2022 HSBC Bank Canada Regulatory Capital & Risk Management

Pillar 3 Supplementary Disclosures As at September 30, 2022



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Notes to users

Regulatory Capital and Risk Management Pillar 3 Disclosures

The Office of the Superintendent of Financial Institutions ("OSFI") supervises HSBC Bank Canada (the "Bank") on a consolidated basis. OSFI has approved the Bank's application to apply the Advanced Internal Ratings Based ("AIRB") approach to credit risk on our portfolio and the Standardized Approach for measuring Operational Risk. Please refer to the Annual Report and Accounts 2021 for further information on the Bank's risk and capital management framework. Further information regarding HSBC Group Risk Management Processes can be found in HSBC Holdings plc Capital and Risk Management Pillar 3 Disclosures available on HSBC Group's investor relations web site.

The Pillar 3 Supplemental Disclosures are additional summary descriptions and quantitative financial information which supplement those already made in the Annual Report and Accounts 2021 for the disclosure requirements under OSFI's Pillar 3 Disclosure Requirements Advisory issued September 29, 2006 consistent with the "International Convergence of Capital Measurement and Capital Standards" ('Basel II') issued by the Basel Committee on Banking Supervision (BCBS) in June 2006 and the "Composition of capital disclosure requirements" ('Basel III') issued by the BCBS in June 2012 under OSFI's advisory letter requirements issued in July 2013 and revised in May 2018

The Basel rules are structured around three "pillars":

- Pillar 1 defines the Minimum capital requirements,
- Pillar 2 requires banks to have robust Internal Capital Adequacy Assessment Processes (ICAAP) which will be part of regulators' Supervisory review
- Pillar 3 defines the Market discipline/ disclosures required by Banks which should be consistent and comparable across Banks.

Pillar 3 complements the other two pillars of Basel framework i.e. minimum capital requirements and the supervisory review process. Its aim is to encourage market discipline by developing a set of disclosure requirements which will allow market participants to assess certain specified information on the scope of application of Basel 2/2.5 ('the Basel rules'), capital, particular risk exposures, risk assessment processes, and hence the capital adequacy of the institution.

The supervisory objectives of BCBS are to promote safety and soundness in the financial system and maintain an appropriate level of capital in the system, enhance competitive equality, constitute a more comprehensive approach to addressing risks, and focus on internationally active banks

On June 26, 2012, the BCBS issued the Basel III rules on the information banks must publicly disclose when detailing the composition of their capital, which set out a framework to ensure that the components of banks capital bases are publicly disclosed in standardised formats across and within jurisdictions for banks subject to Basel III.

Basel III builds on Basel II. It also increases the level of risk-weighted assets for significant investments and deferred tax amounts due to temporary timing differences under defined thresholds, exposures to large or unregulated financial institutions meeting specific criteria, exposures to centralized counterparties and exposures that give rise to wrong way risk. In addition Basel III places a greater emphasis on common equity by introducing a new category of capital, Common Equity Tier 1 (CET1), which consists primarily of common shareholders equity net of regulatory adjustments. These regulatory adjustments include goodwill, intangible assets, deferred tax assets, pension assets and investments in financial institutions over certain thresholds. Overall, the Basel III rules increase the level of regulatory deductions relative to Basel II.

On 12 January 2018, OSFI announced its decision to update the existing capital floor for institutions using advanced approaches for credit risk and operational risk. The capital floor of 90%, based on the Basel I capital accord was replaced by a more risk-sensitive capital floor based on the standardized approach under Basel II framework, with floor factor set at 75%.

From Q1 2019, disclosure is based on OSFI's Pillar 3 disclosure requirements (April 2017), including Capital disclosure requirement and Leverage ratio disclosure requirement.

This report is unaudited and all amounts are in rounded millions of Canadian dollars, unless otherwise indicated. Balances reported in this Pillar 3 document reflect the OSFI Capital Adequacy Requirements (CAR) guidelines.

Starting 1 January 2019, counterparty credit risk exposures arising from derivatives are calculated under Standardized Approach for Counterparty Credit Risk (SA-CCR), a new BCBS approach adopted by OSFI. Capital requirements for exposures to Central Counterparties (CCPs) have also been revised. The impact of these changes on credit risk RWA, Credit Valuation Adjustment (CVA) RWA and Leverage Ratio is impactable.

