#### **Basel III Pillar 3 Disclosures (31.03.2021)**

### **Table DF- 1: Scope of Application**

Name of the head of the banking group to which the framework applies:

The Nainital Bank Ltd.

#### (i) Qualitative Disclosures:

### a. List of group entities considered for consolidation

There is no such entity which may be considered under accounting scope of consolidation.

Name of the entity/ (Country of Incorporati on)	Whether the entity is included under accounting scope of consolidati on (Yes/No)	Explain the method of consolidati on	Whether the entity is included under regulatory scope of consolidati on (Yes/No)	Explain the method of consolida tion	Explain the reasons for difference in method of consolidati on	Explain the reasons if consolidated under only one of the scopes of consolidation
Nil						

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

There are no entities in the group which are considered for consolidation under both accounting and regulatory scope of consolidation.

### (ii) Quanitative Disclosures:

### c. List of group entities considered for consolidation

There is no such entity which may be considered for consolidation.

# 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

Bank does not have any subsidiary as such there is no scope of capital deficiency in any of subsidiary.

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

The bank has no interest in insurance entity.

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

There is no restriction.

### **Table DF-2: Capital Adequacy**

### (i) Qualitative Disclosures

**a.** The Bank has put in place a robust Risk Management Architecture with due focus on Capital optimization and on profit maximization, i.e. to do maximum business out of the available capital which in turn maximize profit or return on equity. Bank is benchmarking on globally accepted sound risk management system, conforming to Basel III framework, enabling a more efficient equitable and prudent allocation of resources.

In Capital Planning process the bank reviews:

- Current capital requirement of the Bank
- The targeted and sustainable capital in terms of business strategy and risk appetite.

Capital needs are monitored periodically by the Internal Risk Management Committee comprising Top Executives. Capital requirement is projected annually considering the expected growth in advances, investments, Deposits, NPA, Operating Profit etc.

Bank maintains capital to cushion the risk of loss in value of exposure, businesses etc. so as to protect the depositors and general creditors against losses. Bank has a well defined Internal Capital Adequacy Assessment Policy (ICAAP) to comprehensively evaluate and document all risks.

In line with the guidelines of the Reserve Bank of India, the Bank has adopted Standardised Approach for Credit Risk, Basic Indicator Approach for Operational Risk and Standardized Duration Approach for Market Risk for computing CRAR.

The capital requirement is affected by the economic environment, the regulatory requirement and by the risk arising from bank's activities. The purpose of capital planning of the bank is to ensure the adequacy of capital at the times of changing economic conditions, even at times of economic recession. In capital planning process the bank reviews:

- Current capital requirement of the bank.
- The targeted and sustainable capital in terms of business strategy and risk appetite.
- The future capital planning is done on a three-year outlook.

### (ii) Quantitative Disclosures

S. No.	Items	Amount (Rs. in Crores) 31.03.2021
(b)	Capital requirements for Credit Risk	
	Portfolios subject to Standardized Approach	380.65
	Securitization Exposures	
(c)	Capital requirements for Market Risk	
	Standardized Duration Approach	44.23
	Interest Rate Risk	44.23
	<ul> <li>Foreign Exchange Risk (including Gold)</li> </ul>	
	Equity Risk	0.00
(d)	Capital requirements for Operational Risk	
	Basic Indicator Approach	51.06
(e)	Common Equity Tier 1, tier 1 and Total Capital ratios:	
	Group CRAR	
	CET 1 Ratio	
	Tier 1 Ratio	
	Tier 2 Ratio	
	• CRAR	
	Stand alone CRAR	
	CET 1 Ratio	12.88%
	Tier 1 Ratio	12.88%
	Tier 2 Ratio	0.79%
	• CRAR	13.67%

### Table DF-3: Credit Risk (i) Qualitative Disclosures

**a.** The policy of the bank for classifying bank's loan assets is as under:

NON PERFORMING ASSETS (NPA): A non performing asset (NPA) is a loan or an advance where;

- interest and/ or installment of principal remain overdue for a period of more than 90 days in respect of a term loan,
- the account remains 'out of order' in respect of an Overdraft/Cash Credit (OD/CC),
- the bill remains overdue for a period of more than 90 days in the case of bills purchased and discounted.
- the installment of principal or interest thereon remains overdue for two crop seasons for short duration crops,
- the installment of principal or interest thereon remains overdue for one crop season for long duration crops.

An OD/CC account is treated as 'out of order' if the outstanding balance remains continuously in excess of the sanctioned limit/drawing power. In cases where the outstanding balance in the principal operating account is less than the sanctioned limit/drawing power, but there are no credits continuously for 90 days as on the date of Balance Sheet or credits are not enough to cover the interest debited during the same period, these accounts are treated as 'out of order'.

An amount due to the bank under any credit facility is 'overdue' if it is not paid on the due date fixed by the bank.

Non Performing Assets of the Bank are further classified in to three categories as under:

#### **Sub standard Assets**

A sub standard asset would be one, which has remained NPA for a period less than or equal to 12 months. All the recovery measures are relevant in substandard assets also. If the entire overdues are recovered by way of cash recovery, the account can be upgraded to standard category immediately. Similarly, if an account is classified as NPA due to technical reasons, the account shall be upgraded on clearance of technical reasons.

### **Doubtful Assets**

An asset would be classified as doubtful if it remained in the sub standard category for 12 months. Substandard and Doubtful accounts which are subjected to restructuring/rescheduling, can be upgraded to standard category only after a period of one year after the date when first payment of interest or of principal, whichever is earlier, falls due, subject to satisfactory performance during the period.

