Access Bank

Botswana Pillar III Disclosure

DECEMBER 2022

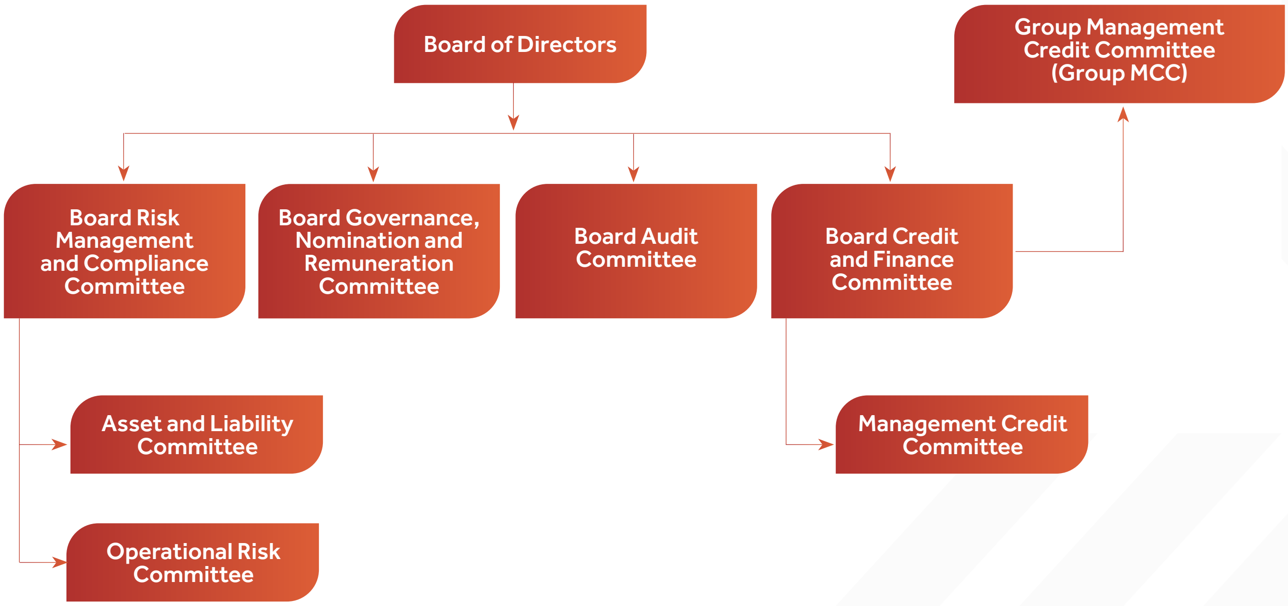

MORE
IN AFRICA
MORE TO THE WORLD
Africa
Asia
Europe
Middle East
access
more than banking

Objectives on risk management

The Group's activities expose it to a variety of financial risks and those activities involve the analysis, evaluation, acceptance and management of some degree of risk or combination of risks. Taking risk is core to the financial business, and operational risks are an inevitable consequence of being in business. The group's aim is therefore to achieve an appropriate balance between risk and return and minimise potential adverse effects on the group's financial performance.

The group's risk management policies are designed to identify and analyse these risks, to set appropriate risk limits and controls, and to monitor the risks and adherence to limits by means of reliable and up-to date information systems. The Group regularly reviews its risk management policies and systems to reflect changes in markets, products and emerging best practice.

Risk Management Structure



Market Risk

Market risk is the risk that changes in market prices such as interest rates, foreign exchange rates, equity prices, and general credit spreads will affect the fair value or future cash flows of a financial instrument; thus, impacting the banks income or value financial assets. The Bank takes on exposure to market risks, which arises from open positions in interest rate, currency and equity products, all of which are exposed to general and specific movements and /or changes in the level of volatility of market rates or prices.

Market Risk Weighted Assets

In assigning capital for market risk, the bank uses the standardized measurement method whereby the absolute value of the net open position is taken as the capital charge and a factor of 6.7 applied to come up with the respective risk weighted assets for market risk.

Summary Information	BWP "000"
Standardised Measurement method	**882**
Interest rate risk	-
Specific risk	-
General risk	-
Foreign exchange risk	**882**
Foreign exchange risk	882
Foreign exchange and gold	882
Total capital charge (Total of lines 2,7,12 and 16)	6.7
Risk-wighted amount factor	5 908
Market risk-weighted asserts	5 908
Market Risk Weighted Assets	**5,908**

Operational Risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. This definition includes legal risk but excludes strategic and reputational risk. Operational risk is prevalent in all of the Access Bank's activities, products, systems, people at all levels of the business and are taken into consideration in all business decisions. The bank has adopted the Basic Indicator Approach to operational risk management under Basel II as the foundation for its operational risk management framework. Operational risk is managed through the Operational Risk Management Framework.

Business Line Management has the direct responsibility for operational risk management in their respective units. Responsibilities include ensuring that all policies, procedures, limits and other risk control requirements are implemented and complied with as well as managing financial losses at desired levels. The rating recognizes the residual risk after considering controls in place to mitigate operational losses.
The Bank has operational risk management tools to help identify and monitor exposures across business. Key Risk Indicators (KRIs) form an integral part of an overall approach to managing risk. KRI have proven to be powerful tools for identifying, monitoring and anticipating occurrence of risk exposure in the bank. Key metrics together with thresholds are set and events are continuously monitored against the set thresholds. Additionally, Risk Control Self-Assessments (RCSAs) are performed at Business Unit level to assess inherent operational risks, the design and effectiveness of mitigating controls and help develop action plans to mitigate risks. All risk assessments results are validated from a second line of defence and reported to impacted stakeholders. Staff are encouraged to report operational risk incidents or events for identification of emerging risks and control lapses.

Identified material operational risk issues are discussed and monitored for closure at the monthly Operational Risk Management Committee (ORMC) meetings. Group Risk also have oversight of risk issues identified across the group network through the submission of the Monthly Operational Risk Management (ORM) report sent to Group. The Internal Auditors play a vital role in risk management by providing assurance of the effectiveness of the overall control environment through periodic reviews. Findings arising from internal audits are reported to all relevant management and governance bodies.

