#### HSBC BANK MALAYSIA BERHAD

(Company No.127776-V)
(Incorporated in Malaysia)
Risk Weighted Capital Adequacy Framework (Basel II) Pillar 3 Disclosures
at 31 December 2012

#### CHIEF EXECUTIVE OFFICER'S ATTESTATION

I, Mukhtar Malik Hussain, being the Chief Executive Officer of HSBC Bank Malaysia Berhad, do hereby state that, in my opinion, the Pillar 3 Disclosures set out on pages 2-27 have been prepared according to the Risk Weighted Capital Adequacy Framework (Basel II), and are accurate and complete.

CHIEF EXECUTIVE OFFICER

Date: 22 February 2013

#### **HSBC BANK MALAYSIA BERHAD**

(Company No.127776-V)

(Incorporated in Malaysia)

Risk Weighted Capital Adequacy Framework (Basel II) Pillar 3 Disclosures at 31 December 2012

#### (a) Introduction

HSBC Bank Malaysia Berhad ("the Bank") is principally engaged in the provision of banking and other related financial services. The subsidiaries of the Bank are principally engaged in the businesses of Islamic Banking and nominee services. Islamic Banking operations refer generally to the acceptance of deposits and granting of financing under the principles of Shariah. The Bank and its subsidiaries are herein referred to as "the Group" in this document.

#### (b) Basel II

The Group's lead regulator, Bank Negara Malaysia ('BNM') sets and monitors capital requirements for the Group as a whole. With effect from 2008, the Group is required to comply with the provisions of the Basel II framework in respect of regulatory capital. The Bank adopts the Standardised approach for Credit, Operational and Market Risk in its trading portfolios. Its fully owned subsidiary, HSBC Amanah Malaysia Berhad, adopts the Standardised approach for Credit and Market Risk in its trading portfolios, and Basic Indicator Approach for Operational Risk.

Basel II is structured around three 'pillars': minimum capital requirements, supervisory review process and market discipline. Pillar 3 aims to encourage market discipline by developing a set of disclosure requirements which allow market participants to assess certain specific information on the capital management processes, and risk assessment processes, and hence the capital adequacy of the Group. Disclosures consist of both quantitative and qualitative information and are provided at the consolidated level. Banks are required to disclose all their material risks as part of the Pillar 3 framework. All material and non-proprietary information required by Pillar 3 is included in the Risk Weighted Capital Adequacy Framework ('Basel II') Pillar 3 Disclosures at 31 December 2012. BNM permits certain Pillar 3 requirements to be satisfied by inclusion within the financial statements. Where this is the case, references are provided to relevant sections in the Financial Statements at 31 December 2012.

#### (c) Consolidation basis

The basis of consolidation for financial accounting purposes is described in Note 3(a) of the financial statements at 31 December 2012 and is similar to that used for regulatory purposes. The Bank's subsidiary companies are listed in Note 14 to the financial statements, and are fully consolidated for both financial accounting and regulatory purposes.

#### (d) Transferability of capital and funds within the Group

The Bank is the primary provider of equity capital to its subsidiaries. Each subsidiary manages its own capital to support its planned business growth. During 2012, none of the Group's subsidiaries were subject to any significant restriction on paying dividends or repaying inter-company loans and advances.

#### (e) Internal assessment of capital adequacy

The Group assesses the adequacy of its capital by considering the resources necessary to cover unexpected losses arising from discretionary risks, such as credit risk and market risk, or non-discretionary risks, such as operational and reputational risk.

The methods to undertake this assessment is contained in the Group's Internal Capital Adequacy Assessment Process ('ICAAP'). This process ensures that the Group's level of capital:

- Remains sufficient to support the Group's risk profile and outstanding commitments;
- Exceeds the Group's formal minimum regulatory requirements;
- Is capable of withstanding a severe economic downturn stress scenario; and
- Remains consistent with the Group's strategic and operational goals, and shareholder and rating agency expectations.

The ICAAP is a comprehensive document designed to evaluate the risk profile, processes for identifying, measuring and controlling risks, capital requirements, capital resources and compliance with standards laid down by BNM. It plays an increasingly crucial role in developing risk-based capital management capabilities, by incorporating different aspects of risk management framework including stress testing and risk appetite.

#### (e) Internal assessment of capital adequacy (Cont'd)

The ICAAP demonstrates the extent to which capital management is embedded in the Group. In particular, the ICAAP demonstrates the extent to which the implications of its capital buffers has been considered on a forward-looking basis by providing the analysis that the Group remains above the minimum Regulatory Capital requirement on a consolidated basis and established monitoring triggers against the Capital Adequacy Ratio.

Refer to Note 37 of the financial statements at 31 December 2012 for the total risk weighted capital ratio and Tier 1 capital ratio, and risk weighted assets and capital requirements for credit risk, market risk and operational risk.

#### **Stress Testing**

Stress testing and scenario analysis form an integral part of ICAAP to demonstrate that the Group can maintain risk capital sufficient enough to sustain operations during an economic downturn. Essentially, stress testing is to make risks more transparent by estimating the potential losses on the exposures under the abnormal market or economic conditions. It will also assess specifically the extent by which risk-weighted assets and capital requirements will increase, and how profit and loss as well as liquidity levels will change. The results of the analyses will facilitate informed financial and capital management whilst supporting business lines to manage their business through various measures such as establishing triggers and devising mitigation actions which can be readily implemented should the adverse scenarios materialise.

Reverse stress testing is a separate but complementary exercise to scenario stress testing. Reverse stress testing requires assessments of scenarios and circumstances that would render the business model unviable, thereby identifying potential business vulnerabilities. It starts from an outcome of business failures and identifies circumstances under which this might occur. This is different from scenario stress testing which tests for outcomes arising from changes in circumstances.

In line with BNM's Guideline on Stress Testing and the Group's Policy Paper for Stress Testing, a Stress Test Steering Committee ('STSC') is established. STSC conducts stress testing on a quarterly basis based on the guidelines and methodology endorsed by the Board. Stress tests are performed for different risk types including credit, liquidity, market and operational risk. The analysis makes use of the actual general ledger, profit and loss and risk positions (the base case) to estimate the impact on profits and risk-weighted assets (the gross impact). It also incorporates the impact of management actions to determine whether or not the Group is able to withstand such an event (the net impact).

#### Risk Appetite

Risk appetite is a central component of an integrated approach to risk, capital and value management and an important mechanism to realise its strategic vision and corporate strategy. Our risk appetite framework aims to introduce a more explicit and consistent consideration of risk and capital into the Group's strategy formulation, business planning, execution and measurement/reporting processes so as to achieve the Group's return on equity ambitions. Risk appetite applies to our planning activities, strategic investments and the running of our operations across all regions, functions and Global Businesses.

The Group's risk appetite framework provides a structured approach to the management, measurement, and control of risks, by explaining the processes, policies, metrics, governance and other features of how to address risk appetite as part of on-going business. Risk appetite forms an integral part of the Group's ICAAP to ensure sufficient capital resources for the risk profile across business lines. The formulation of risk appetite considers risk capacity, financial position, strength of its core earnings and resilience of reputation and brand. It is expressed in both qualitative statements (e.g. describing which risks are taken and why) alongside quantitative measures (e.g. tolerable operational losses).

By incorporating quantitative metrics, the Group is ensuring that:

- Underlying business activity may be guided and controlled so that it continues to be aligned to the risk appetite framework;
- Key assumptions underpinning the risk appetite can be monitored and, as necessary, adjusted through subsequent business plan iterations; and
- Anticipated mitigating business decisions are flagged and acted upon promptly.