In response to challenges posed by COVID-19 and current market conditions, OSFI announced a number of measures to support the Canadian banks in supplying credit to the economy, maintain stability and public confidence during an expected period of disruption. OSFI lowered the capital floor factor from 75% to 70% effective Q1 2020, which is expected to stay in place until the domestic implementation of the capital floor as part of Basel III reforms in Q2 2023. In addition, transitional arrangement for expected credit loss provisioning have been introduced for a portion of allowances that would otherwise be included in Tier 2 capital to instead be included in Common Equity Tier 1 (CET1) capital. The adjustment is dynamically measured as the increase in Stage 1 and Stage 2 allowances relative to the baseline level as at 31 December 2019, after tax effects and subject to a scaling factor of 70% in 2020, 50% in 2021 and 25% in 2022.

For leverage ratio, central bank reserves and sovereign-issued securities that qualify as High Quality Liquid assets (HQLA) under the Liquidity Adequacy Requirements Guideline can be temporarily excluded from the leverage ratio exposure measure. Starting 1 January 2022, banks are required to include the aforementioned HQLA securities in their leverage ratio exposure measures, as OSFI concluded in August 2021 that the level of uncertainty in the outlook for economic and financial conditions has now reduced. And OSFI announced in Sep 2022 that banks will be required to include central bank reserve in their leverage ratio exposure measures starting 1 April 2023. In Pillar 3 disclosures, banks are expected to separately make available each of the CET1, Tier 1, Total Capital, and Leverage ratios had the transitional arrangement not been applied.

Effective from Q1 2022 filing, OSFI updated the Reporting Manual for Basel Capital Adequacy Reporting (BCAR) with changes in the reporting of Risks not in VaR (RNIV). Banks should apply a similar methodology as is applied in the determination of Stressed VaR, with a multiplier of 3.

Road map to Pillar 3 disclosure requirement

Section	Identifier	Table and templates	Frequency	2021 Annual Report
Capital disclosure	CC1	Composition of Regulatory Capital	Quarterly	
Overview of risk nanagement	OVA	Bank risk management approach	Annually	35-39
	OV1	Overview of RWA	Quarterly	
inkages between inancial	LI1	Differences between accounting and regulatory scopes of consolidation and mapping of financial statements with regulatory risk categories		
etatements and egulatory	LI2	Main sources of differences between regulatory exposure amounts and carrying values in financial statements		
xposures	LIA	Explanations of differences between accounting and regulatory exposure amounts	na ¹	
redit risk	CRA	General information about credit risk	Annually	39-41
	CR1	Credit quality of assets	Semi-annually	47-49
	CR2	Changes in stock of defaulted loans and debt securities	na ¹	
	CRB	Additional disclosure related to the credit quality of assets	Annually	
	CRC	CRC – Qualitative disclosure requirements related to credit risk mitigation techniques	Annually	54-55
	CR3	Credit risk mitigation techniques – overview	Semi-annually	
	CRD	Qualitative disclosures on banks' use of external credit ratings under the standardized approach for credit risk	na ¹	
	CR4	Standardized approach – credit risk exposure and Credit Risk Mitigation (CRM) effects	Semi-annually	
	CR5	Standardized approach – exposures by asset classes and risk weights	Semi-annually	
	CRE	Qualitative disclosures related to IRB models	na ¹	
	CR6	IRB Credit risk exposures by portfolio and PD range	Semi-annually	
	CR7	IRB – Effect on RWA of credit derivatives used as CRM techniques	na ²	
	CR8	RWA flow statements of credit risk exposures under IRB	Quarterly	
	CR9	IRB – Backtesting of probability of default (PD) per portfolio	na ¹	
	CR10	IRB (specialized lending and equities under the simple risk weight method)	Semi-annually	
	CCRA	Qualitative disclosure related to counterparty credit risk	Annually	81-82
ounterparty redit risk	CCR1	Analysis of counterparty credit risk (CCR) exposure by approach	Semi-annually	01-02
rout risk	CCR2	Credit valuation adjustment (CVA) capital charge	Semi-annually	
	CCR2		na ²	
	CCR4	Standardized approach of CCR exposures by regulatory portfolio and risk weights		
		IRB – CCR exposures by portfolio and PD scale	Semi-annually	
	CCR5	Composition of collateral for CCR exposure	Semi-annually	
		Credit derivatives exposures	na ¹	
	CCR7	RWA flow statements of CCR exposures under the Internal Model Method (IMM)	na ²	
	CCR8	Exposures to central counterparties	Semi-annually	
Securitization	SECA	Qualitative disclosure requirements related to securitization exposures		
	SEC1	Securitization exposures in the banking book		
	SEC2	Securitization exposures in the trading book		
	SEC3	Securitization exposures in the banking book and associated regulatory capital requirements – bank acting as originator or as sponsor		
	SEC4	Securitization exposures in the banking book and associated capital requirements – bank acting as investor	na²	
/larket risk	MRA	Qualitative disclosure requirements related to market risk	Annually	
	MRB	Qualitative disclosures for banks using the Internal Models Approach (IMA)	Annually	
	MR1	Market risk under standardised approach	Semi-annually	
	MR2	RWA flow statements of market risk exposures under an IMA	Quarterly	
	MR3	IMA values for trading portfolios	Semi-annually	
	MR4	Comparison of VaR estimates with gains/losses	Semi-annually	
everage Ratio	LR1	Summary comparison of accounting assets vs. leverage ratio exposure measure	Quarterly	
-	LR2	Leverage Ratio Common Disclosure Template	Quarterly	