Business Continuity Management

Our customers are entitled to expect that we do everything possible to ensure minimum disruption to our operations and the delivery of services upon which they rely. To this end, Access Bank has a Business Continuity Management (BCM) programme with a set of interlocking plans and arrangements (the Business Continuity Management System - BCMS) that will ensure the organisation has a tried, tested and best practice response to significant disruptions. In the event of a major incident, priority will be placed upon the safety and welfare of our staff and visitors, above the restoration of critical business activities. Whilst the two are not mutually exclusive, management focus and resources will be diverted, where necessary, from business activity recovery to ensuring safety and welfare.

Operational Risk Weighted Assets

As previously indicated, the bank uses the Basic Indicator Approach (BIA) for assigning capital to operational risk; whereby the average revenue (net interest income plus non-interest income) over a three-year period for which revenue was positive is taken and multiplied by an operational risk factor of 0.15 to come up with the capital charge for operational risk. A risk weight factor of 6.7 associated with operational risk is then applied to come up with the associated risk weighted assets for operational risk.

Summary Information	Gross Income "000"	Agg'Gross Income (P'000)	Risk Weight Factor
Total Gross Income for Yr1	793 844		
Total Gross Income for Yr2	797 689		
Total Gross Income for Yr3	920 851		
Aggregate Gross Income (∑GI…n)		2 512 383	
Operational risk factor - denoted alpha (a)		0.15	
Aggregate Gross Income multiplied by a		376 857	
No. of years with Positive Gross Income (n)		3	
Operational Risk Capital Charge: BIA		125 619	
Risk weight factor			6.7
Operational risk weight assets			**841 648**

Credit risk

1.0 QUALITATIVE DISCLOSURES

1.1. Description of approaches – specific and general

The credit risk of a customer is assessed at each reporting period (month end) for each financial instrument to determine whether there is a significant increase in Credit Risk.

To make that assessment, the Bank compares the risk of a defaulting occurring on the financial instrument as at the reporting date with the risk of a default occurring on the financial instrument as at the date of initial recognition and consider reasonable and supportable information, that is available without undue cost or effort, that is indicative of significant increases in credit risk since initial recognition.

As per IFRS 9, accounts can be classified into three (3) stages being, Stage 1, Stage 2 and Stage 3.

Loans classified under stage 1 & 2 – General provisioning is taken on them while loans classified under stage 3 a specific provisioning is taken on them.

1.2. Statistical methods

- Credit risk is the risk that a counterparty (e.g. a borrower) will fail to perform according to the terms and conditions of the contract (i.e. default), thus causing the holder of the claim (e.g. a lender) to suffer a loss. For a loan, the risk to the lender includes lost principal and interest, delayed cash flows, and increased collection costs.
- Credit risk exist in most institutions, although more pronounced in lenders (banks) due to leverage.
- IAS39, IFRS9 and Basel III includes approaches/methods used to measure credit risk.
- Focus on three key concepts:
  - Exposure – What is my exposure to a counterparty at a particular point in time if a credit event occurred. This is known as the exposure at default ("EAD").
  - Default – What is the likelihood of a credit event occurring at a specific point in time. This is known as the probability of default ("PD").
  - Loss – If a credit event did occur, how much of the exposure would not be recovered, i.e. how much will be lost. This is known as the loss given default ("LGD").
- These three factors are used to calculate expected loss ("EL"): EL=EAD x PD x LGD.
  - This is a cost of the loan and needs to be included in the credit margin.

1.3 Portfolio specific considerations

- **Retail –** For Retail exposures, the assessment is made on a collective basis that incorporates all relevant credit information, including forward-looking macroeconomic information. For this purpose, the bank groups its exposures based on shared credit risk characteristics.

- **Corporate & SME** – For large exposures for SME & Corporate accounts, the assessment is driven by the internal credit rating of the exposure and a combination of forward-looking information that is specific to the individual borrower and forward-looking information on the macro economy, commercial sector and geographical region.

2. QUANTITATIVE DISCLOSURES

2.1 Total Gross Credit Exposures

Total exposure as per segment and non-performing per segment

Segment	Non Performing Loans "BWP'000"	Total Exposure "BWP'000"
Corporate	5,934	305,802
SME	52,861	98.546
Consumer	244,654	6,416,260
Total	**303,449**	**6,820,608**

2.2 Geographic Distribution

The geographic distribution of exposures broken down into 3 segments (Corporate, SME and Consumer).

Segment	Domestic	International	Total Exposure
Corporate	305,802	-	305,802
SME	98,546	-	98,546
Consumer	6,411,879	4,381	6,416,260
Total	**6,816,227**	**4,381**	**6,820,608**

99.9% of the Bank's loan book is held locally, with the remainder being from South Africa and Zimbabwe.

2.3 Total Credit Exposure by Sector

Segment	Total Exposure "BWP'000"
Business	140,544
Construction	737
Finance	250,264
Consumer	6,419,467
Real Estate	8,182
Trade	69
Transport	1,345
Total	**6,820,608**

2.4 Non-Performing by Sector

Segment	Total Exposure "BWP'000"
Business	9,772
Communication	1,802
Construction	1,740
Finance	664
Consumer	260,634
Manufacturing	9,836
Tourism	12,479
Trade	317
Transport	6,205
Total	**303,449**

Once a loan is 90 days in arrears or it is clear from the available information that the company will not be able to pay the debt for whatever reasons, it means that the loan is now a Non- Performing Loan and as such the unit that manages it also changes. A specialized unit which handles recovery of such debt by employing various aggressive strategies will start to manage the loan.