#### (f) Capital structure

For regulatory purposes, the Group's regulatory capital is divided into two categories, or tiers. These are Tier 1 and Tier 2. The main features of capital securities issued by the Group are disclosed below:

- Tier 1 capital includes ordinary share capital\*, share premium, capital redemption reserves, retained earnings, statutory reserves and other regulatory adjustments relating to items that are included in equity but are treated differently for capital adequacy purposes. (Refer to Note 37 of the financial statements at 31 December 2012 for the amount of Tier 1 capital and a breakdown of its components).
- \*Refer to Note 24 of the financial statements at 31 December 2012 for further details on ordinary share capital. All ordinary shares in issue confer identical rights in respect of capital, dividends and voting.
- Tier 2 capital includes qualifying subordinated bonds\*\*, collective impairment allowances (excluding collective impairment allowances attributable to loans classified as impaired) and the element of the fair value reserve relating to revaluation of property. (Refer to Note 37 of the financial statements at 31 December 2012 for the amount of Tier 2 capital and a breakdown of its components).
- \*\* Refer to Note 23 of the financial statement at 31 December 2012 for terms and conditions of the subordinated bonds.

#### (g) Risk management policies

All of the Group's activities involve analysis, evaluation, acceptance and management of some degree of risk or combination of risks. The Group has exposure to the following risks from financial instruments:

- credit risk
- liquidity risk
- market risk (includes foreign exchange, interest/profit rate and equity/commodity price risk)
- operational risk

Refer to Note 4 of the financial statements at 31 December 2012 for the Group's risk managements policies on the above mentioned risks.

#### (g) Risk management policies (Cont'd)

#### 1) Credit Risk

Refer to Note 4 b) of the financial statements at 31 December 2012 for definitions of past due and impaired loans. The approaches for the determination of individual and collective impairment provisions are detailed in Note 3 m) of the financial statements at 31 December 2012.

Table 1: Geographical distribution of loans/financing broken down by type

~ -	-		• • •	
31	Decemb	)er	201	12

_			1 December 201	. 2	
Group (RM'000)	Northern	Southern	Central	Eastern	Total
Overdrafts	216,202	153,823	570,180	342,555	1,282,760
Term loans/financing					
Housing loans/financing	3,147,578	2,354,291	8,104,518	994,678	14,601,065
Syndicated term loan/financing	-	-	67,372	-	67,372
Factoring receivables	29,329	14,346	104,515	8,944	157,134
Hire purchase receivables	64,562	56,555	106,971	68,737	296,825
Lease receivables	81	-	3,138	-	3,219
Other term loans/financing	1,915,836	1,665,519	6,393,316	2,479,274	12,453,945
Bills receivable	84,874	193,815	2,577,702	438,302	3,294,693
Trust receipts	168,398	259,792	621,857	179,643	1,229,690
Claims on customers under acceptance credits	849,569	476,807	1,046,424	617,804	2,990,604
Staff loans/financing	45,403	29,192	299,117	27,964	401,676
Credit/charge cards	585,770	402,309	1,594,086	302,178	2,884,343
Revolving credit	164,138	137,922	3,062,094	56,254	3,420,408
Other loans/financing	2,560	3,123	3,522	675	9,880
Less: Unearned income	(19,923)	(19,527)	(70,316)	(11,531)	(121,297)
	7,254,377	5,727,967	24,484,496	5,505,477	42,972,317

31 December 2011 (Restated) [See Note 6]

-			(		
Group (RM'000)	Northern	Southern	Central	Eastern	Total
Overdrafts	220,139	162,826	533,373	341,940	1,258,278
Term loans/financing					
Housing loans/financing	2,877,364	2,009,988	7,450,885	988,041	13,326,278
Syndicated term loan/financing	-	-	77,188	-	77,188
Factoring receivables	33,959	6,816	62,911	3,346	107,032
Hire purchase receivables	46,380	62,821	85,164	64,452	258,817
Lease receivables	166	-	776	-	942
Other term loans/financing	1,909,433	1,764,931	5,543,100	2,124,430	11,341,894
Bills receivable	95,903	210,970	2,344,759	254,705	2,906,337
Trust receipts	319,871	370,650	819,371	120,579	1,630,471
Claims on customers under acceptance credits	962,213	448,592	971,561	898,545	3,280,911
Staff loans/financing	45,104	27,459	304,346	28,364	405,273
Credit/charge cards	615,837	419,787	1,588,247	313,490	2,937,361
Revolving credit	167,670	141,303	2,512,946	52,987	2,874,906
Other loans/financing	2,512	3,220	2,612	813	9,157
Less: Unearned income	(18,892)	(20,174)	(64,288)	(10,844)	(114,198)
	7,277,659	5,609,189	22,232,951	5,180,848	40,300,647

#### (g) Risk management policies (Cont'd)

#### 1) Credit Risk (Cont'd)

Table 2: Geographical distribution of impaired loans/financing broken down by type

**31 December 2012** 

_			I December 201	<b>-</b>	
Group (RM'000)	Northern	Southern	Central	Eastern	Total
Overdrafts	8,315	8,868	7,345	2,571	27,099
Term loans/financing					
Housing loans/financing	67,926	90,660	126,243	10,396	295,225
Factoring receivables	-	86	663	-	749
Hire purchase receivables	4,339	3,847	423	825	9,434
Lease receivables	-	-	-	-	-
Other term loans/financing	67,256	53,422	115,160	53,133	288,971
Bills receivable	281	8,168	90	2,407	10,946
Trust receipts	603	3,613	-	57	4,273
Claims on customers under acceptance credits	7,151	32,214	11,707	7,971	59,043
Staff loans/financing	571	461	4,703	149	5,884
Credit/charge cards	15,657	10,903	36,078	4,954	67,592
Revolving credit	-	-	1,303	-	1,303
Other loans/financing	2,551	3,100	2,001	675	8,327
	174,650	215,342	305,716	83,138	778,846

31 December 2011

_			71 December 201		
Group (RM'000)	Northern	Southern	Central	Eastern	Total
Overdrafts	6,837	6,321	4,990	6,551	24,699
Term loans/financing					
Housing loans/financing	56,317	82,458	95,162	10,132	244,069
Factoring receivables	-	-	-	-	-
Hire purchase receivables	2,525	1,230	656	324	4,735
Lease receivables	-	-	3	-	3
Other term loans/financing	77,473	45,357	139,078	59,831	321,739
Bills receivable	267	8,112	78	2,246	10,703
Trust receipts	448	3,580	1,089	5	5,122
Claims on customers under acceptance credits	16,620	21,387	11,432	5,073	54,512
Staff loans/financing	800	118	5,610	62	6,590
Credit/charge cards	15,831	9,694	27,675	5,576	58,776
Revolving credit	571	-	1,208	-	1,779
Other loans/financing	2,510	3,207	2,150	812	8,679
	180,199	181,464	289,131	90,612	741,406

The Northern region consists of the states of Perlis, Kedah, Penang, Perak, Kelantan, Terengganu and Pahang.

The Southern region consists of the states of Johor, Malacca and Negeri Sembilan.

The Central region consists of the state of Selangor and the Federal Territory of Kuala Lumpur.

The Eastern region consists of the states of Sabah, Sarawak and the Federal Territory of Labuan.

Concentration by location for loans, advances and financing is based on the location of the borrower.

## (g) Risk management policies (Cont'd)

## 1) Credit Risk (Cont'd)

Table 3: Residual contractual maturity of loans/financing broken down by type

**31 December 2012** 

	Maturing within one	One year to	Three years	Over five	
Group (RM'000)	year	three years	to five years	years	Total
Overdrafts	1,282,760	-	-	-	1,282,760
Term loans/financing					
Housing loans/financing	103,411	70,648	186,010	14,240,996	14,601,065
Syndicated term loan/financing	671	66,701	-	-	67,372
Factoring receivables	157,134	-	-	-	157,134
Hire purchase receivables	17,571	108,984	137,602	32,668	296,825
Lease receivables	81	-	3,138	-	3,219
Other term loans/financing	3,421,030	1,623,506	2,185,919	5,223,490	12,453,945
Bills receivable	3,294,693	-	-	-	3,294,693
Trust receipts	1,229,690	-	-	-	1,229,690
Claims on customers under acceptance credits	2,990,604	-	-	-	2,990,604
Staff loans/financing	4,338	15,601	34,756	346,981	401,676
Credit/charge cards	2,884,343	-	-	-	2,884,343
Revolving credit	3,420,408	-	-	-	3,420,408
Other loans/financing	9,880	-	-	-	9,880
Less: Unearned income	(44,898)	(20,113)	(25,252)	(31,034)	(121,297)
	18,771,716	1,865,327	2,522,173	19,813,101	42,972,317

