

# BLOMINVEST SAUDI ARABIA

## PILLAR 3- DISCLOSURES

31 DECEMBER 2014

## Table of Contents

|  |    |
|--|----|
| 1. Scope of Application:.....  | 4  |
| 1.1 Pillar I- Minimum Capital Requirements: .....                                  | 4  |
| 1.2 Pillar II –ICAAP .....   | 4  |
| 1.3 Pillar III –Market Discipline .....  | 5  |
| 2. Capital Structure: .....  | 5  |
| 3. Capital Adequacy:.....  | 7  |
| 3.1 Capital Adequacy Ratio and Minimum Capital Requirements: .....                 | 7  |
| 3.2 ICAAP:.....  | 8  |
| 4. Risk Management:.....   | 10 |
| 4.1 Risk Management practice at BLOMINVEST Saudi Arabia.....                       | 11 |
| 4.1.1 Risk Management Strategies and processes: .....                              | 11 |
| 4.1.2 Structure and Organization of Risk Management and Compliance function: ..... | 11 |
| 4.1.3 Scope and nature of risk reporting and measurement Systems.....              | 11 |
| 4.1.4 Policies and guidelines for monitoring and mitigating risks.....             | 14 |
| 4.2 Credit Risks.....  | 15 |
| 4.2.1 External Ratings: .....  | 17 |
| 4.2.2 Credit Quality Steps: .....  | 17 |
| 4.2.3 Credit risk Exposure:.....   | 17 |
| 4.2.4 Impairment, past due and provisions:.....                                    | 17 |
| 4.2.6 Risk Concentrations: .....   | 17 |
| 4.2.7 Credit Risk Exposures by credit Quality: .....                               | 18 |
| 4.3 Credit Risk Mitigation .....   | 19 |
| 4.4 Market Risk .....  | 19 |
| 4.4.1 Market Risk Management.....  | 20 |
| 4.4.1 Market Risk – Capital.....   | 20 |
| 4.6 Operational Risk.....  | 20 |
| 4.6.1 Operational Risk Management.....   | 20 |
| 4.6.2 Operational Risk Mitigation.....   | 20 |
| 4.6.3 Operational Risk Capital Charge .....  | 21 |
| 4.7 Liquidity Risk:.....   | 22 |
| 4.7.1 Liquidity Risk Management:.....  | 22 |
| 4.7.2 Stress Testing and Capital Planning .....                                    | 23 |
| 4.7.3. Risk Measures and Ratios: .....   | 23 |

|  |    |
|--|----|
| Appendix 1: Illustrative Disclosure on Capital Base .....                | 24 |
| Appendix 2: Illustrative Disclosure on Capital Adequacy .....            | 25 |
| Appendix 3: Illustrative Disclosure on Credit Risk's Risk Weight.....    | 26 |
| Appendix 4: Illustrative Disclosure on Credit Risk's Rated Exposure..... | 27 |
| Appendix 5: Illustrative Disclosure on Credit Risk Mitigation .....      | 29 |

## 1. Scope of Application:

In July 27 2008, BLOM Bank Group and its strategic regional partners in Saudi Arabia (Al-Fozan Holding, Al-Muhaidib Holding, Abdulaziz Al-Saghyir Commercial Investment Co. and Mr. Abdul Salam A. Al-Agil) were granted by the Capital Market Authority (CMA) a license (no 37/08094) to open and operate an investment firm in Saudi Arabia under the name of BLOMINVEST Saudi Arabia.

The PILLAR III disclosures contained herein relate to the audited financials of BLOMINVEST Saudi Arabia for the period ended December 31,2014.These are compiled in accordance with CMA's the minimum requirements for the annual market disclosure of information as referred to by Part 7 "Pillar III-Disclosure and Reporting" of the Prudential Rules.

### 1.1 Pillar I- Minimum Capital Requirements:

Pillar I sets minimum capital requirements to meet credit, market, and operational risk as contained in chapter 4 to 16 of the Prudential Rules.

BLOMINVEST Saudi Arabia uses the base case approach in the calculation of the capital requirement for Credit Risk, Market Risk, and Operational Risk.

### 1.2 Pillar II –ICAAP

The Internal Capital Adequacy Assessment Process is introduced under Pillar II of the prudential Rules, which is contained in Part6 (Article66) and Annex 9 of the Prudential Rules.

Pillar II requires AP's to perform a thorough review of all materials risks, extensive stress testing, strategic capital planning , the internal control framework and the roles and responsibilities of departments that are critical to the implementation of framework .

The purpose and objective of the ICAAP is to ensure that the methodology to calculate the internal capital requirements takes into account all the material risks faced by BSA and is reflective of the actual risk profile of BSA.

The ICAAP process was jointly conducted by BSA Risk and Finance Department and Group Risk Management Division of BLOM Bank S.A.L.

### 1.3 Pillar III –Market Discipline

Pillar III aims to provide a detailed and transparent reporting framework that enhances market discipline to operate as sharing of information facilitates assessment of the AP by others, including investors, analysts, customers, and rating agencies, which leads to an improved corporate governance.

The information provided here has been reviewed and validated by the Management and is in accordance with the rules in force at the time of publication, covering both the qualitative and quantitative items. BSA shall publish the Pillar III disclosures at its website [www.blominvestksa.com](http://www.blominvestksa.com).

## 2. Capital Structure:

BLOMINVEST Saudi Arabia capital base is formed of Tier I and Tier II. Tier I includes: share capital, proposed share capital increase, audited retained earnings as well as deduction of intangibles. Tier II includes: subordinated loan, revaluation reserves and any deductions needed to meet tier II capital limit (Tier II should be at a maximum of 50% of Tier I).

In 2013, there was a share capital increase of SAR 45 million. In 2014, there was a proposed share capital increase of SAR 100 million.

