

Malayan Banking Berhad

Brunei Darussalam Branch

Basel II Pillar 3 Disclosures

For the financial year ended 31 December 2019

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Malayan Banking Berhad - Brunei Darussalam Branch

Basel II Pillar 3 Disclosures

I. OVERVIEW

The Pillar 3 Disclosures for the financial year ended 31 December 2019 for Malayan Banking Berhad – Brunei Darussalam Branch (“Maybank” or the “Branch”) are in accordance with Autoriti Monetari Brunei Darussalam (“AMBD”) Guidelines on Pillar 3 Public Disclosure Requirements, which are the equivalent of that issued by the Basel Committee on Banking Supervision (“BCBS”) entitled International Convergence of Capital Measurement and Capital Standards (commonly referred to as Basel II).

Following the methodology employed by Malayan Banking Berhad (“Head Office” or the “Group”), the Branch adopts the following approaches in determining the capital requirements of Pillar 1 in accordance with AMBD’s Guidelines on Capital Adequacy Framework (Basel II – Risk-Weighted Assets):

- Credit Risk -Standardised Approach (“SA”) and will migrate to the Internal Ratings-Based (“IRB”) approaches progressively.
- Market Risk - Standardised Approach (“SA”).
- Operational Risk - Basic Indicator Approach (“BIA”)

LOCATION OF DISCLOSURE

The Pillar 3 Disclosures will be made available to the public upon request via hard copy or electronically.

II. CAPITAL MANAGEMENT

The Branch's approach to capital management is to ensure that the Branch maintains adequate level of capital necessary to support its business and growth and to meet regulatory capital requirements at all times.

The Branch's capital planning and assessment process is guided by Branch's Capital Management Framework. The Branch is required to develop own Capital Management Framework based on the overarching principles of the Maybank Group Framework taking into account the nature of business, risk profile and the local operating environment. This will ensure that capital is managed on an integrated approach and in compliance with all internal and external regulatory requirements across the Maybank Group.

The Capital Management Framework is to be reviewed and updated either on an annual basis or whenever necessary to reflect changes in policies, governance or regulatory environment, amongst others.

III. RISK MANAGEMENT FRAMEWORK

The Group's risk management approach, which is followed by the Branch, is underpinned by a sound and robust Integrated Risk Management Framework, which is constantly enhanced to remain relevant and resilient ahead of the versatile global risk landscape and changes in regulatory requirements, and leading practices in ensuring effective management of risk. The key principles are broadly described below:

Principles	Description
Establish risk appetite & strategy	The risk appetite is approved by the Head Office's Board, which articulates the nature, type and level of risk the Branch is willing to assume.
Assign adequate capital	The approach to capital management is driven by strategic objectives and accounts for the relevant regulatory, economic and commercial environment in which the Branch operates.
Ensure proper governance and oversight function	There is a clear, effective and robust Branch governance structure with well-defined, transparent and consistent lines of responsibility established within the Branch.
Promote strong risk culture	Institutionalisation of a strong risk culture that supports and provides appropriate standards and incentives for professional and responsible behaviour.
Implement sound risk framework, policies and procedures	Implementation of integrated risk framework, policies and procedures to ensure that risk management practices and processes are effective at all levels.
Execute strong risk management practices and processes	Robust risk management processes are in place to actively identify, measure, control, monitor and report risks inherent in all products and activities undertaken by the Branch.
Ensure sufficient resources and system infrastructure	Ensure sufficient resources, infrastructure and techniques are established to enable effective risk management.

RISK APPETITE

The Group's risk appetite is an integral component of the Maybank Group's robust risk management framework and is driven by both top-down Board leadership and bottom-up involvement of management at all levels. Our risk appetite enables the Board and Senior Management to communicate, understand and assess the types and levels of risk that the Maybank Group is willing to accept in pursuit of its business and strategic goals while taking into consideration constraints under stressed environment.

The risk appetite is integrated into the strategic planning process, and remains dynamic and responsive to the changing internal and external drivers such as market conditions, stakeholder's expectations and internal capabilities. In addition, the budgeting process is aligned to the risk appetite in ensuring that projected revenues arising from business transactions are consistent with the risk profile established. Our risk appetite also provides a consistent structure in understanding risk and is embedded in day-to-day business activities and decisions throughout the Group.

