PILLAR III DISCLOSURES

NCB CAPITAL GROUP

March 2019

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1 Scope of Application

NCB Capital Company (hereinafter referred as "NCBC" or "the Firm") is a subsidiary of The National Commercial Bank (NCB), Saudi Arabia. The Firm is authorized by the Capital Market Authority of the Kingdom of Saudi Arabia ("CMA") with a license number 37-06046 to carry out dealing, as principal and agent, and underwriting, managing, arranging, advising and custody, with respect to securities. Formed in accordance with the Capital Market Authority's Resolution No. 2-83-2005 dated 21 Jumad Al-Awal 1426H (28 June 2005), NCBC was the first investment Firm to obtain a CMA license.

The Pillar III disclosures contained herein relate to the Firm including the following subsidiaries as of the year ending December 31, 2018.

Entity Name	Capital	Ownership Percentage	Objective	Domicile of Residence & Place of Business
NCB Capital Real Estate Investment Company	SAR 10,000	100%	Hold and register real estate on behalf of real estate funds	Saudi Arabia
NCB Capital Dubai Inc.	USD 2,500,000	100%	Investment management services	DIFC, Dubai
The Capital Partnership (Cayman) Holdings Limited (SPV) *	USD 50,000	100%	Investment	Cayman Islands
ORYX Regional Private Equity Fund*	BD 1,000	50%	Fund Company	Bahrain
BACO WLL*	BD 20,000	100%	Employee Investment Scheme Programme	Bahrain

*Some of the Subsidiaries are created by NCB Capital as Special Purpose Vehicles (SPVs) which do not have real commercial activities.

Table 1 – Subsidiaries

This report is compiled in accordance with CMA's Prudential Rules and the format of the report is in line with the CMA's recommended format for Pillar III qualitative and quantitative risk disclosures.

1.1 Pillar I – Minimum capital requirements

Pillar I sets minimum capital requirements to meet Credit, Market and Operational risks.

- NCBC used the Standardized Approach in the calculation of the capital required for Credit risk.
- The Firm's Market risk capital charge covers CMA defined categories such as Equity risk, Fund risk, FX risk and Excess Exposure risk. The capital charge for Market risk is assessed for each risk category separately in accordance with the rules prescribed by CMA.
- With regards to Operational risk, the Firm has adopted the Basic Indicator Approach (BIA) in compliance with CMA requirements which is a more conservative approach than the Expenditure Based Approach (EBA) as it leads to a higher operational risk capital charge.

1.2 Pillar II – Internal Capital Adequacy Assessment Process (ICAAP)

ICAAP is introduced under Pillar II of the Prudential Rules set by CMA, which is contained in Part 6 (Article 66) and Annex 9. Pillar II requires Authorized Persons (AP) to perform a thorough review of its material risks, stress testing, strategic capital plans, corporate governance, the internal control framework as well as the roles and responsibilities of departments/ individuals that are critical to the implementation of ICAAP framework.

The Firm has taken various initiatives to implement ICAAP and assess capital requirements in accordance with its risk profile, size and complexity of operations.

1.3 Pillar III – Market discipline

Pillar III provides a detailed risk reporting and disclosure framework that enhances market discipline. The disclosures are intended to enhance transparency and facilitate an objective assessment of NCBC by its stakeholders, including but not limited to shareholders, regulators, analysts, clients, counterparties and the general market and industry. This is an effective means of informing the market about the Firm's exposure to risks and enhances transparency and peer comparability.

The information provided in this report has been prepared by Risk and reviewed by Finance, Compliance and Internal Audit Departments, with additional reviews by the Firm's senior management and Board Risk Committee. Moreover, the report has been prepared in accordance with the disclosure rules in force at the time of publication, covering both the qualitative and quantitative items.

NCBC updates and publishes the Pillar III risk disclosure report on its website annually.

1.4 Material or Legal Impediments between AP and its Subsidiaries

NCBC does not have any material or legal impediments affecting the prompt transfer of capital or repayment of liabilities with any of its subsidiaries.

2 Capital Structure

For regulatory purposes, capital is categorized into two main classes: Tier-1 and Tier-2 as described below.

2.1 Tier-1 Capital

Tier-1 capital consists of paid-up capital, reserves (other than revaluation reserves), and audited retained earnings and has deductions in the form of dividend expense from retained earnings and negative equity items.

As of 31st December 2018, the total Tier-1 capital of the Firm is SAR 1,037 million (31st Dec. 2017: SAR 918 million).

Tier-1 capital	2018	2017
	SAR '000	
Paid-up capital	1,000,000	1,000,000
Audited retained earnings	169,790	63,838
Share premium	-	-
Reserves (other than revaluation reserves)	167,248	134,248
Tier-1 capital contribution	-	-
Deductions from Tier-1 capital	(300,279)	(280,580)
Total Tier-1 capital	**1,036,759**	**917,506**

Table 2 – Tier-1 Capital

2.2 Tier-2 Capital

As of 31st December 2018, the total Tier-2 capital of the Firm is SAR Nil (31st Dec. 2017: SAR Nil).

Tier-2 capital	2018	2017
	SAR '000	
Subordinated loans	-	-
Cumulative preference shares	-	-
Revaluation reserves	-	-
Other deductions from Tier-2 (-)	-	-
Deduction to meet Tier-2 capital limit (-)	-	-
Total Tier-2 capital	**-**	**-**
TOTAL CAPITAL BASE (Tier-1 & 2)	**1,036,759**	**917,506**

Table 3 – Tier-2 Capital and Total Capital Base

Please refer to Appendix 1 for the detailed disclosure on capital base.

3 Capital Adequacy

NCBC views capital adequacy as paramount to cover unexpected losses and hence maintains adequate levels of capital to cover risks inherent in its business operations and to support current and future activities.

3.1 Capital Adequacy Ratio and Minimum Capital Requirements

As illustrated in the table below, for the year ending 31st December 2018, the Firm was adequately capitalized with a Tier-1 capital ratio of 1.95x (31st Dec. 2017: 2.14x) and a total capital ratio of 1.95x (31st Dec. 2017: 2.14x). This is well above CMA's minimum requirement of 1.00x.

(All amounts in SAR '000)

Particulars	2018	2017	% Change
Tier-1 Capital	1,036,759	917,506	13.0%
Tier-2 Capital	-	-	-
Total	1,036,759	917,506	13.0%
Minimum capital required			
Market Risk	80,184	133,720	-40.0%
Credit Risk	352,814	200,167	76.3%
Operational Risk	97,702	95,501	2.3%
Total	**530,701**	**429,388**	**23.6%**
Tier-1 Capital Ratio	1.95x	2.14x	-9%
Total Capital Ratio	1.95x	2.14x	-9%
Surplus (Deficit) in Capital Base	506,058	488,118	3.7%

Table 4 – Comparison of Capital Adequacy and Capital Numbers – 2018 vs. 2017

Please refer to Appendix 2 for more detailed disclosures on capital adequacy.

