



BASEL - PILLAR 3 DISCLOSURES

for the year ending

December 31, 2024

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I. Background

ICICI Bank Canada (the "Bank") is a chartered bank, incorporated and domiciled in Canada. It is a wholly owned subsidiary of ICICI Bank Limited (the "Parent Bank") and regulated by the Office of the Superintendent of Financial Institutions ("OSFI"). Effective January 1, 2013, the Bank has adopted the Basel III framework ("Basel III"), as required by OSFI. OSFI has issued a revised Capital Adequacy Requirements ("CAR") Guideline encompassing Basel II and Basel III requirements. The most significant aspects of Basel III are measures to improve the quality of capital and increase capital requirements for the global financial system. Common equity is now required to be the predominant form of capital.

Further, OSFI has issued the Leverage Requirements ("LR") Guideline in October 2014, effective from January 1, 2015. In accordance with the CAR Guideline, OSFI expects all institutions to maintain a leverage ratio that meets or exceeds 3% at all times and has also prescribed authorized "Leverage Ratio" requirements for individual institutions.

The CAR and LR Guidelines establish two minimum standards, the risk-based capital ratio and the leverage ratio, to provide a framework for assessing the adequacy of capital for all institutions. The leverage ratio test provides an overall measure of the adequacy of an institution's capital while the risk-based capital ratio focuses on risk faced by the institution. These capital adequacy and leverage ratio requirements apply on a consolidated basis and apply to all regulated financial institutions as defined in the CAR Guideline.

OSFI requires all banks to maintain sufficient capital to meet or exceed its capital adequacy requirements. While, the current CAR Guideline has prescribed minimum risk-based capital targets, OSFI may also set higher target capital ratios for individual institutions. The current thresholds of Common Equity Tier 1 ("CET1"), Tier 1 and total capital adequacy ratios (including capital conservation buffer) as per the CAR Guideline are 7%, 8.5% and 10.5%, respectively. The Bank is in compliance with OSFI's capital adequacy requirements in respect of risk-based CET 1, Tier 1 and Total capital ratios as well as the Leverage Ratio requirements.

The Basel II framework consists of the following three-mutually reinforcing pillars:

- Pillar 1: Minimum capital requirements for credit risk, market risk and operational risk;
- Pillar 2: Supervisory review of capital adequacy; and
- Pillar 3: Market discipline.

Market discipline (Pillar 3) comprises disclosures on the capital adequacy and risk management framework of the Bank. There are no entities that are required to be consolidated with the Bank or that require deduction treatment.

This document sets out the Pillar 3 disclosure requirements and is in addition to the consolidated Basel III – Pillar 3 Disclosures made by the Parent Bank.

II. Basis of Disclosures

1. Scope of Application of Pillar 3 Requirements

The Pillar 3 disclosures of the Bank have been prepared in accordance with *International Convergence of Capital Measurement and Capital Standards: A Revised Framework - Comprehensive Version (the Basel II framework)* issued by the Basel Committee on Banking Supervision ("BCBS") in June 2006. Subsequently BCBS issued *Enhancements to the Basel II Framework* in July 2009 and Revisions to the *Basel II Market Risk Framework* in February 2011 followed by *Pillar 3 Disclosure Requirements for Remuneration* in July 2011.

The third pillar of this framework describes the disclosure requirements for institutions subject to the Basel Accord, which in Canada includes banks, bank holding companies and federally regulated trust and loan companies (collectively, the "institutions"). Further, in June 2012, BCBS had issued *Composition of capital disclosure requirements – Rules text*. This publication sets out a framework to ensure that the components of banks' capital bases are publicly disclosed in standardized formats across and within jurisdictions for banks subject to Basel III. Accordingly, OSFI had issued an advisory on Public Capital Disclosure Requirements related to Basel III - Pillar 3 disclosures in July 2013 (with subsequent revisions) that provided expectations for Domestic Systemically Important Banks ("DSIBs") and non-DSIBs. The Bank has been providing quarterly disclosures on its website beginning in 2013 in line with these requirements. These Pillar 3 disclosures have been prepared in accordance with OSFI's disclosure requirements issued from time to time.

In January 2022, OSFI released final version of its Pillar 3 Disclosure guidelines for Small and Medium Sized Deposit-Taking Institutions (SMSBs) Capital and Liquidity Requirements incorporating final round of Basel-III reforms. OSFI's disclosure requirements for SMSBs are determined by SMSB segmentation category. OSFI requires institutions to fully implement the revised disclosures as described in this guideline in the fiscal Q2-2023 onwards. The primary changes include, separate Pillar 3 Disclosure Guidelines for D-SIBs and SMSBs, incorporation of the complete set of disclosures from the Basel framework for D-SIBs and clearer and more proportional disclosure requirements for SMSBs.

In March 2023, OSFI released final version of its guidelines on Climate Risk Management, outlining OSFI's expectations for the disclosures of climate-related risks as part of Annual Pillar 3 report effective the fiscal periods ending on or after October 1, 2024, 2025 and 2026, as applicable.

In November 2023, OSFI released final amendments to pillar 3 disclosure guidelines to incorporate the market risk and credit valuation adjustments (CVA) risk disclosures. These amendments are applicable for D-SIBs and SMSBs designated by OSFI to apply the market risk framework of the Capital Adequacy Requirements Guideline.

2. Functional and Presentation Currency

The Pillar 3 disclosures are presented in Canadian currency, which is the Bank's functional currency. Except as otherwise indicated, financial information presented in Canadian dollars has been rounded to the nearest thousand.

3. Frequency of Disclosures

Quantitative disclosures on regulatory capital and leverage ratios are published on a quarterly basis. The Pillar 3 disclosures are made on an annual basis and published after the audit of the year-end financial statements.

4. Location of Disclosures

The Basel - Pillar 3 disclosures are located under the “Regulatory Disclosures” link on the home page of the Bank’s website www.icicibank.ca. The Parent Bank’s consolidated disclosures are available at <https://www.icicibank.com/regulatory-disclosure.page>.

5. Limitation of Disclosures

The Pillar 3 disclosures are unaudited and have been prepared only for complying with OSFI's disclosure requirements explaining the basis on which the Bank has prepared and disclosed information about capital requirements and the management of certain risks and for no other purpose. They do not constitute any form of financial statements and may not be relied upon in making any investment in or judgment regarding the Bank or the Parent Bank.

III. Capital Structure

The Bank's total regulatory capital currently comprises Tier 1 and Tier 2 capital components which are subject to the various limits, restrictions and regulatory adjustments as described in Chapter 2 of the CAR Guideline. Tier 1 capital consists of CET 1 capital. CET 1 capital includes common shares, retained earnings, and accumulated other comprehensive income and other disclosed reserves. Tier 2 capital consists of certain eligible loan loss allowances termed as general allowances in CAR Guideline and defined as Stage 1 & Stage 2 allowances under IFRS 9.

The Bank's Capital Management Policy, which is reviewed and approved annually by the Board of Directors, governs the quantity and quality of capital to be maintained by the Bank. The objective of this policy is to maintain strong and efficient capital at levels that are appropriate for business requirements from time to time. The Bank also seeks to optimize return to shareholders and implement systems for monitoring the capital position.

The Bank estimates the regulatory capital requirements in line with the CAR Guideline issued by OSFI. Capital is provided for the purpose of unforeseen and unexpected events based on the risk assessment for each of the underlying asset classes in the Bank's portfolio. Further, in line with industry practice, the Bank acknowledges that capital is not the only mitigating factor for all unforeseen events and contingencies and, therefore, appropriate risk management and governance practices are in place to actively monitor the risks the Bank is exposed to in the course of carrying on its business.

The Bank is in compliance with OSFI's capital adequacy requirements. Capital Adequacy ratios are computed and circulated to senior management, including the Management Committee members on a monthly basis. In addition, the capital adequacy position and the risk weighted assets ("RWA") are reported to the Board of Directors on a quarterly basis.

Common shares

The Bank is authorized to issue an unlimited number of common shares without par value and an unlimited number of non-voting preferred shares without par value. OSFI must approve any plan to redeem the Bank's capital for cash. The Bank has issued 839,500,000 common shares for cash consideration to the Parent Bank.

The following table summarizes the amount and composition of the Bank's regulatory capital and capital ratios as at December 31, 2024:-

Capital Components	Amount in 000s CAD
<u>Regulatory Capital</u>	
<u>Common Equity Tier 1 (CET1) Capital</u>	
Common shares	249,500
Surplus (share premium) relating to common shares [@]	-
Retained earnings for accounting purposes	260,886
Accumulated other comprehensive income for capital purposes	522
	<u>510,908</u>
<u>Regulatory adjustments to CET1 Capital</u>	
Other deductions or regulatory adjustments to CET1 as determined by OSFI	-
Debit valuation adjustment on derivatives	-
Net CET1 Capital	<u>510,908</u>
Net Tier 1 Capital	<u><u>510,908</u></u>
<u>Tier 2 Capital</u>	
Eligible Stage 1 and Stage 2 allowance (re standardized approach) adusted for ECL Transitional Arrangements	14,488
Net Tier 2 Capital	<u>14,488</u>
Total Capital	<u><u>525,396</u></u>

@ Effective April 2014, only surplus (share premium) resulting from the issue of instruments can be included in CET1 capital. Since the additional paid-in capital recorded by the Bank is not related to issue of common shares, it is ineligible for inclusion as CET1 capital.

