

Eskan Bank B.S.C. (c)
Basel III, Pillar III Disclosures
30 June 2017

Eskan Bank B.S.C. (c)

Basel III, Pillar III Disclosures

As at 30 June 2017

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Table 1: CAPITAL STRUCTURE

The following table summarizes the eligible capital after deductions for Capital Adequacy Ratio (CAR) calculation as of 30 June 2017.

	<u>CET1</u>	<u>AT1</u>	<u>T2</u>
Components of capital			
Tier 1 Capital			
Common Equity Tier 1 (CET1)			
Issued and fully paid ordinary shares	108,300	-	-
General reserves	23,946	-	-
Statutory reserves	54,462	-	-
Retained earnings	47,428	-	-
Current interim profits	8,788	-	-
Total CET 1 Capital prior to the regulatory adjustments	242,924	-	-
Less: Regulatory adjustments			
Intangibles other than mortgage servicing rights	324		
Total CET 1 Capital after the regulatory adjustments	242,600	-	-
Other Capital (AT1 & T2)			
General loan loss provisions	-	-	120
Net available Capital	242,600	-	120
Total Capital			242,720

The CBB Capital Adequacy Rules provides guidance on the risk measurements for the calculation of capital requirements. Conventional bank licenses are required to meet the following minimum CAR requirements:

Components of consolidated CARs				
	Optional	Minimum Ratio Required	Capital conservation buffer (CCB)	CAR including CCB
Common Equity Tier 1 (CET1)		6.5%	2.5 % comprising of CET1	9.0%
Additional Tier 1 (AT1)	1.5%			10.5%
Tier 1 (T1)		8.0%		
Tier 2 (T2)	2%			
Total Capital		10.0%		12.5%

Following are Capital Adequacy Ratios for total capital and Tier 1 capital as of 30 June 2017 :

CET1 Capital Adequacy Ratio	130%
T1 Capital Adequacy Ratio	130%
Total Capital Adequacy Ratio	130%

Following are the total risk weighted exposures for each category of risk the Bank is exposed to as of 30 June 2017 :

Credit Risk Weighted Exposures- Standardized Approach	151,437
Operational Risk Weighted Exposures- Basic indicator approach	35,245
Market Risk Weighted Exposures- Standardized Approach	-
Total Risk Weighted Exposures	186,682

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Table 2: ASSETS - FUNDED, UNFUNDED AND AVERAGE EXPOSURES (PD 1.3.23 (a))

The following table summarises the amount of gross funded and unfunded credit exposure and average gross funded and unfunded exposures as of 30 June 2017 :

	<i>Gross Exposures</i>	<i>* Average Exposures</i>
<u>Funded Exposure</u>		
Cash and bank balances	56,751	66,830
Investments	4,757	4,757
Loans	475,707	477,254
Investment in associates	5,906	5,729
Investment properties	54,482	54,498
Development properties	15,086	15,337
Other assets	3,715	3,644
	616,404	628,049
<u>Unfunded Exposure</u>		
Loan related	7,758	8,284
Lease commitments	627	391
Capital Commitments	1,291	1,349
	9,676	10,024

* Average balances are computed based on quarter end balances.

The Group holds collateral against commercial loans in the form of mortgage on residential property. However, for the purposes of capital adequacy computation, only eligible collateral is taken into consideration for credit risk mitigation. Thus, the Bank does not consider its collateral for calculation of its credit risk weight exposures.

Table 3: CAPITAL REQUIRMENTS - CREDIT RISK EXPOSURE STANDARD PORTFOLIO (PD 1.3.15)

The following table summarises the capital requirements for credit risk by type of standard portfolios that are subject to standardised approach as of 30 June 2017:

	<i>* Gross Exposures</i>	<i>Risk Weighted Value</i>	<i>** Capital Charge</i>
<u>Standard Portfolio</u>			
Cash items	120	-	-
Claims on sovereign	509,497	-	-
Claims on Bnaks	9,782	1,956	245
Claims on corporate	12,799	6,400	800
Claims on investment firms	658	329	41
Mortgage	10,969	8,227	1,028
Past due exposure	1,050	1,050	131
Equity investments	1,519	2,279	285
All other holdings of real estate	64,460	128,920	16,115
Other assets	2,276	2,276	285
	613,130	151,437	18,930

*Gross Exposures are in agreement with the Form PIRI submitted to the Central Bank of Bahrain ("CBB") which takes in to account deduction made in order to arrive at the eligible capital.

