been built around ten interrelated requirements that are set out in the Operational Risk Management - Enterprise Policy, which also specifies the responsibilities and accountabilities of the first and second lines of defense. These requirements work together to drive a comprehensive risk-based approach for the proactive identification, management, mitigation and escalation of operational risks throughout the Company. These ten core requirements are:

1. Operational Risk Appetite.
2. Key Risk Indicators (KRIs)
3. Risk and Control Self-Assessment (RCSA)
4. Scenario Analysis
5. Internal Operational Loss Event Data (ILD)
6. External Operational Loss Event Data (ELD)
7. Quality Assurance (QA) Program
8. Operational Risk Coverage Plans
9. Operational Risk Reporting and Escalation
10. Operational Risk Capital Model Oversight

Certain elements of BAC's operational risk program may only be performed at global level and/or at regional level.

While BANA India has adopted 'Operational Risk Management - Enterprise Policy' which establishes and defines the requirements and accountabilities for managing operational risk at the Bank, the India Operational Risk Policy (IORP) was developed and approved at the LMT in Oct 2019 and is periodically reviewed. IORP is created as a supplement to the Enterprise Policy to bring out only those aspects of the extant regulations which are additionally applicable to the Bank's activities in India. The Enterprise Operational Risk Management Policy and the IORP will apply to all the branches of Bank of America, N.A., operating in India ("BANA, India" or "the Bank"). The Bank globally has merged Compliance and Operational Risk functions in order to drive operational excellence within Bank of America. Combining the two has resulted in better linkages between compliance failures and operational losses and enable us to better manage compliance and operational risks through combined taxonomies and tools, a common framework, holistic view on issues related to people, process, technology, and external events, whether they result from compliance failures or losses from specific operations. However, in light of the RBI guidelines on management of Operational Risk, while the integrated teams will continue to streamline and leverage on the common processes, the India Chief Risk Officer will continue to have oversight and supervisory responsibilities over the India Operational Risk function and as such the BANA India Operational Risk Officer will also continue to provide necessary updates directly to the Risk Management Committee of the Bank in India. BANA India Operational Risk tolerance threshold is also monitored as part of BANA India Risk Appetite Metrics

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Table DF-9: Interest Rate Risk in the Banking Book (IRRBB)

I. Qualitative disclosures

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 banking book. In other words, IRRBB refers to 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

Presently the Bank uses the following tools for managing interest rate risk:

Gap analysis: The interest rate gap or mismatch risk is measured by calculating gaps over different time intervals at a given date. This static analysis measures mismatches between rate sensitive liabilities ("RSL") and rate sensitive assets ("RSA"). The report is prepared monthly by grouping rate sensitive liabilities, assets and off-balance sheet positions into time buckets according to residual maturity or next re-pricing period, whichever is earlier. The difference between RSA and RSL for each time bucket signifies the gap in that time bucket. The direction of the gap indicates whether net interest income is positively or negatively impacted by a change in interest rates and the magnitude of the gap helps in assessing the change in net interest income for any given interest rate shift. The interest rate sensitivity/gap reports are reviewed by the ALCO on a regular basis and is also monitored as part of the BANA India Risk Appetite Metrics

Earnings at risk ("EaR"): The interest rate gap reports mentioned above indicate whether the Bank is in a position to benefit from rising interest rates by having a positive gap ($RSA > RSL$) or whether it is in a position to benefit from declining interest rates by having a negative gap ($RSL > RSA$). EaR measures the change in NII over a one year time horizon for various levels of parallel shift in interest rates.

Economic value: Change in the interest rates have a long-term impact on the capital position of the Bank, as the economic value of the Bank's assets, liabilities and off-balance sheet positions get affected by these rate changes. The Bank applies a modified duration approach and monitors impact of various levels of parallel shift in interest rate curves on the capital position. The interest rate sensitivity/gap reports are reviewed by the ALCO on a regular basis.

