punjab national bank (International) Limited

Pillar III Disclosures

For the year ended 31st March 2024

Contents

1. Overview

1.1 Background

Punjab National Bank (International) Limited (‘the Bank’ or ‘PNBIL’) is a UK incorporated, wholly owned subsidiary of Punjab National Bank, India. The Bank is authorised by the Prudential Regulation Authority (‘PRA’) and regulated by the Financial Conduct Authority (‘FCA’) and the PRA. The Bank started its UK operations in May 2007 and currently operates in the United Kingdom through a network of seven branches. All branches focus on retail and business clients. The central London branch also manages the existing corporate portfolio of the Bank.

This document details the Pillar 3 disclosure requirements and is in addition to the consolidated Pillar 3 disclosures made by Punjab National Bank Limited (‘the Parent Bank’ or ‘Parent’).

1.2 Basis of disclosure

The Pillar 3 Disclosure requirements are documented in the Capital Requirements Regulation (‘CRR’) and Capital Requirements Directive (‘CRD’), which first came into effect on 1 January 2014, and in a number of other EU regulations and guidelines. In the UK, the CRR and other regulations have been incorporated into UK law. With effect from 1 January 2022, the PRA introduced a single source of disclosure requirements under the PRA Capital Requirements Regulation. These UK standards are being closely aligned with the global Basel Committee of Banking Supervision (‘BCBS’) standards and the European CRR standards.

The Bank’s Pillar 3 disclosures comply with PRA’s disclosure requirements, specifically part eight of the CRR which sets out the minimum disclosure requirements. In accordance with Article 432 of the CRR, the Bank is permitted to exclude certain disclosures if they contain proprietary information or are non-material. Where the Bank is required to disclose fixed format templates, and either a row or column is not applicable to PNBIL, these have been omitted. Further, where rows are empty sets in the UK templates, these have also been omitted.

The Pillar 3 disclosures have been prepared for explaining the basis on which the Bank has prepared and disclosed certain capital requirements and information about the management of certain risks. These disclosures are intended to convey the Bank’s risk profile comprehensively to market participants.

The Bank meets the definition of a non-listed ‘Other institution’ and is therefore subject to proportional disclosure requirements in accordance with Article 433c of the Disclosure (CRR) Part of the PRA Rulebook, a summary of applicable disclosures can be found in Appendix 10. Some of the information required to be declared as part of the Pillar 3 disclosures is discussed in various notes to the financial statements, and in the Directors’ and Strategic Reports in the Annual Report and Financial Statements 2024 (‘Annual Report’). This report should be read in conjunction with the Annual Report for completeness of the required disclosures.

1.3 Scope of Application

The Pillar 3 disclosures have been prepared for the Bank as per the rules laid out in the UK CRR and CRD, as adopted by the PRA into UK law. The Bank is a full CRD compliant firm and its accounting and disclosures are on a solo basis. There is no subsidiary/joint venture of the firm that is required to be consolidated for accounting or prudential purposes. However, its parent, Punjab National Bank ('PNB'), has to consolidate financial statements, capital adequacy and other information required for accounting, prudential and market disclosure purposes, and reports the same to its regulators and market participants on a consolidated basis.

1.4 Frequency and Location

The Bank's Pillar 3 disclosures are made on an annual basis. The disclosures are made as at 31st March ('Accounting Reference Date') and will be published alongside the Annual Report.

The Pillar 3 disclosures and the Annual Report are published on the Bank's corporate website (www.pnbint.com).

1.5 Currency

The Pillar 3 disclosures are presented in US Dollars as this is the functional currency of the Bank.

1.6 Verification and Supervision

These disclosures have been prepared with inputs from the Finance, Risk, Legal and HR teams. These disclosures have been reviewed at executive committee level and approved by the Board of Directors ('Board').

The Board considered that, as at 31st March 2024, it had in place adequate systems and controls with regards to the Bank's risk profile and strategy.

1.7 Attestation

The Directors of the Bank confirm that these disclosures meet the minimum requirements for Pillar 3 disclosures laid out in the UK CRR and are prepared in accordance with the Bank's internal controls processes.

1.8 Board of Directors

The Board of Directors is ultimately responsible for the effectiveness of the Bank's risk management framework. The Board is committed to maintaining high standards of corporate governance in the Bank.

The Board incorporates a wide range of experience and diversity to ensure that the appropriate level of expertise and knowledge is applied to the Bank's management. The Board consists of a total of six members. These include two non-executive directors from the Parent Bank and two independent non-executive directors. The following table shows the Board composition and the number of directorships held by the Board of Directors as at 31st March 2024:

Position	Directors	Number of Directorships
Chairman	Atul Kumar Goel	11
Managing Director	Ritesh Mishra	1
Executive Director	Vasudevan Mundokulam	1
General Manager Non-Executive Director	Prabhat Ranjan Pradhan	1
Independent Non-Executive Director	Sundeep Bhandari	5
Independent Non-Executive Director	Adrian John Stirrup	2

Further details on the experience and expertise of the Board members can be found on our website www.pnbint.com

1.9 UK KM1 – Key metrics template

$ million		2024	2023
	Available own funds (amounts)		
1	Common equity tier 1 (CET 1) capital	144.1	143.1
2	Tier 1 capital	189.1	188.1
3	Total capital	223.1	226.4
	Risk-weighted exposure amounts		
4	Total risk-weighted exposure amount	701.0	730.1
	Capital ratios (as a percentage of risk-weighted exposure amount)		
5	Common Equity Tier 1 ratio (%)	20.6%	19.6%
6	Tier 1 ratio (%)	27.0%	25.8%
7	Total capital ratio (%)	31.8%	31.0%
	Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)		
UK 7a	Additional CET1 SREP requirements (%)	1.9%	1.9%
UK 7b	Additional AT1 SREP requirements (%)	0.6%	0.6%
UK 7c	Additional T2 SREP requirements (%)	0.8%	0.8%
UK 7d	Total SREP own funds requirements (%)	11.4%	11.4%
	Combined buffer requirement (as a percentage of risk-weighted exposure amount)		
8	Capital conservation buffer (%)	2.5%	2.5%
UK 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-
9	Institution specific countercyclical capital buffer (%)	1.4%	0.7%

UK 9a	Systemic risk buffer (%)	-	-
10	Global Systemically Important Institution buffer (%)	-	-
UK 10a	Other Systemically Important Institution buffer	-	-
11	Combined buffer requirement (%)	3.9%	3.1%
UK 11a	Overall capital requirements (%)	15.3%	14.5%
12	CET1 available after meeting the total SREP own funds requirements (%)	14.2%	13.2%
	Leverage ratio		
13	Total exposure measure excluding claims on central banks	987.7	942.9
14	Leverage ratio excluding claims on central banks (%)	19.1%	19.9%
	Liquidity Coverage Ratio		
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	146.5	166.1
UK 16a	Cash outflows - Total weighted value	62.1	73.8
UK 16b	Cash inflows - Total weighted value	39.4	30.6
16	Total net cash outflows (adjusted value)	22.6	43.2
17	Liquidity coverage ratio (%)	647%	384%
	Net Stable Funding Ratio		
18	Total available stable funding	801.2	819.1
19	Total required stable funding	618.8	613.3
20	NSFR ratio (%)	130%	135%

The LCR in the above table is calculated using the relevant balances which are calculated using the simple average of month end balances from April 2023 to March 2024.

2.Risk Management and Governance

2.1 Risk Management

PNBIL follows a three lines of defence model in the management of Risk, with the first line consisting of the business areas where risk arises and that are accountable for its control. These areas are primarily responsible for identifying, assessing, and mitigating risks within their respective operations. Second line is represented by the Risk Management Department ('RMD'). The RMD acts as an independent oversight function, providing advice, guidance, and support to the first line. This includes developing risk management frameworks, policies, and procedures, as well as conducting independent assessments and reviews to ensure that risks are effectively managed. Third line is represented by the Bank's Internal Audit department.

The risk management function is managed by the Chief Risk Officer ('CRO') who reports directly to the Managing Director ('MD') / Chief Executive Officer ('CEO') and also has a reporting line to the Bank's Chairman of the Board Risk Committee ('BRC').

Bank-wide Risk Management is designed to help PNBIL enhance value through a holistic approach to the identification, assessment, mitigation, monitoring and reporting of the Bank's risk portfolio. The Bank's approach to holistic risk management as defined above is set out within the Risk Governance Framework ('RGF') of the Bank. The RMD is responsible for the application of the RGF across the Bank, and in ensuring appropriate risk identification, control and monitoring are in place to ensure that the Bank's risk profile is managed in compliance with the Board approved risk appetite limits.

These are reported to the Board through various executive committees and Board sub committees. During the financial year 2023-24, there has been no change in the heads of business, risk management, compliance or audit.

As part of its annual risk assessment under ICAAP, key material risks faced by the Bank are identified and assessed to ensure that the residual risk post implementation of controls & mitigants is within PNBIL's appetite. The risks are regularly monitored through various tools and frameworks such as Key Risk Indicator ('KRI'), Material Risk Trend Register ('MRTR'), Risk Appetite Dashboard and are presented to management for oversight. The material risks identified by the Bank are disclosed in its annual report along with its mitigants. As on 31st March 2024, the Total Capital Ratio is 32.8% indicating adequacy of capital, the Leverage Ratio is 19.1% indicating healthy capital mix, the Liquidity Coverage Ratio is 647.1% indicating sufficient HQLA to meet its outflows over next 30 days and Net Stable Funding Ratio is 129.5% showing sufficiency of stable funding.

The Bank is a 100% owned subsidiary of PNB, India. PNB India provides core IT and infrastructure support to PNBIL, the relationship is governed through an up-to-date service level agreement ('SLA') in accordance with Outsourcing and Third-Party Risk management policy of the Bank. PNBIL is powered by the PNB brand and it also partners with PNB to provide INR remittance services to its customers. PNBIL maintains an arm's length relationship with the parent (including all its branches in India and abroad) as well as its associates and joint ventures. All the outsourcing arrangements are governed by the Board approved Outsourcing and Third-Party Risk Management Policy of the Bank.

In compliance with Article 435(1)(e) of CRR, PNBIL's Board confirms that its risk management system is adequate in view of its scale and size of operations to manage the risk perceived by the Bank in meeting its business strategy.

Capital Adequacy

The Board ensures that its capital adequacy is higher than the regulatory requirements. It wishes to maintain a capital buffer and aims to operate at 110% of minimum regulatory requirements. The capital buffers can be utilized during a period of stress, but PNBIL has no appetite for going below the minimum hurdle rate as per the thresholds identified in the Recovery Plan. The Board keeps an oversight over the quality and quantity of capital through Common Equity Tier 1 ('CET 1'), Tier 1, Total Capital Ratio ('TCR') and the Leverage ratio. The Bank's strategy is to target secured and low risk weighted assets through real estate loans underwriting and maintaining a sufficient margin in line with Bank's risk appetite.

In addition to Pillar 1 capital requirement and capital buffers, PNBIL independently assesses additional capital requirements for various material risks perceived by the Bank in its due course of business and keeps additional capital where required.

Stress Testing

Stress testing is an important risk management tool, with specific approaches documented for the Bank's key annual assessments including the ICAAP, Individual Liquidity Adequacy Assessment Process ("ILAAP"), the Recovery Plan. PNBIL annually assesses its capital and liquidity adequacy as part of its ICAAP & ILAAP assessments. The material risks faced by the Bank are annually identified and assessed against the controls and mitigants for containing them within the Bank's appetite. Where required, additional capital under Pillar 2 is maintained. The capital position is supported by carrying out different stresses covering idiosyncratic, market and combined scenarios with increasing severity. The latest ICAAP indicated sufficient capital under stress over the projected period. Under ILAAP, the liquidity profile and behaviour is analysed to assess the stability of funds to meet its outflows. The liquidity of the Bank is further judged under different stress scenarios covering idiosyncratic, market and combined stress. The stress is applied over a horizon of 30, 90 and 180 days and is conducted at monthly intervals to identify a building risk and take corrective actions. The latest liquidity stress test indicated sufficient capital under stress over all the scanned horizons.