** Capital charge is calculated at 12.5%.

On and off- Balance Sheet netting:

The Group did not make use of on and off balance sheet netting arrangements as of 30 June 2017.

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Table 4: GEORAPHICAL DISTRIBUTION OF EXPOSURE (PD 1.3.23 (b))

The following table summarises the geographic distribution of credit exposures, broken down into significant areas by major types of credit exposure as of 30 June 2017 :

	<i>Kingdom of Bahrain</i>	<i>Total</i>
Funded Exposures		
Cash and bank balances	56,751	56,751
Investments	4,757	4,757
Loans	475,707	475,707
Investment in associates	5,906	5,906
Investment properties	54,482	54,482
Development properties	15,086	15,086
Other assets	3,715	3,715
	616,404	616,404
Unfunded Exposures		
Loan related	7,758	7,758
Lease commitments	627	627
Capital Commitment	1,291	1,291
	9,676	9,676

The Group considers the above geographical disclosure to be the most appropriate as the Group's activities are conducted in the Kingdom of Bahrain.

Table 5: INDUSTRY ANALYSIS (PD 1.3.23 (c))

The following table summarises the distribution of funded and unfunded credit exposure by industry type as of 30 June 2017:

	<i>Banks and financial institutions</i>	<i>Real estate and construction</i>	<i>Residential mortgage</i>	<i>Tourism</i>	<i>Other</i>	<i>Total</i>
Funded Exposures						
Cash and bank balances	56,751	-	-	-	-	56,751
Investments	-	3,273	-	1,216	268	4,757
Loans	-	-	475,707	-	-	475,707
Investment in associates	-	5,906	-	-	-	5,906
Investment properties	-	54,482	-	-	-	54,482
Development properties	-	15,086	-	-	-	15,086
Other assets	-	250	-	-	3,465	3,715
	56,751	78,997	475,707	1,216	3,733	616,404
Unfunded Exposures						
Loan related	-	-	7,758	-	-	7,758
Lease commitments	-	-	-	-	627	627
Capital Commitment	-	1,291	-	-	-	1,291
	-	1,291	7,758	-	627	9,676

The above includes certain exposures to individual counterparties, which are in excess of 15 percent of the Bank's capital base and are exempt exposures under the CM module of the Rule book issued by the Central Bank of Bahrain.

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Table 6: INTRA-GROUP TRANSACTIONS (PD 1.3.23 (d))

The Bank disclosed its intra-group transactions with its subsidiaries on stand alone basis. The following table summarises intra-group transactions as of 30 June 2017 :

	<i>Eskan Bank</i>	<i>RMBS Co</i>	<i>Eskan Property Co.</i>	<i>Dannat Al Luzi</i>	<i>Total</i>
Assets					
Balances with Banks	-	-	157	-	157
Inter Bank Deposits	-	8,053	712	-	8,764
Investments in subsidiaries	8,652	-	-	-	8,652
Other Assets	2,985	12,173	461	20.82	15,641
	11,637	20,226	1,329	21	33,213
Liabilities and Equity					
Non-Bank Deposits	8,764	-	-	-	8,764
Current Accounts	157	-	-	-	157
Other Liabilities	12,619	2,272	643	15	15,550
Share Capital & Reserves	(32)	1	333	8,440	8,742
	21,508	2,273	977	8,455	33,213

Table 7: RELATED PARTY TRANSACTIONS

The following table summarises related party exposure as of 30 June 2017 :

Short term employee benefits	377
Long term employee benefits	20
Total	396

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Table 8: PAST DUE LOANS - AGING ANALYSIS (PD 1.3.23 (h) & (i))