Guided by these principles, our risk appetite is articulated through a set of Risk Appetite Statements for all material risks across the Group and Branch to ultimately balance the strategic objectives of the Group.

RISK GOVERNANCE AND OVERSIGHT

The risk governance model provides a formalised, transparent and effective governance structure that promotes active involvement from the Board and Senior Management in the risk management process to ensure a uniform view of risk across the Maybank Group and the Branch. The governance model aims to place accountability and ownership whilst facilitating an appropriate level of independence and segregation of duties between the three lines of defense.

The risk governance structure is premised on the three lines of defense and clearly defines the lines of authority, roles and responsibilities to efficiently manage risk across the Group and Branch.

INDEPENDENT GROUP RISK FUNCTION

Maybank Group Risk Management provides an oversight of risk management on an enterprise-wide level through the establishment of the Maybank Group's risk strategies, framework and policies with independent assessment and monitoring of all risks challenges.

The key pillars of Maybank Group Risk functions are as follows:

- Provides close support and oversight within key businesses and countries in managing day-to-day risk.
- Drives and manages specific risk areas on an enterprise-wide level for a holistic risk view within the Maybank Group and the Branch.
- Supports sustainable and quality asset growth with optimal returns.

IV. CREDIT RISK

Credit risk is the risk of loss of principal or income arising from the failure of an obligor or counterparty to perform their contractual obligations in accordance with agreed terms.

REGULATORY CAPITAL REQUIREMENT

Amongst the various risk types the Branch engages in, credit risk continues to attract the largest regulatory capital requirement.

MANAGEMENT OF CREDIT RISK

Corporate credit risks are assessed by business units, where each customer is assigned a credit rating based on the assessment of relevant qualitative and quantitative factors including the customer's financial position, future cash flows, types of facilities and securities offered. These credits are then evaluated and approved by a party independent of the originator.

Reviews are conducted at least once a year with updated information on the customer's financial position, market position, industry and economic conditions, and conduct of account. Corrective actions are taken when the accounts show signs of credit deterioration.

The Branch manages its credit risk using a two-pronged approach:

- Managing the Credit Risk; and
- Managing the Credit Portfolio.

Retail credit exposures are managed on a programme basis. Credit programmes are assessed jointly between credit risk and business units. Reviews on the credit programmes are conducted at least once a year to assess the performances of the portfolios.

Credit approving authorities and committee structures are in place to ensure appropriate underwriting standards are enforced consistently throughout the Group and Branch level.

Management of Concentration Risk

Concentration risk can materialise from excessive exposures to a single counterparty and persons connected to it, a particular instrument or a particular market segment/sector.

In managing large exposures and to avoid undue concentration of credit risk in its loans and financing portfolio, the Branch has put in place, amongst others, limits and related lending guidelines for:

- Business segments;
- Economic sectors;
- Single customer groups;
- Banks and Non-Bank Financial Institutions ("NBFIs") and
- Collaterals.

Reviews of the said limits and related lending guidelines are undertaken on a periodic basis, whereupon any emerging concentration risks are addressed accordingly. Any exception to the limits and lending guidelines would be subject to approvals from higher credit authorities.

Asset Quality Management

The Branch has dedicated teams to effectively manage vulnerable corporate and consumer credits. Special attention is given to these vulnerable credits where more frequent and intensive reviews are performed in order to prevent further deterioration or, where necessary, accelerate remedial actions.

The Maybank Group's credit approving process encompasses pre-approval evaluation, approval and post-approval evaluation. Maybank Group Risk is responsible for developing, enhancing and communicating effective and consistent credit risk management policies, tools and methodologies across the Group. The Branch is to ensure appropriate standards are in place to identify, measure, control, monitor and report such risks.

In view that the authority limits are directly related to the risk levels of the borrower and the transaction, a Risk-Based Authority Limit structure is implemented based on the Expected Credit Loss principle and internally-developed Credit Risk Rating System.

Table 1 presents the geographical analysis and distribution of credit exposures under both the Standardized Approach and IRB Approach for the Branch.

