



Standard Chartered Bank – India Branches

(Incorporated in the United Kingdom with limited liability)

Risk review and disclosures under Basel II Framework for the year ended 31 March 2013

1. Background

The Standard Chartered Group (SCB Group or the Group) is an international banking and financial services group particularly focused on the markets of Asia, Africa and the Middle East. It has a network of 1,700 branches and outlets in more than 68 countries and territories; and over 89,000 employees. The Group was regulated by its home regulator, viz. Financial Services Authority (FSA), in the United Kingdom (UK). On 1 April 2013, the FSA has ceased to exist, and from this date, Standard Chartered Bank is regulated by the Financial Conduct Authority and Prudential Regulation Authority.

SCB India (SCBI or the Bank) is a branch of Standard Chartered Bank UK, which is part of the SCB Group. The ultimate parent company of the Bank is Standard Chartered PLC, which is listed on the London Stock Exchange and the Stock Exchanges of Hong Kong and India. Indian branch operations are conducted in accordance with the banking license granted by the Reserve Bank of India (RBI) under the Banking Regulation Act 1949.

2. Overview

The Basel Committee on Banking Supervision published a framework for International Convergence of Capital Measurement and Capital Standards (commonly referred to as Basel II), which replaced the original 1988 Basel I Accord. The RBI adopted the same in March 2008. The Basel III implementation schedule for India commences from 1 April 2013 and is phased in through to 31 March 2018. Accordingly, for 31 March 2013 reporting purposes, the Bank has calculated its Pillar 1 capital requirement based on Basel II norms.

Basel II is structured around three “pillars” which are outlined below:

- Pillar 1 sets out minimum regulatory capital requirements – the minimum amount of regulatory capital banks must hold against the risks they assume;
- Pillar 2 sets out the key principles for supervisory review of a bank’s risk management framework and its capital adequacy. It sets out specific oversight responsibilities for the Board and senior management, thus reinforcing principles of internal control and other corporate governance practices; and
- Pillar 3 aims to bolster market discipline through enhanced disclosure by banks.

Basel II provides three approaches of increasing sophistication to the calculation of credit risk capital; the Standardised Approach (SA), the Foundation Internal Ratings Based Approach and the advanced Internal Ratings Based Approach (IRB). Basel II also introduced capital requirements for operational risk (OR) for the first time.

3. Scope of Basel II Framework

3.1. Pillar 1

The SCB Group and local management of the Indian operations recognise that Basel II is a driver for continuous improvement of risk management practices and believe that adoption of leading risk management practices are essential for achieving its strategic intent. Accordingly, the Group has adopted the IRB model for the measurement of credit risk covering 80% of the portfolio. The Group applies Value at Risk (VaR) model for market risk capital and The Standardised Approach for determining its OR capital requirements. SCBI has adopted RBI’s prevailing Basel II regulations related to SA for credit and market risk and Basic Indicator Approach (BIA) for OR for computing local regulatory Pillar 1 capital.

In accordance with RBI guidelines, the Bank computes its capital under both Basel I and Basel II requirements. The minimum regulatory capital is the higher of Basel II and 80% of Basel I (prudential floor). Post 31 March 2013, the RBI has done away with the Basel I prudential floor.

3.2. Pillar 2

Pillar 2 requires banks to undertake a comprehensive assessment of their risks and to determine the appropriate amounts of capital to be held against these risks where other suitable mitigants are not available. This risk and capital assessment is commonly referred to as an Internal Capital Adequacy Assessment Process (ICAAP). The range of risks that need to be covered by the ICAAP is much broader than Pillar 1, which covers only credit risk, market risk and OR.

The Group has developed an ICAAP framework which closely integrates the risk management and capital assessment processes and ensures that adequate levels of capital are maintained to support the current and projected demand for capital under expected and stressed conditions. The ICAAP framework has been designed to be applied consistently across the organisation to meet the Pillar 2 requirements of local regulators. As a branch of a foreign bank in India, the India ICAAP is largely based on the Group ICAAP framework, so as to maintain consistency in reporting of the risk and capital management aspects. However, wherever necessary, local customisation has been incorporated to align with the RBI requirements.

3.3. Pillar 3

Pillar 3 aims to provide a consistent and comprehensive disclosure framework that enhances comparability between banks and further promotes improvements in risk management practices. The Bank has implemented the requirements laid down by RBI for Pillar 3 disclosure, covering both the qualitative and quantitative items. These are also published in the Bank’s annual report and hosted on the Bank’s website.



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The risk related disclosures and analysis provided herein below, are primarily in the context of the disclosures required under the RBI's Pillar 3 – Market Discipline of the New Capital Adequacy Framework (commonly referred to as NCAF) and are in respect of SCBI, except where required and specifically elaborated, to include other Group entities operating in India. The information provided has been reviewed by senior management and is in accordance with the guidelines prescribed by the RBI.

3.4. Accounting and Prudential Treatment / Consolidation Framework

The consolidation norms for accounting are determined by the prevailing Indian Generally Accepted Accounting Principles (GAAP). The regulatory requirements are governed by RBI guidelines. The differences between consolidation for accounting purposes and regulatory purposes are mainly on account of following reasons:

- 1) Control over other entities to govern the financial and operating policies of the subsidiaries or joint ventures
As per Indian GAAP, existence of control/joint control to govern the financial and operating policies of the subsidiary or joint venture is necessary for accounting consolidation. However, certain entities such as Non Banking Finance Companies (NBFC) have to be consolidated for regulatory capital adequacy purposes even where the above requirement is not fulfilled. Such cases are where the ability to control financial and operating policies of the entities legally vests with the Parent or Group entities and not with the India branch operations.
- 2) Nature of business of the entities to be consolidated
As per Indian GAAP, subsidiaries are not excluded from consolidation because of dissimilar nature of business activities between subsidiary and other entities within the Group. However, RBI regulations do not require consolidation of entities engaged in insurance business and businesses not pertaining to financial services.
- 3) Method of consolidation
The accounting consolidation methodology requires 'line by line' consolidation and elimination of all inter-group balances. However, for the purpose of regulatory consolidation under the capital adequacy framework, the risk weighted assets (RWA) and capital requirements for each entity can be computed separately by applying the Basel II norms as applicable for a bank and simply added together with that of the lead bank in the consolidated group. The Bank has adopted the latter approach for consolidation of entities for limited purpose of capital adequacy framework, as the accounting consolidation method is not appropriate considering the legal ownership pattern of the consolidated entities.

Details of the entities consolidated for regulatory purposes is summarised below:

Name of the entity	Status for regulatory purposes	Nature of business	Description of the entity	Type of consolidation
Standard Chartered Bank India Branches	Licensed bank in India	Banking and financial services	Branch operation of foreign bank viz. SCB, UK	Full
St. Helens Nominees India Pvt. Limited	Fully owned subsidiary of SCBI	Nominee business – holding shares/debentures in limited companies on behalf of SCBI and its customers. Security trusteeship business for SCBI.	Private Limited Company incorporated under Indian Companies Act	Full
Standard Chartered Investments and Loans India Limited	Entity controlled by SCBI's Parent/Group	Financial services acceptable for an NBFC, other than accepting public deposits, e.g. lending, investments, etc.	a) Private Limited Company incorporated under Indian Companies Act b) NBFC registered with RBI and categorised as non deposit taking systemically important NBFC	Full
Standard Chartered Securities (India) Limited	Entity controlled by SCBI's Parent/Group	Category I merchant banker, rendering broking services to retail and institutional customers and depository services	Limited Company incorporated under Indian Companies Act	Full

Quantitative Disclosures

The aggregate amount of capital deficiencies in all subsidiaries not included in the consolidation, i.e., that are deducted and the name(s) of such subsidiaries. NIL

The aggregate amounts (e.g., current book value) of the bank's total interests in insurance entities, which are risk-weighted, as well as, their name, their country of incorporation or residence, the proportion of ownership interest and, if different, the proportion of voting power in these entities. In addition, indicate the quantitative impact on regulatory capital of using this method versus using the deduction. NIL



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4. Capital Management

4.1. Objectives

The Bank's capital management approach is driven by its desire to maintain a strong capital base to support the development of its business and to meet regulatory capital requirements at all times.

4.2. Approach

Strategic, business and capital plans are drawn up annually covering a five year horizon. The plans ensure that adequate levels of capital and an optimum mix are maintained by the Bank to support its strategy. This is integrated with the Bank's annual planning process which takes into consideration business growth assumptions across products and the related impact on capital resources.

The capital plan takes the following into account:

- Regulatory capital requirements and our assessment of future standards;
- Demand for capital due to business growth, market stresses and potential risks; and
- Available supply of capital and capital raising options.

The Group uses internal models and other quantitative techniques in its internal risk and capital assessment at an overall Group level. The Bank also considers additional risk types other than those considered under Pillar 1 as part of its ICAAP. Each material risk is assessed, relevant mitigants considered, and appropriate levels of capital determined.

Stress testing and scenario/sensitivity analysis are used to assess the Bank's ability to sustain operations during periods of extreme but plausible events. They provide an insight into the potential impact of significant adverse events on the Bank's earnings, risk profile and capital position and how these could be mitigated.

