



STANBIC IBTC BANK PLC
PILLAR III DISCLOSURES
30 JUNE 2017



Table of contents

1	Introduction	2
1.1	Background	2
1.2	Basel II Framework	3
1.3	Scope of Application	3
1.4	Frequency	4
2	Risk Management Review	5
2.1	Overview	5
2.2	Risk Management Framework	5
2.3	Risk Categories	7
3	Regulatory Capital Structure and Capital Adequacy	11
3.1	Overview	11
3.2	Regulatory Capital	11
3.3	Methodology for Capital Adequacy	12
4	Credit Risk	13
4.1	Principal credit standard and policies	13
4.2	Framework and Governance	14
4.3	Credit risk measurement	16
4.4	Credit Risk Capital	28
5	Market Risk	29
5.1	Overview	29
5.2	Framework and governance	29
5.3	Market risk measurement	30
5.4	Market Risk Capital	37
6	Operational Risk	38
6.1	Overview	38
6.2	Operational Risk Capital	38
7	List of figures and tables	40



1 Introduction

1.1 Background

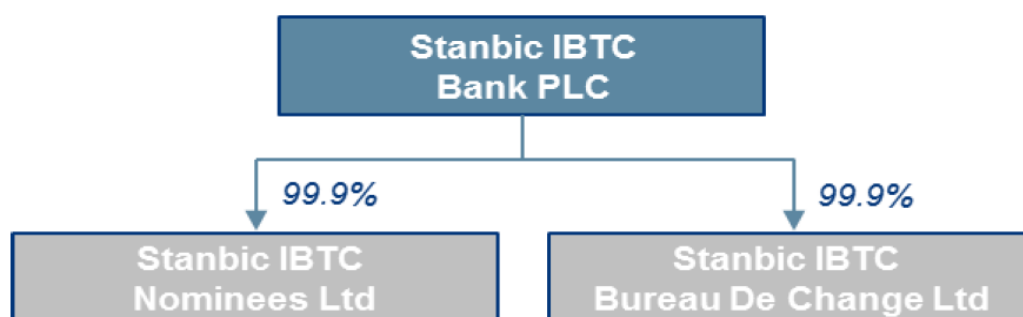
Stanbic IBTC Bank PLC (SIBTC bank or “the bank”) is a wholly owned subsidiary of Stanbic IBTC Holdings PLC, a member of Standard Bank Group Limited. The principal activity of the Bank is the provision of banking and related financial services to corporate and individual customers. The bank offers its clients a wide range of commercial banking products through its branches spread across every state in Nigeria. The bank also offers self-service channels powered by sophisticated technology to bring convenient banking to customers.

The Bank has two core business segments:

Personal and Business Banking : The Personal and Business Banking (PBB) division is the retail banking arm of Stanbic IBTC Bank. The division provides services to individual customers, high net worth individuals and the commercial and small and medium scale enterprises (SME) business segments. PBB supports the everyday banking needs of individuals and businesses through its network of branches and self-service channels. PBB is split into two business lines for effective service delivery - Personal Banking and Business Banking.

Corporate and Transactional Banking : The Corporate and Transactional Banking(CTB) division is responsible for all aspects of corporate and transactional banking services to larger corporates, financial institutions and international counterparties. CTB comprises three business units; Global Markets, Transactional Products and Services and Client Coverage.

The Bank has two wholly owned subsidiaries and eight affiliated companies. An illustrative diagram of Stanbic IBTC Bank’s structure is shown below:



Stanbic IBTC Nominees Nigeria Limited - The company acts in a nominee capacity for clients’ transactions in securities and other investments.



Stanbic IBTC Bureau De Change Limited - The company was licensed to carry on the business of buying, selling, supply, exchange dealing in all foreign currencies and in travellers' cheques where available and providing all services lawful for a bureau de change to provide in Nigeria.

1.2 Basel II Framework

The Basel II framework stipulates a minimum level of capital that banks must maintain to ensure that they can meet their obligations, cover unexpected losses; and can, very importantly, promote public confidence. It also specifies comprehensive disclosure requirements for banks operating under the framework.

The Basel II framework is based on three pillars:

- Pillar I - Minimum Capital Requirements. This details various approaches to measure and quantify capital required for the three major risk components that a bank faces: credit risk, market risk and operational risk. SIBTC bank has adopted the Standardized Approach for Credit and Market Risk and the Basic Indicator Approach for Operational Risk.
- Pillar II - Supervisory Review. This is structured along two separate but complementary stages; the Internal Capital Adequacy Assessment Process (ICAAP) and the Supervisory Review and Evaluation process (SREP). The bank conducts a self-assessment of its internal capital requirements via the ICAAP whilst the Central Bank of Nigeria (CBN) conducts its assessment of the bank via the SREP.
- Pillar III – Market Discipline. This allows market participants access information on risk exposure and risk management policies and procedures through disclosures. The bank through this Pillar III Disclosures report provides an overview of its risk management practices in line with the CBN Guidance Notes on Pillar III Disclosures.

1.3 Scope of Application

Stanbic IBTC Bank PLC produces consolidated and separate financial statements for accounting purposes under International Financial Reporting Standards (IFRS) . These disclosures have been prepared at the individual parent entity level and are in accordance with the CBN guidance notes on Pillar 3, which covers the qualitative and quantitative disclosure requirements therein. The investment in subsidiaries, Stanbic IBTC Nominees Nigeria Limited and Stanbic IBTC Bureau De Change Limited have been deducted from regulatory capital for capital adequacy purposes.



1.4 Frequency

The Pillar III Disclosures Report will be published on bi-annual basis and will be made available through the bank's website at www.stanbicbank.com.



2 Risk Management Review

2.1 Overview

Stanbic IBTC Bank, a subsidiary of the Stanbic IBTC Group, is aligned with the Group's strategic focus of being the leading end-to-end financial solutions provider in Nigeria through innovation and customer focused people. To successfully achieve this, the Bank is aware of the need to maintain a critical balance between the pursuit of growth and the need to have a firm management of the risks facing its business.

Effective risk management is one of Stanbic IBTC's trademark and thus a priority in its activities. This entails identifying the nature, amount and extent of all risks and structuring each risk in such a way that it not only conforms to the bank's risk appetite, but also offers corresponding risk premium and return. We combine prudence in risk management with the use of well-tested risk management techniques that support the generation of robust earnings whilst preserving shareholder value.

The Board sets the tone for a responsive and accountable organisational and risk culture, which permeates through the organisation to each business manager and independent risk officer.

Risks are managed according to a set of governance standards, which are implemented across the bank and are supported by appropriate risk policies, governance standards and procedures. The bank has adopted the Enterprise Risk Management (ERM) framework with an independent control process that provides an objective view of risk taking activities across all business and risk types at both an individual and aggregated portfolio level.

The bank seeks to achieve the right balance between risk and reward in its businesses, and limits adverse variations in earnings by appropriately managing its capital within specified risk appetite levels.

2.2 Risk Management Framework

Approach and Structure

The bank's approach to risk management is based on governance processes that rely on both individual responsibility and collective oversight that is supported by a tailored Management Information System (MIS). This approach balances corporate oversight at senior management level with independent risk management structures in the business. Business unit heads, as part of the first line of defence, are specifically responsible for the management of risk within their businesses using appropriate risk management frameworks that meet the required minimum standards.

An important element that underpins the bank's approach to the management of all risk is independence and appropriate segregation of responsibilities between Business and Risk. All principal risks are supported by the Risk department.