Monitoring mechanism and policies status

To implement risk management systems and processes in PNBIL, Board has approved an overarching 'Risk Governance Framework' for the Bank which acts as a guiding document.. Within this overarching framework, various policies and procedures have been framed and adopted by the Bank to implement and develop a Bank-wide risk culture. This is supported by following set of policies / procedures:

Risk	Policies, Procedures and Processes addressing and mitigating the risks
Credit Risk	Credit Risk Management Policy and Procedures, Collateral Management Policy, Asset Classification and Impairment Policy and Debt Recovery Policy
Market Risk	Treasury & Investment Policy

Liquidity Risk	ILAAP, Treasury & Investment Policy
Operational Risk	Operational Risk Policy, Fraud Prevention Policy, Cyber Security Policy, Complaints Handling Policy, Model risk Management Policy
Other Key Policies	Risk Appetite Statement, Risk Governance Framework, Recovery Plan, Resolution Plan, Reputational Risk Policy, Pillar 3 disclosures, Tax Strategy, Business strategy document, ICAAP, Corporate Governance Framework, CSR Policy, Use of External Auditors Policy
Regulatory Risk / Financial Crime / Anti–Money Laundering	Anti-Bribery and Corruption Policy, AML Counterterrorism and Sanctions Policy, Information Security Policy, Financial Promotion Policy, Whistleblowing and Reporting policy, Consumer Duty & Treating Customer Fairly Policy, Compliance Policy, Vulnerable Customer Policy, Privacy Notice Framework, Data Protection Policy
Operations / HR Related Policies	Business Continuity Plan, Outsourcing Policy, Code of Practice on Taxation, Appraisal Policy, Expenses Policy, Health and Safety Policy, Promotion Policy, Recruitment and Onboarding Policies, Remuneration Policy, Resignation, Termination and Retirement Policy, Staff Handbook, Training Policy, Transfer Policy and Operational Resilience Policy

In addition to above policies, PNBIL has put in place various tools, procedures and framework to monitor the various risks faced by the Bank and initiate corrective actions wherever required. Different MI such as Key Risk Indicator, Material Risk Trend Register and the Risk Appetite Dashboard are prepared at various frequencies and communicated to the SMFs, management and governance committees for their oversight.

Diversity and Inclusion

At PNBIL, we believe that creating a diverse, inclusive and supportive culture is not only the right thing to do, but also what is best for our business. It makes us better at understanding the needs of our customers and clients, and it creates a sense of belonging and value that enables our colleagues to perform at their best.

Diversity and inclusion are embedded within the Bank's culture. Different attributes relating to diversity and inclusion are tracked at the management committee level reinforcing the importance of diversity and inclusion.

Further details on our risk management objectives, policies, governance and risk appetite framework are set out in in the Risk Management Report (pages 11 to 19) of our Annual Report.

2.2 Governance

Overall risk management of the Bank is the ultimate responsibility of the Board. The Board has set up its risk appetite and the risk limits. The Bank takes strategic decisions based on the capital position and the portfolio mix is used to optimise the use of capital. The long-term business strategy of PNBIL is aligned to the risk appetite and capital projections of the Bank.

The Board is supported by the following Board level committees, the Board Risk Committee ('BRC'), the Board Audit & Compliance Committee ('BACC'), Credit Approval Committee ('CAC') and Nomination and Remuneration Committee ('NRC'). The Board and its subcommittees meet at least quarterly (except NRC, which meets as and when required) to discuss and deliberate its duties as per its terms of reference. Managing risks is an integral part of the day-to-day operations of the Bank at various levels. As a part of its risk management philosophy, the Board has approved various policies including the Risk Governance and Risk Appetite Framework, the Internal Capital Adequacy Assessment Process ('ICAAP'), the Internal Liquidity Adequacy Assessment Process ('ILAAP') including Liquidity Contingency Plan, Credit Risk Management Policy and Treasury & Investment Policy. The Bank also has Recovery and Resolution Plan in place.

The Executive Committee ('EXCO') derives its authority from the Board, to which it reports. EXCO is the leadership body for the Bank. It has a broad remit in terms of scope, covering as necessary significant business and operational issues. The committee is chaired by the MD. EXCO has five sub committees as follows:

Risk and Compliance Committee ('RCC')	The RCC has a principal focus on ensuring that the Bank has appropriate mechanisms for the measurement, monitoring and mitigation of all its risks other than those relating to credit and market risks which are monitored through CROC and ALCO respectively.
Asset and Liability Committee ('ALCO')	The ALCO is primarily responsible for monitoring market, capital and liquidity and funding risks and has a has a principal focus of monitoring the impact and potential risks to Bank's balance sheet with particular reference to ensuring that Bank meets its liquidity and regulatory capital requirements including appropriate levels of buffer and contingency.
Credit Risk Oversight Committee ('CROC')	The CROC is the principal 2nd line risk oversight committee and is chaired by the CRO. CROC has a principal focus on the monitoring and review of the Bank's credit risk and its lending activities, including its watch-list and non-performing assets.
HR, IT & Operations Committee ('HIOC')	The HIOC has a broad remit in terms of scope, covering as necessary the Bank's operational infrastructure.
Product Development Committee ('PDC'	The PDC has a broad remit in terms of scope covering as necessary the discussion/approval of new products and services, new methods of working or changes to products/services.

All the internal governance committee meetings are conducted monthly and earlier, if required.

3.Credit Risk

3.1 Qualitative Disclosures

Credit Risk Management Policy

Credit risk is defined as a potential financial loss on account of delay or denial of repayment of principal or interest with respect to a credit facility extended by the Bank, both fund and non-fund based. Credit risk can also arise on account of downgrading of counterparties to whom credit facilities are extended or whose credit instruments the Bank may be holding, causing the value of those assets to fall. Risks arising from adverse changes in the credit quality of borrowers or general deterioration in the economic conditions under which these counterparties operate could also affect the recoverability and value of Bank's assets and therefore its financial performance.

The following measures are in place to mitigate the credit risks:

- The Bank has a Credit Risk Management Policy, Risk Appetite Framework & Collateral Management Policy in place for management of Credit Risk.
- Every credit facility (except loans secured by fixed deposits and staff loans) is sanctioned by the Credit Approval Committee ('CAC').
- Credit risk is independently assessed by the Corporate Credit Department team on financial & non-financial parameters and challenged by the Credit Approval Committee before sanction.
- Concentration risk as per parameters defined in Risk Appetite Framework are considered, both with respect to individual or group exposures as well as industry/sector wide or country wide exposures.
- Most of the facilities are secured by tangible security with the Bank having a low threshold for undertaking unsecured exposure as defined in the Risk Appetite Framework.
- Centralised Credit Administration Department for better control over post sanction activities.
- Periodic review and monitoring of facilities is undertaken to identify and attend to any observed weakness in any facility.
- All facilities above prescribed threshold limits are reported to the Board.
- Lending policies and limits are periodically reviewed by the Board.

Internal Ratings

The Bank has in place internal rating and scoring models. All eligible non-bank credit counterparties are rated on these models. Rating/scoring is given on various financial and non-financial parameters such as financial strength, creditworthiness and repayment capacity of the borrower. Internal ratings/scorings are used while taking credit decisions.

For further information, see note 24 'Exposure to credit risk and availability of collateral security' of the Annual Report.

3.2 Quantitative Disclosures

i. The total gross credit risk exposures were:

As at 31st March 2024

Particulars ($ million)	2024	2023
On-balance sheet exposures	1,223.7	1,243.5
Off-balance sheet exposures	56.9	57.5
Derivatives	1.0	1.5
Total	**1,281.6**	**1,302.5**

ii. Exposure class wise distribution of exposure subject to credit risk is as below:

As at 31st March 2024

Exposure Class ($ million)	Gross Original Exposure	Exposure value[1]	Risk Weighted Assets	Average exposure value[2]
On Balance Sheet exposures:				
Central governments or central banks	96.0	96.0	-	121.3
Institutions	114.2	115.5	25.8	94.6
Corporates	169.4	114.0	114.0	113.2
Retail	5.7	0.2	0.1	0.1
Secured by mortgages on Immovable Property	554.4	547.1	322.2	500.6
Exposures in Default	244.0	85.0	113.4	91.9
High risk	34.9	32.7	49.0	46.0
Other Items	5.0	72.0	4.6	53.0
Total On Balance Sheet Exposures	1,223.6	1,062.5	629.1	1020.9
Off Balance Sheet exposures:				
Exposures to Corporates	16.1	-	-	-
Retail Exposures	35.3	-	-	-
Exposures Secured by Mortgages on Immovable Property	3.8	-	-	-
High Risk	1.7	-	-	-
Total Off Balance Sheet Exposures	56.9	-	-	-
Counterparty Risk Exposure:				
Derivatives	1.0	1.0	0.2	3.2
Total Counterparty Risk Exposure	1.0	1.0	0.2	3.2
Total Exposure subject to Credit Risk	1281.6	1063.4	629.3	1024.1

[1] *Exposure value: Exposure value after impairment provisions, credit risk mitigation and applying credit conversion factors.*

[2] *Average Exposure value: Average is calculated using the previous four quarters' exposures*

As at 31st March 2023

Exposure Class ($ million)	Gross Original Exposure	Exposure value[1]	Risk Weighted Assets	Average exposure value[2]
On Balance Sheet exposures:				
Central governments or central banks	140.4	140.4	-	143.8
Institutions	101.2	120.3	50.4	88.7
Corporates	170.3	109.1	108.8	124.0
Retail	7.0	0.1	0.1	2.6
Secured by mortgages on Immovable Property	460.3	452.9	250.1	439.9
Exposures in Default	277.6	99.5	131.4	102.5
High risk	80.8	80.4	120.5	77.1
Other items	5.8	61.0	5.4	58.6
Total On Balance Sheet Exposures	**1,243.5**	**1,063.7**	**666.7**	**1,037.2**
Off Balance Sheet exposures:				
Exposures to Corporates	25	-	-	-
Retail Exposures	26.9	-	-	-
Exposures Secured by Mortgages on Immovable Property	1.2	-	-	-
High Risk	4.4	-	-	-
Total Off Balance Sheet Exposures	**57.5**	**-**	**-**	**-**
Counterparty Risk Exposure:				
Derivatives	1.5	1.5	0.3	2.1
Total Counterparty Risk Exposure	**1.5**	**1.5**	**0.3**	**2.1**
Total Exposure subject to Credit Risk	**1,302.5**	**1,065.2**	**667.0**	**1,039.3**

[1]*Exposure value: Exposure value after impairment provisions, credit risk mitigation and applying credit conversion factors.*

[2] *Average Exposure value: Average is calculated using the previous four quarters' exposures*

iii. Geographical distribution into major areas is as below:

As at 31st March 2024

Geography	Gross Original Exposure ($ million)	Exposure value ($ million)	Risk Weighted Assets ($ million)	Actual RWA as % of total
United Kingdom	797.9	751.6	414.7	65.9%
India	289.7	193.5	151.1	24.0%
USA	66.2	61.3	7.8	1.2%
Luxembourg	39.9	-	-	0.0%
Mauritius	20.7	13.7	20.0	3.2%
Others	67.3	43.4	35.9	5.7%
Total	1,281.6	1,063.4	629.3	100.00%

As at 31st March 2023

Geography	Gross Original Exposure ($ million)	Exposure value ($ million)	Risk Weighted Assets ($ million)	Actual RWA as % of total
United Kingdom	783.9	721.5	410.3	61.5%
India	295.8	223.6	193.9	29.1%
USA	77.8	73.4	9.0	1.4%
Luxembourg	39.2	-	-	0.0%
Mauritius	34.5	14.4	14.4	2.2%
Others	71.3	32.3	39.4	5.9%
Total	1,302.5	1,065.2	667.0	100.0%

iv. Industry wise distribution of exposures by asset class:

As at 31st March 2024

Exposure class ($ million)	Finance	Manufacturing & Mining	Real Estate & Construction	Retail/ Wholesale Trade	Others	Exposure Value
Central Govts. or Central Banks	96.0	-	-	-	-	96.0
Corporates	32.6	6.9	-	-	74.5	114.0
Exposures in default	-	28.0	32.4	3.7	21.0	85.0
High Risk	-	-	32.7	-	-	32.7
Institutions	116.5	-	-	-	-	116.5
Secured by mortgages on immovable property	-	-	541.1	-	6.0	547.1
Other items	72.0	-	-	-	-	72.0
Retail	-	-	0.1	-	0.1	0.2
Exposure Value	317.1	34.9	606.2	3.7	101.5	1063.4

As at 31st March 2023

Exposure class ($ million)	Finance & Business	Manufacturing & Mining	Real Estate & Construction	Retail/ Wholesale Trade	Others	Exposure Value
Central Govts. or Central Banks	140.4	-	-	-	-	140.4
Corporates	31.7	9.4	-	0.0	68.0	109.1
Exposures in default	-	35.5	39.6	4.4	20.0	99.5
High Risk	-	-	80.4	-	-	80.4
Institutions	121.7	-	-	-	-	121.7
Secured by mortgages on immovable property	-	-	445.9	0.6	6.4	452.9
Other items	61.0	-	-	-	-	61.0
Retail	-	-	-	-	0.1	0.1
Exposure Value	354.9	44.9	565.9	5.0	94.5	1,065.2

v. Exposure value subject to credit risk analysed by Credit Quality Step ('CQS'):

The Bank uses credit ratings provided by external credit rating agencies. There has been no change in the usage of these ratings from last year. The Bank assigns each of its exposures to one of the CQS with reference to relevant issuer and issue credit assessments. Risk weight percentages are then determined with reference to exposure class, CQS, and maturity of the exposure. The following tables detail the standardised credit risk exposures by CQS and exposure class. All exposures are stated after impairment provisions and post application of CRM techniques and after application of CCF.