IV. Capital Adequacy

1. Approaches

The amount and composition of the Bank's capital requirement is determined by assessing the minimum capital requirement under Pillar 1 based upon the CAR Guideline, the impact of stress and scenario tests, the Bank's risk appetite and also the capital requirement that is consistent with the Bank's business plan.

Further, the CET 1, Tier 1 and Total capital ratios are computed by dividing CET 1, Tier 1 and total capital by total adjusted RWA determined under Pillar 1 as per OSFI's CAR Guideline. OSFI has stipulated the minimum capital requirements in Chapter 1 of CAR Guideline and expects all institutions to attain a target CET 1 ratio of 7% by Q1, 2013, 8.5% for total tier 1 and 10.5% for total capital.

The Bank determines its Pillar 1 regulatory capital requirement based on the following approaches:

a) Credit risk - Standardized Approach

The Bank has adopted the Standardized Approach for computing capital requirements under credit risk. Under the Standardized Approach, the Bank applies risk weights to various on-balance sheet and off-balance sheet (credit equivalent amounts) exposures with the exception of items that are deducted from capital as regulatory adjustments pursuant to the CAR Guideline, section 2.3 of Chapter 2 – Definition of Capital. On-balance sheet exposures include claims on sovereigns, banks including Securities Firms and Other Financial Institutions Treated as Bank, corporates including specialized lending, CRE, Land ADC, residential mortgages, retail portfolio, equity, securitization exposure, etc. Off-balance sheet exposures include undrawn commitments, direct credit substitutes, transaction-related contingencies, trade-related contingencies, interest rate swaps, forward foreign exchange contracts, cross currency swaps, etc.

Further, the exposures are categorized into drawn, undrawn commitments, repo-style transactions, OTC derivatives and other off-balance sheet exposures. The Bank computes gross exposure as the sum of the total on-balance sheet exposures and credit equivalent amount for off-balance sheet exposures gross of allowances for credit loss. Further, "net exposure" refers to gross exposure net of individual allowances. Net exposures after applying Credit Risk Mitigation are risk weighted as per CAR Guideline for computation of total adjusted RWA for credit risk.

b) Market risk Approach

The market risk framework was not applicable to the Bank as at December 31, 2024. Paragraph 2 of Chapter 9 of OSFI CAR Guideline 2023 specifies that market risk requirements apply only to internationally active institutions. Further, paragraph 3 of the Chapter 9 mentions that OSFI retains the right to apply the framework to other institutions, on a case by case basis and all institutions designated by OSFI as domestic systemically important banks ("D-SIBS") shall meet the requirements of this Chapter. Also as required by OSFI's CAR Guideline, the trading book exposures have been included as part of the banking book exposures.

c) Operational risk - The Simplified Standardized Approach ("SSA")

The Bank has adopted the Simplified Standardized Approach for computing capital requirements under operational risk. Under this approach the Bank is required to hold capital for operational risk equal to 15% of average annual adjusted gross income over the previous 12 fiscal quarters. The CAR Guideline defines "adjusted gross income" as lesser of (i) absolute value of net interest income and (ii) 2.25% of interest earning assets, dividend income, absolute value of fee and commission income, other income, net profit/loss (trading book) & (banking book). The RWA for operational risk is calculated as 12.5 times the operational risk capital charge under SSA.

Leverage Ratio

Effective January 1, 2015, the Bank calculates Leverage Ratio ("LR"). The Leverage Ratio is defined as the capital measure (the numerator) divided by the exposure measure (the denominator) and is expressed as a percentage. OSFI expects all institutions to maintain a leverage ratio that meets or exceeds 3% at all times beginning in Q1 2015. The Superintendent may also prescribe authorized leverage ratio requirements for individual institutions.

Approaches to assessing capital adequacy

The Bank, in line with the regulatory capital requirements of OSFI and the Parent Bank's regulator, the Reserve Bank of India ("RBI"), has instituted an Internal Capital Adequacy Assessment Process ("ICAAP") which is used to estimate the capital requirements in line with the risk appetite of the Bank. The ICAAP is approved by the Risk Committee ("RC") of the Board of Directors.

The Bank's capital management framework includes a comprehensive ICAAP conducted annually which determines the adequate level of capitalization for the Bank to meet regulatory norms as well as current and future business needs, including under stress scenarios. The ICAAP encompasses capital planning for a three-year time horizon, identification and measurement of material risks and the relationship between risk and capital.

The capital management framework is complemented by the risk management framework, which includes a comprehensive assessment of material risks. Stress testing, is conducted to assess the impact of stress events on the Bank's risk profile and internal capital adequacy requirements. Stress testing, which is a key aspect of the ICAAP and the risk management framework, provides an insight on the impact of extreme but plausible scenarios on the Bank's risk profile and capital position. Based on the Board-approved stress testing framework, the Bank conducts stress tests on its various portfolios and assesses the impact on its capital ratios and the adequacy of capital buffers for current and future periods.

The Bank periodically assesses and refines its stress tests in an effort to ensure that the stress scenarios capture material risks as well as reflect possible extreme market moves that could arise as a result of market conditions. The Bank uses the ICAAP to determine the Bank's growth strategy, risk profile and minimum capital resource requirements and formulates its internal capital level targets based on the ICAAP and endeavors to maintain its capital adequacy level in accordance with the targeted levels at all times. The business and capital plans and the stress testing results of the group entities are integrated into the ICAAP.

Based on the ICAAP, the Bank determines the level of capital that needs to be maintained by considering the following in an integrated manner:

- Bank's strategic focus, business plan and growth objectives;
- Regulatory capital requirements as per OSFI guidelines;
- Assessment of material risks (Pillar 1 and Pillar 2);
- Impact of stress testing and scenario analysis; and
- Potential management actions in the event of stress.

Monitoring and reporting

The Board of Directors of the Bank maintains an active oversight of the Bank's capital adequacy levels. A summary of the capital adequacy parameters and the leverage ratio are reported to the Board of Directors on a quarterly basis. Further, the ICAAP also serves as a mechanism for the Board to assess and monitor the Bank's capital adequacy position over a three year time horizon.

2. Pillar 1 Regulatory Capital Requirement

The following table summarizes the Bank's Pillar 1 credit RWA under each of the standardized exposure classes as at December 31, 2024:

	Amount in 000s CAD
Standardized approach – credit risk asset classes	RWA
Banking Book (excl. securitizations)	
Corporate	1,737,187
<i>of which :</i>	
<i>Specialized Lending</i>	38,634
<i>General Commercial Real Estate</i>	186,147
<i>Land Acquisition, Development and Construction</i>	25,939
Sovereign	-
Bank	159,813
<i>of which :</i>	
<i>Securities Firms and Other Financial Institutions Treated as Bank</i>	94,663
Retail Residential Mortgages	360,018
Other Retail excl. SBE	52,517
SBE treated as Other Retail	-
Equity	225
Trading Book	-
Securitizations	-
CVA	7,188
Other credit risk-weighted assets	86,679
Total adjusted risk-weighted assets for credit risk	2,403,627
Standardized Approach - Market Risk	-
The Simplified Standardized Approach - Operational Risk	259,200
Total adjusted RWA	2,662,827

The following table summarizes the Bank's regulatory capital ratios and Leverage Ratio as at December 31, 2024:-

<u>Regulatory capital ratios</u>	
CET 1 Capital (%)	19.19%
Tier 1 Capital (%)	19.19%
Tier 2 Capital (%)	0.54%
Total Capital (%)	19.73%
Leverage ratio	8.99%

3. Credit Risk

a) Credit Risk Management

ICICI Bank Canada is a full service bank operating in Canada, offering Corporate & Commercial Banking services, Retail Banking services and Treasury services that support both the Bank's balance sheet management and the requirements of its Corporate & Retail clients.

In keeping with the principles of the Basel Committee on Banking Supervision, the Bank takes a "three-lines-of-defence" approach to managing risk. The business functions and units within the Bank are themselves the first line of defence. They "own" the risk in their respective operations. The second line of defence is provided by the Risk Management Group (RMG) along with other control units within the Bank (i.e., units not having business line responsibilities) including Compliance, Legal, Finance, Operations and the Human Resources units. These units provide independent oversight and establish risk management policies, structure, processes and practices that address all significant risks across the Bank. The third line of defence is provided by the Internal Audit function, which monitors the efficiency and effectiveness of controls across various business functions and units within the Bank including control, risk management and governance processes. With these elements in place, the operation of the risk governance structure enables the Bank in: risk identification & assessment, risk responsiveness, risk focus in decision-making, establishment of risk parameters & limits, and risk education and training.

The Chief Executive Officer ("CEO"), the Chief Risk Officer ("CRO") and the other members of Senior Management are responsible for risk management under the direct oversight of the Committees of the Board. In this regard, it is noteworthy that the CRO reports to the CEO but also has direct access to the Chair of the Risk Committee (RC) and its members.