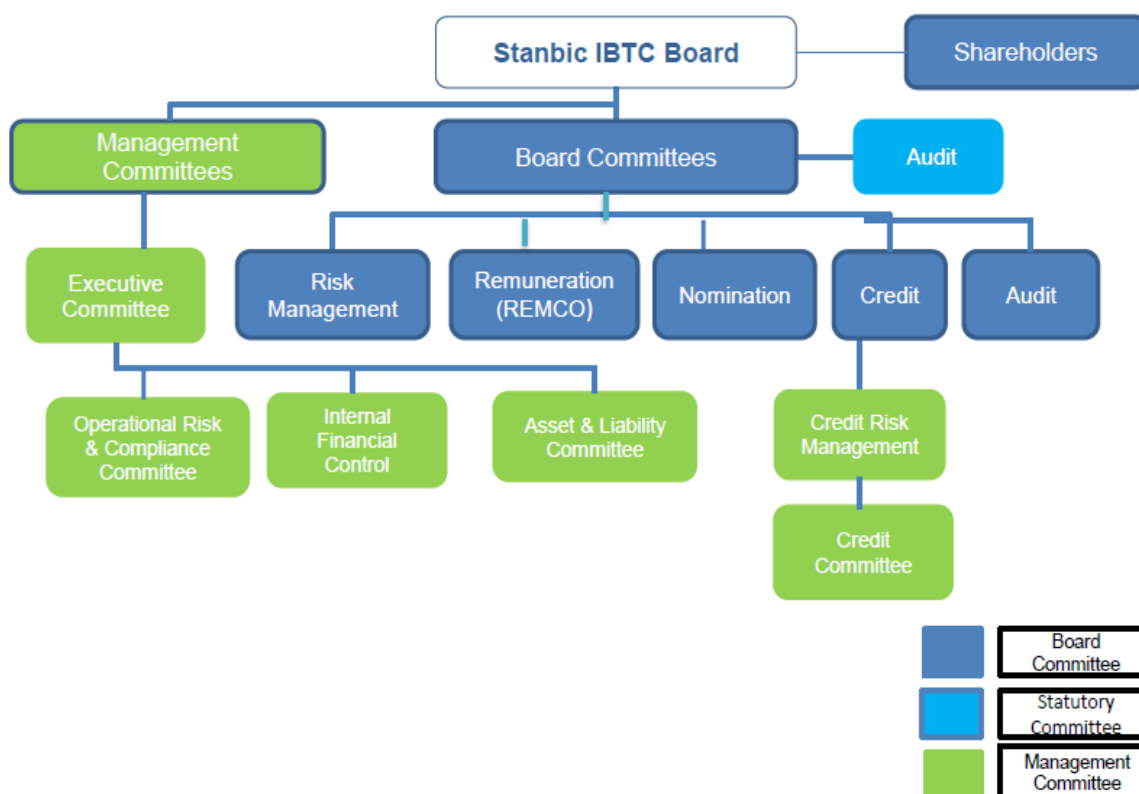


Risk Governance Structure

The risk governance structure provides a platform for the board, executive and senior management through the various committees to evaluate and debate key existential and emerging risks which the bank is exposed to, and assess the effectiveness of risk responses through the risk profiles of the underlying business units and functional areas (please refer to the pictorial representation of the bank risk governance structure below).

The risk governance structure is designed such that there is a forum for managing issues related to each of the material risks to which SIBTC bank is exposed to in addition to a forum for managing integrated risk issues. Risk management issues that arise are escalated through the bank's governance structure to ensure that they are resolved by the appropriate functional group or attain sufficient visibility at the level of the Executive and Board committees.

Figure 1: SIBTC bank risk management and compliance structure



Risk governance standards, policies and procedures

The bank has developed a set of risk governance standards for each principal risk including credit, market, operational, IT and compliance risks. The standards define the acceptable conditions for the assumption of the major risks and ensure alignment and consistency in the manner in which these risks are identified, measured, managed, controlled and reported, across the bank.



All standards are supported by policies and procedural documents. They are applied consistently across the bank and are approved by the Board. It is the responsibility of the business unit executive management to ensure that the requirements of the risk governance standards, policies and procedures are implemented within the business units.

Risk Appetite

Risk appetite is an expression of the amount, type and tenure of risk that the bank is prepared to accept in order to deliver its business objectives. It is the balance of risk and return as the bank implements business plans, whilst recognising a range of possible outcomes.

The Board establishes the bank's parameters for risk appetite by:

- providing strategic leadership and guidance;
- reviewing and approving annual budgets and forecasts; and
- regularly reviewing and monitoring the bank's performance in relation to set risk appetite.

The risk appetite is defined by several metrics which are then converted into limits and triggers across the relevant risk types, at both entity and business line levels, through an analysis of the risks that impact them.

Stress Testing

Stress testing serves as a diagnostic and forward looking tool to improve the bank's understanding of its credit; market and operational risks profile under event based scenarios. Management reviews the outcome of stress tests and selects appropriate mitigating actions to minimise and manage the impact of the risks to the bank. Residual risk is then evaluated against the risk appetite.

2.3 Risk Categories

The bank's enterprise risk management framework is designed to govern, identify, measure, manage, control and report on the principal risks to which the bank is exposed. The principal risks are defined as follows:

2.3.1 Credit Risk

Credit risk arises primarily in the bank's operations where an obligor / counterparty fails to perform in accordance with agreed terms or where the counterparty's ability to meet such contractual obligation is impaired. Credit risk comprises counterparty risk, wrong-way risk, settlement risk, country risk and concentration risk.

**Counterparty risk:**

Counterparty risk is the risk of loss to the bank as a result of failure by a counterparty to meet its financial and/or contractual obligations to the bank. It has three components:

- i. primary credit risk which is the Exposure At Default (EAD) arising from lending and related banking product activities, including their underwriting;
- ii. pre-settlement credit risk which is the EAD arising from unsettled forward and derivative transactions, arising from the default of the counterparty to the transaction and measured as the cost of replacing the transaction at current market rates; and
- iii. issuer risk which is the EAD arising from traded credit and equity products, and including their underwriting.

Wrong-way risk:

Wrong-way risk is the risk that arises when default risk and credit exposure increase together. There are two types of wrong-way risk as follows: specific wrong way risk (which arises through poorly structured transactions, for example, those collateralized by own or related party shares) and general wrong way risk (which arises where the credit quality of the counterparty may for non-specific reasons be held to be correlated with a macroeconomic factor which also affects the credit quality of the counterparty).

Settlement risk:

Settlement risk is the risk of loss to the bank from a transaction settlement, where value is exchanged, failing such that the counter value is not received in whole or part.

Country and cross border risk:

Country and cross border risk is the risk of loss arising from political or economic conditions or events in a particular country which reduce the ability of counterparties in that particular country to fulfil their obligations to the bank. Cross border risks is the risk of restriction on the transfer and convertibility of local currency funds, into foreign currency funds thereby limiting payment by offshore counterparties to the bank.

Concentration risk:

Concentration risk refers to any single exposure or group of exposures large enough to cause credit losses which threaten the bank's capital adequacy or ability to maintain its core operations. It is the risk that common factors within a risk type or across risk types cause credit losses or an event occurs within a risk type which results to credit losses.



2.3.2 Market Risk

Market risk is defined as the risk of a change in the actual or effective market value or earnings of a portfolio of financial instruments caused by adverse moves in market variables such as equity, bond and commodity prices, foreign exchange rates, interest rates, credit spreads, recovery rates, correlations and implied volatilities in the market variables. Market risk covers both the impact of these risk factors on the market value of traded instruments as well as the impact on the bank's net interest margin as a consequence of interest rate risk on banking book assets and liabilities.

2.3.3 Liquidity Risk

Liquidity risk is defined as the risk that the bank, although balance-sheet solvent, cannot maintain or generate sufficient cash resources to meet its payment obligations in full as they fall due (as a result of funding liquidity risk), or can only do so at materially disadvantageous terms (as a result of market liquidity risk). Funding liquidity risk refers to the risk that the counterparties, who provide the bank with funding, will withdraw or not roll-over that funding. Market liquidity risk refers to the risk of a generalised disruption in asset markets that makes normal liquid assets illiquid and the potential loss through the forced-sale of assets resulting in proceeds being below their fair market value.

2.3.4 Operational Risk

Operational risk is defined as the risk of loss resulting from inadequate or failed processes, people and systems (including information technology and infrastructure) or from external events. The definition of operational risk also includes:

- information risk – the risk of unauthorised use, modification or disclosure of information resources;
- fraud risk – the risk of losses resulting from fraudulent activities;
- environmental risk – the risk of inadvertently participating in the destruction of the environment;
- legal risk - the risk that the bank will be exposed to litigation;
- taxation risk – the risk that the bank will incur a financial loss due to incorrect interpretation and application of taxation legislation or due to the impact of new taxation legislation on existing business;
- compliance risk - the risk that the bank does not comply with applicable laws and regulations or supervisory requirements.



- digitization risk - this relates to risk emanating from the rapid rollout of disruptive innovation and/or new technologies within the financial services industry that may outpace Stanbic IBTC ability to compete and/manage the risk appropriately without making significant changes to our business operating model. It further includes concerns around the security and privacy capabilities emanating from the continued advances of technology in the form of digital operations to harvest new sources of value through business model innovation.

2.3.5 Business Risk

Business risk is the risk of loss due to adverse local and global operating conditions such as decrease in demand, increased competition, increased cost, or by entity specific causes such as inefficient cost structures, poor choice of strategy, reputation damage or the decision to absorb costs or losses to preserve reputation.

Reputational risk is a risk of loss resulting from damages to a firm's reputation.



3 Regulatory Capital Structure and Capital Adequacy

3.1 Overview

The bank manages its capital base to achieve a prudent balance between maintaining capital ratios to support business growth and depositor confidence, and providing competitive returns to shareholders. The capital management process ensures that the bank maintains sufficient capital levels for legal and regulatory compliance purposes. The bank ensures that its actions do not compromise sound governance and appropriate business practices and it eliminates any negative effect on payment capacity, liquidity and profitability. The Central Bank of Nigeria (CBN) adopted the Basel II capital framework with effect from 1 October 2014 and revised the framework in June 2015. Stanbic IBTC Bank PLC has been compliant with the requirements of Basel II capital framework since it was adopted.