As at 31st March 2024

Exposure class ($ million)	CQS 1	CQS 2	CQS 3	CQS 4	CQS 5	Unrated	Exposure Value
Central Govts. or Central banks	96.0	-	-	-	-	0	96.0
Corporates	-	-	74.4	-	-	39.6	114.0
Exposures in default	-	-	12.5	-	-	72.5	85.0
High Risk	-	-	-	-	-	32.7	32.7
Institutions	29.3	5.1	78.0	-	-	3.1	115.5
Secured by mortgages on immovable property	0	0	0	-	-	547.1	547.1
Other items	0	0	0	-	-	72.0	72.0
Retail	0	-	-	-	-	0.2	0.2
Total On Balance Sheet exposures	125.3	5.1	164.9	-	-	767.2	1,062.5
Off Balance Sheet exposures							
Corporates	-	-	-	-	-	-	-
Total Off-Balance Sheet exposures	-	-	-	-	-	-	-
Total Derivatives exposures	0.7	0.3	-	-	-	-	1.0
Total	126.0	5.4	164.9	0.0	0.0	767.2	1063.4

As at 31st March 2023

Exposure class ($ million)	CQS 1	CQS 2	CQS 3	CQS 4	CQS 5	Unrated	Exposure Value
Central Govts. or Central banks	140.4	-		-	-	-	140.4
Corporates		-	66.4	-	-	42.7	109.1
Exposures in default		-	11.1	-	-	88.5	99.6
High Risk		-	-	-	-	80.4	80.4
Institutions	16.0	3.8	86.0	13.6	-	0.8	120.2
Secured by mortgages on	-	-	-	-	-	452.9	452.9
Other items	-	-	-	-	-	61.0	61.0
Retail	-	-	-	-	-	0.1	0.1
Total On Balance Sheet exposures	156.4	3.8	163.5	13.6	-	726.4	1,063.7
Off Balance Sheet exposures							
Corporate	-	-	-	-	-	-	-
Total Off-Balance Sheet exposures	-	-	-	-	-	-	-
Total Derivatives exposures	0.8	0.7	-	-	-	-	1.5
Total	157.2	4.5	163.5	13.6	0.0	726.4	1,065.2

vi. The residual contractual maturity breakdown of exposures by asset class:

As at 31st March 2024

Exposure Class ($ million)	0-3 months	4-12 months	1-5 years	5+ years	Exposure Value
Central Govts. or Central banks	54.2	19.9	18.1	3.8	96
Corporates	30.7	30.3	52.0	1	114.0
Exposures in Default	-	-	3.5	81.5	85
High Risk	17.1	5.4	0.5	9.7	32.7
Institutions	105.6	-	10.9	0	116.5
Secured by mortgages on immovable property	191.5	46.7	306.5	2.4	547.1
Other Items	72.0	-	-	-	72
Retail	0.1	0.1	-	-	0.2
Exposure Value	471.2	102.4	391.5	98.4	1,063.4

As at 31st March 2023

Exposure Class ($ million)	0-3 months	4-12 months	1-5 years	5+ years	Exposure Value
Central Govts. or Central banks	100.9	23.7	6.0	9.9	140.5
Corporates	36.8	28.9	43.5	-	109.2
Exposures in Default	3.6	-	0.4	95.5	99.5
High Risk	47.1	31.5	1.7	-	80.3
Institutions	74.9	29.8	17.0	-	121.7
Secured by mortgages on immovable property	37.1	73.9	309.4	32.5	452. 9
Other Items	61.0	-	-	-	61.0
Retail	0.1	-	-	-	0.1
Exposure Value	**361.5**	**187.8**	**378.0**	**137.9**	**1,065.2**

The above tables show residual maturity of exposures with a breakdown by exposure class. All exposures are stated after impairment provisions and post application of CRM and after application of any CCF.

The maturity of exposures is shown on a contractual basis and does not consider any instalments receivable over the life of the exposure. Hence, the actual maturity may be different.

Impairment and provisions

The allowance for credit losses represents the Bank's estimate of the expected credit loss ('ECL') on receivables at the date of the statement of financial position. The adequacy of the allowance for credit losses is assessed monthly and the assumptions and models used in establishing the allowance are evaluated regularly.

Under IFRS 9, credit loss allowances are measured on each reporting date according to a three stage ECL impairment model:

- Stage 1 (12-month ECL) – unimpaired and without significant increase in credit risk on which a 12-month allowance for ECL is recognised.
- Stage 2 (Lifetime ECL not credit impaired) – following a significant increase in credit risk relative to the initial recognition of the financial asset, a loss allowance is recognised equal to the credit losses expected over the remaining lifetime of the asset.
- Stage 3 (Lifetime ECL credit impaired) – objective evidence of impairment and are therefore considered to be in default or credit impaired on which a lifetime ECL is recognised.

For more information on impairment and provisions, see section 2 (vii) – 'Summary of Accounting policies' and note 23 'Allowance for Expected Credit Losses' of the Annual Report.

Further quantitative information in relation to credit risk quality has been disclosed in the tables below:

- Table UK CQ3 - Credit quality of performing and non-performing exposures by past due days.
- Table UK CR1 - Performing and non-performing exposures and related provisions.

Credit Risk Mitigation

Policies and processes (and an indication of the extent to which the Bank makes use of) on and off-balance sheet netting;

➢ Policies and processes for collateral valuation and management

The Bank has in place a 'Collateral Management Policy' which is used for collateral valuation and management. The Collateral Management Policy addresses the following basic objectives of credit management:

- Mitigation of credit risk & enhancing awareness on identification of appropriate collateral
- Optimising the benefit of credit risk mitigation in computation of capital charge
- Mitigation of risks attendant to the use of credit risk mitigation techniques

For more information on collateral valuation and management, see note 24 'Exposure to credit risk and availability of collateral security' of the Annual Report.

➢ A description of the main types of collateral taken by the Bank

Deposits kept with the Bank are the only financial collateral treated for credit risk mitigation. These are included under financial collateral (funded credit protection) for the purpose of credit risk mitigation.

➢ The main types of guarantor counterparty and their credit worthiness

Deposits kept with the Parent Bank against our exposure are treated as a guarantee for credit risk mitigation (these positions are not material). Depending on the level of external rating of the Parent Bank, deposits with the Parent Bank are treated as an exposure with the Parent. The Bank has a netting agreement with the Parent Bank, under which exposures with the Parent are netted, and risk weights are only applied on the remaining exposure. The Bank has also put in place limits on net exposure to the Parent and operates within those limits.

Further, other guarantees/Stand-by Letters of Credit (SBLC) issued by banks are treated as guarantees. No other guarantee is recognised for the purpose of risk mitigation. For guarantees/SBLC issued by banks, exposure is shifted to that bank.

➢ Information about (market or credit) risk concentrations within the mitigation taken

Except deposits (with us or the Parent Bank), SBLC's (primarily with Indian banks) are the only risk concentrations within the mitigation taken.

UK CQ3: Credit quality of performing and non-performing exposures by past due days

As at 31st March 2024

	($ million)	Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are past due ≤ 90	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits	133.5	133.5	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	688.3	687.9	0.4	255.1	-	3.9	17.1	0.5	11.8	10.1	211.8	255.1
020	Central banks	0.1	0.1	-	-	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	10.1	10.1	-	8.0	-	-	-	-	8.0	-	-	8.0
050	Other financial corporations	39.9	39.9	-	-	-	-	-	-	-	-	-	-
060	Non-financial corporations	622.3	621.9	0.4	246.3	-	3.9	17.1	0.5	3.8	10.1	210.9	246.3
070	Of which SMEs	533.9	533.5	0.4	33.8	-	1.5	13.4	0.5	-	-	18.4	33.8
080	Households	15.9	15.9	-	0.9	-	-	-	-	-	-	0.9	0.9
090	Debt securities	138.1	138.1	-	0.8	-	-	-	-	-	0.4	0.4	0.8
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	38.8	38.8	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	24.8	24.8	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	74.6	74.6	-	0.8	-	-	-	-	-	0.4	0.4	0.8
150	Off-balance-sheet exposures	56.9	-	-	-	-	-	-	-	-	-	-	-
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
170	General governments	-	-	-	-	-	-	-	-	-	-	-	-
180	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
190	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-
200	Non-financial corporations	51.6	-	-	-	-	-	-	-	-	-	-	-
210	Households	5.3	-	-	-	-	-	-	-	-	-	-	-
220	Total	1,016.7	959.4	0.4	255.9	-	3.9	17.1	0.5	11.8	10.5	212.2	255.9

As at 31st March 2023

	($ million)	Gross carrying amount/nominal amount											
		Performing exposures			Non-performing exposures								
			Not past due or past due ≤ 30 days	Past due > 30 days ≤ 90 days		Unlikely to pay that are not past due or are	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 years	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which defaulted
005	Cash balances at central banks and other demand deposits	144.4	144.4	-	-	-	-	-	-	-	-	-	-
010	Loans and advances	645.0	644.7	0.4	283.8	14.2	-	-	4.8	10.1	104.5	150.2	283.8
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	0.3		-	8.0	-	-	-	-	8.0	-	-	8.0
050	Other financial corporations	39.2	39.2	-	-	-	-	-	-	-	-	-	-
060	Non-financial corporations	582.3	581.9	0.4	275.0	14.2	-	-	4.8	2.1	103.6	150.2	275.0
070	Of which SMEs	479.0	478.6		32.8	7.4	-	-	-	-	7.2	18.3	32.8
080	Households	23.2	23.2	-	0.8	-	-	-	-	-	0.8	-	0.8
090	Debt securities	163.8	163.8	-	0.8	-	-	-	-	0.4	-	0.4	0.8
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	50.2	50.2	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	46.9	46.9	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	66.7	66.7	-	0.8	-	-	-	-	0.4	-	0.4	0.8
150	Off-balance-sheet exposures	57.6	-	-	-	-	-	-	-	-	-	-	-
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-
170	General governments	-	-	-	-	-	-	-	-	-	-	-	-
180	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
190	Other financial corporations	10.5	-	-	-	-	-	-	-	-	-	-	-
200	Non-financial corporations	42.1	-	-	-	-	-	-	-	-	-	-	-
210	Households	5.0	-	-	-	-	-	-	-	-	-	-	-
220	Total	1,010.	952.9	0.4	284.6	14.2	-	-	4.8	10.5	104.5	150.6	284.6

UK CR1: Performing and non-performing exposures and related provisions.