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II. Quantitative disclosures

The increase / (decline) in earnings and economic value (on a pre-tax basis) for an upward/downward rate shock broken down by currency is as below

a. Impact on net interest income over the next 12 months (earnings perspective)

<i>INR Million</i>	31-Mar-24		31-Mar-23	
	If interest rate were to go up by 100 basis points	If interest rate were to go down by 100 basis points	If interest rate were to go up by 100 basis points	If interest rate were to go down by 100 basis points
Currency				
INR	(1,121)	1,121	(1,125)	1,125
USD	(456)	456	106	(106)
Others	9	(9)	15	(15)
Total	(1,568)	1,568	(1,004)	1,004

b. Impact on market value of equity (economic value perspective):

<i>INR Million</i>	31-Mar-24		31-Mar-23	
	If interest rate were to go up by 200 basis points	If interest rate were to go down by 200 basis points	If interest rate were to go up by 200 basis points	If interest rate were to go down by 200 basis points
Currency				
INR	6,593	(6,593)	6,535	(6,535)
USD	1,693	(1,693)	1,351	(1,351)
Others	17	(17)	103	(103)
Total	8,303	(8,303)	7,989	(7,989)

Note :

RBI has issued final guidelines on Interest Rate in Banking Book (IRRBB) in Feb 23 but the effective date for implementation is yet to be communicated , the bank will present results basis the new guidelines once the same is made effective.

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Table DF-10: General Disclosure for Exposures Related to Counterparty Credit Risk

I. Qualitative disclosures

Discussion of methodology used to assign economic capital and credit limits for counterparty credit exposures

A credit approval document is used to analyze the counterparty's creditworthiness, document transaction structure and risk mitigation, and approve the Traded Products limit(s). Specific requests, including limit structure and attributes is also included in the credit approval document. BANA India adopts standardized model which does not calculate economic capital for counterparty credit exposures.

Discussion of policies for securing collateral and establishing credit reserve

Collateralization is one of the key credit risk mitigation techniques available in the OTC Derivatives market. The term "Collateral" means cash or non-cash financial securities provided as security to mitigate loss arising from a counterparty default. Generally, when facing derivative counterparties, Bank of America (the "Bank") enters into master netting arrangements and, in appropriate circumstances, collateral arrangements which provide the Bank certain rights and obligations. The Bank monitors the fair market value of the underlying securities used as collateral, including accrued interest, and, as necessary, requests additional collateral to ensure the relevant transactions are adequately collateralized per agreed terms. BANA India makes appropriate provisions for credit risk as per regulatory guidelines.

Discussion of policies with respect to wrong-way risk exposures

Wrong Way Risk arises when a counterparty's credit quality is correlated to the underlying risk exposure in a transaction such that as the credit quality of the counterparty deteriorates, the Mark-to-Market ("MTM") owed by the counterparty has a tendency to increase. The Correlation and Concentration Risk Policy addresses the identification, measurement, and management of the Counterparty Credit Risk derived from correlation and concentration risk. It defines the limit types and approval requirements.

Discussion of the impact of the collateral the bank would have to provide given a credit rating downgrade

As per local contractual agreements, BANA India is not required to post any collateral given a credit rating downgrade.

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II. Quantitative disclosures

As at March 31, 2024

	Forward Exchange Contracts	Interest Rate Derivative Contracts	Cross Currency Swaps	Options	Total
<i>INR Million</i>					
Gross positive fair value of contracts	21,452	49,550	3,500	1,346	75,848
Netting benefits*					47,668
Netted current credit exposure (positive mark-to-market)					28,180
Collateral held					10,423
Net derivatives credit exposure					17,757
Gross potential future exposure	210,346	74,940	6,101	11,339	302,726
Netting benefits*					65,011
Net potential future exposure					237,715
Exposure at default under Current Exposure Method					255,472
<i>INR Million</i>					
Notional value of credit derivative hedges					
Institution's own credit portfolio					
• Protection bought					
• Protection sold					Not Applicable
Institution's Intermediation activity credit portfolio					
• Protection bought					
• Protection sold					

As at March 31, 2023

	Forward Exchange Contracts	Interest Rate Derivative Contracts	Cross Currency Swaps	Options	Total
<i>INR Million</i>					
Gross positive fair value of contracts	24,327	56,789	4,298	1,976	87,390
Netting benefits*					35,433
Netted current credit exposure (positive mark-to-market)					51,957
Collateral held					-
Net derivatives credit exposure					51,957
Gross potential future exposure	148,455	65,313	8,115	6,498	228,381
Netting benefits*					7,973
Net potential future exposure					220,408
Exposure at default under Current Exposure Method					272,365
<i>INR Million</i>					
Notional value of credit derivative hedges					
Institution's own credit portfolio					
• Protection bought					Not Applicable