2.5 Loans by Products

Segment	Overdraft	Lease	Mortgage	Staff Loans	Term Loan
Corporate	5,613	252	0	0	299,937
SME	8.668	8,672	1,053	0	80,154
Consumer	22.090	5,175	504,784	286,098	5,598,113
Total	**36,371**	**14,098**	**505,837**	**286,098**	**5,978,204**

2.6 Loans by Maturity Profile

Maturity	Total Net Exposure
0 – 1 month	101.316
1 – 3 months	11,529
3 – 12 months	54.719
1 – 5 years	1.595,016
Over 5 years	4,855,614
Total	**6,618,194**

Remuneration and Nominations Committee (REMCO)

Access Bank Botswana is committed to creating, sustaining and maintaining a high- performance culture in accordance with the Bank's strategy of ensuring that the bank has the right people in the right roles at the right time. The Bank's remuneration policy sets out the purpose, framework, procedures and standards related to remuneration. Remuneration Committee (REMCO) is responsible to lead the process for Board appointments and to ensure that the Board and its committees have an appropriate balance of skills, experience, availability, independence and knowledge of the Company to enable them to discharge their respective responsibilities effectively.

The REMCO also advises the Board on developing remuneration policies that are aligned with the business strategy and objectives, risk appetite, values and long -term interests of the Company, recognizing the interests of all stakeholders. As part of their mandate, REMCO ensures that the remuneration policy covers the following objectives:

- Attract and retain high caliber staff.
- Assist in creating a high-performance culture, where consistent good or excellent performance is rewarded.
- Ensure that all employees are remunerated fairly.
- Compete for talent in an increasingly competitive labour market, through ensuring that remuneration compares satisfactorily with the market realities; and
- Motivate individual and team performance that creates stakeholder value for the organization.

The Bank participates in remuneration market surveys to ensure competitiveness and alignment to market movements and trends. The remuneration market data is used to determine salary reviews depending on the bank's affordability and the overall bank's performance.

In determining salary reviews, the following are considered:

- Bank's affordability/ ability to pay
- Market movements - internal and external benchmarking
- Individual and unit's performance
- Bank's bonus provisions

Remuneration of Risk and Compliance staff is part of the general Bank's remuneration policy and they have agreed Cost to Company (CTC) remuneration at the time of employment. Any additional variable pay in the form of Annual Cash Incentives or Long -term incentives is based on individual performance against set targets.

The Bank has a guaranteed 13th cheque for eligible staff. A total amounting to BWP 9,078,484.27 was made for severance and guaranteed 13th cheque for eligible staff in 2022.

Performance Management

The Bank's performance Management Policy aims to promote the achievement of Access Bank Botswana 's objectives through the effective management of employee performance.

All employees are expected to perform their duties in a competent and efficient manner in line with their respective employment contractual requirements; inherent duties and responsibilities of the position; organizational requirements, policies and processes; legislative requirements and acceptable standards with reference to quality, timelines, attitude and behavior; and key performance contract indicators (KPI's) or outcomes.

As a high-performance driven organization, staff contracts are reviewed on a regular basis with agreed Key Performance Indicators ("KPI's") with the organization. The main purpose of the Performance Assessment and Appraisal Process is to determine whether the agreed KPIs have been reached, and if reached; the remuneration will be reviewed, and staff member awarded accordingly.

All business heads / senior management are considered to be risk takers. They have a responsibility to identify, measure, monitor and report risks inherent in their units and are responsible for implementing board approved policies and ensuring their staff understand and implement risk mitigating strategies. There are 14 Members of senior management, who are part of the total staff compliment of 423.

Quantitative information about employees' exposure to implicit (e.g., Fluctuations in the value of shares or performance units) and explicit adjustments (e.g., malus, claw backs or similar reversals or downward revaluations of awards) of deferred remuneration and retained remuneration: None

Senior Management Compensation YTD 2022

(8B) SENIOR MANAGEMENT COMPENSATION	Local 000'	Expatriates 000'	Total 000'
Salaries and other short term employee benefits	21 744	540	22 284
Post-employment benefits	2 369	3	2 372
Termination benefits	418	-	418
Total	**24,532**	**543**	**25,074**

Table 22 (a)
Basel III Common Equity Tier I Disclosure Template (With Transitional Adjustments)

Common Equity Tier I capital: instruments and reserves		
1	Directly issued qualifying common share (and equivalent for non-joint stock companies) capital plus related stock surplus.	222,479
2	Retained earnings	791,329
3	Accumulated other comprehensive income (and other reserves)	14,692
4	Directly issued capital subject to phase out from CET1 CAPITAL (only applicable to non-joint stock companies)	-
5	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1 CAPITAL)	-
6	Common Equity Tier I capital before regulatory adjustments	1,028,500
Common Equity Tier I capital: regulatory adjustments		
7	Prudential valuation adjustments	-
8	Goodwill (net of related tax liability)	-
9	Other intangibles other than mortgage-servicing rights (net of related tax liability)	(76,172)
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)	-
11	Cash-flow hedge reserve	-
12	Shortfall of provisions to expected losses	-
13	Securitisation gain on sale (as set out in paragraph 562 of Basel II framework)	-
14	Gains and losses due to changes in own credit risk on fair valued liabilities	-
15	Defined-benefit pension fund net assets	-
16	Investments in own shares (if not already netted off paid-in capital on reported balance sheet)	-
17	Reciprocal cross-holdings in common equity	-
18	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued share capital (amount above 10% threshold)	-
19	Significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions (amount above 10% threshold)	-
20	Mortgage servicing rights (amount above 10% threshold)	-
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability)	-
22	Amount exceeding the 15% threshold	-
23	of which: significant investments in the common stock of financials	-
24	of which: mortgage servicing rights	-
25	of which: deferred tax assets arising from temporary differences	-
26	National specific regulatory adjustments	-
27	Regulatory adjustments applied to Common Equity Tier I due to insufficient Additional Tier I and Tier II to cover deductions	-
28	Total regulatory adjustments to Common equity Tier I	(76,172)
29	Common Equity Tier I capital (CET1 CAPITAL)	952,328
Additional Tier I capital: instruments		
30	Directly issued qualifying Additional Tier I instruments plus related stock surplus	-
31	of which: classified as equity under applicable accounting standards	-
32	of which: classified as liabilities under applicable accounting standards	-
33	Directly issued capital instruments subject to phase out from Additional Tier I	-
34	Additional Tier I instruments (and CET1 CAPITAL 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 I capital before regulatory adjustments	
Additional Tier I capital: regulatory adjustments		
37	Investments in own Additional Tier I instruments	-
38	Reciprocal cross-holdings in Additional Tier I instruments	-