31 December 2011 (Restated) [See Note 6]

	Maturing within one	One year to	Three years to	Over five	
Group (RM'000)	year	three years	five years	years	Total
Overdrafts	1,258,278	-	-	-	1,258,278
Term loans/financing					
Housing loans/financing	98,846	74,255	192,144	12,961,033	13,326,278
Syndicated term loan/financing	-	2,962	74,226	-	77,188
Factoring receivables	107,032	-	-	-	107,032
Hire purchase receivables	16,020	113,218	121,324	8,255	258,817
Lease receivables	841	101	-	-	942
Other term loans/financing	2,790,673	1,479,183	2,711,852	4,360,186	11,341,894
Bills receivable	2,906,337	-	-	-	2,906,337
Trust receipts	1,630,471	-	-	-	1,630,471
Claims on customers under acceptance credits	3,280,911	-	-	-	3,280,911
Staff loans/financing	4,941	18,183	34,880	347,269	405,273
Credit/charge cards	2,937,361	-	-	-	2,937,361
Revolving credit	2,874,906	-	-	-	2,874,906
Other loans/financing	9,157	-	-	-	9,157
Less: Unearned income	(43,048)	(21,501)	(31,777)	(17,872)	(114,198)
	17,872,726	1,666,401	3,102,649	17,658,871	40,300,647

## (g) Risk management policies (Cont'd)

## 1) Credit risk (Cont'd)

Table 4: Distribution of loans/financing by sector, broken down by type

## **31 December 2012** Group (RM'000)

	Overdraft	Housing	Syndicated	Factoring	Hire	Lease	Other term	Bills	Trust	Claims on	Staff loans/	Credit/	Revolving	Other	Unearned	Total
		loans/	term	receivables	purchase	receivables	loans/financing	receivable	receipts	customers	financing	charge card	credit	loans/	income	
		financing	loans/financing		receivables					under				financing		
										acceptances						
										credits						
Agricultural, hunting, forestry and fishing	80,820	-	-	-	4,115	-	1,394,243	389,884	5,631	157,134	-	-	155,758	18	(10,726)	2,176,877
Mining and quarrying	2,986	-	-	510	17,031	-	207,416	72,472	40,907	22,051	-	-	115,171	1	(4,190)	474,355
Manufacturing	345,327	-	-	79,163	134,200	50	2,255,179	821,058	750,172	1,709,765	-	-	966,836	2,005	(26,817)	7,036,938
Electricity, gas and water	5,467	-	-	214	-	-	100,180	1,309	5,812	16,666	-	-	2,000	-	(1,609)	130,039
Construction	57,376	-	-	1,609	19,478	-	1,046,429	33,232	6,010	68,144	-	-	164,508	20	(5,247)	1,391,559
Real estate	21,402	-	-	-	-	-	1,187,492	-	-	196	-	-	580,451	-	(10,207)	1,779,334
Wholesale & retail trade and restaurants & hotels	258,173	-	-	44,423	64,751	-	513,350	377,221	381,539	861,501	-	-	367,105	768	(6,855)	2,861,976
Transport, storage and communication	26,151	-	671	14,623	29,405	-	268,809	5,419	2,318	9,497	-	-	152,630	17	(7,261)	502,279
Finance, insurance/takaful and business services	175,152	-	66,701	16,180	22,266	3,169	794,656	19,564	37,184	83,375	-	-	842,990	31	(6,210)	2,055,058
Household-retail	275,123	14,598,177	-	-	987	-	3,921,255	-	-	-	401,676	2,884,343	2,000	-	(35,907)	22,047,654
Others	34,783	2,888	<u>-</u>	412	4,592	<u> </u>	764,936	1,574,534	117	62,275		<u> </u>	70,959	7,020	(6,268)	2,516,248
	1,282,760	14,601,065	67,372	157,134	296,825	3,219	12,453,945	3,294,693	1,229,690	2,990,604	401,676	2,884,343	3,420,408	9,880	(121,297)	42,972,317

# 31 December 2011 (Restated) [See Note 6] Group (RM'000)

	Overdraft	Housing	Syndicated term	Factoring	Hire	Lease	Other term	Bills	Trust	Claims on	Staff loans/	Credit/	Revolving	Other loans/	Unearned	Total
		loans/	loans/financing	receivables	purchase	receivables	loans/financing	receivable	receipts	customers	financing	charge card	credit	financing	income	
		financing			receivables					under						
										acceptances						
										credits						
Agricultural, hunting, forestry and fishing	76,151	-	-	-	3,470	-	1,021,799	206,077	7,041	184,660	-	-	180,124	-	(6,994)	1,672,328
Mining and quarrying	3,862	-	-	472	15,279	-	285,015	-	43,345	4,435	-	-	115,067	1	(4,204)	463,272
Manufacturing	352,120	-	-	46,305	116,843	670	2,415,439	746,827	987,654	2,007,420	-	-	640,707	8,339	(26,594)	7,295,730
Electricity, gas and water	2,188	-	-	-	731	-	86,550	-	5,621	20,430	-	-	300,718	1	(1,212)	415,027
Construction	74,238	-	-	-	17,690	-	701,376	32,156	4,867	77,860	-	-	195,424	27	(4,015)	1,099,623
Real estate	12,237	-	-	-	-	-	1,150,271	-	2,926	457	-	-	459,592	-	(7,595)	1,617,888
Wholesale & retail trade and restaurants & hotels	217,247	-	-	28,463	38,307	-	429,584	356,957	508,006	789,300	-	-	190,739	742	(5,191)	2,554,154
Transport, storage and communication	37,945	-	2,962	344	20,779	-	436,822	5,929	22,259	12,319	-	-	45,809	1	(9,047)	576,122
Finance, insurance/takaful and business services	124,475	-	74,226	8,681	26,016	272	256,203	401,519	48,537	41,769	-	-	450,975	19	(4,948)	1,427,744
Household-retail	304,644	13,324,730	-	-	17,585	-	3,748,084	-	-	-	405,265	2,937,361	-	-	(36,401)	20,701,268
Others	53,171	1,548	-	22,767	2,117		810,751	1,156,872	215	142,261	8	<u> </u>	295,751	27	(7,997)	2,477,491
	1,258,278	13,326,278	77,188	107,032	258,817	942	11,341,894	2,906,337	1,630,471	3,280,911	405,273	2,937,361	2,874,906	9,157	(114,198)	40,300,647

## (g) Risk management policies (Cont'd)

## 1) Credit risk (Cont'd)

Table 5: Distribution of impaired loans/financing by sector, broken down by type

## 31 December 2012 Group (RM'000)

	Overdraft	Housing	Factoring	Hire	Lease	Other term	Bills	Trust	Claims on	Staff loans/	Credit/	Revolving	Other	Total
		loans/	receivables	purchase	receivables	loans/financing	receivable	receipts	customers	financing	charge card	credit	loans/	
		financing		receivables					under				financing	
									acceptances					
									credits					
Agricultural, hunting, forestry and fishing	334	-	-	84	-	1,049	18	-	-	-	-	-	18	1,503
Mining and quarrying	-	-	-	-	-	-	-	-	-	-	-	-	1	1
Manufacturing	7,850	-	86	6,885	-	58,337	1,510	3,634	32,512	-	-	-	493	111,307
Construction	2,518	-	-	-	-	653	-	52	148	-	-	-	20	3,391
Real estate	-	-	-	-	-	16,222	-	-	-	-	-	-	-	16,222
Wholesale & retail trade and restaurants & hotels	8,880	864	663	1,360	-	569	9,418	587	26,383	-	-	1,303	6,363	56,390
Transport, storage and communication	657	-	-	-	-	5,836	-	-	-	-	-	-	17	6,510
Finance, insurance/takaful and business services	220	-	-	420	-	59	-	-	-	-	-	-	31	730
Household-retail	6,639	294,257	-	685	-	206,215	-	-	-	5,884	67,592	-	-	581,272
Others	1	104	-	-	-	31	-	-	-	-	-	-	1,384	1,520
	27,099	295,225	749	9,434	-	288,971	10,946	4,273	59,043	5,884	67,592	1,303	8,327	778,846