BLOMINVEST Saudi Arabia had a subordinated loan of SAR 37,500 thousands from BLOM Bank S.A.L. (Parent Bank) in 2011 that is expected to be settled after five years by June 2016. In 2013, BLOMINVEST Saudi Arabia had another subordinated loan of SAR 55,000 thousands from its Parent Bank as well having a five years maturity and that will be settled by end of year 2018.

Changes in fair value of available for sale financial investments (where negative) are translated into revaluation reserves and are included in Tier II capital.

As of December 2014, Tier I constitutes 80% of total capital base and Tier II forms the rest (20%). Along with the three projected years, Tier I is expected to increase and Tier II to decrease with the expected growth in net income and the settlement of the subordinated loan. By December 2017, Tier I is expected to constitute 89% of capital base and Tier II 11%, indicating the strength and quality of capital that BSA is expecting.

All amounts in '000

| Tier 1- Capital                             | Dec-14         | Dec-13         |
|---|----------------|----------------|
| Paid-up capital                             | 245,000        | 145,000        |
| Reserves ( other than revaluation reserves) | 2,153          |                |
| Audited retained earnings                   | 14,603         | (43,458)       |
| Goodwill and intangible assets (-)          | (153)          | (29)           |
| <b>Total Tier-1 capital</b>                 | <b>261,603</b> | <b>101,513</b> |

| Tier-2 capital                             | Dec-14        | Dec-13        |
|--|---------------|---------------|
| Subordinated loans                         | 51,500        | 92,500        |
| Cumulative preference shares               | 0             | 0             |
| Revaluation reserves                       | 4,618         | 6,396         |
| Deduction to meet Tier-2 capital limit (-) | 0             | (48,140)      |
| <b>Total Tier-2 capital</b>                | <b>56,118</b> | <b>50,757</b> |

|                           |                |                |
|---------------------------|----------------|----------------|
| <b>Total capital base</b> | <b>317,721</b> | <b>152,270</b> |
|---------------------------|----------------|----------------|

Please refer to Appendix 1 for the detailed disclosure on capital base.

### 3. Capital Adequacy:

BSA defines “Minimum Capital” as the resource necessary to cover unexpected losses and thus the Firm, maintains adequate level of capital to cover risks inherent in its business operations and to support current & future activities.

#### 3.1 Capital Adequacy Ratio and Minimum Capital Requirements:

The Firm is adequately capitalized with a Tier I capital ratio of 2.82 and a total capital ratio of 3.42 which is above CMA’s minimum regulatory requirement of 1.00.

Following table provides the Firm's capital adequacy ratio

| Particulars          | Dec-14 | Dec-13 |
|----------------------|--------|--------|
| Tier-1 Capital Ratio | 2.82   | 0.91   |
| Total Capital Ratio  | 3.42   | 1.36   |

The following table reflects the comparative analysis of capital numbers in 2014 & 2013.

All amounts in ‘000

| Particulars                        | Dec-14        | Dec-13         |
|------------------------------------|---------------|----------------|
| Tier 1- Capital                    | 261,603       | 101,513        |
| Tier-2 capital                     | 56,118        | 50,757         |
| Total capital base                 | 317,721       | 152,270        |
| <b>Minimum Capital Requirement</b> |               |                |
| Credit Risk                        | 86,768        | 105,904        |
| Market Risk                        | 1,140         | 1,594          |
| Operational Risk                   | 4,871         | 4,083          |
| <b>Total</b>                       | <b>92,779</b> | <b>111,581</b> |
| Capital Adequacy Ratio             | 3.42          | 1.36           |
| Surplus ( Deficit) in Capital Base | 224,942       | 40,689         |

Please Refer to Appendix 2 for the detailed disclosure on capital Adequacy.

### 3.2 ICAAP:

BSA capital management philosophy is aimed at maintaining an optimum level of capital to enable it to pursue strategies that build long-term shareholder value, whilst always meeting minimum regulatory capital and sufficient liquidity requirements. BSA has established an ICAAP framework (as illustrated in Figure below). The framework entails:

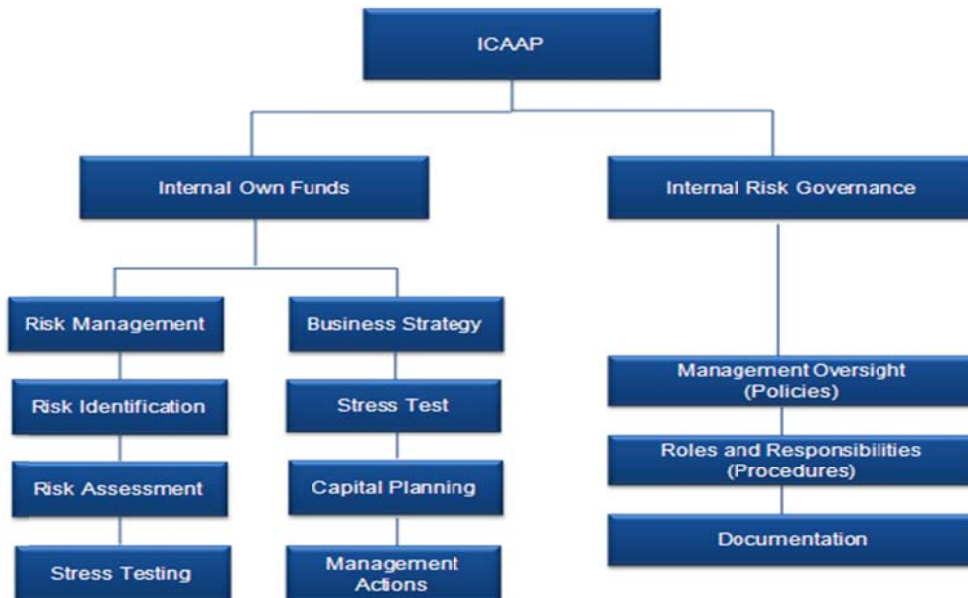
The formulation of business plan over a 3 year horizon (2015-2017) in line with BSA’s strategy;

The assessment and measurement of the material risks in BSA’s exposures;

The assessment of BSA governance, organization, policies and procedures and documentation;

Stress testing of BSA’s risks to assess its impact on capital requirements and the set financial targets in cases of stress events and scenarios; and

Regular reporting of the ICAAP results to Executive Committee, BOD and CMA.