3.2 Regulatory Capital

The bank's regulatory capital is divided into two tiers:

- Tier 1 capital which comprises share capital, share premium, retained earnings and reserves created by appropriations of retained earnings. The closing balances on deferred tax asset and intangible asset are deducted in arriving at Tier 1 capital;
- Tier 2 capital which includes subordinated debts and other comprehensive income. Subordinated debt at the end of the period totalled N28bn and is broken down as follows:
 - Naira denominated subordinated debt totalling N15.6bn issued on 30 September 2014 at an interest rate of 13.25% per annum;
 - N100 million Naira denominated subordinated debt issued on 30 September 2014. Interest is payable semi-annually at 6-month Nigerian Treasury Bills yield plus 1.20%. It has a tenor of 10 years and is callable after 5 years from the issue date. The debt is unsecured;
 - USD denominated term subordinated non-collateralised facility of USD40 million obtained from Standard Bank of South Africa effective 31 May 2013. The facility expires on 31 May 2025 and is repayable at maturity. Interest on the facility is payable semi-annually at LIBOR (London Interbank Offered Rate) plus 3.60%.

Total eligible Tier 1 Capital as at 30 June 2017 was N112.5bn (2016: N99bn) while Total eligible Tier 2 Capital as at 30 June 2017 was N28bn (2016: N28bn).

Investment in unconsolidated subsidiaries and associations are deducted from Tier 1 and 2 capital to arrive at total regulatory capital, with Tier 2 capped at 33.33% of Tier 1, resulting in a total qualifying capital of N141bn as at 30 June 2017.



3.3 Methodology for Capital Adequacy

Regulatory capital adequacy is measured based on Pillar 1 of the Basel II capital framework. Capital adequacy ratio is calculated by dividing the capital held by total risk-weighted assets. Risk weighted assets comprise computed risk weights from credit, operational and market risks associated with the business of the bank. Management monitors the capital adequacy ratio on a proactive basis.

Throughout the period under review, Stanbic IBTC Bank PLC operated above its targeted capitalization range and well over the minimum regulatory capital adequacy ratio of 10% as mandated by CBN.

Table 1: SIBTC Bank PLC capital adequacy computation as at 30 June 2017

	30 June 2017 N'million	31 Dec 2016 N'million
Tier 1	121,532	108,228
Paid-up share capital	1,875	1,875
Irredeemable Preference Shares	-	-
Share premium	42,469	42,469
General reserve (Retained Profit)	53,235	40,664
SMEEIS reserve	1,039	1,039
AGSMEEIS reserve	749	-
Statutory reserve	22,153	22,153
Other reserves	12	28
Non controlling interests	-	-
Less: regulatory deduction	8,999	9,084
Goodwill	-	-
Deferred tax assets	8,321	8,321
Other intangible assets	628	713
Investment in the capital of financial subsidiaries	50	50
Excess exposure(s) over single obligor without CBN approval	-	-
Exposures to own financial holding company	-	-
Unsecured lending to subsidiaries within the same group	-	-
Unsecured lending to subsidiaries within the same group	-	-
Eligible Tier I capital	112,533	99,144
Tier II	28,120	28,149
Hybrid (debt/equity) capital instruments	-	-
Subordinated term debt	28,015	27,964
Other comprehensive income (OCI)	105	185
Less: regulatory deduction	50	50
Reciprocal cross-holdings in ordinary shares of financial institutions	-	-
Investment in the capital of banking and financial institutions	-	-
Investment in the capital of financial subsidiaries	50	50
Exposures to own financial holding company	-	-
Unsecured lending to subsidiaries within the same group	-	-
Eligible Tier II capital	28,070	28,099
Total regulatory capital	140,603	127,243
Risk weighted assets:		
Credit risk	534,642	458,266
Operational risk	146,986	146,986
Market risk	15,425	1,917
Total risk weight	697,053	607,169
Total capital adequacy ratio	20.2%	21.0%
Tier I capital adequacy ratio	16.1%	16.3%



4 Credit Risk

4.1 Principal credit standard and policies

The Risk Governance Standard, as reviewed regularly, sets out the broad overall principles to be applied in credit risk decisions and sets out the overall framework for the consistent and unified governance, identification, measurement, management and reporting of credit risk.

The Corporate and Transactional Banking (CTB) and the Personal and Business Banking (PBB) Global Credit Policies have been designed to expand the Credit Risk Governance Standard requirements by embodying the core principles for identifying, measuring, approving, and managing credit risk. These policies provide a comprehensive framework within which all credit risk emanating from the operations of the bank are legally executed, properly monitored and controlled in order to minimize the risk of financial loss; and assure consistency of approach in the treatment of regulatory compliance requirements.

In addition to the Credit Risk Governance Standard, CTB and PBB Global Credit Policies, a number of related credit policies and documents have been developed, with contents that are relevant to the full implementation and understanding of the credit policies.

Methodology for risk rating

Internal counterparty ratings and default estimates that are updated and enhanced from time-to-time play an essential role in the credit risk management and decision-making process, credit approvals, internal capital allocation, and corporate governance functions. Ratings are used for the following purposes:

- Credit assessment and evaluation
- Credit risk monitoring
- Credit approval and delegated authority
- Economic capital calculation, portfolio and management reporting
- Regulatory capital calculation
- RARORC (Risk-Adjusted Return on Regulatory Capital) calculation
- Pricing: PDs, EADs, and LGDs may be used to assess and compare relative pricing of assets/facilities, in conjunction with strategic, relationship, market practice and competitive factors.

The starting point of all credit risk assessment and evaluation lies in the counterparty risk grading, which is quantified and calculated in compliance with the bank's credit rating policy and using such Basel-2 compliant models as are in current use and which are updated or enhanced from time to time.

Credit risk quantification for any exposure or portfolio is summarised by the calculation of the expected loss (EL), which is arrived at in the following way:



- Based on the risk grading foundation which yields the counterparty's probability of default (PD), the nature and quantum of the credit facilities are considered;
- A forward-looking quantification of the exposure at default (EAD) is determined in accordance with bank standard guidelines.
- Risk mitigants such as security and asset recovery propensities are then quantified to moderate exposure at default to yield the loss given default (LGD).
- Finally, the EL is a function of the PD, the LGD and the EAD.

These parameters are in turn used in quantifying the required regulatory capital reserve, using the Regulatory Capital Calculator developed, maintained and updated in terms of Basel 2, and the economic capital implications through the use of Credit Portfolio Management's (CPM's) Economic Capital tools. Furthermore, bearing in mind the quantum of the facility and the risk/reward thereof, an appropriate consideration of Basel 2 capital requirements (where applicable) and the revenue and return implications of the credit proposal.

4.2 Framework and Governance

Credit risk remains a key component of financial risks faced by any bank given the very nature of its business. The importance of credit risk management cannot be over emphasized as consequences can be severe when neglected. The bank has established sound governance principles to ensure that credit risk is managed effectively within a comprehensive risk management and control framework.

In reaching credit decisions and taking credit risk, both the credit and business functions must consistently and responsibly balance risk and return, as return is not the sole prerogative of business neither is credit risk the sole prerogative of credit. Credit (and the other risk functions, as applicable) and business must work in partnership to understand the risk and apply appropriate risk pricing, with the overall aim of optimising the bank's risk adjusted performance. The reporting lines, responsibilities and authority for managing credit risk in the bank are very clear and independent. However, ultimate responsibility for credit risk rests with the board and which has delegated this to the following organs:

Board credit committee

The purpose of the board credit committee is to ensure that effective credit governance is in place in order to provide for the adequate management, measurement, monitoring and control of credit risk including country risk. In addition to its pre-existing role, the committee has also been vested with the following responsibilities as may be set by the board:



- setting overall risk appetite;
- reviewing and approving credit facilities that are within monetary limits as approved by the board;
- ensuring committees within the structure operate according to defined mandates and delegated authorities;
- maintaining overall accountability and authority for the adequacy and appropriateness of all aspects of the bank credit risk management process;
- utilising appropriate tools to measure, monitor and control credit risk in line with the bank's policies;
- recommending the bank's credit policies and guidelines for board approval; and
- any other matters relating to credit as may be delegated to the committee by the board.

Credit Committee

The credit committee (CC) is the senior management credit decision-making function of the bank with a defined delegated authority (DA) as determined by the board through the board credit committee from time to time. The credit committee exercises responsibility for the independent assessment, approval, review and monitoring of all credit risk assets relating to the bank's business, while ensuring that the origination and management of the assets comply with the principles documented in the credit risk governance standard.

In addition to the above, the CC ensures that the credit portfolio is maintained within the risk appetite set by the board credit committee.

Credit risk management committee

The credit risk management committee (CRMC) is the senior management credit oversight function with a defined oversight role as determined by the board through the board credit committee from time to time. The CRMC effectively enhances credit discipline within the bank and is responsible for controlling, inter alia, delegated authorities, concentration risk, and regulatory issues pertaining to credit, credit audits, policy and governance. In addition to the above, the CRMC provides oversight of governance; recommends to the board credit committee the level of the bank's risk appetite; monitors model performance, development and validation; determine counterparty and portfolio risk limits and approval, country, industry, market, product, customer segment and maturity concentration risk; risk mitigation; impairments and risk usage.

