بنك دبي التجاري
Commercial Bank of Dubai

Basel III – Pillar III Disclosures

For The Period Ended 30 September 2022

Contents

1. Introduction

Commercial Bank of Dubai PSC ("the Bank") was incorporated in Dubai, United Arab Emirates (U.A.E.) in 1969 and is registered as a Public Joint Shareholding Company (PJSC) in accordance with Federal Law No. 32 of 2021. The Bank is listed on the Dubai Financial Market. The Bank's principal activity is commercial and retail banking. The registered address of the Bank is CBD Head Office, Al Ittihad Street, P.O. Box 2668, Dubai, United Arab Emirates.

2. Purpose and basis of preparation

The Central Bank of the UAE ("CBUAE") supervises Commercial Bank of Dubai ("the Bank") and its subsidiaries (together referred as the "Group") on a consolidated basis, and therefore receives information on the capital adequacy of, and sets capital requirements for, the Group as a whole. The capital requirements are computed at Group level using the Basel III framework of the Basel Committee on Banking Supervision ("Basel Committee"), after applying the amendments advised by the CBUAE, within national discretion. The Basel framework is structured around three pillars as follows:

- Pillar I prescribes the minimum capital requirements;
- Pillar II addresses the associated supervisory review process; and
- Pillar III specifies further public disclosure requirements in respect of their capital and risk profile.

The disclosures have been prepared in line with the disclosure templates introduced by the CBUAE guidelines on disclosure requirements (CBUAE/BSD/N/2020/4980 and CBUAE CBUAE/BSD/N/2021/5508) published in November 2020 and November 21 respectively.

The Pillar III report of the Group for the period ended 30 September 2022 comprises detailed information on the underlying drivers of risk-weighted assets (RWA), capital of the Bank, its wholly owned subsidiaries (together referred to as "the Group") and the Group's interest in an associate. The report should be read in conjunction with the Group's reviewed Financial Statements as at 30 September 2022. The direct subsidiaries and associate of the Group are as follows:

Legal entity	Group percentage Shareholding	Nature of business	Country of incorporation	Description of Accounting / Regulatory treatment
CBD Financial Services LLC	100%	Brokerage Services	Dubai, UAE	Consolidation
CBD Employment Services One Person Company LLC	100%	Supply of manpower services	Dubai, UAE	Consolidation
Attijari Properties LLC	100%	Property management services	Dubai, UAE	Consolidation
CBD (Cayman) Limited	100%	Issuance of debt securities	Cayman Islands	Consolidation
CBD (Cayman II) Limited	100%	Transact and negotiate derivative agreements	Cayman Islands	Consolidation
VS 1897 (Cayman) Limited	100%	To manage investments acquired in settlement of debt	Cayman Islands	Consolidation
Noor AlMethaq Real Estate Development LLC	100%	Real Estate Development	Dubai, UAE	Consolidation
National General Insurance Co. (PJSC)	17.8%	Life and general insurance business	Dubai, UAE	Consolidation – Equity Method

3. Overview of Pillar III

Pillar III complements the minimum capital requirements and the supervisory review process. Its aim is to encourage market discipline by developing disclosure requirements which allow market participants to access specified information on the scope of application of Basel III, capital, particular risk exposures and risk assessment processes, and hence the capital adequacy of the institution. Disclosures comprises of quantitative and qualitative information and are provided at the consolidated level.

The CBUAE issued Basel III capital regulations, which came into effect from February 1st, 2017, introducing minimum capital requirements at three levels, namely Common Equity Tier 1 (“CET1”), Additional Tier 1 (“AT1”) and Total Capital. Additional capital buffers (Capital Conservation Buffer and Countercyclical Capital Buffer – maximum up to 2.5% for each buffer) introduced are over and above the minimum CET1 requirement of 7%.