The capital that the Bank is required to hold by the RBI is mainly determined by its balance sheet, off-balance sheet and market risk positions, after applying collateral and other risk mitigants.

4.3. Governance

The Group operates processes and controls to monitor and manage capital adequacy across the organisation. At a country level, capital is maintained on the basis of the local regulator's requirements. It is overseen by the country Asset and Liability Committee (ALCO), which is responsible for managing the country balance sheet, capital and liquidity, with the active support and guidance from Group ALCO (GALCO), Group Capital Management Committee (GCMC) and Group Treasury (GT). The responsibility of capital management has been assigned to a dedicated sub-group of ALCO, the Capital Management Group (CMG), which meets at least once a month. The capital management process is governed by the Capital Planning Framework.

Suitable processes and controls are in place to monitor and manage capital adequacy and ensure compliance with local regulatory ratios in all legal entities. These processes are designed to ensure that each entity and the consolidated Bank have sufficient capital available to meet local regulatory capital requirements at all times.

4.4. Mobility of Capital Resources

The Bank operates as a branch in India, hence under current RBI regulations it cannot raise capital externally. The Group's policy in respect of profit repatriation requires that each local entity should remit its profits that are considered surplus to local regulatory minimum requirements. The amount to be remitted/injected and the mix/mode of capital (Tier 1 v/s Tier 2) is determined in conjunction with GT, after taking into account local capital adequacy regulations (inclusive of any regulatory buffers), anticipated changes to those regulations, forecast organic growth and Head Office (HO) return expectations.

4.5. Capital Structure

Tier 1 capital mainly comprises of:

- i) Capital funds injected by HO.
- ii) Net profits of each year retained as per statutory norms (currently 25%).
- iii) Remittable net profits retained in India for meeting minimum regulatory capital requirements.
- iv) Capital reserves created out of profits on account of sale of immovable properties and held to maturity investments, as per RBI regulations.

The above are not repatriable/distributable to HO as long as the Bank operates in India.

Tier 2 capital mainly comprises of:

- i) 45% of reserve created on periodic revaluation of immovable properties in accordance with the Indian GAAP.
- ii) General provisions on standard (performing) assets created as per RBI regulations.
- iii) Reserve created out of unrealised gain on revaluation of investments as per RBI regulations.
- iv) Subordinated debts from HO in foreign currency. These are unsecured, unguaranteed and subordinated to the claims of other creditors, including without limitation, customer deposits and deposits by banks. Refer note 18(E)(3)(ii) of the financial statements for details of outstanding subordinated debts.

As per RBI's Basel II regulations, Tier 2 capital cannot exceed 100% of Tier 1, subordinated debts cannot exceed 50% of Tier 1 and general provisions qualifying as Tier 2 is restricted to 1.25% of RWA.



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4.6. Capital and RWA

(₹ in 000s)

	31.3.2013		
	Solo Bank*	Consolidated Basis*	
	Basel II	Basel I	Basel II
Tier 1 Capital :	142,609,833	143,000,610	150,123,722
Head Office Capital	27,257,992	27,257,992	27,257,992
Paid-up capital of subsidiaries / associates	–	–	6,169,657
Eligible reserves	130,889,351	130,889,352	132,289,442
Intangible assets	(13,594,232)	(13,594,232)	(13,650,091)
Unconsolidated subsidiaries/associates	(50)	(50)	(50)
Other regulatory adjustments	(1,943,228)	(1,552,452)	(1,943,228)
Tier 2 Capital :	34,791,055	35,181,830	34,814,008
Eligible revaluation reserves	4,551,436	4,551,436	4,551,436
General provision and other eligible reserves/provisions	6,845,848	6,845,846	6,868,801
Debt capital instruments eligible to be reckoned as capital funds and included in Lower Tier 2 (of which amount raised during the year ₹. Nil)	27,142,500	27,142,500	27,142,500
Less: Amortisation of qualifying subordinated debts	(2,714,250)	(2,714,250)	(2,714,250)
Other regulatory adjustments	(1,034,479)	(643,702)	(1,034,479)
Total capital base	177,400,888	178,182,440	184,937,730
Minimum regulatory capital requirements			
Credit risk	104,207,680	88,957,762	105,197,100
Standardised approach portfolios	89,708,068	–	90,697,488
Securitisation exposures	9,000	–	9,000
Counterparty Risk on FX and Derivatives	14,490,612	–	14,490,612
Market Risk – Standardised Duration Approach	8,425,121	10,983,016	8,427,871
Interest rate risk	7,544,762	10,102,657	7,544,762
Foreign exchange risk (including gold)	810,000	810,000	810,000
Equity risk	70,359	70,359	73,109
Operational risk – Basic indicator approach	10,159,913	–	10,342,932
Total minimum regulatory capital requirements	122,792,714	99,940,778	123,967,903
Risk weighted assets and contingents			
Credit risk	1,157,863,108	988,419,578	1,168,856,675
Market risk (including counterparty/settlement risks)	93,612,454	122,033,516	93,643,010
Operational risk – Basic indicator approach	112,887,923	–	114,921,478
Total Risk weighted assets and contingents	1,364,363,485	1,110,453,094	1,377,421,163
Capital ratios			
Tier 1 capital	10.45%	12.88%	10.90%
Tier 2 capital	2.55%	3.17%	2.53%
Total capital	13.00%	16.05%	13.43%



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(₹ in 000s)

	31.3.2012		
	Solo Bank*		Consolidated Basis*
	Basel II	Basel I	Basel II
Tier 1 Capital :	102,082,696	102,449,575	107,767,442
Head Office capital	6,757,992	6,757,992	6,757,992
Paid-up capital of subsidiaries / associates	–	–	5,075,257
Eligible reserves	110,843,234	110,843,234	112,089,270
Intangible assets	(13,562,380)	(13,562,380)	(14,197,315)
Unconsolidated subsidiaries / associates	(50)	(50)	(50)
Other regulatory adjustments	(1,956,100)	(1,589,221)	(1,957,712)
Tier 2 Capital :	35,626,405	35,993,285	35,637,302
Eligible revaluation reserves	4,790,992	4,790,992	4,790,992
General provision and other eligible reserves/provisions	6,432,392	6,432,392	6,444,900
Debt capital instruments eligible to be reckoned as capital funds and included in Lower Tier 2 (of which amount raised during the year ₹. Nil)	25,437,500	25,437,500	25,437,500
Other regulatory adjustments	(1,034,479)	(667,599)	(1,036,090)
Total Capital Base	137,709,101	138,442,860	143,404,744
Minimum Regulatory Capital Requirements			
Credit Risk	96,136,043	89,113,873	96,775,462
Standardised approach portfolios	76,007,125	–	76,646,544
Securitisation exposures	–	–	–
Counterparty Risk on FX and Derivatives	20,128,918	–	20,128,918
Market Risk – Standardised Duration Approach	6,275,521	8,182,983	6,278,859
Interest rate risk	5,887,134	7,794,597	5,887,134
Foreign exchange risk (including gold)	360,000	360,000	360,000
Equity Risk	28,387	28,386	31,725
Operational Risk – Basic Indicator Approach	9,705,684	–	9,894,048
Total Minimum Regulatory Capital Requirements	112,117,248	97,296,856	112,948,369
Risk Weighted Assets and Contingents :			
Credit Risk	1,068,178,257	990,154,145	1,075,282,901
Market risk (including counterparty/settlement risks)	69,728,012	90,922,038	69,765,101
Operational Risk – Basic Indicator Approach	107,840,933	–	109,933,855
Total Risk Weighted Assets and Contingents	1,245,747,202	1,081,076,183	1,254,981,857
Capital Ratios			
Tier 1 Capital	8.19%	9.48%	8.59%
Tier 2 Capital	2.86%	3.33%	2.84%
Total Capital	11.05%	12.81%	11.43%

* Solo Bank represents the main licensed bank of the Group in India and consolidated basis includes Group controlled entities operating in India and consolidated for the limited purpose of capital adequacy framework.



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5. Risk Management

The Bank has a strong governance culture and framework for risk management. The Bank's risk management principles align with those established at a Group level, and are customised to meet the local regulatory requirements. One of the main risks incurred arises from extending credit to customers through trading and lending operations. Beyond credit risk, the Bank is also exposed to a range of other risk types such as market, operational, liquidity, pension, country cross border, reputational, strategic and other risks that are inherent to its strategy, product range and geographical coverage.

5.1. Risk Management Framework (RMF)

The Bank adds value to customers and generates returns for shareholders by taking and managing risk in line with strategy and within risk appetite. Risk management is the set of end-to-end activities through which the Bank makes risk-taking decisions and controls and optimises its risk-return profile. It is a Bank-wide activity and starts at the front-line.

The management of risk lies at the heart of the Bank's business. Effective risk management is a central part of the financial and operational management of the Bank and is fundamental to its ability to generate profits consistently and maximise the interest of its stakeholders.

The Bank's risk and capital assessment processes are built upon its RMF and governance structure. The RMF establishes common principles and standards for the management of and control of all risks, and to inform behaviour across the organisation. The core components of the RMF include the Bank's risk classifications, risk principles and standards, definitions of roles and responsibilities and governance structure. Under this framework, there are three lines of defence.

