

Banking Disclosure Statement 31 December 2019 (Unaudited)

BANKING DISCLOSURE STATEMENT (unaudited)

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Prefixes contained in the table names, where applicable, represent the reference codes of the standard disclosure templates and tables issued by the HKMA.

Introduction

Purpose

The information contained in this document is for Hang Seng Bank Limited ("the Bank") and its subsidiaries (together "the Group"). It should be read in conjunction with the Group's 2019 Annual Report. The Group's Annual Report and the Banking Disclosure Statement, taken together, comply with both the Banking (Disclosure) Rules ("BDR") made under section 60A of the Banking Ordinance and the Financial Institutions (Resolution) (Loss-absorbing Capacity Requirements - Banking Sector) Rules ("LAC Rules") made under section 19(1) of the Financial Institutions (Resolution) Ordinance ("FIRO").

These banking disclosures are governed by the Group's disclosure policy, which has been approved by the Board. The disclosure policy sets out the governance, control and assurance requirements for publication of the document. While the Banking Disclosure Statement is not required to be externally audited, the document has been subject to independent review in accordance with the Group's policies on disclosure and its financial reporting and governance processes.

Basis of preparation

Except where indicated otherwise, the financial information contained in this Banking Disclosure Statement has been prepared on a consolidated basis. The basis of consolidation for regulatory purposes is different from that for accounting purposes. Information regarding subsidiaries that are not included in the consolidation for regulatory purposes is set out in the "Basis of consolidation" section in this document.

The information in this document is not audited and does not constitute statutory accounts.

Certain financial information in this document is extracted from the statutory accounts for the year ended 31 December 2019 which will be delivered to the Registrar of Companies and the Hong Kong Monetary Authority ("HKMA"). The Auditors expressed an unqualified opinion on those statutory accounts in their report dated 18 February 2020. The Auditor's Report did not include a reference to any matters to which the auditor drew any attention by way of emphasis without qualifying their report; and did not contain a statement under sections 406(2), 407(2) or (3) of the Hong Kong Companies Ordinance (Cap.622). The Group's 2019 Annual Report, which include the statutory accounts, can be viewed on our website, www.hangseng.com.

The Banking Disclosure Statement

The Group's Banking Disclosure Statement at 31 December 2019 comprises information required under the framework of the Basel Committee on Banking Supervision ("BCBS"). The disclosures are made in accordance with the latest BDR and the LAC Rules issued by the HKMA.

According to the BDR and the LAC Rules, disclosure of comparative information is not required unless otherwise specified in the standard disclosure templates. Prior period disclosures can be found in the Regulatory Disclosures section of our website, www.hangseng.com.

The Banking Disclosure Statement includes the majority of the information required under the BDR and the LAC Rules. The remainder of the disclosure requirements are covered in the Group's 2019 Annual Report which can be found in the "About Hang Seng – Investor Relations – Financial Statements" section of our website, www.hangseng.com.

Disclosure requirements covered in the Group's 2019 Annual Report:

- BDR Section 16FJ LIQA: Liquidity risk management on pages 78 to 83
- BDR Section 16J The Group's definition of "Impaired" and "Renegotiated" and the methods adopted for determining impairments in note 2(j) on pages 175 to 180
- BDR Sections 16ZS, 16ZT, 16ZU, 16ZV Remuneration on pages 119 to 120, 122 to 124
- BDR Section 44 Assets used as security in note 29 on pages 203 to 204
- BDR Section 46 The general disclosure of the major business activities and product lines in note 4 on pages 186 to 187 and note 20 on pages
 193 to 196 respectively
- BDR Section 52 Corporate governance on pages 110 to 139

Loss-absorbing capacity disclosures

The LAC Rules in Hong Kong were implemented in December 2018. Following classification under these rules by the HKMA, entities in Hong Kong are required to issue loss-absorbing capacity ("LAC") instruments that can be written down or converted in the event of failure.

On 1 April 2019, the Group was classified as a material subsidiary by the HKMA. Following this classification, the Group is required to publish LAC disclosures in accordance with the LAC Rules from 30 September 2019, subsequent to conformance with the LAC requirements from 1 July 2019. The basis of calculating the Group's LAC and risk-weighted asset ("RWA") is in accordance with the LAC Rules. The disclosures are made in accordance with the standard disclosure templates as issued by the HKMA.

Table 1: KM1 – Key prudential ratios

		_					
			a	b	С	d	e
		_			At		
			31 Dec	30 Sep	30 Jun	31 Mar	31 Dec
	Footnote	es	2019	2019	2019	2019	2018
	Regulatory capital (HK\$m)	1					
1	Common Equity Tier 1 ("CET1")		111,560	107,781	105,945	102,947	101,724
2	Tier 1		123,304	119,525	117,689	109,928	108,705
3	Total capital		137,249	133,610	131,747	123,574	123,307
	Risk-weighted asset ("RWA") (HK\$m)	1					
4	Total RWA		658,856	651,970	647,067	627,076	611,885
	Risk-based regulatory capital ratios (as a percentage of RWA)	1					
5	CET1 ratio (%)		16.9	16.5	16.4	16.4	16.6
6	Tier 1 ratio (%)		18.7	18.3	18.2	17.5	17.8
7	Total capital ratio (%)		20.8	20.5	20.4	19.7	20.2
	Additional CET1 buffer requirements (as a percentage of RWA)	1					
8	Capital conservation buffer requirement (%)		2.500	2.500	2.500	2.500	1.875
9	Countercyclical capital buffer ("CCyB") requirement (%)	2	1.645	2.067	2.085	2.053	1.550
10	Higher loss absorbency requirements (%)						
	(applicable only to Global systemically important authorised institutions						
	("G-SIBs") or Domestic systemically important authorised institutions ("D-						
	SIBs"))	3	1.500	1.500	1.500	1.500	1.125
_	Total AI-specific CET1 buffer requirements (%)		5.645	6.067	6.085	6.053	4.550
12	CET1 available after meeting the AI's minimum capital requirements (%)		12.4	12.0	11.9	11.5	11.8
	Basel III leverage ratio	4					
_	Total leverage ratio ("LR") exposure measure (HK\$m)		1,572,114	1,537,718	1,559,690	1,486,257	1,477,001
14	LR (%)		7.8	7.8	7.5	7.4	7.4
	Liquidity Coverage Ratio ("LCR")	5					
	Total high quality liquid assets ("HQLA") (HK\$m)		324,034	331,860	318,938	321,198	293,081
16	Total net cash outflows (HK\$m)		161,484	158,122	161,027	153,066	140,330
17	LCR (%)		201.8	210.5	198.5	210.8	209.1
	Net Stable Funding Ratio ("NSFR")	6					
18	***************************************		1,137,453	1,115,891	1,127,803	1,076,544	1,076,646
19	4		762,817	751,178	739,544	716,178	699,089
20	NSFR (%)		149.1	148.6	152.5	150.3	154.0

- 1 The regulatory capital, RWA, risk-based regulatory capital ratios and additional CET1 buffer requirements above are based on or derived from the information as contained in the "Capital Adequacy Ratio (MA(BS)3)" return submitted to the HKMA on a consolidated basis under the requirements of section 3C(1) of the Banking (Capital) Rules ("BCR").
- 2 At 4Q 2019, the jurisdictional CCyB of Hong Kong used in the calculation of the CCyB requirement was 2.0%, which was reduced from 2.5% at 3Q 2019 in accordance with the announcement made by the HKMA on 14 October 2019. The jurisdictional CCyB of other countries used in the calculation of the CCyB requirement ranged from 0% to 2.5%.
- 3 On 24 December 2019, the HKMA announced a reduction in the higher loss absorbency requirement for the Bank from 1.5% to 1.0% effective from 1 January 2020.
- 4 The Basel III leverage ratios are disclosed in accordance with the information contained in the "Leverage Ratio (MA(BS)27)" return submitted to the HKMA under the requirements specified in Part 1C of the BCR.
- 5 The LCRs shown are the simple average values of all working days in the reporting periods and are made in accordance with the requirements specified in the "Liquidity Position (MA(BS)1E)" return submitted to the HKMA under rule 11(1) of the Banking (Liquidity) Rules ("BLR").
- 6 The NSFR disclosures are made in accordance with the information contained in the "Stable Funding Position (MA(BS)26)" return submitted to the HKMA under the requirements specified in rule 11(1) of the BLR.

Overview of Risk Management

Our risk management framework

We use an enterprise-wide, risk management framework across the organisation and across all risk types. It is underpinned by our risk culture.

The framework fosters continuous monitoring of the risk environment, and promotes risk awareness and sound operational and strategic decision making. It also ensures we have a consistent approach to monitoring, managing and mitigating the risks we accept and incur in our activities. Further information on our risk management framework is set out on page 42 of the Group's 2019 Annual Report. The measurement and management of principal risks facing the Group is described on pages 47 to 49 of the Group's 2019 Annual Report.

Risk culture

We have long recognised the importance of a strong risk culture. Our risk culture is reinforced by HSBC Values. It is instrumental in aligning the behaviours of individuals with our attitude to assuming and managing risk, which helps to ensure that our risk profile remains in line with our risk appetite. The fostering of a strong risk culture is a key responsibility of our senior executives.

Our risk culture is further reinforced by our approach to remuneration. Individual awards, including those for senior executives, are based on compliance with HSBC Values and the achievement of financial and non-financial objectives that are aligned to our risk appetite and strategy.

Risk governance

The Board has ultimate responsibility for the effective management of risk and approves the risk appetite. It is advised by the Risk Committee.

Executive accountability for the ongoing monitoring, assessment and management of the risk environment and the effectiveness of the risk management framework resides with the Group's Chief Risk Officer, supported by the Risk Management Meeting ("RMM").

Day-to-day responsibility for risk management is delegated to senior managers with individual accountability for decision making. All employees have a role to play in risk management. These roles are defined using the Three Lines of Defence model, which takes into account the Group's business and functional structures.

We use a defined executive risk goverance structure to ensure appropriate oversight and accountability for risk, which facilitates the reporting and escalation to the RMM.

Risk appetite

Risk appetite is a key component of our management of risk. It sets out the aggregate level and types of risk that we are willing to accept in achieving our medium to long-term strategic goals. Within the Group, risk appetite is managed through a global risk appetite framework and articulated in a Risk Appetite Statement ("RAS"), which is approved by the Board on the advice of the Group's Risk Committee.

The RMM regularly reviews the Group's actual risk appetite profile against the limits set out in the RAS on monthly basis to enable senior management to monitor the risk profile and guide business activities in order to balance risk and return. The actual risk appetite profile is also reported to the Risk Committee and Board from Chief Risk Officer including material deviation and related management mitigating actions.

The Group's risk appetite informs our strategic and financial planning process, defining the desired forward-looking risk profile of the Group. It is also integrated within other risk management tools, such as the top and emerging risks report and stress testing, to ensure consistency in risk management. Information on our risk management tools is set out on pages 44 to 45 of the Group's 2019 Annual Report. Details on the Group's overarching risk appetite are set out in the global risk appetite framework.

Stress testing

The Group operates a wide-ranging stress testing programme that supports our risk management and capital planning. It includes execution of stress tests mandated by our regulators. Our stress testing is supported by dedicated teams and infrastructure.

Our testing programme assesses our capital strength through a rigorous examination of our resilience to external shocks. It also helps us understand and mitigate risks, and informs our decision about capital levels. As well as taking part in regulatory driven stress tests, we conduct our own internal stress tests.

Stress test results are reported, where appropriate, to the RMM and the Group's Risk Committee which oversees the Group's stress testing programme.

The Group's Risk functions

The Group's Risk function, headed by the Group's Chief Risk Officer, is responsible for enterprise-wide risk oversight. This includes establishing policy, monitoring risk profiles and forward-looking risk identification and management. The Group's Risk function is made up of sub-functions covering all risks to our operations. They are independent from business functions in order to provide challenge, appropriate oversight and balance in risk/return decisions.

Risk management and internal control systems

The Directors are responsible for maintaining and reviewing the effectiveness of risk management and internal control systems, and for determining the aggregate level and risk types they are willing to accept in achieving the Group's business objectives.

On behalf of the Board, the Group's Audit Committee has responsibility for oversight of risk management and internal controls over financial reporting, and the Group's Risk Committee has responsibility for oversight of risk management and internal controls other than for financial reporting.

The Directors, through the Group's Risk Committee and the Group's Audit Committee, conduct an annual review of the effectiveness of our system of risk management and internal control. The Group's Risk Committee and the Group's Audit Committee received confirmation that executive management has taken or is taking the necessary actions to remedy any failings or weaknesses identified through the operation of our framework of controls.

Risk measurement and reporting systems

Our risk measurement and reporting systems are designed to help ensure that risks are comprehensively captured with all the attributes necessary to support well-founded decisions, that those attributes are accurately assessed, and that information is delivered in a timely manner for those risks to be successfully managed and mitigated.

Risk measurement and reporting systems are also subject to a governance framework designed to ensure that their build and implementation are fit for purpose and functioning appropriately. Risk information systems development is a key responsibility of the Risk and IT functions, while the development and operation of risk rating and management systems and processes are ultimately subject to the oversight of the Board.

We continue to invest significant resources in IT systems and processes in order to maintain and improve our risk management capabilities. Group policy promotes the deployment of preferred technology where practicable. Group standards govern the procurement and operation of systems used in our subsidiaries to process risk information within business lines and risk functions.

Risk measurement and reporting structures deployed at Group level are applied throughout global businesses and major operating subsidiaries through a common operating model for integrated risk management and control. This model sets out the respective responsibilities of Group, global business and country level risk functions in respect of such matters as risk governance and oversight, compliance risks, approval authorities and lending guidelines, global and local scorecards, management information and reporting, and relations with third parties, including regulators, rating agencies and auditors.

Risk analytics and model governance

The Group's Risk functions manage a number of analytics disciplines supporting the development and management of models, including those for risk rating, scoring, economic capital and stress testing models covering different risk types and business segments. The analytics functions formulate technical responses to industry developments and regulatory policy in the field of risk analytics, supports the development of the HSBC Group's global risk model, develop local risk model and oversee the use around the Group toward our implementation targets for IRB approaches.

The HSBC Group Model Oversight Committee ("MOC") is the primary committee responsible for the oversight of Model Risk globally within HSBC Group. It serves an important role in providing strategic direction on the management of models and their associated risks to HSBC's businesses globally and is an essential element of the governance structure for model risk management. MOC is supported by Functional MOCs at the global, regional and site levels which are responsible for model risk management within their function areas, including wholesale credit risk, market risk, retail risk, and finance.

Models are also subject to an independent validation process and governance oversight by the Model Risk Management team within the HSBC Global Risk. The Independent Model Review within Model Risk Management team provides robust challenge to the modelling approaches used across the HSBC Group, including the Bank, and ensures that the performance of those models is transparent and that their limitations are visible to key stakeholders. Information on key developments of model risk governance for the Group during the year can be found on page 95 of the Group's 2019 Annual Report.

Linkage to the 2019 Annual Report

Basis of consolidation

The basis of consolidation for financial accounting purposes is in accordance with Hong Kong Financial Reporting Standards ("HKFRS"), as described in note 1 on the consolidated financial statements in the Group's 2019 Annual Report.

The basis of consolidation for regulatory purposes is different from that for accounting purposes. Subsidiaries included in the consolidation for regulatory purposes are specified in a notice from the HKMA in accordance with section 3C(1) of the BCR.

Subsidiaries not included in consolidation for regulatory purposes are securities and insurance companies that are authorised and supervised by regulators and are subject to supervisory arrangements regarding the maintenance of adequate capital to support business activities comparable to those prescribed for authorised institutions ("AI") under the BCR and the Banking Ordinance. The capital invested by the Group in these subsidiaries is deducted from the capital base subject to certain thresholds, as determined in accordance with Part 3 of the BCR.

For insurance entities, the present value of in-force long-term insurance business ("PVIF") asset of HK\$20,469m and the related deferred tax liability of HK\$3,377m are only recognised on consolidation in financial reporting and are therefore not included in the asset or equity positions for the stand-alone entities presented in the below table.

As at 31 December 2019, there are no subsidiaries which are included within both the accounting scope of consolidation and the regulatory scope of consolidation but the method of consolidation differs.

There are also no subsidiaries which are included within the regulatory scope of consolidation but not included within the accounting scope of consolidation as at 31 December 2019.

The Group operates subsidiaries in different territories where capital is governed by local rules and there may be restrictions on the transfer of regulatory capital and funds between members of the Group.

The Group maintains a regulatory reserve to satisfy the provisions of the Banking Ordinance and local regulatory requirements for prudential supervision purposes. As at 31 December 2019, the effect of this requirement is to restrict the amount of reserves which can be distributed to shareholders by HK\$3,509m.

There are no relevant capital shortfalls in any of the Group's subsidiaries which are not included in its consolidation group for regulatory purposes as at 31 December 2019.

A list of subsidiaries not included in consolidation for regulatory purposes is shown below:

Table 2: List of subsidiaries outside the regu	latory scope of consolidation
--	-------------------------------

		As at 31 De	ec 2019
	Principal activities	Total assets* HK\$m	Total equity* HK\$m
Hang Seng Investment Management Ltd	Fund management	1,194	1,140
Hang Seng Investment Services Ltd	Provision of investment commentaries	9	9
Hang Seng Securities Ltd	Stockbroking	3,030	899
Hang Seng Insurance Co. Ltd and its subsidiaries	Retirement benefits and life assurance	148,870	12,332
Hang Seng Qianhai Fund Management Co. Ltd	Fund raising, fund sales and asset management	370	357

^{*} Prepared in accordance with HKFRS

The approaches used in calculating the Group's regulatory capital and RWA are in accordance with the BCR. The Group uses the advanced internal ratings-based ("IRB") approach to calculate its credit risk for the majority of its non-securitisation exposures. For counterparty credit risk, the Group uses the current exposure method to calculate its default risk exposures. For market risk, the Group uses an internal models approach to calculate its general market risk for the risk categories of interest rate and foreign exchange (including gold) exposures and the standardised (market risk) approach for calculating other market risk positions. For operational risk, the Group uses the standardised (operational risk) approach to calculate its operational risk.

Balance sheet reconciliation

The following table expands the balance sheet under the regulatory scope of consolidation to show separately the capital components that are reported in the "Composition of regulatory capital" template in Table 6. The capital components in this table contain a reference that shows how these amounts are included in Table 6.

Table 3: CC2 – Reconciliation of regulatory capital to balance sheet			
	a	b	С
	Balance sheet as in	Under regulatory	Cross-referenced
	published financial	scope of	to Definition of
	statements	consolidation	Capital
	As at 31 Dec 2019	As at 31 Dec 2019	Components
A	HK\$m	HK\$m	
Assets Cash and balances at central banks	13,038	13,038	
Trading assets	47,357	47,357	
Derivative financial instruments	7,338	7,330	
Financial assets designated and otherwise mandatorily measured at fair value	.,	.,	
through profit or loss	18,771	223	
Reverse repurchase agreements - non-trading	6,659	6,659	
Placings with and advances to banks	65,807	62,293	
Loans and advances to customers	942,930	944,296	
of which: Impairment allowances eligible for inclusion in Tier 2 capital		1,417	(1)
Financial investments	461,704	355,188	
Investment in subsidiaries	-	7,344	
Subordinated loans to subsidiaries	-	915	(2)
Interest in associates	2,520	-	
Investment properties	10,121	7,158	
Premises, plant and equipment	32,362	30,551	
Intangible assets	21,954	1,151	(3)
Other assets	46,430	29,245	(4)
of which: Deferred tax assets ("DTAs")		110 26	(4)
Defined benefit pension fund net assets Total assets	1,676,991	1,512,748	(3)
Liabilities	1,070,991	1,512,746	
Deposits from banks	2,491	2,491	
Current, savings and other deposit accounts	1,203,458	1,206,153	
Repurchase agreements – non-trading	1,878	1,878	
Trading liabilities	37,976	37,976	
Derivative financial instruments	7,462	7,435	
of which: Gains and losses due to changes in own credit risk on fair valued liabilities		9	(6)
Financial liabilities designated at fair value	29,580	29,151	
of which: Gains and losses due to changes in own credit risk on fair valued liabilities	· · · · · · · · · · · · · · · · · · ·	(4)	(7)
Certificates of deposit and other debt securities in issue	17,190	17,190	
Other liabilities	35,183	28,419	
Liabilities under insurance contracts	132,120	-	
Current tax liabilities	4,159	4,089	
Deferred tax liabilities	7,083	3,702	(0)
of which: Deferred tax liabilities related to intangible assets		124	(8)
Deferred tax liabilities related to defined benefit pension fund Subordinated liabilities	19,494	19,494	(9)
Total liabilities	1,498,074	1,357,978	
Equity	1,490,074	1,337,976	
Share capital	9,658	9,658	(10)
	133,734	109,718	(11)
Retained profits of which: Revaluation gains of investment properties	133,734	6,776	(12)
Regulatory reserve for general banking risks		3,509	(13)
Regulatory reserve eligible for inclusion in Tier 2 capital		1,459	(14)
Valuation adjustments		108	(15)
Other equity instruments	11,744	11,744	(16)
Other reserves	23,674	23,650	(17)
of which: Cash flow hedge reserve		7	(18)
Valuation adjustments		47	(19)
Revaluation reserve of properties		19,855	(20)
Total shareholders' equity	178,810	154,770	
Non-controlling interests	107	-	-
Total equity	178,917	154,770	
Total equity and liabilities	1,676,991	1,512,748	

Table 4: LI1 – Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories

			b		d	e	f	
		a	D	С	-	ng values of		g
			-		Carryi	ng values of	items:	not subject to
		Carrying	Carrying					capital
		values	values					require-
			under scope		subject to	subject to		ments or
			of regulatory	subject to	counterparty	U	subject to	subject to
		financial	con-	credit risk			market risk	deduction
		statements		framework			framework	
As at 31 Dec 2019	Footnotes	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
Assets				· · ·				
Cash and balances at central banks		13,038	13,038	13,038	-	-	-	-
Trading assets		47,357	47,357		-	-	47,357	-
Derivative financial instruments	1	7,338	7,330	-	7,020	_		310
Financial assets designated and otherwise		,	,		,		,	
mandatorily measured at fair value through	h							
profit or loss		18,771	223	46	177	-	-	-
Reverse repurchase agreements - non-trad	ing	6,659	6,659	-	6,659	-	-	-
Placings with and advances to banks		65,807	62,293	62,293	_	-	-	-
Loans and advances to customers		942,930	944,296	944,296	-	-	-	-
Financial investments		461,704	355,188	355,188	-	-	-	-
Investment in subsidiaries		-	7,344	7,344	-	-	-	-
Subordinated loans to subsidiaries		-	915	-	-	-	-	915
Interest in associates		2,520	-	-	-	-	-	-
Investment properties		10,121	7,158	7,158	-	-	-	-
Premises, plant and equipment		32,362	30,551	30,551	-	-	-	-
Intangible assets	2	21,954	1,151	-	-	-	-	1,027
Other assets	2, 3	46,430	29,245	28,525	584	-	-	132
Total assets		1,676,991	1,512,748	1,448,439	14,440	-	54,687	2,384
Liabilities								
Deposits from banks		2,491	2,491	-	-	-	-	2,491
Current, savings and other deposit account	ts	1,203,458	1,206,153	-	-	-	-	1,206,153
Repurchase agreements – non-trading		1,878	1,878	-	1,878	-	-	-
Trading liabilities		37,976	37,976	-	-	-	37,976	-
Derivative financial instruments	1	7,462	7,435	-	7,435	-	7,435	-
Financial liabilities designated at fair value	e	29,580	29,151	-	-	-	27	29,124
Certificates of deposit and other debt								
securities in issue		17,190	17,190	-	-	-	-	17,190
Other liabilities	3	35,183	28,419	-	370	-	-	28,049
Liabilities under insurance contracts		132,120	-	-	-	-	-	
Current tax liabilities		4,159	4,089	-		-	-	4,089
Deferred tax liabilities		7,083	3,702	-	-	-	-	3,702
Subordinated liabilities		19,494	19,494		-	-	-	19,494
Total liabilities		1,498,074	1,357,978	-	9,683	-	45,438	1,310,292

¹ Assets/liabilities arising from derivative contracts held in the regulatory trading book are subject to both market risk and counterparty credit risk because derivative contracts are mark to market and there is a risk that the counterparty may not be able to fulfil the contractual obligations. As a result, the amounts shown in column (b) do not equal the sum of columns (c) to (g).