Heads of CTB and PBB Credit

The heads of CTB credit and PBB credit ensure granularity and function-specific details at the business unit levels. They have functional responsibility for credit risk management across the



bank and are positioned at sufficiently senior levels in order to ensure the necessary experience and independence of judgment.

They are responsible for providing an independent and objective check on credit risk taking activities to safeguard the integrity of the entire credit risk process.

Credit risk mitigation

Credit risk mitigation is defined as all methods of reducing credit expected loss whether by means of reduction of EAD (e.g. netting), risk transfer (e.g. guarantees) or risk transformation. Guarantees, collateral and the transaction structures are used by the bank to mitigate credit risks both identified and inherent, though the amount and type of credit risk is determined on a case by case basis. The bank's credit policy and guidelines are used in a consistent manner while security is valued appropriately and reviewed regularly for enforceability and to meet changing business needs.

Processes and procedures for accepting, verifying, maintaining, and releasing collateral are well documented in order to ensure appropriate application of the collateral management techniques.

Credit delegated authority

In terms of specific delegated authority (DA) levels approved (and updated from time to time) by the board upon advise, authority for approval of any credit facilities accorded to counterparties is vested in individuals, and/or groups of individuals acting in concert, and/or credit committees.

Such DA levels are quantified according to counterparty risk grade. Individuals may be accorded DA levels on the authority of the parties specifically mandated to do so in terms of the credit governance framework.

The global credit committee approves based on the mandate given to them by the board credit committee. All approvals are sanctioned by the board credit committee. The board credit committee approves all insider-related credit irrespective of the amount.

4.3 Credit risk measurement

A key element in the measurement of credit risk is the assignment of credit ratings, which are used to determine expected defaults across asset portfolios and risk bands. The risk ratings attributed to counterparties are based on a combination of factors which cover business and financial risks:



The bank uses the PD Master Scale rating concept with a single scale to measure the credit riskiness of all counterparty types. The grading system is a 25-point scale, with three additional default grades.

Group's rating	Grade description	Standard & Poor's	Fitch
SB01 - SB12/SB13	Investment grades	AAA to BBB-	AAA to BBB-
SB14 - SB21	Sub Investment grades	BB+ to CCC	BB+ to CCC
SB22 – SB25	Cautionary grades	CCC to C	CCC to C

Stanbic IBTC Bank PLC's own rating (Fitch)		
	2016	2015
National		
Long- Term IDR	AAA(nga)	AAA(nga)
Short- Term IDR	F1+(nga)	F1+(nga)
Sovereign risk		
Foreign-Currency Long-Term IDR	B+	B+
Local-Currency Long-Term IDR	B+	B+
Country Ceiling	B+	B+

Maximum exposure to credit risk

Loans and advances are analyzed and categorized based on credit quality using the following definitions.

Performing loans

They are defined as:

Neither past due nor specifically impaired loans, which are loans that are current and fully compliant with all contractual terms and conditions.

Early arrears but not specifically impaired loans include those loans where the counterparty has failed to make contractual payments and payments are less than 90 days past due, but it is expected that the full carrying value will be recovered when considering future cash flows, including collateral. Ultimate loss is not expected but could occur if the adverse conditions persist.

Non-performing loans

Non-performing loans are those loans for which:

- the bank has identified objective evidence of default, such as a breach of a material loan covenant or condition; or
- instalments are due and unpaid for 90 days or more.



Non-performing but not specifically impaired loans are not specifically impaired due to the expected recoverability of the full carrying value when considering future cash flows, including collateral.

Non-performing specifically impaired loans are those loans that are regarded as non-performing and for which there has been a measurable decrease in estimated future cash flows. Specifically impaired loans are further analyzed into the following categories:

- substandard items that show underlying well-defined weaknesses and are considered to be specifically impaired;
- doubtful items that are not yet considered final losses due to some pending factors that may strengthen the quality of the items; and
- loss items that are considered to be uncollectible in whole or in part. The bank provides fully for its anticipated loss, after taking collateral into account.

Figure 2: Loan Classification

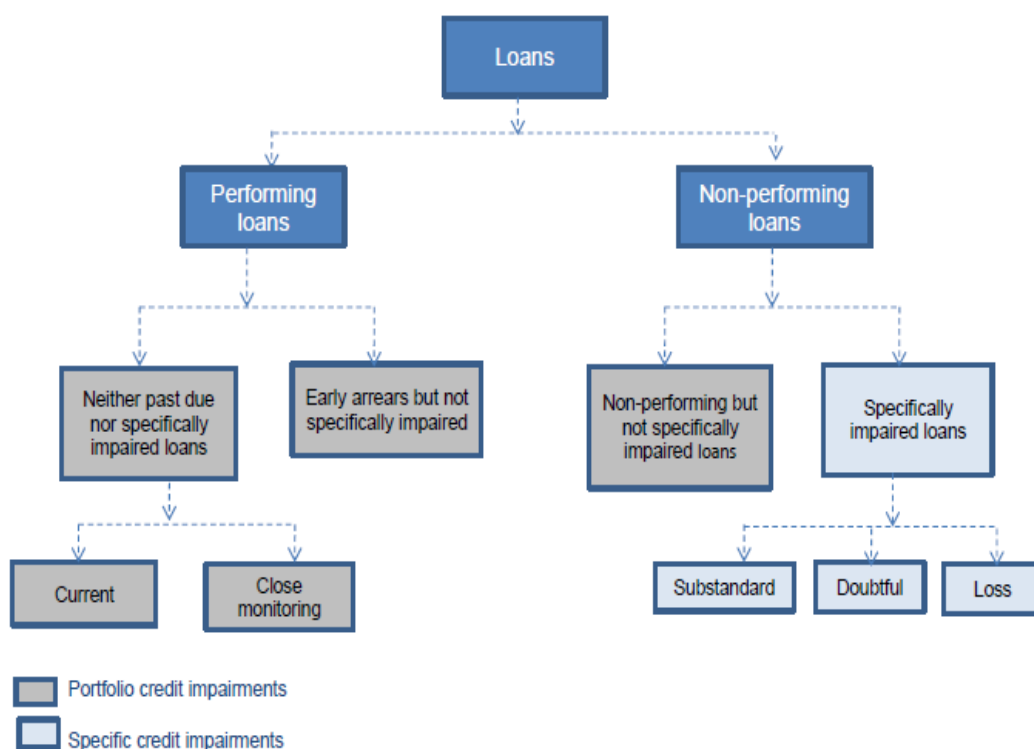




Table 2: Maximum Exposure to credit risk by credit quality- June 2017

June 2017	Total Loans and Advances to Customers N'million	Balance sheet impairments for performing loans N'million	Performing loans					Non-performing loans											
			Neither past due nor specifically impaired		Not specifically impaired			Specifically impaired loans										Total non-performing loans N'million	Non-performing loans %
			Normal monitoring N'million	Close monitoring N'million	Early arrears N'million	Non-performing loans							Securities and expected recoveries on specifically impaired loans N'million	Net after securities and expected recoveries on specifically impaired loans N'million	Balance sheet impairments for non-performing specifically impaired loans N'million	Gross specific impairment coverage %			
						Sub-standard N'million	Doubtful N'million	Loss N'million	Total N'million										
Personal & Business Banking	139,092	3,492	94,968	11,355	17,087	5,932	5,293	4,456	15,681	6,536	9,145	9,145	58	15,681	11.3				
Mortgage loans	8,370	89	4,220	1,599	2,294	136	149	39	324	120	204	204	63	324	3.9				
Instalment sale and finance leases	14,148	495	6,167	2,387	2,623	1,097	1,385	489	2,971	1,484	1,487	1,487	50	2,971	21.0				
Card debtors	1,471	30	926	-	276	61	66	142	269	21	248	248	92	269	18.3				
Other loans and advances	115,103	2,878	83,655	7,369	11,894	4,638	3,693	3,786	12,117	4,911	7,206	7,206	59	12,117	10.5				
Corporate & Transactional Banking	254,596	8,015	204,358	24,651	7,711	1,748	13,456	-	15,204	10,123	5,081	5,081	33	17,877	7.0				
Corporate loans	254,596	8,015	204,358	24,651	7,711	1,748	13,456		15,204	10,123	5,081	5,081	33	17,877	7.0				
Gross loans and advances	393,688	11,507	299,326	36,006	24,798	7,680	18,749	4,456	30,885	16,659	14,226	14,226	46	33,558	8.5				
Less:																			
Impairment for loans and advances	(25,732)																		
Net loans and advances	367,956																		
Add the following other banking activities exposures:																			
Cash and cash equivalents	315,092																		
Derivatives	26,490																		
Financial investments (excluding equity)	275,022																		
Asset held for sale	-																		
Loans and advances to banks	8,677																		
Trading assets	84,569																		
Pledged assets	28,938																		
Other financial assets	87,552																		
Total on-balance sheet exposure	1,194,296																		
Unrecognised financial assets:																			
Letters of credit	73,975																		
Guarantees	19,539																		
Loan commitments	26,170																		
Total exposure to credit risk	1,313,980																		