- The First Line of Defence is that all employees are required to ensure the effective management of risks within the scope of their direct organisational responsibilities.
- The Second Line of Defence comprises the Risk Control Owners (RCO), supported by their respective control functions. RCOs are responsible for ensuring that the residual risks within the scope of their responsibilities remain within appetite. There are three central aspects to discharging this responsibility: the identification of material risks; maintaining an effective control environment; and understanding and accepting levels of residual risk. The Second Line is independent of the origination, trading and sales functions to ensure that the necessary balance and perspective is brought to risk/return decisions. This is particularly important given that revenues are recognised immediately while losses arising from risk positions only manifest themselves over time. The Second Line has the authority to challenge and stop business activities (within the scope of their control responsibilities) where risks are not aligned with control requirements or risk appetite.
- The Third Line of Defence comprises the independent assurance provided by the Group Internal Audit (GIA) function, which has no responsibilities for any of the activities it examines. GIA provides independent assurance of the effectiveness of management's control of its own business activities (the First Line) and of the processes maintained by the Risk Control Functions (the Second Line). As a result, GIA provides assurance that the overall system of control effectiveness is working as required within the RMF. The findings from GIA's audits are reported to all relevant management and governance bodies – accountable line managers, relevant oversight function or committee and committees of the Board. The role of GIA is defined and overseen by the Audit Committee and is set out in the Group's Internal Audit Charter.

5.2. Risk Governance

The Bank has a committee governance structure which ensures that risk-taking authority and risk management policies are cascaded down from its Management Committee (MANCO) to the appropriate functional, divisional and country-level committees. Information regarding material risk issues and compliance with policies and standards is communicated through the business and functional committees up to the Group-level committees, as appropriate.

Ultimate responsibility for overall management and governance of the Bank, approval of long-term objectives and commercial strategy, implementing risk appetite and risk management, capital management and optimisation; effective cooperation and coordination between businesses rests with the MANCO. It is chaired by the Country Chief Executive Officer (CEO). Its membership also includes functional heads of the businesses, control and support functions in India. The MANCO comprises senior bankers who are well qualified, experienced and competent individuals and are well acknowledged in their respective fields. The MANCO meets on a monthly basis.

The governance structure of the Bank also reflects the Group's functional structure, and therefore, the various functional heads and country committees have reporting lines to their Group functional heads and committees as well as to the Country CEO.



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The following committees are the primary committees with oversight of risk and capital for the Bank on behalf of the MANCO:

Committee (delegated authority from)	Purpose	Members	Frequency of meetings
ALCO (MANCO)	Responsible for the management of capital and liquidity and the establishment of and compliance with policies relating to balance sheet management, including management of the Bank's liquidity and capital adequacy.	<ul style="list-style-type: none"> ■ CEO (Chair) ■ Chief Financial Officer (CFO) ■ Country Chief Risk Officer (CCRO) ■ Business Heads ■ Retail Banking products Head ■ Asset Liability Management (ALM) Head ■ Economist ■ Financial Controller ■ Financial and Management Accounting Head 	Monthly
Country Risk Committee (CRC) (MANCO)	Responsible for the effective management of risks in support of business strategy within the boundaries set by the MANCO and business level risk committees. It is responsible for implementing the RMF, including assignment of the roles and responsibilities of RCO locally. It is also responsible for ensuring that the risk exposures for all types of risks, other than those covered by ALCO, remain within the overall risk appetite and within any specific boundaries advised by MANCO and business risk committees.	<ul style="list-style-type: none"> ■ CCRO (Chair) ■ CEO (Alternate Chair) ■ CFO ■ Head of Compliance ■ Business Heads 	Bi-monthly

Key sub-committees include:

- A. The Liquidity Management Committee (LMC) is a sub-committee of the ALCO which manages liquidity for the Bank. It includes members from Finance, ALM and the businesses. LMC meets monthly.
- B. The CMG is a sub-committee of the ALCO which manages capital. It is chaired by the CFO and includes members from Finance, Risk and the businesses. CMG meets monthly.
- C. The Stress Test Committee (STC) is a subcommittee of the CRC. It comprises members from the Finance and Risk functions and the Country Economist and is responsible for reviewing and challenging the stress scenario used in the ICAAP. It is also responsible for reviewing the results of the ongoing stress testing and providing recommendations to CRC. The STC is chaired by the CCRO and meets on a quarterly basis.
- D. The Country Operational Risk Committee (CORC) is a sub-committee of the CRC. It exercises oversight of the Bank's OR exposure to ensure that it is managed in a manner consistent with the RMF. The CORC meets monthly to review the Bank's significant risk exposures and to ensure appropriateness and adequacy of mitigating action plans. The CEO/CCRO is the chairman of the CORC.

5.3. The Risk function

The CCRO manages the Risk function which is independent of the businesses. The CCRO also chairs the CRC and is a member of the MANCO. The role of the Risk function is:

- To maintain the RMF, ensuring it remains appropriate to the Bank's activities and is effectively communicated and implemented across the Bank and for administering related governance and reporting processes.
- To uphold the integrity of the Bank's risk/return decisions, and in particular for ensuring that risks are properly assessed, that risk/return decisions are made transparently on the basis of this proper assessment, and are controlled in accordance with its standards and risk appetite.
- To exercise direct risk control ownership for credit, market, country cross-border, short-term liquidity and operational risk types.

The Risk function is independent of the origination, trading and sales functions to ensure that the necessary balance in risk/return decisions is not compromised by short-term pressures to generate revenues. This is particularly important given that most revenues are recognised immediately while losses arising from risk positions only manifest themselves over time.



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In addition, the Risk function is a centre of excellence that provides specialist capabilities of relevance to risk management processes in the wider organisation.

5.4. Risk Appetite

The Group/Bank manages its risks to build a sustainable franchise in the interests of all stakeholders. The Group Risk Appetite Statement (the RAS) is the Standard Chartered PLC's Board of Directors' articulation of the amount of risk that the Group is willing to take in the pursuit of its strategic goals. When setting risk appetite, it considers overall risk management strategy/approach and appropriate margin between actual risk exposure and its risk capacity. At a country level, a detailed risk appetite assessment is performed annually, where a country's portfolio is assessed for how it contributes towards upholding the RAS and to assess key issues and potential concerns around the country's business strategy and portfolio composition. The assessment of the country portfolio's contribution to the Group's risk appetite is performed through a 'bottom-up' analytical approach at a business/customer segment/product level.

Given the different revenue, cost and risk parameters associated with the various products offered by the Bank, changes to the assumptions about business mix, asset quality and collateral have a direct impact on the aggregate level of projected credit losses, profits, capital consumption and returns in all economic conditions. A number of levers are therefore used by management to adjust the risk profile, capital consumption and business performance ahead of stress events. Examples include caps on unsecured exposures in Consumer Bank (CB), portfolio caps by industry sectors and increasing collateralisation rates in Wholesale Bank (WB) to lower loss given default in the portfolio.

The risk appetite forms the basis for establishing the risk parameters within which the businesses must operate, including policies, concentration limits and business mix. The Group Risk Committee (GRC) and GALCO are responsible for ensuring that the Group's risk profile is managed in compliance with the risk appetite set by the Board; MANCO, CRC and ALCO are responsible for the same at country level.

5.5. Stress Testing

Stress testing and scenario analysis are used to assess the Bank's ability to maintain operations that are consistent with its risk appetite during periods of severe but plausible stress conditions and to simulate the set of feasible management actions and their impact on the Bank's earnings, risk profile and capital position, should such conditions materialise. These conditions may arise from economic, liquidity, legal, political or physical events, or from materialisation of risks that are unique to the Bank.

The stress testing framework is designed to:

- Contribute to the setting and monitoring of risk appetite;
- Identify the key risks to strategy, financial position and reputation;
- Support the development of mitigating actions and contingency plans;
- Ensure effective governance, processes and systems are in place to co-ordinate and integrate stress testing;
- Inform senior management; and
- Ensure adherence to regulatory requirements.

A Group level STC, led by the Risk function with participation from the businesses, Group Finance, Global Research and GT, aims to ensure that the earnings and capital implications of specific stress scenarios are fully understood allowing informed mitigation actions and construction of contingency plans. The STC generates and considers pertinent and plausible scenarios that have the potential to adversely affect the Group/Bank's business.

The India STC leverages on work done by Group and, in addition, reviews scenarios specific to the local context, including for ICAAP. Stress tests/impact analysis done in India during 2012-13 included increased level of inflation, commodity price volatility assessment, telecom sector review, inflation, refinance risk, fall in diamond prices, oil price increase, mortgage portfolio review, etc.

6. Credit Risk

Credit risk is the potential for loss due to the failure of counterparty to meet its obligations to pay the Bank in accordance with agreed terms. Credit exposures may arise from both, the banking and trading books.

Credit risk is managed through a framework that sets out policies and procedures covering the measurement and management of credit risk. There is a clear segregation of duties between transaction originators who are in the business units and approvers in the risk function. All credit exposure limits are approved within a defined credit approval authority framework.