BSA ICAAP framework consists of the following building blocks:

- 1- Internal own funds adequacy: calculating BSA's capital adequacy by taking into consideration Pillar I risks (market, credit and operational) and Pillar II risks (concentration, interest rate risk, other risks...) through the application of internal methods of risk assessment and buffer calculations.

To be able to reach this stage, BSA shall:

- a- Follow sound risk management practices;
- b- Identify the risks it is exposed to or might be exposed to in the future;
- c- Assess those risks;
- d- Apply stress test scenarios in order to assess the ability of BSA to weather such scenarios.

This would be reflected in the ICAAP by:

- a- Orienting BSA's business plan into a risk-forward looking perspective;
- b- Setting risk appetite limits in accordance with the BSA strategy and its risk-taking capacity;
- c- Developing a capital plan under normal business conditions and stressful situations;
- d- Elaborating contingency plans entailing management actions to be undertaken under severe business conditions to ensure alignment and restoration within BSA acceptable levels and regulatory limits.

- 2- Internal risk governance which consists of:

- a- BOD and Senior Management oversight;
- b- Assess risk governance organization and all related policies and procedures; and
- c- Documentation of the ICAAP throughout its phases.

BSA Senior Management will be responsible for monitoring the ICAAP framework through:

- a. Overseeing the capital requirements (both regulatory and internal) of BSA,
- b. Monitoring the capital adequacy level on a periodic basis and escalate through the CEO to the Executive Committee and BOD, if necessary;
- c. Evaluating the level and trend of material risks and their effect on capital levels;
- d. Evaluating the key assumptions used in the capital assessment measurement process; and
- e. Assessing the future capital requirements based on BSA reported risk profile and recommending the necessary adjustments to BSA's strategic plan, if required.

#### **4. Risk Management:**

BLOMINVEST Saudi Arabia has been applying a risk management framework which is a composite of policies, procedures, guidelines, risk limits and effective risk governance structure.

BLOMINVEST Saudi Arabia has its own policies and procedures concerning risk management (Risk Management Manual).

These policies and procedures outline the risk management control framework that allows the BSA to identify, assess, monitor, manage, mitigate and control exposure to all major risks inherent in its business activities. The purpose of the policies and procedures is to establish and communicate risk policy guidelines and control parameters related to risk and to direct activities conducted on behalf of BSA.

The risk management policies and procedures were formulated to assist BSA's Senior Management in the overall monitoring and control of the major risks arising from BSA's business activities. BSA risk management framework is based upon the premise that business managers understand the risks inherent in their activities, each department implements its own risk management controls. The risk management policies and procedures have provided the basis for the creation of a risk management infrastructure, thus facilitating the optimisation of stakeholder value, as well as meeting the emerging regulatory compliance and industry best practice standards.

## **4.1 Risk Management practice at BLOMINVEST Saudi Arabia**

### **4.1.1 Risk Management Strategies and processes:**

BSA has maintained the following minimum risk management standards in its risk management policies and procedures:

- Risks are well defined;
- Adequate and appropriate assessment of risks are done where relevant and feasible;
- Controls are effective and active throughout the relevant business periods;
- Measures are accurate; and
- Management of risks is proactive and integrated.

### **4.1.2 Structure and Organization of Risk Management and Compliance function:**

Senior Officer Risk & Financial Reporting shall prepare periodic reports to BSA General Management and send copies to BLOM Group Chief Risk Officer. Senior Officer Risk & Financial Reporting will report annually or as the need arises to the Board and the Excom on risk profile of BSA and on major risks affecting the Company.

Senior Officer Risk & Financial Reporting shall conduct general risk assessments to BSA's different departments and report its findings to Excom, copies of the report should be forwarded to BLOM Group Chief Risk Officer as well as BLOM Group Head of Audit.

Business line managers at BSA will be responsible for the day to day operational risk management at their departments and informing Senior Officer Risk & Financial Reporting of significant and/or emerging risks in their business activities.

The Internal Audit shall periodically review the risk management function at BSA.