3.2 ICAAP

NCBC has an ICAAP process in which it examines its risk profile from primarily a capital adequacy point of view. In addition, the Firm has a Board approved Capital Management Policy defining the ICAAP framework. The ICAAP at the Firm evaluates the Firm's business strategy, its forecasts for risk-weighted assets for the next three years, its risk appetite and the assessment of specific risk exposures, their mitigation, and the capital allocated to these risks. The ICAAP is a crucial part of the Firm's strategic decision-making process and risk management framework. ICAAP results are updated and reviewed by senior management and the board on an annual basis.

3.3 Scenario Analysis and Stress Testing

Scenario analysis and stress testing refer to various techniques (quantitative and/ or qualitative) used by the Firm to assess its susceptibility to exceptional but probable events. It is a risk management technique used to evaluate the potential effects of specific events and/or movement in a set of financial variables on the Firm's financial condition. NCBC has in place a robust stress testing process that ensures that sufficiently adverse scenarios are considered while testing the resilience and the ability of the Firm to absorb such shocks. Senior Management is regularly informed of the stress test outcomes for key risks to ensure that any unacceptable risks are mitigated.

4 Risk Management

Risk management is an integral function within NCBC encompassing all risk groups. The mission of Risk Management Division at NCBC is to develop and maintain programs that protect the Firm from unanticipated losses. This involves establishing and strengthening the risk management practices at NCBC as well as to create robust risk infrastructure at the Firm for various stakeholders.

4.1 Scope of Risk Management

4.1.1 Structure and organization of Risk Management

At NCBC, the Risk Management function is independent from business and is led by the Head of Risk who reports directly to the CEO with a dotted line to the Board Risk Committee. NCBC's Risk Management Structure is described in Figure 1 below.

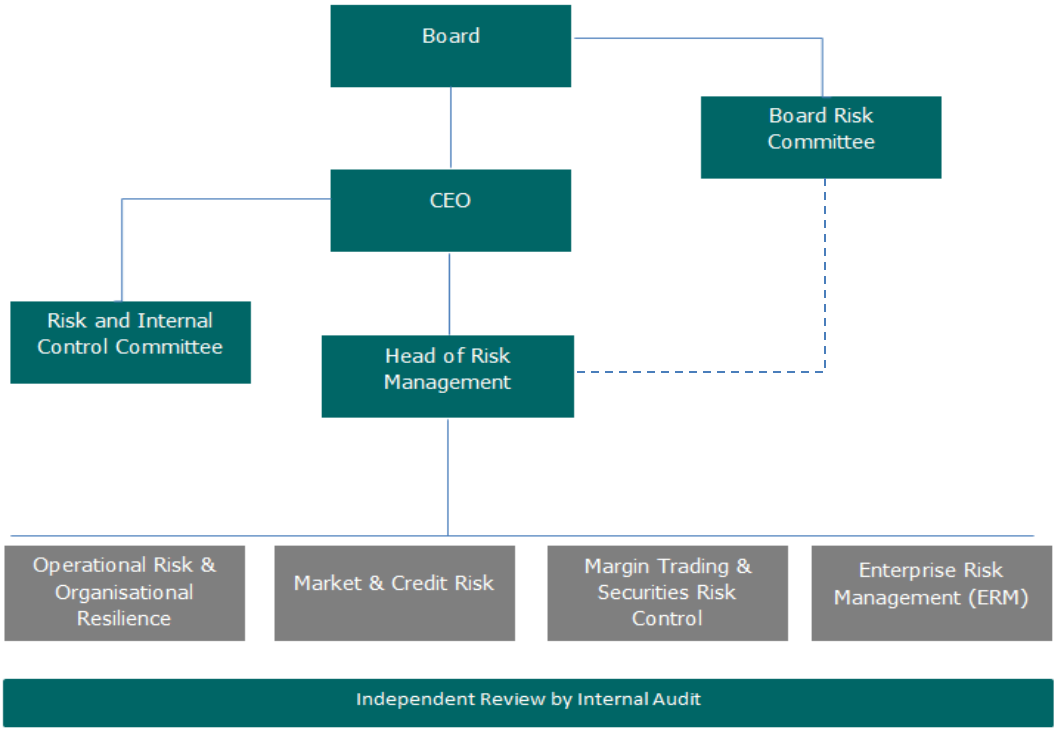

Figure 1 - Risk Management Structure at NCBC

The Head of Risk is responsible for the overall risk management function at department as well as organization level. Risk Management Division acts as the coordinator and main driver with respect to the ICAAP and the department's roles and responsibilities in that regard are as follows:

- Management of Market, Credit, Fiduciary and Operational risks across business lines (Securities, Asset Management, Wealth Management, and Investment Banking);
- Risk oversight on treasury balance sheet management including credit, market, liquidity risk and capital management;
- Ensuring NCBC's adherence to capital adequacy guidelines mandated by CMA;
- Monitoring liquidity risk at organizational level as well as business unit levels; and

- Independent review of Capital Adequacy Module (Pillar I) regulatory reporting, development and implementation of the ICAAP framework (Pillar II), as well as development and update of the Risk Disclosure (Pillar III).

4.1.2 NCBC Risk Governance

NCBC's complete corporate governance structure and framework is shown in Figure 2 below.