6.1. Credit Policies

Group-wide credit policies and standards are considered and approved by the GRC, which also oversees the delegation of credit approval and loan impairment provisioning authorities. Policies and procedures specific to each business are established by authorised risk committees within WB and CB. The WB Monitoring and Control Policy and the CB Management Information Systems and Reporting Framework provide the outline for how credit risk should be monitored and managed in the Bank. These are consistent with the Group-wide credit policies, but are more detailed and adapted to reflect the different risk environments and portfolio characteristics. These Group policies/procedures are customised locally to incorporate any local regulatory and governance needs.



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6.2. Credit Assessment Process

Wholesale Banking

Within the WB business a pre-sanction appraisal is carried out by the relationship manager through a Business Credit Application (BCA). BCAs are reviewed and duly approved by the relevant credit authority using an alphanumeric grading system for quantifying risks associated with counterparty. The grading is based on a Probability of Default (PD) measure, with customers analysed against a range of quantitative and qualitative measures. The numeric grades run from 1 to 14 and some of the grades are further sub-classified A, B or C. Lower credit grades are indicative of a lower likelihood of default. Credit grades 1A to 12C are assigned to performing customers or accounts, while credit grades 13 and 14 are assigned to non-performing or defaulted customers. The Bank's credit grades are not intended to replicate external credit grades, and ratings assigned by external ratings agencies are not used in determining the Bank's internal credit grades. Nonetheless, as the factors used to grade a borrower may be similar, a borrower rated poorly by an external rating agency is typically assigned a worse internal credit grade.

Loss Given Default (LGD), in addition to Exposure At Default (EAD), is used in the assessment of individual exposures and portfolio analysis. LGD is the credit loss incurred if an obligor defaults. It is used in the delegation of credit approval authority and must be calculated for every transaction to determine the appropriate level of approval. In accordance with the credit authority delegation, significant exposures are reviewed and approved centrally through a credit committee. All the credit facilities are subject to an annual credit review process.

The Bank's Credit Policy, including local/governance/regulatory needs, requires strict adherence to laid down credit procedures and deviations, if any, are approved and captured through the credit appraisal process. Sufficient checks are also undertaken at various levels, including Credit Risk Control, to ensure that deviations are justified and appropriately approved and would not result in any undue loss/risk to the Bank.

Consumer Banking

For CB, standard credit application forms are generally used, which are processed in central units using largely automated approval processes. Where appropriate to the customer, the product or the market, a manual approval process is in place. As with WB, origination and approval roles are segregated.

Distribution of credit products through the new business channel is governed by the New Business Management and Risk Policy and Procedures, which among other requirements, lays down policies governing recruitment, verification, training and monitoring of sales staff. Credit decisions are independent of the sales/marketing functions and there are clear and specific delegated authorities. Department level Key Control Standards and regular assurance reviews and audits ensure compliance to policy and delegated authorities.

Credit grades within CB are based on a PD calculated using IRB models. These models are based on application and behavioural scorecards which make use of external credit bureau information, as well as, the Bank's own data. In case of portfolios where such IRB models have not yet been developed, the PD is calculated using portfolio delinquency flow rates and expert judgement, where applicable. An alphanumeric grading system identical to that of the WB is used as an index of portfolio quality.

6.3. Credit Approval

Major credit exposures to individual counterparties, groups of connected counterparties and portfolios of retail exposures are reviewed and approved by the Group Credit Committee (GCC). The GCC derives its authority from the GRC. All other credit approval authorities are delegated by the GRC to individuals based on their judgement and experience, and based on a risk-adjusted scale which takes account of the estimated maximum potential loss from a given customer or portfolio. Credit origination and approval roles are segregated in all but a very few authorised cases. In those very few exceptions where they are not, originators can only approve limited exposures within defined risk parameters.

6.4. Credit Monitoring

The Bank regularly monitors credit exposures, portfolio performance and external trends which may impact risk management outcomes. Internal risk management reports are presented to risk committees, containing information on key environmental, political and economic trends across major portfolios, portfolio delinquency and loan impairment performance.

In WB, clients or portfolios are placed on 'Early Alert' when they display signs of actual or potential weakness. For example, where there is a decline in the client's position within the industry, financial deterioration, a breach of covenants, non-performance of an obligation within the stipulated period or there are concerns relating to ownership or management. Such accounts and portfolios are subjected to a dedicated process overseen by the Early Alert Committee (EAC). Client account plans and credit grades are re-evaluated. In addition, remedial actions are agreed and monitored. Remedial actions include, but are not limited to, exposure reduction, security enhancement, exiting the account or immediate movement of the account into the control of Group Special Assets Management (GSAM), the specialist recovery unit, which is independent of the main businesses.



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In CB, portfolio delinquency trends are monitored continuously at a detailed level. Individual customer behaviour is also tracked and is considered for lending decisions. Accounts which are past due are subject to a collections process, managed independently by the Risk function. Charged-off accounts are managed by a specialist recovery team. The small and medium-sized enterprise business is managed within CB in two distinct customer sub-segments, small businesses and medium enterprises, differentiated by the annual turnover of the counterparty. The credit processes are further refined based on exposure at risk. Larger exposures are managed through the Discretionary Lending approach, in line with WB procedures, and smaller exposures are managed through Programmed Lending, in line with CB procedures.

The CRC is responsible for the effective management of credit risk, among other risks.

The Regional Credit Issues Forum (RCIF), a sub-committee of CRC chaired by the Regional Credit Officer, meets monthly to assess the impact of external events and trends on the credit risk profile and to initiate appropriate measures to realign the portfolio and underwriting standards where necessary.

The EAC, a sub-committee of CRC, meets monthly and is responsible for identifying and monitoring corporate customers showing potential signs of weakness and/or may be exposed to higher risks. The EAC reviews the existing Early Alert portfolio and new accounts presented to the committee. It is chaired by the CEO and its membership also includes Business heads, the CCRO, Country Credit Officer, WB Senior Credit Officer, Head GSAM and Head of Credit Documentation Unit.

6.5. Concentration Risk

Credit concentration risk can arise from pools of exposures with similar characteristics which may lead to highly correlated changes in credit quality, for example individual large exposures or significantly large groups of exposures whose likelihood of default is driven by common underlying factors.

Credit concentration risk is governed by the Group's Large Exposure Policy and MANCO approved Local Lending Policy (LLP) for WB. Respective risk functions ensure adherence to these policies under the ambit of the CRC. Limits are established by the CCRO in conjunction with Group WB Risk and approved by CRC in line with Credit Reference Level framework. For CB, credit concentration risk is monitored and managed by products.

Credit concentration risk is principally managed based on two components: single-name borrower exposure and industry concentrations. For managing single-name concentrations, the Bank monitors compliance to the single and group borrower regulatory guidelines. The LLP establishes industry and credit grade concentration limits. The CRC monitors adherence to these prescribed limits. Any excesses from the ceilings prescribed in the LLP are escalated to the CCRO and/or MANCO for approval in accordance with the escalation grid established in the LLP.

CB manages product concentration risk through portfolio management approach in order to limit concentration, reduce volatility and improve profitability. As part of the annual budget, the product mix of the portfolio and the secured/unsecured share is planned and is monitored on a bi-monthly basis and reported to the CRC in country; portfolio reviews are also undertaken by the Credit Governance Committee (CGC). The exposure and the recession loss are tracked on a monthly basis against Credit Approval Document (CAD) limits on peak exposure and peak recession loss. Breaches to triggers and significant variations in thresholds are reported to the regional CB Chief Risk Officer. All significant portfolio issues, breaches to CAD triggers, and significant variations in CAD thresholds are reported to the CGC.

Both WB and CB portfolios are reviewed periodically to ensure compliance with caps and risk appetite. In respect of industry/sectoral concentration caps, the CRC monitors adherence to approved limits based on a bi-monthly review of the Bank's portfolio.

6.6. Risk Reporting and Measurement

Risk measurement plays a central role, along with judgement and experience, in informing risk-taking and portfolio management decisions. It is a primary area for sustained investment and senior management attention.

Various risk measurement systems are available to risk officers to enable them to assess and manage the credit portfolio. As the Group has adopted IRB for credit risk under Basel II, these include systems to calculate PD, LGD and EAD on a transaction, counterparty and portfolio basis. The Group has implemented a single risk reporting system to aggregate risk data. This is used to generate management information to assist Business and Risk users with risk monitoring and management.

A number of internal risk management reports are produced on a regular basis, providing information on; individual counterparty, counterparty group, portfolio exposure, credit grade migration, the status of accounts or portfolios showing signs of weakness or financial deterioration, models performance and updates on credit markets. IRB portfolio metrics are widely used in these reports. Regular portfolio risk reports are made available at risk committee meetings.

6.7. Problem Credit Management and Provisioning

Credit monitoring is undertaken on a monthly basis. In addition, account conduct is also tracked on a monthly basis in terms of past dues, excesses, documentation, compliance with covenants and progress on exit accounts through the Account Subject To Additional Review Process (ASTAR). Potential problem credits are identified through the credit monitoring process and reported to the EAC for additional review. In addition, portfolio level review for both WB and CB is undertaken to track portfolio performance against local underwriting standards/Group policy. Outcomes of such reviews are placed before the CRC.