The Group's entire past due and provision balances as at 30 June 2017 relates to its operations in the Kingdom of Bahrain. The following table summarises the total past due loans and provisions disclosed by industry as of 30 June 2017 :

	<i>3 months up to 1 year</i>	<i>1 up to 3 years</i>	<i>Over 3 years</i>	<i>Total</i>
Retail mortgage social loans *	14,949	10,677	5,868	31,494
Retail mortgage commercial loans	771	958	757	2,486
	15,719	11,635	6,626	33,980

Table 9: MOVEMENT IN PROVISIONS (PD 1.3.23 (h) & (i))

	<i>Opening balance</i>	<i>Charge for the year</i>	<i>Write off/ write back</i>	<i>Closing balance</i>
General Provision				
Retail mortgage commercial loans **	142	-	(23)	120
Specific Provision				
Retail mortgage commercial loans	1,304	244	(86)	1,461
	1,446	244	(109)	1,581

* The credit Risk of Social Loans does not reside with the Group as it is guaranteed by the Government and hence no impairment provisions are being made.

** The Group has implemented Credit Risk Policy for retail mortgage commercial loan portfolio under which the Group provides 1% of the overall retail mortgage commercial loan as a nominal collective provision.

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Table 10: OPERATIONAL RISK (PD 1.3.18), (PD 1.3.32) and (PD 1.3.33)

The following table summarises the amount of exposures subject to basic indicator approach of operational risk and related capital requirements as of 30 June 2017 :

			BHD 000's
Year	2014	2015	2016
Gross income	16,570	18,310	21,512
Average Gross income			18,797
Multiplier			12.5
			234,967
Eligible portion for purpose of the calculation			15%
Total operation risk weighted exposures			35,245
Minimum capital requirement (12.5%)			4,406

Table 11: RESTRUCTURED FACILITY (PD 1.3.23 (j))

The following table summarises the total loans that have been restructured during the period ended 30 June 2017 :

Social loans	0.2
Commercial loans	-

There is no significant impact of the restructured commercial mortgage loans on the provisions as well as present and future earnings. In addition, the magnitude of the restructuring activities related to the commercial mortgage loans is immaterial.

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Table 12: RESIDUAL CONTRACTUAL MATURITY BREAKDOWN (PD 1.3.23 (g))

The following table summarises the residual contractual maturity breakdown of the whole credit portfolio as of 30 June 2017, broken down by major types of credit exposure.

For items that do not have a contractual maturity, expected maturity has been used for the purpose of this disclosure:

	1-7 Days	7 Days - 1 Month	1-3 Months	3-6 Months	6-12 Months	1-3 Years	3-5 Years	5-10 Years	10-20 Years	Above 20 Years	Total
Cash and bank balances	20,284	17,721	17,264	1,482	-	-	-	-	-	-	56,751
Investments	-	-	-	-	-	268	4,489	-	-	-	4,757
Loans	2,647	38	3,605	5,471	12,879	43,711	49,391	118,838	168,317	70,809	475,707
Investment in associates	-	-	-	-	777	-	5,129	-	-	-	5,906
Investment property	-	-	-	-	-	-	-	-	54,482	-	54,482
Development property	-	-	1,005	-	-	14,081	-	-	-	-	15,086
Other assets	475	35	1,178	174	31	1,023	798	-	-	-	3,715
TOTAL ASSETS	23,406	17,795	23,052	7,127	13,687	59,085	59,806	118,838	222,799	70,809	616,405
Deposits from financial and other institutions	7,500	12,500	-	-	-	-	-	-	-	-	20,000
Government accounts	-	-	-	-	-	-	-	-	-	269,182	269,182
Term loans	-	-	-	29,000	20,000	-	-	-	-	-	49,000
Other liabilities	4,298	527	1,462	1,057	2,033	7,499	4,800	3,600	3,333	-	28,608
TOTAL LIABILITIES	11,798	13,027	1,462	30,057	22,033	7,499	4,800	3,600	3,333	269,182	366,790
MISMATCH	11,609	4,768	21,590	(22,930)	(8,346)	51,586	55,006	115,238	219,467	(198,373)	249,615
CUMULATIVE MISMATCH	11,609	16,377	37,967	15,037	6,691	58,277	113,283	228,521	447,988	249,615	249,615

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Table 13: EQUITY POSITION RISK IN THE BANKING BOOKS

The following table summarises the total gross exposure of equity based investments as of 30 June 2017:

	Gross Exposures	Privately Held	Capital Charge
Available for sale investments	4,757	4,757	1,097
Investments in associates	5,906	5,906	1,477

The risk weighted assets used in arriving at the capital requirements considered certain investments risk weighted at 200% being equity investments in real estate entities. Further, there are no regulatory deductions to arrive at the eligible capital.