 $^{2\ \}textit{The assets disclosed in column (g) are net of any associated deferred tax liability in accordance with HKMA requirement.}$

³ The difference in the carrying values reported in the financial statements in column (a) and the scope of regulatory consolidation in column (b) mainly represents (i) the differences between the financial and regulatory scope of consolidation, and (ii) the amounts of acceptance and endorsements being included as contingencies in accordance with the BCR, whilst for accounting purposes, acceptances and endorsements are recognised on the balance sheet.

Table 5: LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements

		Г		1		1	
			a	b	c	d	e
			_		Items su	bject to:	
						counterparty	
				credit risk	securitisation	credit risk	market risk
			Total	framework	framework	framework	framework
As	at 31 Dec 2019	Footnotes	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
1	Asset carrying value amount under scope of regulatory						
	consolidation (as per template LI1)	1	1,510,364	1,448,439	-	14,440	54,687
2	Liabilities carrying value amount under regulatory scope of						
	consolidation (as per template LI1)	2	47,686	-	-	9,683	45,438
3	Total net amount under regulatory scope of consolidation		1,462,678	1,448,439	-	4,757	9,249
4	Off-balance sheet amounts and potential future exposures						
	for counterparty risk		520,433	166,053	-	8,449	-
5	Differences due to impairments		3,410	3,410	-	-	-
6	Differences due to recognised collateral		(9,054)	(9,054)	-	-	-
7	Differences arising from off-balance sheet amounts						
	recognised in regulatory exposures		(354,380)	-	-	-	-
8	Differences due to credit risk mitigation		(1,504)	-	-	(1,504)	-
9	Differences arising from capital deductions		(128)	-	-	-	-
10	Exposure amounts considered for regulatory purposes		1,621,455	1,608,848	-	11,702	9,249

- 1 The amount shown in column (a) is equal to column (b) less column (g) in the Total assets row in Table 4.
- 2 The amount shown in column (a) is equal to column (b) less column (g) in the Total liabilities row in Table 4.

Explanations of differences between accounting and regulatory exposure amounts

Off-balance sheet amounts and potential future exposures for counterparty risk

Off-balance sheet amounts subject to credit risk regulatory framework includes undrawn portion of committed facilities, various trade finance commitments and guarantees, by applying credit conversion factor ("CCF") to these items and consideration of potential future exposures ("PFE") for counterparty credit risk.

Differences due to impairments

The carrying value of assets is net of impairments. From the regulatory perspective, only exposure value under the IRB approach and non-defaulted exposure under the standardised approach are before deducting impairments.

Differences due to recognised collateral

Exposure value under the standardised approach is calculated after deducting credit risk mitigation whereas accounting value is before such deductions.

Differences due to credit risk mitigation

In counterparty credit risk, differences arise between accounting carrying values and regulatory exposure as a result of the application of credit risk mitigation.

Explanations of differences between accounting fair value and regulatory prudent valuation

Fair value is defined as the best estimate of the price that would be received to sell an asset or be paid to transfer a liability in an orderly transaction between market participants at the measurement date.

Some fair value adjustments already reflect valuation uncertainty to some degree. These are market data uncertainty, model uncertainty and concentration adjustments.

However, it is recognised that a variety of valuation techniques using stressed assumptions and combined with the range of plausible market parameters at a given point in time may still generate unexpected uncertainty beyond fair value.

A series of additional valuation adjustments ("AVAs") are therefore required to reach a specified degree of confidence (the "Prudent Value") set by regulators that differs both in terms of scope and measurement from the Group's own quantification for disclosure purposes.

AVAs should consider at the minimum: market price uncertainty, bid-offer (close-out) uncertainty, model risk, concentration, administration costs, unearned credit spreads and investing and funding costs.

AVAs are not limited to level 3 exposures, for which a 95% uncertainty range is already computed and disclosed, but must also be calculated for any exposure for which the exit price cannot be determined with a high degree of certainty. Table 50 presents further information on the prudent valuation adjustment.

Capital and RWA

Regulatory capital disclosures

The following table sets out the detailed composition of the Group's regulatory capital using the composition of regulatory capital disclosures template as specified by the HKMA.

	6: CC1 – Composition of regulatory capital		
		a	b
			Cross-referenced
			to Table 3
			Source based on
			reference
			numbers/letters of
			the balance sheet
		Component of	under the
		regulatory capital	regulatory scope
	As at 31 Dec 2019	HK\$m	of consolidation
	CET1 capital: instruments and reserves		
1	Directly issued qualifying CET1 capital instruments plus any related share premium	9,658	(10)
2	Retained earnings	109,718	(11)
3	Disclosed reserves	23,650	(17)
4	Directly issued capital subject to phase-out arrangements from CET1 (only applicable to non-joint		
	stock companies)	Not applicable	Not applicable
5	Minority interests arising from CET1 capital instruments issued by consolidated bank subsidiaries		
	and held by third parties (amount allowed in CET1 capital of the consolidation group)	-	
6	CET1 capital before regulatory deductions	143,026	
	CET1 capital: regulatory deductions		
7	Valuation adjustments	155	(15) + (19)
8	Goodwill (net of associated deferred tax liability)		
9	Other intangible assets (net of associated deferred tax liabilities)	1,027	(3) - (8)
10	Deferred tax assets (net of associated deferred tax liabilities)	110	(4)
11	Cash flow hedge reserve	7	(18)
12	Excess of total EL amount over total eligible provisions under the IRB approach	-	
13	Credit-enhancing interest-only strip, and any gain-on-sale and other increase in the CET1 capital		
	arising from securitisation transactions	•	
14	Gains and losses due to changes in own credit risk on fair valued liabilities	5	(6) + (7)
15	Defined benefit pension fund net assets (net of associated deferred tax liabilities)	22	(5) - (9)
16	Investments in own CET1 capital instruments (if not already netted off paid-in capital on reported		
	balance sheet)	-	
17	Reciprocal cross-holdings in CET1 capital instruments	-	
18	Insignificant LAC investments in CET1 capital instruments issued by financial sector entities that are		
10	outside the scope of regulatory consolidation (amount above 10% threshold)	-	
19	Significant LAC investments in CET1 capital instruments issued by financial sector entities that are		
20	outside the scope of regulatory consolidation (amount above 10% threshold) Mortgage servicing rights (net of associated deferred tax liabilities)	Not applicable	Not applicable
21	Deferred tax assets arising from temporary differences (net of associated deferred tax liabilities)	Not applicable	
22	Amount exceeding the 15% threshold	Not applicable	Not applicable
23	of which: significant investments in the ordinary share of financial sector entities	Not applicable	Not applicable Not applicable
24	of which: mortgage servicing rights	Not applicable	Not applicable
25	of which: deferred tax assets arising from temporary differences	Not applicable	Not applicable
26		30,140	ног аррисавле
	National specific regulatory adjustments applied to CET1 capital Cumulative fair value gains arising from the revaluation of land and buildings (own-use and	30,140	
26a	investment properties)	26,631	(12) + (20)
26b	Regulatory reserve for general banking risks	3,509	(13)
26c	Securitisation exposures specified in a notice given by the Monetary Authority	2,507	(13)
26d	Cumulative losses below depreciated cost arising from the institution's holdings of land and buildings	<u> </u>	
26e	Capital shortfall of regulated non-bank subsidiaries	<u>-</u>	
26f	Capital investment in a connected company which is a commercial entity (amount above 15% of the	<u> </u>	
201	reporting institution's capital base)	-	
27	Regulatory deductions applied to CET1 capital due to insufficient additional tier 1 ("AT1") capital		
	and Tier 2 capital to cover deductions	-	
28	Total regulatory deductions to CET1 capital	31,466	

	6: CC1 – Composition of regulatory capital (continued)	a	b
		u	Cross-referenced
			to Table 3
			Source based or
			reference
			numbers/letters o
			the balance shee
		Component of	under the
		regulatory capital	regulatory scope of consolidation
	AT1 capital: instruments	HK\$m	of consolidation
0	Qualifying AT1 capital instruments plus any related share premium	11,744	
1	of which: classified as equity under applicable accounting standards	11,744	(16)
2	of which: classified as liabilities under applicable accounting standards	-	(= 0)
3	Capital instruments subject to phase-out arrangements from AT1 capital	-	
4	AT1 capital instruments issued by consolidated bank subsidiaries and held by third parties (amount		
	allowed in AT1 capital of the consolidation group)	-	
5	of which: ATI capital instruments issued by subsidiaries subject to phase-out arrangements	-	
6	AT1 capital before regulatory deductions	11,744	
	AT1 capital: regulatory deductions	<u>-</u>	
7	Investments in own AT1 capital instruments	-	
3	Reciprocal cross-holdings in AT1 capital instruments	-	
9	Insignificant LAC investments in AT1 capital instruments issued by financial sector entities that are outside the scope of regulatory consolidation (amount above 10% threshold)		
0	Significant LAC investments in AT1 capital instruments issued by financial sector entities that are	-	
J	outside the scope of regulatory consolidation	-	
1	National specific regulatory adjustments applied to AT1 capital	-	
2	Regulatory deductions applied to AT1 capital due to insufficient Tier 2 capital to cover deductions	-	
3	Total regulatory deductions to AT1 capital	-	
4	AT1 capital	11,744	
5	Tier 1 capital (T1 = CET1 + AT1)	123,304	
	Tier 2 capital: instruments and provisions		
6	Qualifying Tier 2 capital instruments plus any related share premium	-	
7	Capital instruments subject to phase-out arrangements from Tier 2 capital	-	
8	Tier 2 capital instruments issued by consolidated bank subsidiaries and held by third parties (amount allowed in Tier 2 capital of the consolidation group)		
9	of which: capital instruments issued by subsidiaries subject to phase-out arrangements	<u> </u>	
0	Collective provisions and regulatory reserve for general banking risks eligible for inclusion in Tier 2		
0	capital	2,876	(1) + (14)
1	Tier 2 capital before regulatory deductions	2,876	
	Tier 2 capital: regulatory deductions		
2	Investments in own Tier 2 capital instruments	-	
3	Reciprocal cross-holdings in Tier 2 capital instruments and non-capital LAC liabilities	-	
4	Insignificant LAC investments in Tier 2 capital instruments issued by, and non-capital LAC liabilities		
	of, financial sector entities that are outside the scope of regulatory consolidation (amount above 10% threshold and, where applicable, 5% threshold)		
4a	Insignificant LAC investments in non-capital LAC liabilities of financial sector entities that are	-	
	outside the scope of regulatory consolidation (amount formerly designated for the 5% threshold but		
	no longer meets the conditions) (for institutions defined as "section 2 institution" under §2(1) of		
	Schedule 4F to BCR only)	-	
5	Significant LAC investments in Tier 2 capital instruments issued by financial sector entities that are		
	outside the scope of regulatory consolidation (net of eligible short positions)	915	(2)
5a	Significant LAC investments in non-capital LAC liabilities of financial sector entities that are outside		
6	the scope of regulatory consolidation (net of eligible short positions) National specific regulatory adjustments applied to Tier 2 capital	(11,984)	
5 5a	Add back of cumulative fair value gains arising from the revaluation of land and buildings (own-use	(11,704)	
Ju	and investment properties) eligible for inclusion in Tier 2 capital	(11,984)	((12)+(20))*45%
6b	Regulatory deductions applied to Tier 2 capital to cover the required deductions falling within	(11,704)	((12) (20)) 13/0
	§48(1)(g) of BCR		
_	Total regulatory adjustments to Tier 2 capital	(11,069)	
7	Total regulatory angulations to Tier 2 capital		
8	Tier 2 capital (T2)	13,945	
7 8 9		13,945 137,249	

Tabl	e 6: CC1 – Composition of regulatory capital (continued)		
		a	b
			Cross-referenced to Table 3
			Source based on reference
			numbers/letters of
			the balance sheet
		Component of	under the
		regulatory capital	regulatory scope
		HK\$m	of consolidation
	Capital ratios (as a percentage of RWA)	<u> </u>	
61	CET1 capital ratio	16.9%	
62	Tier 1 capital ratio	18.7%	
63	Total capital ratio	20.8%	
64	Institution-specific buffer requirement (capital conservation buffer plus countercyclical capital		
	buffer plus higher loss absorbency requirements)	5.645%	
65	of which: capital conservation buffer requirement	2.500%	
66	of which: bank specific countercyclical capital buffer requirement	1.645%	
67	of which: higher loss absorbency requirement	1.500%	
68	CET1 (as a percentage of RWA) available after meeting minimum capital requirements	12.4%	
	National minima (if different from Basel 3 minimum)		
69	National CET1 minimum ratio	Not applicable	Not applicable
70	National Tier 1 minimum ratio	Not applicable	Not applicable
71	National Total capital minimum ratio	Not applicable	Not applicable
	Amounts below the thresholds for deduction (before risk weighting)		**
72	Insignificant LAC investments in CET1, AT1 and Tier 2 capital instruments issued by, and non-		
	capital LAC liabilities of, financial sector entities that are outside the scope of regulatory		
	consolidation	5,539	
73	Significant LAC investments in CET1 capital instruments issued by financial sector entities that are		
	outside the scope of regulatory consolidation	7,686	
74	Mortgage servicing rights (net of associated deferred tax liabilities)	Not applicable	Not applicable
75	Deferred tax assets arising from temporary differences (net of associated deferred tax liabilities)	Not applicable	Not applicable
	Applicable caps on the inclusion of provisions in Tier 2 capital		
76	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to the BSC approach, or the		
	STC approach and SEC-ERBA, SEC-SA and SEC-FBA (prior to application of cap)	661	
77	Cap on inclusion of provisions in Tier 2 under the BSC approach, or the STC approach, and SEC-		
	ERBA, SEC-SA and SEC-FBA	814	
78	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to the IRB approach and		
	SEC-IRBA (prior to application of cap)	2,215	
79	Cap for inclusion of provisions in Tier 2 under the IRB approach and SEC-IRBA	3,191	
	Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2018 and 1 Jan 2022)		
80	Current cap on CET1 capital instruments subject to phase-out arrangements	Not applicable	Not applicable
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	Not applicable	Not applicable
82	Current cap on AT1 capital instruments subject to phase-out arrangements		11
83	Amount excluded from AT1 capital due to cap (excess over cap after redemptions and maturities)	-	
84	Current cap on Tier 2 capital instruments subject to phase-out arrangements	-	
85	Amount excluded from Tier 2 capital due to cap (excess over cap after redemptions and maturities)	-	
0.5	Amount excluded from Tier 2 capital due to cap (excess over cap arter redemptions and maturities)	-	

Table 6: CC1 – Composition of regulatory capital (continued)

Notes to the template:

Elements where a more conservative definition has been applied in the BCR relative to that set out in Basel III capital standards:

		Hong Kong	Basel III
		basis	basis
	As at 31 Dec 2019	HK\$m	HK\$m
10	Deferred tax assets (net of associated deferred tax liabilities)	110	36

Explanation

As set out in paragraphs 69 and 87 of the Basel III text issued by the Basel Committee (December 2010), DTAs of the bank to be realised are to be deducted, whereas DTAs which relate to temporary differences may be given limited recognition in CET1 capital (and hence be excluded from deduction from CET1 capital up to the specified threshold). In Hong Kong, an AI is required to deduct all DTAs in full, irrespective of their origin, from CET1 capital. Therefore, the amount to be deducted as reported in row 10 may be greater than that required under Basel III.

The amount reported under the column "Basel III basis" in this box represents the amount reported in row 10 (i.e. the amount reported under the "Hong Kong basis") adjusted by reducing the amount of DTAs to be deducted which relate to temporary differences to the extent not in excess of the 10% threshold set for DTAs arising from temporary differences and the aggregate 15% threshold set for Mortgage servicing rights ("MSRs"), DTAs arising from temporary differences and significant investments in CET1 capital instruments issued by financial sector entities (excluding those that are loans, facilities and other credit exposures to connected companies) under Basel III.

Remarks:

The amount of the 10% threshold mentioned above is calculated based on the amount of CET1 capital determined in accordance with the deduction methods set out in BCR Schedule 4F. The 15% threshold is referring to paragraph 88 of the Basel III text issued by the Basel Committee (December 2010) and has no effect to the Hong Kong regime.

Countercyclical capital buffer ratio

The countercyclical capital buffer ("CCyB") is calculated as the weighted average of the applicable CCyB ratios in effect in the jurisdictions in which banks have private sector credit exposures. The Group uses country of business as the basis of geographical allocation for the majority of its credit risk and risk country for market risk, which is defined by considering the country of incorporation, location of guarantor, headquarter domicile, distribution of revenue and booking country.

Table 7: CCyB1 – Geographical distribution of credit exposures used in countercyclical capital buffer

As at 31 Dec 2019	Ī	a	c	d	e
	_		RWA used in		
		Applicable JCCyB	computation of	AI-specific CCyB	
Geographical breakdown by		ratio in effect	CCyB ratio	ratio	CCyB amount
Jurisdiction ("J")	Footnotes	%	HK\$m	%	HK\$m
1 Hong Kong SAR	1	2.000	456,386		
2 France		0.250	4		
3 Ireland		1.000	1		
4 Norway		2.500	1		
5 Sweden		2.500	119		
6 United Kingdom		1.000	1,406		
7 Sum	2		457,917		
8 Total	3		556,014	1.645	10,838

¹ At 4Q 2019, the jurisdictional CCyB of Hong Kong used in the calculation of CCyB requirement was 2.0%, which was reduced from 2.5% at 3Q 2019 in accordance with the announcement made by the HKMA on 14 October 2019.

² This represents the sum of RWA for the private sector credit exposures in jurisdictions with a non-zero countercyclical buffer rate.

³ The total RWA used in the computation of the CCyB ratio in column (c) represents the total RWA for the private sector credit exposures in all jurisdictions to which the bank is exposed, including jurisdictions with no countercyclical buffer rate or with a countercyclical buffer rate set at zero. The CCyB amount in column (e) represents the Group's total RWA multiplied by the AI-specific CCyB ratio in column (d).

Leverage ratio

The following table shows the leverage ratio, Tier 1 capital and total exposure measure as contained in the "Leverage Ratio" return submitted to the HKMA under the requirements specified in Part 1C of the BCR.

Tab	le 8: LR2 – Leverage ratio		
		a	b
		31 Dec	30 Sep
		2019	2019
		HK\$m	HK\$m
	On-balance sheet exposures		_
1	On-balance sheet exposures (excluding those arising from derivative contracts and securities financing		
	transactions ("SFTs"), but including collateral)	1,500,126	1,461,694
2	Less: Asset amounts deducted in determining Tier 1 capital	(31,462)	(31,891)
3	Total on-balance sheet exposures (excluding derivative contracts and SFTs)	1,468,664	1,429,803
	Exposures arising from derivative contracts		
4	Replacement cost associated with all derivative contracts (where applicable net of eligible cash variation		
	margin and/or with bilateral netting)	2,867	4,519
5	Add-on amounts for PFE associated with all derivative contracts	9,490	12,234
6	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the		
	applicable accounting framework	-	
7	Less: Deductions of receivables assets for cash variation margin provided under derivative contracts	-	
8	Less: Exempted central counterparty ("CCP") leg of client-cleared trade exposures	-	
9	Adjusted effective notional amount of written credit derivative contracts	-	_
10	Less: Adjusted effective notional offsets and add-on deductions for written credit derivative contracts	-	
11	Total exposures arising from derivative contracts	12,357	16,753
	Exposures arising from SFTs		
12	Gross SFT assets (with no recognition of netting), after adjusting for sale accounting transactions	8,817	7,327
13	Less: Netted amounts of cash payables and cash receivables of gross SFT assets	-	-
14	Counterparty credit risk ("CCR") exposure for SFT assets	215	388
15	Agent transaction exposures	-	-
16	Total exposures arising from SFTs	9,032	7,715
	Other off-balance sheet exposures		
17	Off-balance sheet exposure at gross notional amount	520,433	520,682
18	Less: Adjustments for conversion to credit equivalent amounts	(434,683)	(433,683)
19	Off-balance sheet items	85,750	86,999
	Capital and total exposures		
20	Tier 1 capital	123,304	119,525
20a	Total exposures before adjustments for specific and collective provisions	1,575,803	1,541,270
20b	Adjustments for specific and collective provisions	(3,689)	(3,552)
21	Total exposures after adjustments for specific and collective provisions	1,572,114	1,537,718
	Leverage ratio		
22	Leverage ratio	7.8%	7.8%

Table 9: LR1 – Summary comparison of accounting assets against leverage ratio exposure measure As at 31 Dec 2019 a Value under the LR framework Item HK\$m Total consolidated assets as per published financial statements 1,676,991 Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation (155,914)Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting standard but excluded from the LR exposure measure Adjustments for derivative contracts 5,027 Adjustment for SFTs (i.e. repos and similar secured lending) 215 Adjustment for off-balance sheet ("OBS") items (i.e. conversion to credit equivalent amounts of OBS exposures) 85,750 Adjustment for specific and collective provisions that are allowed to be excluded from exposure measure (3,689)Other adjustments (36,266)Leverage ratio exposure measure 1,572,114

Other adjustments mainly represent the regulatory deductions of property revaluation reserves and regulatory reserve to Tier 1 capital under the leverage ratio framework.