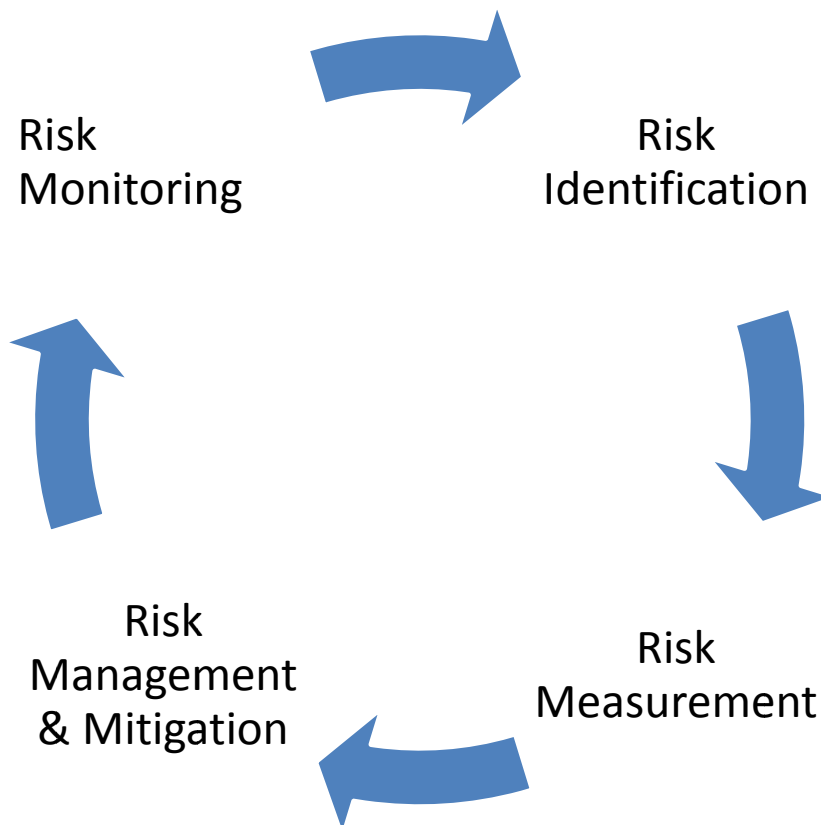
### **4.1.3 Scope and nature of risk reporting and measurement Systems**

Risk management seeks to monitor the business risks and to keep risks within acceptable limits. Effective risk management will allow BSA greater control in achieving an appropriate balance between risks BSA wishes to accept (at a price that is appropriate to that risk) and risks BSA wishes to mitigate. When risks are properly managed, the benefits to be gained from those risks can be maximized, by accepting, reducing, eliminating, mitigating, or transferring the risk associated with any activity.

The primary goal of risk management is to ensure that BSA's asset and liability profile, its trading positions, its credit and operational activities do not expose it to losses that could threaten the viability of BSA. Risk management helps ensure that risk exposures do not

become excessive relative to BSA’s capital position and its financial position.

In all circumstances, all activities giving rise to risk must be identified, measured, managed and monitored. Thus, risk management may be viewed as a “continuous cycle” which includes the following four cycles:



| Risk Identification   | Risk Measurement  | Risk Management & Mitigation   | Risk Monitoring   |
|---|---|--|---|
| <ul style="list-style-type: none"> <li>➤ Risks and sources of risks to which BSA is exposed should be identified &amp; defined.</li> <li>➤ BSA's "appetite" for risk should be described based on BSA business objectives.</li> </ul> | <ul style="list-style-type: none"> <li>➤ Measurement process should be comprehensive enough to cover all significant sources of risk exposure.</li> <li>➤ Measurement process should be responsive to the needs of the users of the information.</li> </ul> | <ul style="list-style-type: none"> <li>➤ Risk limits should be consistent with BSA policies and authorized exposures.</li> <li>➤ Risk management should ensure that operational activities do not expose BSA to losses that could threaten its viability.</li> <li>➤ Risk management should ensure that risks are mitigated to BSA's risk tolerance levels.</li> </ul> | <ul style="list-style-type: none"> <li>➤ Reports should provide relevant, accurate and timely information about risk exposures to management.</li> <li>➤ Individuals monitoring risks should be independent of those taking positions (incurring risks).</li> </ul> |

BSA's risk management is focused along 4 core steps, these are defined as follows:

Effective **risk identification** considers both internal factors (such as BSA the nature of activities, and quality of human resources, organizational changes and employee's turnover) and external factors (such as changes in the industry and technological advances) that could adversely affect the achievement of BSA's objectives.

The risk identification falls under the responsibility of the line managers, e.g. Human Resources Manager, who is responsible for the Human Resource function, is responsible for identifying human resource risks, the Directors of relevant business units for competitive risk in their area and so on.

Effective **risk measurement** will allow BSA to better understand its risk profile and most effectively target risk management resources.

Regular **risk management and mitigation** activities will offer BSA the advantages of quickly detecting and correcting deficiencies in the policies, processes and procedures for managing and mitigating risks. The frequency of monitoring must reflect the risks involved and the frequency and nature of changes in the operating environment.

BSA's **risk monitoring** will contain internal financial, operational, and compliance data, as well as external market information about events and conditions that are relevant for decision making. BSA's reports will be distributed to appropriate levels of management and to all areas of BSA on which areas of concern may have an impact. The reports will fully reflect any identified problem area and will motivate timely corrective action on outstanding issues. The reports will be analysed with a view to improve existing risk management performance as well as to develop new risk management policies and practices.

#### 4.1.4 Policies and guidelines for monitoring and mitigating risks

The Risk Management function will be responsible for the implementation of risk management within BSA, and for responding to and on significant risks that may emerge from time to time and is responsible for all risk management activities within BSA. The Risk Management function has the mandate to:

- Define BSA's risk appetite in a manner that is consistent with our overall business strategies;
- Draft risk policies, procedures and methodologies that are consistent with the Company's risk appetite;
- Manage the portfolio of risks throughout the organization;
- Ensure that the business conducted within BSA is consistent with the risk appetite of the Company;
- Propose credit risk, market risk and operational risk limits to the Excom for approval;

- Develop and implement risk management infrastructures and systems.
- Ensure that control and support functions operate independently from the business generating functions.

BSA risk appetite statement constitutes both quantitative and qualitative parameters. Defined metrics were set to monitor capital, employee turnover and ethical behaviour, internal controls and risk governance, regulatory compliance and reputational impact. BSA strives to keep its risk exposure within its risk appetite thresholds.