The Enterprise Risk Management Framework (ERMF) defines Bank's risk appetite and key limits across all risks. The Bank ensures that its risk appetite is well established, monitored, and communicated throughout the organization and that the Bank's objectives, strategy and values align with its risk appetite. The risk limits are shaped by the Bank's guiding risk principles and are set to ensure that risk-taking activities are within the risk appetite. The risk limits control risk-taking activities within the Bank. The limits also establish accountability for key tasks in the risk-taking process and institute the level or conditions under which transactions may be approved or executed.

Credit risk arises from unexpected losses that may occur if the Bank's borrowers or market counterparties fail to meet their obligations to pay. Credit risk mostly arises due to the Bank's exposure to borrower default on exposures. Credit risk is appropriately managed & controlled by undertaking sound risk analysis & measurement, and by using appropriate monitoring & reporting practices & systems.

The Bank's Corporate and Commercial Credit & Recovery Policy ("CCCRP"), Retail Credit & Recovery Policy ("RCRP") and Residential Mortgage Underwriting Policy ("RMUP"), which are approved by its Board, together describe the principles which underlie and drive the Bank's approach to credit risk management together with the systems and processes through which it is implemented and administered. The Bank's policies align with OSFI requirements and guidelines. They are reviewed annually by the applicable Board Committee and amended periodically based on recommendations from the RMG, Internal and External Audit, the business functions themselves and from Senior Management.

In case of lending to large corporates, no individual delegated authorities are provided for under the Bank's governance framework and all authorizing powers rest with the Management Credit Committee (MCC) and the RC. For lending under residential mortgages and other retail products, a detailed delegated lending authority (with RC of the Board being the highest approving authority) is provided in the Board approved RMUP and RCRP respectively.

The MCC is chaired by the President and CEO and comprises senior executives of the Bank, with the CRO being an Alternate Chair and permanent member. The MCC approves credit proposals before recommending them to the RC, manages the credit risk on a portfolio basis for corporate/commercial and residential mortgage business and reviews asset quality and portfolio quality on a monthly basis.

The Bank takes a two-tier approach to assessment of credit risk for its corporate and commercial lending business: initially, by a commercial lending officer proposing the transaction, followed by a risk officer independently assessing the same. The CCCRP lays down a structured and standardized credit approval process, which includes a well-established procedure of independent and comprehensive credit risk assessment and the assignment of an internal risk rating to the borrower. The risk rating is a critical input for the credit approval process and is used as an input in arriving at the credit risk spread, and also subsequently, in arriving at the loan loss allowance against the credit.

Independent groups have been constituted across the Bank to facilitate the evaluation, monitoring and reporting of credit risk. The Credit Risk Management Group ("CRMG") rates proposals using appropriate rating models, carries out industry analysis, tracks the quality of the credit portfolio. The Loan Services Operations Group ("LSOG") verifies adherence to the terms of loan approvals prior to commitment and disbursement of the credit facilities and carries out activities related to post-authorization monitoring. It also reviews the completeness of documentation and creation of security for assets financed and post-disbursement monitoring as per stipulated terms and conditions.

The residential mortgage applications are electronically transmitted from the mortgage brokers and the Bank's direct sourcing channels into an underwriting system with built-in business rules to determine parameters/approval authorities to facilitate the underwriting process. The underwriting team is responsible for credit administration, which includes monitoring compliance with the terms and conditions for the committed mortgages prior to disbursement. The closing centers review the completeness of documentation and creation of security including title insurance for the mortgage.

The Bank has a detailed calendar of reviews that is used to review the credit risk position. Additional portfolio reviews based on market developments take place when necessary. The risk reports aggregate measures of risk across businesses and products and are used by the Board and Senior Management with a view to complying with policies, limits, and guidelines as well as understanding the Bank's risk position and the performance of the portfolios. The Bank ensures that independent audit functions are established to review reports to the Board regarding adherence to the processes, procedures and controls for managing risk.

Monitoring of credits, while ongoing as part of scheduled periodic credit reviews, can also be triggered by any material credit event coming to the Bank's notice through either primary or secondary sources. All borrower accounts, including their ratings and underlying collateral, are reviewed at least on an annual basis or in a shorter interval if recommended by the CRO or the relevant authorizing committee.

Equity exposure:

The Bank's equity exposure includes an investment of \$90 [£50,000] in ICICI Bank UK PLC which is risk weighted at 250% under the Standardized Approach for credit RWA.

The following table summarizes the Bank's total gross credit risk exposure (credit-equivalent amount for OTC derivative exposures) and risk-weighted assets ("RWA") as at December 31, 2024:

Amount in 000s CAD						
Portfolio	Drawn	Undrawn Commitments ¹	OTC Derivatives	Other Off Balance sheet Items ¹	Total	RWA
Corporate	1,698,536	407,728	8,667	47,095	2,162,026	1,737,187
of which :						
Specialized Lending	33,780	12,135	-	57	45,972	38,634
General Commercial Real Estate	178,827	18,299	-	-	197,126	186,147
Land Acquisition, Development and Construction	18,234	215	-	43	18,492	25,939
Sovereign	510,145	-	-	-	510,145	-
Bank	395,094	20,790	13,226	49,543	478,653	159,813
of which :						
Securities Firms and Other Financial Institutions Treated as Bank	238,776	-	-	-	238,776	94,663
Total Institutional Credit Exposures	2,603,775	428,518	21,893	96,638	3,150,824	1,897,000
Residential Mortgages	2,727,002	8,152	-	-	2,735,154	360,018
Other Retail (excl. SMEs)	49,024	33,471	-	-	82,495	52,517
Retail SME	-	-	-	-	-	-
Total Retail Credit Exposures	2,776,026	41,623	-	-	2,817,649	412,535
Equity Exposures	90	-	-	-	90	225
CVA risk	-	-	-	-	-	7,188
Other credit risk-weighted assets ²	88,011	-	-	-	88,011	86,679
Total Gross Credit Exposures	5,467,902	470,141	21,893	96,638	6,056,574	2,403,627

The following table summarizes the Bank's total average gross credit risk exposure (credit-equivalent amount for OTC derivative exposures) and risk-weighted assets ("RWA") as at December 31, 2024:

Amount in 000s CAD						
Portfolio	Drawn	Undrawn Commitments ¹	OTC Derivatives	Other Off Balance sheet Items ¹	Total	RWA
Corporate	1,622,690	456,189	3,495	60,709	2,143,082	1,684,183
of which :						
Specialized Lending	37,885	14,727	-	55	52,667	41,586
General Commercial Real Estate	113,122	19,122	-	-	132,244	120,771
Land Acquisition, Development and Construction	13,670	368	-	372	14,411	19,366
Sovereign	507,255	-	-	-	507,255	-
Bank	419,124	21,208	37,491	55,346	533,170	175,721
of which :						
Securities Firms and Other Financial Institutions Treated as Bank	261,815	120	-	-	261,935	104,583
Total Institutional Credit Exposures	2,549,069	477,397	40,986	116,055	3,183,508	1,859,904
Residential Mortgages	3,112,444	10,349	-	-	3,122,793	411,577
Other Retail (excl. SMEs)	42,295	18,424	-	-	60,719	42,706
Retail SME	-	-	-	-	-	-
Total Retail Credit Exposures	3,154,739	28,773	-	-	3,183,511	454,282
Equity Exposures	1,649	-	-	-	1,649	4,124
CVA risk	-	-	-	-	-	5,501
Other credit risk-weighted assets ²	61,283	-	-	-	61,283	61,539
Total Gross Credit Exposures	5,766,741	506,170	40,986	116,055	6,429,952	2,385,350

Note: Gross credit exposure is gross of all allowances for credit loss and average exposure has been calculated based on monthly average exposures.

¹ Undrawn commitments and other Off B/S items have been included at notional principal value.

² Includes RWA on Credit Valuation Adjustments on Bilateral OTC Derivatives.

The following table summarizes the Bank's total gross credit exposures (credit-equivalent amount for OTC derivative exposures) by risk weights as at December 31, 2024:

Amount in 000s CAD					
Exposure Category	Drawn	Undrawn Commitments ¹	OTC Derivatives	Other Off Balance sheet Items ¹	Total
0% risk weight	519,861	-	-	-	519,861
More than 0% but Less than 100% risk weight	3,264,798	108,776	12,886	51,843	3,438,303
100% risk weight	1,662,154	361,150	9,007	44,795	2,077,106
More than 100% risk weight	21,089	215	-	-	21,304
Total Gross Credit Exposures	5,467,902	470,141	21,893	96,638	6,056,574

¹: Undrawn commitments and other Off B/S items have been included at notional principal value.

The following is a summary of the Bank's total net credit exposures after credit risk mitigation ("CRM") by risk weights as at December 31, 2024:

Amount in 000s CAD			
Exposure Category	Rated	Unrated	Total
0% risk weight	510,145	9,716	519,861
More than 0% but Less than 100% risk weight	413,295	1,169,249	1,582,544
100% risk weight	8,307	1,804,283	1,812,590
More than 100% risk weight	-	21,089	21,089
Total Net Credit Exposures after CRM	931,747	3,004,337	3,936,084

Note: Net credit exposure is gross credit exposure (credit equivalent amount for Off B/S exposures) less specific allowances, eligible financial collateral and eligible guarantees/credit derivatives.