^{1.} Non D-SIBs are permitted to adopt and disclose any of the above listed tables that are relevant in reflecting the risks and activities of the institution. We assessed accordingly and decided not to adopt this particular table
2. Table does not have any reportable values as at 30th June 2022

		All-in Basis ¹	
		A	t
		30 Sep 2022	30 Jun 2022
	Common Equity Tier 1 capital: instruments and reserves (\$m)		
1	Directly issued qualifying common share capital (and equivalent for non-joint stock companies) plus related stock surplus	1,125	1,125
2	Retained earnings	4,277	4,160
3	Accumulated other comprehensive income (and other reserves)	(766)	(618)
4	Directly issued capital subject to phase out from CET1 (only applicable to non-joint stock companies)	_	
5	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)	4 626	4,667
6	Common Equity Tier 1 capital before regulatory adjustments Common Equity Tier 1 capital: regulatory adjustments (\$m)	4,636	4,007
28	Total regulatory adjustments to Common Equity Tier 1	283	122
29	Common Equity Tier 1 capital (CET1)	4,919	4,789
29a	Common Equity Tier 1 capital (CET1) with transitional arrangements for ECL provisioning not applied	4,902	4,781
250	Additional Tier 1 capital: instruments	.,	.,, .
30	Directly issued qualifying Additional Tier 1 instruments plus related stock surplus	1,100	1,100
31	- of which: classified as equity under applicable accounting standards	1,100	1,100
32	- of which: classified as liabilities under applicable accounting standards		
33	Directly issued capital instruments subject to phase out from Additional Tier 1	_	_
34	Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group AT1)		
35	of which: instruments issued by subsidiaries subject to phase out	_	
36	Additional Tier 1 capital before regulatory adjustments	1,100	1,100
30	Additional Tier 1 capital: regulatory adjustments (\$m)	1,100	1,100
43	Total regulatory adjustments to Additional Tier 1 capital	_	
44	Additional Tier 1 capital (AT1)	1,100	1,100
45	Tier 1 capital (T1 = CET1 + AT1)	6,019	5,889
45a	Tier 1 capital with transitional arrangements for ECL provisioning not applied	6,002	5,881
	Tier 2 capital: instruments and allowances (\$m)		<u> </u>
46	Directly issued qualifying Tier 2 instruments plus related stock surplus	1,000	1,000
47	Directly issued capital instruments subject to phase out from Tier 2	_	_
48	(amount allowed in group Tier 2)	_	_
49	- of which: instruments issued by subsidiaries subject to phase out	_	_
50	Impairment allowances	18	3
51	Tier 2 capital before regulatory adjustments	1,018	1,003
	Tier 2 capital: regulatory adjustments (\$m)		
57	Total regulatory adjustments to Tier 2 capital	_	_
58	Tier 2 capital (T2)	1,018	1,003
59	Total capital (TC = T1 + T2)	7,037	6,892
59a	Total capital with transitional arrangements for ECL provisioning not applied	7,037	6,892
60	Total risk-weighted assets (RWA)	44,481	43,222
61	Common Equity Tier 1 (as percentage of risk-weighted assets)	11.1	11.1
	Common Equity Tier 1 with transitional arrangements for ECL provisioning not applied	11.0	11.1
62	Tier 1 (as percentage of risk-weighted assets)	13.5	13.6
62a	Tier 1 with transitional arrangements for ECL provisioning not applied	13.5	13.6
63	Total capital (as percentage of risk-weighted assets)	15.8	15.9
63a	Total capital with transitional arrangements for ECL provisioning not applied	15.8	15.9
	OSFI all-in target (%)		
69	Common Equity Tier 1 capital all-in target ratio	7.0	7.0
70	Tier 1 capital all-in target ratio	8.5	8.5
71	Total capital all-in target ratio	10.5	10.5
	(only applicable between 1 Jan 2013 and 1 Jan 2022)		
80	Current cap on CET1 instruments subject to phase out arrangements	_	
81	Amounts excluded from CET1 due to cap (excess over cap after redemptions and maturities)	_	
82	Current cap on AT1 instruments subject to phase out arrangements	_	
	Amounts excluded from AT1 due to cap (excess over cap after redemptions and maturities)	_	_
83 84	Current cap on T2 instruments subject to phase out arrangements	_	_