Overview of RWA and the minimum capital requirements

Table	e 10: OV1 – Overview of RWA			
		a	b	c
				Minimum
				capital
		RW	\mathbf{A}^1	requirements ²
		31 Dec	30 Sep	31 Dec
		2019	2019	2019
		HK\$m	HK\$m	HK\$m
1	Credit risk for non-securitisation exposures	522,893	517,038	44,031
2	Of which: Standardised credit risk ("STC") approach	64,940	61,306	5,195
2 <i>a</i>	Of which: Basic ("BSC") approach	-	-	-
3	Of which: Foundation internal ratings-based ("IRB") approach	-	-	-
4	Of which: Supervisory slotting criteria approach	14,272	12,989	1,210
5	Of which: Advanced IRB approach	443,681	442,743	37,626
6	Counterparty default risk and default fund contributions	2,514	2,668	212
7	Of which: Standardised approach for counterparty credit risk ("SA-CCR")*	Not applicable	Not applicable	Not applicable
7a	Of which: Current exposure method ("CEM")	2,439	2,582	206
8	Of which: Internal models (counterparty credit risk) ("IMM(CCR)") approach	-	-	<u>-</u>
9	Of which: Others	75	86	6
10	Credit valuation adjustment ("CVA") risk	2,256	2,273	180
11	Equity positions in banking book under the simple risk-weight method and the internal			
	models method	22,293	18,852	1,890
12	Collective investment scheme ("CIS") exposures – Look-through approach ("LTA")*	Not applicable	Not applicable	Not applicable
13	CIS exposures – Mandate-based approach ("MBA")*	Not applicable	Not applicable	Not applicable
14	CIS exposures – Fall-back approach ("FBA")*	Not applicable	Not applicable	Not applicable
14a	CIS exposures – combination of approaches*	Not applicable	Not applicable	Not applicable
15	Settlement risk	-	-	
16	Securitisation exposures in banking book	-	-	<u> </u>
17	Of which: Securitisation internal ratings-based ("SEC-IRBA") approach	-	-	<u> </u>
18	Of which: Securitisation external ratings-based ("SEC-ERBA") approach			
	(including internal assessment approach ("IAA"))	-	-	<u> </u>
19	Of which: Securitisation standardised ("SEC-SA") approach	-	-	<u> </u>
19a	Of which: Securitisation fall-back ("SEC-FBA") approach	•		-
20	Market risk	8,357	12,412	668
21	Of which: Standardised market risk ("STM") approach	101	112	8
22	Of which: Internal models ("IMM") approach	8,256	12,300	660
23	Capital charge for switch between exposures in trading book and banking book	N	37 . 11 11	N
	(not applicable before the revised market risk framework takes effect)*	Not applicable	Not applicable	Not applicable
24	Operational risk	65,868	64,644	5,270
24a	Sovereign concentration risk	-	-	
25	Amounts below the thresholds for deduction (subject to 250% Risk-weight ("RW"))	19,215	19,132	1,629
26	Capital floor adjustment	-	- 44.04.0	- (1.170)
26a	Deduction to RWA	(14,647)	(14,816)	(1,172)
26b	Of which: Portion of regulatory reserve for general banking risks and			
	collective provisions which is not included in Tier 2 Capital	-	-	<u>-</u>
26c	Of which: Portion of cumulative fair value gains arising from the revaluation	د د د د د د	/14035	/ -
27	of land and buildings which is not included in Tier 2 Capital	(14,647)	(14,816)	(1,172)
27	Total	628,749	622,203	52,708

- 1 RWA in this table are before the application of the 1.06 scaling factor, where applicable.
- 2 Minimum capital requirement represents the Pillar 1 capital charge at 8% of the RWA after application of the 1.06 scaling factor, where applicable.
- 3 Items marked with an asterisk (*) will be applicable only after their respective policy frameworks take effect. Until then, "Not applicable" is reported in the rows.

Total RWA increased by HK\$6.5bn since last quarter. Credit risk RWA for non-securitisation exposures was the key contributor which increased by HK\$5.9bn mainly driven by loan growth. RWA on equity positions in banking book under the simple risk-weight method increased by HK\$3.4bn due to value appreciation on holding. Operational risk RWA increased by HK\$1.2bn due to growth in gross income. The movement was partly offset by a drop in market risk RWA by HK\$4.1bn mainly driven by changes in Offshore Chinese Yuan ("CNH") interest rate trading positions.

RWA flow statements

RWA flow statement for credit risk

Table 11: CR8 – RWA flow statement of credit risk exposures under IRB approach

		a
		Amount
		HK\$m
1	RWA as at end of previous reporting period (30 Sep 2019)	455,732
2	Asset size	5,542
3	Asset quality	(3,611)
4	Model updates	-
5	Methodology and policy	<u>-</u>
6	Acquisitions and disposals	-
7	Foreign exchange movements	794
8	Other	(504)
9	RWA as at end of reporting period (31 Dec 2019)	457,953

¹ Credit risk in this table represents the credit risk for non-securitisation exposures excluding counterparty credit risk.

RWA increased by HK\$2.2bn during the fourth quarter of 2019. It was mainly due to an increase of HK\$5.5bn from asset size driven by loan growth and partly offset by a decrease of HK\$3.6bn from the change in asset quality.

RWA flow statement for market risk

Table 12: MR2 – RWA flow statement of market risk exposures under IMM approach

		a	b	c	d	e	f
	-	Value at risk ("VaR") HK\$m	Stressed VaR HK\$m	Incremental risk charge ("IRC") HK\$m	risk charge ("CRC")	Other HK\$m	Total RWA HK\$m
1	RWA as at end of previous reporting period	3,649	8,651				12,300
2	(30 Sep 2019) Movement in risk levels	250	(4,216)	<u>.</u>	<u> </u>	<u> </u>	(3,966)
3	Model updates/changes	-	•	-	-	-	-
4	Methodology and policy	-	-	-	-	-	-
5	Acquisitions and disposals	-	-	-	-	-	-
6	Foreign exchange movements	(23)	(55)	-	-	-	(78)
7	Other	-	-	-	-	-	-
8	RWA as at end of reporting period (31 Dec 2019)	3,876	4,380	-	-	-	8,256

The decrease in market risk RWA was mainly driven by changes in CNH interest rate trading positions.

Loss-absorbing capacity

Table 13: KM2(A) – Key metrics – LAC requirements

	•						
			a	b	c	d	e
		-			At ¹		
		•	31 Dec	30 Sep	30 Jun	31 Mar	31 Dec
	Footnotes	otnotes	2019	2019	2019	2019	2018
Of	the material entity at LAC consolidation group level						
1	Internal loss-absorbing capacity available (HK\$m)		156,743	153,126	N/A	N/A	N/A
2	Risk-weighted amount under the LAC Rules (HK\$m)		658,856	651,970	N/A	N/A	N/A
3	Internal LAC risk-weighted ratio (%)		23.8	23.5	N/A	N/A	N/A
4	Exposure measure under the LAC Rules (HK\$m)		1,571,199	1,536,803	N/A	N/A	N/A
5	Internal LAC leverage ratio (%)		10.0	10.0	N/A	N/A	N/A
6a	Does the subordination exemption in the antepenultimate paragraph of		Not	Not	Not	Not	Not
	Section 11 of the FSB TLAC Term Sheet apply?	2	applicable	applicable	applicable	applicable	applicable
6b	Does the subordination exemption in the penultimate paragraph of Section		Not	Not	Not	Not	Not
	11 of the FSB TLAC Term Sheet apply?	2	applicable	applicable	applicable	applicable	applicable
6c	If the capped subordination exemption applies, the amount of funding						
	issued that ranks pari passu with excluded liabilities and that is recognised						
	as external loss-absorbing capacity, divided by funding issued that ranks						
	pari passu with excluded liabilities and that would be recognised as		Not	Not	Not	Not	Not
	external loss-absorbing capacity if no cap was applied	2	applicable	applicable	applicable	applicable	applicable

¹ The LAC disclosures for the Group commences on 30 September 2019 in accordance with the LAC Rules, accordingly the prior periods' ratios are not available.

² The subordination exemptions under Section 11 of the Financial Stability Board ("FSB") Total Loss-absorbing Capacity Term Sheet ("TLAC Term Sheet") do not apply in Hong Kong under the LAC Rules.

Table 14: TLAC1(A) – TLAC composition

		a
		Amount
	As at 31 Dec 2019	HK\$m
	Regulatory capital elements of internal loss-absorbing capacity and adjustments	
1	Common Equity Tier 1 ("CET1") capital	111,560
2	Additional Tier 1 ("AT1") capital before LAC adjustments	11,744
3	AT1 capital instruments ineligible as internal loss-absorbing capacity as not issued directly or indirectly to, and held directly	
	or indirectly by, the resolution entity or non-HK resolution entity in the material subsidiary's resolution group	-
4	Other adjustments	-
5	AT1 capital eligible under the LAC Rules	11,744
6	Tier 2 ("T2") capital before LAC adjustments	13,945
7	Amortised portion of T2 capital instruments that are internal LAC debt instruments issued directly or indirectly to, and held	
	directly or indirectly by, the resolution entity or non-HK resolution entity in the material subsidiary's resolution group	-
8	T2 capital instruments ineligible as internal loss-absorbing capacity as not issued directly or indirectly to, and held directly or	
	indirectly by, the resolution entity or non-HK resolution entity in the material subsidiary's resolution group	_
9	Other adjustments	-
10	T2 capital eligible under the LAC Rules	13,945
11	Internal loss-absorbing capacity arising from regulatory capital	137,249
	Non-regulatory capital elements of internal loss-absorbing capacity	
12	Internal non-capital LAC debt instruments issued directly or indirectly to, and held indirectly or indirectly by, the resolution	
	entity or non-HK resolution entity in the material subsidiary's resolution group	19,494
17	Internal loss-absorbing capacity arising from non-capital LAC debt instruments before adjustments	19,494
	Non-regulatory capital elements of internal loss-absorbing capacity: adjustments	
18		156,743
19	Deductions of exposures between the material subsidiary's LAC consolidation group and group companies outside that group	
	that correspond to non-capital items eligible for internal loss-absorbing capacity	-
20	Deduction of holdings of its own non-capital LAC liabilities	-
21	Other adjustments to internal loss-absorbing capacity	-
22	Internal loss-absorbing capacity after deductions	156,743
	Risk-weighted amount and exposure measure under the LAC Rules for internal loss-absorbing capacity purposes	
23	Risk-weighted amount under the LAC Rules	658,856
24	Exposure measure under the LAC Rules	1,571,199
	Internal LAC ratios and buffers (%)	
25	Internal LAC risk-weighted ratio	23.8
26	Internal LAC leverage ratio	10.0
27	CET1 capital (as a percentage of RWA under the BCR) available after meeting the LAC consolidation group's minimum capital	
	and LAC requirements	11.8
28	Institution-specific buffer requirement (capital conservation buffer plus countercyclical capital buffer requirements plus higher	
	loss absorbency requirement, expressed as a percentage of RWA under the BCR)	5.645
29	Of which: capital conservation buffer requirement	2.500
30	Of which: institution-specific countercyclical capital buffer requirement	1.645
31	Of which: higher loss absorbency requirement	1.500

Table 15: TLAC2 – Hang Seng Bank Limited creditor ranking

	10. 12.102 Thing string sum 2 minutes strength tuming					
			Creditor ranking (HK\$m)			Sum of values in
		1	1	2	3	columns
		(most junior)	(most junior)		(most senior)	1 to 3
1	Is the resolution entity or a non-HK resolution entity the					
	creditor/investor? (yes or no) ¹	No	Yes	Yes	Yes	
2	Description of creditor ranking	Ordinary	Ordinary	AT1		
		shares ²	shares ²	instruments	LAC loans	
3	Total capital and liabilities net of credit risk mitigation	3,657	6,001	11,744	19,494	40,896
4	Subset of row 3 that is excluded liabilities	-	-	-	-	-
5	Total capital and liabilities less excluded liabilities	3,657	6,001	11,744	19,494	40,896
6	Subset of row 5 that are eligible as internal loss-absorbing capacity	3,657	6,001	11,744	19,494	40,896
7	Subset of row 6 with 1 year ≤ residual maturity < 2 years	-	-	-	-	-
8	Subset of row 6 with 2 years ≤ residual maturity < 5 years	-	-	-	-	-
9	Subset of row 6 with 5 years ≤ residual maturity < 10 years	-	-	-	16,380	16,380
10	Subset of row 6 with residual maturity ≥ 10 years, but excluding					
	perpetual securities	-	-	-	3,114	3,114
11	Subset of row 6 that is perpetual securities	3,657	6,001	11,744	-	21,402

 $^{1 \}quad \textit{Any direct/indirect holdings by the resolution entity is reported as "yes"}.$

² Excludes the value of reserves attributable to ordinary shareholders.

Main features of regulatory capital instruments and non-capital LAC debt instruments

The following is a summary of CET1 capital, AT1 capital and non-capital LAC debt instruments that meet both regulatory capital and LAC requirements, or only LAC (but not regulatory capital) requirements.

Table 16: CCA(A) – Main features of regulatory capital instruments and non-capital LAC debt instruments

(i) In	struments that meet both regulatory capital and LAC requirements	a		
	31 Dec 2019	Quantitative / qualitative information		
As at	. 31 Dec 2017	Ordinary shares		
1	Issuer	Hang Seng Bank Limited		
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	HK0011000095		
3	Governing law(s) of the instrument	Laws of Hong Kong		
3	Means by which enforceability requirement of Section 13 of the TLAC Term Sheet is achieved (for	Laws of Hong Hong		
3a	non-capital LAC debt instruments governed by non-Hong Kong law)	N/A		
	Regulatory treatment			
4	Transitional Basel III rules ¹	N/A		
5	Post-transitional Basel III rules ²	CET1		
6	Eligible at solo / group / solo and group (for regulatory capital purposes)	Solo and Group		
6a	Eligible at solo / LAC consolidation group / solo and LAC consolidation group (for LAC purposes)	Solo and LAC consolidation group		
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares		
8	Amount recognised in regulatory capital (currency in millions, as of most recent reporting date)	HK\$ 9,658 million		
0	Amount recognised in loss-absorbing capacity	11K\$ 7,056 minion		
8a	(currency in millions, as of most recent reporting date)	HK\$ 9,658 million		
9	Par value of instrument	No par value (Total amount HK\$ 9,658 million)		
10	Accounting classification	Shareholders' equity		
11	Original date of issuance	Various		
12	Perpetual or dated	Perpetual		
13	Original maturity date	No maturity		
14	Issuer call subject to prior supervisory approval	N/A		
15	Optional call date, contingent call dates and redemption price	N/A		
16	Subsequent call dates, if applicable	N/A		
	Coupons / dividends			
17	Fixed or floating dividend/coupon	N/A		
18	Coupon rate and any related index	N/A		
19	Existence of a dividend stopper	N/A		
20	Fully discretionary, partially discretionary or mandatory	Fully discretionary		
21	Existence of step up or other incentive to redeem	N/A		
22	Non-cumulative or cumulative	Non-cumulative		
23	Convertible or non-convertible	Non-convertible		
24	If convertible, conversion trigger(s)	N/A		
25	If convertible, fully or partially	N/A		
26	If convertible, conversion rate	N/A		
27	If convertible, mandatory or optional conversion	N/A		
28	If convertible, specify instrument type convertible into	N/A		
29	If convertible, specify issuer of instrument it converts into	N/A		
30	Write-down feature	No		
31	If write-down, write-down trigger(s)	N/A		
32	If write-down, full or partial	N/A		
33	If write-down, permanent or temporary	N/A		
34	If temporary write-down, description of write-up mechanism	N/A		
34a	Type of subordination	Contractual		
	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to	Immediately subordinate to AT1 instruments		
35	instrument in the insolvency creditor hierarchy of the legal entity concerned)	(columns b and c)		
36	Non-compliant transitioned features	No		
37	If yes, specify non-compliant features	N/A		
<u> </u>	V V K V T TT K TT TT TT TT	ļ		

Terms and conditions

Terms and conditions - Ordinary shares

Footnote:

¹ Regulatory treatment of capital instruments subject to transitional arrangements provided for in Schedule 4H to the BCR.

² Regulatory treatment of capital instruments not subject to transitional arrangements provided for in Schedule 4H to the BCR.

³ Subject to FIRO

⁴ Terms and conditions to be read in conjunction with the Master terms and conditions (the "Master terms and conditions")

Master terms and conditions

Terms and conditions

Table 16: CCA(A) – Main features of regulatory capital instruments and non-capital LAC debt instruments (continued)

		b	С
As at	31 Dec 2019		litative information
		Perpetual subordinated loan	Perpetual subordinated loan
		(US\$ 900 million)	(US\$ 600 million)
1	Issuer	Hang Seng Bank Limited	Hang Seng Bank Limited
2	Unique identifier	N/A	N/A
3	Governing law(s) of the instrument	Laws of Hong Kong	Laws of Hong Kong
3a	Means by which enforceability requirement of Section 13 of the TLAC Term Sheet is achieved	N/A	N/A
	Regulatory treatment		
4	Transitional Basel III rules ¹	N/A	N/A
5	Post-transitional Basel III rules ²	AT1	AT1
6	Eligible at solo / group / solo and group	Solo and Group	Solo and Group
6a	Eligible at solo / LAC consolidation group / solo and LAC consolidation group	Solo and LAC consolidation group	Solo and LAC consolidation group
7	Instrument type (types to be specified by each jurisdiction)	Perpetual debt instrument	Perpetual debt instrument
8	Amount recognised in regulatory capital	HK\$ 7,044 million	HK\$ 4,700 million
8a	Amount recognised in loss-absorbing capacity	HK\$ 7,044 million	HK\$ 4,700 million
9	Par value of instrument	US\$ 900 million	US\$ 600 million
10	Accounting classification	Shareholders' equity	Shareholders' equity
11	Original date of issuance	14 June 2019	18 June 2019
12	Perpetual or dated	Perpetual	Perpetual
13	Original maturity date	No maturity	No maturity
14	Issuer call subject to prior supervisory approval	Yes	Yes
15	Optional call date, contingent call dates and redemption price	17 September 2024 at par value	18 June 2024 at par value
13	Optional can date, contingent can dates and redemption price	Callable on any interest payment date	Callable on any interest payment date
16	Subsequent call dates, if applicable	after first call date	after first call date
	Coupons / dividends		
17	Fixed or floating dividend/coupon	Fixed until 17 September 2024 and thereafter floating	Fixed until 18 June 2024 and thereafter floating
18	Coupon rate and any related index	6.030% until 17 September 2024, and thereafter 3-month US\$ LIBOR + 4.020%	6.000% until 18 June 2024, and thereafter 3-month US\$ LIBOR + 4.060%
19	Existence of a dividend stopper	No	No
20	Fully discretionary, partially discretionary or mandatory	Fully discretionary	Fully discretionary
21	Existence of step up or other incentive to redeem	No	No
22	Non-cumulative or cumulative	Non-cumulative	Non-cumulative
23	Convertible or non-convertible	Non-convertible ³	Non-convertible ³
24	If convertible, conversion trigger(s)	N/A	N/A
25	If convertible, fully or partially	N/A	N/A
26	If convertible, conversion rate	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A
30	Write-down feature	Yes	Yes
30	white down reader	Contractual write-down at point of non-viability of borrower. Contractual	Contractual write-down at point of non-viability of borrower. Contractual
31	If write-down, write-down trigger(s)	recognition of HKMA statutory powers under FIRO	recognition of HKMA statutory powers under FIRO
32	If write-down, full or partial	May be written down partially	May be written down partially
33	If write-down, permanent or temporary	Permanent	Permanent
34	If temporary write-down, description of write-up mechanism	N/A	N/A
34a	Type of subordination	Contractual	Contractual
J+a	Position in subordination hierarchy in liquidation		Immediately subordinate to non-capital
35	(specify instrument type immediately senior to instrument in the	LAC debt instruments	LAC debt instruments
55	insolvency creditor hierarchy of the legal entity concerned)	(columns a to d under ii)	(columns a to d under ii)
36	Non-compliant transitioned features	No	No
37	If yes, specify non-compliant features	N/A	N/A
51	In yes, speeny non-compnant reatures	17/11	11/11

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Individual loan agreement4

Table 16: CCA(A) - Main features of regulatory capital instruments and non-capital LAC debt instruments (continued)

(ii) Instruments that meet only LAC (but not regulatory capital) requirements h As at 31 Dec 2019 Quantitative / qualitative information Subordinated loan Subordinated loan (HK\$ 4,680 million) (HK\$ 5,460 million) Hang Seng Bank Limited Hang Seng Bank Limited Issuer Unique identifier N/A N/A Governing law(s) of the instrument Laws of Hong Kong Laws of Hong Kong Means by which enforceability requirement of Section 13 of the TLAC N/A N/A 3а Term Sheet is achieved Regulatory treatment 4 Transitional Basel III rules1 N/A N/A 5 Post-transitional Basel III rules Ineligible Ineligible 6 Eligible at solo / group / solo and group Ineligible Ineligible Eligible at solo / LAC consolidation group / solo and LAC Solo and LAC consolidation group Solo and LAC consolidation group 6a consolidation group Instrument type (types to be specified by each jurisdiction) Non-capital LAC debt instrument Non-capital LAC debt instrument Amount recognised in regulatory capital N/A HK\$ 5,460 million HK\$ 4,680 million Amount recognised in loss-absorbing capacity 8a Par value of instrument HK\$ 5,460 million HK\$ 4,680 million 10 Accounting classification Liability - amortised cost Liability - amortised cost Original date of issuance 30 May 2019 10 June 2019 11 12 Perpetual or dated Dated Dated Interest payment date falling in May Interest payment date falling in June 13 Original maturity date 2028 14 Issuer call subject to prior supervisory approval Yes Yes Interest payment date falling in May Interest payment date falling in June 15 Optional call date, contingent call dates and redemption price 2027 at par value 2028 at par value Callable on any interest payment date Callable on any interest payment date Subsequent call dates, if applicable 16 after first call date after first call date Coupons / dividends 17 Fixed or floating dividend/coupon Floating Floating 3-month HK\$ HIBOR + 1.564% 3-month HK\$ HIBOR + 1.425% Coupon rate and any related index 18 Existence of a dividend stopper 19 No No Mandatory Fully discretionary, partially discretionary or mandatory 20 Mandatory Existence of step up or other incentive to redeem No No Non-cumulative Non-cumulative 22 Non-cumulative or cumulative Convertible or non-convertible 23 Non-convertible³ Non-convertible 24 If convertible, conversion trigger(s) N/A N/A 25 If convertible, fully or partially N/A N/A If convertible, conversion rate N/A 26 N/A If convertible, mandatory or optional conversion N/A N/A 27 28 If convertible, specify instrument type convertible into N/A N/A 29 If convertible, specify issuer of instrument it converts into N/A N/A 30 Write-down feature Yes Yes Contractual write-down at point of Contractual write-down at point of non-viability of borrower. Contractual non-viability of borrower. Contractual 31 If write-down, write-down trigger(s) recognition of HKMA statutory recognition of HKMA statutory powers under FIRO powers under FIRO May be written down partially May be written down partially 32 If write-down, full or partial If write-down, permanent or temporary 33 Permanent Permanent If temporary write-down, description of write-up mechanism 34 N/A N/A Type of subordination Contractual Contractual Immediately subordinate to the claims Immediately subordinate to the claims 35 Position in subordination hierarchy in liquidation of all unsubordinated creditors of all unsubordinated creditors Non-compliant transitioned features Nο No 36 If yes, specify non-compliant features N/A N/A

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Table 16: CCA(A) – Main features of regulatory capital instruments and non-capital LAC debt instruments (continued)

		c	d			
As at	31 Dec 2019	Quantitative / qualitative information				
		Subordinated loan	Subordinated loan			
		(US\$ 400 million)	(HK\$ 6,240 million)			
1	Issuer	Hang Seng Bank Limited	Hang Seng Bank Limited			
2	Unique identifier	N/A	N/A			
3	Governing law(s) of the instrument	Laws of Hong Kong	Laws of Hong Kong			
3a	Means by which enforceability requirement of Section 13 of the TLAC Term Sheet is achieved	N/A	N/A			
	Regulatory treatment					
4	Transitional Basel III rules ¹	N/A	N/A			
5	Post-transitional Basel III rules ²	Ineligible	Ineligible			
6	Eligible at solo / group / solo and group	Ineligible	Ineligible			
ба	Eligible at solo / LAC consolidation group / solo and LAC consolidation group	Solo and LAC consolidation group	Solo and LAC consolidation group			
7	Instrument type (types to be specified by each jurisdiction)	Non-capital LAC debt instrument	Non-capital LAC debt instrument			
8	Amount recognised in regulatory capital	N/A	N/A			
8a	Amount recognised in loss-absorbing capacity	HK\$ 3,114 million	HK\$ 6,240 million			
9	Par value of instrument	US\$ 400 million	HK\$ 6,240 million			
10	Accounting classification	Liability – amortised cost	Liability – amortised cost			
11	Original date of issuance	10 June 2019	13 June 2019			
12	Perpetual or dated	Dated	Dated			
12	Perpetual or dated					
13	Original maturity date	Interest payment date falling in June 2030	Interest payment date falling in June 2026			
14	Issuer call subject to prior supervisory approval	Yes	Yes			
15	Optional call date, contingent call dates and redemption price	Interest payment date falling in June 2029 at par value	Interest payment date falling in June 2025 at par value			
16	Subsequent call dates, if applicable	Callable on any interest payment date after first call date	Callable on any interest payment date after first call date			
	Coupons / dividends					
17	Fixed or floating dividend/coupon	Floating	Floating			
18	Coupon rate and any related index	3-month US\$ LIBOR + 1.789%	3-month HK\$ HIBOR + 1.342%			
19	Existence of a dividend stopper	No	No			
20	Fully discretionary, partially discretionary or mandatory	Mandatory	Mandatory			
21	Existence of step up or other incentive to redeem	No	No			
22	Non-cumulative or cumulative	Non-cumulative	Non-cumulative			
23	Convertible or non-convertible	Non-convertible ³	Non-convertible ³			
24	If convertible, conversion trigger(s)	N/A	N/A			
25	If convertible, fully or partially	N/A	N/A			
26	If convertible, conversion rate	N/A	N/A			
27	If convertible, mandatory or optional conversion	N/A	N/A			
28	If convertible, specify instrument type convertible into	N/A	N/A			
29	If convertible, specify issuer of instrument it converts into	N/A	N/A			
30	Write-down feature	Yes	Yes			
		Contractual write-down at point of non-viability of borrower. Contractual	Contractual write-down at point of non-viability of borrower. Contractual			
31	If write-down, write-down trigger(s)	recognition of HKMA statutory powers under FIRO	recognition of HKMA statutory powers under FIRO			
32	If write-down, full or partial	May be written down partially	May be written down partially			
33	If write-down, permanent or temporary	Permanent	Permanent			
34	If temporary write-down, description of write-up mechanism	N/A	N/A			
34a	Type of subordination	Contractual	Contractual			
35	Position in subordination hierarchy in liquidation	Immediately subordinate to the claims of all unsubordinated creditors	Immediately subordinate to the claims of all unsubordinated creditors			
36	Non-compliant transitioned features	No	No			
37	If yes, specify non-compliant features	N/A	N/A			
51	,, - _F , non-comprisin ressures	1	<u> </u>			

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Credit risk

Credit risk management

Credit risk is the risk that financial loss arises from the failure of a customer or counterparty to meet its obligations under a contract. It arises principally from lending, trade finance, and treasury businesses. The Group has dedicated standards, policies and procedures in place to control and monitor risk from all such activities.