The following table summarizes the Bank's total gross credit exposures by geography based on the location of ultimate risk as at December 31, 2024:-

Amount in 000s CAD				
Category	Canada	India	Others	Total
Deposit with Bank	110,330	1,716	59,057	171,103
Securities	458,478	-	-	458,478
Loans	4,381,986	49,639	305,594	4,737,219
Undrawn Commitments	469,979	163	-	470,142
OTC Derivatives	21,577	316	-	21,893
Other Off Balance Sheet Items	48,546	47,443	649	96,638
Equity	-	-	90	90
Total	5,490,896	99,277	365,390	5,955,563

Note: Gross credit exposure (credit equivalent amount for Off B/S exposures) by geography excludes accrued interest of CAD 12,348 and other assets of CAD 88,664.

The following table summarizes the Bank's industry-wise distribution of total gross credit exposures as at December 31, 2024:

Amount in 000s CAD								
Category	Deposit with Bank	Securities	Loans	Undrawn Commitments ¹	OTC Derivatives	Other Off Balance sheet Items ¹	Equity	Total
Residential mortgages			2,950,904	8,153				2,959,057
Personal loans			49,014	33,471				82,485
Total Gross Retail Exposures			2,999,918	41,624				3,041,542
Accommodation and food services			102,390	2,304				104,694
Admin & Support, Waste Mgmt and Remediation			117,103	36,225		2,832		156,160
Arts, entertainment and recreation								-
Construction			79,590	16,000		17,507		113,097
Educational services			15,355	634		2,700		18,689
Energy					3,630			3,630
Finance & Insurance	171,103	-	323,853	167,060	13,203	49,654	90	724,963
Government & Sovereign		458,478						458,478
Health care and social assistance			25,061	8,607		142		33,810
Information and Cultural Industries			57,053	14,391				71,444
Manufacturing			375,818	42,682		5,231		423,731
Mining, Quarrying and Oil and Gas Extraction			51,484	41,248				92,732
Professional, Scientific & Technical Services			93,518	30,746		3,099		127,363
Real Estate and Rental and Leasing			146,308	22,443				168,751
Retail Trade			137,986	23,229		1,491		162,706
Transportation & Warehousing			73,348	11,130		457		84,935
Utilities			55,797					55,797
Wholesale Trade			90,258	10,419		2,702		103,379
Service-Others							-	-
Others				1,400	5,060	10,824		17,285
<i>Deferred loan fees and premium</i>			(7,621)					(7,621)
Total Gross Exposures Excluding Retail	171,103	458,478	1,737,301	428,518	21,893	96,638	90	2,914,022
Total Gross Credit Exposures	171,103	458,478	4,737,219	470,142	21,893	96,638	90	5,955,564

¹ Undrawn commitments and other Off B/S items have been included at notional principal value.

² Others include securitization exposure and cash back transactions under securities and other off balance sheet items respectively.

The following table summarizes the Bank's maturity pattern of assets as at December 31, 2024:

Maturity buckets	Amount in 000s CAD						
	Cash	Balances with banks & money at call and short notice	Investments	Loan Advances net of allowances for credit losses	Fixed assets	Other assets	Total assets
Next day	3,081	171,103	446,041	6,427	-	76	626,728
2 to 7 days	-	-	-	11,672	-	592	12,264
8 to 14 days	-	-	-	19,952	-	535	20,487
15 to 30 days	-	-	-	120,002	-	1,431	121,432
31 days upto 2 months	-	-	-	145,447	-	2,569	148,016
More than 2 months and upto 3 months	-	-	-	139,839	-	2,573	142,412
More than 3 months and upto 6 months	-	-	-	426,938	-	7,676	434,614
More than 6 months and upto 1 year	-	-	-	838,681	-	2,262	840,943
More than 1 year and upto 3 years	-	-	-	1,867,191	-	1,512	1,868,703
More than 3 year and upto 5 years	-	-	-	938,306	-	1,244	939,551
Above 5 years	-	-	12,437	197,244	24,992	52,558	287,231
Total	3,081	171,103	458,478	4,711,699	24,992	73,029	5,442,383

b) Credit Risk Mitigation

Collateral management

Collateral is obtained when the loan is initially granted and is monitored periodically. For impaired loans, the available collateral has been considered in determining loan loss allowances. The types of acceptable collateral are documented in various relevant policy documents. The main types of collateral obtained are as follows:

- For corporate/commercial lending, assets of the borrower/corporate guarantors, personal assets of the principals and/or pledge of equity interests, charge on equipment and current assets, hypothecation of movables. Generally, for commercial lending, the Bank also obtains guarantees from parent companies for loans to their subsidiaries;
- For retail lending on a case to case basis, charge on personal assets, including real estate/property; and
- For residential mortgages, first/second mortgage charge in favor of the Bank, as well as insurance by Canada Mortgage and Housing Corporation ("CMHC") or approved private insurers.

All borrower accounts, including their ratings and underlying collateral, are reviewed at least on an annual basis or in a shorter interval if recommended by the CRO or the relevant sanctioning committee.

Credit Risk Mitigation techniques

The OSFI Guideline on CAR allows the following credit risk mitigants to be recognized for regulatory capital purposes:

- Eligible financial collaterals, which include cash (deposited with the Bank), and securities issued by Federal and Provincial Government; and
- Eligible guarantees/credit derivatives including for residential mortgages insured by CMHC/private insurer.

The Bank reckons the permitted credit risk mitigants for obtaining capital relief through a reduction in RWA only when the credit risk mitigant fulfills the conditions stipulated for eligibility by OSFI in its guidelines on CAR.

Concentrations within credit risk mitigation

The CAR Guideline, among its conditions for eligible credit risk mitigants, requires that there should not be a material positive correlation between the credit quality of the counterparty and the value of the collateral being considered. Currently, the Bank does not have any concentration risk within credit risk mitigation.

The following table summarizes the portfolio covered by eligible financial collateral and guarantees/credit derivatives as at December 31, 2024:

Amount in 000s CAD		
Risk-weighted assets	Eligible financial collateral	Eligible guarantees/ credit derivatives
Corporate	28,853	122,118
of which :		
Specialized Lending	29	-
General Commercial Real Estate	-	-
Land Acquisition, Development and Construction	22	-
Sovereign	-	-
Bank	-	-
of which :		
Securities Firms and Other Financial Institutions	-	-
Total Institutional Credit Exposures	28,853	122,118
Residential Mortgages	-	-
Other Retail (excl. SMEs)	9,255	-
Retail SME	-	-
Total Retail Credit Exposures	9,255	-
Total Gross Credit Exposures	38,108	122,118

External ratings

The Bank uses external ratings of recognized rating agencies identified in the CAR Guideline for its sovereign, bank and securitization exposures. Accordingly, ratings from external rating agencies S&P, Fitch, Moody's and DBRS are used for capital adequacy purposes. The Bank also uses the standard mapping published in the CAR guidelines.

c) Counterparty Credit Risk

Counterparty credit risk ("CCR") in the context of Pillar 3 disclosure is the risk that the counterparty to a derivative transaction posted to either the Banking Book or Trading Book could default before the final settlement of the transaction's cash flows. The Bank uses the Standardized Approach for Counterparty Credit Risk (SA-CCR) to measure the credit equivalent amount of counterparty credit exposures as defined in the CAR guidelines. Further, the risk-weighted amounts represent the credit equivalent amount risk weighted according to the creditworthiness of the counterparty.

The following table summarizes the notional principal values of the derivative instruments along with the gross positive and gross negative fair value, credit equivalent amount and risk-weighted assets as at December 31, 2024:

	Amount in 000s CAD				
	Notional Principal Amount	Gross Positive Fair Value	Gross Negative Fair Value	Credit Equivalent Amount	Risk- weighted assets
Trading					
Forward foreign					
exchange contracts	62,888	2,063	287	4,719	4,681
Foreign currency swaps	1,231,029	1,319	41,875	9,996	2,836
Interest rate swaps	151,989	1,748	806	4,526	4,346
Hedging					
Bond forwards	-	-	-	-	-
Interest rate swaps	255,000	1,513	-	2,652	795
Total	1,700,906	6,643	42,968	21,893	12,658

d) Impairment

Scope

The Bank applies a three-stage approach to measure allowance for credit losses, using an ECL approach as required under IFRS 9, for the following categories of financial instruments that are not measured at fair value through profit or loss:

- Amortized cost financial assets;
- Debt securities classified as at FVOCI

Off-balance sheet items subject to impairment assessment include financial guarantees and undrawn loan commitments.

ECL impairment model

The Bank measures the ECL through an assessment of quantitative and qualitative factors. The estimate of the ECL is arrived at using an internally developed model, based on default probabilities ("PD"), loss given default ("LGD") rates, exposure at default ("EAD"), staging classification criteria, expected life of the exposure and EIR. A key component of ECL methodology is the appropriate segmentation of the portfolio, based on common risk factors within the group of loans.

The Bank uses a 'three-stage' model for assessment of ECL based on changes in credit risk since origination.