### **Loss Assets**

A loss asset is one where loss has been identified by the bank or internal or external auditors or the RBI inspection. In Loss assets, realizable value of security available is not more than 10% of balance outstanding/ dues. Since security back up will not be available, the restructuring/ rehabilitation, if required, is considered with utmost care.

### **Strategies and Processes:**

The bank has a well defined Loan Policy, Credit Risk Policy & Investment Policy covering the important areas of credit risk management as under:

- Exposure ceilings to different sectors of the economy, different types of borrowers and their group and industry
- Fair Practice Code in dispensation of credit.
- Discretionary Lending Powers for different levels of authority of the bank.
- Processes involved in dispensation of credit pre sanction inspection, rejection, appraisal, sanction, documentation, monitoring, and recovery.
- Fixation of pricing.

### The Credit Risk philosophy, architecture and systems of the bank are as under:

Credit Risk Philosophy:

- To Optimise the Credit and return envisaged in order that the Economic Value Addition to Shareholders is maximized and the interests of all the Stakeholders are protected alongside ensuring corporate growth and prosperity with safety of bank's resources.
- To regulate and streamline the financial resources of the bank in an orderly manner to enable the various channels to incline and achieve the common goal and objectives of the Bank.
- To comply with the national priorities in the matter of deployment of institutional finance to facilitate achieving planned growth in various productive sectors of the economy.
- To instill a sense of credit culture enterprise-wide and to assist the operating staff.
- To provide need-based and timely availability of credit to various borrower segments.
- To strengthen the credit management skills namely pre-sanction, postsanction monitoring, supervision and follow-up measures so as to promote a healthy credit culture and maintain quality credit portfolio in the bank.
- To deal with credit proposals more effectively with quality assessment, speed and in full compliance with extant guidelines.
- To comply with various regulatory requirements, more particularly on Exposure norms, Priority Sector norms, Income Recognition and Asset Classification guidelines, Capital Adequacy, Credit Risk Management guidelines etc. of RBI/other Authorities.

#### **Architecture and Systems of the Bank:**

- A Sub-Committee of Directors has been constituted by the Board to specifically oversee and co-ordinate Risk Management functions in the bank.
- Credit Policy Committee has been set up to formulate and implement various credit risk strategy including lending policies and to monitor Bank's Risk Management function on a regular basis.
- The CRMC (Credit Risk Management Committee) is responsible for measuring, controlling and managing the credit risk within the prescribed limits and to ensure compliance to functioning within the prudential limits set by the Board.

- Formulating of policies on standards for credit proposals, financial covenants, rating standards and benchmarks.
- Credit Department deal with identification, measurement, monitoring and controlling credit risk within the prescribed limits.
- Credit Risk Management department does the portfolio analysis on quarterly basis as per the defined methods under credit risk policy.
- Enforcement and compliance of the risk parameters and prudential limits set by the Board/regulator etc.,
- Laying down risk assessment systems, developing MIS, and monitoring quality of loan portfolio, identification of problems, correction of deficiencies.
- Improving credit delivery system upon full compliance of laid down norms and guidelines.

### The Scope and Nature of Risk Reporting and/or Measurement System:

The Bank has in place a robust credit risk rating system for its credit exposures. An effective way to mitigate credit risks is to identify potential risks in a particular asset, maintain a healthy asset quality and at the same time impart flexibility in pricing assets to meet the required risk-return parameters as per the bank's overall strategy and credit policy. However Bank has a separate Credit Risk Policy where portfolio credit risk is analysed on quarterly interval on the basis defined methods.

### (ii) Quantitative Disclosures

### (b) Total Gross Credit Risk Exposure:

	Amount (Rs. in Crores)
Particulars	31.03.2021
Fund Based Outstanding	4028.59
Non-fund Based Outstanding	130.96
Total Gross Credit	4159.55

	Amount (Rs. in Crores)
Particulars	31.03.2021
Fund Based Exposure	4598.17
Non-fund Based Exposure	108.31
Total Gross Credit Exposure	4706.48

### (c) Geographic Distribution of Exposures:

Exposures	Amount (Rs. in Crores)			
	Fund Based Outstanding	Non-fund Based Outstanding		
Domestic operations	4028.59	130.96		
Overseas operations				
Total	4028.59	130.96		

### (d) Industry Type Distribution of Exposures

(Rs. in Crores)

S.No.	Industry	Fund Based	Non Fund	Total
<b>D.110.</b>	industry	(O/s)	Based	10001
		(0/5)	(O/S)	
A	Minning and Quarrying	46.65	0.21	46.85
A.1	Coal	0.00	0.00	0.00
A.2	Other	46.65	0.21	46.85
В	Food Processing	58.69	0.51	59.20
B.1	Sugar	0.00	0.11	0.11
B.2	Edible Oils and Vanaspati	26.25	0.00	26.25
B.3	Tea	0.52	0.00	0.52
B.4	Coffee	0.00	0.00	0.00
B.5	Others	31.92	0.40	32.32
C	Beverages	0.00	0.00	0.00
C.1	Tobacco and Tobacco Products	0.00	0.00	0.00
C.2	Others	0.00	0.00	0.00
D	Textiles	93.11	3.34	96.45
D.1	Cotton Textile	4.15	0.00	4.15
D.2	Jute Textile	0.00	0.00	0.00
D.3	Handicraft/Khadi	74.88	3.07	77.94
D.4	Silk	0.00	0.00	0.00
D.5	Woollen	0.00	0.00	0.00
D.6	Others	14.08	0.27	14.36
	Out of D to Spinning Mills	0.00	0.00	0.00
E	Leather and Leather Products	3.84	0.14	3.97
F	Wood and Wood Products	5.23	0.00	5.23
G	Paper and Paper Products	15.52	0.06	15.58
H	Petroleum	0.07	0.00	0.07
Ι	Chemicals and Chemical			
	Products	12.72	0.10	12.81
I.1	Fertilizers	0.89	0.00	0.89
I.2	Drugs and Pharmaceuticals	3.95	0.00	3.95
I.3	Petro-Chemicals	0.00	0.00	0.00
I.4	Other	7.88	0.10	7.97
J	Rubber Plastic and their	42.25		
	Products	10.88	0.00	10.88
K	Glass and Glassware	4.88	0.00	4.88
L	Cement and Cement Products	4.80	0.00	4.80
M	Basic Metal and Metal	22.47	0.74	24.24
N/ 1	Products	33.47	0.54	34.01
M.1	Iron and Steel	25.95	0.45	26.40
M.2	Other Metal and Metal Products	7.51	0.09	7.60
N	All Engineering	114.12	0.86	114.98
N.1	Electronics Other Enga	0.33	0.00	0.33
N.2	Other Engg	113.80	0.86	114.65