## 31 December 2011 Group (RM'000)

_							Group (N	1 <b>v1</b> 000)						
	Overdraft	Housing	Factoring	Hire	Lease	Other term	Bills	Trust	Claims on	Staff loans/	Credit/	Revolving	Other loans/	Total
		loans/	receivables	purchase	receivables	loans/financing	receivable	receipts	customers	financing	charge card	credit	financing	
		financing		receivables					under					
									acceptances					
									credits					
Agricultural, hunting, forestry and fishing	-	-	-	-	-	863	-	-	-	-	-	-	1	864
Mining and quarrying	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Manufacturing	5,955	-	-	4,083	3	66,054	1,430	4,669	27,413	-	-	-	388	109,995
Construction	112	-	-	-	-	670	-	-	319	-	-	-	27	1,128
Real estate	-	-	-	-	-	87	-	-	-	-	-	-	-	87
Wholesale & retail trade and restaurants & hotels	5,692	-	-	324	-	1,654	9,273	453	26,780	-	-	1,208	8,215	53,599
Transport, storage and communication	4,346	-	-	-	-	4,599	-	-	-	-	-	-	1	8,946
Finance, insurance/takaful and business services	1,442	-	-	-	-	546	-	-	-	-	-	571	19	2,578
Household-retail	7,152	243,951	-	328	-	247,167	-	-	-	6,590	58,776	-	-	563,964
Others	-	118	-	-	-	99	-	-	-	-	-	-	28	245
	24,699	244,069	-	4,735	3	321,739	10,703	5,122	54,512	6,590	58,776	1,779	8,679	741,406

#### (g) Risk management policies (Cont'd)

## 1) Credit Risk (Cont'd)

Table 6: All past due loans/financing broken down by sector *	31 December 2012 Group (RM'000)	31 December 2011 Group (RM'000)
Agricultural, hunting, forestry and fishing	6,631	3,352
Mining and quarrying	4	-
Manufacturing	492,064	425,299
Construction	14,820	4,377
Real estate	70,899	338
Wholesale & retail trade and restaurants & hotels	251,546	207,265
Transport, storage and communication	29,063	34,711
Finance, insurance/takaful and business services	3,500	10,003
Household-retail	2,624,126	2,169,828
Others	6,644	949
	3,499,297	2,856,122
Table 7: All past due loans/financing broken down by geographical location*	31 December 2012	31 December 2011
	Group (RM'000)	Group (RM'000)
Northern region	790,295	693,940
Southern region	963,334	700,314
Central region	1,378,154	1,111,351
Eastern region	367,514	350,517
	3,499,297	2,856,122

<sup>\*</sup> of which the portion of impaired loans broken down by sector and geographical location is disclosed in Note 11 (iii) and 11 (v) of the financial statements at 31 December 2012 respectively.

Table 8: Individual and collective impairment allowance broken down by sector

•	31 Decemb	per 2012	31 December	2011	
			(Restated) [See Note 6]		
	Group (RM'000)		Group (RM'000)		
	<b>Individual</b>	Collective	Individual	Collective	
	impairment	impairment	impairment	impairment	
	allowance	allowance	allowance	allowance	
Agricultural, hunting, forestry and fishing	1,503	9,108	727	6,603	
Mining and quarrying	-	2,539	-	2,107	
Manufacturing	72,343	59,317	48,715	77,929	
Electricity, gas and water	-	5,006	-	5,504	
Construction	65	8,138	8	5,386	
Real estate	15,556	30,266	1,130	21,628	
Wholesale & retail trade and restaurants & hotels	46,841	13,160	39,829	6,254	
Transport, storage and communication	439	5,316	8,601	5,919	
Finance, insurance/takaful and business services	30	3,848	592	2,441	
Household-retail	168,181	239,330	185,919	220,887	
Others	23	25,413	487	21,624	
	304,981	401,441	286,008	376,282	

Table 9: Individual and collective impairment allowance broken down by geographical location

Group (RM'000)  Individual Collective impairment impairment allowance allowance		31 December 2011 (Restated) [See Note 6] Group (RM'000)		
		Individual impairment allowance Restated	Collective impairment allowance Restated	
28,085	74,099	38,299	72,966	
50,136	57,063	34,424	53,539	
191,591	229,453	192,743	206,496	
35,169	40,826	20,542	43,281	
304,981	401,441	286,008	376,282	
	Individual impairment allowance 28,085 50,136 191,591 35,169	Individual impairment allowance impairment allowance allowance  28,085 74,099 50,136 57,063 191,591 229,453 35,169 40,826	Group (RM'000)         Group (RM'0           Individual impairment allowance         Individual impairment allowance         Individual impairment allowance           28,085         74,099         38,299           50,136         57,063         34,424           191,591         229,453         192,743           35,169         40,826         20,542	

### (g) Risk management policies (Cont'd)

## 1) Credit Risk (Cont'd)

Table 10: Charges and write-offs for individual impairment allowance during the year broken down by sector

ğ	31 Decemb	ber 2012	31 December 2011		
			(Restated) [See Note 6] Group (RM'000)		
•	Group (R	(M'000)			
	<b>Individual</b>	Write-off of	Individual	Write-off of	
	impairment	individual	impairment charges	individual	
	charges	impairment		impairment	
Agricultural, hunting, forestry and fishing	1,525	-	5,521	111	
Mining and quarrying	-	-	562	-	
Manufacturing	35,968	4,992	4,518	15,290	
Construction	66	7	13	1,549	
Real estate	1,410	-	8,568	10	
Wholesale & retail trade and restaurants & hotels	8,351	4,549	6,381	10,902	
Transport, storage and communication	618	4,120	74	4,800	
Finance, insurance/takaful and business services	33	34	474	388	
Household-retail	39,619	14,301	25,205	13,833	
Others	18	238	522	-	
•	87,608	28,241	51,838	46,883	

The reconciliation of changes in loan impairment provisions is disclosed in Note 11(ii) of the financial statements at 31 December 2012.

#### (g) Risk management policies (Cont'd)

#### 1) Credit Risk (Cont'd)

#### i) External Credit Assessment Institutions

The Standard Basel II approach requires banks to use risk assessments prepared by External Credit Assessment Institutions ('ECAIs') to determine the risk weightings applied to rated counterparties.

ECAIs are used by the Group as part of the determination of risk weightings for the following classes of exposure:

- Sovereigns and Central Banks
- Multilateral development banks ('MDBs')
- Public sector entities
- Corporates
- Banks
- Securities firms

For the purpose of Pillar 1 reporting to the regulator, the Group uses the external credit ratings from the following ECAIs:

- Standard & Poor's Rating Services (S&P)
- Moody's Investors Services (Moody's)
- Fitch Ratings (Fitch)
- Rating and Investment Information, Inc (R&I)
- RAM Rating Services Berhad (RAM)
- Malaysian Rating Corporation Berhad (MARC)

Data files of external ratings from the nominated ECAIs are matched with the customer records in the Group's centralised credit database. When calculating the risk-weighted value of any exposure under the standardised approach, the customer in question is identified and matched to a rating, according to BNM's selection rules. The relevant risk weight is then derived using the BNM's prescribed risk weights and rating categories mapping as appended below. All other exposure classes are assigned risk weightings as prescribed in the BNM's framework.

#### **Sovereign and Central Banks**

Rating Category	S&P	Moody's	Fitch	R&I*	Risk weight
1	AAA to AA-	Aaa to Aa3	AAA to AA-	AAA to AA-	0%
2	A+ to A-	A1 to A3	A+ to A-	A+ to A-	20%
3	BBB+ to BBB-	Baa1 to Baa3	BBB+ to BBB-	BBB+ to BBB-	50%
4	BB+ to B-	Ba1 to B3	BB+ to B-	BB+ to B-	100%
5	CCC+ to D	Caal to C	CCC+ to D	CCC+ to C	150%
Unrated	-	-	-	-	100%

<sup>\*</sup> External credit assessments produced by R&I on Islamic debt securities are not recognised by the Bank in determining the risk weights for exposures to some asset classes.