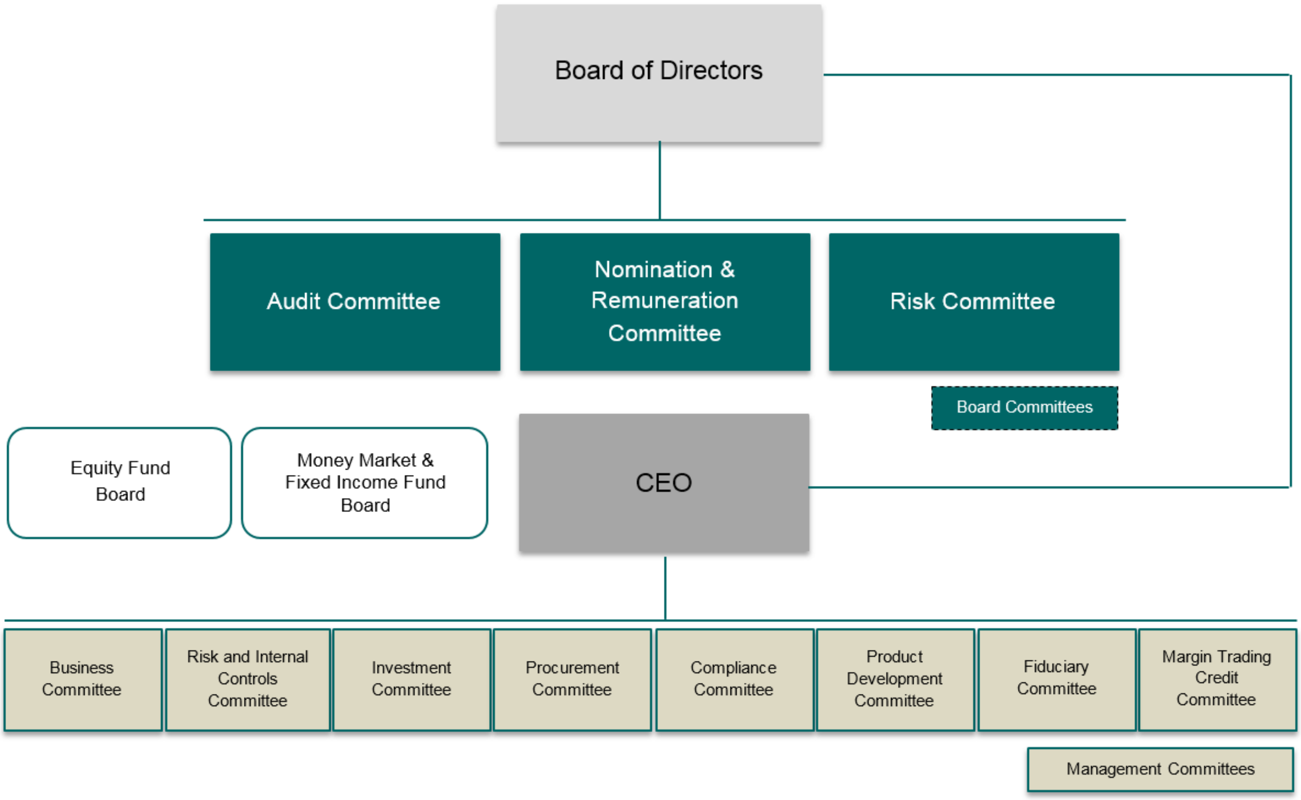

Figure 2 - NCBC Corporate Governance Framework and Structure

Board Risk Committee ("BRC")

The BRC assists the Board in discharging its risk management oversight. The Board subcommittee's mandate includes but is not limited to the following:

- Annually review and recommend for Board approval risk management strategy, risk management policies, risk appetite and limits;
- Annually review risk management structures and annual operating plans;
- Quarterly review of risk management reports incorporating credit, market and liquidity risks, operational risk, information security risk, concentration risk, capital adequacy, fiduciary risk and margin trading;
- Annually review and recommend for Board approval the ICAAP report and quarterly review of capital adequacy monitoring; and
- Approve and oversight the Enterprise Risk Management framework and set the risk culture of NCBC.

The Board established the subcommittee in recognition of its obligations to ensure proper Board risk management oversight and alignment of risk governance, risk appetite, and overall capital management. Members of the Board Risk Committee are appointed by the Board. The Head of Risk is not a member of the Board Risk Committee, but an invitee. The committee meets at a minimum four times in a year.

Fiduciary Committee

The Fiduciary Committee is a management level committee that has responsibility to provide oversight over the discharge of fiduciary obligations and standard of care (relating to, among other things, loyalty, conflict of interest, skill and diligence) as defined for the products and services in NCBC service charter. The Committee is chaired by the Head of Wealth Management and its membership is appointed by the CEO and includes the Head of Finance, Head of Compliance, Head of Risk and Head of Legal and other invitees.

Risk and Internal Control Committee ("RICC")

The RICC is a management level committee that has responsibility and oversight of the Firm's internal control framework focusing mostly on operational risk related issues. The Committee is chaired by the Head of Risk and its membership is appointed by the CEO and includes the Head of Compliance, Head of Legal, Head of Finance, Head of Securities, and Head of Operations and other invitees.

Margin Trading Credit Committee ("MTCC")

The Margin Trading Credit Committee provides oversight and approval of margin trading facilities within its authorities. The Committee is chaired by the CEO and other members include Head of Risk, Head of Compliance, Head of Finance, and Head of Securities (as non-voting).

Other Governance Arrangements

Further to the above, and to ensure proper risk coverage and oversight, the Head of Risk is a member of various other governance bodies within the Firm including;

- Product Development Committee ("PDC"), which is responsible for oversight of introduction, review and termination of NCBC products;
- Investment Committee, which is responsible for treasury balance sheet management and oversight including capital and liquidity management; and
- Business Committee, which is responsible for to review the Firm's financial performance and Strategy.

In addition to the above, and as part of the public funds governance framework, the Head of Risk provides risk management feedback to the Equity and Money Market & Fixed Income Fund Boards.

4.1.3 Risk Management Strategies and processes

NCBC's risk management framework encompasses all of the activities at the Firm that affect its risk profile. Risk management is the process by which the Firm identifies, measures, controls and monitors its risk exposures. These include decisions and actions to avoid, mitigate, transfer, insure against, put limits on or explicitly assume risk. Thus, risk management may be viewed as a "life cycle" which includes the following four stages: **Risk Identification**, **Risk Measurement**, **Risk Management**, and **Risk Monitoring & Reporting**.

Figure 3 - Risk Management Lifecycle

The Firm's strategic objective is to optimize the risk / return trade-off by either maximizing return for a given level of risk or minimizing the risk for a desired level of return.

4.1.4 Scope and nature of risk reporting and measurement systems

The primary goal of risk management is to ensure that NCBC's asset and liability profile, its trading positions, its credit and operational activities do not expose it to losses that could threaten the viability of the Firm. Risk management helps ensure that risk exposures do not become excessive relative to the Firm's capital position and its financial position.

NCBC's risk monitoring relies on reports containing internal financial, operational, and compliance data, as well as external market information about events and conditions that are relevant for decision-making. The reports are distributed at appropriate levels of management. The reports reflect any identified problem area and motivate timely corrective action on outstanding issues. The reports are analysed with a view to improve existing risk management performance as well as to develop new risk management policies and procedures.

NCBC periodically reviews its risk limitation and control strategies and adjusts the Firm's risk profile accordingly using appropriate strategies in light of the overall risk appetite. Risk identification, evaluation, and management in respect of particular activities are carried out in accordance with internal processes. Risks are assessed with reference to the Firm's strategic priorities, taking into account the likelihood of the risk occurring, potential impact and the range of implications.

4.1.5 Policies and guidelines for monitoring and mitigating risks

NCBC has established risk policies and limits to monitor risks across various businesses and at the Firm level. Risk limits are thresholds to monitor that actual risk exposure does not deviate from the Firm's Risk Appetite. Exceeding risk limits typically acts as a trigger for management action. This requires a firm to consider at a more granular level how much risk individual units should be allowed to take. Changes in the regulatory requirements (e.g. new capital or liquidity requirements) lead to internal reviews of their impact which could ultimately lead to a fundamental revision of the Firm's Risk Appetite.

4.2 Credit risks

The Credit risk is defined as the risk of loss resulting from a drop in credit worthiness of issuers of securities, counterparties and any debtors to which authorized persons are exposed. It is the potential risk of a counterparty failing to meet its obligations in accordance with agreed terms.

4.2.1 Counterparty Credit Risk

Counterparty credit risk is managed through an established and approved counterparty risk framework, including approved counterparty limits and monitoring by the Risk Management Division. Whilst the limits are set up as part of annual limit review exercise, they are monitored for utilization, rating developments and compliance by Risk Management on a daily basis.