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- Protection sold
- Institution's Intermediation activity credit portfolio
- Protection bought
 - Protection sold

*Note: Previous year figures have been regrouped and reclassified wherever necessary to confirm to current year's presentation.
* This represents netting benefits with respect to Qualified Central Clearing Counterparties and Bilateral Netting*

Table DF-11: Composition of Capital

Sr. no	Particulars	Amt in INR mm	Amounts Subject to Pre-Basel III Treatment	Reference No.
Common Equity Tier 1 capital: instruments and reserves				
1.	Directly issued qualifying common share capital plus related stock surplus (share premium) *	31,883		A1
2.	Retained earnings	115,556		A2+A3
3.	Accumulated other comprehensive income (and other reserves)	-		
4.	Directly issued capital subject to phase out from CET1 (only applicable to non-joint stock companies ¹)	-		
5.	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)	-		
6.	Common Equity Tier 1 capital before regulatory adjustments	147,439		
Common Equity Tier 1 capital: regulatory adjustments				
7.	Prudential valuation adjustments	-		
8.	Goodwill (net of related tax liability)	-		
9.	Intangibles (net of related tax liability)	80		C1
10.	Deferred tax assets	-	-	
11.	Cash-flow hedge reserve	-		
12.	Shortfall of provisions to expected losses	-		
13.	Securitisation gain on sale	-		
14.	Gains and losses due to changes in own credit risk on fair valued liabilities	-		
15.	Defined-benefit pension fund net assets	-		
16.	Investments in own shares (if not already netted off paid-in capital on reported balance sheet)	-		
17.	Reciprocal cross-holdings in common equity	-		
18.	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued share capital (amount above 10% threshold)	-		
19.	Significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions (amount above 10% threshold)	-		

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20.	Mortgage servicing rights (amount above 10% threshold)	-		
21.	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability)	-		
22.	Amount exceeding the 15% threshold	-		
23.	of which: significant investments in the common stock of financial entities	-		
24.	of which: mortgage servicing rights	-		
25.	of which: deferred tax assets arising from temporary differences	-		
26.	National specific regulatory adjustments (26a+26b+26c+26d)	-		
26a	of which: Investments in the equity capital of the unconsolidated insurance subsidiaries	-		
26b	of which: Investments in the equity capital of unconsolidated non-financial subsidiaries	-		
26c	of which: Shortfall in the equity capital of majority owned financial entities which have not been consolidated with the bank	-		
26d	of which: Unamortised pension funds expenditures	-		
27.	Regulatory adjustments applied to Common Equity Tier 1 due to insufficient Additional Tier 1 and Tier 2 to cover deductions	-		
28.	Total regulatory adjustments to Common equity Tier 1	80		
29.	Common Equity Tier 1 capital (CET1)	147,359		
30.	Directly issued qualifying Additional Tier 1 instruments plus related stock surplus (31+32)	-		
31.	of which: classified as equity under applicable accounting standards (Perpetual Non-Cumulative Preference Shares)	-		
32.	of which: classified as liabilities under applicable accounting standards (Perpetual debt Instruments)	-		
33.	Directly issued capital instruments subject to phase out from Additional Tier 1	-		
34.	Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group AT1)	-		
35.	of which: instruments issued by subsidiaries subject to phase out	-		
36.	Additional Tier 1 capital before regulatory adjustments	-		
Common Equity Tier 1 capital: instruments and reserves				
Additional Tier 1 capital: regulatory adjustments				
37.	Investments in own Additional Tier 1 instruments	-		
38.	Reciprocal cross-holdings in Additional Tier 1 instruments	-		
39.	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above 10% threshold)	-		
40.	Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)	-		
41.	National specific regulatory adjustments (41a+41b)	-		
41a	of which: Investments in the Additional Tier 1 capital of unconsolidated insurance subsidiaries	-		
41b	Of which: Shortfall in the Additional Tier 1 capital of majority owned financial entities which have not been consolidated with the bank	-		
42.	Regulatory adjustments applied to Additional Tier 1 due to insufficient Tier 2 to cover deductions	-		
43.	Total regulatory adjustments to Additional Tier 1 capital	-		
44.	Additional Tier 1 capital (AT1)	-		