## (g) Risk management policies (Con'td)

## 1) Credit Risk (Cont'd)

## i) External Credit Assessment Institutions (Cont'd)

#### **Banking Institutions**

Rating Category	S&P	Moody's	Fitch	R&I	RAM	MARC	Risk weight	Risk weight (original maturity of 6 months or less)	Risk weight (original maturity of 3 months or less)
1	AAA to	Aaa to Aa3		AAA to	AAA to AA3		20%	20%	20%
	AA-		AA-	AA-		AA-			
2	A+ to A-	A1 to A3	A+ to A-	A+ to A-	A1 to A3	A+ to A-	50%	20%	20%
3	BBB+ to	Baa1 to	BBB+ to	BBB+ to	BBB1 to	BBB+ to	50%	20%	20%
	BBB-	Baa3	BBB-	BBB-	BBB3	BBB-			
4	BB+ to B-	Ba1 to B3	BB+ to B-	BB+ to B-	BB1 to B3	BB+ to B-	100%	50%	20%
5	CCC+ to D	Caal to C	CCC+ to D	CCC+ to C	C1 to D	C+ to D	150%	150%	20%
Unrated	-	-	-	-	-	-	50%	20%	20%

#### Corporate

Corporate							
Rating	S&P	Moody's	Fitch	R&I	RAM	MARC	Risk
Category							weight
1	AAA to	Aaa to Aa3	AAA to	AAA to	AAA to AA3	AAA to	20%
	AA-		AA-	AA-		AA-	
2	A+ to A-	A1 to A3	A+ to A-	A+ to A-	A1 to A3	A+ to A-	50%
3	BBB+ to	Baa1 to	BBB+ to	BBB+ to	BBB1 to	BBB+ to	100%
	BB-	Ba3	BB-	BB-	BB3	BB-	
4	B+ to D	B1 to C	B+ to D	B+ to D	B1 to D	B+ to D	150%
Unrated	-	-	-	-	-	-	100%

**Banking Institutions and Corporate (Short term ratings)** 

Rating Category	S&P	Moody's	Fitch	R&I	RAM	MARC	Risk weight
1	A-1	P-1	F1+, F1	a-1+, a-1	P-1	MARC-1	20%
2	A-2	P-2	F2	a-2	P-2	MARC-2	50%
3	A-3	P-3	F3	a-3	P-3	MARC-3	100%
4	Others	Others	B to D	b, c	NP	MARC-4	150%

#### (g) Risk management policies (Cont'd)

## 1) Credit Risk (Cont'd)

## i) External Credit Assessment Institutions (Cont'd)

Risk weights under the standardised approach at the reporting date are reflected under Note 37 of financial statements at 31 December 2012. Rated and unrated exposures according to ratings by ECAIs as at reporting date are as follows:-

## 31 December 2012 Group (RM '000)

•		Ratir	ngs of Corpora	te by Approved	ECAIs	
	S&P	AAA to AA-	A+ to A-	BBB+ to BB-	B1 to D	Unrated
	Moodys	Aaa to Aa3	A1 to A3	Baa1 to Ba3	B1 to C	Unrated
	Fitch	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	Unrated
	RAM	AAA to AA3	A1 to A3	BBB1 to BB3	B1 to D	Unrated
<b>Exposure Class</b>	MARC	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	Unrated
On and Off Balance-Sheet Exposures						
Corporates		955,583	821,973	417,730	_	21,876,655
Total		955,583	821,973	417,730	-	21,876,655

## 31 December 2011 **Group (RM '000)**

Group (III/I 000)						
		Ratir	igs of Corpora	te by Approved	<b>ECAIs</b>	
	S&P	AAA to AA-	A+ to A-	BBB+ to BB-	B1 to D	Unrated
	Moodys	Aaa to Aa3	A1 to A3	Baa1 to Ba3	B1 to C	Unrated
	Fitch	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	Unrated
	RAM	AAA to AA3	A1 to A3	BBB1 to BB3	B1 to D	Unrated
Exposure Class	MARC	AAA to AA-	A+ to A-	BBB+ to BB-	B+ to D	Unrated
On and Off Balance	ce-Sheet Ex	posures				
Corporates		1,301,833	871,641	322,446	-	18,768,357
Total		1,301,833	871,641	322,446	-	18,768,357

## (g) Risk management policies (Cont'd)

- 1) Credit Risk (Cont'd)
- i) External Credit Assessment Institutions (Cont'd)

## 31 December 2012 Group (RM '000)

		Ratings	of Sovereigns a	and Central Ban	ks by Approve	d ECAIs	
	S&P	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated
	Moodys	Aaa to Aa3	A1 to A3	Baa1 to Baa3	Ba1 to B3	Caal to C	Unrated
<b>Exposure Class</b>	Fitch	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated
On and Off Balan	ce-Sheet Ex	posures					
Sovereigns &							
Central Banks		-	22,779,570	-	-	-	972
Total		-	22,779,570	-	-		972

## 31 December 2011 Group (RM '000)

		Ratings	of Sovereigns a	and Central Ban	ks by Approve	d ECAIs	
	S&P	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated
	Moodys	Aaa to Aa3	A1 to A3	Baa1 to Baa3	Ba1 to B3	Caa1 to C	Unrated
Exposure Class	Fitch	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated
On and Off Balan Sovereigns &	 ce-Sheet Ex 	posures					
Central Banks		-	23,173,992	-	-	-	-
Total		-	23,173,992	-	-	-	-

## (g) Risk management policies (Cont'd)

- 1) Credit Risk (Cont'd)
- i) External Credit Assessment Institutions (Cont'd)
- 31 December 2012 Group (RM '000)

		Ratings of Banking Institutions by Approved ECAIs						
	S&P	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated	
	Moodys	Aaa to Aa3	A1 to A3	Baa1 to Baa3	Ba1 to B3	Caa1 to C	Unrated	
	Fitch	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated	
	RAM	AAA to AA3	A1 to A3	BBB1 to BBB3	BB1 to B3	C1 to D	Unrated	
<b>Exposure Class</b>	MARC	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	C+ to D	Unrated	
On and Off Balan	 ce-Sheet Ex 	     						
Banks, MDBs and								
DFIs		5,100,181	3,870,531	1,055,176	114,539	-	1,538,961	
Total		5,100,181	3,870,531	1,055,176	114,539	-	1,538,961	

31 December 2011 Group (RM '000)

Group (revi 000)									
	Ratings of Banking Institutions by Approved ECAIs								
	S&P AAA to AA-		A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated		
	Moodys Aaa to Aa3		A1 to A3	Baa1 to Baa3	Ba1 to B3	Caa1 to C	Unrated		
	Fitch	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	CCC+ to D	Unrated		
	RAM	AAA to AA3	A1 to A3	BBB1 to BBB3	BB1 to B3	C1 to D	Unrated		
Exposure Class	MARC	AAA to AA-	A+ to A-	BBB+ to BBB-	BB+ to B-	C+ to D	Unrated		
On and Off Balan	ce-Sheet Ex	<u>posures</u>							
Banks, MDBs and									
DFIs		7,140,833	3,234,237	1,399,995	131,201	-	3,106,810		
Total		7,140,833	3,234,237	1,399,995	131,201	-	3,106,810		

*Note:* 

MDBs - Multilateral Development Banks DFIs - Development Financial Institutions

#### (g) Risk management policies (Cont'd)

#### 1) Credit Risk (Cont'd)

#### ii) Credit risk mitigation

Financial assets and financial liabilities are offset and the net amount reported in the balance sheet when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously.

The Group's policy when granting credit facilities is on the basis of the customer's capacity to repay, rather than placing primary reliance on credit risk mitigants. Depending on the customer's standing and the type of product, facilities may be provided unsecured. Mitigation of credit risk is nevertheless a key aspect of effective risk management and in the Group, takes many forms. There is no material concentration of credit risk mitigation held.