4.2.2 Margin Trading Credit Risk

NCBC has instituted a margin trading risk and governance framework for the management of credit risk arising from margin trading. Margin trading credit risk acceptance falls under the general oversight of the MTCC at management level, with escalation to BRC and Board. The margin program is operated under clearly defined guidelines with respect to product suitability and client credit profile. Risk Management Division monitors the program on a daily basis including review and approval of proposals within preapproved authority limits, credit profile checks, concentration limit monitoring, margin management and periodic updates of eligible collateral.

4.2.3 Treasury Investments

With regards to treasury investments (balance sheet management), separate limits apply to counterparty exposures and these are monitored independently by Risk Management.

4.2.4 Credit Risk capital charge

NCBC has complied with CMA regulations and used the Standardized Approach in the calculation of the capital required for Credit risk. Please refer to Appendix 3 for more details on the Credit Risk Capital Charge.

4.2.5 External ratings

For credit exposures, the relevant counterparties' rating bands are also considered as per the rating of external agencies. In the use of external ratings, NCBC recognizes four Credit Rating Agencies ("CRAs"), as per the CMA Prudential Rules, which are Standard and Poor's ("S&P"), Fitch, Moody's and Capital Intelligence. The Risk Management policy also maintains an external conversion and ratings sheet for parity amongst the rating agencies approved by the CMA.

4.2.6 Credit quality steps

In compliance with CMA Prudential Regulations, NCBC uses credit quality steps to determine appropriate risk weights for credit risk exposures for capital charge calculations. To identify the credit quality step the Firm uses the following correspondence table between the credit rating agency's credit ratings and the steps in the credit quality scales as prescribed by CMA.

Credit Quality Step	1	2	3	4	5	6
Standards & Poor's	AA- to AAA	A- to A+	BBB- to BBB+	BB- to BB+	B- to B+	CCC+ and below
Fitch	AA- to AAA	A- to A+	BBB- to BBB+	BB- to BB+	B- to B+	CCC+ and below
Moody's	Aa3 to Aaa	A3 to A1	Baa3 to Baa1	Ba3 to Ba1	B3 to B1	Caa1 and below
Capital Intelligence	AAA	A to AA	BBB	BB	B	C and below

Table 5 – Credit Quality Steps and CRA's Rating Mapping

Please refer to Appendix 4 for the details. Note that NCBC considers only long-term ratings for Capital Charge calculation.

4.2.7 Past Due

NCBC defines a financial asset as 'Past Due' when the counterparty has failed to make a payment that is contractually due. As of 31st December 2018, the Firm's total past due credit exposures is SAR 34,992 (31st Dec. 2017: SAR 30,369).

4.2.8 Impairments and Specific Provisions

The Firm exercises judgment to consider impairment on the available-for-sale investments. This includes determination of a significant or prolonged decline in the fair value below cost. The determination of what is 'significant' or 'prolonged' is done in accordance with approved internal guidelines. In addition, the Firm considers impairment to be appropriate when there is evidence of deterioration in the financial health of the investee, industry and sector performance, changes in technology, and operational and financing cash flows. The Firm has recognized no impairment loss as of 31st December 2018 on available-for-sale investments in the consolidated statement of income (31st Dec. 2017: SAR Nil).

4.2.9 IFRS 9 and Expected Credit Loss ("ECL")

Arising from new regulatory and accounting requirements with respect to the implementation of International Financial Reporting Standard Number 9 ("IFRS 9") the Firm has developed a methodology for computing ECL provisions on all credit exposures including on own products and all client related products where IFRS 9 is mandatory for client financial reporting purposes.

4.2.10 Geographic Distribution of Exposures

NCBC has about 85% of its assets in the Kingdom of Saudi Arabia. The geographic distribution of NCBC's assets and liabilities is given in the table below:

(All amounts in SAR '000 as of 31st Dec. 2018)

Exposure Class	Totals	Kingdom of Saudi Arabia	United Arab Emirates	Egypt	North America	Other Regions
Balances with banks	126,471	43,238	24,399	-	2	58,832
Murabaha Financing	250,882	250,882	-	-	-	-
Investments	693,315	594,365	18,908	-	80,042	-
Prepayments and other assets	191,600	177,553	14,047	-	-	-
Investment in an associate	29,605	-	-	15,984	-	13,621
Property and equipment	188,294	187,512	782	-	-	-
Total Assets	**1,480,167**	**1,253,550**	**58,136**	**15,984**	**80,044**	**72,453**
Dividend payable	14,568	14,568	-	-	-	-
Amount due to The NCB	37,185	37,185	-	-	-	-
Account payable and accruals	228,002	201,348	26,458	-	-	196
Employee benefits	51,651	49,467	2,184	-	-	-
Total Liabilities	**331,406**	**302,568**	**28,642**	**-**	**-**	**196**

(All amounts in SAR '000 as of 31st Dec. 2017)

Exposure Class	Totals	Kingdom of Saudi Arabia	United Arab Emirates	Egypt	North America	Other Regions
Balances with banks	150,030	55,690	38,815	-	2,082	53,443
Murabaha Financing	78,577	78,577	-	-	-	-
Investments	736,939	680,359	-	-	56,580	-
Prepayments and other assets	133,606	115,089	18,517	-	-	-
Investment in an associate	31,825	-	14,510	17,315	-	-
Property and equipment	170,383	170,383	-	-	-	-
Total Assets	**1,301,360**	**1,100,098**	**71,842**	**17,315**	**58,662**	**53,443**
Dividend payable	14,635	14,635	-	-	-	-
Amount due to The NCB	8,261	8,261	-	-	-	-
Account payable and accruals	210,177	183,528	26,458	-	-	191
Employee benefits	61,818	61,818	-	-	-	-
Total Liabilities	**294,891**	**268,242**	**26,458**	**-**	**-**	**191**

Table 6 – Distribution of Exposures by Geography

4.3 Credit Risk Mitigation

Any credit risk mitigation related transaction comes under purview of both Risk Management and Legal Divisions in terms of documentation. Risk Management as an independent risk function performs internal credit reviews before business units engage in transactions with new potential counterparties. Credit guidelines at NCBC ensure that limits are approved for only those counterparties that meet the appropriate credit criteria and credit review is conducted periodically.

As of 31st December 2018, NCBC has margin trading financing with outstanding exposure of SAR 250.88 million (31st Dec 2017: SAR 78.57 million), which is secured against the pledge of shares and cash.

Please refer to Appendix 5 for details on Credit Risk Exposure before and after Credit Risk Mitigation.

4.4 Counterparty Credit Risk (CCR) and Off Balance Sheet Exposures

As of 31st December 2018, NCBC does not have any exposures to Over the Counter ("OTC") derivatives, repos and reverse repos and securities borrowing/ lending (31st Dec. 2017: SAR Nil).

With regards to Off Balance Sheet, NCBC has SAR 51.93 million of total off-balance sheet exposure (31st Dec. 2017: SAR 6.96 million). These are mainly future commitments arising from leasehold commitments, investments in NCBC's Funds and Information Technology related contracts. For more details, please refer to Appendix 5.

4.5 Market Risk

Market risk is the risk of losses in on-and off-balance sheet positions arising from movements in market rates or prices such as profits rates, foreign exchange rates, equity prices, credit spreads and/ or commodity prices resulting in a loss to earnings and capital.