In November 2020, CBUAE issued revised standards and guidelines for Capital Adequacy in UAE. The new version to the Standards includes additional Guidance on the topics of Credit Risk, Market Risk and Operational Risk. Following are the changes in the revised standards which have been adopted either prior to or as of 30 June 2022:

- The Tier Capital Supply Standard
- Tier Capital Instruments Standard
- Pillar II Standard: Internal Capital Adequacy Assessment Procedures (ICAAP)
- Credit Risk, Market Risk and Operational Risk
- Equity Investments in Funds, Securitization, Counterparty Credit Risk and Leverage Ratio
- Credit Value Adjustment (CVA) for Pillar I and III

CBUAE requires the Pillar 2 - Supervisory Review Process to focus on each bank’s Internal Capital Adequacy Assessment Process (ICAAP) in addition to Pillar 1 Capital calculations. The ICAAP should include a risk based forward looking view of, but not limited to, Credit, Market and Operational Risk Capital.

The purpose of Pillar III – Market Discipline is to complement the minimum Capital requirements (Pillar I) and the supervisory review process (Pillar II). The CBUAE supports the market discipline by developing a set of disclosures requirements which will allow market participants to access key information on the scope of application, capital, risk exposure, risk assessment process and hence the capital adequacy of the Group. The revised Pillar III disclosures, based on the common framework, are an effective means of informing the market about the risks faced by the Bank, and provide a consistent and understandable disclosure framework that enhances transparency and improve comparability and consistency.

In compliance with the CBUAE Basel III standards and guidelines, these disclosures include qualitative and quantitative information of the Group’s risk management objectives and policies, risk assessment process, capital management and capital adequacy. The Group’s Pillar III disclosures are governed by the disclosure policy framework in line with CBUAE Basel III standards.

3.1 Policy and verification

The Bank has operated within a framework of internal controls and procedures for assessing the appropriateness of Pillar III market disclosure for period ended 30 September 2022.

This Pillar III disclosure have been subject to review from internal auditors and appropriate senior management within the Group and attested by the Board Executive Committee.

We confirm that the Bank's Pillar III disclosures, to the best of our knowledge, comply with the revised CBUAE Pillar III market disclosures requirements and have been prepared in compliance with the Bank's internal control framework.

3.2 Implementation of Basel III standards and guidelines

The Group has adopted the standardized approach for Credit Risk, Counterparty Credit Risk, Credit Valuation Adjustment (CVA) and Market Risk, mandate-based approach (MBA) for equity investments in funds held in the banking book and the basic indicator approach for Operational Risk (Pillar I) for regulatory reporting purposes.

The Group also assigns capital on other than Pillar I risk categories, for example 'Interest rate risk on banking book' and for 'Concentration risk', within the Pillar II framework.

4. Highlights

In line with Article 2.2. of Capital Adequacy Regulation, CBUAE requires banks to apply the following minimum requirement:

1. CET1 must be at least 7% of risk weighted assets (RWA);
2. Tier 1 Capital must be at least 8.5% of RWA.

Total Capital, calculated as the sum of Tier 1 Capital and Tier 2 Capital, must be at least 10.5% of RWA.

3. In addition to the minimum CET1 capital of 7% of RWA, banks must maintain a capital conservation buffer (CCB) and Countercyclical Capital Buffer (CCyB), maximum of 2.5% of RWAs on the form of CET1 capital.
4. All banks must maintain a leverage ratio of at least 3.0%.

The Group has complied with all the externally imposed capital requirements and is well capitalized with low leverage and high levels of loss-absorbing capacity. As at 30 September 2022:

- The Group's Common Equity Tier 1 (CET1) ratio of 12.06% (31 December 2021: 12.13%), Tier 1 capital Ratio of 14.43% (31 December 2021: 14.66%), Capital Adequacy Ratio of 15.59% (31 December 2021: 15.82%), are all above the regulatory requirements.
- The Group's leverage ratio of 10.31% (31 December 2021: 10.19%) is above the current regulatory requirement.
- The Group continues to manage its balance sheet proactively, with focus on sound RWA management.