As at 31st March 2024

	($ million)	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures			Non-performing exposures			Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			
005	Cash balances at central banks	133.5	133.5	-	-	-	-	-	-	-	-	-	-	-	-	-
010	**Loans and advances**	**688.3**	**653.8**	**34.5**	**255.1**		**255.1**	**(0.5)**	**(0.5)**	**-**	**(159.8)**		**(159.8)**		**659.1**	**84.1**
020	Central banks	0.1	0.1	-	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	10.1	10.1	-	8.0	-	8.0	-	-	-	(8.0)	-	(8.0)	-	-	-
050	Other financial corporations	39.9	39.9	-	-	-		-	-			-		-	39.9	-
060	Non-financial corporations	622.3	588.4	33.9	246.3	-	246.3	(0.4)	(0.4)	-	(151.8)	-	(151.8)	-	603.5	83.2
070	Of which SMEs	533.9	499.9	33.9	33.8	-	33.8	(0.1)	(0.1)		(20.7)	-	(20.7)	-	533.7	13.1
080	Households	15.9	15.3	0.6	0.9	-	0.9	-	-		-	-	-	-	15.7	0.8
090	**Debt securities**	**138.1**	**138.1**	**-**	**0.8**	**-**	**0.8**	**(0.1)**	**(0.1)**		**(0.8)**	**-**	**(0.8)**	**-**	**-**	**-**
100	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110	General governments	38.8	38.8	-	-	-	-	-	-	-	-	-	-	-	-	-
120	Credit institutions	24.8	24.8	-	-	-	-	-	-	-	-	-	-	-	-	-
130	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	74.6	74.6	-	0.8	-	0.8	(0.1)	(0.1)		(0.8)		(0.8)	-	-	-
150	**Off-balance-sheet exposures**	**56.9**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170	General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
180	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
190	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
200	Non-financial corporations	51.6	-	-	-	-	-	-	-	-	-	-	-	-	-	-
210	Households	5.3	-	-	-	-	-	-	-	-	-	-	-	-	-	-
220	**Total**	**1,016.7**	**925.3**	**34.5**	**255.9**	**-**	**255.9**	**(0.6)**	**(0.6)**	**-**	**(160.6)**	**-**	**(160.6)**	**-**	**659.1**	**84.1**

UK CR1: Performing and non-performing exposures and related provisions.

As at 31st March 2023

	($ million)	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
		Performing exposures			Non-performing exposures			Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			
005	Cash balances at central banks	144.4	144.4	-	-	-	-	-	-	-	-	-	-	-	-	-
010	**Loans and advances**	**645.0**	**644.7**	**0.4**	**283.8**		**283.8**	**(2.7)**	**(2.7)**	**-**	**(176.6**		**(176.**		**628.0**	**89.5**
020	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030	General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
040	Credit institutions	0.3	0.3	-	8.0	-	8.0	-	-	-	(8.0)	-	(8.0)	-	-	-
050	Other financial corporations	39.2	39.2	-	-	-		(0.1)	(0.1)			-		-	39.1	-
060	Non-financial corporations	582.3	581.9	0.4	275.8	-	275.8	(2.5)	(2.5)	-	(168.5	-	(168.	-	565.9	88.8
070	Of which SMEs	479.0	478.6	0.4	32.8	-	32.8	(1.8)	(1.8)		(25.4)	-	(25.4)	-	477.2	7.4
080	Households	23.2	23.2	-	0.8	-	0.8	(0.1)	(0.1)		(0.1)	-	(0.1)	-	23.0	0.7
090	Debt securities	163.8	163.8	-	0.8	-	0.8	(0.4)	(0.4)		(0.8)	-	(0.8)	-	-	-
100	Central banks	-	-	-	-	-	-	-	-	-	-	-		-	-	-
110	General governments	50.2	50.2	-	-	-	-	-	-	-	-	-		-	-	-
120	Credit institutions	46.9	46.9	-	-	-	-	(0.1)	(0.1)	-	-	-	-	-	-	-
130	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
140	Non-financial corporations	66.7	66.7	-	0.8	-	0.8	(0.3)	(0.3)		(0.8)		(0.8)	-	-	-
150	**Off-balance-sheet exposures**	**57.6**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
160	Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170	General governments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
180	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
190	Other financial corporations	10.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-
200	Non-financial corporations	42.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
210	Households	5.0	-	-	-	-	-	-	-	-	-	-	-	-	-	-
220	**Total**	**1,010.8**	**952.9**	**0.4**	**284.6**	**-**	**284.6**	**(3.2)**	**(3.2)**	**-**	**(177.4**	**-**	**(177.**	**-**	**628.0**	**89.5**

UK CR3 - Disclosure of the use of credit risk mitigation techniques

As at 31st March 2024

	($ million)	Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
1	Loans and advances	79.6	747.6	746.3	1.3	-
2	Debt securities	141.0	-	-	-	
3	Total	220.6	747.6	746.3	1.3	-
4	Of which non-performing exposures	11.2	84.1	83.5	0.6	-
5	Of which defaulted	11.2	84.1			

As at 31st March 2023

	($ million)	Unsecured carrying amount	Secured carrying amount	Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
1	Loans and advances	64.8	718.2	699.1	19.1	-
2	Debt securities	163.4	-	-	-	
3	Total	228.2	718.2	699.1	19.1	-
4	Of which non-performing exposures	17.0	90.3	89.7	0.6	-
5	Of which defaulted	17.0	90.3			

4. Counterparty Credit Risk (‘CCR’)

CCR is the risk that the counterparty to a transaction could default before the final settlement of the transaction’s cash flows. It includes the following transaction types: derivative instruments, repurchase agreements, securities or commodities lending, long settlement transactions and lending transactions with margin replacement.

Key Figures*

	Exposure value		Risk Weighted Assets	
($ million)	2024	2023	2024	2023
Counterparty credit risk	1.4	1.8	0.3	0.4
Of which the standardised approach	1.0	1.5	0.2	0.3
Of which internal model method (IMM)	-	-	-	-
Of which exposures to CCPs	-	-	-	-
Of which credit valuation adjustment - CVA	0.4	0.3	0.1	0.1

*CVA exposure excluded from total Credit Risk analysis

4.1. Qualitative Disclosures

Given the current business model the size of the derivative business does not exceed £260 million and 10% of total assets, the Bank has thus opted for the Simplified Standardised Approach to calculate CCR. The Bank uses foreign exchange swaps and interest rate swaps as derivatives in our books which fall under the scope for calculation of CCR, however there were no interest rate swaps at the balance sheet date.

No derivatives are entered for clients. Forex swaps are entered to cover own positions.

The Bank mitigates the credit risk of derivatives by entering into International Swaps and Derivative Association (ISDA) master netting agreements. Under these agreements, when a credit event such as a default occurs, all outstanding transactions under the agreement are terminated, the terminal value is assessed and only a single net amount is due or payable in settlement of all transactions. When entered into the Bank’s sale and repurchase transactions are also covered by master agreements with netting terms similar to ISDA master netting agreements. The ISDA and similar master netting agreements create for the parties to the agreement a right to the set-off of recognised amounts that is enforceable only following an event of default, insolvency or bankruptcy of the Bank or the counterparties or following other predetermined events.

The Bank has netting agreements in place and all over the counter ('OTC') derivatives are treated as margined transactions. The netting agreements meet the conditions laid out in the CRR and are considered in identifying and evaluating 'netting sets' for the purposes of calculation of CCR.

In addition to CCR, Credit Valuation adjustment ('CVA') on derivatives is being calculated based on the standardised approach.

4.2. Qualitative Disclosures

Table UK CCR1 – Analysis of CCR exposure by approach

As at 31st March 2024

	($ million)	Replacement cost (RC)	Potential future exposure (PFE)	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
UK2	Simplified SA-CCR (for derivatives)	0.0	1.0	1.4	1.0	1.0	1.0	0.2
6	Total				1.0	1.0	1.0	0.2

As at 31st March 2023

	($ million)	Replacement cost (RC)	Potential future exposure (PFE)	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
UK2	Simplified SA-CCR (for derivatives)	0.0	1.5	1.4	1.5	1.5	1.5	0.3
6	Total				1.5	1.5	1.5	0.3

5. Market Risk

Market risk is the risk of loss of value of financial instruments arising from changes in market parameters, the volatility of these parameters and correlations between them.

5.1. Qualitative Disclosures

The investment / trading risk appetite set by the Board has the objective of allowing management to conduct investment and trading activities but setting conservative boundaries with regard to the level of market risk that can be taken. This reflects the Board's cautious risk appetite with regard to taking material market risk positions. The Treasury function execute trading activity and manage market risk as the first line of defence, trading limits are defined in the Treasury and Investment Policy. The Risk function independently monitors and reports market risk parameters.

5.2. Quantitative Disclosures

As at 31st March 202 there were no financial instruments subject to position risk. The bank was subject to capital own requirements on foreign exchange positions as detailed in the table below. Per the UK CRR guidelines Risk Weighted Asset exposure amount is calculated as the sum of the net open short and long foreign exchange positions across both trading and non-trading books.

The table below shows the market risk own funds requirements and risk weighted exposure amounts:

As at 31st March

Particulars ($ million)	2024		2023	
Market Risk Category	Risk Weighted exposure amount	Own funds requirements	Risk weighted exposure amount	Own funds requirements
Foreign exchange risk	11.6	0.9	11.2	0.9
Position risk on traded debt instruments	-	-	-	-
Total	11.6	0.9	11.2	0.9

5.3. IRRBB

Interest Rate Risk in the Banking Book '(IRRBB')

IRRBB more specifically refers to the current or prospective risk to the Bank's capital and earnings arising from adverse movements in interest rates that affect the institution's banking book positions. The Treasury function is responsible for managing any interest rate risk caused as a result of customer and bank related transactions.

The Bank monitors its interest rate mismatches on a regular basis through Economic Value at Risk (200 basis points parallel rate shock), gap monitoring and monitoring of prescribed limits. The Bank has a stipulated limit for open positions and the actual open position is measured and monitored regularly.

Assets and liabilities on floating rate of interest are placed as per the next interest rate reset date 'time buckets'. Those with fixed rate of interest are placed as per the contractual maturity date. Assets/ liabilities not sensitive to rate of interest are treated as non-sensitive for the purpose of this calculation. Non-performing assets are also treated as non-sensitive. Non maturity deposits are placed into the overnight 'time bucket'. IRRBB is measured on a monthly basis. The risk calculated on this account is treated as a Pillar 2 risk and capital is provided accordingly.

The majority of the Bank's liabilities are at a fixed rate of interest. The Bank's loans and advances are predominantly priced with a floating rate of interest. The floating component is linked to the Bank of England base rate or USD LIBOR / SOFR, and a fixed spread over that rate is charged to the customers.

The potential loss on account of upward or downward movement of interest rates by 200 basis points based on exposure as at 31st March 2024 was $3.1 million (2023: $3.1 million).

6. Operational Risk

6.1. Qualitative Disclosures

Operational risk is the risk of losses on account of inadequate or defective systems and processes, human or technical failures, or external events. Operational risk is monitored continuously through the KRI framework, incident reporting and the Risk and Control Self-Assessment ('RCSA') framework of the Bank. Major sources of operational risks for the Bank are identified by management and include IT and cyber security risk, data security risk, people risk, internal and external fraud, business process risk, financial crime, legal risk, change risk, outsourcing risk and external event risk such as failure of transportation, non-availability of utilities etc.

The Bank assesses the plausibility of the above risks in light of the various controls put in place to mitigate these risks to keep them within the Bank's appetite. They are regularly monitored for early warning signals through various tools so that appropriate and timely action can be undertaken.

The Bank employs resource across Financial Crime Operations, Middle-Office and Compliance & Conduct Risk for strengthening the quality, controls and processes. The Bank also has in place a Cyber incident response plan and Cyber security strategy implementation plan to strengthen its cyber security in the rising cybercrime environment.