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Wholesale Banking

Loans are classified as impaired and considered non-performing where analysis and review indicates that full payment of either interest or principal becomes questionable, or as soon as payment of interest or principal is 90 days or more overdue. Impaired accounts are managed by GSAM.

Specific provisions are made in accordance with the Bank's internal policy, subject to minimum provisions required under the RBI guidelines. When all sources of recovery have been exhausted and no further source of recovery is apparent, then the debt is written off by applying the impairment provision held.

Consumer Banking

Within CB, an account is considered to be delinquent when payment is not received on the due date. For credit cards, an account is considered delinquent upon non receipt of payment till the cycle date. For delinquency reporting purposes, the Bank follows international industry standards measuring delinquency as of 1, 30, 60, 90, 120 and 150 days past due. Accounts that are overdue are closely monitored. Loans are classified as impaired and considered non-performing where analysis and review indicates that full payment of either interest or principal becomes questionable, or as soon as payment of interest or principal is 90 days or more overdue.

The process used for raising provisions is dependent on the product category and adheres to the Bank's internal policy, subject to minimum provisions required under the RBI guidelines. In case of unsecured products, outstanding balances are written off at 150 days past due except discretionary lending. Unsecured products under discretionary lending are fully provided for at 90 days past due. In case of secured products like Mortgages, provision is raised after considering the realisable value of the collateral. For all products there are certain accounts, such as, cases involving bankruptcy, fraud and death, where the loss recognition process is accelerated.

The Bank also maintains general provision as a percentage of performing standard advances (across both WB and CB) as prescribed by the RBI to cover the inherent risk of losses.

6.8. Quantitative Disclosures

a) Analysis of total gross credit risk exposures; fund based and non-fund based separately

(₹ in 000s)

Nature and category of exposures	Credit risk exposures	
	31.03.2013	31.03.2012
Inter bank exposures	23,737,894	15,271,405
Investments (HTM)	—	—
Advances	651,516,949	583,960,332
Total gross fund based exposures	675,254,843	599,231,737
Specific provisions / Provisions for depreciation in the value of investment ¹	(28,702,452)	(28,253,496)
Total net fund based exposures	646,552,391	570,978,241
Fx and derivative contracts	357,944,470	570,181,922
Guarantees, acceptances, endorsements and other obligations	312,426,238	280,491,942
Other commitments and credit lines ²	53,074,695	41,692,366
Total gross non-fund based exposures ³	723,445,403	892,366,230
Specific provisions	(737)	(737)
Total net non-fund based exposures	723,444,666	892,365,493

¹ Excluding provision on standard assets (Previous Year: excluding floating provision and provision on standard assets).

² Excluding credit lines which are unconditionally cancellable at the Bank's sole discretion or, effectively provide for automatic cancellation of credit lines due to deterioration of borrower's creditworthiness.

³ For non-fund based exposures, credit risk exposures or, equivalents are computed as under:

- In case of exposures other than Fx and derivative contracts, credit equivalent is arrived at by multiplying the underlying contract or notional principal amounts with the credit conversion factors prescribed by the RBI under the Basel II capital framework.
- In case of Fx and derivative contracts, credit equivalents are computed using the current exposure method which includes, two steps as under:
 - Computation of current credit exposure, which is sum of the positive MTM value of the outstanding contracts.
 - Potential future credit exposure, which is determined by multiplying the notional principal amounts by the relevant 'add-on' factor based on tenor and type of underlying contracts.



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- b) Analysis of geographic distribution of exposures; fund based and non-fund based separately
 As all the exposures under Para 6.8.a) above are domestic, the analysis of geographic distribution of exposures into fund and non-fund based has not been disclosed separately.

- c) Analysis of industry wise distribution of exposures; fund based and non-fund based separately (₹ in 000s)

Nature and category of industry	As at 31.3.2013			As at 31.3.2012		
	Credit Risk Exposures			Credit Risk Exposures		
	Fund based	Non fund based	Total	Fund based	Non fund based	Total
Mining and Quarrying	6,094,180	359,391	6,453,571	6,380,764	3,081,636	9,462,400
<i>Of which:</i>						
– Coal	645,736	151,550	797,286	519,267	204,145	723,412
– Others	5,448,444	207,841	5,656,285	5,861,497	2,877,491	8,738,988
Food Processing	14,595,936	10,936,237	25,532,173	14,387,804	8,305,512	22,693,316
<i>Of which:</i>						
– Sugar	2,745,460	2,172,757	4,918,217	3,856,899	2,036,272	5,893,171
– Edible Oils and Vanaspati	1,626,166	6,165,278	7,791,444	1,756,549	4,456,065	6,212,614
– Tea	547,457	1,575,805	2,123,262	170,605	162,497	333,102
– Coffee	11	–	11	126	–	126
– Others	9,676,842	1,022,397	10,699,239	8,603,625	1,650,678	10,254,303
Beverages (excluding Tea, Coffee and Tobacco)	6,257,869	943,227	7,201,096	8,429,571	824,702	9,254,273
<i>Of which:</i>						
– Tobacco and tobacco products	4,015,366	387,550	4,402,916	5,922,264	395,073	6,317,337
– Others	2,242,503	555,677	2,798,180	2,507,307	429,629	2,936,936
Textiles	21,109,513	2,827,678	23,937,191	22,674,027	2,784,106	25,458,133
<i>Of which:</i>						
– Cotton	261,607	–	261,607	335,906	–	335,906
– Others	20,847,906	2,827,678	23,675,584	22,338,121	2,784,106	25,122,227
<i>Out of Total Textiles to Spinning Mills</i>	1,079,898	–	1,079,898	1,091,868	–	1,091,868
Leather and Leather products	895,560	159,849	1,055,409	1,046,462	103,705	1,150,167
Wood and Wood Products	784,419	1,350,135	2,134,554	901,664	669,960	1,571,624
Paper and Paper Products	6,276,414	784,489	7,060,903	5,024,113	1,281,300	6,305,413
Petroleum (non-infra), Coal Products (non-mining) and Nuclear Fuels	1,474,445	12,374,979	13,849,424	603,692	13,107,004	13,710,696
Chemicals and Chemical Products (Dyes, Paints, etc.)	33,454,669	17,615,782	51,070,451	30,798,207	15,123,369	45,921,576
<i>Of which:</i>						
– Fertilisers	875,348	742,887	1,618,235	771,563	605,004	1,376,567
– Drugs and Pharmaceuticals	18,303,901	3,361,905	21,665,806	15,867,843	2,748,346	18,616,189
– Petro-chemicals (excluding under Infrastructure)	4,821,046	4,408,040	9,229,086	6,329,059	3,929,289	10,258,348
– Others	9,454,374	9,102,950	18,557,324	7,829,742	7,840,730	15,670,472
Rubber, Plastic and their Products	4,167,625	3,210,179	7,377,804	4,576,781	2,183,472	6,760,253
Glass and Glassware	2,120,400	829,234	2,949,634	1,334,581	662,070	1,996,651
Cement and Cement Products	9,199,603	1,631,812	10,831,415	1,969,869	1,399,820	3,369,689
Basic Metal and Metal Products	35,986,335	23,016,254	59,002,589	33,173,889	22,055,194	55,229,083
<i>Of which:</i>						
– Iron and Steel	14,698,104	12,698,653	27,396,757	13,211,811	10,502,334	23,714,145
– Other Metal and Metal Products	21,288,231	10,317,601	31,605,832	19,962,078	11,552,860	31,514,938
All Engineering	30,884,168	35,819,923	66,704,091	28,100,850	32,440,406	60,541,256
<i>Of which:</i>						
– Electronics	11,801,001	16,953,033	28,754,034	7,665,806	12,365,662	20,031,468
– Others	19,083,167	18,866,890	37,950,057	20,435,044	20,074,744	40,509,788
Vehicles, Vehicle Parts and Transport Equipments	19,293,864	14,058,164	33,352,028	13,161,098	8,542,691	21,703,789



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(₹ in 000s)