5. Key Metrics (KM1)

Key prudential metrics related to regulatory capital have been included in the following table:

		30 Sep 2022	30 June 2022	31 Mar 2022	31 Dec 2021
	Available capital (amounts)	**(AED '000s)**	**(AED '000s)**	**(AED '000s)**	**(AED '000s)**
1	Common Equity Tier 1 (CET1)	11,212,876	10,888,495	10,728,586	10,578,131
1a	Fully loaded ECL accounting model	11,083,593	10,779,929	10,627,840	10,446,609
2	Tier 1	13,416,676	13,092,295	12,932,386	12,781,931
2a	Fully loaded ECL accounting model Tier 1	13,287,393	12,983,729	12,831,640	12,650,409
3	Total capital	14,490,746	14,150,405	13,962,951	13,790,908
3a	Fully loaded ECL accounting model total capital	14,361,462	14,041,839	13,862,205	13,659,386
	Risk-weighted assets (amounts)				
4	Total risk-weighted assets (RWA)	92,975,335	91,682,114	89,433,470	87,196,454
	Risk-based capital ratios as a percentage of RWA				
5	Common Equity Tier 1 ratio (%)	12.06%	11.88%	12.00%	12.13%
5a	Fully loaded ECL accounting model CET1 (%)	11.92%	11.75%	11.88%	11.97%
6	Tier 1 ratio (%)	14.43%	14.28%	14.46%	14.66%
6a	Fully loaded ECL accounting model Tier 1 ratio (%)	14.29%	14.16%	14.34%	14.50%
7	Total capital ratio (%)	15.59%	15.43%	15.61%	15.82%
7a	Fully loaded ECL accounting model total capital ratio (%)	15.45%	15.31%	15.50%	15.66%
	Additional CET1 buffer requirements as a percentage of RWA				
8	Capital conservation buffer requirement (2.5% from 2019) (%)	2.50%	2.50%	2.50%	2.50%
9	Countercyclical buffer requirement (%)	0.0%	0.0%	0.0%	0.00%
10	Bank D-SIB additional requirements (%)	0.0%	0.0%	0.0%	0.00%
11	Total of bank CET1 specific buffer requirements (%) (row 8 + row 9+ row 10)	2.50%	2.50%	2.50%	2.50%
12	CET1 available after meeting the bank's minimum capital requirements (%)	5.06%	4.88%	5.00%	5.13%
	Leverage Ratio				
13	Total leverage ratio measure	130,160,540	129,269,510	130,591,466	125,412,825
14	Leverage ratio (%) (row 2/row 13)	10.31%	10.13%	9.90%	10.19%
14a	Fully loaded ECL accounting model leverage ratio (%) (row 2A/row 13)	10.21%	10.04%	9.83%	10.09%
14b	Leverage ratio (%) (excluding the impact of any applicable temporary exemption of central bank reserves)	10.31%	10.13%	9.90%	10.19%
	Liquidity Coverage Ratio				
15	Total HQLA	-	-	-	-
16	Total net cash outflow	-	-	-	-
17	LCR ratio (%)	-	-	-	-
	Net Stable Funding Ratio				
18	Total available stable funding	-	-	-	-
19	Total required stable funding	-	-	-	-
20	NSFR ratio (%)	-	-	-	-
	ELAR				
21	Total HQLA	15,995,035	17,708,722	18,928,013	18,847,145
22	Total liabilities	104,136,411	104,539,985	106,116,373	100,745,398
23	Eligible Liquid Assets Ratio (ELAR) (%)	15.36%	16.94%	17.84%	18.71%
	ASRR				
24	Total available stable funding	89,164,762	92,464,193	90,815,735	90,833,058
25	Total Advances	82,859,584	82,620,325	82,114,764	79,932,460
26	Advances to Stable Resources Ratio (%)	92.93%	89.35%	90.42%	88.00%

"Fully Loaded" means bank's regulatory capital compared with a situation where the transitional arrangement had not been applied. CBUAE introduced transitional arrangements as per circular no. 04/2020 "Regulation Regarding Accounting Provisions and Capital Requirements - Transitional Arrangements".

6. Overview of Risk Weighted Assets (OV1)

The following table provides an overview of RWAs, calculated in accordance with Basel III, by risk type and calculation approach.