The Bank uses the Basic Indicator Approach ('BIA') to determine our Pillar 1 requirements for operational risk. The BIA broadly uses an average of the last three years audited operating income to calculate the Pillar 1 requirement. Under the BIA, the Bank holds capital of 15% of the average annual gross operating income over a three-year period.

6.2. Quantitative Disclosures

Table UK OR1 - Operational risk own funds requirements and risk-weighted exposure amounts

As at 31st March 2024

Banking activities ($ million)		Relevant indicator			Own funds requirements	Risk weighted exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to BIA*	28.9	33.1	34.0	4.8	60.0

*2023 operational risk calculation includes prior period adjustment to operating income driven by reclassification of operating income deductions.

As at 31st March 2023

Banking activities ($ million)		Relevant indicator			Own funds requirements	Risk weighted exposure amount
		Year-3	Year-2	Last year		
1	Banking activities subject to BIA	20.9	28.9	33.1	4.1	51.8

7. Other Risks

7.1. Asset Encumbrance

Asset encumbrance arises from collateral pledged against secured funding and other collateralised obligations. As at 31st March 2024, the Bank has no encumbered assets (2023: Nil).

7.2. Liquidity

Liquidity risk is the possibility of being unable to meet present and future financial obligations as they become due or can only do so at an excessive cost. The Bank has implemented liquidity guidelines as specified by the PRA. It maintains a Liquidity Coverage Ratio ('LCR') and a Net Stable Funding Ratio ('NSFR') above the minimum levels as stipulated by the PRA.

Key figures

As at 31st March

$ (million)	2024	2023
Liquidity Coverage Ratio (LCR)		
Total High-quality liquid assets (HQLA) (Weighted value - average)	146,547	165,458
Cash Outflows - Total weighted value	62,080	112,607
Cash Inflows - Total weighted value	39,435	84,455
Total net Cash outflows (adjusted value)	22,645	28,152
Liquidity coverage ratio	528%	588%
Net Stable Funding Ratio (NSFR)		
Total available stable funding	801,273	819,141
Total required stable funding	618,766	613,322
NSFR ratio (%)	130%	135%

7.2.1. Qualitative Disclosures

Liquidity risk entails the potential losses that may be incurred by an entity as a result of its inability to secure funding on the market and/or the higher borrowing costs of new sources of finance.

The Bank's liquidity risk is centrally managed by the Treasury function with monitoring and oversight conducted by the Risk function. Treasury aims to optimise maturities and costs to avoid risks in funding the Bank's operations and effectively manage the risk both intra-day and in the longer term.

It follows these principles:

- Greater reliance on customer deposits due to the retail nature of the balance sheet.
- Limited use of short term funding.
- Centralised liquidity model.
- Sufficient liquidity reserves to be used in adverse scenarios.

Liquidity and funding risk is monitored using the following approaches (but not limited to):

- The LCR is monitored daily by the Treasury function.
- The Asset & Liability Committee ("ALCO") governs the management of liquidity risk.
- The Risk function deliver the annual ILAAP exercise which sets the liquidity management rules and parameters used by the business to manage this risk. This document also defines the Liquidity Contingency Plan ("LCP") which is delivered by the Treasury function.
- The Risk function conduct monthly stress tests and these are presented to the ALCO.
- The Finance function deliver relevant regulatory reporting for liquidity risk metrics e.g. LCR and NSFR reporting.

7.2.2. Quantitative Disclosures

The Bank has implemented liquidity guidelines as specified by the PRA. It maintains a Liquidity Coverage Ratio ('LCR') and a Net Stable Funding Ratio ('NSFR') above the minimum levels as stipulated by the PRA. The table below shows the LCR and NSFR as at 31st March:

Key Liquidity Metrics	2024	2023
Liquidity Coverage Ratio (LCR)	528%	588%
Net Stable Funding Ratio (NSFR)	130%	135%

8. Remuneration Disclosures

For the year end 31st March 2024, the current remuneration guidance for the Bank is based on the Remuneration part of the PRA rulebook and the FCA's Dual-regulated firms Remuneration Code (SYSC 19D). This section includes information which is required to be disclosed in accordance with Article 450 of the CRR. The Bank currently falls within Proportionality Level Three firm in accordance with PRA Supervisory Statement SS2/17 and is accordingly not required to publish certain disclosures.

The PRA has defined certain requirements relating to remuneration, referred to as the Remuneration Code ('the Code'). Firms that fall within the scope of the Code (which includes banks) must establish, implement and maintain remuneration policies, procedures and practices that are consistent with, and promote, sound and effective risk management. The Bank's Remuneration Policies are designed to comply with the Code and the Bank is committed to adherence to its practices and guidelines in respect of Code Staff.

Remuneration matters pertaining to the Bank are undertaken by the Nomination and Remuneration Committee ('NRC'). The NRC consists of three non-executive directors. Members are appointed by the Board on the recommendation of the NRC with input from the Chairperson of the NRC. The Chairperson of the NRC is the chairperson of the Bank's Board. In addition to NRC members, other individuals such as the Bank's MD/CEO, Executive Director may attend on invitation. The NRC meets as required. It met twice during the financial year 2023-24.

The NRC performs the following roles:

- evaluate the balance of skills, experience, independence and knowledge of the Board.
- regularly review the structure, size and composition (including skills, knowledge, experience and diversity) of PNBIL's executive directors, executive management and senior management and make recommendations to the Board with regard to any changes.
- give full consideration to succession planning for executive directors, executive management and senior management in the course of its work, taking into account the challenges and opportunities facing PNBIL, and the skills and expertise needed at Board and in senior executive appointments in the future and having regard to length of service and expected date on which existing directors and senior level executives will conclude their term of office.
- oversee the design and operation of PNBIL's remuneration policy, ensuring that remuneration is appropriate and consistent with PNBIL's culture, long-term business and risk appetite, PNBIL's performance and control environment, legal and regulatory requirements and the principles of corporate governance.
- consistent with the remuneration policies of Punjab National Bank, India ('Parent') to set and recommend to the Board for approval, the overarching principles and parameters of the remuneration policy across PNBIL to ensure an overall coherent approach to remuneration in respect of all employees.
- review any performance conditions and remuneration incentives, immediate and deferred remuneration and that any incentives are fully compatible with risk policies and systems.
- ensure upper limits of any remuneration incentives are disclosed and ensure any performance conditions, including non-financial metrics are relevant, stretching and designed to promote PNBIL's long-term success.
- ensure that all relevant legislation, regulatory requirements and guidance on remuneration practice including but not necessarily limited to the Companies Act 2006, the Remuneration Code and the UK Corporate Governance Code publishes from time to time are considered and complied with when setting the remuneration policy.

The Remuneration policy reflects the Bank's objectives for good corporate governance as well as sustained and long-term value creation for shareholders. In addition, it ensures that the Bank is able to attract, develop and retain high-performing and motivated employees. The Remuneration policy was not reviewed in the financial year 2023-24.

The Chairperson of the Board and one of the non-executive directors are from the Parent Bank and are not remunerated by PNBIL. The Managing Director is a Parent Bank Appointee on a secondment basis and his remuneration is guided by a Standing Committee set up by Government of India for determining salary and other service conditions of officers of public sector banks posted abroad. Two independent Non-Executive Directors are paid fixed salary/fees and allowances per annum. The other executive director and key persons are on special contract or negotiated pay, which is annually reviewed by the NRC.

Other than Director's remunerations, the Bank has two pay groups of employees in UK – those on secondment to the Bank from the Parent Bank and those who are locally recruited. The employees on secondment are governed by the salary structure approved by the Standing Committee set up by Government of India for determining salary and other service conditions of officers of public sector banks posted abroad, as well as by the Board of Directors of the Parent Bank. Their salary, perquisites and allowances are fixed accordingly and include certain fixed net of tax basic pay, payment of tax and NI and reimbursement of furnished accommodation, utility bills, telephone, newspaper and medical expenses.

In relation to locally recruited staff, annual increments are considered based on the employee's performance and conduct as determined by key performance indicators ('KPI'). Such annual increments are paid as per the employee's scale of pay.

The Bank has an independent back office in India. At the back office, there are two groups of employees. Senior officers are on deputation from the Parent Bank and are paid salary as per the salary structure of nationalised banks in India. In addition, each of them is paid a deputation allowance. Junior staff are on contract from an employee management agency and are treated as employees of the contractor.

None of the employees of the Bank fall in the category of high earners (per article 450 UK CRR). As a matter of policy, the Bank does not pay any bonus to its employees. There is no deferral policy. There is no variable pay.

The Remuneration Code requires that banks identify relevant senior and key roles and designate them as Code Staff/Material Risk Takers ('MRT'). As at 31st March 2024, 37 staff (2023: 38 staff) were identified as MRTs. These exclude the two directors from the Parent Bank as they are not paid any remuneration.

Remuneration for staff in control functions is independent from that of staff in the business units. Remuneration of such staff also comes under the scope of the NRC.

The Bank does not make discretionary pension payments and therefore does not benefit from the derogation laid down in Article 94(3) CRD in accordance with point (k) of Article 450(1) CRR.

Table UK REM1 - Remuneration awarded for the financial year

As at 31st March 2024

			a	b	d
		($ million)	MB Supervisory function	MB Management function	Other identified staff
1	Fixed remuneration	Number of identified staff	2	7	28
2		Total fixed remuneration	0.1	1.1	1.9
3		Of which: cash-based	0.1	0.9	1.3
7		Of which: other forms	-	0.2	0.6
9	Variable remuneration	Number of identified staff	-	-	-
10		Total variable remuneration	-	-	-

As at 31st March 2023

			a	b	d
		($ million)	MB Supervisory function	MB Management function	Other identified staff
1	Fixed remuneration	Number of identified staff	2	6	30
2		Total fixed remuneration	0.1	1.0	1.9
3		Of which: cash-based	0.1	0.9	1.2
7		Of which: other forms	-	0.1	0.7
9	Variable remuneration	Number of identified staff	-	-	-
10		Total variable remuneration	-	-	-

The entire remuneration, as above, is fixed, and there is no variable remuneration.
No special payments, sign-on or severance payment wages were made to identified staff.

9. Capital

9.1. Capital Resources

The following tables below provide details of the capital base of the Bank:

9.1.1. Reconciliation with Balance Sheet:

As at 31st March

Particulars ($ million)	2024	2023
Shareholders' equity as per statement of financial position	274.6	274.6
Retained earnings	(103.9)	(105.3)
Fair value reserve	(0.8)	(1.0)
IFRS 9 transitional adjustment	0.0	0.5
Less: Intangible assets	(0.2)	(0.2)
Less: Adjustments due to prudential filters	(0.8)	(0.6)
Less: Deferred tax assets	(24.9)	(25.0)
Total Core Tier I capital	**144.1**	**143.1**
Additional Tier I capital	45.0	45.0
Total Tier I capital	**189.1**	**188.1**
Eligible amount of Tier II adjustments	50.0	50.0
Less: Amortisation of Date Tier II capital maturing within 5 years	(16.0)	(11.7)
Total Tier II capital	**34.0**	**38.3**
Total Regulatory capital	**223.1**	**226.4**

9.1.2. Capital Ratios

As at 31st March

Particulars ($ million)	2024	2023
Risk Weighted Assets	701.0	730.1
Total Capital Ratio	31.8%	31.0%
CET 1 Ratio	20.6%	19.6%
Tier 1 Ratio	27.0%	25.8%
Tier 2 Ratio	4.9%	5.2%

9.1.3. Own funds disclosure templates

The following disclosures have been included in this section:

- Table UK CC1 – Composition of regulatory own funds
- Table UK CC2 - reconciliation of regulatory own funds to balance sheet in the audited financial statements
- Table UK CCA - Main features of regulatory own funds instruments and eligible liabilities instruments

9.2. Capital Requirements

9.2.1. Approaches to assess minimum capital requirement under Pillar 1

The Bank determines its Pillar 1 regulatory capital requirement based on the following approaches:

- Credit Risk: Standardised approach
- Market Risk: Standardised approach
- Operational Risk: Basic Indicator approach

Besides, capital requirement on the following is also included in Pillar 1 requirements:

- Counterparty credit risk ('CCR'): Simplified Standardised approach
- Credit valuation adjustment ('CVA') risk: Standardised method

The capital requirement for all the above risks is then aggregated to arrive at the minimum capital requirement under Pillar 1.