Table 3: Maximum Exposure to credit risk by credit quality- December 2016

December 2016	Total Loans and Advances to Customers N'million	Balance sheet impairments for performing loans N'million	Performing loans			Non-performing loans												
			Neither past due nor specifically impaired		Not specifically impaired	Specifically impaired loans											Total non-performing loans N'million	Non-performing loans %
			Normal monitoring N'million	Close monitoring N'million	Early arrears N'million	Non-performing loans				Total N'million	Securities and expected recoveries on specifically impaired loans N'million	Net after securities and expected recoveries on specifically impaired loans N'million	Balance sheet impairments for non-performing specifically impaired loans N'million	Gross specific impairment coverage %				
						Sub-standard N'million	Doubtful N'million	Loss N'million										
Personal & Business Banking	152,360	3,510	86,221	25,092	22,371	8,035	4,803	5,836	18,675	7,426	11,249	11,249	60	18,675	12.3			
Mortgage loans	8,924	51	5,396	1,472	1,798	189	27	42	258	94	164	164	64	258	2.9			
Instalment sale and finance leases	16,532	275	6,141	5,277	3,417	1,111	68	518	1,697	917	781	781	46	1,697	10.3			
Card debtors	1,793	48	1,185	-	380	68	92	68	228	14	214	214	94	228	12.7			
Other loans and advances	125,111	3,135	73,500	18,343	16,777	6,667	4,616	5,209	16,491	6,401	10,090	10,090	61	16,491	13.2			
Corporate & Transactional Banking	222,956	7,591	194,856	5,995	22,104	-	-	-	-	0	-	-	-	-	-			
Corporate loans	222,956	7,591	194,856	5,995	22,104	-	-	-	-	0	-	-	-	-	-			
Gross loans and advances	375,316	11,101	281,078	31,088	44,476	8,035	4,803	5,836	18,675	7,426	11,249	11,249	60	18,675	5.0			
Less:																		
Impairment for loans and advances	(22,351)																	
Net loans and advances	352,965																	
Add the following other banking activities exposures:																		
Cash and cash equivalents	289,312																	
Derivatives	14,317																	
Financial investments (excluding equity)																		
Asset held for sale	217,518																	
Loans and advances to banks	15,264																	
Trading assets	15,657																	
Pledged assets	28,303																	
Other financial assets	26,665																	
Total on-balance sheet exposure	960,001																	
<i>Unrecognised financial assets:</i>																		
Letters of credit	15,620																	
Guarantees	38,523																	
Loan commitments	30,193																	
Total exposure to credit risk	1,044,337																	



Table 4: Ageing of loans and advances past due but not specifically impaired

	Less than 31 days N'million	31-60 days N'million	61-89 days N'million	90-180 days N'million	More than 180 days N'million	Total N'million
June 2017						
Personal and Business Banking	10,076	3,045	3,966	-	-	17,087
Mortgage loans	1,773	388	133	-	-	2,294
Instalment sales and finance lease	368	100	2,155	-	-	2,623
Card debtors	177	61	38	-	-	276
Other loans and advances	7,758	2,496	1,640	-	-	11,894
Corporate and Investment Banking	-	-	7,711	2,673	-	10,384
Corporate loans	-	-	7,711	2,673	-	10,384
Total	10,076	3,045	11,677	2,673	-	27,471
December 2016						
Personal and Business Banking	16,824	3,923	1,624	-	-	22,371
Mortgage loans	1,580	142	77	-	-	1,799
Instalment sales and finance lease	1,800	1,054	562	-	-	3,416
Card debtors	200	131	49	-	-	380
Other loans and advances	13,244	2,596	936	-	-	16,776
Corporate and Investment Banking	-	8,675	13,430	-	-	22,105
Corporate loans	-	8,675	13,430	-	-	22,105
Total	16,824	12,598	15,054	-	-	44,476

Table 5: Past dues exposures and impairment by geography

30 Jun. 2017	Gross Exposure N million	Past Due Exposure N million	Amount Impaired N million
South South	14,351	1,491	1,178
South West	333,318	22,826	9,230
South East	8,818	1,472	987
North West	21,415	3,963	1,967
North Central	14,141	1,060	805
North East	1,645	73	59
Outside Nigeria	8,677	-	-
Carrying amount	402,365	30,885	14,226
31 Dec. 2016	Gross Exposure N million	Past Due Exposure N million	Amount Impaired N million
South South	15,021	1,756	1,315
South West	308,662	9,523	5,652
South East	7,153	487	375
North West	25,605	3,664	2,273
North Central	24,560	3,191	1,588
North East	1,819	54	46
Outside Nigeria	7,760	-	-
Carrying amount	390,580	18,675	11,249



Table 6: Past dues exposures and impairment by industry

As at 30 June 2017

	Gross Exposure N million	Past Due Exposure N million	Amount Impaired N million
Agriculture	26,092	1,005	451
Business services	4,281	495	321
Communication	18,520	178	84
Community, social & personal services	1	-	-
Construction & real estate	44,024	620	326
Electricity, gas & water supply	-	-	-
Financial intermediaries & insurance	9,238	-	-
Government	12,825	176	140
Hotels, restaurants and tourism	208	23	14
Manufacturing	132,123	3,236	1,384
Mining & quarrying	61,608	16,246	5,638
Private households	47,471	4,759	3,848
Transport, storage & distribution	11,644	2,914	1,179
Wholesale & retail Trade	34,330	1,233	841
Total	402,365	30,885	14,226

As at 31 Dec. 2016

	Gross Exposure N million	Past Due Exposure N million	Amount Impaired N million
Agriculture	29,424	3,128	1,799
Business services	4,548	967	753
Communication	22,500	2,643	1,119
Community, social & personal services	2	-	-
Construction & real estate	38,066	322	176
Electricity, gas & water supply	-	-	-
Financial intermediaries & insurance	16,870	-	-
Government	14,631	119	94
Hotels, restaurants and tourism	35	23	14
Manufacturing	101,242	1,726	585
Mining & quarrying	65,578	2,114	1,704
Private households	52,511	4,313	3,462
Transport, storage & distribution	12,140	1,885	614
Wholesale & retail Trade	33,033	1,435	929
Total	390,580	18,675	11,249

Renegotiated loans and advances

Renegotiated loans and advances are exposures which have been refinanced, rescheduled, rolled over or otherwise modified due to weaknesses in the counterparty's financial position, and where it has been judged that normal repayment will likely continue after the restructure. Renegotiated loans that would otherwise be past due or impaired amounted to N13.7 billion as at 30 June 2017 (Dec 2016: N34.8 billion).



Collateral

The table that follows shows the financial effect that collateral has on the bank's maximum exposure to credit risk. The table is presented according to Basel II asset categories and includes collateral that may not be eligible for recognition under Basel II but that management takes into consideration in the management of the bank's exposures to credit risk. All on- and off-balance sheet exposures which are exposed to credit risk, including non-performing assets, have been included.

Collateral includes:

- financial securities that have a tradable market, such as shares and other securities;
- physical items, such as property, plant and equipment; and
- financial guarantees, surety ships and intangible assets.

All exposures are presented before the effect of any impairment provisions.

In the retail portfolio, 54% (Dec 2016: 66%) is collateralised. Of the group's total exposure, 77% (Dec 2016: 64%) is unsecured and mainly reflects exposures to well-rated corporate counterparties, bank counterparties and sovereign entities.

Table 7: June 2017 Breakdown by Collateral

	Total exposure N'million	Unsecured N'million	Secured N'million	Netting agreements N'million	Secured exposure after netting N'million	Total collateral coverage		
						1%-50% N'million	50%-100% N'million	Greater than 100% N'million
June 2017								
Corporate	391,028	204,485	186,543	-	-	50,813	49,678	86,052
Sovereign	270,690	270,690	-	-	-	-	-	-
Bank	415,099	415,099	-	-	-	-	-	-
Retail	186,025	86,184	99,841	-	-	26,241	51,721	21,879
Retail Mortgage	8,439		8,439	-	-			8,439
Other retail	177,586	86,184	91,402	-	-	26,241	51,721	13,440
Total	1,262,842	976,458	286,384	-	-	77,054	101,399	107,931
Add: Financial assets not exposed to credit risk	50,700							
Less: Impairments for loans and advances	(25,732)							
Less: Unrecognised off balance sheet items	(93,514)							
Total exposure	1,194,296							
Reconciliation to statement of financial position:								
Cash and balances with central bank	315,092							
Derivatives	26,490							
Financial investments	275,022							
Loans and advances	376,633							
Trading assets	84,569							
Pledged assets	28,938							
Other financial assets	87,552							
Total	1,194,296							