The below table represents BLOMINVEST Saudi Arabia risk appetite metrics for the year 2014:

| Risk Metrics                          | Description  | Targets / KRIs  |
|---------------------------------------|--|---|
| Capital                               | Capital to be maintained in line with regulatory requirements  | <ul style="list-style-type: none"> <li>• Capital Ratio: Min 140%</li> <li>• Internal Capital Ratio: Min 120%</li> </ul> |
| Employee turnover                     | BSA aims to retain the best human resources and to ensure that turnover is kept at the lowest possible level   | <ul style="list-style-type: none"> <li>• Employee turnover equal to or less than 20%</li> </ul>                         |
| Internal controls and risk governance | BSA will ensure that adequate/sufficient controls are in place to detect errors/discrepancies in day-to-day operations, and that policies and procedures are developed. This in return will ensure that risk governance is well maintained within BSA. | <ul style="list-style-type: none"> <li>• Low tolerance</li> </ul>   |
| Employee ethical behaviour            | BSA aims to maintain the highest ethical and professional standard for its employees.  | <ul style="list-style-type: none"> <li>• Zero tolerance</li> </ul>  |
| Regulatory compliance                 | No regulatory compliance breaches  | <ul style="list-style-type: none"> <li>• Zero tolerance</li> </ul>  |
| Reputational impact                   | BSA will strive to maintain/enhance its reputation in the marketplace  | <ul style="list-style-type: none"> <li>• Low tolerance</li> </ul>   |

## 4.2 Credit Risks

Credit risk is the risk that counterparties and clients fail to fulfill their obligations towards BSA. It arises from all transactions that give rise to actual, contingent or potential claims against any counterparty, obligor or borrower (which we refer to collectively as "counterparties").

BSA will mainly be exposed to credit risk when providing leverage (margin trading) for clients and/or investing with counterparties in form of placements or fixed income investments. These investments will expose BSA to the following credit risks:

- Default risk is the risk that counterparties fail to meet contractual payment obligations.

- Country risk is the risk that counterparties are unable to fulfil their payment obligations as a result of government measures or country-specific economic factors.
- Settlement risk is the risk that the settlement or clearance of transactions will fail. It arises whenever the exchange of cash, securities and/or other assets is not simultaneous.

Credit risk management at BSA follows these principles:

- The approval of credit limits for counterparties and the management of individual credit exposures must fit within BSA portfolio guidelines and credit strategies, and each decision must also be justified on a risk-versus-return basis.
- The Excom has the authority to approve credit limits at BSA. The risk management function is responsible for monitoring the adherence to the credit limits and informing senior management of any material changes to credit exposures.

In order to mitigate credit risks, the use of investments in unregulated markets and OTC shall be limited and limits of such transactions shall be approved by the BOD.

Prior to setting counterparty limits, the risk management function shall conduct a pre-trade risk assessment and due diligence on proposed counterparties.

The risk management function shall continuously monitor the counterparty risk ratings and changes in market condition in order to detect potential changes in counterparty credit worthiness. This early detection of adverse changes in counterparties is used to mitigate credit risk exposures. Material changes to counterparty credit exposures shall be presented to the Excom in order to approve or take corrective action.

The credit risk is defined as the risk of loss resulting from fluctuations in the credit standing of issuers of securities, counterparties and any debtors to which authorized persons are exposed.

BLOMINVEST Saudi Arabia calculates the capital requirement for credit risk as stipulated by the regulatory body Capital Market Authority "CMA".

BSA calculated capital required against the following credit exposures:

- Authorized persons and banks - deposits/receivable;
- Authorized persons and banks – bonds;
- Private equity investments/unlisted shares;
- Real estate investments;
- Holdings of listed shares;



- High risk investment funds;
- Investment funds;
- Tangible assets;
- Other assets;
- Prohibited exposure; and
- Deferred expenditure / accrued income.

#### **4.2.1 External Ratings:**

BLOMINVEST Saudi Arabia uses ratings from Credit ratings agencies (CRA) mentioned in the Prudential Rules.

#### **4.2.2 Credit Quality Steps:**

Credit risk forms the prominent part of the Firm's risk exposures. It arises due to the exposures in listed equity kept under available for sale investments, and investments in mutual funds. The deposits placed with banks also have some credit risk, though minimal.

#### **4.2.3 Credit risk Exposure:**

BSA has complied with CMA regulations and used the Standardized Approach in the calculation of the capital required for Credit risk. The 31-Dec-2014 numbers represents the risk positions of BSA during the period.

The major types of credit exposures are detailed in Appendix 3

#### **4.2.4 Impairment, past due and provisions:**

An impaired exposure is an outstanding sum of money owed to BSA that has not been paid, despite repeated efforts to collect. On 31<sup>st</sup> December 2014 BSA had no unsettled transactions in the trading book.

#### **4.2.5 Risk Concentrations:**

BLOMINVEST Saudi Arabia internally calculates a capital charge for concentration risk based on:

- Geographic concentration, and
- Real estate investments concentration.

|   |               |
|---|---------------|
| <b>Regional Concentration</b>           |               |
| Local                                   | 94.08%        |
| GCC                                     | 0.00%         |
| Non-GCC                                 | 5.92%         |
|   | <b>100%</b>   |
| <b>Limit on Regional Concentration</b>  |               |
| Local                                   | 100%          |
| GCC                                     | 20%           |
| Non-GCC                                 | 5%            |
| <b>Excess on Regional Concentration</b> |               |
| Local                                   | 0.00%         |
| GCC                                     | 0.00%         |
| Non-GCC                                 | 0.92%         |
| <b>Excess on Regional Concentration</b> |               |
| Local                                   | -             |
| GCC                                     | -             |
| Non-GCC                                 | 3,419         |
| <b>Total</b>                            | <b>3,419</b>  |
| <b>RWA for excess funding</b>           | 400%          |
| <b>Additional RWAs</b>                  | <b>13,678</b> |

|  |         |
|--|---------|
| <b>Real Estate Concentration</b>       |         |
| % of Total Assets                      | 17.62%  |
| Limit on Real Estate concentration     | 20.00%  |
| Excess over Limit                      | 0.00%   |
| Excess Amount                          | 0.00%   |
| <b>RWA for Excess Real Estate Exp.</b> | 414.00% |
| <b>Additional RWAs</b>                 | 0.00%   |

#### 4.2.6 Credit Risk Exposures by credit Quality:

Please refer to Appendix 4 for the details.