4.5.1 Market Risk Management

The Firm monitors Market Risk through the establishment of risk limits. These risk limits are established using a variety of risk measurement tools, including sensitivity analysis, value-at-risk and stress test methodologies.

Moreover, policies and guidelines for managing market risk on NCBC's treasury investments are defined in the Firm's Asset Allocation Guidelines, Proprietary Investment Risk Guidelines, and Credit and Market Risk Policy. For client products, these guidelines are contained in separate risk policies.

4.5.2 Interest Rate Risk

The Firm has limited exposure to interest rate risk on its own treasury investments. On its margin trading business, the Firm's funding model is designed to ensure that margin pricing is above its cost of funding (measured based on opportunity cost mechanism). Moreover, Risk Management Department monitors the margin trading portfolio's net profit margin, and the alignment of margin pricing with the evolution of market interest rates.

4.5.3 Market Risk capital charge

In compliance with CMA guidelines, NCBC has used Standardized approach to determine capital requirement for the Market risk. The breakdown of the market risk capital charge across the different risk types is indicated in the table 7 below.

NCBC's Equity & Fund Risk exposure is mainly due to its investments held for trading (classified as Fair Value through Profit or Loss ("FVTPL"). NCBC has a very conservative approach and most of these investments are in NCBC's own Funds.

The Firm has limited exposure to Foreign Exchange (FX) risk as its FX exposure is mostly to USD and other GCC currencies pegged to the USD.

(All amounts in SAR '000)

Risk	Capital Required	
	31-Dec-18	31-Dec-17
Equity & Fund Risk	72,730	104,331
Interest Rate Risk	-	-
Commodities Risk	-	-
FX Risk	7,453	6,071
Underwriting Risk	-	-
Excess Exposure Risk	-	23,318
Settlement Risk	-	-
Total	**80,184**	**133,720**

Table 7 – Market Risk Capital Charge

4.6 Operational Risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events, this will include legal risks covering, but not limited to, exposure to fines, penalties, or punitive damages resulting from supervisory actions, as well as private settlements.

4.6.1 Operational Risk Management

The Firm considers breakdowns in internal controls and corporate governance as the most important aspect of Operational risk as such breakdowns can lead to financial losses through error, fraud, or failure to perform in a timely manner. The Firm recognizes that good management information systems (MIS) and a strong internal control culture and contingency planning are all crucial elements of effective operational risk management and takes measures to continually develop procedures and systems to support such requirements.

Operational risk profiles are updated periodically in order to ensure that internal controls are proactively realigned to mitigate emerging risks. Individual line managers are responsible for identifying and assessing the operational risks of their area; this process is supported by the Head of Risk.

The Firm follows a structured method to identify and mitigate Operational Risk and this includes identification, quantification, and monitoring.

For low-probability high-impact insurable operating risks, the Firm makes use of insurance policies to transfer risk and in this respect has insurance coverage under the following insurance policies:

- Professional Indemnity Insurance;
- Directors and Officers Liability Insurance;
- General Public Liability Insurance;
- Cybercrime Risk Liability Insurance;
- Bankers Blanket Bond Insurance; and

- Property All Risk Insurance

Business Continuity Management

The Firm has also developed a comprehensive Business Continuity Management (BCM) program to maintain and enhance the operational resilience within NCBC. Various plans and procedures like Business Continuity, Incident Management, Emergency response procedures, Business recovery plans and strategy are in place to deal with the continuity of critical Business processes for complete line of Business and support functions and form the BCM framework. In order to ensure adoption of the framework throughout the organization, NCBC has also established the BCM Steering Committee to develop, implement, and monitor the program.

4.6.2 Operational Risk capital charge

In compliance with CMA requirements, the Firm has adopted the Basic Indicator Approach (BIA) as this is a more conservative approach as it leads to a higher capital charge than the Expenditure Based Approach (EBA). The summary is in the below table.

(All Amounts in SAR '000, as of 31st Dec., 2018)

Approach 1	Year	Gross Income	Average Gross Income	Risk Capital Charge (%)	Capital Required
Basic Indicator Approach (BIA)	2016*	582,136	651,349	15%	97,702
	2017	648,317			
	2018	723,595			
Approach 2	**Year**	**Expenses**	**Risk Capital Charge (%)**		**Capital Required**
Expenditure Based Approach (EBA)	2018	351,744	25%		87,936
Maximum of (BIA or EBA)					**97,702**

(All Amounts in SAR '000, as of 31st Dec., 2017)

Approach 1	Year	Gross Income	Average Gross Income	Risk Capital Charge (%)	Capital Required
Basic Indicator Approach (BIA)	2015	679,562	636,672	15%	95,501
	2016*	582,136			
	2017	648,317			
Approach 2	**Year**	**Expenses**	**Risk Capital Charge (%)**		**Capital Required**
Expenditure Based Approach (EBA)	2017	356,675	25%		89,169
Maximum of (BIA or EBA)					**95,501**

* Amount of SR 8,940 has been reclassified to Gross income

Table 8 – Operational Risk Capital Charge

4.7 Liquidity Risk

Liquidity risk is the inability of an organization to honour payment commitments when they are due and replace funds when they are withdrawn in a timely and cost effective manner. This can be caused by market disruptions or credit downgrades. Effective liquidity risk management therefore helps to ensure the Firm's ability to meet its cash flow obligation and in maintaining diverse funding sources to the Firm. Often, liquidity risk arises due to mismatch in the maturity pattern of assets and liabilities.

4.7.1 Liquidity Risk Management

NCBC's Liquidity Management Strategy is characterized by the following elements:

- Preserving the liquidity and security of cash by investing excess liquidity in NCBC's own money market funds or, alternatively, only with approved counterparties using short-term deposits or Murabahas;
- For its liquidity and cash flows, the Firm relies on operating cash flows, capital resources and treasury investments as the key sources of funds on a going-concern basis. Should severe liquidity stress scenarios materialize, liquidation of treasury investments and reserves as well as intra-group facilities are available;
- The Head of Finance is responsible for the day-to-day liquidity management under the oversight of the Firm's Investment Committee. Risk Management and Internal Audit provide independent oversight and control.

The Firm has also identified potential stress scenarios and the contingency plan recognizes liquidity resources that could be accessed under stress conditions. The plan also provides action items that define different levels of liquidity stress. For each level, the plan evaluates funding capacities; specific actions and procedures to be implemented and identifies alternative contingency funding.

4.7.2 Liquidity Reserves

NCBC holds cash required for day-to-day operational cash requirements in a current deposit account as this can be accessed instantly. The Firm actively manages its daily funding obligations through a number of measures including availability of surplus cash and daily monitoring of Asset Management funding requirements.

4.7.3 Funding Sources

NCBC has no significant short-term liabilities and earning assets are funded by equity. The Firm does not currently use alternative instruments to fund its assets. The firm benefits from stand-by intra-group support for its investment banking, underwriting commitments as well as to support unusual redemptions on its public funds.