The principal objectives of our credit risk management function are:

- to maintain across the Group a strong culture of responsible lending and a robust credit risk policy and control framework;
- to both partner and challenge our businesses in defining, implementing and continually re-evaluating our credit risk appetite under actual and stress scenario conditions; and
- to ensure there is independent, expert scrutiny of credit risks, their costs and their mitigation.

The credit risk functions within Wholesale Credit and Market Risk and Retail Banking and Wealth Management ("RBWM") Risk are the constituent parts of the Group's Risk functions that support the Group's Chief Risk Officer in overseeing credit risks. Their major duties comprise undertaking independent review of large and high-risk credit proposals, overseeing large exposure policy and reporting on our wholesale and retail credit risk management disciplines, owning our credit policy and credit system programmes, overseeing portfolio management and reporting on risk matters to senior executive management and to regulators.

These credit risk functions work closely with other functions of the Group.

Credit risk operates through a hierarchy of individual credit approval authority limits. With delegation from the Board, Executive Committee delegates the credit approval authority limits to Chief Executive and empowers the Chief Executive to further delegate to Chief Risk Officer and senior management teams on individual basis. Chief Risk Officer is empowered by Chief Executive to further delegate the credit approval authority limits.

Business model/strategy will be reviewed regularly by different business units taking into consideration of current market condition and the Group's risk appetite. Credit risk policies and limits will also be reviewed to align with the direction of defined risk appetite and business strategy.

Credit Risk Management

The Group's exposure to credit risk arises from a wide range of customers and product types. To measure and manage the risk in these exposures, both to distinct customer types or product categories, the Group employs diverse risk rating systems and methodologies: judgmental, analytical, and hybrids of the two.

A fundamental principle of the Group's policy and approach is that analytical risk rating systems and scorecards are decision tools facilitating management, serving ultimately judgemental decisions for which individual approvers are accountable.

For individually assessed customers, the credit process provides for at least annual review of the facility granted. Review may be more frequent, as required by circumstances.

The Group adopts a set of standards that govern the process through which risk rating systems are initially developed, judged fit for purpose, approved and implemented, the conditions under which analytical risk model outcomes can be overridden by approvers; and the process of model performance monitoring and reporting. The framework emphasises on an effective dialogue between business line and risk management, suitable independence of decision takers and a good understanding and robust challenge on the part of senior management.

Analytical risk rating systems are not static and are subject to review and modification in light of the changing environment and the greater availability and quality of data. Processes are established to capture the relevant data for continuous model improvement.

We constantly seek to improve the quality of our risk management. IT systems that process credit risk data continue to be enhanced in order to deliver both comprehensive management information in support of business strategy and solutions to evolving regulatory reporting requirements.

Credit quality of assets

Tables 17 to 21 analyse credit exposures between defaulted and non-defaulted, changes in defaulted loans and debt securities, exposures by geographical locations, by industries and residual maturity on a regulatory consolidation basis. The exposures covered in these tables include loans, debt securities and off-balance sheet exposures. Loans are generally referred to as any on-balance sheet exposures included as credit risk for non-securitisation exposures, covering exposures to customers, banks, sovereigns and others. Cash items and non-financial assets are excluded.

Table 17: CR1 – Credit quality of exposures

		a	b	c	d	e	f	g
					Of which Expec	ted Credit Loss		
					("ECL") accoun	ting provisions ¹		
					for credit los	sses on STC		
		Gross carryin	g amounts of		approach	exposures	Of which ECL	
				-	Allocated in	Allocated in	accounting	
					regulatory	regulatory	provisions for	
			Non-		category of	category of	credit losses on	
		Defaulted	defaulted	Allowances/	specific	collective	IRB approach	Net values
		exposures	exposures	impairments	provisions	provisions	exposures	$(\mathbf{a} + \mathbf{b} - \mathbf{c})$
	As at 31 Dec 2019	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
1	Loans	2,073	1,017,062	3,513	103	273	3,137	1,015,622
2	Debt securities	-	350,535	11	-	-	11	350,524
3	Off-balance sheet exposures	-	520,433	165	-	6	159	520,268
4	Total	2,073	1,888,030	3,689	103	279	3,307	1,886,414

The categorisation of ECL accounting provisions into regulatory category of specific and collective provisions follows the treatment specified in the completion instruction of the HKMA "Capital Adequacy Ratio - (MA(BS)3)" return. According to the completion instruction, the ECL accounting provisions classified into Stage 1 and Stage 2 are treated as collective provisions, while those classified under Stage 3 are treated as specific provisions. Provisions made for purchased or originated credit-impaired financial assets, under which any changes in lifetime expected credit losses will be recognised in the profit and loss account as an impairment gain or loss, are treated as specific provisions.

Table 18: CR2 – Changes in defaulted loans and debt securities

			a
			Amount
		Footnote	HK\$m
1	Defaulted loans and debt securities at end of the previous reporting period (30 Jun 2019)		2,023
2	Loans and debt securities that have defaulted since the last reporting period		733
3	Returned to non-defaulted status		(22)
4	Amounts written off		(625)
5	Other changes	1	(36)
6	Defaulted loans and debt securities at end of the current reporting period (31 Dec 2019)		2,073

Other changes included repayment and foreign exchange movements.

Total		1,890,103
Others	1	176,086
Hong Kong SAR		1,714,017
Food	tnote	HK\$m
		2019
		31 Dec
		amounts at
		Gross carrying
Table 19: CRB1 – Exposures by geographical location	_	

Any geographical segment which constitutes less than 10% of total gross carrying amounts is disclosed on an aggregated basis under the category "Others".

Table 20: CRB2 – Exposures by industry	
	Gross carrying
	amounts at
	31 Dec
	2019
	HK\$m
Industrial, commercial and financial	
- Property development and investment	352,196
- Financial concerns	338,856
- Stockbrokers	3,655
- Wholesale and retail trade	106,602
- Manufacturing	86,144
- Transport and transport equipment	17,948
- Recreational activities	1,132
- Information technology	24,968
- Others	318,140
Individuals	571,034
Trade finance	69,428
Total	1,890,103
Table 21: CRB3 – Exposures by residual maturity	
	Gross carrying
	amounts at
	31 Dec
	2019
	HK\$m
Less than 1 year	801,897
Between 1 and 5 years	508,657
More than 5 years	577,408
Undated	2,141
Total	1,890,103

Impaired exposures, past due unimpaired exposures and renegotiated exposures

Tables 22 to 25 analyse impaired exposures, impairment allowances, past due unimpaired exposures and renegotiated exposures on a regulatory consolidation basis.

Our approach for determining impairment allowances, definitions for accounting purposes of "credit-impaired" and "renegotiated" are explained in note 2(j) of the Group's 2019 Annual Report. The accounting definition of credit impaired and the regulatory definition of default are generally aligned.

The analysis of gross impaired loans and advances and impairment allowances by major industry sectors based on categories and definitions used by the Group is as follows:

Table 22: CRB4 – Impaired exposures and related allowances and write-offs by industry

		Gross loans and advances to customers	Gross impaired loans and advances	Overdue loans and advances ²	Specific provisions ³	Collective provisions ³	Impairment provisions (charged to) / released from profit and loss	Advances written off during the year
As at 31 Dec 2019	Footnote	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
Residential mortgages		271,108	275	105	(11)	(3)	6	-
Real estate		267,898	111	76	(3)	(399)	(181)	-
Others	4	408,803	1,687	997	(800)	(2,297)	(1,510)	939
Total		947,809	2,073	1,178	(814)	(2,699)	(1,685)	939

- 1 The amounts shown in column "Gross loans and advances to customers" represent loans and advances to customers gross of provisions in the financial statements under the regulatory consolidation scope and therefore is different from the "Gross loans and advances to customers" shown in table 26 which is prepared on accounting consolidation basis. The difference of total gross loans of HK\$1,366m represents the Bank's loans and advances to the Group's subsidiaries which are outside the regulatory scope of consolidation.
- 2 The amounts shown in column "Overdue loans and advances" represent gross loans and advances to customers that were overdue for more than 3 months as at 31 December 2019.
- 3 The classification of specific and collective provisions follows the treatment specified in the completion instructions of the HKMA Capital Adequacy Ratio MA(BS)3 return. Details can be found in footnote 1 under table 17 of this document.
- 4 Any segment which constitutes less than 10% of total gross loans and advances to customers is disclosed on an aggregated basis under the category "Others".

The geographical information shown below has been classified by the location of the principal operations of the subsidiary and by the location of the branch responsible for advancing the funds.

Table 23: CRB5 – Impaired exposures and related allowances and write-offs by geographical location

		Gross loans and advances to customers	Gross impaired loans and advances	Overdue loans and advances ²	Specific provisions ³	Collective provisions ³	Impairment provisions (charged to) / released from profit and loss	Advances written off during the year
As at 31 Dec 2019	Footnote	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
Hong Kong SAR		858,051	1,716	844	(551)	(2,300)	(1,533)	837
China		72,081	291	268	(204)	(390)	(152)	102
Others	4	17,677	66	66	(59)	(9)	-	-
Total		947,809	2,073	1,178	(814)	(2,699)	(1,685)	939

- 1 The amounts shown in column "Gross loans and advances to customers" represent loans and advances to customers gross of provisions in the financial statements under the regulatory consolidation scope and therefore is different from the "Gross loans and advances to customers" shown in table 26 which is prepared on accounting consolidation basis. The difference of total gross loans of HK\$1,366m represents the Bank's loans and advances to the Group's subsidiaries which are outside the regulatory scope of consolidation.
- 2 The amounts shown in column "Overdue loans and advances" represent gross loans and advances to customers that were overdue for more than 3 months as at 31 December 2019.
- 3 The classification of specific and collective provisions follows the treatment specified in the completion instructions of the HKMA Capital Adequacy Ratio MA(BS)3 return. Details can be found in footnote 1 under table 17 of this document.
- 4 Any segment which constitutes less than 10% of total gross loans and advances to customers is disclosed on an aggregated basis under the category "Others".

Past due unimpaired exposures are those loans where customers have failed to make payments in accordance with the contractual terms of their facilities. Exposures past due for more than 90 days are considered impaired.

Table 24: CRB6 –			

As at 31 Dec 2019	Up to 29 days HK\$m	30- 59 days HK\$m	60- 89 days HK\$m	Total HK\$m
Loans and advances to customers held at amortised cost:				
- Personal	3,904	387	108	4,399
- Corporate and commercial	3,071	25	51	3,147
- Non-bank financial institutions	-	-	-	-
Total	6,975	412	159	7,546

Table 25: CRB7				

	0	1	1	
				31 Dec
				2019
				HK\$m
Impaired				336
Unimpaired				-
Total	•	•	•	336

Loans and advances to customers

Tables 26 to 28 analyse the loans and advances to customers by geographical locations, by industries, and by which are overdue and rescheduled on an accounting consolidation basis. The accounting consolidation basis is different from the regulatory consolidation basis as explained in the "Basis of consolidation" section of this document.

The following analysis of loans and advances to customers by geographical areas is in accordance with the location of counterparties, after recognised risk transfer.

Table 26: Loans and advances to customers by geographical location

	-	Hong Kong			
		SAR	China	Others	Total
As at 31 Dec 2019	Footnote	HK\$m	HK\$m	HK\$m	HK\$m
Gross loans and advances to customers	1	813,157	108,289	24,997	946,443

¹ The amounts shown in column "Gross loans and advances to customers" represent the loans and advances to customers gross of provisions in the financial statements on the accounting consolidation basis and therefore is different from the "Gross loans and advances to customers" shown in tables 22 and 23 which are prepared under the regulatory consolidation scope. The difference of total gross loans of HK\$1,366m represents the Bank's loans and advances to the Group's subsidiaries which are outside the regulatory scope of consolidation.

The analysis of gross loans and advances to customers by industry sector based on categories and definitions contained in the "Quarterly Analysis of Loans and Advances and Provisions - (MA(BS)2A)" return submitted to the HKMA is as follows:

Table 27: Gross loans and advances to customers by industry sector

	Gross loans and advances	% of gross advances covered by collateral
As at 31 Dec 2019	HK\$m	%
Industrial, commercial and financial sectors		
- property development	72,692	42.5%
- property investment	157,472	87.2%
- financial concerns	7,764	50.4%
- stockbrokers	185	8.1%
- wholesale and retail trade	29,591	56.2%
- manufacturing	23,274	47.1%
- transport and transport equipment	13,891	61.9%
- recreational activities	867	49.7%
- information technology	9,043	7.3%
- other	89,898	74.5%
Individuals		
- loans and advances for the purchase of flats under the		
Government Home Ownership Scheme,		
Private Sector Participation Scheme and		
Tenants Purchase Scheme	30,007	100.0%
- loans and advances for the purchase of other		
residential properties	216,131	100.0%
- credit card loans and advances	29,137	0.0%
- other	30,814	51.5%
Gross loans and advances for use in Hong Kong	710,766	75.7%
Trade finance	33,431	29.9%
Gross loans and advances for use outside Hong Kong	202,246	34.8%
Gross loans and advances to customers	946,443	65.4%

Collateral includes any tangible security that carries a fair market value and is readily marketable. This includes (but is not limited to) cash and deposits, stocks and bonds, mortgages over properties and charges over other fixed assets such as plant and equipment. Where collateral values are greater than gross loans and advances to customers, only the amount of collateral up to the gross loans and advances is included.

Loans and advances to customers that are more than three months overdue and their expression as a percentage of gross loans and advances to customers are as follows:

Table 28: Overdue loans and advances to customers

A - + 21 D - 2010		0/
As at 31 Dec 2019	HK\$m	%
Gross loans and advances which have been overdue with respect to		
either principal or interest for periods of:		
- more than three months but not more than six months	228	0.02%
- more than six months but not more than one year	54	0.01%
- more than one year	896	0.09%
Total	1,178	0.12%
of which:		
- specific provisions	(650)	
- covered portion of overdue loans and advances	356	
- uncovered portion of overdue loans and advances	822	_
- current market value of collateral held against the		
covered portion of overdue loans and advances	759	
Rescheduled loans and advances to customers	117	0.01%

Collateral held with respect to overdue loans and advances is mainly residential properties and commercial properties. The current market value of residential properties and commercial properties were HK\$567m and HK\$175m respectively.

Loans and advances with a specific repayment date are classified as overdue when the principal or interest is overdue and remains unpaid at period-end. Loans and advances repayable by regular instalments are treated as overdue when an instalment payment is overdue and remains unpaid at period-end. Loans and advances repayable on demand are classified as overdue either when a demand for repayment has been served on the borrower but repayment has not been made in accordance with the demand notice, or when the loans and advances have remained continuously outside the approved limit advised to the borrower for more than the overdue period in question.

Rescheduled loans and advances to customers are those loans and advances that have been rescheduled or renegotiated for reasons related to the borrower's financial difficulties. This will normally involve the granting of concessionary terms and resetting the overdue account to non-overdue status. Rescheduled loans and advances to customers are stated net of any advances which have subsequently become overdue for more than three months and which are included in "Overdue loans and advances to customers".

The amount of repossessed assets as at 31 December 2019 was HK\$19m.

Overdue and rescheduled amounts relating to placings with and advances to banks and other assets

There were no impaired, overdue or rescheduled placings with and advances to banks, nor rescheduled other assets as at 31 December 2019.

Off-balance sheet exposures other than derivative transactions

The following table gives the nominal contract amounts and RWA of contingent liabilities and commitments. The information is consistent with that in the "Capital Adequacy Ratio" return required to be submitted to the HKMA by the Group. The return is prepared on a consolidated basis as specified by the HKMA under the requirement of section 3C(1) of the BCR.

For accounting purposes, acceptances and endorsements are recognised on the balance sheet in "Other assets". For the purpose of the BCR, acceptances and endorsements are included in the capital adequacy calculation as if they were contingencies.

Table 29: Off-balance sheet exposures other than derivative transactions	
	31 Dec
	2019
	HK\$m
Contract amounts	
Direct credit substitutes	3,961
Transaction-related contingencies	8,944
Trade-related contingencies	15,784
Commitments that are unconditionally cancellable without prior notice	425,053
Commitments which have an original maturity of not more than one year	5,636
Commitments which have an original maturity of more than one year	61,055
Total	520,433
RWA	50,170

Credit risk under internal ratings-based approach

Qualitative disclosures related to internal models for measuring credit risk under IRB approach

(i) Nature of exposures within each IRB class

The Group uses advanced IRB approach for the majority of its business under the approval granted by the HKMA. This includes the following major classes of non-securitisation exposures:

- Corporate exposures including exposures to global large corporates, local large corporates, middle market corporates and small and medium-sized enterprises ("SME"), non-bank financial institutions and specialised lending.
- Sovereign exposures, including exposures to central governments, central monetary institutions, multilateral development banks and relevant international organisations.
- Bank exposures including exposures to banks and regulated securities firms.
- Retail exposures, including residential mortgages, qualifying revolving retail exposures, other retail exposures and retail SME exposures.
- Equity exposures.
- Other exposures, including cash items and other assets.

At 31 December 2019, the portion of exposure at default ("EAD") and RWA within the Group covered by IRB approach are summarised in the following table. The remaining portions not covered by IRB approach are under STC approach.

Table 30: CRE1 - Percentage of total EAD and RWA covered by IRB approach

	Percentage of total EAD under IRB	Percentage of total RWA under IRB
Portfolio	approach	approach
Corporate exposures (includes SME and other corporates and specialised lending)	93%	87%
Sovereign exposures	100%	100%
Bank exposures (including securities firms)	100%	100%
Residential mortgage loans	90%	83%
Other retail exposures	94%	80%
Equity exposures	100%	100%
Other exposures	100%	100%

The above table covers credit risk for non-securitisation exposures excluding counterparty credit risk. For counterparty credit risk, the percentage of total RWA covered by IRB approach is 83% for corporate exposures and 100% for bank exposures.

(ii) The internal rating system

Exposure to credit risk arises from a very wide range of customers and product types, and the risk rating systems in place to measure and monitor these risks are correspondingly diverse.

Credit risk exposures are generally measured and managed in portfolios of either distinct customer types or product categories. Risk rating systems for the former are designed to assess the default propensity of, and loss severity associated with, customers who are typically managed as individual relationships; these rating systems tend to have a higher subjective content. Risk rating systems for the latter are generally more analytical, applying techniques such as behavioural analysis across product portfolios comprising large numbers of homogeneous transactions.

A fundamental principle of the Group's policy and approach is that analytical risk rating systems and scorecards are decision tools facilitating management, serving ultimately judgmental decisions for which individual approvers are accountable. In the case of automated decision-making processes, accountability rests with those responsible for the parameters built into those processes/systems and the controls surrounding their use. For distinct customers, the credit process requires at least annual review of facility limits granted. Review may be more frequent, as required by circumstances.

Group standards govern the process through which risk rating systems are initially developed, judged fit for purpose, approved and implemented; the conditions under which individual approvers can override analytical risk model outcomes; and the process of model performance monitoring and reporting. There is emphasis on an effective dialogue between business lines and risk management, appropriate independence of decision takers, and a good understanding and robust reflection on the part of senior management.

(iii) Application of IRB parameters

The Group's credit risk rating framework incorporates the probability of default ("PD") of a borrower and the loss severity, expressed in terms of EAD and loss given default ("LGD"). These measures are used to calculate both expected loss ("EL") and capital requirements, subject to any floors required by the HKMA. They are also used in conjunction with other inputs to inform rating assessments for the purpose of credit approval and many other risk management decisions. The narrative explanations that follow relate to the IRB advanced approaches, that is, IRB advanced for distinct customers and retail IRB for the portfolio managed retail business.

Table 31: CRE2 – Wholesale IRB credit risk models

Regulatory asset	Comment	Number of significant		Number of years loss	Regulatory
Central governments and central	PD	models 1	Model description and methodology A shadow rating approach that includes macroeconomic and political factors, constrained with expert judgement.	data >10	Floors No
banks	LGD	1	An unsecured model built on assessment of structural factors that influence the country's long-term economic performance. For unsecured LGD, a floor of 45% is applied.	8	45% ¹
	EAD	1	A cross-classification model that uses both internal data and expert judgement, as well as information on similar exposure types from other asset classes.	8	EAD must be at least equal to the current utilisation of the balance at account level
Bank / Securities firm	PD	2	Statistical models that combine quantitative analysis on financial information with expert inputs and macroeconomic factors.	10	0.03%
	LGD	1	A quantitative model that produces both downturn and expected LGD. Several securities types are included in the model to recognise collateral in the LGD calculation. For unsecured LGD, a floor of 45% is applied.	10	45% ²
	EAD	1	A quantitative model that assigns CCF taking into account product types and committed/uncommitted indicator to calculate EAD using current utilisation and available headroom.	10	EAD must be at least equal to the current utilisation of the balance at account level
Other Corporate / Small and medium sized corporates ³	PD	12	The corporate models use financial information, macroeconomic information and market-driven data, and is complemented by a qualitative assessment. The Non-Bank Financial Institution ("NBFI") models which are the predominantly statistical models that combines quantitative analysis on financial information with expert inputs.	>=10	0.03%
	LGD	1	Regional statistical models covering all corporates, developed using historical loss/recovery data and various data inputs, including collateral information, facility seniority and customer geography.	>10	No
	EAD	1	Regional statistical models covering all corporates, developed using historical utilisation information and various data inputs, including product type and nature of commitment.	>10	EAD must be at least equal to the current utilisation of the balance at account level

¹ LGD floor exempted for the People's Republic of China and Hong Kong Special Administrative Region

² LGD floor exempted for intra-group entities

³ Excludes specialised lending exposures subject to supervisory slotting approach.