О	Vehicle, vehicle parts and	11.68	0.01	11.00
P	Transport Equipments	0.19	0.01	11.68 0.19
	Gems and Jewellery Construction	12.57	9.21	21.78
Q R	Infrastructure	129.17	22.71	151.88
R.1		19.52	0.73	20.25
	Transport			
R.1.1	Railways	0.00	0.00	0.00
R.1.2	Roadways	19.52	0.73	20.25
R.1.3	Aviation	0.00	0.00	0.00
R.1.4	Waterways	0.00	0.00	0.00
R.1.5	Others Transport	0.00	0.00	0.00
R.2	Energy	11.84	0.00	11.84
R.2.1	Electricity gen-trans-distribution	11.84	0.00	11.84
R.2.1.1	Of which state electricity board	11.84	0.00	11.84
R.2.2	Oil	0.00	0.00	0.00
R.2.3	Gas/LNG(Storage and Pipeline)	0.00	0.00	0.00
R.2.4	Other	0.00	0.00	0.00
R.3	Telecommunication	0.00	0.00	0.00
R.4	Others	0.00	0.00	0.00
R.4.1	Water Sanitation	0.00	0.00	0.00
R.4.2	Social and Commercial			
	Infrastructure	91.14	3.59	94.73
R.4.3	Others	6.67	18.39	25.06
S	Other Industries	45.35	0.00	45.35
	ALL INDUSTRIES(Total)	602.94	37.66	640.60
	Residuary other advances	3,425.65	93.30	3,518.95
	Total Loan & Advances	4028.59	130.96	4159.55

Credit Exposure of industries where outstanding exposure is more than 5% of the Total Gross Credit Exposure of the Bank is as follows:

S.No.	Industry	Total Exposure/ (O/s bal.) (in Crores)	% of Total Gross Credit Exposure
	NIL		

### (e) Residual maturity breakdown of assets

(Rs. in Crores)

	(RS. III Crore				iii Ciores)	> <i>)</i>	
	Cash & Balances with RBI	Balances with other Banks & Money at call & short notice	Investm ents	Advances	Fixed Assets	Other Assets	Total
1Day	81.52	153.09	0.00	23.13	0.00	156.00	413.74
2-7Days	8.84	265.00	0.00	98.13	0.00	0.52	372.49
8-14Days	8.02	0.00	19.13	117.86	0.00	0.78	145.79
15-30Days	6.33	5.97	0.00	227.36	0.00	1.31	240.97
31days – upto2Months	13.53	53.00	44.67	109.41	0.00	12.99	233.60
Over 2months upto 3Months	13.73	105.00	16.62	112.05	0.00	12.99	260.39
Over 3 upto 6 Months	44.57	485.08	148.00	57.28	0.00	56.62	791.55
Over 6 upto 12 Months	51.52	509.97	156.76	128.23	0.00	1.71	848.19
Over 1 year upto 3 Years	109.60	2.05	360.89	1649.34	0.00	0.84	2122.72
Over 3 upto 5 Years	3.23	0.00	547.93	415.77	0.00	8.82	975.75
Over 5 Years	0.69	0.00	1025.01	709.14	32.84	9.41	1777.09
TOTAL	341.58	1579.16	2319.01	3647.70	32.84	261.99	8182.28

S.No.	Asset Category	Amount (Rs. in Crores)
f)	NPAs (Gross)*:	650.67
	Substandard	166.09
	Doubtful 1	96.12
	Doubtful 2	227.76
	Doubtful 3	61.98
	Loss	98.72
g)	Net NPAs	206.93
h)	NPA Ratios	
	Gross NPAs to gross advances (%)	16.15%
	Net NPAs to net advances (%)	5.77%
i)	Movement of NPA(Gross)	
	Opening balance	536.03
	Additions	176.94
	Reductions	62.30
	Closing balance	650.67
j)	SPECIFIC PROVISION	
	Movement of provisions for NPAs	
	Opening balance	274.69
	Provisions made during the period	85.01