Table 2 presents the credit risk exposures by various industries for the Branch.

Table 3 presents the credit risk exposures by maturity periods of one year or less, over one year to five years and over five years for the Branch.

Table 1: Disclosure on Credit Risk Exposure – Geographical Analysis for the Branch

Exposure Class	Brunei (BND'000)	Singapore (BND'000)	Total (BND'000)
As at 31 December 2019			
Bank, Development Financial Institutions & Multilateral Development Banks	-	204,376	204,376
Corporates	103,540	-	103,540
Regulatory Retail	101,528	-	101,528
Residential Mortgages	3,111	-	3,111
Other Assets	3,612	-	3,612
Total	211,791	204,376	416,167

Table 2: Disclosure on Credit Risk Exposure for Loan & Advances and Contingencies – Industry Analysis for the Branch

Exposure Class	Agriculture BND'000	Manufacturing BND'000	Construction BND'000	Wholesale, Retail Trade, Restaurants & Hotels BND'000	Finance, Insurance, Real Estate & Business BND'000	Transport, Storage & Communication BND'000	Education, Health & Others BND'000	Household BND'000	Total BND'000
Corporates	2,959	3,800	27,447	57,728	1,070	260	10,277	-	103,541
Regulatory Retail	-	388	22,347	3,574	-	-	4,367	70,851	101,527
Residential Mortgages	-	-	-	-	-	-	-	3,111	3,111
Total	2,959	4,188	49,794	61,302	1,070	260	14,644	73,962	208,179*

*The above amount excludes cash and short-term funds.

Table 3: Disclosure on Credit Risk Exposure – Maturity Analysis for the Branch

Exposure Class	One year or less BND'000	Over one year to five years BND'000	Over five years BND'000	Total BND'000
As at 31 December 2019				
Bank, Development Financial Institutions & Multilateral Development Banks	178,075	26,301	-	204,376
Corporate	6,243	81,806	15,491	103,540
Regulatory Retail	2,040	13,339	86,149	101,528
Residential Mortgages	1,783	-	1,328	3,111
Other Assets	-	3,612	-	3,612
Total	188,141	125,058	102,968	416,167

BASEL II REQUIREMENTS

In line with Basel II requirements for capital adequacy purposes, the parameters are calibrated to a full economic cycle experience to reflect the long-run, cycle-neutral estimations:

- **Probability of Default (“PD”)**

PD represents the probability of a borrower defaulting within the next 12 months. The first level estimation is based on portfolio's Observed Default Rate of the more recent years' data.

- **Loss Given Default (“LGD”)**

LGD measures the economic loss the bank would incur in the event of a borrower defaulting. Among others, it takes into account post default pathways, cure probability, direct and indirect costs associated with the workout, recoveries from borrower and collateral liquidation.

For Basel II purpose, LGD is calibrated to loss experiences during period of economic crisis whereby for most portfolios, the estimated loss during crisis years is expected to be higher than that during normal economic period. The crisis period LGD, known as Downturn LGD, is used as an input for Risk-Weighted Assets (“RWA”) calculation.

- **Exposure at Default (“EAD”)**

EAD is linked to facility risk, namely the expected gross exposure of a facility should a borrower default. The “race-to-default” is captured by Credit Conversion Factor (“CCF”), which should reflect the expected increase in exposure amount due to additional drawdown by a borrower facing financial difficulties leading to default.

CREDIT IMPAIRMENT POLICY AND CLASSIFICATION AND IMPAIRMENT PROVISIONS FOR LOANS AND ADVANCES

Refer to Note 3.4 and Note 2.5 of the Financial Statements for the accounting policies and accounting estimates on impairment assessment for loans and advances, respectively. The disclosures on reconciliation of impairment/allowance can be found in Note 29.5.6 of the Financial Statements.

This credit impairment policy is applicable to the Branch.

Table 4 provides details on impaired and past due loans for the Branch.