39	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above 10% threshold)	-
40	Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)	-
41	National specific regulatory adjustments	-
42	Regulatory adjustments applied to Additional Tier I due to insufficient Tier II to cover deductions	-
43	Total regulatory adjustments to Additional Tier I capital	-
44	Additional Tier I capital (AT1)	-
45	Tier I capital (T1 = CET1 CAPITAL + AT1)	952,328
Tier II capital: instruments and provisions		
46	Directly issued qualifying Tier II instruments plus related stock surplus	427,551
47	Directly issued capital instruments subject to phase out from Tier II	-
48	Tier II instruments (and CET1 CAPITAL and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier II)	-
49	of which: instruments issued by subsidiaries subject to phase out	-
50	Provisions	68,805
51	Tier II capital before regulatory adjustments	496,356
Tier II capital: regulatory adjustments		
52	Investments in own Tier II instruments	-
53	Reciprocal cross-holdings in Tier II 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	-
57	Total regulatory adjustments to Tier II capital	-
58	Tier II capital (T2)	496,356
59	Total capital (TC = T1 + T2)	1,448,684
60	Total risk-weighted assets	6,923,493
Capital ratios and buffers		
61	Common Equity Tier I (as a percentage of risk weighted assets)	13.8%
62	Tier I (as a percentage of risk-weighted assets)	13.8%
63	Total capital (as a percentage of risk weighted assets)	20.9%
64	Institution specific buffer requirement (minimum CET1 CAPITAL requirement plus capital conservation buffer plus countercyclical buffer requirements plus G-SIB buffer requirement, expressed as a percentage of risk weighted assets)	7.0%
65	of which: capital conservation buffer requirement	2.5%
66	of which: bank specific countercyclical buffer requirement	-
67	of which: G-SIB buffer requirement	-
68		
Common Equity Tier I available to meet buffers (as a percentage of risk weighted assets)		
National minima (if different from Basel III)	National Common Equity Tier I minimum ratio (if different from Basel III minimum)	4.5%
70	National Tier I minimum ratio (if different from Basel III minimum)	
71	National total capital minimum ratio (if different from Basel III minimum)	12.5%
Amounts below the thresholds for deduction (before risk-weighting)		
72	Non-significant investments in the capital of other financials	
73	Significant investments in the common stock of financials	
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 II		
76	Provisions eligible for inclusion in Tier II in respect of exposures subject to standardised approach (prior to application of cap)	Provisions
77	Cap on inclusion of provisions in Tier II under standardised approach	-
78	Provisions eligible for inclusion in Tier II in respect of exposures subject to internal ratings-based approach (prior to application of cap)	-
79	Cap for inclusion of provisions in Tier II under internal ratings-based approach	-
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2015 and 1 Jan 2020)		
80	Current cap on CET1 CAPITAL instruments subject to phase out arrangements	-
81	Amount excluded from CET1 CAPITAL 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)	-

Table 22 (b)
Basel III Common Equity Tier I Disclosure Template (Fully Loaded)

Common Equity Tier I capital: instruments and reserves		
1	Directly issued qualifying common share (and equivalent for non-joint stock companies) capital plus related stock surplus.	222,479
2	Retained earnings	791,329
3	Accumulated other comprehensive income (and other reserves)	14,692
4	Directly issued capital subject to phase out from CET1 CAPITAL (only applicable to non-joint stock companies)	-
5	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1 CAPITAL)	-
6	Common Equity Tier I capital before regulatory adjustments	1,028,500
Common Equity Tier I capital: regulatory adjustments		
7	Prudential valuation adjustments	-
8	Goodwill (net of related tax liability)	-
9	Other intangibles other than mortgage-servicing rights (net of related tax liability)	(76,172)
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)	-
11	Cash-flow hedge reserve	-
12	Shortfall of provisions to expected losses	-
13	Securitisation gain on sale (as set out in paragraph 562 of Basel II framework)	-
14	Gains and losses due to changes in own credit risk on fair valued liabilities	-
15	Defined-benefit pension fund net assets	-
16	Investments in own shares (if not already netted off paid-in capital on reported balance sheet)	-
17	Reciprocal cross-holdings in common equity	-
18	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued share capital (amount above 10% threshold)	-
19	Significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions (amount above 10% threshold)	-
20	Mortgage servicing rights (amount above 10% threshold)	-
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability)	-
22	Amount exceeding the 15% threshold	-
23	of which: significant investments in the common stock of financials	-
24	of which: mortgage servicing rights	-
25	of which: deferred tax assets arising from temporary differences	-

26	National specific regulatory adjustments	-
27	Regulatory adjustments applied to Common Equity Tier I due to insufficient Additional Tier I and Tier II to cover deductions	-
28	Total regulatory adjustments to Common equity Tier I	(76,172)
29	Common Equity Tier I capital (CET1 CAPITAL)	952,328
Additional Tier I capital: instruments		
30	Directly issued qualifying Additional Tier I instruments plus related stock surplus	-
31	of which: classified as equity under applicable accounting standards	-
32	of which: classified as liabilities under applicable accounting standards	-
33	Directly issued capital instruments subject to phase out from Additional Tier I	-
34	Additional Tier I instruments (and CET1 CAPITAL 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 I capital before regulatory adjustments	-
Additional Tier I capital: regulatory adjustments		
37	Investments in own Additional Tier I instruments	-
38	Reciprocal cross-holdings in Additional Tier I instruments	-
39	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above 10% threshold)	-
40	Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)	-
41	National specific regulatory adjustments	-
42	Regulatory adjustments applied to Additional Tier I due to insufficient Tier II to cover deductions	-
43	Total regulatory adjustments to Additional Tier I capital	-
44	Additional Tier I capital (AT1)	-
45	Tier I capital (T1 = CET1 CAPITAL + AT1)	952,328
Tier II capital: instruments and provisions		
46	Directly issued qualifying Tier II instruments plus related stock surplus	427,551
47	Directly issued capital instruments subject to phase out from Tier II	-
48	Tier II instruments (and CET1 CAPITAL and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier II)	-
49	of which: instruments issued by subsidiaries subject to phase out	-
50	Provisions	68,805
51	Tier II capital before regulatory adjustments	496,356
Tier II capital: regulatory adjustments		
52	Investments in own Tier II instruments	-
53	Reciprocal cross-holdings in Tier II 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	-
57	Total regulatory adjustments to Tier II capital	-
58	Tier II capital (T2)	496,356
59	Total capital (TC = T1 + T2)	1,448,684
60	Total risk-weighted assets	6,923,493