Write offs/ Write provisions	back of excess	1.10
Any other adju	stments, including	
transfers between pr	ovisions	250.60
Closing balance	CON	358.60
GENERAL PROVISI		
j) Movement of provi	SIONS FOR NPAS	62.85
Opening balance	ng the newind	62.85
Provisions made duri	ng the period	0.00
Write back of excess	nnoviciona	0.00
Write back of excess		0.00
Any other adju transfers between pr	stments, including ovisions	0.00
Closing balance		62.85
Write-offs that have been b	ooked directly to the	0.00
income statement	·	
Recoveries that have been be	pooked directly to the	0.04
income statement	-	
2	Non-Performing	0.00
Investments	ione hold for non	0.00
I) Amount of provis performing investr	ions held for non-	0.00
m) Movement of	provisions for	3.08
depreciation on inv	-	3.00
Opening balance	restillents	0.00
Provisions made duri	ng the period	3.08
Write-off	ing the period	0.00
Write back of excess	provisions	0.00
Closing balance	p. 6 (16)(6)(6)	3.08
n) By major industry	or counter type	2.03
n, zy majer madetry	Amount of NPAs	Provision
Top 5 Industries	245.86	175.69
	Gross NPA	Provision
o) Geographic-wise	GIUSS NPA	FI UVISIUII
breakun		
<b>breakup</b> Domestic	650.67	358.60

Table DF-4: Credit Risk Disclosures for portfolios subject to Standardised Approach

### (i) Qualitative Disclosures

### (a) For portfolios under the Standardised Approach:

The Bank has recognized following credit rating agencies for the purpose of rating of an exposure & assigning risk weights for computation of capital charge under standardized approach.

### Domestic credit rating agencies:

- Credit Analysis & Research Limited (CARE),
- CRISIL Limited,
- ICRA Limited,
- India Ratings (Formerly FITCH India)
- Brickwork

#### SMERA

### Types of exposure for which each agency is used:

All the above agencies are recognized for rating all types of exposures.

# A description of the process used to transfer public issue ratings onto comparable assets in the banking books:

- Bank has used short term ratings for assets with maturity up to one year and long term ratings for assets maturing after one year as accorded by the approved external credit rating agencies.
- Bank has not used one rating of a CRA (Credit Rating Agency) for one exposure and another CRA's rating for another exposure on the same counterparty unless only one rating is available for given exposure.
- Amount above Rs. 50 Crores are subject to external rating.
- Bank has used only solicited rating from the recognized CRAs.

### (ii) Quantitative Disclosures

# (b) Amount of the Bank's Exposures- Gross Advances (Rated & Unrated) in Major Risk Buckets -under Standardized Approach, after factoring Risk Mitigants (i.e. Collaterals):

The amount of exposure including non-fund based after risk mitigation subject to Standardized Approach (rated and unrated) in the following three major risk buckets are as under:

S.No.	Particulars	Outstanding Amount(Rs. in Crores)			
		Fund Based	Non -Fund Based		
		31.03.2021	31.03.2021		
1	Below 100 % risk weight	2341.68	0.00		
2	100 % risk weight	849.41	98.71		
3	More than 100 % risk weight	277.01	0.00		
4	CRM Deducted	560.49	32.25		
5	Total Exposure	4028.59	130.96		
S.No.	Particulars	Exposure Amou	ınt(Rs. in Crores)		
		Fund Based	Non -Fund Based		
		31.03.2021	31.03.2021		
1	Below 100 % risk weight	3002.53	0.00		
2	100 % risk weight	794.38	76.06		
3	More than 100 % risk weight	240.77	0.00		
4	CRM Deducted	560.49	32.25		
5	Total Exposure	4598.17	108.31		

# Table Df-5: Credit Risk Mitigation: Disclosures for Standardized Approaches

### (i) Qualitative Disclosures

**Policies and processes for collateral valuation and management**: The Bank is having a Board approved collateral management policy which lays down the process, objectives, accepted types of collaterals and the framework including suitable management information system for effective collateral management, The Collaterals and guarantees properly taken and managed that would serve to:

- mitigate the risk by providing secondary source of repayment in the event of borrower's default on a credit facility due to inadequacy in expected cash flow or not;
- gain control on the source of repayment in the event of default;
- provide early warning of a borrower's deteriorating repayment ability; and
- Optimize risk weighted assets and to address Residual Risks adequately.

Bank uses a number of techniques to mitigate the credit risks to which it is exposed. Collateral Management process and practices of the Bank cover the entire activities comprising security and protection of collateral value, validity of collaterals and guarantees, and valuation /periodical inspection.

**Valuation**: Assets obtained to secure the loans granted by the Bank are subjected to valuation by valuers empanelled by the Bank. Monetary limits of the accounts, asset classification of the borrower, which is to be subjected to valuation, periodicity of valuation, are prescribed in the Banks' policy guidelines. Bank reviews the guidelines on valuation periodically.

### Description of the main types of collateral taken by the Bank:

The collateral commonly used by the Bank as risk mitigants comprises of

- 1. Moveable assets like stocks, moveable machinery etc.
- 2. Immoveable assets like land, building, plant & machinery.
- 3. Bank's own deposits
- 4. NSCs, IVPs, KVPs, Govt. Bonds, RBI Bonds, LIC policies, etc.
- 5. Cash Margin against Non-fund based facilities
- 6. Gold Jewellery
- 7. Shares as per approved list

The bank has well-laid out policy on valuation of securities charged to the bank. The Bank has applied securities mentioned at sr.no.3 to 6 above as Credit Risk Mitigants.

### Main types of Guarantor counterparty and their creditworthiness:

The main types of guarantors against the credit risk of the bank are:

- Individuals (Personal guarantees)
- Corporate
- Central Government
- State Government
- CGTMSE

CRM collaterals are mostly available in Loans Against Bank's Own Deposit and Loans against Government Securities, LIC Policies/ Shares.

CRM securities are also taken in non fund based facilities like Guarantees and Letters of Credit.