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45.	Tier 1 capital (T1 = CET1 + AT1) (29 + 44)	147,359		
Tier 2 capital: instruments and provisions				
46.	Directly issued qualifying Tier 2 instruments plus related stock surplus	-		
47.	Directly issued capital instruments subject to phase out from Tier 2	-		
48.	Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier 2)	-		
49.	of which: instruments issued by subsidiaries subject to phase out	-		
50.	Provisions	14,976		B1+B2+B3+B4+B5
51.	Tier 2 capital before regulatory adjustments	14,976		
52.	Investments in own Tier 2 instruments	-		
53.	Reciprocal cross-holdings in Tier 2 instruments	-		
54.	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above the 10% threshold)	-		
55.	Significant investments in the capital banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)	-		
56.	National specific regulatory adjustments (56a+56b)	-		
56a	of which: Investments in the Tier 2 capital of unconsolidated subsidiaries	-		
56b	of which: Shortfall in the Tier 2 capital of majority owned financial entities which have not been consolidated with the bank	-		
57.	Total regulatory adjustments to Tier 2 capital	-		
58.	Tier 2 capital (T2)	14,976		
59.	Total capital (TC = T1 + T2) (45 + 58)	162,335		
60.	Total risk weighted assets (60a + 60b + 60c)	879,345		
60a	of which: total credit risk weighted assets	638,931		
60b	of which: total market risk weighted assets	177,264		
60c	of which: total operational risk weighted assets	63,150		
Capital ratios and buffers				
61.	Common Equity Tier 1 (as a percentage of risk weighted assets)	16.76%		
62.	Tier 1 (as a percentage of risk weighted assets)	16.76%		
63.	Total capital (as a percentage of risk weighted assets)	18.46%		
64.	Institution specific buffer requirement (minimum CET1 requirement plus capital conservation and countercyclical buffer requirements plus G-SIB buffer requirement, expressed as a percentage of risk weighted assets)	11.00%		
65.	of which: capital conservation buffer requirement	2.50%		
66.	of which: bank specific countercyclical buffer requirement	-		
67.	of which: G-SIB buffer requirement	3.00%		
68.	Common Equity Tier 1 available to meet buffers (as a percentage of risk weighted assets) – (Point 61 – Point 71)	7.76%		
National minima (if different from Basel III)				

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69.	National Common Equity Tier 1 minimum ratio (if different from Basel III minimum)	5.50%		
70.	National Tier 1 minimum ratio (if different from Basel III minimum)	7.00%		
71.	National total capital minimum ratio (if different from Basel III minimum)	9.00%		
Amounts below the thresholds for deduction (before risk weighting)				
72.	Non-significant investments in the capital of other financial entities	-		
73.	Significant investments in the common stock of financial entities	-		
74.	Mortgage servicing rights (net of related tax liability)	NA		
75.	Deferred tax assets arising from temporary differences (net of related tax liability)	-		
Applicable caps on the inclusion of provisions in Tier 2				
76.	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to standardised approach (prior to application of cap)	2,944		
77.	Cap on inclusion of provisions in Tier 2 under standardised approach	7,987		
78.	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to internal ratings-based approach (prior to application of cap)	-		
79.	Cap for inclusion of provisions in Tier 2 under internal ratings-based approach	-		
Capital instruments subject to phase-out arrangements (only applicable between March 31, 2017 and March 31, 2022)				
80.	Current cap on CET1 instruments subject to phase out arrangements	-		
81.	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-		
82.	Current cap on AT1 instruments subject to phase out arrangements	-		
83.	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-		
84.	Current cap on T2 instruments subject to phase out arrangements	-		
85.	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-		

*The capital reflected above excludes capital infused for CRM purposes.

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Table DF-12: Composition of Capital- Reconciliation Requirement