The Group's general policy is to promote the use of credit risk mitigation, justified by commercial prudence and good practice as well as capital efficiency. Specific, detailed policies cover acceptability, structuring and terms of various types of business with regard to the availability of credit risk mitigants, for example in the form of collateral security, and these policies, together with the determination of suitable valuation parameters, are subject to regular review to ensure that they are supported by empirical evidence and continue to fulfil their intended purpose.

The most common method of mitigating credit risk is to take collateral. The principal collateral types employed by the Group are as follows:

- under the residential and real estate business; mortgages over residential and financed properties;
- under certain Islamic specialised lending and leasing transactions (such as vehicle financing) where physical assets form the principal source of facility repayment, physical collateral is typically taken;
- in the commercial and industrial sectors, charges over business assets such as premises, stock and debtors;
- facilities provided to small and medium enterprises are commonly granted against guarantees by their owners/directors;
- guarantees from third parties can arise where facilities are extended without the benefit of any alternative form of security, e.g. where the Group issues a bid or performance bond in favour of a non-customer at the request of another bank;
- under the institutional sector, certain trading facilities are supported by charges over financial instruments such as cash, debt securities and equities; and
- financial collateral in the form of marketable securities is used in much of the over-the-counter ('OTC') derivatives activities and in the Group's securities financing business (securities lending and borrowing or repos and reverse repos). Netting is used where appropriate, and supported by market standard documentation.

Settlement risk arises in any situation where a payment in cash, securities or equities is made in the expectation of a corresponding receipt of cash, securities or equities. Daily settlement limits are established for counterparties to cover the aggregate of the Group's transactions with each one on any single day. Settlement risk on many transactions, particularly those involving securities and equities, is substantially mitigated by settling through assured payment systems or on a delivery-versus-payment basis.

Policies and procedures govern the protection of the Group's position from the outset of a customer relationship, for instance in requiring standard terms and conditions or specifically agreed documentation permitting the offset of credit balances against debt obligations and through controls over the integrity, current valuation and, if necessary, realisation of collateral security.

#### (g) Risk management policies (Cont'd)

#### 1) Credit Risk (Cont'd)

#### ii) Credit risk mitigation (Cont'd)

The valuation of credit risk mitigants seeks to monitor and ensure that they will continue to provide the secured-repayment source anticipated at the time they were taken. The Group's policy prescribes valuation at intervals of up to two years, or more frequently as the need may arise. For property taken as collateral for new or additional facilities, a valuation report is required from a panel valuer. For auction purposes, full valuations are compulsory. This is to avoid the risk of the settlement sum being challenged by the borrower / charger on the grounds that the correct valuation was not applied.

The Group's panel of approved valuation companies is subject to an annual review. This takes into consideration the company's financial standing, accreditations, experience, professional liability insurance, major clients and size of its branch network.

The table below shows the on and off balance sheet exposures before and after credit risk management.

#### 31 December 2012 Group (RM'000)

Exposure Class	Exposures before CRM	Exposures Covered by Guarantees / Credit Derivatives	Exposures Covered by Eligible Collateral	
Credit Risk				
On-Balance Sheet Exposures				
Sovereigns/Central Banks	22,720,409	_	_	
Banks, Development Financial Institutions & MDBs	8,166,015	-	-	
Corporates	15,885,078	98,049	901,451	
Regulatory Retail	6,546,863	33,821	168,973	
Residential Mortgages	20,642,248	-	24,753	
Higher Risk Assets	1,355	-	-	
Other Assets	1,173,241	-	-	
Equity Exposure	16,908	-	-	
Defaulted Exposures	553,338	955	8,761	
Total for On-Balance Sheet Exposures	75,705,455	132,825	1,103,938	
Off-Balance Sheet Exposures				
OTC Derivatives	3,732,755	_	_	
Off balance sheet exposures other than OTC derivatives or	10,129,262	198,780	221,676	
credit derivatives			Ź	
Defaulted Exposures	126,723	4,817	12,000	
Total for Off-Balance Sheet Exposures	13,988,740	203,597	233,676	
Total On and Off-Balance Sheet Exposures	89,694,195	336,422	1,337,614	

#### (g) Risk management policies (Cont'd)

## 1) Credit Risk (Cont'd)

#### ii) Credit risk mitigation (Cont'd)

The table below shows on and off balance sheet exposures before and after credit risk management.

## 31 December 2011 Group (RM'000)

Exposure Class	Exposures before CRM	Exposures Covered by Guarantees / Credit Derivatives	Exposures Covered by Eligible Collateral	
Credit Risk	Restated		Restated	
On-Balance Sheet Exposures				
Sovereigns/Central Banks	23,166,889	_		
Banks, Development Financial Institutions & MDBs	11,223,050	_	_	
Corporates	15,066,894	278,157	537,331	
Regulatory Retail	7,586,318	57,907	166,014	
Residential Mortgages	18,127,381	<i>31,501</i>	25,357	
Higher Risk Assets	1,508	_	-	
Other Assets	1,070,708	_	_	
Equity Exposure	16,908	-	_	
Defaulted Exposures	532,513	611	6,081	
<b>Total for On-Balance Sheet Exposures</b>	76,792,169	336,675	734,783	
Off-Balance Sheet Exposures				
OTC Derivatives	3,676,729	-	-	
Off balance sheet exposures other than OTC derivatives or	8,324,274	201,921	187,770	
credit derivatives				
Defaulted Exposures	58,409	1,502	1,609	
<b>Total for Off-Balance Sheet Exposures</b>	12,059,412	203,423	189,379	
<b>Total On and Off-Balance Sheet Exposures</b>	88,851,581	540,098	924,162	

Refer to Note 38 of the financial statements at 31 December 2012 for disclosure of off-balance sheet and counterparty credit risk.

#### (g) Risk management policies (Cont'd)

#### 1) Credit Risk (Cont'd)

#### iii) Counterparty Credit Risk

In respect of counterparty credit risk exposures which arise from OTC derivative transactions, repo-style transactions and credit derivative contracts, a credit limit for counterparty credit risk ('CCR') arising from the relevant transaction is assigned, monitored and reported in accordance with the Group risk methodology. The credit limit established takes into account the gross contract amount and the future potential exposure measured on the basis of 95 percentile potential worst case loss estimates for the product involved. These methods of calculating credit exposures apply to all counterparties and differences in credit quality are reflected in the size of the limits.

The credit equivalent amount and risk-weighted amount of the relevant transaction is determined following the regulatory capital requirements. The risk-weighted amount is calculated in accordance with the counterparty risk weighting as per the standardised approach.

The policy for secured collateral on derivatives is guided by the Group's Internal Best Practice Guidelines ensuring the due diligence necessary to fully understand the effectiveness of netting and collateralisation by jurisdiction, counterparty, product and agreement type is fully assessed and that the due-diligence standards are high and consistently applied.

#### (g) Risk management policies (Cont'd)

### 1) Credit Risk (Cont'd)

#### iii) Counterparty Credit Risk (Cont'd)

The table below discloses the gross and net exposures, risk weighted assets ('RWAs') and capital requirements for credit risk, market risk, large exposures risk and operational risk of the Group as at balance sheet date. The following disclosure requirement came into effect in 2008 with the adoption of the Basel II Standardised Approach under the Risk Weighted Capital Adequacy Framework ('RWCAF').

At the reporting date, the RWA risk absorbent profit sharing investment account in the Bank amounted to RM632,121,000. Both the principal amount and risk weighted asset are the same. This amount is reported as asset under management in the books of the Bank's Islamic Subsidiary. At the group level, the effect of the RWA risk absorbent profit sharing investment is eliminated.