9.2.2. Own funds requirements under Pillar 1

Minimum Capital requirement under Pillar 1 as at 31st March is shown below:

As at 31st March

	2024		2023	
Particulars ($ million)	RWA	Pillar 1 capital requirements	RWA	Pillar 1 capital requirements
Credit Risk - Balance Sheet Assets	629.0	50.3	666.7	53.3
Credit Risk - Off Balance Sheet Assets	0.0	0.0	0.0	0.0
CCR For Forex Swaps	0.2	0.0	0.3	0.1
Credit Valuation Adjustment	0.1	0.0	0.1	0.0
Total Credit Risk	629.3	50.3	667.1	53.4
Market Risk – Foreign Exchange	11.6	0.9	11.2	0.9
Market Risk – Position risk on traded debt instruments	-	-	-	-
Total Market Risk	11.6	0.9	11.2	0.9
Operational Risk	60.0	4.8	51.8	4.1
Total RWA & Own funds requirements	701.0	56.0	730.1	58.4

9.2.3. Capital Buffers

➢ Countercyclical Capital Buffer

The tables below show the distribution of relevant credit exposures for the calculation of the Bank's countercyclical capital buffer ('CCyB').

As at 31st March 2024

010 Breakdown by country ($ million)	Credit Exposures	Own Funds Requirements		
	Exposure value	Own funds requirements	Own funds weights	Countercyclical capital rate
	010	070	110	120
All Other Countries	851.0	48.3	0.0	1.39%
020 Total	851.0	48.3	0.0	

As at 31st March 2023

010 Breakdown by country ($ million)	Credit Exposures	Own Funds Requirements		
	Exposure value	Own funds requirements	Own funds weights	Countercyclical capital rate
	010	070	110	120
All Other Countries	803.0	49.3	0.0	0.66%
020 Total	803.0	49.3	0.0	

➢ Institution Specific Countercyclical Capital Buffer

The table below shows the value and rate of the Bank's institution-specific countercyclical capital buffer requirement as under:

As at 31st March

($ million)	2024	2023
010 Total risk exposure amount	701.0	730.1
020 Institution specific countercyclical capital buffer rate	1.4%	0.7%
030 Institution specific countercyclical capital buffer requirement	9.7	4.9

9.2.4. Total Capital Requirement ('TCR')

The Bank's TCR applicable as at 31st March 2024 was 11.36% of risk weighted assets. The TCR includes Pillar 1 requirement of 8% and Pillar 2A requirement of 3.36% of risk weighted assets.

The Bank assesses its Pillar 2A requirement internally under the annual ICAAP review. However, as the internal assessment is lower than the requirements prescribed by the regulator, the Bank maintains capital as per prescribed regulatory requirements.

UK OV1 - Overview of risk weighted exposure amounts

As at 31st March

	($ million)	Risk weighted exposure		Total own funds
		2024	2023	2024
1	Credit risk (excluding CCR)	629.0	666.7	50.3
2	Of which the standardised approach	629.0	666.7	50.3
3	Of which the foundation IRB (FIRB) approach	-	-	-
4	Of which slotting approach	-	-	-
UK 4a	Of which equities under the simple risk weighted approach	-	-	-
5	Of which the advanced IRB (AIRB) approach	-	-	-
6	Counterparty credit risk - CCR	0.2	0.3	-
7	Of which the standardised approach	0.2	0.3	-
8	Of which internal model method (IMM)	-	-	-
UK 8a	Of which exposures to a CCP	-	-	-
UK 8b	Of which credit valuation adjustment - CVA	0.1	0.1	-
9	Of which other CCR	-	-	-
15	Settlement risk	-	-	-
16	Securitisation exposures in the non-trading book (after the cap)	-	-	-
17	Of which SEC-IRBA approach	-	-	-
18	Of which SEC-ERBA (including IAA)	-	-	-
19	Of which SEC-SA approach	-	-	-
UK 19a	Of which 1,250% /deduction	-	-	-
20	Position, foreign exchange and commodities risks (Market risk)	11.6	11.2	0.9
21	Of which the standardised approach	11.6	11.2	0.9
22	Of which IMA	-	-	-
UK 22a	Large exposures	-	-	-
23	Operational risk	60.0	51.8	4.8
UK 23a	Of which basic indicator approach	60.0	51.8	4.8
UK 23b	Of which standardised approach	-	-	-
UK 23c	Of which advanced measurement approach	-	-	-
24	Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)	-	-	-
29	Total	701.0	730.1	56.0

UK CC1 - Composition of regulatory own funds

The table below uses the standard template issued by the PRA to show the composition of the Bank's own funds but only displays the rows of the template that are applicable.

As at 31st March

	($ million)	2024	2023	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
	Common Equity Tier 1 (CET1) capital: instruments and reserve			
1	Capital instruments and the related share premium accounts	274.6	274.6	(d)
	of which: ordinary shares	274.6	274.6	(d)
2	Retained earnings	(103.9)	(105.3)	(f)
3	Accumulated other comprehensive income (and other reserves)	(0.8)	(1)	(e)
UK-3a	Funds for general banking risk	-	-	
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	-	-	
5	Minority interests (amount allowed in consolidated CET1)	-	-	
UK-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-	-	
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	169.9	168.3	-
	Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value adjustments (negative amount)	-	(0.5)	
8	Intangible assets (net of related tax liability) (negative amount)	(0.2)	(0.2)	(a)
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	(24.9)	(25.0)	(b)
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-	-	
12	Negative amounts resulting from the calculation of expected loss amounts	-	-	
13	Any increase in equity that results from securitised assets (negative amount)	-	-	

	Common Equity Tier 1 (CET1) capital: regulatory adjustments continued	2024	2023	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-	-	
15	Defined-benefit pension fund assets (negative amount)	-	-	
16	Direct, indirect and synthetic holdings by an institution of own CET1 instruments (negative amount)	-	-	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
UK-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-	-	
UK-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	-	
UK-20c	of which: securitisation positions (negative amount)	-	-	
UK-20d	of which: free deliveries (negative amount)	-	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-	-	
22	Amount exceeding the 17,65% threshold (negative amount)	-	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	-	
25	of which: deferred tax assets arising from temporary differences	-	-	
UK-25a	Losses for the current financial year (negative amount)	-	-	
UK-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	-	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	-	

	Common Equity Tier 1 (CET1) capital: regulatory adjustments continued	2024	2023	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
27a	Other regulatory adjustments to CET1 capital (including IFRS 9 transitional adjustments when relevant)	(0.8)	0.6	-
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	(25.8)	(25.3)	-
29	**Common Equity Tier 1 (CET 1) capital**	**144.1**	**143.1**	**-**
	Additional Tier 1 (AT1) capital: regulatory adjustments			
30	Capital instruments and the related share premium accounts	45.0	45.0	(d)
31	of which: classified as equity under applicable accounting standards	45.0	45.0	-
32	of which: classified as liabilities under applicable accounting standards	-	-	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1 as described in Article 486(3) CRR	-	-	
UK-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	-	-	
UK-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1	-	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	-	
35	of which: instruments issued by subsidiaries subject to phase out	-	-	
36	Additional Tier 1 (AT1) capital before regulatory adjustments	45.0	45.0	-
	Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	-	-	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	-	
42a	Other regulatory adjustments to AT1 capital	-	-	

	Additional Tier 1 (AT1) capital: regulatory adjustments continued	2024	2023	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
43	Total regulatory adjustments to Additional Tier 1 (AT1) capital	-	-	
44	**Additional Tier 1 (AT1) capital**	**45.0**	**45.0**	-
45	**Tier 1 capital (T1= CET1+AT1)**	**189.1**	**188.1**	-
	Tier 2 (T2) capital: instruments and provisions			
46	Capital instruments and the related share premium accounts	50.0	50.0	(c)
47	Amount of qualifying items referred to in Article 484 (5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	-	-	
UK-47a	Amount of qualifying items referred to in Article 494a (2) CRR subject to phase out from T2	-	-	
UK-47b	Amount of qualifying items referred to in Article 494b (2) CRR subject to phase out from T2	-	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-	-	
49	of which: instruments issued by subsidiaries subject to phase out	-	-	
50	Credit risk adjustments	-	-	
51	Tier 2 (T2) capital before regulatory adjustments	50.0	50.0	-
	Tier 2 (T2) capital: regulatory adjustments			
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	-	-	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
UK-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	-	
UK-56b	Other regulatory adjustments to T2 capital	(16.0)	(11.7)	-

	Additional Tier 1 (AT1) capital: regulatory adjustments continued	2024	2023	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
57	Total Regulatory adjustments to Tier 2 (T2) capital	(16.0)	(11.7)	-
58	Tier 2 (T2) capital	34.0	38.3	-
59	Total capital (TC=T1+T2)	223.1	226.4	-
60	Total Risk exposure amount	701.0	730.1	-
	Capital ratios and buffers			
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	20.6%	19.6%	-
62	Tier 1 (as a percentage of total risk exposure amount)	27.0%	25.8%	-
63	Total capital (as a percentage of total risk exposure amount)	31.8%	31.0%	-
64	Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD) expressed as a percentage of risk exposure amount)	7.9%	7.9%	-
65	of which: capital conservation buffer requirement	2.5%	2.5%	-
66	of which: countercyclical buffer requirement	1.4%	0.7%	-
67	of which: systemic risk buffer requirement			
UK-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer			
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	14.2%	13.2%	-
	Amounts below the thresholds for deduction (before risk weighing)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	-	-	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	-	-	
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	-	-	
	Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	-	

	Applicable caps on the inclusion of provisions in Tier 2 continued	2024	2023	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-	-	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	-	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	-	
	Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
80	Current cap on CET1 instruments subject to phase out arrangements	-	-	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	-	
82	Current cap on AT1 instruments subject to phase out arrangements	-	-	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	-	
84	Current cap on T2 instruments subject to phase out arrangements	-	-	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	-	

UK CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements

As at 31st March

($ million)	Balance sheet as in 2024	Balance sheet as in 2023	Reference
Assets			
Cash and balances with central banks	134.0	144.8	
Loans and advances to banks	10.5	0.8	
Loans and advances to customers	772.1	748.7	
Investment securities – FVTPL	3.0	-	
Investment securities – FVOCI	72.9	55.3	
Investment securities – amortised cost	65.1	108.1	
Derivative financial instruments	-	-	
Right of use lease assets	3.7	4.4	
Prepayments and other receivables	0.6	0.5	
Property, plant and equipment	0.3	0.3	
Intangible assets	0.2	0.2	(a)
Deferred tax assets	24.9	25.0	(b)
Total Assets	**1,087.2**	**1,088.2**	
Liabilities			
Deposits from banks	3.3	2.0	
Deposits from customers	811.2	816.6	
Derivative financial instruments	0.2	0.1	
Current tax liability	-	-	
Lease liability	3.9	4.5	
Other liabilities	2.6	1.6	
Subordinated bonds and other borrowed funds	51.3	50.0	(c)
Total liabilities	**872.2**	**874.8**	
Shareholder's Equity			
Share capital	319.6	319.6	(d)
Fair value reserve	(0.8)	(1.0)	(e)
Retained earnings	(103.9)	(105.3)	(f)
Total shareholders' equity	**214.9**	**213.3**	

- The Bank's Pillar 3 disclosures are prepared on a solo basis. There is no subsidiary/joint venture of the Bank that is required to be consolidated for accounting or regulatory prudential purposes. The Bank's scope of accounting and regulatory consolidation is the same and hence columns (a) and (b) of the template UK CC2 have been merged for the disclosure above.
- Share capital includes additional tier 1 capital for $45 million (2023: $45 million).