INR Million

		Balance sheet as in financial statements	Balance sheet under regulatory scope of consolidation
		As on 31-Mar-24	As on 31-Mar-24
A	Capital & Liabilities		
i	Paid-up Capital	52,326	52,326
	Reserves & Surplus	141,435	141,435
	Minority Interest	-	-
	Total Capital	193,761	193,761
Ii	Deposits	598,557	598,557
	of which: Deposits from banks	11,813	11,813
	of which: Customer deposits	586,744	586,744
	of which: Other deposits (pl. specify)	-	-
iii	Borrowings	162,808	162,808
	of which: From RBI	15,000	15,000
	of which: From banks	62,890	62,890
	of which: From other institutions & agencies	84,918	84,918
	of which: Others (pl. specify)	-	-
	of which: Capital instruments	-	-
iv	Other liabilities & provisions	112,714	112,714
	Total	1,067,840	1,067,840
B	Assets		
i	Cash and balances with Reserve Bank of India	39,637	39,637
	Balance with banks and money at call and short notice	43,399	43,399
ii	Investments:	601,596	601,596
	of which: Government securities	526,478	526,478
	of which: Shares	-	-
	of which: Debentures & Bonds	-	-
	of which: Subsidiaries / Joint Ventures / Associates	-	-
	of which: Others (US T bills, Certificate of Deposits etc.)	75,118	75,118
iii	Loans and advances	274,380	274,380
	of which: Loans and advances to banks	8,136	8,136
	of which: Loans and advances to customers	266,244	266,244
iv	Fixed assets	1,778	1,778
	of which: Goodwill and intangible assets	80	80
v	Other assets	107,050	107,050
	of which: Deferred tax assets	3,054	3,054
vi	Goodwill on consolidation	-	-
vii	Debit balance in Profit & Loss account	-	-
	Total Assets	1,067,840	1,067,840

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		Balance sheet as in	Balance sheet under	Referenc
		financial statements	regulatory scope of	
		As on 31-Mar-24	As on 31-Mar-24	e no.
<i>INR Million</i>				
A	Capital & Liabilities			
	Paid-up Capital	52,326	52,326	
	of which: Amount eligible for CET1	31,883	31,883	A1
	of which: Amount eligible for AT1	-	-	
	Reserves & Surplus	141,435	141,435	
	Statutory Reserves	36,223	36,223	A2
	Capital Reserves	79,333	79,333	A3
	Investment Reserve Account	6	6	B1
	Investment Fluctuation Reserve	12,033	12,033	B2
	Balance in Profit & Loss A/c	13,840	13,840	
	of which:			
	Unallocated Surplus	4,533	4,533	
	Current period profits not reckoned for Capital Adequacy	9,307	9,307	
	Minority Interest	-	-	
i	Total Capital	193,761	193,761	
ii	Deposits	598,557	598,557	
	of which: Deposits from banks	11,813	11,813	
	of which: Customer deposits	586,744	586,744	
	of which: Other deposits (pl. specify)	-	-	
iii	Borrowings	162,808	162,808	
	of which: From RBI	15,000	15,000	
	of which: From banks	62,890	62,890	
	of which: From other institutions & Agencies	84,918	84,918	
	of which: Others (pl. specify)	-	-	
	of which: Capital instruments	-	-	
iv	Other liabilities & provisions	112,714	112,714	
	of which: Provision for Standard Assets	2,880	2,880	B3
	of which: Provision for Country risk	58	58	B4
	of which: General Provision	-	-	B5
	of which: Provision for Enhancing Credit Supply	2,025	2,025	
	of which: DTLs related to goodwill	-	-	
	of which: DTLs related to intangible assets	-	-	
	Total Capital and Liabilities	1,067,840	1,067,840	
B	Assets			
i	Cash and balances with Reserve Bank of India	39,637	39,637	
ia	Balance with banks and money at call and short notice	43,399	43,399	
ii	Investments	601,596	601,596	
	of which: Government securities	526,478	526,478	
	of which: Other approved securities	-	-	
	of which: Shares	-	-	
	of which: Debentures & Bonds	-	-	
	of which: Subsidiaries / Joint Ventures / Associates	-	-	
	of which: Others (US T bills, Certificate of Deposits etc.)	75,118	75,118	
iii	Loans and advances	274,380	274,380	
	of which: Loans and advances to banks	8,136	8,136	
	of which: Loans and advances to customers	266,244	266,244	
iv	Fixed assets	1,778	1,778	
	Other intangibles (excluding MSRs)	80	80	C1
v	Other assets	107,050	107,050	

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	of which:	-	-	
	Goodwill	-	-	
	Deferred tax assets	3,054	3,054	
	Goodwill on consolidation	-	-	
	Debit balance in Profit & Loss account	-	-	
	Total Assets	1,067,840	1,067,840	