Table 4: Impaired and Past Due Loans, Advances and Financing and Allowances - Industry Analysis for the Branch

	Impaired Loans, Advances and Financing BND'000	Past Due Loans BND'000	ECL BND'000
As at 31 December 2019			
Agriculture	-	-	18
Manufacturing	-	-	17
Construction	6,776	754	4,034
Wholesale, retail trade, restaurants & hotels	2,325	586	2,154
Finance, insurance, real estate & business	-	-	-
Transport, storage & communication	-	-	4
Education, health & others	250	24	284
Household	14,139	2,311	4,157
Others	-	-	-
Total	23,490	3,675	10,668

CREDIT RISK MITIGATION

The Branch takes a holistic approach when granting credit facilities and do so very much based on the repayment capacity of the borrower, rather than placing the credit risk mitigation as a primary source of repayment. As a fundamental credit principle, the Branch generally does not grant facilities solely on the basis of collaterals provided. Credit facilities are granted based on the credit standing of the borrower, source of repayment and debt servicing ability.

Depending on a customer's credit standing and the type of product, facilities may be provided on an unsecured basis. Nevertheless, collateral is taken whenever possible to mitigate the credit risk assumed. The Branch's general policy is to promote the use of credit risk mitigation, justified by commercial prudence and good practice as well as capital efficiency. The value of collateral taken is also monitored periodically. The frequency of valuation depends on the type, liquidity and volatility of the collateral value. The main types of collateral taken by the Branch include cash, property, commercial, industrial, marketable instruments, bank guarantees, land, stand-by letter of credit and assigned insurance policies. For IRB purposes, personal guarantees are not recognised as an eligible credit risk protection.

Corporate guarantees are often obtained when the borrower's credit worthiness is not sufficient to accommodate an extension of credit. To recognise the effects of guarantees under the Foundation Internal Ratings-Based ("FIRB") Approach, the Branch adopts the Probability of Default substitution approach whereby exposures guaranteed by an eligible guarantor will utilise the PD of the guarantor in the computation of its capital requirement.

As a general rule-of-thumb, the following eligibility criteria must be met before the collateral can be accepted for IRB purposes:

- Legal Certainty**

The documentation must be legally binding and enforceable in all relevant jurisdictions.

- Material Positive Correlation**

The value of the collateral must not be significantly affected by the deterioration of the borrower's credit worthiness.

- Third-party Custodian**

The collateral that is held by a third-party custodian must be segregated from the custodian's own assets.

Tables 5 show the credit risk mitigation analysis for the Branch.

Table 5: Disclosure on Credit Risk Mitigation Analysis for the Branch

Exposure Class	Exposures before CRM BND'000	Exposures Covered by Guarantees/ Credit Derivatives BND'000	Exposures Covered by Eligible Financial Collateral BND'000	Exposures Covered by Other Eligible Collateral BND'000
As at 31 December 2019				
On-Balance Sheet Exposures				
Banks, Development Financial Institutions & Multilateral Development Banks	204,376	-	-	-
Corporates	87,285	-	5,534	19,222
Regulatory Retail	101,527	-	392	89,235
Residential Mortgages	3,111	-	-	3,028
Other Assets	3,612	-	-	-
Total On-Balance Sheet Exposures	399,911	-	5,926	111,485
Off-Balance Sheet Exposures				
Corporates	16,255	-	-	-
Regulatory Retail	1	-	-	-
Total for Off-Balance Sheet Exposures	16,256	-	-	-
Total On and Off-Balance Sheet Exposures	416,167	-	5,926	111,485

V. MARKET RISK

Market risk is the risk of financial loss where the value of the Branch's assets and liabilities could be adversely affected by changes in market variables such as interest rates, securities prices and foreign exchange rates. Market liquidity risk is the risk of financial loss caused by inability to secure market transactions at the required volume or price levels as a result of market turbulence or lack of trading liquidity.

Non-traded market risk is primarily inherent risk arising from banking book activities. The major risk classes are interest rate risk in the banking book and foreign exchange risk.

The Branch is not exposed in 2019 to significant market risk.

FOREIGN EXCHANGE RISK

Foreign exchange risk is the risk to earnings and economic value of foreign currency assets and liabilities caused by fluctuations in foreign exchange rates.