31 December 2012 Group

Group (RM'000)							
Exposure Class		Gross Exposures	Net Exposures	Risk Weighted Assets (RWA)	RWA Absorbed by PSIA	Total RWA after PSIA	Capital Requirement
<u>Credit Risk</u>							
On-Balance Sheet Exposures							
Sovereigns/Central Banks		22,720,409	22,720,409	-	-	-	-
Banks, Development Financial Institutions &							
MDBs		8,166,015	8,166,015	1,703,967	-	1,703,967	136,317
Corporates		15,885,078	14,983,627	14,336,035	-	14,336,035	1,146,883
Regulatory Retail		6,546,863	6,377,890	4,843,700	-	4,843,700	387,496
Residential Mortgages		20,642,248	20,617,495	8,522,558	-	8,522,558	681,805
Higher Risk Assets		1,355	1,355	2,032	-	2,032	163
Other Assets		1,173,241	1,173,241	847,805	-	847,805	67,824
Equity Exposure		16,908	16,908	16,908	-	16,908	1,353
Defaulted Exposures		553,338	544,577	637,646	-	637,646	51,012
<b>Total for On-Balance Sheet Exposures</b>		75,705,455	74,601,517	30,910,651	-	30,910,651	2,472,853
Off-Balance Sheet Exposures							
OTC Derivatives		3,732,755	3,732,755	1,856,647	_	1,856,647	148,532
Off balance sheet exposures other than OTC		, ,	, ,	, ,		, ,	,
derivatives or credit derivatives		10,129,262	9,907,586	8,462,623	-	8,462,623	677,010
Defaulted Exposures		126,723	114,723	166,860	_	166,860	13,349
Total for Off-Balance Sheet Exposures		13,988,740	13,755,064	10,486,130	-	10,486,130	838,891
Total On and Off-Balance Sheet Exposures		89,694,195	88,356,581	41,396,781	-	41,396,781	3,311,744
Large Exposures Risk Requirement		-	-	-	-	-	-
Market Risk	<b>Long Position</b>	<b>Short Position</b>					
Interest/Profit Rate Risk	72,969,146	69,431,362	3,537,784	1,553,969	_	1,553,969	124,318
Foreign Currency Risk	48,218	45,089	54,636	54,636	_	54,636	4,371
Option Risk	-0,210	-	3 <del>1,030</del>	19,550	_	19,550	1,564
opnon ruon	73,017,364	69,476,451	3,592,420	1,628,155	-	1,628,155	130,253
Operational Risk	-	-	-	5,211,149	-	5,211,149	416,892
Total RWA and Capital Requirement				48,236,085		48,236,085	3,858,889
i otai K vv A anu Capitai Kequirement	_	_	_	40,230,005		70,230,003	3,030,009

#### (g) Risk management policies (Cont'd)

### 1) Credit Risk (Cont'd)

#### iii) Counterparty Credit Risk (Cont'd)

The table below discloses the gross and net exposures, risk weighted assets and capital requirements for credit risk, market risk, large exposures risk and operational risk of the Group as at balance sheet date. The following disclosure requirement came into effect in 2008 with the adoption of the Basel II Standardised Approach under the RWCAF.

31 December 2011	Group						
Group (RM'000)  Exposure Class		Gross Exposures	Net Exposures	Risk Weighted Assets (RWA)	RWA Absorbed by PSIA	Total RWA after PSIA	Capital Requirement
Credit Risk		Restated	Restated	Restated			Restated
On-Balance Sheet Exposures							
Sovereigns/Central Banks		23,166,889	23,166,889	-	-	-	-
Banks, Development Financial Institutions &							
MDBs		11,223,050	11,223,050	2,258,367	-	2,258,367	180,669
Corporates		15,066,894	14,529,563	13,591,682	-	13,591,682	1,087,33
Regulatory Retail		7,586,318	7,420,304	5,567,574	-	5,567,574	445,400
Residential Mortgages		18,127,381	18,102,024	7,534,401	-	7,534,401	602,752
Higher Risk Assets		1,508	1,508	2,261	-	2,261	18
Other Assets		1,070,708	1,070,708	772,032	-	772,032	61,76
Equity Exposure		16,908	16,908	16,908	-	16,908	1,35
Defaulted Exposures		532,513	526,432	626,104	-	626,104	50,08
Total for On-Balance Sheet Exposures		76,792,169	76,057,386	30,369,329	-	30,369,329	2,429,547
Off-Balance Sheet Exposures							
OTC Derivatives		3,676,729	3,676,729	1,910,874	-	1,910,874	152,870
Off balance sheet exposures other than OTC							
derivatives or credit derivatives		8,324,274	8,136,504	6,364,521	-	6,364,521	509,162
Defaulted Exposures		58,409	56,800	83,539	-	83,539	6,683
Total for Off-Balance Sheet Exposures		12,059,412	11,870,033	8,358,934	-	8,358,934	668,71
Total On and Off-Balance Sheet Exposures		88,851,581	87,927,419	38,728,263	-	38,728,263	3,098,262
Large Exposures Risk Requirement		-	-	-	-	-	-
Market Risk	Long Position	Short Position					
Interest/Profit Rate Risk	75,526,424	68,838,723	6,687,700	2,315,183	_	2,315,183	185,213
Foreign Currency Risk	39,016	47,305	42,150	47,324	_	47,324	3,786
Option Risk	-	-	_	259,650	_	259,650	20,772
-	75,565,440	68,886,028	6,729,850	2,622,157	-	2,622,157	209,77
Operational Risk	-	-	-	4,680,548	-	4,680,548	374,444
Total RWA and Capital Requirement	-	-	-	46,030,968		46,030,968	3,682,479

## *Note:*

MDBs - Multilateral Development Banks

OTC - Over the counter

Rer to Note 38 of the financial statements at 31 December 2012 for disclosure of off-balance sheet and counterparty credit risk.

### (g) Risk management policies (Cont'd)

#### 1) Credit Risk (Cont'd)

#### iii) Counterparty Credit Risk (Cont'd)

The below are disclosures on credit risk by risk weights of the Group as at balance sheet date. The following disclosure requirement came into effect in 2008 with the adoption of the Basel II Standardised Approach under the RWCAF.

**31 December 2012** Group Group (RM'000) **Exposures after Netting and Credit Risk Mitigation Total** Exposures after **Total Risk** Risk Sovereigns & Higher Banks, MDBs and **Netting &** Regulatory Residental Corporates Weights Central Risk Other Assets **Equity** Weighted Assets **Credit Risk DFIs** Retail Mortgages **Banks Assets** Mitigation 22,780,542 21,116 0% 23,775 325,436 23,150,869 20% 914,520 20,626 10,796,632 2,159,326 9,861,486 16,252,048 35% 5,688,217 16,252,048 50% 4,131,800 2,065,900 1,788,442 561,439 22,362 1,759,557 75% 8,089,538 2,703,836 10,793,374 8,095,032 22,918,959 100% 8,307 21,392,378 437,160 216,401 847,805 16,908 22,918,959 150% 120,144 168,328 469,347 21,153 1,811 1,463 312,899 Total Risk Weight 88,356,581 41,396,781 Average Risk Weight 4,908,699 2,299,821 Deduction from Capital Base

31 December 2011	Group									
Group (RM'000)									1	T
		Exp	_							
Risk Weights	Sovereigns & Central Banks	Banks, MDBs and DFIs	Corporates	Regulatory Retail	Residental Mortgages	Higher Risk Assets	Other Assets	Equity	Total Exposures after Netting & Credit Risk Mitigation	Total Risk Weighted Assets
0%	23,173,992	-	3,062	17,101	-	-	298,676	-	23,492,831	-
20%	-	13,554,193	1,351,050	49,353	-	-	-	-	14,954,596	2,990,919
35%	-	-	-	-	13,922,407	-	-	-	13,922,407	4,872,843
50%	-	1,395,364	553,009	8,018	1,892,926	-	-	-	3,849,317	1,924,658
75%	-	-	1,785	9,259,224	2,337,030	-	-	-	11,598,039	8,698,530
100%	-	318	18,610,915	239,923	207,966	-	772,032	16,908	19,848,062	19,848,062
150%	-	3,201	86,053	171,060	301	1,552	-	-	262,167	393,251
Total Risk Weight	-	-	-	-	-	-	-	-	87,927,419	38,728,263
Average Risk Weight	-	-	-	-	-	-	-	-	4,884,857	2,151,570
Deduction from Capital Base	_		_	_		_	_	_	_	

*Note:* 

MDBs - Multilateral Development Banks DFIs - Development Financial Institutions

#### (g) Risk management policies (Cont'd)

#### 2) Collateral Arrangements

To calculate counterparty's net risk position for counterparty credit risk, the Group revalue all financial instruments and associated collateral positions on a daily basis. A dedicated Collateral Management function independently monitors counterparties' associated collateral positions and manages a process which ensures that calls for collateral top-ups or exposure reductions are made promptly. Processes exist for the resolution of situations where the level of collateral is disputed or the collateral sought is not received.