(iii) Application of IRB parameters (continued)

Table 32: CRE3 – Material retail IRB credit risk models

Regulatory asset classes measured	Component	Number of significant models		Number of years loss data	Regulatory Floors
Hong Kong - Hang Seng Personal	PD	1	Statistical model built on internal behavioural data and calibrated to a long-run default rate.	>10	0.03%
Residential Mortgages (Residential mortgage exposures)	LGD	3	1 component based model and 2 historical average models based on estimate of loss incurred over a recovery period derived from historical data with downturn LGD based on the worst observed default rate.	>10	LGD floor of 10% at portfolio level
•	EAD	1	Rule-based calculation based on current balance and estimated incurred interest which continues to be a conservative estimate for EAD.	>10	EAD must at least be equal to current balance
Hong Kong – Hang Seng Credit Cards	PD	1	Statistical model built on internal behavioural data and calibrated to a long-run default rate by segment.	>10	0.03%
(Qualifying revolving retail exposures and	LGD	1	Statistical model based on forecasting the amount of expected future losses with downturn adjustment.	>10	
Other retail exposures to individuals)	EAD	1	Statistical model which derives a credit limit utilization by segment which is used to determine the EAD.	>10	EAD must at least be equal to current balance
Hong Kong – Hang Seng Personal Loans	PD	1	Statistical model built on internal behavioural data and calibrated to a long-run default rate by segment.	>10	PD floor of 0.03%
(Qualifying revolving retail exposures and	LGD	1	Statistical model based on forecasting the amount of expected future losses with downturn adjustment.	> 10	
Other retail exposures to individuals)	EAD	1	EAD derived by different product types. Statistical model which derives a credit conversion factor to determine the proportion of undrawn limit to be added to the balance at observation for revolving nature while rule based calculation based on current balance for non-revolving nature.	>10	EAD must at least be equal to current balance

These measures are used to calculate expected loss and capital requirements. They are also used in conjunction with other inputs to form rating assessments for the purpose of credit approval and for risk management decisions.

PD models are developed using statistical estimation generally based on a minimum of five years of historical data. The modelling approach is typically hybrid. EAD models are also generally developed using at least five years of historical observations and typically adopt one of two approaches:

- Closed-end products without the facility for additional drawdowns, EAD is estimated as the outstanding balance of accounts at the time of observation with predicted interest and fees; or
- EAD for products with the facility for additional drawdowns is estimated as the outstanding balance of accounts at the time of observation plus a credit conversion factor applied to the undrawn portion of the facility.

LGD estimates have more variation, particularly in respect of the time period that is used to quantify economic downturn assumptions. The LGD models for retail exposures are developed based on the Group's internal loss and default experiences including recovery values for different types of collaterals for secured retail exposures such as residential mortgages; for unsecured retail exposures such as qualifying revolving retail exposures, LGD models are developed based on past recovery experiences, account behaviours and repayment ability.

(iv) Model Governance

Model governance is under the oversight of HSBC Group or HSBC Regional Model Oversight Committee ("HSBC Group MOC" or "HSBC Regional MOC"). Wholesale Credit and Markets MOC and Retail Risk ("Local MOCs") are established respectively in the Bank with comparable terms of reference as HSBC Group MOC or HSBC Regional MOC.

Local MOCs meet regularly and report to RMM. They are chaired by the Risk function, and its membership is drawn from Risk, Finance and Businesses. Its primary responsibilities are to oversee the framework for the management of model risk, bring a strategic approach to model-related issues across the Bank, and to oversee the governance of our risk rating models, their consistency, within the regulatory framework. Also, it identifies emerging risks for all aspects of the risk rating system, ensuring that model risk is managed within our risk appetite statement, and formally advises RMM / HSBC Group MOC / HSBC Regional MOC on any material model-related issues.

All new or materially changed IRB capital models require the HKMA and the Prudential Regulation Authority's ("PRA") approval and such models fall directly under the remit of Local MOCs and HSBC Group MOC or HSBC Regional MOC.

The approval of models/model changes is the responsibility of individual approvers. Model Owner/Technical Expert ensures that the model is technically sound, has been developed robustly and follows the relevant modelling policies, standards, internal and regulatory requirements. Whereas the Model User/Steward for the function ensures that the model makes sense to the business or function where it will be used and that the model satisfies the requirements from the business, function and regulators.

Compliance with the HSBC Group and local standards for model development, credit risk models validation and implementation are subject to an independent model review process led by the HSBC Independent Model Review team which is separated from the Risk Analytics functions that are responsible for the development, usage and management of models. The Independent Model Review team provides robust challenge to the modelling approaches used and ensures that the performance of those models is transparent and that their limitations are visible to key stakeholders.

HSBC Group Audit, local Internal Audit, or a comparable independent model review unit also conducts regular reviews of the risk rating model application by credit and business groups.

Table 33.1: CR6 – 0	Tredit risk evno	sures by nort	folio and P	D ranges – for	· IRB annro	ach (Wholesal	e)					
1 abic 55.1. CR0 – C	credit risk expo	sures by port	nono and i	D failges – for	пкъ аррго	acii (Wilolesai						
	a	b	c	d	e	f	g	h	i	j	k	1
	Original	Off- balance		EAD post-credit risk mitigation								
	on-balance sheet gross	sheet	Avorago	("CRM") and post-	Avorogo	Number of	Avorago	Average		RWA		
As at 31 Dec 2019	exposure	pre-CCF	Average CCF	CCF	PD	obligors	LGD	maturity	RWA	density	EL	Provisions^
PD scale	HK\$m	HK\$m	%	HK\$m	%		%	years	HK\$m	%	HK\$m	HK\$m
Sovereign			, ,		, ,		, ,	J		,,,		
0.00 to < 0.15	309,645	-	-	309,645	0.01	40	25.8	1.33	10,602	3	11	
0.15 to < 0.25	-	-	-	-		-						
0.25 to < 0.50	-	-	-	-		-						
0.50 to < 0.75	-	-	-	-		-						
0.75 to < 2.50	-		-	-		-					-	
2.50 to < 10.00	-	-	-	-	-	-	-	-	-	-	-	
10.00 to < 100.00	-	-		-		-		_		_	_	
100.00 (Default)	-	-	-	-		-						
Sub-total	309,645	-	-	309,645	0.01	40	25.8	1.33	10,602	3	11	6
Bank												
0.00 to < 0.15	83,998	38	53.9	84,019	0.04	865	36.4	1.21	9,484	11	12	
0.15 to < 0.25	316	115	51.0	375	0.22	80	44.6	0.60	134	36	-	
0.25 to < 0.50	153	-	-	153	0.37	46	45.0	0.55	79	52	-	
0.50 to < 0.75	101	-	-	101	0.63	19	42.7	0.65	68	67	-	
0.75 to < 2.50	93	431	45.0	286	0.89	13	47.8	0.92	262	92	1	
2.50 to < 10.00	-	-	-	-	-	-	-	-	-	-	-	
10.00 to < 100.00	-	-	-	-	-	-	-	-	-	-	-	
100.00 (Default)	-	-	-	-	-	-	-	-		-	-	
Sub-total	84,661	584	46.7	84,934	0.05	1,023	36.5	1.21	10,027	12	13	4
Corporate – small-a	nd-medium size	d cornorates										
0.00 to < 0.15	7,227	5,058	31.9	8,842	0.09	136	30.4	3.31	1,449	16	2	
0.15 to < 0.25	4,007	2,998	31.7	4,956	0.22	208	28.2	2.48	1,195	24	3	
0.25 to < 0.50	28,943	8,022	34.1	31,682	0.37	338	23.9	2.44	8,448	27	28	
0.50 to < 0.75	30,187	9,536	34.0	33,434	0.63	492	29.0	2.46	13,273	40	61	
0.75 to < 2.50	49,437	17,885	28.5	54,536	1.31	1,338	26.3	2.26	24,939	46	188	
2.50 to < 10.00	8,541	3,798	37.0	9,945	3.94	220	31.5	2.14	7,245	73	119	
10.00 to < 100.00	555	53	22.2	566	12.64	12	21.7	1.63	456	81	16	
100.00 (Default)	222	-		222	100.00	12	44.8	2.75	387	174	82	
Sub-total	129,119	47,350	31.8	144,183	1.21	2,756	27.1	2.41	57,392	40	499	1,061
	İ	·										
Corporate – others	10101			450.035		1.00	44.0		44.400			
0.00 to < 0.15	136,216	65,037	36.5	159,935	0.09	469	44.8	2.38	41,100	26	63	
0.15 to < 0.25	55,833	27,823	33.9	65,264	0.22	321	41.2	2.05	25,106	38	59	
0.25 to < 0.50	49,768	26,384	30.8	57,903	0.37	420	36.3	2.12	25,745	44	78	
0.50 to < 0.75	42,268	23,418	24.7	48,052	0.63	385	36.5	2.04	27,375	57	111	
0.75 to < 2.50	106,898	55,262	22.0	119,047	1.45	1,239	36.9	1.89	89,289	75	623	
2.50 to < 10.00	14,354	9,073	20.0	16,166	3.93	254	40.0	1.52	18,003	111	255	
10.00 to < 100.00 100.00 (Default)	522	115	18.0	543 1,117	10.38	73	40.0 36.4	2.68 1.07	933	172 144	562	
Sub-total	1,117 406,976	207,112	29.5	468,027	100.00 0.93	3,177	40.2	2.11	229,160	49	1,773	2,581
San total	+00,570	407,114	47.3	400,047	0.73	3,177	40.2	4.11	447,100	47	1,113	4,301

14010 33.2. 0100	Credit risk expo	sures by port	tolio and P.	D ranges – for	IKB approa	ach (Retail)						
	a	b	c	d	e	f	g	h	i	j	k	1
		Off-		=								
	Original	balance		EAD								
	on-balance sheet gross	sheet	Average	post CRM and post-	Average	Number	Average	Average		RWA		
As at 31 Dec 2019	exposure	-	CCF	CCF	PD	of obligors	LGD	maturity	RWA	density	EI.	Provision
		•				or obligors		·				
PD scale Retail – qualifying r	HK\$m	HK\$m	% DDDF")	HK\$m	%		%	years	HK\$m	%	HK\$m	HKS
0.00 to < 0.15	10,731	156,362	39.2	72,033	0.07	1,727,700	104.9		3,290	5	52	
.15 to < 0.25	1,962	11,840	45.8	7,390	0.22	174,845	104.5		900	12	17	
.25 to < 0.50	4,651	18,983	33.5	11,008	0.40	206,399	100.7		2,060	19	44	
0.50 to < 0.75	2,142	4,028	51.6	4,220	0.60	59,528	101.8		1,103	26	26	
0.75 to < 2.50 0.50 to < 10.00	7,066	11,560	35.3	11,144	1.44	110,168	98.9		5,470	49	159	
0.00 to < 100.00	4,485 1,671	3,100 427	66.2 154.1	6,537 2,329	4.75 28.65	61,352 20,776	99.1 99.2		7,489 4,688	115 201	308 644	
00.00 (Default)	64		154.1	64	100.00	807	93.9		98	153	53	
Sub-total	32,772	206,300	39.7	114,725	1.17	2,361,575	103.3		25,098	22	1,303	2,2
Dotail masidontial r	,	,		,		, ,						
Retail – residential r 1.00 to < 0.15	nortgage expost 169,285	1,353	100.0	170,638	0.09	52,694	18.0		35,805	21	26	
0.15 to < 0.25	32,789	261	100.0	33,050	0.09	27,676	16.7		6,329	19	10	
0.25 to < 0.50	558	5	100.0	563	0.34	156	13.8		91	16	-	
0.50 to < 0.75	20,073	160	100.0	20,233	0.53	8,958	17.0		3,838	19	18	
0.75 to < 2.50	14,869	117	100.0	14,986	0.94	14,651	16.3		3,155	21	23	
2.50 to < 10.00	4,592	35	100.0	4,627	4.74	3,327	15.7		2,322	50	35	
0.00 to < 100.00	4,018	30	100.0	4,048	16.80	2,927	15.3		3,344	83	104	
00.00 (Default)	218	1,961	100.0	218 248,363	100.00	113	14.5 17.5		371 55,255	170 22	218	
Retail – small busine	ess retail exposu			Í		,			ŕ			
0.00 to < 0.15	2,287	7	100.0	2,294	0.08	957	7.2		34	1	-	
0.15 to < 0.25	517	2	100.0	519	0.19	146	15.9		32	6	-	
0.25 to < 0.50	135	1	100.0	136	0.49	36	17.9		17	13	-	
0.50 to < 0.75	553	-	100.0	553	0.59	172	10.6		50	9	-	
0.75 to < 2.50 0.50 to < 10.00	218 486	2 1	100.0	220 487	1.32 5.60	51 180	18.0 5.6		45	20 8	1 2	
10.00 to < 10.00	- 400		100.0	- 407	3.00	100			- 41	-		
100.00 (Default)	-					-					_	
Sub-total	4,196	13	100.0	4,209	0.88	1,542	9.4		219	5	3	
Other retail exposur	es to individual	g		ĺ		ŕ						
0.00 to < 0.15	3,052	2,713	9.9	3,320	0.08	26,603	14.6		113	3	_	
0.15 to < 0.25	1,764	3,030	16.4	2,260	0.03	23,448	14.5		133	6	1	
0.25 to < 0.50	364	1,333	13.7	546	0.45	12,807	75.4		274	50	2	
0.50 to < 0.75	4,826	9	36.9	4,829	0.56	21,024	63.1		2,277	47	17	
0.75 to < 2.50	4,451	1,460	27.6	4,853	1.55	28,104	50.2		2,940	61	41	
2.50 to < 10.00	3,703	196	30.4	3,763	4.68	24,826	65.5		3,612	96	118	
0.00 to < 100.00	864	32	39.9	877	16.08	7,092	70.2		1,202	137	98	
100.00 (Default)	42	0.552	160	42	100.00	396	67.8		73	174	25	
Sub-total	19,066	8,773	16.2	20,490	2.30	144,300	47.9		10,624	52	302	3
Table 33.3: CR6 – Cr	edit risk evnosu	es by portfoli	o and PD rai	ages – for IRR	annroach (To	otal)						
able 33.3. Cito Ci	cuit risk exposui											
	a	b	c	d	e	f	g	h	i	j	k	1
		Off-										
	Original	balance		EAD								
	on-balance	sheet		post CRM								
	_	exposures	_	and post-	Average			Average		RWA		
As at 31 Dec 2019	exposure		CCF	CCF	PD	of obligors	LGD	maturity*	RWA	density	EL	Provision
	HK\$m	HK\$m	%	HK\$m	%		%	years	HK\$m	%	HK\$m	HK\$
Total (all portfolios)	1,232,837	472,093	34.3	1,394,576	0.69	2,624,915	36.6	1.84	398,377	29	4,122	6,3

^{*} The average maturity is relevant to wholesale portfolios only.
^ Provisions in this table represent the eligible provisions as defined under Division 1, Part 6 of the BCR which include the regulatory reserves for general banking risks and the impairment allowances reported under IRB approach.

Table 34: CR10 – Specialised lending under supervisory slotting criteria approach – other than high-volatility commercial real estate ("HVCRE")

As at 31 Dec	2019	a	b	c	d(i)	d(ii)	d(iii)	d(iv)	d(v)	e	f
]	EAD amou	ınt			
		On-	Off-								
		balance	balance	Supervi-			Commo-	Income-			
		sheet	sheet	sory risk-	Project	Object	dities	producing			Expected
Supervisory		exposure	exposure	weight	finance	finance	finance	real estate			loss
Rating		amount	amount	("SRW")	(" PF ")	(" OF ")	(" CF ")	(" IPRE ")	Total	RWA	amount
Grade	Remaining Maturity	HK\$m	HK\$m	%	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
Strong^	Less than 2.5 years	4,051	246	50%	-	-	-	4,150	4,150	2,075	-
Strong	Less than 2.5 years	2,492	1,052	70%	-	-	-	3,019	3,019	2,114	12
Strong	Equal to or more than 2.5 years	5,705	430	70%	-	-	-	5,878	5,878	4,114	24
Good^	Less than 2.5 years	1,148	48	70%	-	-	-	1,168	1,168	818	5
Good	Less than 2.5 years	3,114	466	90%	-	-	-	3,283	3,283	2,954	26
Good	Equal to or more than 2.5 years	1,711	1,346	90%	-	-	-	2,182	2,182	1,964	17
Satisfactory		151	147	115%	-	-	-	203	203	233	6
Weak		-	-	250%	-	-	-	-	-	-	-
Default		-	-	0%	-	-	-	-	-	-	-
Total		18,372	3,735		-	-	-	19,883	19,883	14,272	90

[^] Use of preferential risk-weights.

Table 35: CR10 – Equity exposures under the simple risk-weight method

As at 31 Dec 2019	a	b	c	d	e
	On-balance sheet exposure amount	Off-balance sheet exposure amount	SRW	EAD amount	RWA
Categories	HK\$m	HK\$m	%	HK\$m	HK\$m
Publicly traded equity exposures	46	-	300%	46	137
All other equity exposures	5,539	-	400%	5,539	22,156
Total	5,585	-		5,585	22,293

Credit risk under standardised approach

The standardised approach is applied where exposures do not qualify for use of an IRB approach and/or where an exemption from IRB has been granted. The standardised approach requires banks to use risk assessments prepared by External Credit Assessment Institutions ("ECAI") to determine the risk weightings applied to rated counterparties.

The Group uses the following ECAIs to calculate its capital adequacy requirements under the STC approach prescribed in the BCR:

- Fitch Ratings
- Moody's Investors Service
- Standard & Poor's Ratings Services

Where exposures have been rated by the above-mentioned ECAIs, they are categorised under the following class of exposures:

- Sovereign exposures
- Public sector entity ("PSE") exposures
- Bank exposures
- Securities firm exposures
- Corporate exposures
- Collective investment scheme ("CIS") exposures

The process used to map ECAIs issuer ratings or ECAIs issue specific ratings in the Group's banking book is consistent with those prescribed in the Part 4 of the BCR.

Ta	ole 36: CR5 – Credit risk exposure	s by asset c	lasses and	by risk wei	ghts – for S	TC approac	h					
	Γ	a	b	c	d	e	f	g	h	ha	i	j
As	at 31 Dec 2019											
												Total credit risk
												exposures amount
	Risk weight	0%	10%	20%	35%	50%	75%	100%	150%	250%	Others	(post CCF and post CRM)
	Risk weight											- /
		HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
1	Exposure class	146										146
1	Sovereign exposures		•	4050	•		-	-	-	-	-	
2	PSE exposures	23,062	•	4,852	•	5	•	•	•	•		27,919
2a	Of which: Domestic PSEs	-	-	697	-	-	-	-	-	-	-	697
2b	Of which: Foreign PSEs	23,062	-	4,155	-	5	-	-	-	-	-	27,222
3	Multilateral development bank											
	exposures	-	-	-	-	-	-	-	-	-	-	-
4	Bank exposures	-	-	35	-	-	-	-	-	-	-	35
5	Securities firm exposures	-	-	-	-	-	-	-	-	-	-	-
6	Corporate exposures	-	-	447	-	-	-	43,812	-	-	-	44,259
7	CIS exposures	-	-	-	-	-	-	-	-	-	-	-
8	Cash items	-	-	-	-	-	-	-	-	-	-	-
9	Exposures in respect of failed											
	delivery on transactions entered											
	into on a basis other than a											
	delivery-versus-payment basis	-	-	-	-	-	-	-	-	-	-	-
10	Regulatory retail exposures	-		-	-	-	4,365		-	-		4,365
11	Residential mortgage loans	-	-	•	25,307	-	660	1,925	-	-		27,892
12	Other exposures which are not past											
	due exposures	-	-	-	-	-	-	5,064	-	-	-	5,064
13	Past due exposures	1		-	-	-	-	28	278	-		307
14	Significant exposures to											
	commercial entities	-	-			-		-	-			-
15	Total	23,209	-	5,334	25,307	5	5,025	50,829	278	-	-	109,987

Credit risk mitigation

The Group's approach when granting credit facilities is on the basis of capacity to repay, rather than primarily rely on credit risk mitigation. Depending on a customer's standing and the type of product, facilities may be provided on unsecured basis. Nevertheless, mitigation of credit risk is an important aspect of effective management and takes in many forms.

The Group's general policy is to promote the use of credit risk mitigation, justified by commercial prudence and good practice as well as capital efficiency. Policies covering the acceptability, structuring, terms, control and valuation with regard to different types of collateral security are established to ensure that they are supported by empirical evidence and continue to fulfil their intended purpose.

Concentration of credit risk exists when changes in geographic, economic or industry factors similarly affect groups of counterparties whose aggregate credit exposure is material in relation to the Group's total exposures. The Group's portfolio of financial instrument is diversified along geographic, industry and product sectors.

Collateral

The Group has implemented guidelines on the acceptability of specific classes of collateral or credit risk mitigation, and determined the valuation parameters. Such parameters are established prudently and are reviewed regularly in light of changing market environment and empirical evidence. Security structures and legal covenants are subject to regular review to ensure that they continue to fulfil their intended purpose and remain in line with local market practice.

While collateral is an important mitigant to credit risk, it is the Group's policy to establish that loans are within the customer's capacity to repay rather than to rely excessively on security. Facilities may be granted on unsecured basis depending on the customer's standing and the type of product. The principal collateral types are as follows:

- in the personal sector, charges over the properties, securities, investment funds and deposits;
- in the commercial and industrial sector, charges over business assets such as properties, stock, debtors, investment funds, deposits and machinery; and
- in the commercial real estate sector, charges over the properties being financed.

Repossessed assets are non-financial assets acquired in exchange for loans in order to achieve an orderly realisation, and are reported in the balance sheet within "Other assets" at the lower of fair value (less costs to sell) and the carrying amount of the loan (net of any impairment allowance). If excess funds arise after the debt has been repaid, they are made available either to repay other secured lenders with lower priority or are returned to the customer. The Group does not generally occupy repossessed properties for its business use.

Collateral held as security for financial assets other than loans and advances is determined by the nature of the instrument. Debt securities, treasury and other eligible bills are generally unsecured.

Credit Risk Mitigation under IRB Approach

The main types of recognised collateral taken by the Group are those as stated in section 80 of the BCR, including (but not limited to) cash on deposit, gold bullion, equities listed in a main index and/or a recognised exchange, collective investment schemes, various recognised debt securities, residential, industrial and commercial property, etc.

The Group's policy provides that netting is only to be applied where it has the legal right to do so. Consistent with the BCR, only bilateral netting arrangements are included for capital adequacy credit risk mitigation calculation.

In terms of the application within IRB approach, credit risk mitigants are considered in two broad categories: first, those which reduce the intrinsic PD of an obligor and therefore operate as adjustments to PD estimation, and second, those which affect estimated recoverability of obligations and require adjustment of LGD. The first includes, for example, full parental or group company guarantees; the second, collateral security of various kinds such as cash, equity, properties, fixed assets such as motor vehicles, plant and machinery, stock and debtors, bank and sovereign guarantees, etc.

Credit Risk Mitigation under STC Approach

As stated in sections 98 and 99 of the BCR, certain guarantees and credit derivative contracts are recognised for credit risk mitigation purposes. The main types of guarantees are from sovereigns, corporate and banks. With corporate guarantees, in order for it to be recognised as a credit risk mitigants, it must have a credit rating of A- or better by Standard & Poor's Ratings Services, Fitch Ratings or a credit rating of A3 or better by Moody's Investors Service.