Table 8: December 2016 Breakdown by Collateral

	Total exposure N'million	Unsecured N'million	Secured agreements N'million	Netting N'million	Secured exposure after netting N'million	Total collateral coverage		
						1%-50% N'million	50%-100% N'million	Greater than 100% N'million
December 2016								
Corporate	291,256	68,300	222,956	-	-	46,763	88,940	87,254
Sovereign	172,648	172,648		-	-	-	-	-
Bank	340,218	340,218		-	-	-	-	-
Retail	166,074	48,399	117,675	-	-	41,972	41,710	33,994
Retail Mortgage	8,924	-	8,924	-	-	-	-	8,924
Other retail	157,150	48,399	108,751	-	-	41,972	41,710	25,070
Total	970,196	629,565	340,631	-	-	88,735	130,649	121,248
Add: Financial assets not exposed to credit risk	66,299							
Less: Impairments for loans and advances	(22,351)							
Less: Unrecognised off balance sheet items	(54,143)							
Total exposure	960,001							
Reconciliation to statement of financial position:								
Cash and balances with central bank	289,312							
Derivatives	14,317							
Financial investments	217,518							
Loans and advances	368,229							
Trading assets	15,657							
Pledged assets	28,303							
Other financial assets	26,665							
Total	960,001							



Concentration of risks of financial assets with credit risk exposure

a) Geographical sectors

Table 9: Breakdown by Geography

At 30 June 2017	Trading assets N'million	Derivative assets N'million	Pledged assets N'million	Financial investments (excluding equity) N'million	Loans and advances to customers N'million	Loans and advances to banks N'million	Total N'million
South South	-	-	-	-	12,862	-	12,862
South West	-	3,334	-	-	314,159	-	317,493
South East	-	9	-	-	7,665	-	7,674
North West	-	11	-	-	18,806	-	18,817
North Central	84,569	22,399	28,938	275,022	12,921	-	423,849
North East	-	-	-	-	1,543	-	1,543
Outside Nigeria	-	737	-	-	-	8,677	9,414
Carrying amount	84,569	26,490	28,938	275,022	367,956	8,677	791,652

At 31 December 2016	Trading assets N'million	Derivative assets N'million	Pledged assets N'million	Financial investments (excluding equity) N'million	Loans and advances to customers N'million	Loans and advances to banks N'million	Total N'million
South South	-	-	-	-	13,445	-	13,445
South West	5,001	1,208	-	-	293,196	-	299,405
South East	-	-	-	-	6,575	-	6,575
North West	-	-	-	-	22,837	-	22,837
North Central	10,656	12,529	28,303	217,518	15,171	7,504	291,681
North East	-	-	-	-	1,741	-	1,741
Outside Nigeria	-	580	-	-	-	7,760	8,340
Carrying amount	15,657	14,317	28,303	217,518	352,965	15,264	644,024



b) Industry Sector

Table 10: Breakdown by Industry Sector

At 30 June 2017	Trading	Derivative	Pledged	Financial	Loans and	Loans and	Total
	assets	assets	assets	investments	advances to	advances to	
	N'million	N'million	N'million	N'million	customers	banks	N'million
Agriculture	-	947	-	-	24,942	-	25,889
Business services	-	62	-	-	3,881	-	3,943
Communication	-	20	-	-	13,926	-	13,946
Community, social & personal services	-	1	-	-	1	-	2
Construction and real estate	-	44	-	-	43,344	-	43,388
Electricity	-	-	-	-	-	-	-
Financial intermediaries & insurance	-	2,076	-	-	552	8,677	11,305
Government (including Central Bank)	84,569	22,399	28,938	275,022	12,449	-	423,377
Hotels, restaurants and tourism	-	-	-	-	189	-	189
Manufacturing	-	671	-	-	129,599	-	130,270
Mining	-	80	-	-	53,969	-	54,049
Private households	-	35	-	-	42,998	-	43,033
Transport, storage and distribution	-	23	-	-	9,593	-	9,616
Wholesale & retail trade	-	132	-	-	32,513	-	32,645
Carrying amount	84,569	26,490	28,938	275,022	367,956	8,677	791,652

At 31 December 2016	Trading	Derivative	Pledged	Financial	Loans and	Loans and	Total
	assets	assets	assets	investments	advances to	advances to	
	N' million	N' million	N'million	N' million	customers	banks	N' million
Agriculture	-	1	-	-	26,205	-	26,206
Business services	-	-	-	-	3,741	-	3,741
Communication	-	-	-	-	21,015	-	21,015
Community, social & personal services	-	-	-	-	2	-	2
Construction and real estate	-	26	-	-	37,546	-	37,572
Electricity	-	-	-	-	-	-	-
Financial intermediaries & insurance	5,001	582	-	-	1,538	7,504	14,625
Government (including Central Bank)	10,656	12,529	28,303	217,518	14,421	7,760	291,187
Hotels, restaurants and tourism	-	-	-	-	21	-	21
Manufacturing	-	1,097	-	-	99,510	-	100,607
Mining	-	-	-	-	58,244	-	58,244
Private households	-	-	-	-	48,215	-	48,215
Transport, storage and distribution	-	-	-	-	11,331	-	11,331
Wholesale & retail trade	-	82	-	-	31,176	-	31,258
Carrying amount	15,657	14,317	28,303	217,518	352,965	15,264	644,024



c) Analysis of financial assets disclosed above by risk rating

Table 11: Breakdown by risk rating

	AAA to A- N'million	BBB+ to BBB- N'million	Below BBB- N'million	Unrated N'million	Total N'million
At 30 June 2017	1,481	593,585	68,597	127,989	791,652
At 31 December 2016	7,666	18,923	568,822	48,613	644,024

Concentration of risks of off balance-sheet engagements

a) Geographical sectors

Table 12: Breakdown by Geography

	30 June 2017			31 Decemebr 2016		
	Bonds and Letters of guarantees credit		June 2017 Total	Bonds and Letters of guarantees credit		2016 Total
	N' million	N' million	N'million	N' million	N' million	N'million
South South	712	-	712	850	-	850
South West	12,167	73,975	86,142	35,176	15,620	50,796
South East	30	-	30	18	-	18
North West	144	-	144	90	-	90
North Central	5,286	-	5,286	2,388	-	2,388
North East	-	-	-	-	-	-
Outside Nigeria	1,200	-	1,200	-	-	-
Carrying amount	19,539	73,975	93,514	38,523	15,620	54,143

b) Industry sectors

Table 13: Breakdown by Industry Sector

	30 June 2017			31 Decemebr 2016		
	Bonds and Letters of guarantees credit		June 2017 Total	Bonds and Letters of guarantees credit		2016 Total
	N' million	N' million	N'million	N' million	N' million	N'million
Agriculture	246	-	246	-	1	1
Business services	5,116	8,747	13,863	437	253	690
Communication	-	-	-	155	118	273
Construction and real estate	1,548	-	1,548	19,248	-	19,248
Electricity	-	-	-	-	-	-
Telecommunications	-	-	-	-	-	-
Financial intermediaries & insurance	1,488	-	1,488	154	31	185
Food and Beverages	-	28,428	28,428	-	-	-
Hotels, restaurants and tourism	-	-	-	10,698	10,462	21,160
Manufacturing	2,886	29,975	32,861	2,845	1,366	4,211
Mining/Oil an Gas	1,012	6,825	7,837	486	-	486
Private households	-	-	-	22	-	22
Transport, storage and distribution	168	-	168	4,478	3,389	7,867
Wholesale & retail trade	7,074	-	7,074	-	-	-
Carrying amount	19,538	73,975	93,513	38,523	15,620	54,143



4.4 Credit Risk Capital

The Bank currently allocates capital for credit risk using the Standardised approach. Risk Weights (RW) have been assigned as per CBN Guidelines for Credit Risk Capital Requirement. The table below shows the credit exposure and risk weighted asset as at 30 June 2017.

Table 14: Credit Exposure and Risk Weighted Asset as at 30 June 2017

Asset Class	Exposure Amount N'million	CRM N'million	Net Exposure N'million	RWA N'million
Sovereigns and Central Banks	502,333	-	502,333	-
State Govt and Local Authorities	-	-	-	-
Public Sector Entities (PSEs)	12,413	29	12,383	12,383
Multilateral Development Banks (MDB)	-	-	-	-
Supervised Institutions	146,993	-	146,993	100,388
Corporate and Other Persons	257,031	-	257,031	224,622
Regulatory Retail Portfolio	31,009	32,409	(1,400)	22,302
Secured by Mortgages on Residential Properties	3,933	1,273	2,660	3,487
Exposures Secured by Mortgages on Commercial Real Estates	49,123	180	48,943	46,510
Past Due Exposures	16,659	2,614	14,045	16,691
Other Balance Sheet Exposures	91,808	-	91,808	41,748
Off Balance Sheet Exposures	74,641	241	74,401	49,645
Regulatory Risk Reserve	-	-	-	(789)
Total	1,185,943	36,746	1,149,197	516,987



5 Market Risk

5.1 Overview

The identification, management, control, measurement and reporting of market risk is categorised as follows:

Trading market risk

These risks arise in trading activities where the bank acts as a principal with clients in the market. The bank policy is that all trading activities are contained within the bank's Corporate and Investment Banking (CTB) trading operations.