	(AED '000s)	RWA				Minimum capital requirements
		30 Sep 2022	**30 June 2022**	**31 Mar 2022**	**31 Dec 2021**	**30 Sep 2022**
1	Credit risk (excluding counterparty credit risk) - standardized approach (SA)	84,504,990	83,043,028	81,442,479	79,096,138	8,873,024
6	Counterparty credit risk (CCR) - standardized approach (SA)	844,863	871,117	981,155	1,215,179	88,711
10	Credit valuation adjustment (CVA)	370,991	522,305	-	-	38,954
12	Equity investments in funds - look-through approach		-	-	-	-
13	Equity investments in funds - mandate-based approach	204,738	212,339	21,589	406,903	21,497
14	Equity investments in funds – fall back approach	-	-	-	-	-
15	Settlement risk	-	-	-	-	-
16	Securitization exposures in the banking book	-	-	-	-	-
20	Market risk - standardized approach (SA)	1,303,248	1,286,820	1,241,742	731,729	136,841
23	Operational risk	5,746,505	5,746,505	5,746,505	5,746,505	603,383
26	**Total (1+6+10+12+13+14+15+16+20+23)**	**92,975,335**	**91,682,114**	**89,433,470**	**87,196,454**	**9,762,410**

During Q1 2020, the CBUAE issued a regulation for a 'Prudential Filter' that permits Banks to add back increase in IFRS 9 stage 1 and stage 2 provisions to the regulatory capital over a transition period of 5 years on proportionate basis. The increase in IFRS 9 provision requirements is determined by calculating the difference between the IFRS 9 provision as at 31 December, 2019 and the IFRS 9 provision as of the respective reporting date. The proportion of the increase in IFRS 9 provisions that is permitted to be added-back to regulatory capital from 1 January 2020 onwards will be phased out over a 5-year transition period as follows:

Years	2020	2021	2022	2023	2024
Proportion of Provision	100%	100%	75%	50%	25%

7 Leverage Ratio

7.1 Summary comparison of accounting assets vs leverage ratio exposure (LR1)

The following table reconciles the total assets in the published financial statements to the leverage ratio exposure measure.

		30 Sep 2022 (AED 000s)	30 June 2022 (AED 000s)	31 Mar 2022 (AED 000s)	31 Dec 2021 (AED 000s)
1	Total consolidated assets as per published financial statements	117,531,387	117,536,608	119,036,179	114,212,596
2	Adjustments 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 securitized exposures that meet the operational requirements for the recognition of risk transference	-	-	-	-
4	Adjustments for temporary exemption of central bank reserves (if applicable)	-	-	-	-
5	Adjustment for fiduciary assets recognized on the balance sheet pursuant to the operative accounting framework but excluded from the leverage ratio exposure measure	-	-	-	-
6	Adjustments for regular-way purchases and sales of financial assets subject to trade date accounting	-	-	-	-
7	Adjustments for eligible cash pooling transactions	-	-	-	-
8	Adjustments for derivative financial instruments	1,097,178	1,144,577	1,406,493	1,664,139
9	Adjustment for securities financing transactions (i.e., repos and similar secured lending)	-	-	-	-
10	Adjustments for off-balance sheet items (i.e., conversion to credit equivalent amounts of off-balance sheet exposures)	11,629,000	10,716,872	10,302,814	9,700,644
11	Adjustments for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital	-	-	-	-
12	Other adjustments	(97,025)	(128,547)	(154,020)	(164,554)
13	**Leverage ratio exposure measure**	**130,160,540**	**129,269,510**	**130,591,466**	**125,412,825**

7.2 Leverage ratio common disclosure template (LR2)

The following table provides a detailed breakdown of the components of the leverage ratio denominator, as well as information on the actual leverage ratio, minimum requirements and buffers.