Table 37: CR3 – Overview of recognised credit risk mitigation

	a	b1	b	d	f
			Exposures		Exposures secured
	Exposures		secured by	Exposures secured	by recognised
	unsecured:	Exposures to be	recognised		
	carrying amount	secured	collateral	guarantees	contracts
As at 31 Dec 2019	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
1 Loans	313,472	702,150	564,918	137,232	-
2 Debt securities	348,361	2,163	-	2,163	-
3 Total	661,833	704,313	564,918	139,395	-
4 of which: Defaulted	633	626	530	96	-

Table 38: CR7 – Effects on RWA of recognised credit derivative contracts used as recognised credit risk mitigation – for IRB approach

	a	b
	Pre-credit	Actual
	derivatives RWA	RWA
As at 31 Dec 2019	HK\$m	HK\$m
1 Corporate – Specialised lending under supervisory slotting criteria approach (project finance)	-	-
2 Corporate – Specialised lending under supervisory slotting criteria approach (object finance)	-	-
3 Corporate – Specialised lending under supervisory slotting criteria approach (commodities finance)	-	-
4 Corporate – Specialised lending under supervisory slotting criteria approach (income-producing real estate)	14,272	14,272
5 Corporate – Specialised lending (high-volatility commercial real estate)	=	-
6 Corporate – Small-and-medium sized corporates	57,392	57,392
7 Corporate – Other corporates	229,160	229,160
8 Sovereigns	8,395	8,395
9 Sovereign foreign public sector entities	-	-
10 Multilateral development banks	2,207	2,207
11 Bank exposures – Banks	9,704	9,704
12 Bank exposures – Securities firms	323	323
13 Bank exposures – Public sector entities (excluding sovereign foreign public sector entities)	-	-
14 Retail – Small business retail exposures	219	219
15 Retail – Residential mortgages to individuals	54,028	54,028
16 Retail – Residential mortgages to property-holding shell companies	1,227	1,227
17 Retail – Qualifying revolving retail exposures	25,098	25,098
18 Retail – Other retail exposures to individuals	10,624	10,624
19 Equity – Equity exposures under market-based approach (simple risk-weight method)	22,293	22,293
20 Equity – Equity exposures under market-based approach (internal models method)	-	-
21 Equity – Equity exposures under PD/LGD approach (publicly traded equity exposures held for		
long-term investment)	-	-
22 Equity – Equity exposures under PD/LGD approach (privately owned equity exposures held for		
long-term investment)	-	-
23 Equity – Equity exposures under PD/LGD approach (other publicly traded equity exposures)	-	-
24 Equity – Equity exposures under PD/LGD approach (other equity exposures)	-	-
25 Equity – Equity exposures associated with equity investments in funds (CIS exposures)	-	-
26 Other – Cash items	3,954	3,954
27 Other – Other items	41,350	41,350
28 Total (under the IRB calculation approaches)	480,246	480,246

There is no effect in RWA, as the Group does not have credit derivative contracts used as recognised credit risk mitigation.

Table 39: CR4 – Credit risk exposures and effects of recognised credit risk mitigation – for STC approach

	1	0	h		d	. 1	f
	l	a	Ü	c	-	e	1
		Exposures	•	Exposures	-		
		and pre	-CRM	and post	-CRM	RWA and R	WA density
		On-balance	Off-balance	On-balance	Off-balance		
As	at 31 Dec 2019	sheet amount	sheet amount	sheet amount	sheet amount	RWA	RWA density
		HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	%
	Exposure classes						
1	Sovereign exposures	-	-	144	2	-	-
2	PSE exposures	27,725	439	27,725	194	973	3
2a	Of which: Domestic PSEs	503	439	503	194	140	20
2b	Of which: Foreign PSEs	27,222	-	27,222	-	833	3
3	Multilateral development bank exposures	-	-	-	-	-	
4	Bank exposures	35	-	35	-	7	20
5	Securities firm exposures	-	-	-	-	-	-
6	Corporate exposures	44,807	22,664	42,208	2,051	43,900	99
7	CIS exposures	-	-	-	-	-	-
8	Cash items	-	-	-	-	-	-
9	Exposures in respect of failed delivery on transactions						
	entered into on a basis other than a delivery-versus-						
	payment basis	-	-	-	-	-	-
10	Regulatory retail exposures	5,037	10,253	4,359	6	3,273	75
11	Residential mortgage loans	27,959	2,101	27,814	78	11,278	40
12	Other exposures which are not past due exposures	10,368	9,148	4,928	136	5,064	100
13	Past due exposures	307	-	307	-	445	145
14	Significant exposures to commercial entities	-	-	-	-		
15	Total	116,238	44,605	107,520	2,467	64,940	59

Remark:

Exposure pre-CCF and pre-CRM is reported under obligor's corresponding exposure class. Where the exposure is covered by a guarantee, the credit protection covered portion of the exposure is reported under the exposure class of credit protection provider in columns (c) & (d).

Model performance

The disclosure covers wholesale and retail models which have been approved by regulators. It validates the PD estimation by comparing the PD estimated by IRB Models against actual default experience. It shows our IRB models are generally conservative.

Table 40.1: CR9 – Back-testing of PD per portfolio – for IRB approach (Wholesale)

					d	e			g	h	1
					•	<u> </u>	Number of ob	oligors 1,2		of which:	Average
		External	External			•				new	historical
		rating	rating	External rating		Arithmetic			Defaulted	defaulted	annual
		equivalent	equivalent	equivalent	Weighted	average PD	Beginning of	End of	obligors in	obligors in	default
Portfolio	PD Range	(S&P)	(Moody's)	(Fitch)	average PD	by obligors	the year	the year	the year	the year	rate
As at 31 Dec 20	019				%	%					%
Sovereign	0.00 to < 0.15	AAA to BBB	Aaa to Baa2	AAA to BBB	0.01	0.02	23	20			-
<u> </u>	0.15 to < 0.25	BBB-	Baa3	BBB-	-	-	-	-	-	-	
<u> </u>	0.25 to < 0.50	BBB-	Baa3	BBB-	-	-	-	-	-	-	
<u>. (</u>	0.50 to < 0.75	BB+ to BB	Ba1 to Ba2	BB+ to BB	-	-	-	-	-	-	-
<u>. (</u>	0.75 to < 2.50	BB- to B+	Ba3 to B2	BB- to B-	-	-	-	-	-	-	-
<u>:</u>	2.50 to < 10.00	B to B-	B2 to Caa1	CCC+ to CCC	-	-	-	-	-	-	-
	10.00 to < 100.00	B- to C	Caa1 to C	CCC to C	-	-	-		-		-
Bank	0.00 to < 0.15	AAA to A-	Aaa to Baa1	AAA to BBB+	0.03	0.06	66	61			-
<u> </u>	0.15 to < 0.25	BBB+	Baa2	BBB	0.22	0.22	5	8	-	-	
<u> </u>	0.25 to < 0.50	BBB	Baa3	BBB-	0.37	0.37	7	4			-
<u> </u>	0.50 to < 0.75	BBB-	Baa3	BBB-	0.63	0.63	3	3			-
<u>. (</u>	0.75 to < 2.50	BB+ to BB-	Ba1 to B1	BB+ to B+	1.04	1.11	7	4	-	-	-
<u>.</u>	2.50 to < 10.00	B+ to B-	B2 to Caa1	B to CCC+	-	-	-	-	-	-	-
	10.00 to < 100.00	CCC+ to C	Caa1 to C	CCC to C	-	-	-	-	-	-	-
small-and-	0.00 to < 0.15	AAA to A-	Aaa to Baa1	AAA to BBB+	0.12	0.12	105	101	-	-	•
medium	0.15 to < 0.25	BBB+	Baa2	BBB	0.22	0.22	260	170	-	-	0.07
sized	0.25 to < 0.50	BBB	Baa3	BBB-	0.37	0.37	278	281	-	-	0.38
corporates	0.50 to < 0.75	BBB-	Baa3	BBB-	0.63	0.63	374	402	-	-	0.10
	0.75 to < 2.50	BB+ to BB-	Ba1 to B1	BB+ to B+	1.39	1.48	1,129	1,161	4	1	0.36
<u>-</u>	2.50 to < 10.00	B+ to B-	B2 to Caa1	B to CCC+	3.68	3.76	186	192	4	-	1.50
	10.00 to < 100.00	CCC+ to C	Caa1 to C	CCC to C	10.00	10.00	6	7	-	-	21.43
Corporate -	0.00 to < 0.15	AAA to A-	Aaa to Baa1	AAA to BBB+	0.09	0.10	243	218	-	-	-
others ³	0.15 to < 0.25	BBB+	Baa2	BBB	0.22	0.22	190	228	-	-	0.14
<u>-</u>	0.25 to < 0.50	BBB	Baa3	BBB-	0.37	0.37	269	276	1	-	0.16
-	0.50 to < 0.75	BBB-	Baa3	BBB-	0.63	0.63	319	300	-		0.41
-	0.75 to < 2.50	BB+ to BB-	Ba1 to B1	BB+ to B+	1.40	1.53	1,056	961	3		1.04
-	2.50 to < 10.00	B+ to B-	B2 to Caa1	B to CCC+	3.79	4.05	168	194	1		1.99
	10.00 to < 100.00	CCC+ to C	Caa1 to C	CCC to C	12.12	11.00	3	8	-	-	12.22

¹ The number of obligors represents the obligor rated by key wholesale IRB models directly.

² The number of obligors on corporate counterparty is being reported at counterparty level, while the number of obligors on Multilateral Development Bank (grouped under Sovereign portfolio) and Bank are being reported at entity level. Sovereigns are reported at country level based on local currency and foreign currency ratings.

³ Specialised lending exposures are excluded.

Table 40.2: CR9 – Back-testing of PD per portfolio – for IRB approach (Retail)

a	b	С	d	e	f		g	h	i
					Number of	obligors		of which:	Average
								new	historical
				Arithmetic			Defaulted	defaulted	annual
		External rating	Weighted		Beginning of		obligors in	obligors in	default
Portfolio	PD Range	equivalent**		by obligors	the year	the year	the year	the year	rate
As at 31 Dec 2019			%	%					%
Retail – QRRE	0.00 to < 0.15		0.07	0.07	1,735,424	1,826,556	691	8	0.04
	0.15 to < 0.25		0.22	0.22	182,320	182,548	184	5	0.11
	0.25 to < 0.50		0.39	0.39	223,962	217,559	375	15	0.18
	0.50 to < 0.75		0.60	0.59	66,140	61,900	212	9	0.36
	0.75 to < 2.50		1.45	1.36	247,161	248,750	1,125	56	0.58
	2.50 to < 10.00		4.72	4.60	81,550	82,847	1,738	62	2.53
	10.00 to < 100.00		28.18	33.53	23,153	23,501	2,505	8	11.76
Retail – residential mortgage	0.00 to < 0.15		0.09	0.10	47,802	53,736	10	-	0.02
exposures	0.15 to < 0.25		0.18	0.17	31,174	28,272	18	-	0.03
	0.25 to < 0.50		0.34	0.34	226	171	-	-	0.09
	0.50 to < 0.75		0.52	0.52	8,306	9,141	8	-	0.21
	0.75 to < 2.50		0.95	0.97	15,347	15,140	13	-	0.23
	2.50 to < 10.00		4.75	4.72	3,356	3,461	17	-	1.14
	10.00 to < 100.00		14.94	14.94	3,048	3,049	58	-	7.89
Retail – small business retail	0.00 to < 0.15		0.08	0.07	1,129	1,111		-	
exposures	0.15 to < 0.25		0.19	0.19	188	166		-	-
	0.25 to < 0.50		0.48	0.48	43	49	-	-	-
	0.50 to < 0.75		0.58	0.56	222	214	-	-	-
	0.75 to < 2.50		1.19	1.19	56	62	-	-	0.13
	2.50 to < 10.00		6.10	6.11	204	220	-	-	0.11
	10.00 to < 100.00		-	-	-	-	-		-
Other retail exposures to	0.00 to < 0.15		0.07	0.08	14,384	14,284	3	-	0.01
individuals	0.15 to < 0.25		0.20	0.20	12,085	11,956	8	-	0.08
	0.25 to < 0.50		0.41	0.39	7,974	8,341	12	-	0.21
	0.50 to < 0.75		0.55	0.52	22,698	22,414	59	4	0.36
	0.75 to < 2.50		1.57	1.61	26,138	25,660	198	24	0.95
	2.50 to < 10.00		4.67	4.90	26,491	26,122	700	81	2.97
	10.00 to < 100.00		15.82	16.60	7,347	7,463	693	21	11.14

^{**} External rating equivalent is not applicable to retail exposures.

Note.

The number of obligors is based on account level information for all retail IRB portfolios.

Counterparty credit risk exposures

Counterparty credit risk management

Counterparty credit risk ("CCR") arises for derivatives and SFTs. It is calculated in both the trading and non-trading books, and is the risk that a counterparty may default before settlement of the transaction. CCR is generated primarily in our wholesale global businesses.

The Bank uses current exposure method to calculate exposure value for CCR RWA. Under the approach, the EAD is calculated as current exposure plus regulatory add-ons.

The PFE measures used for CCR management are calibrated to the 95th percentile. The measures consider volatility, trade maturity and the counterparty legal documentation covering netting and collateral.

Limits for CCR exposures are assigned within the overall credit process. The credit risk function assigns a limit against each counterparty to cover derivatives exposure which may arise as a result of a counterparty default. The magnitude of this limit will depend on the overall risk appetite and type of derivatives trading undertaken with the counterparty.

Credit valuation adjustment

CVA risk is the risk of adverse moves in the credit valuation adjustments taken for expected credit losses on derivative transactions. The Bank uses the standardised approach to calculate the CVA capital charge.

Collateral arrangements

Our policy is to revalue all traded transactions and associated collateral positions on a daily basis. An independent collateral management function manages the collateral process including pledging and receiving collateral and investigating disputes and non-receipts.

Eligible collateral types are controlled under a policy to ensure price transparency, price stability, liquidity, enforceability, independence, reusability and eligibility for regulatory purposes. A valuation "haircut" policy reflects the fact that collateral may fall in value between the date the collateral was called and the date of liquidation or enforcement.

Credit ratings downgrade

A credit rating downgrade clause in a Master Agreement or a credit rating downgrade threshold clause in a Credit Support Annex ("CSA") is designed to trigger an action if the credit rating of the affected party falls below a specified level. These actions may include the requirement to pay or increase collateral, the termination of transactions by the non-affected party or the assignment of transactions by the affected party.

At 31 December 2019, the potential value of the additional collateral pertaining to International Swaps and Derivatives Association ("ISDA") CSA downgrade thresholds that we would need to post with counterparties in the event of a one-notch or two-notch downgrade of our rating was nil.

Wrong-way risk

Wrong-way risk occurs when a counterparty's exposures are adversely correlated with its credit quality.

There are two types of wrong-way risk.

- General wrong-way risk occurs when the probability of counterparty default is positively correlated with general risk factors, for example, where a counterparty is resident and/or incorporated in a higher-risk country and seeks to sell a non-domestic currency in exchange for its home currency.
- Specific wrong-way risk occurs in self-referencing transactions. These are transactions in which exposure is driven by capital or financing instruments issued by the counterparty and occurs where exposure from the Bank's perspective materially increases as the value of the counterparty's capital or financing instruments referenced in the contract decreases. It is the HSBC policy that specific wrong-way transactions are approved on a case-by-case basis.

We use a range of tools to monitor and control wrong-way risk, including requiring the business to obtain prior approval before undertaking wrong-way risk transactions outside pre-agreed guidelines. The Traded Risk functions are responsible for the control and monitoring process within an overarching HSBC framework and limit framework.

Central counterparties

While exchange traded derivatives have been cleared through Central counterparties ("CCP")'s for many years, recent regulatory initiatives designed to reduce systemic risk in the banking system are directing increasing volumes of over-the-counter ("OTC") derivatives to be cleared through CCPs.

A dedicated CCP risk team has been established by the HSBC to manage the interface with CCPs and undertake in-depth due diligence of the unique risks associated with these organisations. This is to address an implication of the regulations that the HSBC's risk will be transferred from being distributed among individual, bilateral counterparties to a significant level of risk concentration on CCPs. The HSBC has developed a risk appetite framework to manage risk accordingly, on an individual CCP and global basis. The Bank has adopted such risk appetite framework with limits allocated to individual CCP.

Table 41: CCR1 – Analysis of counterparty default risk exposures (other than those to CCPs) by approaches

		a	b	c	d	e	f
		Replacement cost ("RC")	PFE	Effective expected positive exposure ("EPE")	Alpha (α) used for computing default risk exposure	Default risk exposure after CRM	RWA
As	at 31 Dec 2019	HK\$m	HK\$m	HK\$m		HK\$m	HK\$m
1	SA-CCR (for derivative contracts)	-	-		1.4	-	-
1a	CEM	2,220	7,763		N/A	9,983	2,439
2	IMM (CCR) approach			-	-	-	-
3	Simple Approach (for SFTs)					-	-
4	Comprehensive Approach (for SFTs)					348	41
5	VaR for SFTs					-	-
6	Total						2,480

Table 42: CCR2 - CVA capital charge

		a	b
		EAD post-CRM	RWA
As	at 31 Dec 2019	HK\$m	HK\$m
	Netting sets for which CVA capital charge is calculated by the advanced CVA method	-	-
1	(i) VaR (after application of multiplication factor if applicable)		-
2	(ii) Stressed VaR (after application of multiplication factor if applicable)		-
3	Netting sets for which CVA capital charge is calculated by the standardised CVA method	9,710	2,256
4	Total	9,710	2,256

Table 43: CCR8 – Exposures to CCPs

			•
		a	b
		Exposure after	
		CRM	RWA
As	at 31 Dec 2019	HK\$m	HK\$m
1	Exposures of the AI as clearing member or client to qualifying CCPs (total)		34
2	Default risk exposures to qualifying CCPs (excluding items disclosed in rows 7 to 10), of which:	1,024	21
3	(i) Over-the-counter ("OTC") derivative transactions	1,024	21
4	(ii) Exchange-traded derivative contracts	-	-
5	(iii) Securities financing transactions	-	-
6	(iv) Netting sets subject to valid cross-product netting agreements	-	-
7	Segregated initial margin		
8	Unsegregated initial margin	170	3
9	Funded default fund contributions	177	10
10	Unfunded default fund contributions	-	-
11	Exposures of the AI as clearing member or client to non-qualifying CCPs (total)		-
12	Default risk exposures to non-qualifying CCPs (excluding items disclosed in rows 17 to 20), of which:	-	-
13	(i) OTC derivative transactions	-	-
14	(ii) Exchange-traded derivative contracts	-	-
15	(iii) Securities financing transactions	-	-
16	(iv) Netting sets subject to valid cross-product netting agreements	-	-
17	Segregated initial margin	-	
18	Unsegregated initial margin	-	-
19	Funded default fund contributions	-	-
20	Unfunded default fund contributions	-	-

Table 44: CCR5 – Composition of collateral for counterparty default risk exposures (including those for contracts or transactions cleared through CCPs)

	a	b	c	d	e	f
		Derivative c	ontracts			SFTs
					Fair value of	
	Fair value of	recognised	Fair va	lue of	recognised	
	collateral	received	posted co	llateral	collateral	Fair value of posted
	Segregated	Unsegregated	Segregated	Unsegregated	received	collateral
As at 31 Dec 2019	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
1 Cash – domestic currency	-	1	-	64	-	-
2 Cash – other currencies	-	369	-	106	1,878	6,810
3 Domestic sovereign debt	-	-	-	-	-	-
4 Other sovereign debt	-	-	-	-	4,894	2,104
5 Government agency debt	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	1,794	-
7 Equity securities	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-
9 Total		370	-	170	8,566	8,914

Counterparty default risk under internal ratings-based approach

Table 45: CCR4 – Counterparty default risk exposures (other than those to CCPs) by portfolio and PD range – for IRB approach

	a	b	c	d	e	f	σ
	EAD post-	U	Number of			1	g
As at 31 Dec 2019	EAD post- CRM	Average PD		Average LGD	Average maturity	DWA	RWA density
		· ·	obligors	_	-		
PD scale Sovereign	HK\$m	%		%	years	HK\$m	%
0.00 to < 0.15							
0.00 to < 0.15 0.15 to < 0.25	-	-	<u>-</u>		-	<u>-</u>	
0.15 to < 0.25 0.25 to < 0.50	-	-	-				•
0.50 to < 0.75	-	-	-		-	<u>-</u>	
0.30 to < 0.73 0.75 to < 2.50	-	-	-		-	-	
2.50 to < 10.00	-	-	-		-	-	
	-	-	-		-	-	
10.00 to < 100.00	-	-	-		-	-	
100.00 (Default)	-	-	-		-	-	•
Sub-total	•	-	-	-	-	-	-
Bank							
0.00 to < 0.15	8,417	0.05	104	34.8	1.60	1,140	14
0.15 to < 0.25	334	0.22	10		0.84	127	38
0.25 to < 0.50	399	0.37	6	45.0	1.01	232	58
0.50 to < 0.75	34	0.63	3		1.00	26	
0.75 to < 2.50	-	-	-		-	-	-
2.50 to < 10.00	4	4.20	1	45.0	1.00	6	149
10.00 to < 100.00				_	-	-	
100.00 (Default)		-	-	-	-	-	
Sub-total	9,188	0.07	124		1.54	1,531	17
Corporates							
0.00 to < 0.15	373	0.08	27	45.8	3.62	132	35
0.15 to < 0.25	56	0.22	12	54.3	1.10	27	49
0.25 to < 0.50	20	0.37	13	50.7	1.03	10	50
0.50 to < 0.75	51	0.63	11	51.9	1.01	34	68
0.75 to < 2.50	423	1.52	51	58.5	1.87	516	122
2.50 to < 10.00	40	3.62	7	53.2	1.19	56	140
10.00 to < 100.00	=	-	-	-	-	-	
100.00 (Default)	-	-	-	-	-	-	
Sub-total Sub-total	963	0.90	121	52.6	2.41	775	80
Retail							
0.00 to < 0.15	-		_	-		_	
0.15 to < 0.25	<u> </u>						
0.15 to < 0.25 0.25 to < 0.50	<u> </u>	<u>-</u>					<u> </u>
0.50 to < 0.75	<u> </u>						
0.75 to < 2.50	<u> </u>	<u> </u>			-	<u> </u>	
2.50 to < 10.00	<u> </u>					<u> </u>	
10.00 to < 100.00	<u> </u>	<u> </u>			-		
100.00 (Default)	<u> </u>	<u> </u>			<u> </u>		
Sub-total	-	<u> </u>	-	<u> </u>		-	
	40 454						
Total (sum of all portfolios)	10,151	0.15	245	37.2	1.62	2,306	23

Note:

Details on the scope of models and percentage of RWA covered by models for each of the regulatory portfolios can be found in the "Credit risk under internal ratings-based approach" section of this document.

The Group has not used IMM(CCR) approach to calculate its default risk exposure.

Co	Counterparty default risk under standardised approach											
Tab	le 46: CCR3 – Counterparty defau	ılt risk expo	sures (othe	r than those	e to CCPs)	by asset cl	lasses and l	by risk wei	ghts – for	STC appro	oach	
	As at 31 Dec 2019	a	b	c	ca	d	e	f	g	ga	h	i
	Risk weight	0%	10%	20%	35%	50%	75%	100%	150%	250%	Others	Total default risk exposure after CRM
		HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
	Exposure class											
1	Sovereign exposures	-	-	-	-	-	-	-	-	-	-	-
2	PSE exposures	-	-	-	-	-	-	-	-	-	-	-
2a	Of which: Domestic PSEs	-	-	-	-	-	-	-	-	-	-	-
2b	Of which: Foreign PSEs	-	-	-	-	-	-	-	-	-	-	-
3	Multilateral development bank											
	exposures	-	-	-	-	-	-	-	-	-	-	-
4	Bank exposures	-	-	-	-	-	-	-	-	-	-	-
5	Securities firm exposures	-	-	-	-	-	-	-	-	-	-	-
6	Corporate exposures	-	-	-	-	-	-	154	-	-	-	154
7	CIS exposures	-	-	-	-	-	-	-	-	-	-	-
8	Regulatory retail exposures	-	-	-	-	-	25	-	-	-	-	25
9	Residential mortgage loans	-	-	-	-	-	-	-	-	-	-	-
10	Other exposures which are not											
	past due exposures	-	-	-	-	-	-	-	-	-	-	-
11	Significant exposures to											
	commercial entities	-	-	-	-	-	-	-	-	-	-	-
12	Total	-	-	-	-	-	25	154	-	-	-	179

Market risk

Overview and governance

Market risk is the risk that movements in market factors, including foreign exchange rates and commodity prices, interest rates, credit spreads and equity prices, will reduce our income or the value of our portfolios.