Capital Charge is calculated @ 12.5%.

Table 14: SENSITIVITY ANALYSIS - INTEREST RATE RISK (PD 1.3.35)

Analysis of the Group's sensitivity to an increase or decrease in a 200 bps parallel market interest rates (assuming no asymmetrical movement in yield curves and a constant balance sheet position) on the Group's net profit and equity:

LIABILITIES	1-7 Days	7 Days - 1 Month	1-3 Months	3-6 Months	6-12 Months	Total
Deposits from financial and other institutions	7,500	12,500	-	-	-	20,000
Term Loans	-	-	-	9,000	-	9,000
Rate sensitive Liabilities	7,500	12,500	-	9,000	-	29,000
ASSETS						
Balances and placements with financial institutions	20,165	17,721	17,264	1,482	-	56,632
Loans - commercial loans	184	38	115	184	375	896
Rate sensitive Assets	20,349	17,759	17,378	1,666	375	57,527
Mismatch	12,849	5,259	17,378	(7,334)	375	28,527
	4	19	60	135	270	
Change in Basis Points (+/- 200)	3	5	57	(54)	6	17

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Table 15: Reconciliation of published financial balance sheet to regulatory reporting As at 30 June 2017

Particulars	FS	PIR	Ref
ASSETS			
Cash and balances at central banks	42,606	42,607	
Placements with banks and similar financial institutions	14,145	9,782	
Financial assets at fair value through profit and loss	-	-	
Loans and advances to banks and non-banks	475,587	475,827	
of which general provisions	120	-	a
Held-to-maturity and available-for-sale investments	4,757	4,757	
Investment properties	54,482	54,482	
Interest in unconsolidated subsidiaries and associated companies	5,906	14,300	
Interest receivable	464	455	
Property, plant, and equipment (PPE)	882	342	
Other Assets	17,456	7,278	
of which: intangible assets deducted from regulatory capital	-	324	b
Total Assets (3.1 to 3.10 inclusive)	616,405	609,831	
NON-CAPITAL LIABILITIES			
Deposits from banks	20,000	20,005	
Deposits from non-banks	4,219	4,214	
Certificates of deposits issued	-	-	
Debt securities in issue	-	-	
Financial liabilities at fair value through profit and loss	-	-	
Term borrowings	49,000	49,000	
Securities sold under repos	-	-	
Dividend payable	-	-	
Interest payable	199	199	
Other liabilities	293,372	293,369	
Total non-capital items (2.1 to 2.10 inclusive)	366,790	366,787	
CAPITAL LIABILITIES			
Paid up share capital (net of treasury shares)	108,300	108,300	c
Share premium	-	-	
Legal reserve	54,462	54,462	d
General (disclosed) reserves	23,946	23,946	e
Retained earnings/(losses) brought forward	47,450	47,428	f
Net (loss) for the current period	-	-	
Net profit for the current period	8,792	8,788	g
Innovative capital instruments	-	-	
Minority interest in subsidiaries' share capital	6,666	-	
Fx translation adjustment	-	-	
Fixed assets revaluation reserves	-	-	
Collective impairment provision	-	120	a
Hybrid (debt/equity) capital instruments	-	-	
Subordinated debts	-	-	
Fair value changes on available-for-sale investments	-	-	
Fair value changes of cash flow hedges	-	-	
Short-term subordinated debts	-	-	
Total capital items (1.1 to 1.17 inclusive)	249,615	243,044	
Total capital and non-capital items (1.18 + 2.11)	616,405	609,831	

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Table 16: Composition of Capital Common Template (transition) as at 30 June 2017.