Capital ratios and buffers		
61	Common Equity Tier I (as a percentage of risk weighted assets)	13.8%
62	Tier I (as a percentage of risk-weighted assets)	13.8%
63	Total capital (as a percentage of risk weighted assets)	20.9%
64	Institution specific buffer requirement (minimum CET1 CAPITAL requirement plus capital conservation buffer plus countercyclical buffer requirements plus G-SIB buffer requirement, expressed as a percentage of risk weighted assets)	7.0%
65	of which: capital conservation buffer requirement	2.5%
66	of which: bank specific countercyclical buffer requirement	-
67	of which: G-SIB buffer requirement	-
68		-
Common Equity Tier I available to meet buffers (as a percentage of risk weighted assets)		
National minima (if different from Basel III)	National Common Equity Tier I minimum ratio (if different from Basel III minimum)	4.5%
70	National Tier I minimum ratio (if different from Basel III minimum)	-
71	National total capital minimum ratio (if different from Basel III minimum)	12.5%
Amounts below the thresholds for deduction (before risk-weighting)		
72	Non-significant investments in the capital of other financials	-
73	Significant investments in the common stock of financials	-
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 II		
76	Provisions eligible for inclusion in Tier II in respect of exposures subject to standardised approach (prior to application of cap)	68,805
77	Cap on inclusion of provisions in Tier II under standardised approach	-
78	Provisions eligible for inclusion in Tier II in respect of exposures subject to internal ratings-based approach (prior to application of cap)	-
79	Cap for inclusion of provisions in Tier II under internal ratings-based approach	-
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2015 and 1 Jan 2020)		
80	Current cap on CET1 CAPITAL instruments subject to phase out arrangements	-
81	Amount excluded from CET1 CAPITAL 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)	-

Table 22 (c): Transitional Disclosures

		a	b	c	d	e
		Dec-22	Sep-22	Jun-22	Mar-22	Dec-21
	Available capital (P'000)					
1	Common Equity Tier 1 (CET1)	1,028,500	1,065,737	1,055,497	1,190,619	1,186,136
1a	Fully loaded ECL accounting model	1,028,500	1,065,737	1,055,497	1,190,619	1,186,136
2	Tier 1	952,328	983,213	948,801	1,110,509	1,110,509
2a	Fully loaded ECL accounting model Tier 1	952,328	983,213	948,801	1,110,509	1,110,509
3	Total capital	1,448,684	1,325,907	1,282,362	1,437,201	1,437,201
3a	Fully loaded ECL accounting model total capital	1,448,684	1,325,907	1,282,362	1,437,201	1,437,201
	Risk-weighted assets (P'000)					
4	Total risk-weighted assets (RWA)	6,923,493	6,783,003	6,379,120	6,799,911	6,747,554
	Risk-based capital ratios as a percentage of RWA (%)					
5	Common Equity Tier 1 ratio	14.9%	15.7%	16.5%	17.5%	17.6%
5a	Fully loaded ECL accounting model Common Equity Tier 1	14.9%	15.7%	16.5%	17.5%	17.6%
6	Tier 1 ratio	13.8%	14.5%	14.9%	16.2%	16.5%
6a	Fully loaded ECL accounting model Common Equity Tier 1	13.8%	14.5%	14.9%	16.2%	16.5%
7	Total capital ratio	20.9%	19.5%	20.1%	20.9%	21.3%
7a	Fully loaded ECL accounting model total capital ratio	20.9%	19.5%	20.1%	20.9%	21.3%
Additional CET1 buffer requirements as a percentage of RWA						
8	Capital conservation buffer requirements (2.5% from 2019) (%)	173,087	169,575	159,478	169,998	168,689

Qualitative Disclosures	(a)	Access Bank Botswana Limited
	(b)	An outline of the difference in the basis of consolidation for accounting and regulatory purposes, within the group (a) that are fully consolidated. (b) that are pro-rata consolidated; (c) that are given a deduction treatment, and (d) equity accounted.
	(c)	Any restrictions, or other major impediments, on the transfer of funds or regulatory capital within the group.
Quantitative Disclosures	(d)	The aggregate amount of capital deficiencies in all subsidiaries, that are not included in the consolidation for regulatory purposes (i.e., that are deducted) and the name (s) of such subsidiaries.
	(e)	The aggregate amounts (e.g., current book value) of a bank's total interests insurance entities, which are risk-weighted, rather than deducted from capital, as well as their names, their country of incorporation or residence, the proportion of ownership interest and, if different, the proportion of voting power in these entities.