## Credit Risk Mitigation recognized by the Bank for the purpose of reducing capital requirement under New Capital Adequacy Framework

The Bank has recognized Cash, Bank's own Deposits, Gold & Gold Jewellery, LIC Policies with a declared surrender value, securities issued by Central and State Govts. as Credit Risk Mitigations for the purpose of reducing capital requirement under the New Capital Adequacy Framework.

### (ii) Quantitative Disclosures

S.No.	PARTICULARS	AMOUNT (Rs. in Crores) 31.03.2021
(b)	The total exposure (after, where applicable, on- or off balance sheet netting) that is covered by eligible financial collateral after the application of haircuts for each separately disclosed credit risk portfolio.	592.80
(c)	The total exposure (after, where applicable, on- or off balance sheet netting) that is covered by guarantees/credit derivatives (whenever specifically permitted by RBI) for each separately disclosed portfolio	

# Table DF-6: Securitization Exposures: Disclosures for Standardized Approach

### (i) Qualitative disclosures

The policy guidelines do not undertake any securitization exposures.

### (ii) Quantitative Disclosures

#### **BANKING BOOK**

S.No.	Particulars	31.03.2021
	NIL	

### **TRADING BOOK**

S.No.	Particulars	31.03.2021		
NIL				

The bank does not have any case of its assets securitised as on 31.03.2021.

### Table DF-7: Market Risk in Trading Book

### (i) Qualitative Disclosures

The Bank defines market risk as potential loss that the Bank may incur due to adverse developments in market prices.

Bank has put in place a proper system for calculating capital charge on Market Risk on Trading Portfolio as per RBI Guidelines, viz., Standardised Duration Approach. The capital charge thus calculated is converted into Risk Weighted Assets. The aggregated Risk Weighted Assets for credit risk, market risk and operational risk are taken in to consideration for arriving at the CRAR.

The structure and organization of the relevant risk management function: The Market Risk Management Structure in the Bank is as under:

- Board of Directors
- Risk Management Committee of the Board (RMC)
- ALCO Committee
- Internal Risk Management Committee
- Investment Committee
- Investment and Risk Department

#### (ii) Quantitative Disclosures

S.No.	Particulars	Amount of capital requirement (Rs. in Crores)
		31.03.2021
(a)	Interest Rate Risk	44.23
(b)	Equity Position Risk	
(c)	Foreign Exchange Risk	

#### **Table DF-8: Operational Risk**

### (i) Qualitative Disclosures

### Strategies and processes

The Operational Risk Management process of the Bank is driven by a strong organizational culture and sound operating procedures, involving corporate values, attitudes, competencies, internal control culture, effective internal reporting and contingency planning. Policies are put in place for effective management of Operational Risk in the Bank.

#### The structure and organization of the relevant risk management function

The Operational Risk Management Structure in the Bank is as under:

- Board of Directors
- Risk Management Committee of Board

- ALCO Committee
- Risk Managers
- Support Group for Operational Risk Management

### The scope and nature of risk reporting and/or measurement systems

The Risk reporting consists of operational risk loss incidents/events occurred in branches/offices relating to people, process, technology and external events.

# Policies for hedging and/or mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges/mitigants

Bank has put in place policies for management of Operational Risk management. The policy framework contains various aspects of Operational risk management such as identification, management, monitoring & mitigation of Operational risk areas.

In order to address risks involved in Outsourcing of activities, bank has put in place policies for management of Outsourcing Risk.

### **Operational Risk capital assessment**

The Bank has adopted Basic Indicator Approach for calculating capital charge for Operational Risk.

### (ii) Quantitative Disclosures

Capital charge for operational Risk as on 31.03.2021 was Rs.51.06 Cr. and Risk Weighted Assets for Operational Risk as on 31.03.2021 was Rs.469.52 Cr.

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

### (i) Qualitative Disclosures

### Interest Rate Risk in Banking Book (IRRBB)

Interest rate risk is the risk where changes in market interest rates affect a bank's financial position. As the bank holds rate sensitive on and off balance-sheets items of different maturity/repricing, currencies, markets and benchmark rates, and any adverse movement in these parameters exposes bank to interest rate risk. Interest Rate Risk in Banking Book (IRRBB) reveals the impact on bank's earnings (short-term impact) and net worth (long-term impact) due to adverse movement of interest rates and is measured on a monthly basis.

### **Organizational Framework**

Asset Liability Management Committee (ALCO) of the Bank is responsible for developing, implementing and managing interest rate risk management strategy as per the risk tolerance established by the Board of Directors/Risk Management Committee.

### **Strategies and Processes**

The Bank strives to match the price of its assets and liabilities coupled with proper maturity matching in-order to reduce the gap in different time buckets which are maturing or getting repriced. For measurement and management of interest rate risk, Bank adopts both the Traditional Gap Analysis (TGA) and the Duration Gap Analysis (DGA) to its domestic position of assets, liabilities and off-balance sheet items, which are rate sensitive.

The interest rate risk arises on account of re-pricing, yield curve change, basis risk. The Bank aims at capturing these risks arising from the maturity and re-pricing mismatches both from earnings perspective and economic value perspective using techniques viz.,

1. Gap Analysis: The basic tool for measuring interest rate risk is preparation of Interest Rate Sensitivity Statement (IRS) by grouping various items of Rate Sensitive Assets (RSA) and Rate Sensitive Liabilities (RSL) and off balance-sheet items into different time buckets according to the residual maturity or next repricing, whichever is earlier and arriving at the net gap (i.e., RSA - RSL).

A positive or asset sensitive Gap means that an increase in market interest rates result in an increase in NII. Conversely, a negative or liability sensitive Gap implies that the Bank's NII could decline as a result of increase in market interest rates.