		30 Sep 22	30 June 22	31 Mar 22	31 Dec 21
	On-balance sheet exposures (AED 000s)				
1	On-balance sheet exposures (excluding derivatives and securities financing transactions (SFTs), but including collateral)	117,531,387	117,536,608	119,036,179	114,212,596
2	Gross-up for derivatives collateral provided where deducted from balance sheet assets pursuant to the operative accounting framework	-	-	-	-
3	(Deductions of receivable assets for cash variation margin provided in derivatives transactions)	-	-	-	-
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-	-	-
5	(Specific and general provisions associated with on-balance sheet exposures that are deducted from Tier 1 capital)	-	-	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	(97,025)	(128,547)	(154,020)	(164,554)
7	**Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of rows 1 to 6)**	**117,434,361**	**117,408,061**	**118,882,159**	**114,048,042**
	Derivative exposures				
8	Replacement cost associated with *all* derivatives transactions (where applicable net of eligible cash variation margin and/or with bilateral netting)	416,131	399,842	507,002	721,353
9	Add-on amounts for PFE associated with *all* derivatives transactions	367,567	417,713	497,636	467,318
10	(Exempted CCP leg of client-cleared trade exposures)	-	-	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-	-	-
13	**Total derivative exposures (sum of rows 8 to 12)**	**1,097,178**	**1,144,577**	**1,406,493**	**1,664,139**
	Securities financing transactions				
14	Gross SFT *assets* (with no recognition of netting), after adjusting for sale accounting transactions	-	-	-	-
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-	-	-
16	CCR exposure for SFT assets	-	-	-	-
17	Agent transaction exposures	-	-	-	-
18	**Total securities financing transaction exposures (sum of rows 14 to 17)**	-	-	-	-

		30 Sep 22	30 June 22	31 Mar 22	31 Dec 21
	Other off-balance sheet exposures				
19	Off-balance sheet exposure at gross notional amount	37,690,223	35,438,126	35,331,274	31,775,130
20	(Adjustments for conversion to credit equivalent amounts)	(26,061,223)	(24,721,254)	(25,028,460)	(22,074,486)
21	(Specific and general provisions associated with off-balance sheet exposures deducted in determining Tier 1 capital)	-	-	-	-
22	**Off-balance sheet items (sum of rows 19 to 21)**	**11,629,000**	**10,716,872**	**10,302,814**	**9,700,644**
	Capital and total exposures				
23	**Tier 1 capital**	**13,416,676**	**13,092,295**	**12,932,386**	**12,781,931**
24	**Total exposures (sum of rows 7, 13, 18 and 22)**	**130,160,540**	**129,269,510**	**130,591,466**	**125,412,825**
	Leverage ratio				
25	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves)	10.31%	10.13%	9.90%	10.19%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	10.31%	10.13%	9.90%	10.19%
26	CBUAE minimum leverage ratio requirement	3.00%	3.00%	3.00%	3.00%
27	**Applicable leverage buffers**	7.31%	7.13%	6.90%	7.19%

8 Liquidity Risk

8.1 Eligible Liquid Assets Ratio (ELAR)

The following table presents the breakdown of the Bank's available high-quality liquid assets (HQLA), as measured and defined according to the CBUAE Liquidity Regulations.

1	High Quality Liquid Assets	30 Sep 2022		30 June 2022		31 Mar 2022		31 Dec 2021	
		Nominal amount	Eligible Liquid Asset	Nominal amount	Eligible Liquid Asset	Nominal amount	Eligible Liquid Asset	Nominal amount	Eligible Liquid Asset
		(AED 000s)	(AED 000s)	(AED 000s)	(AED 000s)	(AED 000s)	(AED 000s)	(AED 000s)	(AED 000s)
1.1	Physical cash in hand at the bank + balances with the CBUAE	11,731,627		13,514,782		12,068,559		14,729,110	
1.2	UAE Federal Government Bonds and Sukuks	2,887,172		2,874,847		5,644,037		2,871,250	
	Sub Total (1.1 to 1.2)		14,618,799	16,389,629	16,389,629	17,712,596	17,712,596	17,600,360	17,600,360
1.3	UAE local governments publicly traded debt securities	989,976		1,069,533		1,028,568		1,097,709	
1.4	UAE Public sector publicly traded debt securities	-		-		-		-	
	Subtotal (1.3 to 1.4)	989,976	989,976	1,069,533	1,069,533	1,028,568	1,028,568	1,097,709	1,097,709
1.5	Foreign Sovereign debt instruments or instruments issued by their respective central banks	386,260	386,260	249,560	249,560	186,849	186,849	149,076	149,076
1.6	**Total**	15,995,035	15,995,035	17,708,722	17,708,722	18,928,013	18,928,013	18,847,145	18,847,145
2	Total liabilities		104,136,411		104,539,985		106,116,373		100,745,398
3	**Eligible Liquid Assets Ratio (ELAR)**		15.36%		16.94%		17.84%		18.71%

8.2 Advances to Stables Resource Ratio (ASRR)

The following table presents the breakdown of the Bank's Advances to Stables Resource ratio as per the Liquidity regulations.