Exposure to market risk is separated into two portfolios:

- Trading portfolios comprise positions arising from market-making.
- Non-trading portfolios comprise positions that primarily arise from the interest rate management of our retail and commercial banking assets and liabilities, and financial investments measured at fair value through other comprehensive income.

The diagram below illustrates the major trading and non-trading market risk types and market risk measures used to monitor and limit exposures.

	Trading Risk	Non-Trading Risk			
Risk Type	 Foreign exchange & Commodities 	- Structural foreign exchange			
	- Interest rates	- Interest rates			
	- Credit spreads	- Credit spreads			
Risk Measure	VaR / Sensitivity / Stress testing	VaR / Sensitivity / Stress testing			

Where appropriate, the Group applies similar risk management policies and measurement techniques to both trading and non-trading portfolios. The Group's objective is to manage and control market risk exposures in order to optimise return on risk while maintaining a market profile consistent with the established risk appetite.

The nature of the hedging and risk mitigation strategies range from the use of traditional market instruments, such as interest rate swaps, to more sophisticated hedging strategies to address a combination of risk factors arising at portfolio level.

Market risk governance

Market risk is managed and controlled through limits approved by the Group's Chief Risk Officer, noting the support of RMM. These limits are allocated across business lines and to the Group's legal entities, including Hang Seng Bank (China) Limited.

Each major operating entity has an independent market risk management and control function which is responsible for measuring market risk exposures in accordance with the policies defined by Group Risk, and monitoring and reporting these exposures against the prescribed limits on a daily basis. Each operating entity is required to assess the market risks arising on each product in its business and to transfer them to either its Global Markets for management, or to separate books managed under the supervision of the Asset and Liability Management Committee ("ALCO").

Our aim is to ensure that all market risks are consolidated within operations that have the necessary skills, tools, management and governance to manage them. In certain cases where the market risks cannot be fully transferred, we identify the impact of varying scenarios on valuations or on net interest income resulting from any residual risk positions.

The Wholesale Credit and Traded Risk Models Oversight Committee ("WCMR MOC") is a formal governance committee established to provide oversight on model risk management related matters for traded risk models used in the region. The WCMR MOC is responsible for overseeing, monitoring, and escalating model risk management related matters within Traded risk. It supports accountable individual model approvers in the oversight of model risk. The WCMR MOC reports into the Group's RMM, which oversees all risk types at Group level.

Our control of market risk in the trading and non-trading portfolios is based on a policy of restricting trading within a list of permissible instruments authorised for each business lines, of enforcing new product approval procedures, and of restricting trading in the more complex derivative products only to business lines with appropriate levels of product expertise and robust control systems.

Market risk measures

Monitoring and limiting market risk exposures

The Group's objective is to manage and control market risk exposures while maintaining a market profile consistent with the Group's risk appetite. The Group uses a range of tools to monitor and limit market risk exposures including sensitivity analysis, VaR, and stress testing.

Sensitivity analysis

The Group uses sensitivity measures to monitor the market risk positions within each risk type. Sensitivity limits are set for portfolios, products and risk types, with the depth of the market being one of the principal factors in determining the level of limits set.

VaR

VaR is a technique that estimates the potential losses on risk positions as a result of movements in market rates and prices over a specified time horizon and to a given level of confidence. The use of VaR is integrated into market risk management and is calculated for all trading positions regardless of how the Group capitalises those exposures. Where there is no approved internal model, the Group uses the appropriate local rules to capitalise exposures.

In addition, the Group calculates VaR for non-trading portfolios in order to have a complete picture of market risk. Where VaR is not calculated explicitly, the Group uses alternative tools as summarised in the 'Stress testing' section below.

The Group's VaR models derive plausible future scenarios from past series of recorded market rates and prices, taking into account interrelationships between different markets and rates such as interest rates and foreign exchange rates. The models use a mixed approach when applying changes in market rates and prices:

- For equity, credit and foreign exchange risk factors, the potential movements are typically represented on a relative return basis.
- For interest rates, a mixed approach is used. The scenarios applied to volatilities are on a relative return basis, whereas the scenarios applied to interest rate curves are calculated using a hybrid of absolute and relative returns. This approach enables the VaR to smoothly adapt to either low or high interest rate environments.

The Group uses the past two years as the data set in our VaR models, which is updated on a fortnightly basis and these scenarios are then applied to the market baselines and trading positions on a daily basis. The models also incorporate the effect of option features on the underlying exposures.

The valuation approach used in our models values:

- non-linear instruments using a full revaluation approach; and
- linear instruments, such as bonds and swaps, using a sensitivity based approach.

The nature of the VaR models means that an increase in observed market volatility will lead to an increase in VaR even without any changes in the underlying positions.

VaR model limitations

Although a valuable guide to risk, VaR should always be viewed in the context of its limitations. For example:

- the use of historical data as a proxy for estimating future events may not encompass all potential events, particularly those which are extreme in nature:
- the use of a holding period assumes that all positions can be liquidated or the risks offset during that period. This may not fully reflect the market risk arising at times of severe illiquidity, when the holding period may be insufficient to liquidate or hedge all positions fully;
- the use of a 99% confidence level, by definition does not take into account losses that might occur beyond this level of confidence; and
- VaR is calculated on the basis of exposures outstanding at the close of business and therefore does not necessarily reflect intra-day exposures.

Risk not in VaR ("RNIV") framework

The risks not in VaR ('RNIV') framework aims to capture and capitalise material market risks that are not adequately covered in the VaR model.

Risk factors are reviewed on a regular basis and either incorporated directly in the VaR models, where possible, or quantified through either the VaR-based RNIV approach or a stress test approach within the RNIV framework.

Backtesting

The Group routinely validates the accuracy of the VaR models by back-testing both actual and hypothetical profit and loss against the trading VaR numbers. Hypothetical profit and loss excludes non-modelled items such as fees, commissions and revenues of intra-day transactions.

The actual number of profits or losses in excess of VaR over this period can therefore be used to gauge how well the models are performing. VaR backtesting is performed at Group consolidated and solo levels, including entities that do not have local permission to use VaR for regulatory purposes.

Stress testing

Stress testing is an important tool that is integrated into the Group's market risk management tool to evaluate the potential impact on portfolio values of more extreme, although plausible, events or movements in a set of financial variables. In such abnormal scenarios, losses can be much greater than those predicted by VaR modelling.

Stress testing is implemented at the legal entity and the overall Group levels. Scenarios are tailored in order to capture the relevant events or market movements. A scoring framework is in place for management to effectively assess the severity of the potential stress losses and the likelihood of occurrence of the stress scenarios. The risk appetite around potential stress losses for the Group is set and monitored against referral limits.

Market risk reverse stress tests are undertaken based upon the premise that there is a fixed loss. The stress test process identifies which scenarios lead to this loss. The rationale behind the reverse stress test is to understand scenarios which are beyond normal business settings that could have contagion and systemic implications.

The market risk stress testing incorporates the historical and hypothetical events.

Stressed VaR and stress testing, together with reverse stress testing, provide management with insights regarding the "tail risk" beyond VaR for which the Group appetite is limited.

Market risk capital models

There are a number of measures that the Group has permission to use in calculating regulatory capital, which are listed below.

For regulatory purposes, the trading book comprises all positions in financial instruments and commodities that are held with trading intent, which are taken with the intention of benefiting from short-term gains or positions where it can be demonstrated that they hedge positions in the trading book

Positions in the trading book are subject to market risk-based rules, i.e. market risk capital, computed using regulatory approved models. Otherwise, the market risk capital is calculated using the Standardised approach.

VaR

VaR used for regulatory purposes differs from VaR used for management purpose with key differences listed below.

VaR	Regulatory	Management
Scope	Regulatory approval	Broader population of trading and
		banking book positions
Confidence interval	99%	99%
Liquidity horizon	10-day	1-day
Data set	Past 2 years	Past 2 years

Stressed VaR

Stressed VaR is primarily used for regulatory capital purposes and is integrated into the risk management process to ensure prudent capital management. Stressed VaR complements other risk measures by providing the potential losses under stressed market conditions.

Stressed VaR modelling follows the same approach as our VaR risk measure, except for the following:

- potential market movements employed for stressed VaR calculations are based on a continuous one-year period of stress for the trading portfolio;
- it is calculated to a 99% confidence using a 10-day holding period;
- it is based on an actual 10-day holding period, whereas Regulatory VaR is based on a one-day holding period scaled to 10 days.

Using the standard templates as specified by the HKMA, the following tables provide detailed information relating to market risk under STM and IMM approaches.

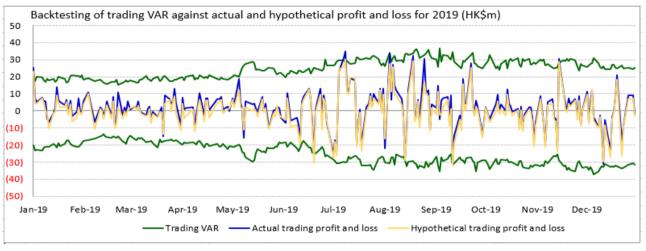
M	arket risk under standardised approach	
Ta	ole 47: MR1 – Market risk under STM approach	
		a
	45.00	RWA
As	at 31 Dec 2019	HK\$m
	Outright product exposures	
1	Interest rate exposures (general and specific risk)	101
2	Equity exposures (general and specific risk)	-
3	Foreign exchange (including gold) exposures	-
4	Commodity exposures	-
	Option exposures	
5	Simplified approach	-
6	Delta-plus approach	-
7	Other approach	-
8	Securitisation exposures	-
9	Total	101

Analysis of VaR, stressed VaR and incremental risk charge measures

Table 48: MR3 – IMM approach values for market risk exposures

	a
	Value
As at 31 Dec 2019	HK\$m
VaR (10 days – one-tailed 99% confidence interval)	· · · · · · · · · · · · · · · · · · ·
1 Maximum Value	117
2 Average Value	80
3 Minimum Value	43
4 Period End	103
Stressed VaR (10 days – one-tailed 99% confidence interval)	
5 Maximum Value	400
6 Average Value	139
7 Minimum Value	56
8 Period End	122
IRC (99.9% confidence interval)	
9 Maximum value	-
10 Average value	-
11 Minimum value	-
12 Period end	-
CRC (99.9% confidence interval)	
13 Maximum value	-
14 Average value	-
15 Minimum value	
16 Period end	
17 Floor	-

Table 49: MR4 – Comparison of VaR estimates with gains or losses



In 2019, there were four profit exceptions and two loss exceptions at the Group consolidated level.

Prudent valuation adjustment

The Group has documented policies and maintains systems and controls for the calculation of Prudent Valuation Adjustment ("PVA"). Prudent value is an estimated conservative pricing with a 90% degree of certainty that would be received to sell an asset or paid to transfer a liability in orderly transactions occurring between market participants at the balance sheet date. The Group's methodology addresses fair value uncertainties arising from a number of sources; market price uncertainty, bid offer ("close out") uncertainty, model risk, concentration, administration cost, unearned credit spreads and investing and funding costs.

Table 50: PV1 – Prudent valuation adjustments

		a	b	c	d	e	f	g	h
								Of which:	Of which:
								In the	In the
			Interest			Commo-		trading	banking
		Equity	rates	FX	Credit	dities	Total	book	book
As a	at 31 Dec 2019	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
1	Close-out uncertainty	43	94	3	1	-	141	16	125
	-for which:								
2	Mid-market value	43	64	3	1	-	111	11	100
3	Close-out costs	-	11	-	-	-	11	4	7
4	Concentration	-	19	-	-	-	19	1	18
5	Early termination	-	-	-	-	-	-	-	-
6	Model risk	-	-	-	-	-	-	-	-
7	Operational risks	4	8	-	-	-	12	2	10
8	Investing and funding costs	-	-	-	-	-	-	-	-
9	Unearned credit spreads	-	2	-	-	-	2	2	-
10	Future administrative costs	-	-	-	-	-	-	-	-
11	Other adjustments	-	-	-	-	-	-	-	-
12	Total adjustments	47	104	3	1	-	155	20	135

Note:

The numbers above represent negative valuation adjustments for assets measured at fair value.

Liquidity information

The following table displays the LCR and NSFR levels on three reporting bases in accordance with rules 10(1)(a), 10(1)(b) and 11(1) of the BLR:

Table 51: LIQA – LCRs and NSFRs on three liquidity reporting bases

	LCR	NSFR
As at 31 Dec 2019	9⁄0	%
Hong Kong Office	213.2	151.3
Unconsolidated	208.2	149.9
Consolidated	205.9	149.1

Information relating to the Group's approach to liquidity risk management, including customised measurement tools and metrics, and details of collateral pools and funding sources is set out in the "Liquidity and funding risk" section on pages 78 to 83 of the Group's 2019 Annual Report. The balance sheet items, broken down into maturity buckets are disclosed in note 21 "Maturity Analysis of assets and liabilities" on the consolidated financial statements in the Group's 2019 Annual Report.

The Group is required to calculate its LCR on a consolidated basis in accordance with rule 11(1) of the BLR and to maintain an LCR of not less than 100% from 1 January 2019.

Table 52: Average liquidity coverage ratio	
	Quarter ended
	31 Dec
	2019
	%
Average liquidity coverage ratio	201.8

In accordance with the BLR, the NSFR was implemented in Hong Kong with effect from 1 January 2018. The Group is required to calculate its NSFR on a consolidated basis and maintain a NSFR of not less than 100%.

The liquidity position and funding position of the Group remained strong and stable in 2019. The average LCR ranged from 198.5% to 210.8% for the reportable quarters.

The composition of the Group's high quality liquid assets ("HQLA") as defined under Schedule 2 of the BLR is shown as below. The majority of the HQLA held by the Group are Level 1 assets which comprise mainly of government debt securities.

Table 53: Total weighted amount of high quality liquid assets	
	Weighted value
	(average) for the
	quarter ended
	31 Dec
	2019
	HK\$m
Level 1 assets	309,019
Level 2A assets	14,257
Level 2B assets	758
Total weighted amount of HQLA	324,034

Sources of funding

Our primary sources of funding are customer deposits. We issue wholesale securities to supplement our customer deposits and change the currency mix or maturity profile of our liabilities.

Currency mismatch

In times of stress it cannot automatically be assumed that one currency can always be converted for another, even if those currencies are "hard" currencies. LCR is therefore assessed by single currency for those that are material. In some currencies, convertibility is restricted by regulators and central banks and this restriction results in local currency not being convertible offshore or even onshore. All operating entities are required to monitor material single currency LCR. Limits are approved and monitored by local ALCO.

Additional contractual obligations

Most of the Group's derivative transactions are exchange rate contracts and interest rate contracts. Under the terms of our current collateral obligations under derivative contracts (which are ISDA compliant CSA contracts), in the event of one-notch and two-notch downgrade in credit ratings, the additional collateral required to post is nil.

A summary of the Group's current policies and practices for the management of liquidity and funding risk is set out in "Liquidity and funding risk" section on pages 78 to 83 of the Group's 2019 Annual Report.

The following table sets out the required disclosure items under the Liquidity Coverage Ratio Standard Disclosure Template as specified by the HKMA. Number of data points used in calculating the average value of the LCR and related components set out in this table for the quarter ended on 31 December 2019 was 75.

Tab	le 54: LIQ1 – Liquidity coverage ratio – for category 1 institution		
		Quarter endec (75 data	
		a	b
		Unweighted	
Bas	is of disclosure: consolidated	value	Weighted value
		(average)	(average)
		HK\$m	HK\$m
A	High quality liquid assets		
1	Total high quality liquid assets ("HQLA")		324,034
В	Cash outflows		
2	Retail deposits and small business funding, of which:	854,053	70,104
3	Stable retail deposits and stable small business funding	218,586	6,557
4	Less stable retail deposits and less stable small business funding	635,467	63,547
4a	Retail term deposits and small business term funding	-	-
5	Unsecured wholesale funding (other than small business funding) and debt securities and		
	prescribed instruments issued by the institution, of which:	276,448	129,010
6	Operational deposits	25,142	5,710
7	Unsecured wholesale funding (other than small business funding) not covered in Row 6	248,928	120,922
8	Debt securities and prescribed instruments issued by the institution and redeemable within		
	the LCR period	2,378	2,378
9	Secured funding transactions (including securities swap transactions)		-
10	Additional requirements, of which:	76,488	10,738
11	Cash outflows arising from derivative contracts and other transactions, and additional		
	liquidity needs arising from related collateral requirements	2,838	2,838
12	Cash outflows arising from obligations under structured financing transactions and		
	repayment of funding obtained from such transactions	882	882
13	Potential drawdown of undrawn committed facilities (including committed credit facilities		
	and committed liquidity facilities)	72,768	7,018
14	Contractual lending obligations (not otherwise covered in Section B) and other contractual cash		
	outflows	18,537	18,537
15	Other contingent funding obligations (whether contractual or non-contractual)	448,025	1,972
16	Total cash outflows		230,361
C	Cash inflows		
17	Secured lending transactions (including securities swap transactions)	3,717	473
18	Secured and unsecured loans (other than secured lending transactions covered in Row 17) and	07.70	53 (00
-10	operational deposits placed at other financial institutions	96,726	53,680
19	Other cash inflows	23,122	14,724
20	Total cash inflows	123,565	68,877
D	Liquidity coverage ratio (adjusted value)		
21	Total HQLA		324,034
22	Total net cash outflows		161,484
23	LCR (%)		201.8%

Table 55: LIQ2 – Net stable funding ratio – for category 1 institution

No. Part P				Quarte	er ended 31 Dec 20	019	
Term to Internation Inte							
Term to maturity on demand < 12 months or or more or more or maturity on demand < 12 months or more	Bas	is of disclosure: consolidated					
Maturity Infiles					6 months to	12 months	Weighted
A. Available Stable funding ("ASF") item							amount
A. Available Stable funding ("ASF") item			HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
Capital:	Δ	Available stable funding ("ASF") item	Πικψιιι	ΠΙΑΨΙΙΙ	πικψιιι	шұш	ΠΙΨΠ
2			157 646				157,646
Minority interests not covered by row 2		*					157,646
3 Other capital instruments			137,040				137,040
Retail deposits and small business funding:			<u> </u>				
Stable deposits		*	<u>-</u>				790,880
6 Less stable deposits 647,454 5 7 Wholesale funding:		1 0	-				208,172
7 Wholesale funding:		^					582,708
Solution			_				163,866
Other wholesale funding		Č			5,567	1//	10,227
10 Liabilities with matching interdependent assets 24,564 31,105 6,652 21,735 12 Net derivative liabilities 8 8 8 8 13 All other funding and liabilities not included in the above categories 24,556 31,105 6,652 21,735 14 Total ASF 24,556 31,105 6,652 21,735 15 Total HQLA for NSFR purposes 358,490					5 297	177	153,639
11 Other liabilities: 24,564 31,105 6,652 21,735 12 Net derivative liabilities not included in the above categories 24,556 31,105 6,652 21,735 13 All toher funding and liabilities not included in the above categories 24,556 31,105 6,652 21,735 14 Total ASF	-	, ,		302,030	3,367	1//	133,039
12 Net derivative liabilities 8		<u> </u>	24 564	31 105	6 652	21 735	25,061
13				31,103	0,032	21,733	23,001
Total ASF			0				
14 Total ASF 1,1 18 Required stable funding ("RSF") item 15 Total HQLA for NSFR purposes 358,490 16 Deposits held at other financial institutions for operational purposes 17 Performing loans and securities: 40,252 270,202 96,867 654,414 60 18 Performing loans to financial institutions secured by Level 1 HQLA 4,865 18 Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing residential mortgage, to non-financial corporate clients, retail and small business customers, sovereigns, the Monetary Authority for the account of the Exchange Fund, central banks and PSEs, of which: 36,533 170,061 74,151 358,162 4 4 4 4 4 4 4 4 4	10		24,556	31,105	6,652	21,735	25,061
B. Required stable funding ("RSF") item 15 Total HQLA for NSFR purposes 358,490	14			,,	,	,	1,137,453
Total HQLA for NSFR purposes 358,490							2,207,100
Deposits held at other financial institutions for operational purposes	_			358.40	90		10,767
purposes 17 Performing loans and securities: 18 Performing loans to financial institutions secured by Level 1 HQLA 1 HQLA 2		~ 1		220,1			10,707
17 Performing loans and securities: 40,252 270,202 96,867 654,414 0	10	•	_	_	_	_	_
18 Performing loans to financial institutions secured by Level 1 HQLA 19 Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions 20 Performing loans, other than performing residential mortgage, to non-financial corporate clients, retail and small business customers, sovereigns, the Monetary Authority for the account of the Exchange Fund, central banks and PSEs, of which: 21 With a risk-weight of less than or equal to 35% under the STC approach 22 Performing residential mortgages, of which: 23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 3,713 30,482 10,474 9,145 25 Assets with matching interdependent liabilities 26 Other assets: 74,491 17,388 38 1,367 27 Physical traded commodities, including gold 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363	17	* *	40 252	270 202	96 867	654 414	680,988
1 HQLA - 4,865 19 Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions 6 57,716 4,477 8,630 20 Performing loans, other than performing residential mortgage, to non-financial corporate clients, retail and small business customers, sovereigns, the Monetary Authority for the account of the Exchange Fund, central banks and PSEs, of which: 21 With a risk-weight of less than or equal to 35% under the STC approach 22 Performing residential mortgages, of which: 23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 25 Assets with matching interdependent liabilities 26 Other assets: 3,713 30,482 10,474 9,145 27 Physical traded commodities, including gold 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 3,363			70,232	270,202	70,007	034,414	000,200
Performing loans to financial institutions secured by non- Level 1 HQLA and unsecured performing loans to financial institutions Performing loans, other than performing residential mortgage, to non-financial corporate clients, retail and small business customers, sovereigns, the Monetary Authority for the account of the Exchange Fund, central banks and PSEs, of which: 36,533 170,061 74,151 358,162 4 With a risk-weight of less than or equal to 35% under the STC approach Performing residential mortgages, of which: With a risk-weight of less than or equal to 35% under the STC approach Securities that are not in default and do not qualify as HQLA, including exchange-traded equities Methods interval and the state of the s	10		_	4 865	_	_	486
Level 1 HQLA and unsecured performing loans to financial institutions 20 Performing loans, other than performing residential mortgage, to non-financial corporate clients, retail and small business customers, sovereigns, the Monetary Authority for the account of the Exchange Fund, central banks and PSEs, of which: 21 With a risk-weight of less than or equal to 35% under the STC approach 22 Performing residential mortgages, of which: 23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 25 Assets with matching interdependent liabilities 26 Other assets: 3,713 30,482 10,474 9,145 27 Physical traded commodities, including gold 3,394 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363	19			,,,,,			700
financial institutions 20 Performing loans, other than performing residential mortgage, to non-financial corporate clients, retail and small business customers, sovereigns, the Monetary Authority for the account of the Exchange Fund, central banks and PSEs, of which: 21 With a risk-weight of less than or equal to 35% under the STC approach 22 Performing residential mortgages, of which: 23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 3,713 30,482 10,474 9,145 25 Assets with matching interdependent liabilities							
20 Performing loans, other than performing residential mortgage, to non-financial corporate clients, retail and small business customers, sovereigns, the Monetary Authority for the account of the Exchange Fund, central banks and PSEs, of which: 21 With a risk-weight of less than or equal to 35% under the STC approach 22 Performing residential mortgages, of which: 23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 25 Assets with matching interdependent liabilities 26 Other assets: 74,491 17,388 38 1,367 27 Physical traded commodities, including gold 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363			6	57,716	4,477	8,630	19,532
mortgage, to non-financial corporate clients, retail and small business customers, sovereigns, the Monetary Authority for the account of the Exchange Fund, central banks and PSEs, of which: 21 With a risk-weight of less than or equal to 35% under the STC approach 22 Performing residential mortgages, of which: 23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 25 Assets with matching interdependent liabilities 26 Other assets: 27 Physical traded commodities, including gold 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 36,533 170,061 74,151 358,162 4 28 4,503 85 2,343 29 20,765 278,477 11 20 21 22 248,278 11 21 25 Assets with matching interdependent liabilities 22 24 248,278 11 23 25 Assets with matching interdependent liabilities 24 26 Other assets: 25 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 36,533 170,061 74,151 358,162 4 36,533 170,061 74,151 358,162 4 37,765 278,477 11 38 30,482 10,474 9,145 11 39,145 11 31,367 11 30,482 10,474 9,145 11 31,367 11 31,368 38 1,367 11 31,368 11 32 21 21 21 21 21 21 21 21 21 21 21 21 21	20	ý .		,		,	
small business customers, sovereigns, the Monetary Authority for the account of the Exchange Fund, central banks and PSEs, of which: 21 With a risk-weight of less than or equal to 35% under the STC approach 22 Performing residential mortgages, of which: 23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 25 Assets with matching interdependent liabilities 26 Other assets: 3,713 30,482 10,474 9,145 27 Physical traded commodities, including gold 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363							
Authority for the account of the Exchange Fund, central banks and PSEs, of which: 21 With a risk-weight of less than or equal to 35% under the STC approach 22 Performing residential mortgages, of which: 23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 25 Assets with matching interdependent liabilities 26 Other assets: 27 Physical traded commodities, including gold 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 36,533 170,061 74,151 358,162 4 4 4 4 528 4,503 85 2,343 27 7,078 7,765 278,477 11 28 29,928 248,278 10 10,474 9,145 25 26 27 28 28 28 28 28 28 28 29,394 28 29 29 20 20 21,363							
21 With a risk-weight of less than or equal to 35% under the STC approach 22 Performing residential mortgages, of which: 23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 25 Assets with matching interdependent liabilities 26 Other assets: 3,713 30,482 10,474 9,145 27 Physical traded commodities, including gold 3,394 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363							
the STC approach 28 4,503 85 2,343 22 Performing residential mortgages, of which: - 7,078 7,765 278,477 II 23 With a risk-weight of less than or equal to 35% under the STC approach - 5,972 5,928 248,278 II 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 3,713 30,482 10,474 9,145 25 Assets with matching interdependent liabilities		banks and PSEs, of which:	36,533	170,061	74,151	358,162	457,117
22 Performing residential mortgages, of which: 23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 25 Assets with matching interdependent liabilities 26 Other assets: 27 Physical traded commodities, including gold 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 37,078 7,765 278,477 10 27,078 7,765 278,477 11 28,972 5,928 248,278 10 10,474 9,145 17,388 38 1,367 17,388 38 1,367	21	With a risk-weight of less than or equal to 35% under					
23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 25 Assets with matching interdependent liabilities 26 Other assets: 74,491 17,388 38 1,367 27 Physical traded commodities, including gold 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363		the STC approach	28	4,503	85	2,343	3,828
23 With a risk-weight of less than or equal to 35% under the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 25 Assets with matching interdependent liabilities 26 Other assets: 27 Physical traded commodities, including gold 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 28 I,363	22	Performing residential mortgages, of which:	-	7,078	7,765	278,477	194,471
the STC approach 24 Securities that are not in default and do not qualify as HQLA, including exchange-traded equities 3,713 30,482 10,474 9,145 25 Assets with matching interdependent liabilities 26 Other assets: 74,491 17,388 38 1,367 27 Physical traded commodities, including gold 9,394 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363	23						_
HQLA, including exchange-traded equities 3,713 30,482 10,474 9,145 25 Assets with matching interdependent liabilities 26 Other assets: 74,491 17,388 38 1,367 27 Physical traded commodities, including gold 9,394 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363		* * *	-	5,972	5,928	248,278	167,331
25 Assets with matching interdependent liabilities	24	Securities that are not in default and do not qualify as					
26 Other assets: 74,491 17,388 38 1,367 27 Physical traded commodities, including gold 9,394 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363		HQLA, including exchange-traded equities	3,713	30,482	10,474	9,145	9,382
27 Physical traded commodities, including gold 9,394 28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363	25	Assets with matching interdependent liabilities	-	-	-	-	
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs 1,363	26	Other assets:	74,491	17,388	38	1,367	67,407
and contributions to default funds of CCPs 1,363	27	Physical traded commodities, including gold	9,394				7,985
	28	Assets posted as initial margin for derivative contracts					
29 Net derivative assets -		and contributions to default funds of CCPs	1,363				1,158
	29	Net derivative assets					-
30 Total derivative liabilities before deduction of variation	30	Total derivative liabilities before deduction of variation					
margin posted 2,610		margin posted	2,610				N/A
		All other assets not included in the above categories	61,124	17,388	38	1,367	58,264
32 Off-balance sheet items 520,492		Off-balance sheet items			520,492		3,655
							762,817
34 Net Stable Funding Ratio (%)	34	Net Stable Funding Ratio (%)					149.1%