^{1. &}quot;All-in" regulatory capital assumes that all Basel III regulatory adjustments are applied effective January 1, 2013 and that the capital value of instruments which no longer qualify as regulatory capital under Basel III rules will be phased out at a rate of 10% per year from January 1, 2022

Table 2: Overview of Risk Weighted Assets (OV1)

	o 2 : O vol vio v oi viilok v oigittod v loodto (O v i y	-	At	
		30 Sep 2022	30 Jun 2022	30 Sep 2022
		RWA ¹	RWA	Capital requirements ²
		\$m	\$m	\$m
1	Credit risk (excluding counterparty credit risk)	36,285	35,673	2,903
2	- of which Standardized approach (SA) ³	2,222	2,356	178
3	- of which internal rating based (IRB) approach	34,063	33,317	2,725
4	Counterparty credit risk	1,233	862	98
4a	 of which credit valuation adjustment (CVA)⁴ 	354	266	28
5	- of which Standardized approach for counterparty credit risk (SA-CCR)	879	596	70
6	- of which internal model method (IMM)	_	-	_
7	Equity positions in banking book ⁵	9	1	1
8	Equity investments in funds – look-through approach	25	25	2
9	Equity investments in funds – mandate-based approach	_	_	_
10	Equity investments in funds – fall-back approach	_	_	_
11	Settlement risk	_	_	_
12	Securitisation exposures in banking book	_	_	_
13	- of which IRB ratings based approach (RBA)	_	-	_
14	- of which IRB supervisory formula approach (SFA)	_	-	_
15	 of which SA/ simplified supervisory formula approach (SSFA) 	_	-	-
16	Market risk	610	703	49
17	- of which Standardized approach (SA)	133	140	11
18	- of which internal model method (IMM)	477	563	38
19	Operational risk	3,893	3,811	311
20	- of which Basic indicator approach	_	-	-
21	- of which Standardized approach	3,893	3,811	311
22	- of which Advanced measurement approach			_
23	Amounts below the thresholds for deduction (subject to 250% risk weight)			_
24	Floor adjustment ⁶	2,426	2,147	194
25	Total RWA (1+4+7+8+9+10+11+12+16+19+23+24)	44,481	43,222	3,558

Credit Risk

Credit risk is the risk of financial loss if a customer or counterparty fails to meet an obligation under contract. Credit risk arises principally from direct lending, trade finance and the leasing business, but also from other products such as guarantees and credit derivatives.

Table 3: RWA flow statements of credit risk exposures under the IRB approach (CR8)

		RWA ²	Capital requirements ³
		\$m	\$m
1	RWA at the beginning of the period - 1 Jul 2022	33,317	2,665
2	Asset size ¹	928	74
3	Asset quality	(182)	(15)
4	Model updates	_	_
5	Methodology and policy	_	_
6	Acquisitions and disposals	_	_
7	Foreign exchange movements	_	_
8	Other	_	_
9	RWA at the end of the period - 30 Sep 2022	34,063	2,724

Foreign exchange movements are embedded in the asset size

Market Risk

Market Risk is the risk that movements in market factors, such as foreign exchange rates, interest rates, credit spread, equity prices and commodity prices will reduce the value of our portfolios.