### 4.3 Credit Risk Mitigation

Collaterals are securities, cash or assets that are offered to secure a financing or a credit sales transaction. Collateral becomes subject to seizure on default. It is a form of security to the financier/seller in case the purchaser fails to pay back the finance amount. BSA does not deal in margin lending and as such has no eligible or non-eligible financial collaterals user for credit risk mitigation purposes.

BSA has controls in place to ensure that reporting and meaningful risk-reducing action take place when limits are exceeded. Some of the common ways of reducing exposures consist of: assigning transactions to other counterparties for diversification, and restructuring transactions to limit potential exposure and manage their sensitivity to market volatility.

Credit risk mitigations are managed by each of the relevant business as follows:

#### Open ended funds

A detailed study is undertaken to verify new product feasibility and risks are assessed through a due diligence exercise. New product ideas are presented to the CEO, product commitment committee and further to the risk and compliance before being introduced to the market.

The risk limits of all equity based funds are monitored against approved benchmarks on a regular basis.

#### Holdings in Listed Stock

BSA's proprietary investments in stock involve meticulous fundamental analysis of stock prices and are spread across fundamentally sound, highly liquid stocks as outlined in the proprietary charter.

#### Exposures to Authorized Persons and Banks

BSA places deposits with highly rated banks limiting the Firm's credit risk in deposits and current account balances considerably.

In order to mitigate credit risk, BSA employs the following broad principles:

- The limits for exposures in each of the asset class is pre-established
- Every exposure to any counterparty requires approvals at the appropriate (pre-established) seniority level
- Credit ratings of the Banks where BSA places its deposits are constantly monitored.

### 4.4 Market Risk

Market risk is the risk of losses in on-and off-balance sheet trading book positions arising from movements in market rates or prices such as profits rates, foreign exchange rates, equity prices, credit spreads and/or commodity prices resulting in a loss to earnings and capital.

#### 4.4.1 Market Risk Management

BLOMINVEST Saudi Arabia calculates the capital requirement for market risk as stipulated by the regulatory body “CMA”.

BSA has a net position in USD resulting from USD denominated subordinated loan that is mostly invested in non-USD denominated investments that BSA has from its Parent Bank BLOM Bank Lebanon. This net position is expected to change in line with the settlement of the subordinated loan.

#### 4.4.1 Market Risk – Capital

Market Risk Capital requirement is as indicated below:

| Risk                                    | Capital Required |
|---|------------------|
| Excess exposure risks                   | -                |
| Settlement risks and counterparty risks | -                |
| Foreign exchange rate risks             | 1,140            |
| Commodities risks.                      | -                |
| <b>Total Market Risk Exposures</b>      | <b>1,140</b>     |

#### 4.6 Operational Risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events, this will include legal risks covering, but not limited to, exposure to fines, penalties, or punitive damages resulting from supervisory actions, as well as private settlements.

#### 4.6.1 Operational Risk Management

BLOMINVEST Saudi Arabia calculates the capital requirement for operational risk as stipulated by the regulatory body “CMA”.

Operational risk charge is based on the highest capital charge of the two following approaches:

- Overhead expenses,
- Basic Indicator Approach as per Basel II.

#### 4.6.2 Operational Risk Mitigation

The Firm maintains a risk register which follows a structured method to identify and mitigate risk. The high level steps involved in the creation of the risk register are identification, quantification and mapping of risks.

BSA has taken a Professional Indemnity Insurance policy (PII) from a reputed insurance company, which insures the Firm for a reasonable sum.

The Firm has in place a documented Business Continuity Planning (BCP), which comes under the oversight of the Risk Management Department and serves to ensure that the Firm has in place resources to manage unexpected crises and ensure continued effective operations.

#### 4.6.3 Operational Risk Capital Charge

| SAR' 000                                 |      |      |              |                         |                         |                     |
|--|------|------|--------------|-------------------------|-------------------------|---------------------|
| Approach 1                               |      | YEAR | Gross Income | Average Income          | Risk Capital Charge (%) | Capital Requirement |
| Basic Indicator Approach (BIA)           | 2011 |      | 8,812        | 25,417                  | 15%                     | 3,813               |
|  | 2012 |      | 17,692       |                         |                         |                     |
|  | 2013 |      | 49,748       |                         |                         |                     |
| Approach2                                |      | YEAR | Expenses     | Risk Capital Charge (%) |                         | Capital Requirement |
| Expenditure Based Approach               |      | 2013 | 19,482       | 25%                     |                         | 4,871               |
| Capital requirement For Operational Risk |      |      |              |                         |                         | 4,871               |

## 4.7 Liquidity Risk:

Liquidity risk is the volatility in the economic value of, or in the income derived from, BSA's positions due to inability to meet obligations out of readily available liquid resources or to execute a transaction in the market at the prevailing prices. Such an inability may force BSA to borrow at unattractive conditions or to liquidate assets at unattractive prices when it would be better to avoid such liquidations. It is the risk to the earnings and capital arising from potential inability to meet obligations when they are due without incurring unacceptable losses.

The main objective of liquidity risk management is to ensure that BSA can always meet its payment obligations punctually and in full.

### 4.7.1 Liquidity Risk Management:

The risk management function shall ensure that limits compliance is continuous monitored and that BSA maintains sufficient liquidity in order to meet on and off balance sheet obligations.