Nature and category of industry	As at 31.3.2013			As at 31.3.2012		
	Credit Risk Exposures			Credit Risk Exposures		
	Fund based	Non fund based	Total	Fund based	Non fund based	Total
Aviation	–	16,450,825	16,450,825	–	15,029,824	15,029,824
Gems and Jewellery	29,581,469	5,833,747	35,415,216	20,876,147	4,418,746	25,294,893
Construction	10,627,141	11,172,855	21,799,996	11,186,205	9,973,769	21,159,974
Infrastructure	58,075,146	27,068,333	85,143,478	57,961,503	30,754,469	88,715,972
<i>Of which:</i>						
– Railways	–	129,457	129,457	–	137,017	137,017
– Roadways	8,112,856	3,260,133	11,372,989	7,783,943	5,693,872	13,477,815
– Airports	94,000	2,120	96,120	132,924	1,620	134,544
– Waterways	8,404,341	3,179,196	11,583,537	3,760,264	2,604,249	6,364,513
– Other Transport	4,869,432	4,153,331	9,022,763	6,152,795	4,285,856	10,438,651
– State Electricity Boards	1,283,484	2,491,187	3,774,671	380,353	3,296,437	3,676,790
– Gas/LNG (storage and pipeline)	80,493	–	80,493	249,642	469	250,111
– Other Energy	1,997,357	2,442,539	4,439,896	2,284,466	3,079,521	5,363,987
– Telecommunication	30,063,214	11,330,663	41,393,877	34,453,595	11,509,085	45,962,680
– Other Infrastructure	3,169,968	79,707	3,249,675	2,763,521	146,343	2,909,864
Trading and NBFC	52,221,981	28,149,693	80,371,674	64,375,648	13,854,382	78,230,030
Mortgage	91,204,608	–	91,204,608	76,404,850	–	76,404,850
Retail Others	64,013,830	1,328,508	65,342,338	51,588,927	1,328,508	52,917,435
Real Estate	62,492,891	2,505,249	64,998,140	58,834,201	2,756,976	61,591,177
Other Industries	90,704,883	93,999,695	184,704,578	70,169,479	89,810,321	159,979,800
Total Gross Advances	651,516,949	312,426,238	963,943,187	583,960,332	280,491,942	864,452,274
Specific provisions	(28,702,452)	(737)	(28,703,189)	(28,253,496)	(737)	(28,254,233)
Total Net Advances	622,814,497	312,425,501	935,239,998	555,706,836	280,491,205	836,198,041
Total Inter-bank exposures	23,737,895	–	23,737,895	15,271,405	–	15,271,405
Total Investments (HTM)	–	–	–	–	–	–

Fund based exposure comprises loans and advances, inter-bank exposures and HTM Investments. Non-fund based exposure comprises guarantees, acceptances, endorsements and letters of credit.

d) Analysis of residual contractual maturity of assets

As at 31 March 2013

(₹ in 000s)

Maturity Bucket	Cash and Bank balances with RBI	Balances with Banks and money at call and short notice	Investments	Advances	Fixed Assets	Other Assets
1 day (d)	6,029,573	7,333,045	85,299,380	29,232,059	–	19,807,161
2d - 7d	1,066,470	15,861,650	13,351,527	42,624,175	–	1,817,784
8d - 14d	1,202,868	5,000	14,905,145	43,238,532	–	838,920
15d - 28d	2,385,640	99,000	14,185,768	31,526,749	–	3,373,422
29d - 3 months (m)	7,321,921	439,200	43,538,455	92,908,732	–	52,117,866
3m - 6m	2,743,209	–	17,684,383	70,209,360	–	22,873,356
6m - 1 year (y)	2,836,296	–	42,993,032	34,536,161	–	13,816,576
1y - 3y	6,251,774	–	47,231,718	92,942,171	–	33,450,469
3y - 5y	63,404	–	14,968,264	61,874,987	–	18,833,011
> 5y	1,499,792	–	8,421,336	120,449,975	24,494,439	24,003,827
Total	31,400,947	23,737,895	302,579,008	619,542,901	24,494,439	190,932,392



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As at 31 March 2012 (₹ in 000s)

Maturity Bucket	Cash and Bank balances with RBI	Balances with Banks and money at call and short notice	Investments	Advances	Fixed Assets	Other Assets
1 day (d)	5,781,206	8,602,555	51,245,097	17,370,417	–	16,271,976
2d-7d	1,421,243	4,894,050	19,110,941	37,761,586	–	1,054,164
8d - 14d	1,086,978	55,000	14,878,903	42,183,857	–	1,491,752
15d - 28d	2,359,677	242,500	13,140,947	24,717,975	–	3,495,162
29d - 3 month(m)	7,261,062	1,477,300	40,630,828	115,256,562	–	84,118,620
3m - 6m	2,768,041	–	15,994,785	65,184,922	–	58,131,516
6m - 1 year (y)	3,129,427	–	39,333,845	37,451,249	–	36,977,595
1y - 3y	7,960,167	–	47,227,280	80,507,701	–	62,721,148
3y - 5y	57,051	–	21,833,114	30,326,616	–	33,869,341
> 5y	1,528,464	–	7,407,269	104,939,203	25,269,569	15,401,473
Total	33,353,316	15,271,405	270,803,009	555,700,088	25,269,569	313,532,747

The above has been prepared on similar guidelines as used for the statement of structural liquidity.

e) Details of Non-Performing Assets (NPAs) – Gross and Net (₹ in 000s)

Particulars	31.03.2013	31.03.2012
Sub Standard	13,573,561	8,331,132
Doubtful	5,213,825	6,417,573
– <i>Doubtful 1</i>	2,871,767	2,871,767
– <i>Doubtful 2</i>	3,091,449	3,091,449
– <i>Doubtful 3</i>	454,357	454,357
Loss	20,013,238	17,372,857
Gross NPAs	38,800,624	32,121,562
Provisions	(28,702,452)	(28,253,496)
Net NPAs	10,098,172	3,868,066
Cover ratio	73.97%	87.96%

f) NPA Ratios (₹ in 000s)

Particulars	31.03.2013	31.03.2012
Gross NPAs to gross advances	5.98%	5.50%
Net NPAs to net advances	1.63%	0.70%

g) Movement of NPAs (₹ in 000s)

Particulars	31.3.2013		31.3.2012	
	Gross	Net	Gross	Net
Balance, beginning of the year	32,121,562	3,868,066	11,477,884	1,318,896
Additions during the year	17,020,474	8,151,104	26,076,669	2,963,735
Reductions during the year	(10,341,412)	(1,920,998)	(5,432,991)	(414,565)
Balance, end of the year	38,800,624	10,098,172	32,121,562	3,868,066

h) Movement of provisions for NPAs (₹ in 000s)

Particulars	31.03.2013	31.03.2012
Balance, beginning of the year	28,253,496	10,158,988
Add: Provisions during the year	8,869,370	23,112,934
Less: Utilisation / writeback of provisions no longer required	(8,420,414)	(5,018,426)
Balance, end of the year	28,702,452	28,253,496



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i) Amount of non-performing Investments and amount of provisions held for non-performing investments		
(₹ in 000s)		
Particulars	31.03.2013	31.03.2012
Balance, beginning of the year	45,092	45,092
Additions during the year	360,752	–
Reductions during the year	(2)	–
Balance, end of the year	405,842	45,092
Total provisions held at the end of the year	400,990	45,092

j) Movement of provisions for depreciation on investments		
(₹ in 000s)		
Particulars	31.03.2013	31.03.2012
Balance, beginning of the year	1,268,109	2,800,307
Add: Provisions during the year	942,822	573
Less: Utilisation / writeback of provisions no longer required	(1,196,427)	(1,532,771)
Balance, end of the year	1,014,504	1,268,109

6.9. Credit Risk: Disclosures for portfolios subject to the standardised approach

As per the provisions of the Basel II framework in India, all banks have to mandatorily adopt the SA for measurement of credit risk. The risk weights applied under the SA are prescribed by the RBI and are based on the asset class to which the exposure is assigned. This approach permits use of external ratings for credit exposures to counterparties in the category of sovereigns, international banks, corporate and securitisation exposures. The specified credit rating agencies used for these types of exposures are as under:

Domestic Credit Rating Agencies	International Credit Rating Agencies
Credit Rating Information Services of India Limited	Standard and Poor's
ICRA Limited	Moody's
India Ratings and Research Private Limited (India Ratings)	
Credit Analysis and Research Limited	
SME Rating Agency of India Limited	
Brickworks Ratings India Pvt Limited	

Rated facilities have generally been considered as those facilities where the Bank's exposure has been explicitly considered; else, the exposure has been treated by the Bank as unrated. The process used to transfer public issue ratings onto comparable assets in the banking book is in accordance with the requirements laid down by RBI.

Analysis of outstanding credit exposures (after considering credit mitigation) and credit risk by regulatory risk weight.