RWA includes 6% adjustment to IRB risk-weighted assets for scaling factor
'Capital requirement' represents the minimum total capital charge set at 8% of RWAs by the OSFI Capital Adequacy Requirements (CAR) guidelines

^{3.} Amount includes Other assets not included in standardized or IRB approaches

^{4.} Starting Q1 2019, OSFI has allowed a 0.7 scalar to be applied to the exposure amount determined under SA-CCR for the purpose of calculating CVA

Amount includes banking book equity exposure which are not material and risk weighted @100% in accordance with OSFI CAR guidelines
 The Bank is subject to a regulatory capital floor prescribed by OSFI

RWA includes 6% adjustment to IRB risk-weighted assets for scaling factor 'Capital requirement' represents the minimum total capital charge set at 8% of RWAs under the OSFI CAR guidelines

Table 4: RWA flow statement of market risk exposures under Internal Model Approach (MR2)

		VaR	Stressed VaR	Other	Total RWA
		\$m	\$m	\$m	\$m
1	RWA at the beginning of the period - 1 Jul 2022	158	178	227	563
2	Movement in risk levels ¹	41	21	(148)	(86)
3	Model updates/changes	_	_	_	_
4	Methodology and policy ²	_	_	_	_
8	RWA at the end of the period - 30 Sep 2022	199	199	79	477

^{1.} Movement due to position changes; foreign exchange movements are embedded in the movement in risk levels

Leverage

Table 5 : Summary comparison of accounting assets vs. leverage ratio exposure measure (LR1)

	-	At	
		30 Sep 2022	30 Jun 2022
		\$m	\$m
1	Total consolidated assets as per published financial statements	134,047	125,037
2	Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	_	_
3	Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference	_	
4	Adjustment for fiduciary assets recognised on the balance sheet pursuant to the operative accounting framework but excluded from the leverage ratio exposure measure	_	_
5	Adjustments for derivative financial instruments	(4,421)	(3,182)
6	Adjustment for securities financing transactions (i.e. repurchase agreements and similar secured lending)	15	67
7	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	14,850	14,738
8	Other adjustments ¹	(3,770)	(5,004)
9	Leverage ratio exposure measure	140,721	131,656

^{1.} Effective Q12020, OSFI temporarily allows the exclusion of central bank reserves and sovereign-issued securities that qualify as High Quality Liquid assets (HQLA) from the leverage ratio exposure measure. Starting Q12022, banks will be required to include the aforementioned HQLA securities in their leverage ratio exposure measures, and central bank reserve will be required to include starting Q2 2023. Asset amounts deducted in determining Basel III Tier 1 capital are also included as a deduction.

^{2.} Other included Risks not in VaR (RNIV), OSFI updated the RNIV measure with a similar methodology as applied for Stressed VaR, including a multiplier of 3

Table 6 : Leverage Ratio Common Disclosure Template (LR2)

	·	At	
		30 Sep 2022	30 Jun 2022
		\$m	\$m
	On-balance sheet exposures		
1	On-balance sheet items (excluding derivatives, SFTs and grandfathered securitization exposures but including collateral) ¹	114,924	108,086
2	Gross up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the operative accounting framework (IFRS)	_	
3	(Deductions of receivables assets for cash variation margin provided in derivative transactions)	(882)	(770)
4	(Asset amounts deducted in determining Basel III Tier 1 capital)	272	118
5	Total on-balance sheet exposures (excluding derivatives and SFTs) (Sum of lines 1 to 4)	114,314	107,434
	Derivative exposures		_
6	Replacement cost associated with all derivative transactions (i.e. net of eligible cash variation margin)	1,388	582
7	Add-on amounts for PFE associated with all derivative transactions	1,823	1,842
8	(Exempted CCP-leg of client cleared trade exposures)	-	_
9	Adjusted effective notional amount of written credit derivatives	-	_
10	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	_
11	Total derivative exposures (sum of lines 6 to 10)	3,211	2,424
	Securities financing transaction exposures		
12	Gross SFT assets recognized for accounting purposes (with no recognition of netting), after adjusting for sale accounting transactions	10,180	10,910
13	(Netted amounts of cash payables and cash receivables of gross SFT assets)	(1,849)	(3,917)
14	Counterparty credit risk (CCR) exposure for SFTs	15	67
15	Agent transaction exposures	-	_
16	Total securities financing transaction exposures (sum of lines 12 to 15)	8,346	7,060
	Other off-balance sheet exposures		
17	Off-balance sheet exposure at gross notional amount	52,137	51,324
18	(Adjustments for conversion to credit equivalent amounts)	(37,287)	(36,586)
19	Off-balance sheet items (sum of lines 17 and 18)	14,850	14,738
	Capital and Total Exposures		
20	Tier 1 capital	6,019	5,889
21	Total Exposures (sum of lines 5, 11, 16 and 19)	140,721	131,656
	Leverage Ratios (%)		
22	Leverage ratio	4.3	4.5
22a	Leverage ratio with transitional arrangements for ECL provisioning not applied	4.3	4.5