Explanation of each row of the common disclosure Row number		
1	Instruments issued by the parent company of the reporting group that meet all of the CET1 CAPITAL entry criteria set out in the Directive. This should be equal to the sum of common stock (and related surplus only) and other instruments for non-joint stock companies, both of which must meet the common stock criteria. This should be net of treasury stock and other investments in own shares to the extent that these are already derecognised on the balance sheet under the relevant accounting standards. Other paid-in capital elements must be excluded. All minority interest must be excluded.	222,479
2	Retained earnings, prior to all regulatory adjustments. In accordance with the Directive, this row should include interim profit and loss that has met any audit, verification or review procedures that the Bank has put in place. Dividends are to be removed in accordance with the applicable accounting standards, i.e. they should be removed from this row when they are removed from the balance sheet of the bank.	791,329
3	Accumulated other comprehensive income and other disclosed reserves, prior to all regulatory adjustments.	14,692
4	Directly issued capital instruments subject to phase-out from CET1 CAPITAL in accordance with the requirements of the Directive. This is only applicable to non-joint stock companies. Banks structured as joint-stock companies must report zero in this row.	-
5	Common share capital issued by subsidiaries and held by third parties. Only the amount that is eligible for inclusion in group CET1 CAPITAL should be reported here, as determined by the application of the Directive.	-
6	Sum of rows 1 to 5.	1,028,500
7	Prudential valuation adjustments according to the Directive.	-
8	Goodwill net of related tax liability, as set out in the Directive.	-
9	Other intangibles other than mortgage-servicing rights (net of related tax liability), as set out in the Directive.	(76,172)
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability), as set out in the Directive.	-
11	The element of the cash-flow hedge reserve described in the Directive.	-
12	Shortfall of provisions to expected losses as described in the Directive.	-
13	Securitisation gain on sale (as set out in paragraph 562 of Basel II framework)	-
14	Gains and losses due to changes in own credit risk on fair valued liabilities, as described in the Directive.	-
15	Defined-benefit pension fund net assets, the amount to be deducted as set out in the Directive.	-
16	Investments in own shares (if not already netted off paid-in capital on reported balance sheet), as set out in the Directive.	-
17	Reciprocal cross-holdings in common equity, as set out in the Directive.	-
18	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation where the bank does not own more than 10% of the issued share capital (amount above 10% threshold), amount to be deducted from CET1 CAPITAL in accordance with the Directive.	-
19	Significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation (amount above 10% threshold), amount to be deducted from CET1 CAPITAL in accordance with the Directive.	-
20	Mortgage servicing rights (amount above 10% threshold), amount to be deducted from CET1 CAPITAL in accordance with the Directive.	-
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability), amount to be deducted from CET1 CAPITAL in accordance with the Directive.	-
22	Total amount by which the 3 threshold items exceed the 15% threshold, excluding amounts reported in rows 19 to 21, calculated in accordance with the Directive.	-
23	The amount reported in row 22 that relates to significant investments in the common stock of financials	-
24	The amount reported in row 22 that relates to mortgage servicing rights.	-
25	The amount reported in row 22 that relates to deferred tax assets arising from temporary differences.	-
26	Any specific regulatory adjustments that the Bank required to be applied to CET1 CAPITAL in addition to the Basel III minimum set of adjustments. Guidance should be sought from the Bank.	-
27	Regulatory adjustments applied to Common Equity Tier I due to insufficient Additional Tier I to cover deductions. If the amount reported in row 43 exceeds the amount reported in row 36 the excess is to be reported here.	-
28	Total regulatory adjustments to Common equity Tier I, to be calculated as the sum of rows 7 to 22 plus rows 26 and 27.	(76,172)
29	Common Equity Tier I capital (CET1 CAPITAL), to be calculated as row 6 minus row 28.	952,328

30	Instruments issued by the parent company of the reporting group that meet all of the AT1 entry criteria set out in the Directive and any related stock surplus as set out in the Directive. All instruments issued by subsidiaries of the consolidated group should be excluded from this row. This row may include Additional Tier I capital issued by an SPV of the parent company only if it meets the requirements set out in the Directive.	-
31	The amount in row 30 classified as equity under applicable accounting standards.	-
32	The amount in row 30 classified as liabilities under applicable accounting standards.	-
33	Directly issued capital instruments subject to phase out from Additional Tier I in accordance with the requirements of the Directive.	-
34	Additional Tier I instruments (and CET CAPITAL instruments not included in row 5) issued by subsidiaries and held by third parties, the amount allowed in group AT1 in accordance with the Directive.	-
35	The amount reported in row 34 that relates to instruments subject to phase out from AT1 in accordance with the Directive.	-
36	The sum of rows 30, 33 and 34.	-
37	Investments in own Additional Tier I instruments, amount to be deducted from AT1 in accordance with the Directive.	-
38	Reciprocal cross-holdings in Additional Tier I instruments, amount to be deducted from AT1 in accordance with the Directive.	-
39	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation where the bank does not own more than 10% of the issued common share capital of the entity (net of eligible short positions), amount to be deducted from AT1 in accordance with the Directive.	-
40	Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions), amount to be deducted from AT1 in accordance with the Directive..	-
41	Any specific regulatory adjustments that the Bank require to be applied to AT1 in addition to the Basel III minimum set of adjustments. Guidance should be sought from the Bank.	-
42	Regulatory adjustments applied to Additional Tier I due to insufficient Tier II to cover deductions. If the amount reported in row 57 exceeds the amount reported in row 51 the excess is to be reported here.	-
43	The sum of rows 37 to 42.	-
44	Additional Tier I capital, to be calculated as row 36 minus row 43.	-
45	Tier I capital, to be calculated as row 29 plus row 44.	952,328
46	Instruments issued by the parent company of the reporting group that meet all of the Tier II entry criteria set out in the Directive and any related stock surplus as set out in the Directive. All instruments issued of subsidiaries of the consolidated group should be excluded from this row. This row may include Tier II capital issued by an SPV of the parent company only if it meets the requirements set out in the Directive.	427,551
47	Directly issued capital instruments subject to phase out from Tier II in accordance with the Directive.	-
48	Tier II instruments (and CET1 CAPITAL and AT1 instruments not included in rows 5 or 32) issued by subsidiaries and held by third parties (amount allowed in group Tier II), in accordance with the Directive.	-
49	The amount reported in row 48 that relates to instruments subject to phase out from T2 in accordance with the Directive.	-
50	Provisions included in Tier II, calculated in accordance with the Directive.	68,805
51	The sum of rows 46 to 48 and row 50.	496,356
52	Investments in own Tier II instruments, amount to be deducted from Tier II in accordance with the Directive.	-
53	Reciprocal cross-holdings in Tier II instruments, amount to be deducted from Tier II in accordance with the Directive.	-
54	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation where the bank does not own more than 10% of the issued common share capital of the entity (net of eligible short positions), amount to be deducted from Tier II in accordance with the Directive.	-
55	Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions), amount to be deducted from Tier II in accordance with the Directive.	-
56	Any specific regulatory adjustments that the bank requires to be applied to Tier II in addition to the Basel III minimum set of adjustments. Guidance should be sought from the Bank.	-
57	The sum of rows 52 to 56.	-
58	Tier II capital, to be calculated as row 51 minus row 57.	496,356
59	Total capital, to be calculated as row 45 plus row 58.	1,448,686
60	Total risk weighted assets of the reporting group.	6,923,493