4.7.4 Risk Measures and Ratios

NCBC prepares a statement of expected cash flows arising at the time of settlement of its assets and liabilities and allocates them in different time intervals in which they are expected to occur. The time intervals are stated below:

- Up to 3 months;
- From 3 months to 12 months;
- From 1 year to 5 years;
- Over 5 years; and
- Non-Maturing.

An analysis of the residual maturity profile of NCBC's assets has been conducted segregating them in different maturity buckets. The below table illustrates the results.

(All amounts in SAR '000 as of 31st Dec. 2018)

Particulars	Up to 3 months	> 3 to 12 months	> 1 to 5 years	> 5 years	Non Maturity	Total
Inflows / Assets						
Current Assets						**1,123,848**
Cash in hand	-	-	-	-	85	85
Deposits with other banks	126,386	-	-	-	-	126,386
HFT Investments	554,895	-	-	-	-	554,895
Murabaha Financing	53,799	197,083	-	-	-	250,882
Prepayments and other assets	191,600	-	-	-	-	191,600
Non-Current Assets						**356,319**
Investments	-	-	138,420	-	-	138,420
Investment in an associate	-	-	-	-	29,605	29,605
Property and equipment	-	-	-	-	188,294	188,294
Prepayments and other assets	-	-	-	-	-	-
Total Assets	**829,679**	**197,083**	**138,420**	**-**	**217,984**	**1,480,167**
Off-balance sheet Items					**51,949**	

(All amounts in SAR '000 as of 31st Dec. 2017)

Particulars	Up to 3 months	> 3 to 12 months	> 1 to 5 years	> 5 years	Non Maturity	Total
Inflows / Assets						
Current Assets						**999,061**
Cash in hand	-	-	-	-	70	70
Deposits with other banks	149,960	-	-	-	-	149,960
HFT Investments	652,067	-	-	-	-	652,067
Murabaha Financing	6,425	72,152	-	-	-	78,577
Prepayments and other assets	118,387	-	-	-	-	118,387
Non-Current Assets						**302,299**
Investments	-	-	84,872	-	-	84,872
Investment in an associate	-	-	-	-	31,825	31,825
Property and equipment	-	-	-	-	170,383	170,383
Prepayments and other assets	-	-	15,219	-	-	15,219
Total Assets	**926,839**	**72,152**	**100,091**	**-**	**202,278**	**1,301,360**
Off-balance sheet Items					**6,965**	

Table 9 – Residual Maturity Analysis

The net cash flows across all time intervals are accumulated to observe the quantum of cumulative net cash flow in each bucket. NCBC's, cumulative gap is positive through all the maturity buckets signifying that the Firm has adequate liquidity to meet its funding obligations.

Apart from cash flow gap analysis, following ratio is being monitored to maintain appropriate liquidity levels.

Indicator	Dec-18	Dec-17	Inference
Current Ratio = Short term Assets / Short Term Liabilities	4.02	4.33	This reflects the high level of cushion/comfort level in meeting its short-term liabilities and fixed cost payments.

Table 10 – Ratio Analysis

4.8 Enterprise Risk Management ("ERM")

In recognition to the importance of ERM, NCBC has established an ERM function within Risk Management Division. The main responsibility of the function is to develop and implement an ERM framework (including policies, processes and systems) that is compliant with the CMA regulation and aligned with international best practices (e.g. COSO ERM Framework).

The department's other key responsibilities include: Corporate Risk profile assessment (including strategic and emerging risks), review and monitoring of the Company's Risk Appetite, preparation of the ICAAP report (including: assessment of Pillar 2 risks and stress testing of NCBC's business plan and budget) and the Pillar 3 disclosure report, regular risk reporting to the Senior Management and the BRC.

5 Appendices

5.1 Appendix 1 - Disclosure on Capital Base

Capital Base	2018	2017
	SAR '000	
Tier-1 capital		
Paid-up capital	1,000,000	1,000,000
Audited retained earnings	169,790	63,838
Share premium	-	-
Reserves (other than revaluation reserves)	167,248	134,248
Tier-1 capital contribution	-	-
Deductions from Tier-1 capital	(300,279)	(280,580)
Total Tier-1 capital	**1,036,759**	**917,506**
Tier-2 capital		
Subordinated loans	-	-
Cumulative preference shares	-	-
Revaluation reserves	-	-
Other deductions from Tier-2 (-)	-	-
Deduction to meet Tier-2 capital limit (-)	-	-
Total Tier-2 capital	**-**	**-**
Total Capital Base	**1,036,759**	**917,506**

5.2 Appendix 2 - Disclosure on Capital Adequacy

(All Amounts in SAR '000, as of 31st Dec. 2018)

<table>
<tr><th>Exposure Class</th><th colspan="2">Exposures before CRM</th><th>Net Exposures after CRM</th><th>Risk Weighted Assets</th><th>Capital Requirement</th></tr>
<tr><td><u>Credit Risk</u></td><td colspan="2"></td><td></td><td></td><td></td></tr>
<tr><td>On-balance Sheet Exposures</td><td colspan="2"></td><td></td><td></td><td></td></tr>
<tr><td>Governments and Central Banks</td><td colspan="2">3,836</td><td>3,836</td><td>767</td><td>107</td></tr>
<tr><td>Authorized Persons and Banks (including cash)</td><td colspan="2">145,294</td><td>145,294</td><td>29,059</td><td>4,068</td></tr>
<tr><td>Corporates</td><td colspan="2">32,121</td><td>32,121</td><td>149,020</td><td>20,863</td></tr>
<tr><td>Retail</td><td colspan="2">-</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Investments</td><td colspan="2">290,428</td><td>290,428</td><td>986,328</td><td>138,086</td></tr>
<tr><td>Securitization</td><td colspan="2">-</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Margin Financing</td><td colspan="2">250,882</td><td>250,882</td><td>376,323</td><td>52,685</td></tr>
<tr><td>Other Assets</td><td colspan="2">200,724</td><td>200,724</td><td>607,690</td><td>85,077</td></tr>
<tr><td>Total On-Balance sheet Exposures</td><td colspan="2">923,285</td><td>923,285</td><td>2,149,187</td><td>300,886</td></tr>
<tr><td>Off-balance Sheet Exposures</td><td colspan="2"></td><td></td><td></td><td></td></tr>
<tr><td>OTC/Credit Derivatives</td><td colspan="2">-</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Repurchase agreements</td><td colspan="2">-</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Securities borrowing/lending</td><td colspan="2">-</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Commitments</td><td colspan="2">51,928</td><td>51,928</td><td>370,916</td><td>51,928</td></tr>
<tr><td>Other off-balance sheet exposures</td><td colspan="2">-</td><td>-</td><td>-</td><td>-</td></tr>
<tr><td>Total Off-Balance sheet Exposures</td><td colspan="2">51,928</td><td>51,928</td><td>370,916</td><td>51,928</td></tr>
<tr><td>Total On and Off-Balance sheet Exposures</td><td colspan="2">975,213</td><td>975,213</td><td>2,520,103</td><td>352,814</td></tr>
<tr><td>Prohibited Exposure Risk Requirement*</td><td colspan="2"></td><td></td><td>-</td><td>-</td></tr>
<tr><td>Total Credit Risk Exposures</td><td colspan="2"></td><td></td><td>2,520,103</td><td>352,814</td></tr>
<tr><td><u>Market Risk</u></td><td>Long Position</td><td>Short Position</td><td></td><td></td><td></td></tr>
<tr><td>Interest rate risks</td><td>-</td><td>-</td><td></td><td></td><td>-</td></tr>
<tr><td>Equity price risks</td><td>-</td><td>-</td><td></td><td></td><td>-</td></tr>
<tr><td>Risks related to investment funds</td><td>454,564</td><td>-</td><td></td><td></td><td>72,730</td></tr>
<tr><td>Securitization/ re-securitization positions</td><td>-</td><td>-</td><td></td><td></td><td>-</td></tr>
<tr><td>Excess exposure risks</td><td>-</td><td>-</td><td></td><td></td><td>-</td></tr>
<tr><td>Settlement risks and counterparty risks</td><td>-</td><td>-</td><td></td><td></td><td>-</td></tr>
<tr><td>Foreign exchange rate risks</td><td>260,837</td><td>(15,880)</td><td></td><td></td><td>7,453</td></tr>
<tr><td>Commodities risks.</td><td>-</td><td>-</td><td></td><td></td><td>-</td></tr>
<tr><td>Total Market Risk Exposures</td><td>715,401</td><td>(15,880)</td><td></td><td></td><td>80,184</td></tr>
<tr><td><u>Operational Risk</u></td><td></td><td></td><td></td><td></td><td>97,702</td></tr>
<tr><td><u>Minimum Capital Requirement</u></td><td></td><td></td><td></td><td></td><td>530,700</td></tr>
<tr><td><u>Surplus/ (Deficit) in Capital</u></td><td></td><td></td><td></td><td></td><td>506,058</td></tr>
<tr><td><u>Total Capital Ratio (time)</u></td><td></td><td></td><td></td><td></td><td>1.95x</td></tr>
</table>