Liquidity risk management is a key function and integral part of the asset and liabilities management process. Liquidity refers to the condition where the financial institution has ability to fund on an on-going basis, any decreases in its liabilities or increases in its assets by either obtaining new liabilities or selling or leveraging on existing assets.

Additional capital allocation for liquidity risks do not serve as a cushion in times of liquidity crises.

BSA pursues a policy of high levels of liquidity through active and prudent management of assets and liabilities.

BSA monitors the following for a better management of liquidity risk:

- Cash inflows and outflows (cash management)
- Expected liabilities from BSA contracts and agreements
- Maturity date for any of BSA's loans, in case they existed
- Placement of excess cash in Murabaha or money market fund with a view of gaining income and preserving capital. In case BSA's Executive Committee decided to enter into an unexpected deal, the units' redemption of Murabaha or money market fund takes four business days indicating the liquidity and security of such investments.

#### 4.7.2 Stress Testing and Capital Planning

Stress testing is an integral part of BSA’s risk management systems and is used to evaluate the potential vulnerability to some unlikely but plausible events or movements in financial variables.

BSA will stress relevant parameters at three levels of increasing adversity –mild, medium, and severe – with reference to the normal situation and estimate the financial resources needed by it under each of the circumstances to:

- Meet the risk as it arises and for mitigating the impact of manifestation of that risk;
- Meet the liabilities as they fall due; and
- Meet the regulatory and risk appetite limits.

BSA has built-in two types of stress testing in its ICAAP model, namely Individual and Overall.

Under individual stress testing, BSA assesses the effect of a particular stress event in isolation (without taking other stress events into consideration).

Under overall stress testing, BSA assumes an economic downturn situation which impacts several factors at the same time.

Under both, individual and overall, three levels of severity are assumed (mild, medium and severe).

BSA has assumed that all the relevant stress events take place as of 31 December 2014.

Any breaches resulting from the stress test are rectified through appropriate and feasible remedial management actions.

#### 4.7.3. Risk Measures and Ratios:

A monthly analysis of the residual maturity profile of BSA’s assets and liabilities has been conducted segregating them in different maturity buckets.

| S.NO | Particulars   | Values | Inference  |
|------|---|--------|--|
| 1    | Current Ratio ( Current Assets/Current liab)                  | 11.95  | This reflects the cushion/comfort level of current assets in meeting Firm’s short-term payment liabilities   |
| 2    | Cumulative Gap as a % of total liabilities (excluding equity) | 1559%  | This reflects that the Company has no significant short term liabilities and earning assets are funded by equity.  |
| 3    | Liquidity Coverage Ratio                                      | 4055%  | Liquidity coverage ratio is calculated by dividing high quality liquid assets by short term obligations. A liquidity coverage ratio of greater than 100% is considered satisfactory. LCR reflects that the Company has sufficient high quality liquid assets to cover the net cash outflows over next 90 days. |

## Appendix 1: Illustrative Disclosure on Capital Base

| Capital Base                               | SAR '000       |
|--|----------------|
| <b><u>Tier-1 capital</u></b>               |                |
| Paid-up capital                            | 245,000        |
| Audited retained earnings                  | 14,603         |
| Share premium                              | -              |
| Reserves (other than revaluation reserves) | 14,603         |
| Tier-1 capital contribution                | -              |
| Deductions from Tier-1 capital             | (153)          |
| <b>Total Tier-1 capital</b>                | <b>261,603</b> |
| <b><u>Tier-2 capital</u></b>               |                |
| Subordinated loans                         | 51,500         |
| Cumulative preference shares               | -              |
| Revaluation reserves                       | 4,618          |
| Other deductions from Tier-2 (-)           | -              |
| Deduction to meet Tier-2 capital limit (-) | -              |
| <b>Total Tier-2 capital</b>                | <b>56,118</b>  |
|  |                |
| <b>TOTAL CAPITAL BASE</b>                  | <b>317,721</b> |