Table 55: LIQ2 – Net stable funding ratio – for category 1 institution (continued)

Quarter ended 30 Sep 2019						
Basis of disclosure: consolidated		Unweighted value by residual maturity				
		No specified term to maturity HK\$m	<6 months or repayable on demand HK\$m	6 months to < 12 months HK\$m	12 months or more HK\$m	Weighted amount HK\$m
Α.	Available stable funding ("ASF") item	•	·	·	·	· · · · · · · · · · · · · · · · · · ·
1	Capital:	153,953	-	-	-	153,953
2	Regulatory capital	153,953	-	-	-	153,953
2a	Minority interests not covered by row 2	-	-	-	-	-
3	Other capital instruments	-	-	-	-	-
4	Retail deposits and small business funding:	-	856,326	-	-	781,690
5	Stable deposits		219,917	-	-	208,922
6	Less stable deposits		636,409	-	-	572,768
7	Wholesale funding:	-	373,284	4,729	787	154,874
8	Operational deposits		23,222	-	-	11,611
9	Other wholesale funding	-	350,062	4,729	787	143,263
10	Liabilities with matching interdependent assets	=	-	-	-	-
11	Other liabilities:	22,939	34,773	7,825	21,462	25,374
12	Net derivative liabilities	-				
13	All other funding and liabilities not included in the above	_				
	categories	22,939	34,773	7,825	21,462	25,374
14	Total ASF					1,115,891
B.	Required stable funding ("RSF") item					
15	Total HQLA for NSFR purposes		336,48	38		10,287
16	Deposits held at other financial institutions for operational					
	purposes	-	-	-	-	<u>-</u>
17	Performing loans and securities:	39,341	254,853	107,639	648,113	673,989
18	Performing loans to financial institutions secured by Level I HQLA	-	2,913	-	-	291
19	Performing loans to financial institutions secured by non-					
	Level 1 HQLA and unsecured performing loans to					
	financial institutions	8	69,046	2,927	6,804	18,632
20	Performing loans, other than performing residential mortgage, to non-financial corporate clients, retail and small business customers, sovereigns, the Monetary Authority for the account of the Exchange Fund, central					
	banks and PSEs, of which:	36,099	153,353	85,759	351,427	448,410
21	With a risk-weight of less than or equal to 35% under the STC approach	28	4,473	81	2,649	4,009
22	Performing residential mortgages, of which:		6,818	7,603	280,026	197,049
23	With a risk-weight of less than or equal to 35% under		0,010	7,003	200,020	157,015
	the STC approach	-	5,812	5,748	240,917	162,376
24	Securities that are not in default and do not qualify as					
	HQLA, including exchange-traded equities	3,234	22,723	11,350	9,856	9,607
25	Assets with matching interdependent liabilities	-	-	-	-	-
26	Other assets:	71,440	17,499	37	1,073	63,247
27	Physical traded commodities, including gold	6,679				5,677
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs	1,458				1,239
29	Net derivative assets	466				466
30	Total derivative liabilities before deduction of variation margin posted	3,641				N/A
31	All other assets not included in the above categories	59,196	17,499	37	1,073	55,865
32	Off-balance sheet items		.,	520,813	,	3,655
33	Total RSF					751,178
34	Net Stable Funding Ratio (%)					148.6%

Other disclosures

Interest rate exposures in the banking book

Interest rate risk in the banking book ("IRRBB") is the potential adverse impact of changes in interest rates on earnings and capital. The component of IRRBB that can be economically neutralised in the market is transferred to Balance Sheet Management ("BSM") to manage, in accordance with internal transfer pricing rules. In its management of IRRBB, the group aims to balance mitigating the effect of future interest rate movements which could reduce net interest income against the cost of hedging. The monitoring of the projected net interest income and economic value of equity ("EVE") sensitivity under varying interest rate scenarios is a key part of this.

Governance and structure

The Group's Asset, Liability and Capital Management ("ALCM") monitor and control non-traded interest rate risk. This includes reviewing and challenging the business prior to the release of new products and in respect of proposed behavioural assumptions used for hedging activities. ALCM are also responsible for maintaining and updating the transfer pricing framework, informing the ALCO of the Group's overall banking book interest rate risk exposure and managing the balance sheet in conjunction with BSM.

The ALCO defines each operating entity's transfer pricing curve, reviews and approves the transfer pricing policy, including behaviouralisation assumptions used for products where there is either no defined maturity or customer optionality exists.

The ALCO is also responsible for monitoring and reviewing each entity's overall structural interest rate risk position. Interest rate behaviouralisation policies have to be formulated in line with the HSBC Group's behaviouralisation policies and approved at least annually by local ALCOs. Non-traded assets and liabilities are transferred to BSM based on their repricing and maturity characteristics.

BSM manages the banking book interest rate positions transferred to it within the Market Risk limits approved by RMM.

Sensitivity of economic value of equity

An EVE Sensitivity is the extent to which the EVE will change due to a pre-specified movement in interest rates (six prescribed interest rate shock scenarios as per HKMA), where all other economic variables are held constant. Variations in market interest rates can affect the economic value of assets, liabilities and OBS positions. The economic value of an instrument represents an assessment of the present value of its expected net cash flows, discounted to reflect market rates. The economic value perspective reflects this sensitivity. It provides a more comprehensive view of the potential long-term effects of changes in interest rates.

Sensitivity of net interest income

Net interest income ("NII") Sensitivity is the sensitivity of expected net interest income under varying interest rate scenarios, where all other economic variables are held constant. Sensitivity of net interest income reflects the authorised institution's ("AI") sensitivity of earnings due to changes in market interest rates. Based on the reported interest rate repricing positions in the Interest Rate Risk Return, the impact on an earnings is assessed over the next 12 months if the interest rates change by prescribed interest rate shock scenarios as per HKMA.

The EVE and NII sensitivity shown in the quantitative disclosures are indicative and based on scenarios and assumptions prescribed by HKMA under completion instruction for the Return of Interest Rate Risk in the banking book - (MA(BS)12A), which is completed and reported quarterly on consolidated basis.

Key modelling and parametric assumptions used in calculating ΔEVE and ΔNII in table 56 includes:

- for ΔEVE, commercial margins and other spread components have been excluded from the cash flows used in the computation and discount rate used:
- ii. all the positions captured are assumed to run to maturity and slotted into the appropriate time bands according to the earliest interest repricing date (as per MA(BS)12A) including for non-maturity deposits; and
- iii. no prepayment or early redemption risk assumed as AI does not have material long term fixed rate positions, majority of the loans are on a floating basis and average term for fixed rate deposits is one to three months therefore the risk is immaterial

The Group uses internal measurement system ("IMS")* to generate EVE metric for purposes of internal assessment of capital adequacy which are different from the modelling assumptions prescribed for this disclosure, however they do not contribute to any material directional implications, this includes:

- i. behaviouralisation of non-maturity products, the extent to which can be driven by:
 - a. the amount of the current balance that can be assessed as stable under business-as-usual conditions; and
 - b. for managed rate balances the historic market interest rate re-pricing behaviour observed; or
 - c. for non-interest bearing balances the duration for which the balance is expected to remain under business-as-usual conditions. This assessment is often driven by the reinvestment tenors available to BSM to neutralise the risk through the use of fixed rate government bonds or interest rate derivatives, and for derivatives the availability of cash flow hedging capacity.

- ii. internal measurement consider aggregated results of all currencies and not only material currencies as prescribed by HKMA under completion instruction for the Return of Interest Rate Risk in the banking book (MA(BS)12A);
- iii. negative rate flooring is set at -1% for the overnight tenor to 0% for 20 year tenor unlike the modelling assumptions prescribed under this disclosure which is set at -2% for all currencies; and
- iv. economic value gains weighted 50% and losses weighted 100% under internal measurement unlike modelling assumptions for this disclosure where economic value gains weights 0%.

*IMS follows European Banking Authority ("EBA") EVE methodology which is a group wide metrics for the purpose of internal assessment of capital adequacy.

Average and longest repricing maturity for non-maturity deposits ("NMDs") in 2019 was 1 day.

Table 56: IRRBB1 – Quantitative information on interest rate risk in banking book

	_			
	a	b	С	d
	ΔΕ	VE	ΔN	III
	31 Dec 2019	31 Dec 2018 ¹	31 Dec 2019	31 Dec 2018 ¹
	HK\$m	HK\$m	HK\$m	HK\$m
1 Parallel up	2,828	N/A	(121)	N/A
2 Parallel down	-	N/A	12	N/A
3 Steepener	-	N/A		
4 Flattener	1,579	N/A		
5 Short rate up	2,398	N/A		
6 Short rate down	-	N/A		
7 Maximum	2,828	N/A	12	N/A
Period	31 De	c 2019	31 Dec	20181
8 Tier 1 capital	123	,304	N/	A

¹ The prior period information is not available as the new local IRRBB framework (in accordance with the HKMA Supervisory Policy Manual IR-1) was implemented on 1 July 2019.

The worst scenario for change in the economic value of equity is "Parallel up". The major contributors to the sensitivity is from the net gap positions for HKD, USD, CNY and AUD currencies.

The worst scenario for change in the net interest income over the next twelve months is "Parallel down". The asymmetry between scenarios, 'parallel up' and 'parallel down', is due to flooring at -2% as prescribed by the HKMA.

Mainland activities exposures

The analysis of mainland activities exposures is based on the categories of non-bank counterparties and the type of direct exposures defined by the HKMA "Return of Mainland Activities - (MA(BS)20)". This includes the mainland activities exposures extended by the Bank's Hong Kong offices and its wholly owned banking subsidiary in mainland China.

Table 57: Mainland activities exposures			
	On-balance	Off-balance	
	sheet	sheet	Total
	exposure	exposure	exposures
As at 31 Dec 2019	HK\$m	HK\$m	HK\$m
Type of Counterparties			
1 Central government, central government-owned entities			
and their subsidiaries and joint ventures ("JVs")	51,548	4,794	56,342
2 Local governments, local government-owned entities			
and their subsidiaries and JVs	21,761	4,041	25,802
3 PRC nationals residing in Mainland China or other entities			
incorporated in Mainland China and their subsidiaries and JVs	96,506	25,174	121,680
4 Other entities of central government not reported in item 1 above	9,401	937	10,338
5 Other entities of local governments not reported in item 2 above	3,657	9	3,666
6 PRC nationals residing outside Mainland China or			
entities incorporated outside Mainland China where			
the credit is granted for use in Mainland China	33,996	1,231	35,227
7 Other counterparties where the exposures are considered by	·	•	•
the reporting institution to be non-bank Mainland China exposures	13,528	349	13,877
Total	230,397	36,535	266,932
Total assets after provision	1,532,680		
On-balance sheet exposures as percentage of total assets	15.03%		

On-balance sheet exposures as percentage of total assets remained stable as compared with 30 June 2019.

International claims

The Group's country risk exposures in the table below are prepared in accordance with the HKMA "Return of International Banking Statistics - (MA(BS)21)" guidelines. International claims are on-balance sheet exposures to counterparties based on the location of the counterparties after taking into account the transfer of risk, and represent the sum of cross-border claims in all currencies and local claims in foreign currencies.

The table shows claims on individual countries and territories or areas, after recognised risk transfer, amounting to not less than 10% of the Group's total international claims.

Table 58: International claims						
			Non Bank	Non-Financial		
		Official	Financial	Private		
	Banks	Sector	Institution	Sector	Others	Total
As at 31 Dec 2019	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m	HK\$m
Developed countries	39,796	62,862	16,248	57,475	-	176,381
Offshore centres	10,732	11,680	4,698	120,059	-	147,169
of which: Hong Kong SAR	9,794	865	4,297	101,101	-	116,057
Developing Asia and Pacific	66,265	17,260	15,013	74,726	-	173,264
of which : China	42,419	17,215	13,949	68,026	-	141,609

At 31 December 2019, only claims on Hong Kong SAR and China were the individual countries and territories or areas, which were not less than 10% of the Group's total international claims.

Foreign exchange exposure

The Group's structural foreign exchange exposure, monitored using sensitivity analysis, represents the Group's foreign currency investments in subsidiaries, branches and associates, and the fair value of the Group's long-term foreign currency equity investments, the functional currencies of which are currencies other than the HK dollar. An entity's functional currency is normally that of the primary economic environment in which the entity operates. The Group's structural foreign exchange exposures are managed by the Group's ALCO with the primary objective of ensuring, where practical, that the Group's and the Bank's capital ratios are largely protected from the effect of changes in exchange rates.

Exchange differences on structural exposures are recognised in 'Other comprehensive income'.

The Group's foreign exchange exposures in the table below are prepared in accordance with the HKMA "Return of Foreign Currency Position -(MA(BS)6)".

At 31 December 2019, the USD and RMB were the currencies in which the Group had non-structural foreign currency positions that were not less than 10% of the total net position in all foreign currencies. The Group also had a RMB structural foreign currency position, which was not less than 10% of the total net structural position in all foreign currencies. The net options position is calculated on the basis of delta-weighted positions of all foreign exchange options contracts.

The table below summarise the net structural and non-structural foreign currency positions of the Group.

Table 59: Foreign exchange exposure				
			Other	Total
			foreign	foreign
	USD	RMB	currencies	currencies
As at 31 Dec 2019	HK\$m	HK\$m	HK\$m	HK\$m
Non-structural position				
Spot assets	221,783	128,093	129,478	479,354
Spot liabilities	(219,758)	(129,964)	(73,430)	(423,152)
Forward purchases	408,227	170,930	22,942	602,099
Forward sales	(406,473)	(169,837)	(78,552)	(654,862)
Net options position	-	(80)	142	62
Net long/(short) non-structural position	3,779	(858)	580	3,501
Structural position	-	16,319	1,372	17,691

Other information

Abbreviations

A	
AI	Authorised institution
ALCM	Asset, Liability and Capital Management
ALCO	Asset and Liability Management Committee
ASF	Available stable funding
AT1	Additional tier 1
AUD	Australian dollar
AVAs	Additional valuation adjustments
B	Additional valuation adjustments
Bank	Hang Seng Bank Limited
BCBS	6 6
	Basel Committee on Banking Supervision
BCR	Banking (Capital) Rules
BDR	Banking (Disclosure) Rules
BLR	Banking (Liquidity) Rules
BSC	Basic approach
BSM	Balance Sheet Management
С	
CCF	Credit conversion factor
CCP	Central counterparty
CCR	Counterparty credit risk
CCvB	Countercyclical capital buffer
CEM	Current exposure method
CEM CET1	Common equity tier 1
	Commodities finance
CF	
CIS	Collective investment scheme
CNH	Offshore Chinese Yuan
CNY	Onshore Chinese Yuan
CRC	Comprehensive risk charge
CRM	Credit risk mitigation
CSA	Credit support annex
CVA	Credit valuation adjustment
D	•
D-SIB	Domestic systemically important authorised institution
DTAs	Deferred tax assets
E	
EAD	Exposure at default
EBA	European Banking Authority
ECAI	External Credit Assessment Institution
ECL	Expected Credit Loss
EL	•
	Expected loss
EPE	Expected positive exposure
EVE	Economic value of equity
F	
FBA	Fall-back approach
FIRO	Financial Institutions (Resolution) Ordinance
FSB	Financial Stability Board
FX	Foreign Exchange
G	
G-SIB	Global systemically important authorised institution
Group	Hang Seng Bank Limited together with its subsidiaries
H	<u> </u>
HK\$bn	Billions (thousands of millions) of Hong Kong dollars
HK\$m	Millions of Hong Kong dollars
	Hong Kong dollar
HKD	0 0
HKMA	Hong Kong Monetary Authority
HKFRS	Hong Kong Financial Reporting Standards
	The Hong Kong Special Administrative Region of the
Hong Kong SAR	
	People's Republic of China
HSBC	People's Republic of China HSBC Holdings together with its subsidiary undertakings
	People's Republic of China

I	
IAA	Internal assessment approach
IMM	Internal models approach
IMM(CCR)	Internal models (counterparty credit risk) approach
IMS	Internal measurement system
IPRE	Income-producing real estate
IRB	Internal ratings-based approach
IRC	Incremental risk charge
IRRBB	Interest rate risk in the banking book
ISDA	International Swaps and Derivatives Association
J	
J	Jurisdiction
JVs L	Joint ventures
LAC	Loss-absorbing capacity
LAC Rules	Financial Institutions (Resolution) (Loss-absorbing
	Capacity Requirements - Banking Sector) Rules
LCR	Liquidity coverage ratio
LGD	Loss given default
LR	Leverage ratio
LTA	Look through approach
M	5 11
MBA	Mandate-based approach
MOC	Model Oversight Committee
MSRs	Mortgage servicing rights
N	
N/A	Not applicable
NBFI	Non-Bank Financial Institution
NII	Net interest income
NMD	Non-maturity deposit
NSFR O	Net stable funding ratio
OBS	Off-balance sheet
OF OF	
OTC	Object finance
P	Over-the-counter
PD	Duck chility of default
	Probability of default
PF	Project finance
PFE	Potential future exposure
PRA	Prudential Regulation Authority
PRC	People's Republic of China
PSE	Public sector entity
PVA	Prudent valuation adjustment
PVIF	Present value of in-force long-term insurance business
Q	
QRRE	Qualifying revolving retail exposures
R	
RAS	Risk Appetite Statement
RBWM	Retail Banking and Wealth Management
RC	Replacement cost
RMB	Chinese Renminbi
RMM	Risk Management Meeting
RNIV	Risk not in VaR
RSF	Required stable funding
RW	Risk-weight
RWA	Risk-weighted asset/risk-weighted amount
AWA	Nisk weighted assertisk-weighted amount

S	
SA-CCR	Standardised approach for counterparty credit risk
SEC-ERBA	Securitisation external ratings-based approach
SEC-FBA	Securitisation fall-back approach
SEC-IRBA	Securitisation internal ratings-based approach
SEC-SA	Securitisation standardised approach
SFT	Securities financing transaction
SME	Small and medium-sized enterprises
SRW	Supervisory risk-weight
STC	Standardised (credit risk) approach
STM	Standardised (market risk) approach
T	
T2	Tier 2
TLAC	Total loss-absorbing capacity
U	
USD	US dollar
V	
VaR	Value at risk
W	
WCMR	Wholesale Credit and Market Risk