		Items	30 Sep 2022	30 June 2022	31 Mar 2022	31 Dec 2021
1		**Computation of Advances**	**(AED 000s)**	**(AED 000s)**	**(AED 000s)**	**(AED 000s)**
	1.1	Net Lending (gross loans - specific and collective provisions + interest in suspense)	77,357,178	77,040,786	76,879,785	74,562,303
	1.2	Lending to non-banking financial institutions	3,080,388	3,083,163	3,067,904	3,137,369
	1.3	Net Financial Guarantees & Stand-by LC (issued - received)	2,009,326	1,881,027	1,514,658	1,571,189
	1.4	Interbank Placements	412,692	615,349	652,417	661,599
	1.5	**Total Advances**	82,859,584	82,620,325	82,114,764	79,932,460
2		**Calculation of Net Stable Resources**				
	2.1	Total capital + general provisions	14,687,748	14,394,002	14,234,258	14,804,635
		Deduct:				
	2.1.1	Goodwill and other intangible assets	97,025	92,516	84,114	85,068
	2.1.2	Fixed Assets	1,901,129	1,821,315	1,822,847	1,745,072
	2.1.3	Funds allocated to branches abroad	-	-	-	-
	2.1.5	Unquoted Investments	379,009	398,648	262,985	281,389
	2.1.6	Investment in subsidiaries, associates and affiliates	91,515	89,742	98,115	95,051
	2.1.7	**Total deduction**	2,468,678	2,402,221	2,268,061	2,206,580
	2.2	**Net Free Capital Funds**	12,219,070	11,991,781	11,966,197	12,598,055
	2.3	**Other stable resources:**				
	2.3.1	Funds from the head office	-	-	-	-
	2.3.2	Interbank deposits with remaining life of more than 6 months	5,580,830	5,639,962	5,592,340	5,614,078
	2.3.3	Refinancing of Housing Loans	-	-	-	-
	2.3.4	Borrowing from non-Banking Financial Institutions	2,991,436	5,613,181	5,218,691	5,671,355
	2.3.5	Customer Deposits	68,097,951	68,943,794	67,763,032	66,674,095
	2.3.6	Capital market funding/ term borrowings maturing after 6 months from reporting date	275,475	275,475	275,475	275,475
	2.3.7	**Total other stable resources**	76,945,692	80,472,412	78,849,538	78,235,003
	2.4	**Total Stable Resources (2.2+2.3.7)**	89,164,762	92,464,193	90,815,735	90,833,058
3		**Advances to stable resources ratio (1.5 / 2.4*100)**	92.93%	89.35%	90.42%	88.00%

9 Comparative figures

Certain comparative figures have been reclassified to conform to the presentation adopted in these Basel III – Pillar III disclosures, the effect of which are considered immaterial.

10 Acronyms

ALCO	Assets & Liabilities Committee	IRR	Interest Rate Risk
ALM	Asset and Liability Management	LCR	Liquidity Coverage Ratio
AT1	Additional Tier 1	LGD	Loss Given Default
CBUAE	Central Bank United Arab Emirates	NIM	Net Interest Margin
CCF	Credit Conversion Factor	ORM	Operational Risk Management
CCP	Central Counterparty	OTC	Over the Counter Derivatives
CCR	Counterparty Credit Risk	PD	Probability of Default
CCyB	Countercyclical Capital buffer	PFE	Potential Future Exposure
CET1	Common Equity Tier 1	PRA	Prudential Regulation Authority
CRM	Credit Risk Mitigation	PSE	Public Sector entity
CVA	Credit Value Adjustment	RWA	Risk Weighted Asset
EAD	Exposure at default	SA	Standardized Approach
ECAI	External Credit Assessment Institutions	T1	Tier 1 Capital
EL	Expected Loss	T2	Tier 2 Capital
HQLA	High Quality Liquid Assets	TC	Total Capital
IFRS	International Financial Reporting Standards	VaR	Value at Risk
ICAAP	Internal Capital Adequacy Assessment Process		