- 2. Earnings at Risk (EaR): Earnings at Risk (EaR) indicates whether the bank is in a position to benefit by the rise in interest rate by having positive gap or benefits by fall in interest rate by having a negative gap. The impact of repricing risk on the earnings due to the parallel shift in interest rate is assessed for different rate shocks. Impact on the earnings is also estimated for yield curve change and basis risk.
- 3. Market Value of Equity (MVE): A long-term impact of changing interest rates is on bank's Market Value of Equity (MVE) or Net-worth as the economic value of bank's assets, liabilities and off balance sheet positions get affected due to variation in market interest rates. The estimated drop in the Market Value of Equity (MVE) as a result of prescribed rate shock is estimated by the Duration Gap Analysis (DGA) arising from changes in the value of interest rate sensitive positions across the whole Bank.

#### (ii) Quantitative Disclosures

### **Earning at Risk (Traditional Gap Analysis) (Short Term):**

The immediate impact of the changes in the interest rates on net interest income of the bank is analyzed under this approach. The Earning at Risk is analyzed under different scenarios for domestic operations as under:

- Yield curve risk: A parallel shift of 1% is assumed for assets as well as liabilities.
- Bucket wise different yield changes are assumed for the assets and the same are applied to the liabilities as well.

(Rs. in Crores)

	-100 bps	100 bps
Earning at Risk	-0.46	0.46

### **Economic Value of Equity (Duration Gap Analysis) (Long term)**

• Economic Value of Equity is done by calculating modified duration of assets and the liabilities to arrive at the modified duration of equity. Impact on the Economic Value of Equity is analyzed for a 200 bps rate shock at monthly intervals for domestic operations through Duration Gap Method.

	-200 bps	200 bps
Change in Economic Value of Equity	14.77%	(-)14.77%

### Table DF-10: General Disclosures for exposures related to Counterparty Credit Risk

### (i) Qualitative Disclosures

Counterparty Credit Risk is defined as the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows and is the primary source of risk for derivatives and securities financing transactions. Unlike a Bank's exposure to credit risk through a loan, where the exposure to credit risk is unilateral and only the lending bank faces the risk of loss, the counterparty credit risk is bilateral in nature i.e. the market value of the transaction can be positive or negative to either counterparty to the transaction and varying over time with the movement of underlying market factors.

An economic loss would occur if the transactions or portfolio of transactions with the counterparty has a positive economic value at the time of default.

Banks ensures all the due diligence are to be adhered to viz. KYC norms, satisfactory dealing, credit worthiness of the party before extending any derivative products to the party.

### (ii) Quantitative Disclosures

Amount(Rs.in Crores)					
S.No.	No. Particulars		Notional Amount	Current Exposure	
				31.03.2021	31.03.2021
1	Foreign	Exchange	Contracts		
2	Cross rate Sw	Currency	Interest		
3		Currency	Interest		
4	Total				

### **Table DF-11: Composition of Capital**

### Part I: Template to be used only from March 31, 2021

(Rs. in Million)

Basel III common disclosure template to be used from March 31, 2017					
Co	Common Equity Tier 1 capital: instruments and reserves				
1	Directly issued qualifying common share capital plus related	1550.00	a=a1+		
	stock surplus (share premium)		a2		
2	Retained earnings				
3	Accumulated other comprehensive income (and other reserves)	4088.96			
4	Directly issued capital subject to phase out from CET1 (only				
	applicable to non-joint stock companies)				
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	5638.96			
	adjustments				
	Common Equity Tier 1 capital: regulatory adjustmen	ts			
7	Prudential valuation adjustments				
8	Goodwill (net of related tax liability)				
9	Intangibles (net of related tax liability)				
10	Deferred tax assets				
11	Cash-flow hedge reserve				
12					
13					
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					
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)				
20	Mortgage servicing rights (amount above 10% threshold)				
21	Deferred tax assets arising from temporary differences				
L	(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				
L	financial entities				
24	of which: mortgage servicing rights				
25	of which: deferred tax assets arising from temporary				
L	differences				
26	National specific regulatory adjustments				
l	(26a+26b+26c+26d)				
26					
L	unconsolidated insurance subsidiaries				
261	of which: Investments in the equity capital of unconsolidated				

	non-financial subsidiaries		
260	of which: Shortfall in the equity capital of majority owned		
∠00	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		
29	Common Equity Tier 1 capital (CET1)	5638.96	
	Additional Tier 1 capital: instruments		
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		
	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		
10	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		
41h	Of which: Shortfall in the Additional Tier 1 capital of majority		
.12	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)	0.00	
45	Tier 1 capital (T1 = CET1 + AT1) (29 + 44)	5638.96	
	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	344.70	
51	Tier 2 capital before regulatory adjustments	344.70	
	Tier 2 capital: regulatory adjustments		
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	1 ,		
	financial entities which have not been consolidated with the		
E 7	Total regulatory adjustments to Tier 2 capital		
57		344.70	
58 59	Tier 2 capital (T2)	5983.66	
60	Total capital (TC = T1 + T2) (45 + 58)	43764.10	
	Total risk weighted assets (60a + 60b + 60c)		
	of which: total credit risk weighted assets	35002.22 4066.70	
	of which: total market risk weighted assets of which: total operational risk weighted assets	4695.18	
OUC	·	4093.10	
61	Capital ratios  Common Equity Tier 1 (as a percentage of risk weighted	12.88%	
01	assets)	12.0070	
62	Tier 1 (as a percentage of risk weighted assets)	12.88%	
63	Total capital (as a percentage of risk weighted assets)	13.67%	
64	Institution specific buffer requirement (minimum CET1	7.375%	
0-7	requirement plus capital conservation and countercyclical	7.57570	
	buffer requirements, expressed as a percentage of risk		
	weighted assets)		
65	of which: capital conservation buffer requirement	1.875%	
66	of which: bank specific countercyclical buffer requirement		
67	of which: G-SIB buffer requirement		
68	Common Equity Tier 1 available to meet buffers (as a		
	percentage of risk weighted assets)		
	National minima (if different from Basel III)		
69	National Common Equity Tier 1 minimum ratio (if different	5.50%	
70	from Basel III minimum)	0.000/	
70	National Tier 1 minimum ratio (if different from Basel III minimum)	8.00%	
71	National total capital minimum ratio (if different from Basel	9.00%	
, 1	III minimum)	5.00 /0	
	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)	
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 standardized approach (prior to application of cap)	344.70
77	Cap on inclusion of provisions in Tier 2 under standardized approach	
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	
Ca	pital instruments subject to phase-out arrangements (onloop between March 31, 2017 and March 31, 2022)	y applicable
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)	