		Component of regulatory capital reported by bank	Amounts subject to pre 2015 treatment	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation from step 2
Common Equity Tier 1 capital: instruments and reserves				
1	Directly issued qualifying common share capital (and equivalent for non-joint stock companies) plus related stock surplus	108,300		c
2	Retained earnings	47,428		f
3	Accumulated other comprehensive income (and other reserves)	87,196		d+e+g
4	Not Applicable			
5	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)			
6	Common Equity Tier 1 capital before regulatory adjustments	242,924		
Common Equity Tier 1 capital: regulatory adjustments				
7	Prudential valuation adjustments			
8	Goodwill (net of related tax liability)			
9	Other intangibles other than mortgage-servicing rights (net of related tax liability)	-	540	b
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)			
11	Cash-flow hedge reserve			
12	Shortfall of provisions to expected losses			
13	Securitisation gain on sale (as set out in paragraph 562 of Basel II framework)			
14	Not applicable.			
15	Defined-benefit pension fund net assets			
16	Investments in own shares (if not already netted off paid-in capital on reported balance sheet)			
17	Reciprocal cross-holdings in common equity			
18	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued share capital (amount above 10% threshold)			
19	Significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions (amount above 10% threshold)			
20	Mortgage servicing rights (amount above 10% threshold)			
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability)			
22	Amount exceeding the 15% threshold			
23	of which: significant investments in the common stock of financials			
24	of which: mortgage servicing rights			
25	of which: deferred tax assets arising from temporary differences			
26	National specific regulatory adjustments			
	REGULATORY ADJUSTMENTS APPLIED TO COMMON EQUITY TIER 1 IN RESPECT OF AMOUNTS SUBJECT TO PRE-2015 TREATMENT	324		b
	OF WHICH: [INSERT NAME OF ADJUSTMENT]			
	OF WHICH: ...			
27	Regulatory adjustments applied to Common Equity Tier 1 due to insufficient Additional Tier 1 and Tier 2 to cover deductions			
28	Total regulatory adjustments to Common equity Tier 1	324	540	
29	Common Equity Tier 1 capital (CET1)	242,600		
Additional Tier 1 capital: instruments				
30	Directly issued qualifying Additional Tier 1 instruments plus related stock surplus			
31	of which: classified as equity under applicable accounting standards			
32	of which: classified as liabilities under applicable accounting standards			
33	Directly issued capital instruments subject to phase out from Additional Tier 1			
34	Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group AT1)			
35	of which: instruments issued by subsidiaries subject to phase out			
36	Additional Tier 1 capital before regulatory adjustments	-		
Additional Tier 1 capital: regulatory adjustments				
37	Investments in own Additional Tier 1 instruments			
38	Reciprocal cross-holdings in Additional Tier 1 instruments			
39	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above 10% threshold)			
40	Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)			
41	National specific regulatory adjustments			

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Table 16: Composition of Capital Common Template (transition) as at 30 June 2017 (continued).