Eligible collateral types are documented by Credit Support Annexes ('CSA') of the International Swaps and Derivatives Association ('ISDA') Master Agreement and are controlled under a policy which ensures the collateral agreed to be taken exhibits characteristics such as price transparency, price stability, liquidity, enforceability, independence, reusability and eligibility for regulatory purposes. A valuation 'haircut' policy reflects the fact that collateral may fall in value between the date the collateral was called and the date of liquidation or enforcement. In practice, at least 95 percent of collateral held as credit risk mitigants under CSAs is either cash or government securities.

#### 3) Credit Ratings Downgrade

It has increasingly become the practice for market participants to employ external credit ratings-based within counterparty documentation as a form of risk control. Industry standard market agreements such as the ISDA Master Agreement allow for the inclusion of such clauses within the definition of "materially weaker" in the Credit Event Upon Merger and Additional Termination Event Clauses. These clauses are designed to trigger a series of events which may include the termination of transactions by the non-affected party, or assignment by the affected party, or the requirement to post collateral by the affected party if the credit rating of the affected party falls below a specified level.

Ratings-based clauses against the Group are resisted wherever possible due to the liquidity, replacement cost and a market visibility risk that may arise if such a clause is triggered. The prior approval of Regional - Global Market, Wholesale Credit Risk and Group Risk - Wholesale Credit and Market Risk are obtained if such ratings-based clauses are included in an agreement.

#### 4) Equities

At 31 December 2012, the Group does not hold any quoted shares. The Group's holding of unquoted shares at 31 December 2012 was mainly of shares held for socio-economic reasons. The unquoted shares portfolio consisted primarily of Credit Guarantee Corporation, Cagamas Holdings and Global Maritime Ventures shares. The Group's policy on valuation and accounting of equity holdings is disclosed in Note 3 k(ii) of the financial statements at 31 December 2012.

#### Quoted equities

Quoted shares are not held for capital gains.

#### **Unquoted** equities

These shares are not held for capital gains and are recorded at cost due to the lack of quoted prices in an active market or /and the fair values of the equities cannot be reliably measured. The unquoted equities were classified under the non-institutional segment and risk weighted at 100%.

Refer to Note 9 of the financial statements at 31 December 2012 for further information on the Group's holdings of equity investments.

#### (g) Risk management policies (Cont'd)

#### 5) Interest rate risk / rate of return risk

Qualitative and quantitative information on interest rate risk / rate of return risk in the banking book is presented in Note 4 d) of the financial statements at 31 December 2012.

#### 6) Restatement of comparative figures

Comparative figures for Table 1, 3, 4, 8, 9 and 10 have been restated/reclassified to conform to current year's presentation upon the adoption of the Malaysian Financial Reporting Standards ('MFRS') framework issued by the Malaysian Accounting Standards Board ('MASB') with effect from 1 January 2012. Refer to the Risk Weighted Capital Adequacy Framework (Basel II) Pillar 3 Disclosures at 31 December 2011 for the comparative figures prior to restatement. Details of the current year restatements made can be found in Note 45 of the financial statements at 31 December 2012.

#### (g) Risk management policies (Cont'd)

#### 7) Shariah Governance

#### Overview

Shariah compliance is a cornerstone of Islamic banking and finance industry. An effective Shariah governance policy enhances the diligent oversight of the Board of Directors, the Shariah Committee and the Management to ensure that the operations and business activities of the HSBC Amanah Malaysia Berhad ('HBMS'), a fully owned Islamic subsidiary of the Bank, remain consistent with Shariah principles and its requirements.

To ensure Shariah compliance in all aspects of day-to-day Islamic finance activities, the Malaysian regulatory bodies such as BNM and Securities Commission have spelled out several provisions in relation to the establishment of a Shariah Committee and an internal Shariah Department in an Islamic Financial Institution (IFI). The Shariah Committee is an independent Shariah advisory body which plays a vital role in providing Shariah views and rulings pertaining to Islamic finance. The Shariah Committee also acts as a monitoring body to maintain Shariah compliance in the operations and business activities of the IFI. At the institutional level, the Shariah Department acts as an intermediary between the Shariah Committee and the Management team of the IFI. The Shariah Department together with the Shariah Committee has the role to assist the Management in ensuring that all activities of the IFI are in compliance with the Shariah rules and principles, in accordance with the guidelines laid down by Shariah Governance Framework ('SGF') of BNM. However, the accountability to ensure Shariah compliance remains with the IFI's Board of Directors.

## **Qualitative Disclosures - Key Components and Core Shariah Functions in Implementing and Monitoring the Shariah Governance Practices as per SGF**

The governance structure of HBMS and the primary responsibilities of each function are set out below:

#### a. Board of Directors

To be ultimately accountable for the overall Shariah governance and compliance in HBMS.

#### **b. Shariah Committee**

To maintain an oversight on the operations and business activities of HBMS and to be accountable for its decisions, views and opinions on Shariah matters.

#### c. CEO and Management

To be responsible in day-to-day compliance with Shariah in all aspects of its business activities by observing and implementing the Shariah rulings and decisions made by the Shariah Advisory Council of BNM and the Shariah Committee and to identify and refer any Shariah issues to the Shariah Committee for its decisions, views and opinions.

#### d. Shariah Audit

To conduct periodical assessment to provide an independent assessment and objective assurance of the effectiveness on the internal control system for Shariah compliance.

#### e. Shariah Department

#### 1. Shariah Review

To regularly review the operations and business activities of HBMS in compliance with the Shariah requirements.

To ensure that all procedural guidelines, rules and regulations issued by BNM and other regulatory bodies relating to Shariah as well as internal guidelines, policies and procedures, manuals and all Shariah rules and principles issued by the Shariah Committee and Shariah Department are adhered to, with due regard to the business needs and Shariah requirements.

#### 2. Shariah Advisory & Business Development

To provide day-to-day Shariah advice and consultancy to relevant parties, including those involved in the product development process as well as the supporting functions.

#### (g) Risk management policies (Cont'd)

#### 7) Shariah Governance (Cont'd)

Qualitative Disclosures - Key Components and Core Shariah Functions in Implementing and Monitoring the Shariah Governance Practices as per SGF (Cont'd)

#### e. Shariah Department (Cont'd)

#### 3. Shariah Research

To conduct in-depth research and studies on Shariah issues.

#### 4. Shariah Training

To provide day-to-day Shariah advice and consultancy to relevant parties, including those involved in the product development process as well as the supporting functions.

#### 5. Shariah Secretariat

To coordinate meetings, compile proposal papers, prepare and keep accurate record of minutes of the decisions and resolutions made by the Shariah Committee, disseminate Shariah decisions to relevant stakeholders and engage with relevant parties who wish to seek further deliberations from the Shariah Committee.

#### **Quantitative Disclosure**

During the financial year ended 31 December 2012, the following events occurred:

- (i) Interest income amounting to RM3.0 million have been inadvertently booked in HBMS's book. This has been rectified by reversing the entire interest income (approximately RM3 million) as well as the relevant impairment charges from HBMS's book and rebooking them into HSBC Bank Malaysia Berhad's book.
- (ii) Excess compensation received amounting to RM70,000 has been reversed to a Charity Funds account and has been donated to charity.
- (iii) Income from inadvertent Shariah non-compliant activities identified by HBMS's management amounting to RM32,000 has been reversed to a Charity Funds account pending distribution in 2013.

Other than the above, there were no other Shariah non-compliant income or event which occurred during the financial year ended 31 December 2012.