61	Common Equity Tier I (as a percentage of risk weighted assets), to be calculated as row 29 divided by row 60 (expressed as a percentage).	13.8%
62	Tier I ratio (as a percentage of risk weighted assets), to be calculated as row 45 divided by row 60 (expressed as a percentage).	13.8%
63	Total capital ratio (as a percentage of risk weighted assets), to be calculated as row 59 divided by row 60 (expressed as a percentage).	20.9%
64	Institution specific buffer requirement (minimum CET1 CAPITAL requirement plus capital conservation buffer plus countercyclical buffer requirements plus G-SIB buffer requirement, expressed as a percentage of risk weighted assets). To be calculated as 4.5% plus 2.5% plus the bank specific countercyclical buffer requirement calculated in accordance with paragraphs 142 to 145 of Basel III plus the bank G-SIB requirement (where applicable) as set out in Global systemically important banks: assessment methodology and the additional loss absorbency requirement: Rules text (November 2011). This row will show the CET1 CAPITAL ratio below which the bank will become subject to constraints on distributions.	-
65	The amount in row 64 (expressed as a percentage of risk weighed assets) that relates to the capital conservation buffer), ie banks will report 2.5% here.	-
66	The amount in row 64 (expressed as a percentage of risk weighed assets) that relates to the bank specific countercyclical buffer requirement.	-
67	The amount in row 64 (expressed as a percentage of risk weighed assets) that relates to the bank's G-SIB requirement.	-
68	Common Equity Tier I available to meet buffers (as a percentage of risk weighted assets). To be calculated as the CET1 CAPITAL ratio of the bank, less any common equity used to meet the bank's Tier I and Total capital requirements.	-
69	Common Equity Tier I minimum ratio as per the Directive.	-
70	Tier I minimum ratio as per the Directive.	-
71	Total capital minimum ratio as per the Directive.	-
72	Non-significant investments in the capital of other financials, the total amount of such holdings that are not reported in row 18, row 39 and row 54.	-
73	Significant investments in the common stock of financials, the total amount of such holdings that are not reported in row 19 and row 23.	-
74	Mortgage servicing rights, the total amount of such holdings that are not reported in row 20 and row 24.	-
75	Deferred tax assets arising from temporary differences, the total amount of such holdings that are not reported in row 21 and row 25.	-
76	Provisions eligible for inclusion in Tier II in respect of exposures subject to standardised approach, calculated in accordance with the Directive, prior to the application of the cap.	-
77	Cap on inclusion of provisions in Tier II under standardised approach, calculated in accordance with the Directive of Basel III.	-
78	Provisions eligible for inclusion in Tier II in respect of exposures subject to internal ratings-based approach, calculated in accordance paragraph 61 of Basel III, prior to the application of the cap.	-
79	Cap for inclusion of provisions in Tier II under internal ratings-based approach, calculated in accordance paragraph 61 of Basel III.	-
80	Current cap on CET1 CAPITAL instruments subject to phase out arrangements as per the Directive.	-
81	Amount excluded from CET1 CAPITAL due to cap (excess over cap after redemptions and maturities).	-
82	Current cap on AT1 instruments subject to phase out arrangements in accordance with the Directive.	-
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities) as per the Directive.	-
84	Current cap on T2 instruments subject to phase out arrangements, as per the Directive.	-
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities), as per the Directive.	-

	BALANCE SHEET AS IN PUBLISHED FINANCIAL STATEMENTS AS AT PERIOD END 31 DECEMBER 2022	UNDER REGULATORY SCOPE OF CONSOLIDATION AS AT PERIOD END 31 DECEMBER 2022
Assets		
Cash and balances at central banks	217,678	217,678
Items in the course of collection from other banks	397,736	397,735
Trading portfolio assets	-	-
Financial assets designated at fair value	876,333	876,333
Derivative financial instruments	20,838	20,838
Loans and advances to banks	823,011	823,012
Loans and advances to customers	6,618,195	6,618,195
Reverse repurchase agreements and other similar secured lending	-	-
Available for sale financial investments	-	-
Current and deferred tax assets	2,666	2,666
Prepayments, accrued income and other assets	119,730	119,730
Investments in associates and joint ventures	-	-
Goodwill and intangible assets of which other intangibles (excluding MSRs)	76,172	76,172
Property, plant and equipment	158,516	158,516
Total assets	**9,310,875**	**9,310,875**
Liabilities		
Deposits from banks	191,565	191,565
Items in the course of collection due to other banks	6,097	6,007
Customer accounts	7,276,718	7,276,718
Borrowed funds	618,021	190,470
Trading portfolio liabilities	-	-
Financial liabilities designated at fair value	5,196	5,196
Derivative financial instruments	20,302	20,302
Debt securities in issue	-	-
Accruals, deferred income and other liabilities	164,467	125,773
Current and deferred tax liabilities	-	-
Of which DTLs related to goodwill	-	-
Of which DTLs related to intangible assets	-	-
(excluding MSRs)	-	-
Of which DTLs related to MSRs	-	-
Subordinated liabilities (Tier II borrowings)		427,551
Provisions	-	38,964
Retirement benefit liabilities	-	-
Total liabilities	**8,282,366**	**8,282,365**
Shareholders' Equity		
Paid-in share capital	222,479	222,479
Retained earnings	791,330	791,329
Accumulated other comprehensive income	14,700	14,692
Total shareholders' equity	**1,028,509**	**1,028,500**

Common Equity Tier I capital: instruments and reserves			
		Component of regulatory capital reported by bank	Source based on Reference numbers/letters of the balance sheet under the regulatory scope of consolidation from step 2.
1	Directly issued qualifying common share (and equivalent for non-joint stock companies) capital plus related stock surplus.	222,479	
2	Retained earnings	791,329	
3	Accumulated other comprehensive income (and other reserves)	14,692	
6	**Common Equity Tier I capital before regulatory adjustments**	1,028,500	