		Component of regulatory capital reported by bank	Amounts subject to pre 2015 treatment	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation from step 2
Common Equity Tier 1 capital: instruments and reserves				
	REGULATORY ADJUSTMENTS APPLIED TO ADDITIONAL TIER 1 IN RESPECT OF AMOUNTS SUBJECT TO PRE-2015 TREATMENT			
42	Regulatory adjustments applied to Additional Tier 1 due to insufficient Tier 2 to cover deductions			
43	Total regulatory adjustments to Additional Tier 1 capital			
44	Additional Tier 1 capital (AT1)	-		
45	Tier 1 capital (T1 = CET1 + AT1)	242,600		
Tier 2 capital: instruments and provisions				
46	Directly issued qualifying Tier 2 instruments plus related stock surplus			
47	Directly issued capital instruments subject to phase out from Tier 2			
48	Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier 2)			
49	of which: instruments issued by subsidiaries subject to phase out			
50	Provisions	120		a
51	Tier 2 capital before regulatory adjustments	120		
Tier 2 capital: regulatory adjustments				
52	Investments in own Tier 2 instruments			
53	Reciprocal cross-holdings in Tier 2 instruments			
54	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above the 10% threshold) .			
55	Significant investments in the capital banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)			
56	National specific regulatory adjustments			
	REGULATORY ADJUSTMENTS APPLIED TO TIER 2 IN RESPECT OF AMOUNTS SUBJECT TO PRE-2015 TREATMENT			
57	Total regulatory adjustments to Tier 2 capital	120		
58	Tier 2 capital (T2)	120		
59	Total capital (TC = T1 + T2)	242,720		
	RISK WEIGHTED ASSETS IN RESPECT OF AMOUNTS SUBJECT TO PRE-2015 TREATMENT			
60	Total risk weighted assets	151,437		
Capital ratios				
61	Common Equity Tier 1 (as a percentage of risk weighted assets)		130.0%	
62	Tier 1 (as a percentage of risk weighted assets)		130.0%	
63	Total capital (as a percentage of risk weighted assets)		130.0%	
64	Institution specific buffer requirement (minimum CET1 requirement plus capital conservation buffer plus countercyclical buffer requirements plus D-SIB buffer requirement expressed as a percentage of risk weighted assets)		9%	
65	of which: capital conservation buffer requirement		2.5%	
66	of which: bank specific countercyclical buffer requirement (N/A)		NA	
67	of which: D-SIB buffer requirement (N/A)		NA	
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk weighted assets)		130.0%	
National minima including CCB (if different from Basel 3)				
69	CBB Common Equity Tier 1 minimum ratio		9.0%	
70	CBB Tier 1 minimum ratio		10.50%	
71	CBB total capital minimum ratio		12.50%	
Amounts below the thresholds for deduction (before risk weighting)				
72	Non-significant investments in the capital of other financials			
73	Significant investments in the common stock of financials			
74	Mortgage servicing rights (net of related tax liability)			
75	Deferred tax assets arising from temporary differences (net of related tax liability)			
Applicable caps on the inclusion of provisions in Tier 2				
76	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to standardised approach (prior to application of cap)		120	a
77	Cap on inclusion of provisions in Tier 2 under standardised approach			
78	N/A			
79	N/A			
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2020 and 1 Jan 2024)				
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			

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Table 17: Main features of regulatory capital instruments

1	Issuer	Eskan Bank B.S.C (c)
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	NA
3	Governing law(s) of the instrument	All applicable laws and regulations of the Kingdom of Bahrain
<i>Regulatory treatment</i>		
4	Transitional CBB rules	NA
5	Post-transitional CBB rules	NA
6	Eligible at solo/group/group & solo	Solo & Group
7	Instrument type (types to be specified by each jurisdiction)	Equity Share
8	Amount recognised in regulatory capital (Currency in mil, as of most recent reporting date)	BD 108,300
9	Par value of instrument	BD 100
10	Accounting classification	Shareholders' equity
11	Original date of issuance	1979 , 2011
12	Perpetual or dated	Perpetual
13	Original maturity date	No maturity date
14	Issuer call subject to prior supervisory approval	No
15	Optional call date, contingent call dates and redemption amount	NA
16	Subsequent call dates, if applicable	NA
<i>Coupons / dividends</i>		
17	Fixed or floating dividend/coupon	Dividends as decided by the shareholders.
18	Coupon rate and any related index	NA
19	Existence of a dividend stopper	NA
20	Fully discretionary, partially discretionary or mandatory	Fully discretionary
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Non-cumulative
23	Convertible or non-convertible	NA
24	If convertible, conversion trigger (s)	NA
25	If convertible, fully or partially	NA
26	If convertible, conversion rate	NA
27	If convertible, mandatory or optional conversion	NA
28	If convertible, specify instrument type convertible into	NA
29	If convertible, specify issuer of instrument it converts into	NA
30	Write-down feature	NA
31	If write-down, write-down trigger(s)	No
32	If write-down, full or partial	NA
33	If write-down, permanent or temporary	NA
34	If temporary write-down, description of write-up mechanism	NA
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	NA
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	NA