The Branch's foreign exchange exposures comprise non-trading foreign exchange exposure principally derived from interbranch nostro accounts. The Branch is not exposed to foreign exchange risk for Singapore Dollar (SGD) due to the currency Interchange Agreement between Singapore and Brunei which interchange the two currencies at par.

Foreign exchange risk is managed through policies and risk limits approved by the Asset and Liability Committee (ALCO). The limits, such as exposure by currency are independently monitored by Middle Office (MO). A summary of quantitative data about the Branch's net exposure to major foreign currencies is provided below, followed by a sensitivity analysis (assuming all other risk variables remain constant):

	GBP	USD	Others	Total
As at 31 December 2019				
Financial assets				
Group balances receivable	52	554	76	682
Financial liabilities				
Group balances payable	-	-	12	12

A 10% strengthening of BND against the foreign currencies as at year end, would have decreased profit or loss by B\$68 thousand. Similar impact would be expected on the Branch's equity balance as a result of this change in foreign currency rates. The analysis assumes that all other variables, in particular interest rates, remain constant.

A 10% weakening of BND against the foreign currencies as at year end would have had the equal but opposite effect on the amount mentioned above, on the basis that all other variables remain constant.

INTEREST RATE RISK

Interest rate risk is the risk to both earnings and capital arising from adverse movement in interest rates.

As at 31 December 2019, the interest rate profile of the Branch's interest-bearing financial instruments is as follows:

	BND '000
Fixed-rate assets	238,721
Floating-rate assets	183,888
Fixed-rate liabilities	(314,024)
	108,585

The Branch does not account for any fixed rate financial assets and liabilities at fair value through profit or loss. Therefore, a change in interest rates at the reporting dates would not affect profit or loss for fixed rate financial instruments.

At the reporting date, an increase of 100 basis points in interest rates would have increased profit or loss by B\$112 thousand for variable rate financial instruments. A decrease of 100 basis points in interest rates would have the opposite effect on profit or loss. This analysis assumes that all other variables remain constant.

EQUITY POSITION IN THE BANKING BOOK

The Branch is not exposed to equity price risk as there are no equity investments carried in the books.

VI. OPERATIONAL RISK

Operational risk is one of the principal risks in the overall Risk Management Framework and defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events (this includes legal risk, but excludes strategic and reputational risk).

The table below outlines the definition of the four (4) causal categories of operational risk:

Causal Categories	Definition
People	Risks resulting from staff defaulting in expected behavior or the organization being ineffective/inefficient in the management of its human capital.
Process	Risks resulting from inadequate/failed internal business processes or transaction process flows.
System	Risks resulting from inadequate or defaulting IT/communication systems, or the unavailability or integrity of data.
External Events	Risks resulting from events and actions from outside the organisation's immediate control having negative impact on the business.

Operational risk incidents that occurred may have different financial impact as illustrated below:

Impact Type	Definition
Actual Loss	<ul style="list-style-type: none"> Financial loss is incurred (either by a third party cost, or by writing-off a provision) and/or provision for loss is made, impacting the profit or loss account.
Potential Loss	<ul style="list-style-type: none"> Potential loss is a conservative estimate of the loss amount but the actual loss has yet to be determined.
Near Miss	<ul style="list-style-type: none"> Financial loss was averted by controls or mitigating actions for an operational risk incident.

Group Operational Risk Management strategy provides the overall principles, philosophy, objectives and goals for the management of operational risk.

The key components of the Group's ORM strategy are as follows:

- (i) ORM Methodology Design Principles
- (ii) Operational Risk Appetite

Under the Basel II rules, the Branch has adopted the Basic Indicator Approach to operational risk in which the charge for operational risk may be expressed as follows:

$$KBA = [\Sigma GI_1 \dots n \times \alpha] / n$$

where:

KBA = the capital charge under the Basic Indicator Approach

GI = annual gross income, where positive, over the previous three years

N = number of the previous three years for which gross income is positive

$\alpha = 15\%$

Certification

I certify that the above statements give a true and fair view of the Pillar 3 Disclosure of the Brunei Operations of Malayan Banking Berhad ("the Branch") as at 31 December 2019.



Sulaiman bin Isa
General Manager



Noor Hajirah Saban
Head, Finance