Banking book interest rate risk

These risks arise from the structural interest rate risk caused by the differing re-pricing characteristics of banking assets and liabilities.

Foreign currency risk

These risks arise as a result of changes in the fair value or future cash flows of financial exposures due to changes in foreign exchange rates.

Equity investment risk

These risks arise from equity price changes in listed and unlisted investments, and managed through the equity investment committee, which is a sub-committee of the executive committee.

5.2 Framework and governance

The board approves the market risk appetite and standards for all types of market risk. The board grants general authority to take on market risk exposure to the ALCO. ALCO sets market risk policies to ensure that the measurement, reporting, monitoring and management of market risk associated with operations of the bank follow a common governance framework. The bank's ALCO reports to EXCO and also to the BRMC. The in-country risk management is subject to SBG oversight for compliance with group standards and minimum requirements.

The market risk management unit which is independent of trading operations and accountable to ALCO, monitors market risk exposures due to trading and banking activities. This unit



monitors exposures and respective excesses daily, report monthly to ALCO and quarterly to the BRMC.

5.3 Market risk measurement

The techniques used to measure and control market risk include daily net open position, daily VaR, back-testing, Stress testing, PV01, other market risk measures, annual net interest income at risk and daily foreign currency trading position.

Daily foreign currency trading position

The board on the input of ALCO sets limits on the level of exposure by currency and in aggregate for overnight positions. The latter is also aligned to the daily foreign currency trading position limit as specified by the regulators, which is usually a proportion of the banks' capital.

Daily value-at-risk (VaR)

VaR is a technique that estimates the potential losses that may occur as a result of market movements over a specified time period at a predetermined probability.

VaR limits and exposure measurements are in place for all market risks the trading desk is exposed to. The bank generally uses the historical VaR approach to derive quantitative measures, specifically for market risk under normal market conditions. Normal VaR is based on a holding period of one day and a confidence level of 95%. Daily losses exceeding the VaR are likely to occur, on average, 13 times in every 250 days.

The use of historic VaR has limitations as it is based on historical correlations and volatilities in market prices and assumes that future prices will follow the observed historical distribution. Hence, there is a need to back-test the VaR model regularly.

VaR back-testing

The bank back-tests its foreign currency, interest rate and credit trading exposure VaR model to verify the predictive ability of the VaR calculations thereby ensuring the appropriateness of the model. Back-testing exercise is an ex-post comparison of the daily hypothetical profit and loss under the one-day buy and hold assumption to the prior day VaR. Profit or loss for back-testing is based on the theoretical profits or losses derived purely from market moves, both interest rate and foreign currency spot moves, and it is calculated over 250 cumulative trading-days at 95% confidence level.

Stress tests

Stress testing provides an indication of the potential losses that could occur in extreme market conditions.



The stress tests carried out include individual market risk factor testing and combinations of market factors on individual asset classes and across different asset classes. Stress tests include a combination of historical and hypothetical simulations.

PV01

PV01 is a risk measure used to assess the effect of a change of rate of one basis point on the price of an asset. This limit is set for the fixed income, money market trading, credit trading, derivatives and foreign exchange trading portfolios.

Other market risk measures

Other market risk measures specific to individual business units include permissible instruments, concentration of exposures, gap limits, maximum tenor and stop loss triggers. In addition, only approved products that can be independently priced and properly processed are permitted to be traded.

Pricing models and risk metrics used in production systems, whether these systems are off-the-shelf or in-house developed, are independently validated by the market risk unit before their use and periodically thereafter to confirm the continued applicability of the models. In addition, the market risk unit assesses the daily liquid closing price inputs used to value instruments and performs a review of less liquid prices from a reasonableness perspective at least fortnightly. Where differences are significant, mark-to-market adjustments are made.

Annual net interest income at risk

A dynamic forward-looking annual net interest income forecast is used to quantify the banks' anticipated interest rate exposure. This approach involves the forecasting of both changing balance sheet structures and interest rate scenarios, to determine the effect these changes may have on future earnings. The analysis is completed under both normal market conditions as well as stressed market conditions.

Analysis of Value-at-Risk (VaR) and actual income

The table below highlights the historical diversified normal VaR across the various trading desks. The minimum and maximum trading diversified normal VaR stood at USD34k and USD2m respectively with an annual average of USD0.6m which translates to a conservative VaR base limit utilisation of 16.2% on average.



Table 15: Diversified Normal VaR Exposures

Diversified Normal VaR Exposures (USD'000)						
Desk	Maximum	Minimum	Average	30-Jun-17	31-Dec-16	Limit
Bankwide	1,950	34	559	703	135	3,455
FX Trading	1,737	16	206	321	114	805
Money markets trading	839	20	482	429	28	1,434
Fixed income trading	153	4	50	56	14	991
Credit trading	-	-	-	-	-	386
Derivatives	-	-	-	-	-	131

Analysis of PV01

The table below shows the PV01 of the money markets banking and the individual trading books. The money markets trading book PV01 exposure increased to N587k from that of the previous year as a result of T-bills purchase of N53bn, the money markets banking book PV01 exposure stood at N10.1m; higher than that of the previous year as a result of T-bills purchase of N22.1bn, while the fixed income trading book PV01 exposure was N667k. Overall trading PV01 exposure was N1.3m against a limit of N8.2m thus reflecting a very conservative exposure utilisation.

Table 16: Analysis of PV01

PV01 (NGN'000)	30-Jun-17	30-Jun-16	Limit
Money market trading book	587	218	4,000
Fixed income trading book	667	104	2,755
Credit trading book	-	-	1,032
Derivatives trading book	-	-	405
Total trading book	1,254	322	8,192
Money market banking book	10,060	8,430	11,800

Interest rate risk in the banking book

Interest rate risk in the banking book (IRRBB) can be defined as the reduction in banking book net interest income due to changes in interest rates arising from the different re-pricing characteristics of banking book assets and liabilities. IRRBB is further divided into the following sub-risk types:

- **Repricing risk** referring to the timing differences in the maturity (fixed rate) and repricing (floating rate) of assets and liabilities.
- **Yield curve risk** arising when unanticipated shifts in the yield curve have adverse effects on the bank's income.
- **Basis risk** arising from the imperfect correlation in the adjustment of the rates earned and paid on different instruments with otherwise similar repricing characteristics.



- **Optionality risk** arising from the options embedded in bank asset and liability portfolios, providing the holder with the right, but not the obligation, to buy, sell, or in some manner alter the cash flow of an instrument or financial contract.
- **Endowment risk** referring to the interest rate risk exposure arising from the net differential between interest rate insensitive assets such as non-earning assets and interest rate insensitive liabilities such as non-paying liabilities and equity.

Approach to managing interest rate risk on positions in the banking book

Banking-related market risk exposure principally involves the management of the potential adverse effect of interest movements on banking book earnings (net interest income and banking book mark-to-market profit or loss).

The bank's approach to managing IRRBB is governed by prudence and is in accordance with the applicable laws and regulations, best international practice and the competitive situation within which it operates in financial markets. Interest rate risk is transferred to and managed within the bank's treasury operations under supervision of ALCO.

Measurement of IRRBB

The analytical technique used to quantify IRRBB is an earnings based approach. A dynamic, forward-looking net interest income forecast is used to quantify the bank's anticipated interest rate exposure. Desired changes to a particular interest rate risk profile are achieved through the restructuring of on-balance sheet repricing or maturity profiles. All assets and liabilities are allocated to gap intervals based on either their repricing or maturity characteristics. However, assets and liabilities for which no identifiable contractual repricing or maturity dates exist are allocated to gap intervals based on behavioural profiling.

The impact on net interest income due to interest rate changes cover 12 months of forecasting and allows for the dynamic interaction of payments, new business and interest rates. The analyses are done under stressed market conditions in which the banking book is subjected to an upward 300 basis points and downward 350 basis points parallel rate shocks for local currency and 100 basis points upward and downward parallel rate shocks for foreign currency positions. The table below shows the sensitivity of the bank's net interest income in response to standardised parallel rate shocks.



Table 17: Parallel Rate Shock Result

30-Jun-17		NGN	USD	Other	Total
Increase in basis points		300	100	100	
Sensitivity of annual net interest income	NGNm	7,391	630	(41)	7,980
Decrease in basis points		350	100	100	
Sensitivity of annual net interest income	NGNm	(8,528)	(482)	41	(8,969)
31-Dec-16		NGN	USD	Other	Total
Increase in basis points		400	100	100	
Sensitivity of annual net interest income	NGNm	3,827	601	(65)	4,363
Decrease in basis points		200	100	100	
Sensitivity of annual net interest income	NGNm	(2,556)	(546)	65	(3,037)

Hedging of endowment risk

IRRBB is predominantly the consequence of endowment exposures, being the net exposure of non-rate sensitive liabilities and equity less non-rate sensitive assets. The endowment risk is hedged using marketable liquid instruments in the same currency as the exposure as and when it is considered opportune. Hedge decisions are made by ALCO following careful consideration of the interest rate views to be hedged against, including magnitude, direction, timing and probability, and the exposure to be hedged.