As at 31 March 2013

Nature and category of exposures	Total Gross Credit Exposure	Credit Risk Mitigation	Net Exposure (before provision)	Credit risk weight buckets summary			
				< 100%	100%	> 100%	Deduction from capital
Inter-bank exposures	23,737,894	–	23,737,894	23,737,894	–	–	–
Investments (HTM)	–	–	–	–	–	–	–
Advances	651,516,949	(14,182,865)	637,334,084	78,599,280	447,656,552	111,078,253	–
Total fund based exposures	675,254,843	(14,182,865)	661,071,978	102,337,174	447,656,552	111,078,253	–
Fx and derivative contracts	357,944,470	–	357,944,470	219,162,067	133,098,985	5,683,418	–
Guarantees, Acceptances, endorsements and other obligations	312,426,238	(3,123,526)	309,302,712	81,280,192	216,438,126	10,255,887	1,328,508
Undrawn Commitments and others	53,074,695	–	53,074,695	11,210,204	41,124,144	–	740,347
Total non fund based exposures	723,445,403	(3,123,526)	720,321,877	311,652,463	390,661,255	15,939,305	2,068,855



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As at 31 March 2012

(₹ in 000s)

Nature and category of exposures	Total Gross Credit Exposure	Credit Risk Mitigation	Net Exposure (before provision)	Credit risk weight buckets summary			
				< 100%	100%	> 100%	Deduction from capital
Inter-bank exposures	15,271,405	–	15,271,405	15,271,405	–	–	–
Investments (HTM)	–	–	–	–	–	–	–
Advances	583,960,332	(8,798,497)	575,161,835	101,526,307	407,223,244	66,412,284	–
Total fund based exposures	599,231,737	(8,798,497)	590,433,240	116,797,712	407,223,244	66,412,284	–
Fx and derivative contracts	570,181,922	–	570,181,922	462,708,718	106,853,499	619,705	–
Guarantees, Acceptances, endorsements and other obligations	280,491,942	(3,816,576)	276,675,366	97,434,092	171,835,151	6,077,615	1,328,508
Undrawn Commitments and others	41,692,366	–	41,692,366	3,275,754	37,675,042	1,223	740,347
Total non fund based exposures	892,366,230	(3,816,576)	888,549,654	563,418,564	316,363,692	6,698,543	2,068,855

Credit risk mitigation: Disclosures for standardised approaches

Potential credit losses from any given account, customer or portfolio are mitigated using a range of tools such as collateral, netting agreements, guarantees and restructuring. The reliance that can be placed on these mitigants is carefully assessed in light of issues such as legal certainty and enforceability, market valuation correlation and counterparty risk of the guarantor.

Risk mitigation policies determine the eligibility of collateral types. Collateral types for credit risk mitigation include cash; residential, commercial and industrial property; fixed assets such as motor vehicles, aircraft, plant and machinery; marketable securities; commodities; bank guarantees and letters of credit.

The above collateral types are applicable to all customer segments, including, corporates and financial institutions, though exposures to banks are generally non-collateralised. There are well laid down policies and processes for valuation/revaluation of collaterals, covering source of valuation, independent professional valuations, haircuts/margins on collateral market values, re-margining requirements and re-assessment of credit limits. However, from a local regulatory perspective, the main “eligible” collaterals under the SA are restricted to cash (including fixed deposits) and units of mutual funds. These are mainly collateral against retail loans.

Collateral is valued in accordance with the Bank’s risk mitigation policy, which prescribes the frequency of valuation for different collateral types. The valuation frequency is driven by the level of price volatility of each type of collateral and the nature of the underlying product or risk exposure. Collateral held against impaired loans is maintained at fair value, which is revalued at least annually as prescribed in risk mitigation policy and procedures. In case of stock and book debts, monthly statements are obtained from the clients. In case of marketable securities listed on recognised exchanges, the valuation frequency is daily.

Guarantees taken can be categorised as follows:

- Guarantee from a bank (including central banks), or surety bond which is repayable on demand.
- Guarantee from a related corporate (including government owned commercial enterprises).
- Guarantee from an unconnected corporate.
- Guarantee from a government department, or an entity classified as government risk (excluding those classified as banks or commercial enterprises).
- Guarantee or indemnity from a SCB Group entity (subsidiary/associate or branch).
- Guarantee from one or more individuals.

(₹ in 000s)

Nature and category of exposures	31.3.2013	31.3.2012
Exposure covered by eligible financial collateral after application of haircuts	47,534,545	30,199,352
Exposure covered by guarantees	19,312,520	9,067,203



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6.10. Securitisation: Disclosure for standardised approach

Securitisation transactions are generally undertaken with the objective of credit risk transfer, liquidity management, meeting regulatory requirements such as priority sector lending, and asset portfolio management. The Bank participates in securitisations in the role of originator, as well as, investor. In general, it provides credit enhancement services (as originator or as a third party), liquidity facilities, interest rate derivative products and acts as a service provider.

The key risks inherent in securitisation transactions include:

- Credit risk/market risk: risk arising on account of payment delinquencies from underlying obligors/borrowers in the assigned pool.
- Liquidity risk: risk arising on account of lack of secondary market to provide ready exit options to the investors/participants.
- Interest rate/currency risk: mark to market risks arising on account of interest rate/currency fluctuations.
- Prepayment risk: prepayments in the securitised pool results in early amortisation and loss of future interest to the investor on the prepaid amount.
- Co-mingling risk: risk arising on account of co-mingling of funds belonging to investor(s) with that of the originator and/or collection and processing servicer, when there exists a time lag between collecting amounts due from the obligors and payment made to the investors.

Monitoring credit risk

The Bank in the capacity of collection and processing agent prepares monthly performance reports which are circulated to investors/assignees/rating agencies. The securitised pools are continuously monitored and those requiring attention are subjected to specific interventions (e.g. focused collection efforts in affected geographies etc.) to improve their performance.

The risk assessment of the pools is done continuously by the rating agencies based on amortisation level, collection efficiency, credit enhancement utilisation levels and credit cover available for balance deal tenor.

The Bank has not used credit risk mitigants to mitigate retained risks.

The Bank provides credit enhancements in the form of cash deposits or guarantees in its securitisation transactions and also provides credit enhancement as a third party. The Bank makes appropriate provisions for any delinquency losses assessed at the time of sale as well as over the life of the securitisation transactions in accordance with the RBI guidelines.

Valuation

Pass Through Certificates (PTC) purchased have been marked to market on the basis of the Base Yield Curve and the applicable spreads as per the spread matrix relative to the Weighted Average Maturity of the paper as notified by Fixed Income Money Market and Derivative Association of India (FIMMDA).

Summary of the Bank's accounting policies for securitisation activities

Refer note 18(D)(3) of the financial statements.

Regulatory capital approach

As per the provisions of the Basel II framework, all banks have to mandatorily adopt SA for capital treatment of securitisation transactions. This approach requires use of external rating agencies for risk weighting securitisation exposures. The credit rating agencies used by the Bank for these types of exposures are those recognised by the RBI (refer section 6.9 above).

Quantitative Disclosures

6.10.1. Banking Book

- a) The outstanding exposures securitised by the Bank (in ₹ 000's) as on 31 March 2013: ₹ 6,033,207 (Previous Year: ₹ 3,625,171).
- b) Securitisation losses recognised by the Bank during 2012-13

(₹ in 000s)

Exposure Type	For the year ended 31.3.2013		For the year ended 31.3.2012	
	Underlying Security Outstanding	Losses	Underlying Security Outstanding	Losses
Corporate Loans	2,862,395	(82)	–	–

- c) Assets intended to be securitised within a year – NIL (Previous Year: NIL).

The securitisation transactions are undertaken on a need basis to meet the objectives as disclosed above.



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d) The total amount of exposures securitised with unrecognised gain / (loss) (₹ in 000s)

Exposure Type	31 March 2013		31 March 2012	
	Outstanding	Unrecognised gain / (loss)	Outstanding	Unrecognised gain / (loss)
Housing Loans	2,826,202	54,774	3,534,271	60,045
Corporate Loans	3,207,005	16	90,900	45

e) Securitisation exposures retained or purchased (₹ in 000s)

Exposure Type	31 March 2013		31 March 2012	
	On Balance Sheet	Off Balance Sheet	On Balance Sheet	Off Balance Sheet
Housing Loans	755,104	1,328,508	755,104	1,328,508
Vehicle Loans	–	100,000	–	–
	755,104	1,428,508	755,104	1,328,508

f) Aggregate amount of securitisation exposures retained or purchased and the associated capital charges

As at 31 March 2013 (₹ in 000s)

Exposure Type	<100% risk weight	100% risk weight	>100% risk weight	Total
Vehicle Loans	–	100,000	–	100,000
Capital Charge	–	9,000	–	9,000

As at 31 March 2012 – Nil

g) Securitisation exposures deducted from capital

As at 31 March 2013 (₹ in 000s)

Exposure Type	Exposures deducted entirely from Tier-1 capital	Credit enhancing I/Os deducted from total capital	Other exposures deducted from total capital
Housing Loans	–	–	2,083,612

As at 31 March 2012 (₹ in 000s)

Exposure Type	Exposures deducted entirely from Tier-1 capital	Credit enhancing I/Os deducted from total capital	Other exposures deducted from total capital
Housing Loans	–	–	2,083,612

6.10.2. Trading Book

a) There are no outstanding exposures securitised for which the Bank has retained any exposure which is subject to Market Risk.

b) Securitisation exposures retained or purchased – On Balance Sheet and Off Balance Sheet.