UK CCA – Main features of capital instruments

As at 31st March 2023

		Equity Share Capital	Additional Tier 1 Capital Bonds	Additional Tier 1 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds
1	Issuer	Punjab National Bank (International) Limited	Punjab National Bank (International) Limited	Punjab National Bank (International) Limited	Punjab National Bank (International) Limited	Punjab National Bank (International) Limited	Punjab National Bank (International) Limited	Punjab National Bank (International) Limited	Punjab National Bank (International) Limited
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	Non Demat	Non Demat	Non Demat	Non Demat	Non Demat	Non Demat	Non Demat	Non Demat
2a	Public or private placement	Private	Private	Private	Private	Private	Private	Private	Private
3	Governing law(s) of the instrument	English Law	English Law	English Law	English Law	English Law	English Law	English Law	English Law
3a	Contractual recognition of write down and conversion powers of resolution authorities	NA	NA	NA	NA	NA	NA	NA	NA
	Regulatory treatment								
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier I	Additional Tier I	Additional Tier I	Tier II	Tier II	Tier II	Tier II	Tier II
5	Post-transitional CRR rules	Common Equity Tier I	Additional Tier I	Additional Tier I	Tier II	Tier II	Tier II	Tier II	Tier II
6	Eligible at solo/(sub-)consolidated/ solo&(sub-)consolidated	Solo	Solo	Solo	Solo	Solo	Solo	Solo	Solo
7	Instrument type (types to be specified by each jurisdiction)	Common Equity Tier I	Additional Tier I	Additional Tier I	Subordinated dated debt	Subordinated dated debt	Subordinated dated debt	Subordinated dated debt	Subordinated dated debt

		Equity Share Capital	Additional Tier 1 Capital Bonds	Additional Tier 1 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds
8	Amount recognised in regulatory capital or eligible liabilities (Currency in million, as of most recent reporting date)	274.6	25.0	20.0	12.5	3.5	12.5	0.8	4.7
9	Nominal amount of instrument	274.6	25.0	20.0	12.5	10.0	12.5	10.0	5.0
UK-9a	Issue price	USD 1/ GBP1	USD 1	USD 1	100%	100%	100%	100%	100%
UK-9b	Redemption price	NA	NA	NA	100%	100%	100%	100%	100%
10	Accounting classification	Equity share capital	Equity Share Capital	Equity Share Capital	Liabilities - Subordinated debt	Liabilities - Subordinated debt	Liabilities - Subordinated debt	Liabilities - Subordinated debt	Liabilities - Subordinated debt
11	Original date of issuance	Issued on various dates	Converted to AT1 on 15.03.16	31.03.2017	4.10.2022	30.12.2015	31.1.2022	19.8.2014	23.12.2013
12	Perpetual or dated	Perpetual	Perpetual	Perpetual	Dated	Dated	Dated	Dated	Dated
13	Original maturity date	Undated	Undated	Undated	10 Years	10 Years	10 Years	10 Years	15 Years
14	Issuer call subject to prior supervisory approval	NA	5 Years	5 Years	5 Years	NA	5 Years	NA	10 Years
15	Optional call date, contingent call dates and redemption amount	NA	Each interest payment date on or after 5 yrs.	Each interest payment date on or after 5 yrs.	Each interest payment date on or after 5 yrs.	NA	NA	NA	23.12.2023
16	Subsequent call dates, if applicable	NA	Nil	Nil	Nil	Nil	Nil	Nil	Nil
	Coupons / dividends								

		Equity Share Capital	Additional Tier 1 Capital Bonds	Additional Tier 1 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds
17	Fixed or floating dividend/coupon	NA	Floating	Floating	Floating	Floating	Floating	Floating	Floating
18	Coupon rate and any related index	Nil	6M SOFR + 500 bps	6M SOFR + 500 bps	6M SOFR+ 400 bps	6M SOFR + 450 bps	6M SOFR + 400 bps	6M SOFR + 450 bps	6M SOFR + 450 bps
19	Existence of a dividend stopper	Nil	Yes	Yes	Nil	Nil	Nil	Nil	Nil
UK-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully Discretionary	Fully Discretionary	Fully Discretionary	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
UK-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully Discretionary	Fully Discretionary	Fully Discretionary	Mandatory	Mandatory	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No	No	No	No	No	No
22	Noncumulative or cumulative	Non-cumulative	Non-Cumulative	Non-Cumulative	Cumulative	Cumulative	Cumulative	Cumulative	Cumulative
23	Convertible or non-convertible	NA	Convertible	Convertible	Non-Convertible	Non-Convertible	Non-Convertible	Non-Convertible	Non-Convertible
24	If convertible, conversion trigger(s)	NA	CET1 Ratio falls below required	CET1 Ratio falls below required	NA	NA	NA	NA	NA
25	If convertible, fully or partially	NA	Fully	Fully	NA	NA	NA	NA	NA
26	If convertible, conversion rate	NA	USD 1	USD 1	NA	NA	NA	NA	NA
27	If convertible, mandatory or optional conversion	NA	Mandatory	Mandatory	NA	NA	NA	NA	NA
28	If convertible, specify instrument type convertible into	NA	Ordinary Shares	Ordinary Shares	NA	NA	NA	NA	NA
		a	b	c	d	e	f	g	h

		Equity Share Capital	Additional Tier 1 Capital Bonds	Additional Tier 1 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds	Dated Tier 2 Capital Bonds
29	If convertible, specify issuer of instrument it converts into	NA	Punjab National Bank (International) Limited	Punjab National Bank (International) Limited	NA	NA	NA	NA	NA
30	Write-down feature	NA	Nil	Nil	Nil	Nil	Nil	Nil	Nil
31	If write-down, write-down trigger(s)	NA	NA	NA	NA	NA	NA	NA	NA
32	If write-down, full or partial	NA	NA	NA	NA	NA	NA	NA	NA
33	If write-down, permanent or temporary	NA	NA	NA	NA	NA	NA	NA	NA
34	If temporary write-down, description of write-up mechanism	NA	NA	NA	NA	NA	NA	NA	NA
34a	Type of subordination (only for eligible liabilities)	NA	NA	NA	Contractua l	Contractua l	Contractua l	Contractua l	Contractua l
UK-34b	Ranking of the instrument in normal insolvency proceedings	Additional Tier 1 capital bonds	Dated Tier 2 capital bonds	Dated Tier 2 capital bonds	Unsubordi nated creditors	Unsubordi nated creditors	Unsubordi nated creditors	Unsubordi nated creditors	Unsubordi nated creditors
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	First	Subordinated to all other creditors	Subordinated to all other Creditors	Subordinat ed to all other Creditors	Subordinat ed to all other Creditors	Subordinat ed to all other Creditors	Subordinat ed to all other Creditors	Subordinat ed to all other Creditors
36	Non-compliant transitioned features	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
37	If yes, specify non-compliant features	Nil	As above	As above	As above	As above	As above	As above	As above
37a	Link to the full term and conditions of the instrument (signposting)	Nil	Being perpetual, not to be amortised.	Being perpetual, not to be amortised.	To be amortised in the last five years.	To be amortised in the last five years.	To be amortised in the last five years.	To be amortised in the last five years.	To be amortised in the last five years.

IFRS 9 Transitional impact

The table below shows the capital, RWA and leverage positions with and without the application of transitional arrangements for IFRS 9.

As at 31st March

	($ million)	2024	2023
	Available Capital		
1	Common Equity Tier 1 (CET1) capital	144.1	143.1
2	Common Equity Tier 1 (CET1) capital as if IFRS 9 transitional arrangements had not been applied	144.1	142.5
3	Tier 1 capital	189.1	188.1
4	Tier 1 capital as if IFRS 9 transitional arrangements had not been applied	189.1	187.5
5	Total capital	223.1	226.4
6	Total capital as if IFRS 9 transitional arrangements had not been applied	223.1	225.8
	Risk-Weighted Assets		
7	Total risk-weighted assets	701.0	730.1
8	Total risk-weighted assets as if IFRS 9 transitional arrangements had not been applied	701.0	729.5
	Capital Ratios		
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	20.6%	19.6%
10	Common Equity Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 transitional arrangements had not been applied	20.6%	19.5%
11	Tier 1 (as a percentage of risk exposure amount)	27.0%	25.8%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 transitional arrangements had not been applied	27.0%	25.7%
13	Total capital (as a percentage of risk exposure amount)	31.8%	31.0%
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 transitional arrangements had not been applied	31.8%	30.9%
	Leverage Ratio		
15	Leverage ratio total exposure measure	987.7	942.9
16	Leverage ratio	19.1	19.9%
17	Leverage ratio as if IFRS 9 transitional arrangements had not been applied	19.1%	19.9%

9.3. Leverage Ratio

The leverage ratio measures capital adequacy by measuring the relationship between the Bank's Tier 1 capital and total assets (excluding claims on central banks). The UK leverage ratio as at 31st March 2024 excludes deposits at the central bank if they are matched by liabilities in the same currency and of identical or longer maturity.

The leverage ratio is not a binding requirement for the Bank. The PRA expects firms that do not have a binding requirement to maintain a leverage ratio to be above the minimum requirement of 3.25%. The Bank's leverage ratio as calculated in accordance with the UK leverage ratio framework was 19.1% as at 31st March 2024, well above the regulatory minimum applicable to larger UK banks.

Appendix - Compliance with UK CRR disclosures requirements

UK CRR reference	Disclosure requirement	Minimum Disclosure Requirement for PNBIL	PNBIL's compliance reference	Templates Applicable
Article 431 (1)	Requirement to publish Pillar 3 disclosures	✓	Pillar 3 published as required	
Article 431 (2)	Firms with special permissions must disclose the information required in Title III	✓	No special permissions obtained by the Bank	
Article 431 (3)	Institution must have a policy covering frequency of disclosures, their verification, comprehensiveness, and appropriateness. At least one senior manager must attest in writing that the policy is being followed.	✓	Pillar 3 - Overview section – Frequency and location, Verification and Supervision, Attestation	
Article 431 (4)	All quantitative disclosures must be accompanied by descriptive text where required to aid users' understanding.	✓	Wherever required, appropriate disclosure have been made	
Article 431 (5)	Explanation of ratings decision upon request	✓	As required in the course of business	
Article 432 (1)	Institutions may omit information that is not material if certain conditions are respected.	✓	Pillar 3 - Overview – Basis of disclosure	
Article 432 (2)	Institutions may omit information that is proprietary or confidential if certain conditions are respected.	✓	Pillar 3 - Overview – Basis of disclosure	
Article 432 (3)	Where 432 (2) applies, this must be stated in the disclosures, and more general information must be disclosed.	X	Not applicable	
Article 433	Institutions shall publish Pillar 3 in line with the rules. Disclosures must be published once a year at a minimum, and more frequently if necessary.	✓	Pillar 3 - Overview section Pillar 3 is published annually	
Article 433a	Disclosures by Large Institutions	X	Not applicable	
Article 433b	Disclosures by Small and Non-Complex Institutions	X	Not applicable	
Article 433c (1)	Institutions that are not subject to Article 433a or 433b shall disclose the information outlined below with the following frequency:	X	Not applicable	
Article 433c (1) (a)	all the information required under this Part on an annual basis;	X	Not applicable	

UK CRR reference	Disclosure requirement	Minimum Disclosure Requirement for PNBIL	PNBIL's compliance reference	Templates Applicable
Article 433c (1) (b)	the key metrics referred to in Article 447 on a semi-annual basis;	X	Not applicable	
Article 433c (1) (c)	Additional disclosure requirements for LREQ firms	X	Not applicable	
Article 433c (2)	Non-listed firms should follow Article 433c (2) and disclose the following:	✓	Refer to sub points	
Article 433c (2) (a)	points (a). (e) and (f) of Article 435(1);	✓	See Article 435	
Article 433c (2) (b)	points (a). (b) and (c) of Article 435(2);	✓	See Article 435	
Article 433c (2) (c)	point (a) of Article 437;	✓	See Article 437	
Article 433c (2) (d)	points (c) and (d) of Article 438;	✓	See Article 438	
Article 433c (2) (e)	the key metrics referred to in Article 447;	✓	See Article 447	
Article 433c (2) (f)	points (a) to (d). (h) to (k) of Article 450(1).	✓	See Article 450	
Article 434 (1)	To include all disclosures in one appropriate medium, or provide clear cross-references. Disclosures made under other requirements (e.g. accounting) can be used to satisfy Pillar 3 if appropriate.	✓	Pillar 3 disclosures and Annual Report are available on www.pnbint.com	
Article 434 (2)	Disclosures should be made available on firm's websites, kept for the same period as financial statements.	✓	www.pnbint.com	
Article 434a	[Note: Provision left blank]	X	Not Applicable	
Article 434b	Additional disclosure requirements for G-SII Firms	X	Not Applicable	
Article 435 (1)	Firm's must disclose information on risk management for each type of risk including;	✓	Pillar 3 - Risk management and governance section & Annual Report – Strategic Report section	Template UK OVA, OVB, LIQA, MRA, ORA and CRA