Market risk on equity investment

The equity committee (EC) has governance and oversight of all investment decisions. The committee is tasked with the formulation of risk appetite and oversight of investment performance. In this regard, a loss trigger is in place for the non-strategic portion.

Currency risk

The bank's foreign exchange positions arise mainly from foreign exchange trading activities, which are governed by position limits approved by the risk management committee in accordance with bank's market risk policy. These position limits are subject to review at least annually and foreign exchange exposures are monitored daily by the market risk function and reviewed monthly to ensure they remain within the approved risk appetite. The bank's policy is not to hold open exposures in respect of the banking book of any significance. The table below summarises foreign currency exposures of the bank as at period end and the net open position thereof.



Table 18: Currency Risk Concentration as at 30 June 2017

Concentrations of currency risk – on- and off-balance sheet financial assets and liabilities						
At 30 June 2017	Naira US Dollar		GBP	Euro	Others	Total
	N million	N million	N million	N million	N million	N million
Financial assets						
Cash and cash equivalents	151,705	153,084	3,036	6,653	614	315,092
Trading assets	84,569	-	-	-	-	84,569
Pledged assets	28,938	-	-	-	-	28,938
Derivative assets	26,459	31	-	-	-	26,490
Financial investments	275,444	-	-	-	-	275,444
Loans and advances to banks	5,893	2,784	-	-	-	8,677
Loans and advances to customers	214,926	151,242	464	1,309	15	367,956
Other financial assets	87,331	192	4	17	8	87,552
	875,265	307,333	3,504	7,979	637	1,194,718
Financial liabilities						
Trading liabilities	39,225	-	-	-	-	39,225
Derivative liabilities	20,968	31	-	-	-	20,999
Deposits and current accounts from banks	39,968	8,467	-	-	184	48,619
Deposits and current accounts from customers	417,855	223,548	2,888	2,691	126	647,108
Other borrowings	16,007	75,487	-	-	-	91,494
Subordinated debt	15,736	12,279	-	-	-	28,015
Other financial liabilities	156,116	55,095	533	3,722	164	215,630
	705,875	374,907	3,421	6,413	474	1,091,090
Net on-balance sheet position	169,390	(67,574)	83	1,566	163	103,628
Off balance sheet	12,222	61,870	697	16,512	2,212	93,513
*Others include ZAR, JPY, CHF, CAD, GHS.						
Period-end spot rate*					2016	2015
US Dollar					305.9	305
GBP					397.41	377.33
Euro					349.08	321.62
*Some foreign currency borrowings were valued at a rate different from interbank rate due to strict foreign exchange regime. See note 21 (vii).						



Table 19: Currency Risk Concentration as at 31 December 2016

Concentrations of currency risk – on- and off-balance sheet financial instruments						
At 31 December 2016	Naira	US Dollar	GBP	Euro	Others*	Total
	N million	N million	N million	N million	N million	N million
Financial assets						
Cash and cash equivalents	128,379	149,898	3,172	7,144	719	289,312
Trading assets	15,657	-	-	-	-	15,657
Pledged assets	28,303	-	-	-	-	28,303
Derivative assets	14,282	35	-	-	-	14,317
Financial investments	217,917	-	-	-	-	217,917
Asset held for sale	-	-	-	-	-	-
Loans and advances to banks	12,917	2,347	-	-	-	15,264
Loans and advances to customers	195,786	156,475	72	631	1	352,965
Other financial assets	26,045	614	4	2	-	26,665
	639,286	309,369	3,248	7,777	720	960,400
Financial liabilities						
Trading liabilities	5,325	-	-	-	-	5,325
Derivative liabilities	11,753	35	-	-	-	11,788
Deposits and current accounts from banks	53,692	-	-	74	-	53,766
Deposits and current accounts from customers	407,603	157,050	2,308	1,363	349	568,673
Other borrowings	20,849	58,784	-	-	-	79,633
Subordinated debt	15,713	12,251	-	-	-	27,964
Other financial liabilities	48,341	75,236	882	3,251	144	127,854
	563,276	303,356	3,190	4,688	493	875,003
Net on-balance sheet position	76,010	6,013	58	3,089	227	85,397
Off balance sheet	25,009	26,944	228	2,220	742	55,143

Sensitivity analysis

A reasonably possible strengthening (weakening) of the US dollar, GBP or Euro against Naira at period end would have affected the measurement of financial instruments denominated in a foreign currency and affected equity and profit or loss by the amounts shown below. This analysis assumes that all other variables, in particular interest rates, remain constant.

Table 20: Sensitivity Analysis

Effect in N million	Profit or loss		Equity, net of tax	
	Strengthening	Weakening	Strengthening	Weakening
At 30 June 2017				
USD (20% movement)	(13,515)	13,515	(9,460)	9,460
GBP (10% movement)	8	(8)	6	(6)
EUR (5% movement)	78	(78)	55	(55)
At 31 December 2016				
USD (20% movement)	1,203	(1,203)	842	(842)
GBP (10% movement)	6	(6)	4	(4)
EUR (5% movement)	154	(154)	108	(108)



5.4 Market Risk Capital

The Bank currently allocates capital for market risk using the Standardised approach. The table below shows the capital charge and risk weighted asset for Interest rate and Foreign Exchange risk types.

Table 21: Market Risk Capital Charge and Risk Weighted Asset

Risk Type (Numbers are in N'million)	Capital Charge	RWA (12.5 x Capital charge)
Interest Rate (FGN Bond & T-Bills)	900	11,250
Foreign Exchange Risk (Net Open Position)	334	4,175
Total	1,234	15,425



6 Operational Risk

6.1 Overview

Operational risk is defined as the risk of loss resulting from inadequate or failed processes, people and systems (including information technology and infrastructure) or from external events. The definition of operational risk also includes:

- information risk – the risk of unauthorised use, modification or disclosure of information resources;
- fraud risk – the risk of losses resulting from fraudulent activities;
- environmental risk – the risk of inadvertently participating in the destruction of the environment;
- legal risk - the risk that the bank will be exposed to litigation;
- taxation risk – the risk that the bank will incur a financial loss due to incorrect interpretation and application of taxation legislation or due to the impact of new taxation legislation on existing business;
- compliance risk - the risk that the bank does not comply with applicable laws and regulations or supervisory requirements.
- digitization risk - risk exposures arising from rapid rollout of disruptive innovations or new technologies which may have financial, legal, conduct and reputational implications. Digital risk is both a business issue and a technology issue.

6.2 Operational Risk Capital

The Bank currently allocates capital for operational risk using the Basic Indicator Approach (BIA), as prescribed by the Basel Committee and the Central Bank of Nigeria (CBN). According to this approach, the Bank's gross income is treated as a proxy for the institution's overall operational risk exposure and operational risk capital requirement is computed as 15% of the average gross income from the preceding three years.

The computation of operational risk capital requirement as of 30 June 2017 is based on the last three (3) years (2014, 2015, and 2016) gross income data as defined by the guideline.



Table 22: Operational Risk Capital Charge and Risk Weighted Asset

Item	2014	2015	2016
Gross Income N'million	75,337	68,901	90,939
Aggregate gross income N'million		235,178	
Beta Factor		15%	
Gross Income X Beta Factor		35,277	
Number of year with positive annual gross income		3	
Operational Risk Capital Charge		11,759	
Operational Risk Weighted Asset		146,986	



7 List of figures and tables

Figures

Figure 1: SIBTC bank risk management and compliance structure

Figure 2: Loan Classification

Tables

Table 1: SIBTC Bank PLC capital adequacy computation as at 30 June 2017

Table 2: Maximum Exposure to credit risk by credit quality- June 2017

Table 3: Maximum Exposure to credit risk by credit quality- December 2016

Table 4: Ageing of loans and advances past due but not specifically impaired

Table 5: Past dues exposures and impairment by geography

Table 6: Past dues exposures and impairment by industry

Table 7: June 2017 Breakdown by Collateral

Table 8: December 2016 Breakdown by Collateral

Table 9: Breakdown by Geography

Table 10: Breakdown by Industry Sector

Table 11: Breakdown by risk rating

Table 12: Breakdown by Geography

Table 13: Breakdown by Industry Sector

Table 14: Credit Exposure and Risk Weighted Asset as at 30 June 2017

Table 15: Diversified Normal VaR Exposures

Table 16: Analysis of PV01

Table 17: Parallel Rate Shock Result

Table 18: Currency Risk Concentration as at 30 June 2017

Table 19: Currency Risk Concentration as at 31 December 2016

Table 20: Sensitivity Analysis

Table 21: Market Risk Capital Charge and Risk Weighted Asset

Table 22: Operational Risk Capital Charge and Risk Weighted Asset