Table DF-13: Main Features of Regulatory Capital Instruments

The Bank has not issued any Regulatory Capital instruments

Disclosure template for main features of regulatory capital instruments		
1	Issuer	Not Applicable
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	
3	Governing law(s) of the instrument	
	<i>Regulatory treatment</i>	
4	Transitional Basel III rules	
5	Post-transitional Basel III rules	
6	Eligible at solo/group/ group & solo	
7	Instrument type	
8	Amount recognised in regulatory capital (Rs. in million, as of most recent reporting date)	
9	Par value of instrument	
10	Accounting classification	
11	Original date of issuance	
12	Perpetual or dated	
13	Original maturity date	
14	Issuer call subject to prior supervisory approval	
15	Optional call date, contingent call dates and redemption amount	
16	Subsequent call dates, if applicable	
	<i>Coupons / dividends</i>	
17	Fixed or floating dividend/coupon	
18	Coupon rate and any related index	
19	Existence of a dividend stopper	
20	Fully discretionary, partially discretionary or mandatory	
21	Existence of step up or other incentive to redeem	
22	Noncumulative or cumulative	
23	Convertible or non-convertible	
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	

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29	If convertible, specify issuer of instrument it converts into	
30	Write-down feature	
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	
34	If temporary write-down, description of write-up mechanism	
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	
36	Non-compliant transitioned features	
37	If yes, specify non-compliant features	

Table DF-14: Full Terms and Conditions of Regulatory Capital Instruments

Instruments	Full Terms and Conditions
The Bank has not issued any Regulatory Capital instruments	

Table DF-15: Disclosure Requirements for Remuneration

The Bank's compensation policies including that of CEO's, is in conformity with the Financial Stability Board principles and standards. In accordance with the requirements of the RBI Circular No. DBOD No.BC.72/29.67/001/2011-12 dated January 13, 2012; the Regional Office of the Bank has submitted a declaration to RBI confirming the aforesaid matter and hence this disclosure is not applicable.

Table DF-16: Equities – Disclosure for Banking Book Position - Nil

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Table DF-17: Summary Comparison of Accounting Assets vs Leverage Ratio Exposure Measure

	Item	INR Million
1	Total consolidated assets as per published financial statements	1,067,840
2	Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	-
3	Adjustment for fiduciary assets recognised on the balance sheet pursuant to the operative accounting framework but excluded from the leverage ratio exposure measure	-
4	Adjustments for derivative financial instruments	208,059
5	Adjustment for securities financing transactions (i.e. repos and similar secured lending)	-
6	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off- balance sheet exposures)	91,577
7	Other adjustments (Asset amounts deducted in determining Basel III Tier 1 capital)	(80)
8	Leverage ratio exposure	1,367,396

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Table DF-18: Leverage Ratio Common Disclosure Template

	Item	INR Million
	On-balance sheet exposures	
1	On-balance sheet items (excluding derivatives and SFTs, but including collateral)	949,430
2	(Asset amounts deducted in determining Basel III Tier 1 capital)	(80)
3	Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of lines 1 and 2)	949,350
	Derivative exposures	
4	Replacement cost associated with all derivatives transactions (i.e., net of eligible cash variation margin)	28,186
5	Add-on amounts for PFE associated with all derivatives transactions	255,727
6	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the operative accounting framework	-
7	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-
8	(Exempted CCP leg of client-cleared trade exposures)	-
9	Adjusted effective notional amount of written credit derivatives	-
10	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-
11	Total derivative exposures (sum of lines 4 to 10)	283,913
	Securities financing transaction exposures	
12	Gross SFT assets (with no recognition of netting), after adjusting for sale accounting transactions	42,556
13	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-
14	CCR exposure for SFT assets	-
15	Agent transaction exposures	-
16	Total securities financing transaction exposures (sum of lines 12 to 15)	42,556
	Other off-balance sheet exposures	
17	Off-balance sheet exposure at gross notional amount	408,556
18	(Adjustments for conversion to credit equivalent amounts)	(316,979)
19	Off-balance sheet items (sum of lines 17 and 18)	91,577
	Capital and total exposures	
20	Tier 1 capital*	147,359
21	Total exposures (sum of lines 3, 11, 16 and 19)	1,367,396
22	Basel III leverage ratio (per cent)	10.78%

Quantitative disclosures

INR Million	31-Mar-24	31-Dec-23	30-Sep-23	30-Jun-23
Tier 1 Capital	147,359	134,449	127,652	127,653
Exposure Measure	1,367,396	1,217,392	1,164,327	1,088,236
Leverage Ratio (%)	10.78	11.04	10.96	11.53
Minimum Regulatory Requirement (%)	3.50	3.50	3.50	3.50