Stage 1 includes financial instruments that have not had a significant increase in credit risk since origination or that have low credit risk at the reporting date. For these assets, 12-month ECL are recognized. 12-month ECL are the ECL that result from default events that are possible within 12 months after the reporting date.

Stage 2 includes financial instruments that have had a significant increase in credit risk since origination but are not credit impaired. For these assets, lifetime ECL are recognized. Lifetime ECL comprises the ECL that result from all possible default events over the expected life of the financial instrument.

Stage 3 includes financial assets that are credit impaired at the reporting date. For these assets, lifetime ECL are recognized. ECL is assessed based on estimates of recovery from the borrower under future scenarios.

Measurement of ECL

The measurement of ECL is the product of the instrument's PD, LGD, and EAD discounted to the reporting date. The calculation horizon is the primary difference for Stage 1 and Stage 2 ECL for performing financial assets. Stage 1 estimates project PD, LGD and EAD over a maximum period of 12 months while Stage 2 estimates project PD, LGD and EAD over the remaining lifetime of the instrument.

- PD measures the likelihood that a borrower, with an assigned risk rating, will impair/ default within a defined time horizon.
- EAD measures the expected exposure on a facility in the event of a borrower's default.
- LGD measures the severity of loss on a facility in the event of a borrower's default.

Forward-looking information

The estimation of ECL for each stage and the assessment of significant increases in credit risk consider information about past events and current conditions as well as reasonable and supportable forecasts of future events and economic conditions. The estimation and application of forward-looking information requires significant judgment.

Macroeconomic factors

An ECL estimate is produced for each individual exposure. Relevant parameters are modeled on a collective basis using portfolio segmentation that allows for appropriate incorporation of forward looking information. To reflect other characteristics that are not already considered through modelling, expert credit judgment is exercised in determining the final ECL. For its corporate and commercial banking portfolio, the Bank relies on external data for estimating forward looking PDs such as annual one-year observed default rates, annual GDP growth rate and Oil prices. For its residential mortgage portfolio, the Bank uses quarterly one-year observed default rates obtained from external sources and House Price Index (HPI) data. The inputs and models used for calculating ECL may not capture all the risks inherent in the financial assets and to reflect this, qualitative adjustments or overlays may be made as temporary adjustments using expert credit judgment. These approaches have been designed to maximize the available information that is reliable and supportable for each portfolio and may be collective in nature.

Multiple forward-looking scenarios

IFRS 9 also requires that multiple scenarios be created for estimation of future PDs and a probability weighted average PD be used for the estimation of ECL. In this regards, the Bank creates three scenarios for PD: Base, Optimistic and Pessimistic. The base scenario represents the most likely outcome. The optimistic and pessimistic scenarios are set by adjusting our base projections to construct reasonably possible scenarios that are more optimistic and pessimistic, respectively. Similarly, for its corporate and commercial banking portfolio, the historical default data is not sufficient in creating an LGD estimate based on historical experience, the Bank uses three LGD scenarios (i) stress asset cover scenario, (ii) Basel LGD scenario, (iii) distress scenario to estimate LGD on a case by case basis.

Assessment of Significant Increase in Credit Risk (SICR)

At each reporting date, the Bank assesses whether there has been a significant increase in credit risk for exposures since initial recognition. The assessment of a significant increase in credit risk ("SICR") is carried out on a relative basis. To assess whether the credit risk on a financial asset has increased significantly since origination, the Bank compares the risk of default occurring over the expected life of the financial asset at the reporting date to the corresponding risk of default at origination, using key risk indicators. IFRS 9 contains a rebuttable presumption that instruments which are 30 days past due have experienced a significant increase in credit risk. The Bank does not rebut this presumption. Financial assets can move in both directions through the stages of the impairment model and will allow credit risk of financial assets to move back to Stage 1 if increase in the credit risk since origination reduces and is determined to be no longer significant.

Expected life

The Bank considers the maximum contractual period over which it is exposed to credit risk. All contractual terms are considered when determining the expected life, including extension and rollover options. For certain revolving credit facilities that do not have a fixed maturity and where credit losses would not be mitigated by management actions, the expected life is estimated based on the period over which the Bank is exposed to credit risk. For term lending products, the period till contractual maturity is considered as the expected life. For revolving products, expected life is analyzed based on historical experience of the product.

Presentation of allowance for credit losses in the Statements of Financial Position

- Financial assets measured at amortized cost: as a deduction from the gross carrying amount of the financial assets;
- Debt instruments measured at fair value through other comprehensive income: no allowance is recognized in the Statements of Financial Position because the carrying value of these assets is their fair value. However, the allowance determined is presented in the Accumulated other comprehensive income;
- Off-balance sheet credit risks include undrawn lending commitments, letters of credit and letters of guarantee: as a part of accounts payable and other liabilities.

Modified financial assets

An assessment is made to determine if the existing financial asset should be derecognized whenever the terms of a financial asset are modified or an existing asset is replaced. The date of origination continues to be used to determine SICR whenever a modification does not result in derecognition. Where a modification results in derecognition, the new financial asset is recognized at its fair value on the modification date.

Contractual terms of financial assets may be modified for commercial or credit reasons. The terms of a performing asset may be modified to provide market pricing to borrowers. Financial assets may be modified for credit reasons and the contractual terms modified to grant a concession to a borrower due to the borrower experiencing financial difficulty.

If the modifications to the contractual terms (eg. interest rate, authorized amount, term, or collateral) are considered substantial, it will result in derecognition of the original asset. The original financial asset is derecognized and the new financial asset is recognized at fair value. The difference between the carrying value of the derecognized asset and the fair value of the new asset is recognized in the Statements of Comprehensive Income.

Where a modification of the terms does not result in derecognition of the financial asset, the gross carrying amount of the modified asset is recalculated based on the present value of modified cash flows which are discounted at the original EIR. Any resulting gain or loss from such modification is recorded on the provision for credit losses line in the Statements of Comprehensive Income.

Definition of default

The definition of default used in the measurement of ECL and the assessment to determine movement between stages is consistent with the definition of default used for internal credit risk management purposes. A default is considered to have occurred with regard to a particular obligor when either or both of the two following events have taken place:

- The Bank considers that the obligor is unlikely to pay its credit obligations in full, without recourse to actions such as realizing security (if held).
- The obligor is past due more than 90 days on any material credit obligation.

Write-off policy

A write-off is an accounting treatment that recognizes the reduced value of an impaired asset. A write off occurs upon the realization that an asset no longer can be converted into cash or has no market/economic value. A decision to write-off a loan will be taken based on the specific circumstances of each case. A loan can be written off when there has been a marked deterioration in the financial affairs of the Borrower/Obligor, such that there is no longer reasonable assurance of timely collectability of principal or interest.

The following table shows the Stage 1 and Stage 2 allowances by industry as at December 31, 2024:

	Amount in 000s CAD
Industries	Stage 1 and 2 allowances
Residential mortgages	3,050
Personal loans	80
Total Retail Loans	3,130
Accommodation and food services	144
Admin & Support, Waste Mgmt and Remediation	393
Arts, entertainment and recreation	-
Construction	140
Educational services	34
Energy	-
Finance & Insurance	90
Government & Sovereign	-
Health care and social assistance	55
Information and Cultural Industries	5,026
Manufacturing	2,325
Mining, Quarrying and Oil & Gas Extraction	14
Professional, Scientific and Technical Services	62
Real Estate and Rental & Leasing	76
Retail Trade	321
Transportation & Warehousing	33
Utilities	154
Wholesale Trade	1,446
Service-Others	-
Others	-
Total Corporate & Commercial Loans	10,313
Total Loans	13,443

The following table shows the movement of Stage 1 and Stage 2 allowances during the year ended December 31, 2024:

	CAD in 000's
Opening Balance (January 1, 2024)	16,552
Write-off during the year	-
Provisions/ (Write-back of excess provisions) made during the year, net ¹	(3,109)
Closing balance (December 31, 2024)	13,443

¹ Provisions/ (Write-back of excess provisions) during the year during the year excludes net charge back of CAD 1,079 on undrawn commitments and other credit

instruments.

The following table shows the geography wise distribution of Stage 1 and Stage 2 allowances ² based on country of risk as at December 31, 2024:

	CAD in 000's
Canada	10,609
India	3
Others	2,831
Total	13,443

² excludes CAD 1,047 on undrawn commitments and other credit instruments.