Effective Q12020, OSFI temporarily allows the exclusion of central bank reserves and sovereign-issued securities that qualify as High Quality Liquid assets (HQLA) from the leverage ratio
exposure measure. Starting Q12022, banks are required to include the aforementioned HQLA securities in their leverage ratio exposure measures, and central bank reserves will be
required to include starting Q22023.

Glossary

- OSFI Office of the Superintendent of Financial Institutions
- \$ Canadian dollar
- **Gross carrying values**: The gross value is the accounting value before any any credit conversion factor (CCF), credit risk mitigation (CRM) techniques or allowance/impairments.
- **Probability of Default (PD)** An estimate of the likelihood of a customer defaulting on any credit related obligation within a 1 year time horizon, expressed as a percentage.
- Loss Given Default (LGD) An estimate of the economic loss, expressed as a percentage (0%-100%) of the exposure at default, that the Bank will incur in the event a borrower defaults
- Exposure At Default (EAD) An estimate of the amount of exposure to a customer at the time of default.
- Standardized Approach for credit risk Under this approach, banks use a standardized set of risk-weights as prescribed by OSFI to calculate credit risk capital requirements. The standardized risk-weights are based on external credit assessments, where available, and other risk-related factors, including exposure asset class, collateral, etc.
- Advanced Internal Ratings Based (AIRB) approach for credit risk Under this approach, banks use their own internal
 historical experience of PD, LGD, EAD and other key risk assumptions to calculate credit risk capital requirements.
- Home Equity Lines of Credit (HELOC) Revolving personal lines of credit secured by home equity.
- SA-CCR The standardised approach (SA-CCR) for measuring exposure at default for counterparty credit risk.
- Credit Value adjustment (CVA) Credit valuation adjustment ('CVA') risk is the risk of adverse moves in the CVAs taken for
 expected credit losses on derivative transactions.
- VaR Value at Risk Value at risk ('VaR') is a technique that estimates the potential losses on risk positions in the trading portfolio as a result of movements in market rates and prices over a specified time horizon and to a given level of confidence.
- All-in regulatory capital assumes that all Basel III regulatory adjustments are applied effective January 1, 2013 and that the capital value of instruments which no longer qualify as regulatory capital under Basel III rules will be phased out at a rate of 10% per year from January 1, 2013 and continuing to January 1, 2022.
- **Transitional regulatory capital** assumes that all Basel III regulatory capital adjustments are phased in from January 1, 2014 to January 1, 2018 and that the capital value of instruments which no longer qualify as regulatory capital under Basel III rules will be phased out at a rate of 10% per year from January 1, 2013 and continuing to January 1, 2022.
- Asset size: organic changes in book size and composition (including origination of new businesses and maturing loans) but excluding changes in book size due to acquisitions and disposal of entities.
- Asset quality: changes in the assessed quality of the bank's assets due to changes in borrower risk, such as rating grade
 migration or similar effects.
- Model updates: changes due to model implementation, changes in model scope, or any changes intended to address model weaknesses.
- Methodology and policy: changes due to methodological changes in calculations driven by regulatory policy changes, including both revisions to existing regulations and new regulations.
- Acquisitions and disposals: changes in book sizes due to acquisitions and disposal of entities.
- ECL: expected credit loss