5.2 Appendix 2 - Disclosure on Capital Adequacy (Continued)

(All Amounts in SAR '000, as of 31st Dec. 2017)

Exposure Class	Exposures before CRM		Net Exposures after CRM	Risk Weighted Assets	Capital Requirement
Credit Risk					
On-balance Sheet Exposures					
Governments and Central Banks	3,774		3,774	755	106
Authorized Persons and Banks (including cash)	149,960		149,960	29,992	4,199
Corporates	30,087		30,087	214,821	30,075
Retail	-		-	-	-
Investments	172,575		172,575	608,830	85,236
Securitization	-		-	-	-
Margin Financing	78,577		78,577	117,866	16,501
Other Assets	135,923		135,923	407,770	57,088
Total On-Balance sheet Exposures	**570,896**		**570,896**	**1,380,034**	**193,205**
Off-balance Sheet Exposures					
OTC/Credit Derivatives	-		-	-	-
Repurchase agreements	-		-	-	-
Securities borrowing/lending	-		-	-	-
Commitments	6,965		6,965	49,729	6,962
Other off-balance sheet exposures	-		-	-	-
Total Off-Balance sheet Exposures	**6,965**		**6,965**	**49,729**	**6,962**
Total On and Off-Balance sheet Exposures	**577,861**		**577,861**	**1,429,763**	**200,167**
Prohibited Exposure Risk Requirement*				-	-
Total Credit Risk Exposures				**1,429,763**	**200,167**
Market Risk	**Long Position**	**Short Position**			
Interest rate risks	-	-			-
Equity price risks	-	-			-
Risks related to investment funds	652,067	-			104,331
Securitization/ re-securitization positions	-	-			-
Excess exposure risks	302,247	-			23,318
Settlement risks and counterparty risks	-	-			-
Foreign exchange rate risks	186,907	5,922			6,071
Commodities risks.	-	-			-
Total Market Risk Exposures	**1,141,221**	**5,922**			**133,720**
Operational Risk					**95,501**
Minimum Capital Requirement					**429,388**
Surplus/ (Deficit) in Capital					**488,118**
Total Capital Ratio (time)					**2.14x**

** Any exposure amount in excess of the exposure limit of 25% of the capital base is termed "prohibited exposure" per CMA prudential guidelines.*

5.3 Appendix 3 - Disclosure on Credit Risk's Risk Weight

(All Amounts in SAR '000, as of 31st Dec. 2018)

Risk Weights	Exposures after netting and credit risk mitigation												
	Governments and central banks	Administrative bodies and NPO	Authorised persons and banks	Margin Financing	Corporates	Retail	Past due items	Investments	Securitization	Other assets	Off-balance sheet commitments	Total Exposure after netting and Credit Risk Mitigation	Total Risk Weighted Assets
0%	-	-	-	-	-	-	-	-	-	85	-	85	-
20%	3,836	-	145,294	-	-	-	-	-	-	-	-	149,130	29,826
50%	-	-	-	-	12,097	-	-	-	-	-	-	12,097	6,049
100%	-	-	-	-	-	-	-	-	-	-	-	-	-
150%	-	-	-	250,882	-	-	-	-	-	-	-	250,882	376,323
200%	-	-	-	-	-	-	-	-	-	-	-	-	-
300%	-	-	-	-	-	-	-	175,385	-	199,391	-	374,776	1,124,328
400%	-	-	-	-	-	-	-	115,043	-	-	-	115,043	460,172
500%	-	-	-	-	-	-	-	-	-	-	-	-	-
714%	-	-	-	-	20,024	-	-	-	-	1,333	51,928	73,285	523,405
Average Risk Weight	20%	0%	20%	150%	464%	0%	0%	340%	0%	303%	714%	261%	
Deduction from Capital Base	107	-	4,068	52,685	20,863	-	-	138,086	-	85,077	51,928	-	352,814

** Any exposure amount in excess of the exposure limit of 25% of the capital base is termed "prohibited exposure" per CMA prudential guidelines*

5.3 Appendix 3 - Disclosure on Credit Risk's Risk Weight (Continued)

(All Amounts in SAR '000, as of 31st Dec. 2017)

Risk Weights	Exposures after netting and credit risk mitigation												
	Governments and central banks	Administrative bodies and NPO	Authorised persons and banks	Margin Financing	Corporates	Retail	Past due items	Investments	Securitization	Other assets	Off-balance sheet commitments	Total Exposure after netting and Credit Risk Mitigation	Total Risk Weighted Assets
0%	-	-	-	-	-	-	-	-	-	70	-	70	-
20%	3,774	-	149,960	-	-	-	-	-	-	-	-	153,734	30,747
50%	-	-	-	-	-	-	-	-	-	-	-	-	-
100%	-	-	-	-	-	-	-	-	-	-	-	-	-
150%	-	-	-	78,577	-	-	-	12,218	-	-	-	90,795	136,192
200%	-	-	-	-	-	-	-	-	-	-	-	-	-
300%	-	-	-	-	-	-	-	50,926	-	135,923	-	186,849	560,547
400%	-	-	-	-	-	-	-	109,431	-	-	-	109,431	437,724
500%	-	-	-	-	-	-	-	-	-	-	-	-	-
714%	-	-	-	-	30,086	-	-	-	-	-	6,965	37,051	264,550
Average Risk Weight	20%	0%	20%	150%	714%	0%	0%	353%	0%	300%	714%	247%	
Deduction from Capital Base	106	-	4,199	16,501	30,075	-	-	85,236	-	57,088	6,962	-	200,167