The following table presents the gross exposure and Stage 3 allowances for credit losses in respect of impaired loans as at December 31, 2024:

Amount in 000s CAD			
	Gross outstanding amount	Allowances	Net carrying amount
Non-mortgage loans			
To individuals for non-business purposes	28	19	9
Others	9,984	9,984	-
Mortgage loans			
Residential	21,019	2,074	18,945
Non-residential	-	-	-
Total	31,031	12,077	18,954

The following table shows the gross exposure and Stage 3 allowances in respect of impaired loans by geography based on the location of ultimate risk as at December 31, 2024:

Amount in 000s CAD			
	Gross outstanding	Allowances	Net carrying amount
Canada	21,047	2,093	18,954
India	9,984	9,984	-
Others	-	-	-
Total	31,031	12,077	18,954

The following table shows the gross exposure and allowances for credit losses in respect of impaired loans by industry as at December 31, 2024:

Amount in 000s CAD

Industries	Gross Outstanding Amount	Allowance for credit losses	Net Amount
Residential mortgages	21,019	2,074	18,945
Personal loans	28	19	9
Total Retail Loans	21,047	2,093	18,954
Accommodation and food services	-	-	-
Admin & Support, Waste Mgmt and Remediation	-	-	-
Agriculture, forestry, fishing and hunting	-	-	-
Arts, entertainment and recreation	-	-	-
Construction	7,195	7,195	-
Educational services	-	-	-
Finance & Insurance	-	-	-
Health care and social assistance	-	-	-
Information and Cultural Industries	-	-	-
Manufacturing	2,789	2,789	-
Mining, Quarrying and Oil & Gas Extraction	-	-	-
Professional, Scientific and Technical Services	-	-	-
Real Estate and Rental & Leasing	-	-	-
Retail Trade	-	-	-
Transportation & Warehousing	-	-	-
Utilities	-	-	-
Wholesale Trade	-	-	-
Total Corporate & Commercial Loans	9,984	9,984	-
Total Loans	31,031	12,077	18,954

The following table shows the movement in impaired loans for the year ended December 31, 2024:

	Amount in 000s CAD
Gross Loans	
Opening Balance (January 1, 2024)	21,003
Additions during the year	15,434
Reductions during the year	(5,406)
Closing balance (December 31, 2024)	31,031
Net Loans	
Opening Balance (January 1, 2024)	8,615
Additions during the year	13,172
Reductions during the year	(2,833)
Closing balance (December 31, 2024)	18,954

The following table shows the movement of allowances on impaired loans for the year ended December 31, 2024:

	Amount in 000s CAD
Opening Balance (January 1, 2024)	12,388
Net provisions made during the year	1,677
Write-off during the year	(2,795)
Foreign exchange movements	807
Closing balance (December 31, 2024)	12,077

The following table shows the Stage 3 allowances by industry accounted in the statements of comprehensive income for the year ended December 31, 2024:

Industries	Amount in 000s CAD
Residential mortgages	1,748
Personal loans	77
Total Retail Loans	1,825
Accommodation and food services	-
Admin & Support, Waste Mgmt and Remediation	
Arts, entertainment and recreation	-
Construction	-
Educational services	(148)
Finance & Insurance	
Government & Sovereign	
Health care and social assistance	
Information and Cultural Industries	
Manufacturing	-
Mining, Quarrying and Oil & Gas Extraction	-
Multiproduct conglomerates	
Professional, Scientific and Technical Services [#]	
Real Estate and Rental & Leasing	
Retail Trade	
Transportation & Warehousing	
Utilities	
Wholesale Trade	
Total Corporate & Commercial Loans	(148)
Total	1,677

e) Securitization

The Bank's primary objective of securitization activities is to increase the efficiency of capital and enhance the return on capital employed by diversifying the sources of funding.

The Bank has entered into securitization arrangements in respect of its originated and purchased (originated by third parties) mortgages, to issue National Housing Act Mortgage-backed Securities ("NHA-MBS") and also participates in Canada Mortgage Bonds ("CMB") program as a seller. The NHA MBSs are backed by pools of amortizing residential mortgages insured by the Canada Mortgage and Housing Corporation ("CMHC") or approved third party insurers. The CMB, guaranteed by CMHC, is a semi-annual coupon, bullet-maturity bond. CMBs are issued by a special purpose trust, known as Canada Housing Trust.

For mortgages securitized and sold into the CMB program, the Bank retains substantially all the risks and rewards, comprising primarily prepayment risk related to ownership of these mortgages and hence, these mortgage securitizations do not qualify for derecognition accounting under IFRS 9. For mortgages that are securitized and the resulting MBS from which are sold outside of the CMB program, the Bank has determined that it neither transfers nor retains substantially all the risks and rewards associated with the ownership of these mortgages. However, the Bank retains control over these mortgages and hence, it continues to recognize the mortgages securitized. For all mortgage securitizations, the amounts received through securitization and sale are recognized as "Secured borrowings".

As required under the CMB program, the Bank, as an issuer, has undertaken to remit monthly to the Central Payor and Transfer Agent (the "CPTA") the payments of principal and interest accrued and due on the mortgage loans in the pools. The Bank has also undertaken to make the payments to the CPTA on the due dates even if the corresponding amounts have not been received and collected by the Bank in respect of the pools.

The Bank did not securitize any of its assets except the residential insured mortgages under NHA-MBS and CMB programs as an originator during the year ended on December 31, 2024. However, such securitization is not subject to a securitization framework under the CAR Guideline. Accordingly, these securitized insured mortgages are risk-weighted as per the standardized approach for credit risk.

The following table shows the amount of assets intended to be securitized during the year in the banking book as at December 31, 2024:

	Amount in CAD '000s
Amount of assets intended to be securitized within a year	132,500
Of which:	
Amount of assets originated within a year before securitization	132,500

The Bank did not hold any retained or purchased securitization exposures in its trading or banking book as at December 31, 2024 and accordingly there are no disclosures to be provided.

4. Operational Risk

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. This definition includes legal risk, but excludes strategic and reputational risk.

The Bank has developed and implemented an Operational Risk Management Policy, which defines the guidelines adopted by the Bank towards minimizing losses due to process failures, product design flaws that can expose the Bank to losses due to fraud, impact of failures in technology/systems and continuity of Banking operations in contrary conditions.

The Bank has also developed and implemented an Information Security Policy. The policy gives direction towards development, maintenance and review of Information Security (IS) standards and procedures adopted by the Bank across people, process and technology. The policy endeavors to ensure compliance with all internal and regulatory IS requirements, including customer data protection.

The senior management of the Bank is responsible for establishment and maintenance of an adequate and effective system of internal controls, a measurement system for assessing the various risks of the Bank's activities, a system for relating risks to the Bank's capital level appropriate methods for monitoring compliance with laws, regulations and supervisory and internal policies. The senior management reports to the Board on these issues. The Bank has implemented its risk and control self assessment approach to identify and ensure effective control of its operational risks.

The Bank has developed and implemented a Business Continuity Plan ("BCP"). This plan is designed to facilitate continuity in critical business operations in the event of a disaster or an emergency situation. The BCP has been formulated on the basis of a business impact analysis carried out for the individual groups involving identification of critical activities and determination of their recovery time objectives.

The Bank has outsourced certain activities in the interest of cost and process efficiencies, including mid-office operations for treasury and corporate banking, information technology, corporate operations and trade finance operations to the Parent, terms of which are governed through a master service level agreement ("SLA") and specific SLAs. All these activities are closely monitored under the Third Party Risk Management Policy with regular monitoring of SLA performance dashboards. Material performance shortfalls within these SLA's are taken up with the Parent Bank and the same is reported to management and Board level committees.

The Bank has developed and implemented a Third party risk management Policy to mitigate third party risks and ensure the application of a standardized approach for all third party arrangements entered into by the Bank. All proposed arrangements are assessed for their level of criticality and risk prior to onboarding. For all such arrangements deemed to be high critical, a detailed assessment is conducted and the proposal is approved by the Non-Financial Risk Committee. The performance of high critical arrangements are periodically reviewed and assessment reports are presented to the Third party Sub-Committee.

Operational risk incidents are reported regularly and transactions resulting in losses are routed through operational risk account. Root cause analysis is carried out for the significant operational risk incidents (beyond the threshold limits) reported and corrective actions are incorporated back into respective processes. The Bank has implemented incident reporting process, which facilitate capturing of operational risk incidents by the employees of the Bank.

The operational risk losses and incident analysis are submitted to the Risk Committee and to the Board on a periodic basis. Operational risk exposures (risk and control self-assessment results, operational risk incidents analysis and key risk indicators) are monitored by the NFRC on a regular basis and reported to the Senior Management in the form of dashboards on a periodic basis.

In keeping with the Bank's enterprise-wide approach for managing Regulatory and Compliance Risks, the Bank has implemented a Regulatory Compliance Management ("RCM") Framework. The Framework applies to every aspect of the Bank's operations and activities without exception. The Bank recognizes the risk of legal and regulatory sanctions, material financial loss, and loss to reputation that it may suffer in the event of non-compliance with any of regulatory requirements. The Bank has implemented a formal risk assessment methodology which outlines the overall Regulatory Risk management process. This methodology uses international standards and best practices including the COSO Internal Control Framework and COSO ERM Integrated Framework, as guidelines.

The Bank has various insurance coverage in place and same are being reviewed on an annual basis to ensure that appropriate protection is in place as per regulatory requirements. These insurance coverages protect the Bank against these claims but not limited to negligence in the course of the Bank's performance, loss through forgery or acceptance of counterfeit or altered securities, damages to Bank's property, legal action by third party etc.

Group risk management framework

The Bank is aligned with the Parent's risk management framework, which has been developed in order to identify, evaluate and manage key risks on a worldwide basis. The framework is applicable to all overseas banking entities of the Parent. The policies applicable to the Bank are formulated in consultation with the Risk Management Group of the Parent and are independently reviewed and approved by the Bank's Board.