1	Issuer	PROPARCO
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	OFSL
3	Governing law(s) of the instrument	Botswana
	Regulatory treatment	Tier II capital instrument
4	Transitional Basel III rules	Not Applicable
5	Post-transitional Basel III rules	Not Applicable
6	Eligible at solo/group/group and solo	Solo
7	Instrument type (types to be specified by each jurisdiction)	Loan
8	Amount recognised in regulatory capital (Currency in mil, as of most recent reporting date)	BWP127
9	Par value of instrument	BWP 100
10	Accounting classification	Borrowings
11	Original date of issuance	15/Oct/2020
12	Perpetual or dated	10 Years
13	Original maturity date	15/Oct/2030
14	Issuer call subject to prior supervisory approval	Callable after % years at the instance of the Issuer
15	Optional call date, contingent call dates and redemption amount	-
16	Subsequent call dates, if applicable	Not Applicable
	Coupons / dividends	Coupons paid semi-annually
17	Fixed or floating dividend/coupon	Floating rate
18	Coupon rate and any related index	11.34%
19	Existence of a dividend stopper	None
20	Fully discretionary, partially discretionary or mandatory	Mandatory
21	Existence of step up or other incentive to redeem	Not Applicable
22	Noncumulative or cumulative	Not Applicable
23	Convertible or non-convertible	Not Applicable
24	If convertible, conversion trigger (s)	Not Applicable
25	If convertible, fully or partially	Not Applicable
26	If convertible, conversion rate	Not Applicable
27	If convertible, mandatory or optional conversion	Not Applicable
28	If convertible, specify instrument type convertible into	Not Applicable
29	If convertible, specify issuer of instrument it converts into	Not Applicable
30	Write-down feature	Not Applicable
31	If write-down, write-down trigger(s)	Not Applicable
32	If write-down, full or partial	Not Applicable
33	If write-down, permanent or temporary	Not Applicable
34	If temporary write-down, description of write-up mechanism	Not Applicable
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Surbodinated to claims of General Creditors and claims of Depositors
36	Non-compliant transitioned features	Not Applicable
37	If yes, specify non-compliant features	Not Applicable

1	Issuer	Botswana Development Corporation
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	71000001
3	Governing law(s) of the instrument	Botswana
	Regulatory treatment	Borrowings
4	Transitional Basel III rules	Not Applicable
5	Post-transitional Basel III rules	Not Applicable
6	Eligible at solo/group/group and solo	Solo
7	Instrument type (types to be specified by each jurisdiction)	Loan
8	Amount recognised in regulatory capital (Currency in mil, as of most recent reporting date)	BWP 150
9	Par value of instrument	BWP 150
10	Accounting classification	Borrowings
11	Original date of issuance	23/Dec/2018
12	Perpetual or dated	10 Years
13	Original maturity date	3/Aug/2028
14	Issuer call subject to prior supervisory approval	Not Applicable
15	Optional call date, contingent call dates and redemption amount	-
16	Subsequent call dates, if applicable	Not Applicable
	Coupons / dividends	Coupons paid auterly
17	Fixed or floating dividend/coupon	Floating rate
18	Coupon rate and any related index	8.75%
19	Existence of a dividend stopper	None
20	Fully discretionary, partially discretionary or mandatory	Mandatory
21	Existence of step up or other incentive to redeem	Not Applicable
22	Noncumulative or cumulative	Not Applicable
23	Convertible or non-convertible	Not Applicable
24	If convertible, conversion trigger (s)	Not Applicable
25	If convertible, fully or partially	Not Applicable
26	If convertible, conversion rate	Not Applicable
27	If convertible, mandatory or optional conversion	Not Applicable
28	If convertible, specify instrument type convertible into	Not Applicable
29	If convertible, specify issuer of instrument it converts into	Not Applicable
30	Write-down feature	Not Applicable
31	If write-down, write-down trigger(s)	Not Applicable
32	If write-down, full or partial	Not Applicable
33	If write-down, permanent or temporary	Not Applicable
34	If temporary write-down, description of write-up mechanism	Not Applicable
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Surbodinated to claims of General Creditors and claims of Depositors
36	Non-compliant transitioned features	Not Applicable
37	If yes, specify non-compliant features	Not Applicable

1	Issuer	Botswana Development Corporation
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	71000001
3	Governing law(s) of the instrument	Botswana
	Regulatory treatment	Borrowings
4	Transitional Basel III rules	Not Applicable
5	Post-transitional Basel III rules	Not Applicable
6	Eligible at solo/group/group and solo	Solo
7	Instrument type (types to be specified by each jurisdiction)	Loan
8	Amount recognised in regulatory capital (Currency in mil, as of most recent reporting date)	BWP 150
9	Par value of instrument	BWP 150
10	Accounting classification	Borrowings
11	Original date of issuance	18/Oct/2022
12	Perpetual or dated	10 Years
13	Original maturity date	19/Oct/2032
14	Issuer call subject to prior supervisory approval	Not Applicable
15	Optional call date, contingent call dates and redemption amount	-
16	Subsequent call dates, if applicable	Not Applicable
	Coupons / dividends	Coupons paid auterly
17	Fixed or floating dividend/coupon	Floating rate
18	Coupon rate and any related index	10.50%
19	Existence of a dividend stopper	None
20	Fully discretionary, partially discretionary or mandatory	Mandatory
21	Existence of step up or other incentive to redeem	Not Applicable
22	Noncumulative or cumulative	Not Applicable
23	Convertible or non-convertible	Not Applicable
24	If convertible, conversion trigger (s)	Not Applicable
25	If convertible, fully or partially	Not Applicable
26	If convertible, conversion rate	Not Applicable
27	If convertible, mandatory or optional conversion	Not Applicable
28	If convertible, specify instrument type convertible into	Not Applicable
29	If convertible, specify issuer of instrument it converts into	Not Applicable
30	Write-down feature	Not Applicable
31	If write-down, write-down trigger(s)	Not Applicable
32	If write-down, full or partial	Not Applicable
33	If write-down, permanent or temporary	Not Applicable
34	If temporary write-down, description of write-up mechanism	Not Applicable
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Surbodinated to claims of General Creditors and claims of Depositors
36	Non-compliant transitioned features	Not Applicable
37	If yes, specify non-compliant features	Not Applicable

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