As at 31 March 2013 (₹ in 000s)

Exposure Type	On Balance Sheet	Off Balance Sheet
Vehicle Loans	25,487,593	–
SME Loans	4,419,672	–
Total	29,907,265	–

As at 31 March 2012 (₹ in 000s)

Exposure Type	On Balance Sheet	Off Balance Sheet
Vehicle Loans	20,103,014	–
SME Loans	5,436,505	–
Total	25,539,519	–



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c) Securitisation exposures retained or purchased

(₹ in 000s)

Risk Weight Bands	31 March 2013	31 March 2012
Exposures subject to Comprehensive Risk Measure for specific risk	29,907,265	25,539,519
Exposures subject to the securitisation framework for specific risk		
<100% risk weight	29,907,265	25,539,519
100% risk weight	–	–
>100% risk weight	–	–
Total	29,907,265	25,539,519

d) Aggregate amount of the capital requirements for the securitisation exposures

(₹ in 000s)

Risk Weight Bands	31 March 2013	31 March 2012
<100% risk weight	538,331	459,082
100% risk weight	–	–
>100% risk weight	–	–
Total	538,331	459,082

e) Securitisation exposures deducted from capital

As at 31 March 2013

(₹ in 000s)

Exposure Type	Exposures deducted entirely from Tier-1 capital	Credit enhancing I/Os deducted from total capital	Other exposures deducted from total capital
	–	–	–

As at 31 March 2012

(₹ in 000s)

Exposure Type	Exposures deducted entirely from Tier-1 capital	Credit enhancing I/Os deducted from total capital	Other exposures deducted from total capital
	–	–	–

7. Market Risk

The Bank recognises market risk as the potential for loss of earnings or economic value due to adverse changes in financial market rates or prices. The Bank is exposed to market risk arising principally from customer-driven transactions. The objective of the Bank's market risk policies and processes is to obtain a balance of risk and return while meeting customers' requirements.

The primary categories of market risk for the Bank are interest rate risk, currency exchange rate risk, commodity price risk and equity price risk.

7.1. Market Risk Governance

The GRC approves the Group's market risk appetite taking account of market volatility, the range of products and asset classes, business volumes and transaction sizes. The Group Market Risk Committee (GMRC), under authority delegated by the GRC, is responsible for setting VaR and stress loss triggers for market risk within the Group's risk appetite. The GMRC is also responsible for policies and other standards for the control of market risk and overseeing their effective implementation. These policies cover both trading and non-trading books. At a country level, there is an independent market risk function to implement Group market risk policies/limits and to monitor the market risk exposures in accordance with Group and local governance/regulatory norms.

Group Market Risk (GMR) approves the limits within delegated authorities and monitors exposures against these limits. Additional limits are placed on specific instruments and position concentrations, where appropriate. Sensitivity measures are used in addition to VaR as risk management tools. For example, interest rate sensitivity is measured in terms of exposure to a one basis point increase in yields, whereas, foreign exchange, commodity and equity sensitivities are measured in terms of the underlying values or amounts involved. Option risks are controlled through revaluation limits on underlying price and volatility shifts, limits on volatility risk and other variables that determine the options' value.

The CRC, in conjunction with GMR, provides market risk oversight, reporting and management of the market risk profile.



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Value at Risk

The Bank measures the risk of losses arising from future potential adverse movements in market rates, prices and volatilities using a VaR methodology. VaR, in general, is a quantitative measure of market risk that applies recent historical market conditions to estimate the potential future loss in market value that will not be exceeded in a set time period at a set statistical confidence level. VaR provides a consistent measure that can be applied across trading businesses and products over time and can be set against actual daily trading profit and loss outcome. VaR is calculated for expected movements over a minimum of one business day and to a confidence level of 97.5 per cent. This confidence level suggests that potential daily losses, in excess of the VaR measure, are likely to be experienced six times per year.

Back Testing

To assess their predictive power, VaR models are back tested against actual results. Back testing is conducted against clean profit and loss, which is the actual profit and loss for a given business day, adjusted to remove the effect of certain items unrelated to market risk.

Stress Testing

Losses beyond the confidence interval are not captured by a VaR calculation, which therefore gives no indication of the size of unexpected losses in these situations. GMR complements the VaR measurement by regularly stress testing market risk exposures to highlight potential risk that may arise from extreme market events that are rare but plausible.

Stress testing is an integral part of the market risk management framework and considers both, historical market events and forward looking scenarios. A consistent stress testing methodology is applied to trading and non-trading books. The stress testing methodology assumes that scope for management action would be limited during a stress event, reflecting the decrease in market liquidity that often occurs. Stress scenarios are regularly updated to reflect changes in risk profile and economic events.

Regular stress test scenarios are applied to interest rates, credit spreads, exchange rates and equity prices thereby covering asset classes in the Financial Markets (FM) non-trading and trading books. Ad hoc scenarios are also prepared, reflecting specific market conditions and for particular concentrations of risk that arise within the businesses.

7.2. Foreign Exchange Exposure

The foreign exchange exposures comprise trading and non-trading foreign currency translation exposures. Foreign exchange trading exposures are principally derived from customer driven transactions.

7.3. Interest Rate Exposure

The interest rate exposures arise from trading and non-trading activities. Structural interest rate risk arises from the differing repricing characteristics of commercial banking assets and liabilities.

7.4. Derivatives

Refer note 18(E)(3)(xxii)(b) of the financial statements for qualitative disclosures related to derivatives.

For quantitative details, refer “Minimum Regulatory Capital Requirements” under para 4.6 of this disclosure.

8. Interest Rate Risk in the Banking Book (IRRBB)

Interest rate risk from across the non-trading book portfolios is transferred to FM where it is managed by the local ALM desk under the supervision of ALCO. The ALM desk deals in the market in approved financial instruments in order to manage the net interest rate risk, subject to approved VaR and risk limits. VaR and stress tests are applied to non-trading book exposures in the same way as for the trading book.

The impact on market value of equity for a 200 basis upward move (in ₹ 000's) as at 31 March 2013 is ₹ 2,855,568 (previous year: ₹ 288,492).

9. Operational Risk

OR is the potential for loss arising from the failure of people, processes, technology or the impact of external events. It is the Bank's objective to minimise exposure to OR, subject to cost trade-offs. The Bank's exposure to OR arises as a consequence of its business activities. The Bank seeks to control operational risks to ensure that operational losses do not cause material damage to the franchise.

The Group OR Framework governs the management of OR. The Group Operational Risk Committee (GORC) oversees the management of OR across the Group, supported by business, functional and country-level committees. Group OR is responsible for setting and maintaining standards for OR management and measurement. Locally, this is managed by the CORC, which exercises oversight of the Bank's OR exposures to ensure that it is managed in a manner consistent with the RMF. All OR committees operate on the basis of a defined structure of delegated authorities and terms of reference, derived from the GRC.



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OR exposures are managed through a consistent set of management standards that drive risk identification, assessment, control and monitoring. These standards are challenged and revised regularly to ensure their ongoing effectiveness. The responsibility for daily management of OR exposures rests with business and function management as an integral component of their first line risk management responsibilities. In addition, specialist operational RCOs have responsibility for the management of OR arising from the following activities: legal processes, people management, technology management, vendor management, property management, security management, accounting and financial control, tax management, corporate authorities and structure and regulatory compliance. Each RCO is responsible for identifying risks that are material to the Group and for maintaining an effective control environment, which includes defining appropriate policies and procedures for approval by authorised risk committees.

Identified OR exposures are classified as 'Low', 'Medium', 'High' or 'Very High', in accordance with standard risk assessment criteria. Risks which are outside of set materiality thresholds receive a differential level of management attention and are reported to senior management and risk committees up to MANCO level.

The Bank uses the BIA consistent with the RBI's capital adequacy requirements to assess its regulatory capital requirements for OR. Under the BIA, a pre-determined beta co-efficient is applied to the average income for the previous three years, to determine the OR capital requirement.

10. Other Key Risks

10.1. Liquidity Risk

Liquidity risk is the potential that the Bank either does not have sufficient liquid financial resources available to meet all its obligations and commitments as they fall due, or can only access these financial resources at excessive cost.

The Liquidity Risk Framework governs liquidity risk and is managed by ALCO. In accordance with the framework, the Bank maintains a liquid portfolio of marketable securities as reserve assets. The level of the Bank's aggregate liquid reserves is in accordance with local regulatory minimum liquidity requirements.

10.2. Reputational Risk

Reputational risk is the potential for damage to the franchise, resulting in loss of earnings or adverse impact on market capitalisation as a result of stakeholders taking a negative view of the organisation or its actions.

The Reputational Risk Policy governs reputational risk and is managed by the MANCO through its sub-committees (CRC and CORC), with responsibility for protecting the Group's reputation locally to ensure that the Bank does not undertake any activities that may cause material damage to the Group's franchise.

Reputational risk is recorded and reviewed by the Country Head of Corporate Affairs, and key issues are flagged to the CRC and relevant business heads. Reputational risk is reported to the CEO through the CRC. Whilst the CRC covers all forms of reputational risk in country, business related reputational risks are also discussed and escalated to Group Communications Management team. Corporate Affairs representatives sit on CORC and CRC. Monthly reporting from Corporate Affairs to Group Communications Management team is in place to ensure that significant risks are duly escalated.

A fast track reporting process outside the normal reporting process is in place to respond to ad hoc issues or events which pose potential reputational risk to the Bank. The process involves alerting the appropriate level of the Bank and the Group promptly to give as much time as possible for steps to be taken to limit damage to its reputation.

11. Monitoring

Monitoring of risk management is achieved through independent reviews by RCO, GIA, Compliance, concurrent audits and spot checks by the external specialists as required under regulations.

To ensure the effectiveness of risk management processes in maintaining the risk profile of the Bank within risk appetite, the Bank maintains a three 'lines of defence' framework - refer para 5.1 above for further details.