The Bank has adopted the Simplified Standardized Approach (SSA) in determining its operational risk capital requirement. The capital charge and the corresponding RWA for operational risk as at December 31, 2024 were CAD 20,736 and CAD 259,200 respectively.

5. Market Risk

Market risk is the uncertainty of earnings faced by the Bank as a result of volatility in market factors (i.e., interest rates, currency exchange rates, market liquidity and asset prices). Market risk events may impact the valuation of investments and the net interest income and net interest margin resulting in an impact on the profit and loss account. The policies approved by the Board for addressing market and liquidity risks are the Liquidity Management Policy ("LMP"), Market Risk Management Policy ("MRMP") and Liquidity Contingency Plan ("LCP").

The MRMP covers the policies governing overnight Treasury investments as well as long-term investments, Treasury organization structure, authorization, product guidelines, limits, classification and valuation norms, audit control and reporting.

The Board has delegated the responsibility for market-risk management to the RC and the ALCO within the broad parameters laid down in the MRMP. The ALCO considers various Investment and Treasury operations matters, implementation of risk mitigation measures, and recommends major policy changes governing Treasury activities to the RC. The Committee reviews adherence to OSFI market-risk requirements as well as internal control guidelines and limits. The ALCO ensures that the Bank's balance sheet is managed in accordance with the risk parameters/ prudential limits stipulated by the MRMP. Also, independent control groups have been formed, with clear functional separation, including:

- Front Office;
- Monitoring and control i.e. Treasury Securities and Services Group ("TSSG"); and
- Risk Management.

The Market Risk Management Group with inputs from the Global Market Risk Management Group recommends changes in risk policies and controls and the processes and methodologies for quantifying and assessing market risks. The TSSG, which is independent of business groups, carries out an independent verification of transactions entered into by the Front Office prior to confirmation of each transaction and associated reporting requirements. TSSG also monitors and reports the various risk limits set through the LMP and the MRMP.

The MRMP sets out the deal-size limits for various products. These limits have been set up based on a hierarchy of executives. Various coherence checks are inserted in the system for ensuring that the appropriate deal-size limits are enforced.

The Bank has put in place a Board-approved comprehensive limit framework (as included in the MRMP) to prudently measure and manage the market risk profile of the Bank. The material limits include Earnings at Risk ("EaR") limits, Duration of Equity ("DoE") limits, net overnight open position limit, investment limits, hedge limits, transaction size limits, counterparty limits, deal size limits, Foreign Exchange Value at Risk limit, daily MTM volatility triggers, and cumulative stop loss triggers. The TSSG monitors compliance with various internal and regulatory limits and guidelines. The Bank reports exposures and compliance to limits on a monthly basis to ALCO and on a quarterly basis to RC.

Further, the Bank does not maintain any proprietary trading book. It manages the interest rate and price risk on its balance sheet within Board approved MTM volatility trigger for funding swaps & other portfolios and cumulative stop loss trigger for treasury products/derivatives (excluding forex swaps) of CAD 2,000 each and CAD (8000) respectively. The average and peak utilization of the MTM volatility trigger for funding swaps based on month-end business days during CY2024 was CAD 705 and CAD 1,365 respectively and for other portfolios the average and peak utilization of MTM volatility trigger was CAD 1,060 and CAD 1,203 respectively. With respect to Bank's unhedged currency positions, the Bank had a limit on NOOP of USD 15,000,000; its average and peak utilization based on month-end business days during CY2024 were USD 5,597,067 and USD 8,236,120 respectively. Further, the average and peak utilization of the Cumulative Stop loss trigger for treasury products/derivatives (excluding forex swaps) based on month- end business days during CY2024 was CAD (291) and CAD (1,167) respectively.

The key risks to which the Bank is exposed from a market risk perspective relate to interest rate risk, foreign exchange risk, liquidity and funding risk.

Market risk linkage to the balance sheet:

The following table provides a breakdown of the Bank's balance sheet into assets and liabilities and the primary risks those are exposed to:

Amount in CAD '000s			
	Primary risk	December 31, 2024	December 31, 2023
Assets subject to market risk			
Interest bearing deposits with banks	Interest rate, Foreign exchange	72,518	44,971
Derivatives	Foreign exchange, Interest rate	6,635	25,867
Investment securities	Interest rate	456,993	613,462
Loans, net of allowance for loan losses	Foreign exchange, Interest rate	4,711,699	5,286,131
Other assets	Foreign exchange	41,279	46,841
Assets not exposed to market risk	N/A	153,258	91,056
Total assets		5,442,383	6,108,328
Liabilities subject to market risk			
Deposits from customers	Interest rate, Foreign exchange	2,922,167	3,316,649
Derivative liabilities	Foreign exchange, Interest rate	42,968	9,796
Deposits from banks	Interest rate	13,784	11,016
Securitized borrowing	Interest rate	1,793,100	2,214,254
Other liabilities	Foreign exchange, Interest rate	69,345	5,176
Liabilities not exposed to market risk and Shareholder's Equity	N/A	601,109	551,437
Total liabilities		5,442,383	6,108,328

6. Structural Interest Rate Risk

Interest rate risk is defined as the exposure of a bank's financial condition to adverse movements in interest rates. Earnings from interest-sensitive investments and the overall value of the investment portfolio will be impacted by changes in interest rates. The MRMP currently sets out the measurement process to include the use of re-pricing gap reports and estimation of the sensitivity of the Bank's net interest income to a 100 bps adverse change in the level of interest rates, defined as EaR. The EaR for the Bank over a 4-quarter horizon for an adverse 100 bps parallel shift in interest rates shall not exceed 3% of the Bank's current Tier 1 capital or CAD 10,000 (whichever is lower). At December 31, 2024, the actual limit utilization was CAD 3,600 i.e. 0.70% of the Bank's current Tier 1 capital. The peak EaR during CY2024 was 0.83% (CAD 3,613).

Further, the Bank uses various measures, including DoE, which takes into consideration duration and value of both assets and liabilities. DoE is a measure of interest rate sensitivity, which indicates how much the market value of equity would change if interest rates change by 1%. The Bank has set a maximum limit of (+/-) 4% of Tier 1 capital given a 100 bps change in interest rates. As at December 31, 2024, the actual DoE was 1.11 and EVE was at CAD 6,688, based on which the actual limit utilization was 1.31% of Tier 1 capital. The peak DoE during CY2024 was 1.66 and EVE was CAD 9,662, based on which the actual limit utilization was 2.02% of Tier 1 capital.

The MVE Sensitivity measures the impact of a specified interest rate shock to the change in the net present value of the Bank's banking book assets and liabilities. The NII Sensitivity measures the NII change over a twelve-month horizon for a specified change in interest rates for banking book assets and liabilities assuming a constant balance sheet over the period.

The following table shows the potential before-tax impact of an immediate and sustained 100 bps increase or decrease in interest rates on the Bank's MVE and NII. No interest rate floors are applied to the decrease in rates scenario.

Pre-tax impact of:			100 bps upwards movement	100 bps downwards movement
December 31, 2024	MVE sensitivity	CAD	(6.53)	6.69
		USD	0.18	(0.09)
		Overall	(6.53)	6.69
	NII sensitivity	CAD	1.85	(1.85)
		USD	1.76	(1.76)
		Overall	3.60	(3.60)
December 31, 2023	MVE sensitivity	CAD	(6.00)	6.00
		USD	(0.88)	0.88
		Overall	(6.88)	6.88
	NII sensitivity	CAD	1.36	(1.36)
		USD	1.50	(1.50)
		Overall	2.86	(2.86)

The Head of Treasury is responsible for managing the interest rate risk of the Bank. Interest rate risk is subject to periodic review by ALCO and the RC.

7. Foreign Exchange Risk

The foreign exchange risk arises due to positions in non-Canadian denominated currencies, which in turn arises from assets and liabilities in those currencies. The risk originates as a result of the impact on revenue due to the potential revaluation of non-Canadian assets and liabilities. The aggregate net overnight open exchange position across all foreign currencies as per the MRMP shall not exceed USD 15,000,000. Generally, Value-at-Risk ("VaR") is a tool for measuring market risk on trading positions. It seeks to ascertain the maximum loss on a portfolio at a given confidence level over a specific holding period. As per the MRMP, a VaR limit (99%-1day) of USD 250,000 has been set on the aggregate overnight open position and the actual VaR as at December 31, 2024 was USD 37,650. The Bank uses one-year data to compute VaR and there have been no breaches of the VaR limit in the year ended December 31, 2024.

8. Liquidity and Funding Risk

Liquidity risk relates to the potential difficulty in accessing financial markets in order to meet payment obligations. Liquidity risk is the potential for losses that could be incurred from holding insufficient liquidity to survive a liquidity contingent stress event, whether name-specific, market-specific or combined (market and name specific) scenarios. It includes the risk of unexpected increases in the cost of funding the assets, and the risk of being unable to access the market or to liquidate investments in a timely manner at a reasonable price.

The Bank has established the LMP to manage the liquidity and funding risk for the Bank. The Policy details the Bank's tolerance for assuming liquidity risk and methods for identification, measurement, monitoring, controlling and reporting liquidity risk and is reviewed by the RC of the Board of Directors on an annual basis. The ALCO of the Bank formulates and reviews strategies and provides guidance for management of liquidity risk within the framework laid out in the LMP.