### **Notes to the Templates**

Row No. of the	Particular	(Rs. in Million)
template		
10	Deferred tax assets associated with accumulated losses	
	Deferred tax assets (excluding those associated with accumulated losses) net of Deferred tax liability	
	Total as indicated in row 10	
19	If investments in insurance subsidiaries are not deducted fully from capital and instead considered under 10% threshold for deduction, the resultant increase in the capital of bank	
	of which: Increase in Common Equity Tier 1 capital	
	of which: Increase in Additional Tier 1 capital	
	of which: Increase in Tier 2 capital	
26b	If investments in the equity capital of unconsolidated non- financial subsidiaries are not deducted and hence, risk weighted then:	
	(i) Increase in Common Equity Tier 1 capital	
	(ii) Increase in risk weighted assets	
50	Eligible Provisions included in Tier 2 capital	344.70
	Eligible Revaluation Reserves included in Tier 2 capital	
	Total of row 50	344.70

**Table DF-12: Composition of Capital- Reconciliation Requirements** 

Step 1 (Rs. in Million)

		Balance sheet as in	Balance sheet under
		financial	regulatory scope of
		statements	consolidation
		As on reporting date	As on reporting date
Α	Capital & Liabilities		
i	Paid-up Capital	775.00	775.00
	Reserves & Surplus	5115.49	5115.49
	Minority Interest		
	Total Capital	5890.49	5890.49
ii	Deposits	74125.89	74125.89
	of which: Deposits from	5913.06	5913.06
	banks		
	of which: Customer deposits	68212.83	68212.83
	of which: Other deposits (pl.		
	specify)		
iii	Borrowings	0.00	0.00
	of which: From RBI		
	of which: From banks	0.00	0.00
	of which: From other		
	institutions & agencies		
	of which: Others (pl. specify)		
	of which: Capital instruments		
iv	Other liabilities & provisions	1806.27	1806.27
	Total	81822.65	81822.65
_			
В	Assets	2445 74	0445 74
i	Cash and balances with	3415.71	3415.71
	Reserve Bank of India	15701 53	15701 52
	Balance with banks and	15791.52	15791.52
	money at call and short notice		
ii	Investments:	23190.15	23190.15
"	of which: Government	20552.11	20552.11
	securities	20332.11	20332.11
	of which: Other approved		
	securities		
	of which: Shares		
	of which: Debentures &	2429.33	2429.33
	Bonds	2123133	2 123133
	of which: Subsidiaries / Joint		
	Ventures / Associates		
	of which: Others (Commercial	239.49	239.49
	Papers, Mutual Funds &		
	shares etc.)		
	Less Depreciation	30.78	30.78
iii	Loans and advances	36477.00	36477.00
	of which: Loans and advances	0.00	0.00
	to banks		
	of which: Loans and advances	40285.92	40285.92

	to customers		
	Netting items	3808.92	3808.92
iv	Fixed assets	328.36	328.36
٧	Other assets	2619.91	2619.91
	of which: Goodwill and intangible assets		********
	of which: Deferred tax assets		
vi	Goodwill on consolidation		
vii	Debit balance in Profit & Loss		
	account		
	Total Assets	81822.65	81822.65

Step 2

	p 2	Balance sheet as in financial statements	under regulatory scope of consolidation	Ref No.
		As on reporting date	As on reporting date	
Α	Capital & Liabilities			
i	Paid-up Capital	775.00	775.00	a1
	of which: Amount eligible for CET1	775.00	775.00	
	of which: Amount eligible for AT1			
	Reserves & Surplus	5115.49	5115.49	
	of which:			
	-Statutory Reserve	1671.88	1671.88	
	-Share Premium	775.00	775.00	a2
	-Capital Reserve	164.42	164.42	
	<ul> <li>Revaluation of Fixed Assets</li> </ul>		164.42	
	. Other Reserve	0.00	0.00	
	-Revenue and Other Reserve	2504.19	2504.19	
	Investment Reserve Account			
	Reserve or Bad and Doubtful Debts	0.00	0.00	
	.Other reserve-deferred tax	0.00	0.00	
	Other Reserve	2087.73	2087.73	
	Investment Fluctuation.	120.72	120.72	
	Investment Reserve Account	40.38	40.38	
	Special reserve u/s36	255.36	255.36	
	-Current period Loss			
	Total Capital	5890.49	5890.49	
ii	Deposits	74125.89	74125.89	
	of which: Deposits from banks	5913.06	5913.06	
	of which: Customer deposits	68212.83	68212.83	