** Any exposure amount in excess of the exposure limit of 25% of the capital base is termed "prohibited exposure" per CMA prudential guidelines*

5.4 Appendix 4 - Disclosure on Credit Risk's Rated Exposure

(All Amounts in SAR '000, as of 31st Dec. 2018)

Exposure Class (All amounts in SAR'000)	Long term Ratings of counterparties							
	Credit quality step	1	2	3	4	5	6	Unrated
	S&P	AAA TO AA-	A+ TO A-	BBB+ TO BBB-	BB+ TO BB-	B+ TO B-	CCC+ and below	Unrated
	Fitch	AAA TO AA-	A+ TO A-	BBB+ TO BBB-	BB+ TO BB-	B+ TO B-	CCC+ and below	Unrated
	Moody's	Aaa TO Aa3	A1 TO A3	Baa1 TO Baa3	Ba1 TO Ba3	B1 TO B3	Caa1 and below	Unrated
	Capital Intelligence	AAA	AA TO A	BBB	BB	B	C and below	Unrated
On and Off-balance-sheet Exposures								
Governments and Central Banks	-	-	3,836	-	-	-	-	-
Authorised Persons and Banks (including cash)	-	18,908	43,155	83,231	-	-	-	-
Corporates	-	-	12,097	-	-	-	-	20,024
Retail	-	-	-	-	-	-	-	-
Investments	-	-	-	-	-	-	-	290,428
Securitisation	-	-	-	-	-	-	-	-
Margin Financing	-	-	-	-	-	-	-	250,882
Other Assets (excluding Cash)	-	-	-	-	-	-	-	200,724
Off-balance sheet commitments	-	-	-	-	-	-	-	51,928
Total	**-**	**18,908**	**59,088**	**83,231**	**-**	**-**	**-**	**813,986**

5.4 Appendix 4 - Disclosure on Credit Risk's Rated Exposure (Continued)

(All Amounts in SAR '000, as of 31st Dec. 2017)

Exposure Class (All amounts in SAR'000)	Long term Ratings of counterparties							
	Credit quality step	1	2	3	4	5	6	Unrated
	S&P	AAA TO AA-	A+ TO A-	BBB+ TO BBB-	BB+ TO BB-	B+ TO B-	CCC+ and below	Unrated
	Fitch	AAA TO AA-	A+ TO A-	BBB+ TO BBB-	BB+ TO BB-	B+ TO B-	CCC+ and below	Unrated
	Moody's	Aaa TO Aa3	A1 TO A3	Baa1 TO Baa3	Ba1 TO Ba3	B1 TO B3	Caa1 and below	Unrated
	Capital Intelligence	AAA	AA TO A	BBB	BB	B	C and below	Unrated
On and Off-balance-sheet Exposures								
Governments and Central Banks		-	3,776	-	-	-	-	-
Authorised Persons and Banks (including cash)		-	2,144	147,816	-	-	-	70
Corporates		-	-	-	-	-	-	30,087
Retail		-	-	-	-	-	-	-
Investments		-	-	-	-	-	-	172,575
Securitisation		-	-	-	-	-	-	-
Margin Financing		-	-	-	-	-	-	78,577
Other Assets (excluding Cash)		-	-	-	-	-	-	135,923
Off-balance sheet commitments		-	-	-	-	-	-	6,965
Total		**-**	**5,920**	**147,816**	**-**	**-**	**-**	**424,196**

5.5 Appendix 5 - Disclosure on Credit Risk Mitigation (CRM)

(All Amounts in SAR '000, as of 31st Dec. 2018)

Exposure Class (All amounts in SAR'000)	Exposures before CRM	Exposures covered by Guarantees/ Credit derivatives	Exposures covered by Financial Collateral	Exposures covered by Netting Agreement	Exposures covered by other eligible collaterals	Exposures after CRM
Credit Risk						
On-balance Sheet Exposures						
Governments and Central Banks	3,836	-	-	-	-	3,836
Authorized Persons and Banks	145,294	-	-	-	-	145,294
Corporates	32,121	-	-	-	-	32,121
Retail	-	-	-	-	-	-
Investments	290,428	-	-	-	-	290,428
Securitization	-	-	-	-	-	-
Margin Financing	250,882	-	-	-	250,882	250,882
Other Assets	200,724	-	-	-	-	200,724
Total On-Balance sheet Exposures	**923,285**	**-**	**-**	**-**	**250,882**	**923,285**
Off-balance Sheet Exposures						
OTC/Credit Derivatives	-	-	-	-	-	-
Exposure in the form of repurchase agreements	-	-	-	-	-	-
Exposure in the form of securities lending	-	-	-	-	-	-
Exposure in the form of commitments	51,928	-	-	-	-	51,928
Other Off-Balance sheet Exposures	-	-	-	-	-	-
Total Off-Balance sheet Exposures	**51,928**	**-**	**-**	**-**	**-**	**51,928**
Total On and Off-Balance sheet Exposures	**975,213**	**-**	**-**	**-**	**250,882**	**975,213**

5.6 Appendix 5 - Disclosure on Credit Risk Mitigation (CRM) (Continued)

(All Amounts in SAR '000, as of 31st Dec. 2017)

Exposure Class (All amounts in SAR'000)	Exposures before CRM	Exposures covered by Guarantees/ Credit derivatives	Exposures covered by Financial Collateral	Exposures covered by Netting Agreement	Exposures covered by other eligible collaterals	Exposures after CRM
Credit Risk						
On-balance Sheet Exposures						
Governments and Central Banks	3,774	-	-	-	-	3,774
Authorized Persons and Banks	149,960	-	-	-	-	149,960
Corporates	30,086	-	-	-	-	30,086
Retail	-	-	-	-	-	-
Investments	172,575	-	-	-	-	172,575
Securitization	-	-	-	-	-	-
Margin Financing	78,577	-	-	-	78,577	78,577
Other Assets	135,923	-	-	-	-	135,923
Total On-Balance sheet Exposures	**570,895**	**-**	**-**	**-**	**78,577**	**570,895**
Off-balance Sheet Exposures						**0**
OTC/Credit Derivatives	-	-	-	-	-	-
Exposure in the form of repurchase agreements	-	-	-	-	-	-
Exposure in the form of securities lending	-	-	-	-	-	-
Exposure in the form of commitments	-	-	-	-	-	-
Other Off-Balance sheet Exposures	6,965	-	-	-	-	6,965
Total Off-Balance sheet Exposures	**6,965**	**-**	**-**	**-**	**-**	**6,965**
Total On and Off-Balance sheet Exposures	**577,860**	**-**	**-**	**-**	**78,577**	**577,860**