The goal of liquidity risk management is to be able, even under adverse conditions, to meet all liability repayments on time and to fund all investment opportunities by raising sufficient funds either by increasing liabilities or by converting assets into cash expeditiously and at reasonable cost.

The LMP captures the details of the risk appetite framework and risk capacity of the Bank. The Bank expresses its liquidity risk appetite through a range of limits across liquidity gaps covering the entire spectrum of the balance sheet, including limits specified in major currencies (Canadian and U.S. dollars). The Bank also monitors liquidity risk through liquidity ratios and regulatory reports such as Net Cumulative Cash Flows (NCCF) and Liquidity Coverage Ratio (LCR) on a periodic basis.

The LMP also captures the details of stress test scenarios (Bank-specific, Market-specific and Combined scenarios) for different short-term stress horizons. Under each of the stress scenarios, certain factors like deposits, unfunded authorizations from corporate, mortgage and other retail commitments, non-fund commitments like stand by letter of credit (SBLCs) are subjected to varying degrees of severity to estimate the outflows. These stressed outflows are expected to be offset using appropriate funding plan. Such assessments are carried out for 30-day, 60-day and 90-day stress horizons.

The Bank proactively manages liquidity risk as a part of its ALM activities. The Bank uses various tools for measurement of liquidity risk including the statement of structural liquidity ("SSL"), liquidity ratios and stress testing through scenario analysis.

The Bank has also framed a LCP, which serves as a framework for early identification and calibrated action in the event of tight liquidity conditions. The LCP includes various indicators which are monitored regularly, and lays down the mechanism for escalation, remedial action and crisis management until return to normalcy.

The Treasury team manages the market risk of treasury positions and the day-to-day liquidity of the Bank. It is subject to periodic review by Internal Audit, and is approved by the Board of Directors. Treasury ensures that adequate liquidity is maintained at all times through systematic funds planning and maintenance of liquid investments. The Bank at all times seeks to maintain diversification in the sources and tenor of its funding. The Bank's liabilities are largely drawn from retail deposits, commercial deposits, other financial institutions, inter bank borrowings, securitizations and other funding sources which may become available from time to time. In addition, liquidity stress testing analysis as per the LCP are regularly performed to assess the Bank's ability to withstand extreme crisis situation.

The Senior Management also regularly monitors the liquidity positions taken on a daily basis. The ALCO and the RC undertake a periodic review of the market risk and liquidity position of the Bank. The liquidity position of the Bank including utilization against gap limits and compliance with liquidity ratios as well as results of stress tests are presented to ALCO on a monthly basis and to the RC on a quarterly basis. It may be noted that as at December 31, 2024, the Bank maintained Liquidity Coverage Ratio ("LCR") of 279% against a regulatory minimum of 100%.

9. Credit Valuation Adjustment Risk

Credit Valuation Adjustment (CVA) refers to fair value adjustment to reflect counterparty credit risk in the valuation of derivatives with a given counterparty. CVA is measured in accordance with Bank's risk management policies. The Bank ensures regular monitoring and reporting of CVA risk.

The Bank has adopted reduced version of basic approach BA-CVA methodology for calculating CVA capital following the implementation of revised OSFI Capital Adequacy Requirements (CAR) in Q1 2024.

V. Remuneration Process Disclosure

The Bank follows a conservative and comprehensive approach for Compensation Management.

1. Governance & Board Involvement

The Board Governance & Remuneration Committee ("BGRC") of the Bank is responsible for the overview of the Compensation processes, policies and practices. Further, the BGRC is also mandated with finalizing remuneration of all Management Committee members, including the President & CEO of the Bank.

The BGRC reviews and approves all compensation decisions of the Bank as submitted by the Human Resources Department. This is in line with current regulatory recommendations with regard to the BGRC's involvement in approving remuneration for Directors and the Bank's Senior Management.

The BGRC reviews the compensation strategy adopted by the Bank in the context of the regulatory environment and the changing market dynamics at periodic intervals.

The BGRC members do not hold any executive position with the Bank. The BGRC comprises of members who chair the Audit and Conduct Review Committees of the Bank.

2. Performance and Pay

The Bank follows the principles of a balanced scorecard in designing its performance management system. An appropriate focus is given to goal sheets to ensure a balance of financial goals with non-financial goals. The non-financial goals cover relevant areas of customer service, process improvement, adherence to both risk and compliance norms and employee capability building.

Staff engaged in the control functions including Compliance, Risk, Finance, Audit and others do not carry business profit targets in their respective goal sheets and hence, their compensation is dependent on achievement of key results in their respective domain.

Performance bonus is strongly linked to corporate performance and individual performance. For employees carrying business performance targets, business performance is also looked at along with corporate performance and individual performance in order to determine the quantum of performance bonus. The Bank's revenue target is approved by the Board, which periodically reviews the performance against the target and the means adopted for performance.

3. Design and Structure of Compensation

Compensation is aligned to both financial and non-financial indicators of performance. An appropriate focus is given to performance on parameters like customer service, process improvement, adherence to risk and compliance norms and employee capability building.

Further, employee compensation takes into account a balanced mix of external market pay and internal equity considerations. The compensation outlay is based on cost and income ratios for the Bank.

The Bank has a judicious and prudent approach to compensation and does not use compensation as the only lever to attract and retain employees. No single business or functional leader determines the compensation structure. Good governance dictates a BGRC-approved and supervised compensation approach.

The Bank does not encourage any kind of guaranteed bonus.

The Bank follows a bonus distribution method based on individual performance levels. The performance based bonus distribution matrix is determined by the BGRC and the Bank does not follow a business-wise bonus pool concept. No single individual determines the quantity of bonus available to a person. The performance level of an individual is decided by skip levels and this determines in each case the individual's payout as a percentage of one's base salary.

The BGRC reviews the performance and approves the rate of bonus to be paid in each case, the increments to be given to the President & CEO and to members of the Management Committee and also the bonus rates to be paid to various levels as per the performance of the Bank, business group and each individual employee.

The BGRC approves the threshold organisational performance gates for bonus to be paid. The Committee may also fix the annual bonus as nil if the data and analysis show that the

4. Deferral of Variable Component Including Risk Adjustments

The Bank is not a listed company in Canada and its employees may be granted options under the Employee Stock Options Scheme (ESOS) of ICICI Bank Limited (the Parent Bank). This scheme is approved by the shareholders of ICICI Bank Limited.

Total compensation is a prudent mix of fixed pay and variable pay. The variable pay is higher at senior levels and lower at junior levels. The variable compensation will consist of performance bonus and Employee Stock Options ("ESOS").

At senior levels, the Bank pays ESOS for a vesting period spanning three or more years. This is paid based on compliance with performance norms both in financial and non-financial areas and does not favour inappropriate risk-taking. As a result, this approach aligns senior management interests with those of the shareholders. All non-vested options lapse in the event of termination of the employment.

The ESOS program aims at achieving the twin objectives of aligning senior and middle management compensation to long-term shareholders' interests and the retention of employees. The ESOS program aims at aligning senior management behavior to the long-term view of the Bank's performance and also to create individual stakes in the Bank's success.

The ESOPs granted by the Bank have a minimum one year vesting period, and thereafter vesting occurs (subject to meeting prescribed vesting criteria) as per vesting schedule on an annual basis over three or more years.

The Bank follows a conservative approach to cash bonus payouts. The quantum of bonus for an employee does not exceed 70% of the base salary and is paid on an annual basis. If the annual cash bonus is more than or equal to CAD value of INR 2,500,000, then 50% will be paid upfront and balance will be deferred equally over a period of three years.

The audited financial statements of the Bank also contain the requisite disclosures in respect of the remuneration paid to the key management personnel ("KMP"). KMP are those persons who have the authority and responsibility for planning, directing and controlling the activities of the Bank, directly or indirectly, and comprise the directors of the Bank, the Chief Executive Officer ("CEO") and all direct reports of the CEO. The definition of KMP in IAS 24 Related Party Disclosures, specifies a role and is not limited to a person. KMP include directors (both executive and non-executive) and other members of the management team with significant authority and responsibility for planning, directing and controlling the Bank's activities.

The following table summarizes the compensation paid to the KMP in respect of short-term and other post-employment benefits, during the year ended December 31, 2024:

	Amount in CAD 000s
Short-term employee benefits	3,074
Post-employee benefits	204
Total	3,278

The Parent grants stock options to the employees of the Bank under the Employee Stock Option Plan of the Parent. Personnel expenses include the cost of stock options granted to employees of the Bank, primarily KMP. Further to the reimbursement agreement entered into with the Parent, the cost of options granted on or after March 22, 2021 would be reimbursed to the Parent while no such reimbursements are to be made in respect of options granted prior to March 22, 2021.

Accordingly for the year ended December 31, 2024, \$3 (2023-\$38) has been credited to the paid-in capital in respect of options granted prior to March 22, 2021 and \$990 (2023 - \$906) have been expensed as the cost in respect of options granted on or after March 22, 2021. Further, as at December 31, 2024, an amount of \$764 (2023 - \$694) is payable to the parent bank as per the reimbursement agreement.