vii viii	<del> </del>	81822.65	81822.65	
	Goodwill on consolidation Debit balance in Profit & Loss			
	Goodwill on consolidation			
	†		<del> </del>	
	of which. Deferred toy peects			
	intangible assets			
	of which: Goodwill and			
vi	Other assets	2619.91	2619.91	
	intangible assets			
Ť	of which: Goodwill and			
V	Fixed assets	328.36	328.36	
	Netting items	3808.92	3808.92	
	to customers	40285.92	40203.92	
	to banks of which: Loans and advances	4030E 03	40285.92	
	of which: Loans and advances	0.00	0.00	
iv	Loans and advances	36477.00	36477.00	
	Less Depreciation	30.78	30.78	
	etc.)			
	Papers, Mutual Funds, shares	-		
	of which: Others (Commercial	239.49	239.49	
	Ventures / Associates			
	Bonds of which: Subsidiaries / Joint			
	of which: Debentures &	2429.33	2429.33	
	of which: Shares	2420.22	2420.22	
	securities			
	of which: Other approved			
	securities			
	of which: Government	20552.11	20552.11	
iii	Investments:	23190.15	23190.15	
L	notice			
	money at call and short	10, 51.52	10,01.02	
ii	Balance with banks and	15791.52	15791.52	
	Reserve Bank of India	3415./1	3413./1	
<b>В</b>	Assets Cash and balances with	3415.71	3415.71	
_	Acceta			
	Total	81822.65	81822.65	
	intangible assets			
	of which: DTLs related to			
	goodwill			
· •	of which: DTLs related to			
iv	Other liabilities & provisions	1806.27	1806.27	
	of which: Capital instruments			
	institutions & agencies of which: Others (pl. specify)			
	of which: From other	0.00	0.00	
-	of which: From banks	0.00	0.00	
	of which: From RBI			
iii	Borrowings	0.00	0.00	
	specify)			
	of which: Other deposits (pl.			

Step 3

	Extract of Basel III common disclosure template (with added column) - Table DF-11 (Part I / Part II whichever, applicable)			
<b> </b> ''	Common Equity Tier 1 capital: instruments and reserves			
	Common Equity Tion 2	Component of regulatory capital reported by bank		
1	Directly issued qualifying common share (and equivalent for non-joint stock companies) capital plus related stock surplus	1550.00	a1 & a2	
2	Retained earnings			
3	Accumulated other comprehensive income (and other reserves)	4088.96		
4	Directly issued capital subject to phase out from CET1 (only applicable to non-joint stock companies)			
5	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)			
6	<b>Common Equity Tier 1 capital</b>	5638.96		
	before regulatory			
$\vdash$	adjustments			
7				
8	Goodwill (net of related tax liability)			

### **Table DF-13: Main Features of Regulatory Capital Instruments**

Bank has not issued any kind of regulatory instruments.

### Table DF-16: Equities: Disclosures for Banking Book Positions

Investments are classified at the time of purchase into Held for Trade (HFT), Available for Sale (AFS), Held to Maturity (HTM) categories in line with the RBI master circular- Prudential Norms for classification, valuation and operation of investments portfolio by Banks. In accordance with the RBI guidelines, investments in equity of subsidiaries and joint ventures are required to be classified under HTM category. For capital adequacy purpose, as per the RBI guidelines, equity securities held under HTM category are classified under Banking book.

Bank does not have any equities under banking book

### **Leverage Ratio**

The Basel III leverage ratio is defined as the capital measure (Tier-1 capital of the risk based capital framework) divided by the exposure measure, with this ratio expressed as a percentage. The Bank is required to maintain a minimum leverage ratio of 3.50%. As per RBI guidelines, disclosures required for leverage ratio for the Bank as of March 31st, 2021 is as follows:

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

S.No.	Item	(Rs. in Million)
1	Total consolidated assets as per published financial statements	81822.65
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	
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)	8181.52
7	Other adjustments	-5162.16
8	Leverage ratio exposure	84842.01

Table DF-18: Leverage Ratio Common Disclosure Template

S. No.	Item	Leverage ratio framework (Rs. in Million)
	On-balance sheet exposures	
1	On-balance sheet items (excluding derivatives and SFTs, but including collateral)	81822.65
2	(Asset amounts deducted in determining Basel III Tier 1 capital)	
3	<b>Total on-balance sheet exposures</b> (excluding derivatives and SFTs) (sum of lines 1 and 2)	81822.65
	Derivative exposures	
4	Replacement cost associated with all derivatives transactions (i.e. net of eligible cash variation margin)	
5	Add-on amounts for PFE associated with all derivatives transactions	
6	Gross-up for derivatives collateral provided where deducted	

22	Basel III leverage ratio	6.65%
	Leverage ratio	
21	Total exposures (sum of lines 3, 11, 16 and 19)	84842.01
20	Tier 1 capital	5638.96
	Capital and total exposures	
19	Off-balance sheet items (sum of lines 17 and 18)	3019.36
18	(Adjustments for conversion to credit equivalent amounts)	-5162.16
17	Off-balance sheet exposure at gross notional amount	8181.52
	Other off-balance sheet exposure	
	of lines 12 to 15)	
16	Total securities financing transaction exposures (sum	
15	Agent transaction exposures	
14	CCR exposure for SFT assets	
	gross SFT assets)	
13	(Netted amounts of cash payables and cash receivables of	
	adjusting for sale accounting transactions	
12	Gross SFT assets (with no recognition of netting), after	
	Securities financing transaction exposures	
11	Total derivative exposures (sum of lines 4 to 10)	
10	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	
9	Adjusted effective notional amount of written credit derivatives	
8	(Exempted CCP leg of client-cleared trade exposures)	
7	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	
	from the balance sheet assets pursuant to the operative accounting framework	