UK CRR reference	Disclosure requirement	Minimum Disclosure Requirement for PNBIL	PNBIL's compliance reference	Templates Applicable
Article 435 (1) (b)	Structure and organisation of risk management function	X	Not Applicable - Due to Article 433c(2)	
Article 435 (1) (c)	Risk reporting and measurement systems	X	Not Applicable - Due to Article 433c(2)	
Article 435 (1) (d)	Hedging and mitigating risk - policies and processes.	X	Not Applicable - Due to Article 433c(2)	
Article 435 (1) (e)	Adequacy of risk management arrangements.	✓	Pillar 3 - Risk management and governance section & Annual Report – Strategic Report section	Template UK OVA and OVB
Article 435 (1) (f)	Concise risk statement approved by the Board.	✓	Pillar 3 - Risk management and governance section	Template UK OVA and OVB
Article 435 (1) (f) (i)	Key metrics for external stakeholders to get a comprehensive view of the firm's risk management.	✓	Pillar 3 – Appendix 1 – Key metrics	Template UK KM1
Article 435 (1) (f) (ii)	Information on intragroup and related party transactions.	X	Not Applicable	
Article 435 (2)	Information on governance arrangements, including information on Board composition and recruitment, and risk committees.	✓	Refer to sub points	Template UK OVA and OVB
Article 435 (2) (a)	Number of directorships held by directors.	✓	Pillar 3 - Risk management and governance section	Template UK OVA and OVB
Article 435 (2) (b)	Recruitment policy of the Board, their experience and expertise.	✓	Pillar 3 – Remuneration disclosure and on the Bank's website - www.pnbint.com/PNBIL/About-Us/Directors-Profiles	
Article 435 (2) (c)	Policy on diversity of management body	✓	Pillar 3 –Risk management and governance section	Template UK OVA and OVB
Article 435 (2) (d)	Disclosure of whether a dedicated risk committee is in place, and number of meetings in the year.	✓	Pillar 3 - Risk management and governance section	
Article 435 (2) (e)	Description of information flow risk to Board.	✓	Pillar 3 - Risk management and governance section	

UK CRR reference	Disclosure requirement	Minimum Disclosure Requirement for PNBIL	PNBIL's compliance reference	Templates Applicable
Article 436	Disclosure of the Scope of Application	✓	Pillar 3 - Overview section	
Article 437	Requirement to disclose following information regarding own funds:	✓	Pillar 3 - Appendix 3 and Appendix 4	Template UK CC1 and CC2
Article 437 (a)	Reconciliation of regulatory values for Common Equity Tier 1 items, Additional Tier 1 items, Tier 2 items and filters and deductions to audited financial statements	✓	Pillar 3 - Appendix 3 and Appendix 4	Template UK CC1 and CC2
Article 437 (b)	Description of the main features of Capital Instruments issued by institution;	✓	Pillar 3 - Appendix 5	Template UK CCA
Article 437 (c)	Full terms and conditions of Capital Instruments issued by institution;	✓	Pillar 3 - Appendix 5	Template UK CCA
Article 437 (d)	Disclosure of the nature and amounts of the following:	X	Not Applicable - Due to Article 433c(2)	
Article 437 (d) (i)	each prudential filter applied	X	Not Applicable - Due to Article 433c(2)	
Article 437 (d) (ii)	each capital deduction applied	X	Not Applicable - Due to Article 433c(2)	
Article 437 (d) (iii)	items not deducted from capital	X	Not Applicable - Due to Article 433c(2)	
Article 437 (e)	a description of all restrictions applied to the calculation of own funds in accordance with this regulation and the instruments, prudential filters and deductions to which those restrictions apply;	X	Not Applicable - Due to Article 433c(2)	
Article 437 (f)	where institutions disclose capital ratios calculated using elements of own funds determined on a different basis.	X	Not Applicable - Due to Article 433c(2)	
Article 437a	Disclosure of Own Funds and Eligible Liabilities	X	Not Applicable - Due to Article 433c(2)	
Article 438	Requirement to disclose following information regarding capital adequacy:	✓	Refer to sub points	
Article 438 (a)	Summary of institution's approach to assessing adequacy of capital levels.	X	Not Applicable - Due to Article 433c(2)	
Article 438 (b)	Additional own funds requirements specified by the regulator and its composition	X	Not Applicable - Due to Article 433c(2)	

UK CRR reference	Disclosure requirement	Minimum Disclosure Requirement for PNBIL	PNBIL's compliance reference	Templates Applicable
Article 438 (c)	The result of the ICAAP	✓	Pillar 3 - Capital requirements section	Template UK OVC
Article 438 (d)	Total risk weighted exposure and own funds requirements by risk category	✓	Pillar 3 - Capital requirements section - Appendix 2	Template UK OV1
Article 438 (e)	Exposures, risk weighted exposure and expected losses for specialised lending and equity exposures	X	Not Applicable - Due to Article 433c(2)	
Article 438 (f)	Exposure details on instruments held in any insurance related company	X	Not Applicable - Due to Article 433c(2)	
Article 438 (g)	Additional capital requirements for financial conglomerates	X	Not Applicable - Due to Article 433c(2)	
Article 438 (h)	Changes in risk weighted exposure from prior period calculated by internal models	X	Not Applicable - Due to Article 433c(2)	
Article 439	Disclosure of Exposures to Counterparty Credit Risk	✓	Pillar 3 – Counterparty credit risk section	
Article 440	Disclosure of Countercyclical Capital Buffers	✓	Pillar 3 – Capital requirements – Capital buffers section	
Article 441	Disclosure of Indicators of Global Systemic Importance	X	Not Applicable - Due to Article 433c(2)	
Article 442	Disclosure of Exposures to Credit Risk and Dilution Risk	✓	Pillar 3 – Credit Risk section, Appendix 7 and Appendix 8, Annual Report – note 24	Template UK CQ3 and CR1
Article 443	Disclosure of Encumbered and Unencumbered Assets	X	Not Applicable - Due to Article 433c(2)	
Article 444	Disclosure of the Use of the Standardised Approach	X	Not Applicable - Due to Article 433c(2)	
Article 445	Disclosure of Exposure to Market Risk	✓	Pillar 3 – Market Risk section	
Article 446	Disclosure of Operational Risk Management	✓	Pillar 3 – Operational Risk section	
Article 447	Requirement to publish the following key metrics;	✓	Refer to sub points	
Article 447 (a)	Composition of own funds amounts and requirements	✓	Pillar 3 – Appendix 1 – Key Metrics	Template UK KM1

UK CRR reference	Disclosure requirement	Minimum Disclosure Requirement for PNBIL	PNBIL's compliance reference	Templates Applicable
Article 447 (a)	Composition of own funds amounts and requirements	✓	Pillar 3 – Appendix 1 – Key Metrics	Template UK KM1
Article 447 (b)	Risk exposure amounts	✓	Pillar 3 – Appendix 1 – Key Metrics	Template UK KM1
Article 447 (c)	Additional own funds requirements and composition required in line with regulation 34(1) of the Capital Requirements Regulations	✓	Pillar 3 – Appendix 1 – Key Metrics	Template UK KM1
Article 447 (d)	Combined buffer requirements	✓	Pillar 3 – Appendix 1 – Key Metrics	Template UK KM1
Article 447 (e)	The following information regarding the leverage ratio;	✓	Pillar 3 – Appendix 1 – Key Metrics	Template UK KM1
Article 447 (e) (i)	Leverage ratio and exposure	✓	Pillar 3 – Appendix 1 – Key Metrics	Template UK KM1
Article 447 (e) (iii)	Additional requirements from Article 451 for LREQ firms	X	Not Applicable	
Article 447 (f)	The following information regarding the liquidity coverage ratio;	✓	Pillar 3 – Appendix 1 – Key Metrics	Template UK KM1
Article 448	Disclosure of exposures to interest rate risk on position not held in the trading book	X	Not Applicable – Due to Article 433c(2)	
Article 449	Disclosure of Exposure to Securitisation Positions	X	Not Applicable	
Article 450 (1)	Disclosure of Remuneration policy	✓	Refer to sub points	Template UK REMA
Article 450 (1) (a)	Decision-making process for determining remuneration policy	✓	Pillar 3 – Remuneration disclosure	
Article 450 (1) (b)	Link between pay and performance	✓	Pillar 3 – Remuneration disclosure	
Article 450 (1) (c)	Design characteristics of the remuneration system, criteria for performance measurement, risk adjustment, deferral policy and vesting criteria	✓	Pillar 3 - Remuneration disclosure	
Article 450 (1) (d)	Ratios between fixed and variable remuneration	X	Not applicable	

UK CRR reference	Disclosure requirement	Minimum Disclosure Requirement for PNBIL	PNBIL's compliance reference	Templates Applicable
Article 450 (1) (e)	Performance criteria on which entitlement to shares, options or variable components of remuneration is based	X	Not Applicable	
Article 450 (1) (f)	Parameters and rationale for variable components Schemes and other non-cash benefits	X	Not Applicable	
Article 450 (1) (g)	Aggregate quantitative information on remuneration	✓	Pillar 3 - Remuneration disclosure	
Article 450 (1) (h)	Aggregate quantitative information on remuneration, broken down by senior management and members of staff with significant impact on risk profile of the institution	✓	Refer to sub points	
Article 450 (1) (h) (i)	The amounts of remuneration for the financial year, split into fixed and flexible and number of beneficiaries	✓	Pillar 3 - Remuneration disclosure	
Article 450 (1) (h) (ii)	The amounts of outstanding deferred remuneration, split into vested and unvested	X	Not Applicable	
Article 450 (1) (h) (iii)	The amounts of outstanding deferred remuneration, split into vested and unvested	X	Not Applicable	
Article 450 (1) (h) (iv)	The amounts of deferred remuneration due to vest in the financial year and the number of beneficiaries	X	Not Applicable	
Article 450 (1) (h) (v)	Guaranteed variable remuneration awarded in the financial year and the number of beneficiaries	X	Not Applicable	
Article 450 (1) (h) (vi)	Severance payments awarded in prior years, paid out in this financial year	X	Not Applicable	
Article 450 (1) (h) (vii)	The amount of severance payments awarded during the financial year, number of beneficiaries and highest award	✓	Pillar 3 - Remuneration disclosure	
Article 450 (1) (i)	The number of individuals been remunerated EUR 1 million or more, between EUR 1 and 5 million and of EUR 5 million or above	✓	Pillar 3 - Remuneration disclosure	
Article 450 (1) (j)	Upon demand from the relevant Member State or competent authority, the total remuneration for each member of the management body or senior management	X	Not Applicable	
Article 450 (1) (k)	Information on if the institution benefits from the derogation laid out in the Remuneration part of the PRA Rulebook	✓	Pillar 3 – Remuneration disclosure	

	executives.			
UK CRR reference	Disclosure requirement	Minimum Disclosure Requirement for PNBIL	PNBIL's compliance reference	Templates Applicable
Article 451	Disclosure of the Leverage Ratio	✓	Pillar 3 – Leverage ratio section and Appendix 1 – Key Metrics	Template UK KM1
Article 451a	Disclosure of Liquidity Requirements	✓	Pillar 3 – Liquidity section	
Article 452	Disclosure of the Use of the IRB Approach to Credit Risk	X	Not applicable	
Article 454	Disclosure of the Use of the Advanced Measurement Approaches to Operational Risk	X	Not applicable	
Article 455	Use of Internal Market Risk Models	X	Not applicable	