## Appendix 2: Illustrative Disclosure on Capital Adequacy

| Exposure Class                                  | Exposures before CRM SAR '000 |                | Net Exposures after CRM SAR '000 | Risk Weighted Assets SR '000 | Capital Requirement SAR '000 |
|---|-------------------------------|----------------|----------------------------------|------------------------------|------------------------------|
|   |                               |                |                                  |                              |                              |
| <b><i>Credit Risk</i></b>                       |                               |                |                                  |                              |                              |
| <i>On-balance Sheet Exposures</i>               |                               |                |                                  |                              |                              |
| Governments and Central Banks                   | -                             | -              | -                                | -                            | -                            |
| Authorised Persons and Banks                    | 130,068                       | 130,068        | 130,068                          | 33,666                       | 4,713                        |
| Corporates                                      | -                             | -              | -                                | -                            | -                            |
| Retail  | -                             | -              | -                                | -                            | -                            |
| Investments                                     | 219,629                       | 219,629        | 219,629                          | 440,302                      | 61,642                       |
| Securitisation                                  | -                             | -              | -                                | -                            | -                            |
| Margin Financing                                | -                             | -              | -                                | -                            | -                            |
| Other Assets                                    | 32,218                        | 32,218         | 32,218                           | 94,195                       | 13,187                       |
| <b>Total On-Balance sheet Exposures</b>         | <b>381,915</b>                | <b>381,915</b> | <b>381,915</b>                   | <b>568,163</b>               | <b>79,542</b>                |
| <i>Off-balance Sheet Exposures</i>              |                               |                |                                  |                              |                              |
| OTC/Credit Derivatives                          | -                             | -              | -                                | -                            | -                            |
| Repurchase agreements                           | -                             | -              | -                                | -                            | -                            |
| Securities borrowing/lending                    | -                             | -              | -                                | -                            | -                            |
| Commitments                                     | -                             | -              | -                                | -                            | -                            |
| Other off-balance sheet exposures               | -                             | -              | -                                | -                            | -                            |
| <b>Total Off-Balance sheet Exposures</b>        | <b>-</b>                      | <b>-</b>       | <b>-</b>                         | <b>-</b>                     | <b>-</b>                     |
| <b>Total On and Off-Balance sheet Exposures</b> | <b>381,915</b>                | <b>381,915</b> | <b>381,915</b>                   | <b>568,163</b>               | <b>79,542</b>                |
| <b>Prohibited Exposure Risk Requirement</b>     | <b>9,151</b>                  |                | <b>9,151</b>                     | <b>51,612</b>                | <b>7,226</b>                 |
| <b>Total Credit Risk Exposures</b>              | <b>391,066</b>                |                | <b>391,066</b>                   | <b>619,775</b>               | <b>86,768</b>                |
| <b><i>Market Risk</i></b>                       | Long Position                 | Short Position |                                  |                              |                              |
| Interest rate risks                             | -                             | -              |                                  |                              | -                            |
| Equity price risks                              | -                             | -              |                                  |                              | -                            |
| Risks related to investment funds               | -                             | -              |                                  |                              | -                            |
| Securitisation/resecuritisation positions       | -                             | -              |                                  |                              | -                            |
| Excess exposure risks                           | -                             | -              |                                  |                              | -                            |
| Settlement risks and counterparty risks         | -                             | -              |                                  |                              | -                            |
| Foreign exchange rate risks                     | -                             | 56,779         |                                  |                              | 1,140                        |
| Commodities risks.                              | -                             | -              |                                  |                              | -                            |
| <b>Total Market Risk Exposures</b>              | <b>-</b>                      | <b>56,779</b>  |                                  |                              | <b>1,140</b>                 |
| <b><i>Operational Risk</i></b>                  |                               |                |                                  |                              | <b>4,871</b>                 |
| <b>Minimum Capital Requirements</b>             |                               |                |                                  |                              | <b>92,779</b>                |
| <b>Surplus/(Deficit) in capital</b>             |                               |                |                                  |                              | <b>224,942</b>               |
| <b>Total Capital ratio (time)</b>               |                               |                |                                  |                              | <b>3.42</b>                  |

### Appendix 3: Illustrative Disclosure on Credit Risk's Risk Weight

| Risk Weights                          | Exposures after netting and credit risk mitigation |                               |                              |                  |            |        |             |              |                               |         | Total Exposure after netting and Credit Risk Mitigation | Total Risk Weighted Assets |
|---------------------------------------|--|-------------------------------|------------------------------|------------------|------------|--------|-------------|--------------|-------------------------------|---------|---|----------------------------|
|                                       | Governments and central banks                      | Administrative bodies and NPO | Authorised persons and banks | Margin Financing | Corporates | Retail | Investments | Other assets | Off-balance sheet commitments |         |   |                            |
| 0%                                    | -  | -                             | -                            | -                | -          | -      | -           | 1            | -                             | 1       | -   |                            |
| 20%                                   | -  | -                             | 104,559                      | -                | -          | -      | -           | -            | -                             | 104,559 | 20,912  |                            |
| 50%                                   | -  | -                             | 25,509                       | -                | -          | -      | -           | -            | -                             | 25,509  | 12,755  |                            |
| 100%                                  | -  | -                             | -                            | -                | -          | -      | -           | -            | -                             | -       | -   |                            |
| 150%                                  | -  | -                             | -                            | -                | -          | -      | 144,785     | 21,917       | -                             | 166,702 | 250,053   |                            |
| 200%                                  | -  | -                             | -                            | -                | -          | -      | -           | -            | -                             | -       | -   |                            |
| 300%                                  | -  | -                             | -                            | -                | -          | -      | 39,648      | 2,954        | -                             | 42,602  | 127,806   |                            |
| 400%                                  | -  | -                             | -                            | -                | -          | -      | 26,045      | -            | -                             | 26,045  | 104,180   |                            |
| 500%                                  | -  | -                             | -                            | -                | -          | -      | -           | -            | -                             | -       | -   |                            |
| 714%<br>(include prohibited exposure) | -  | -                             | -                            | -                | -          | -      | 9,151       | 7,347        | -                             | 16,498  | 104,069   |                            |
| Average Risk Weight                   | -  | -                             | 26%                          | -                | -          | -      | 224%        | 292%         | -                             | -       | -   |                            |
| Deduction from Capital Base           | -  | -                             | 4,713                        | -                | -          | -      | 68,868      | 13,187       | -                             | 86,768  | -   |                            |

**Appendix 4: Illustrative Disclosure on Credit Risk's Rated Exposure**

| Exposure Class                            | Long term Ratings of counterparties |               |          |              |            |             |                |                |
|---|-------------------------------------|---------------|----------|--------------|------------|-------------|----------------|----------------|
|   | Credit quality step                 | 1             | 2        | 3            | 4          | 5           | 6              | Unrated        |
|   | S&P                                 | AAA TO AA-    | A+ TO A- | BBB+ TO BBB- | BB+ TO BB- | B+ TO B-    | CCC+ and below | Unrated        |
|   | Fitch                               | AAA TO AA-    | A+ TO A- | BBB+ TO BBB- | BB+ TO BB- | B+ TO B-    | CCC+ and below | Unrated        |
|   | Moody's                             | Aaa TO Aa3    | A1 TO A3 | Baa1 TO Baa3 | Ba1 TO Ba3 | B1 TO B3    | Caa1 and below | Unrated        |
| Capital Intelligence                      | AAA                                 | AA TO A       | BBB      | BB           | B          | C and below | Unrated        |                |
| <b>On and Off-balance-sheet Exposures</b> | -                                   | -             | -        | -            | -          | -           | -              | -              |
| Governments and Central Banks             | -                                   | -             | -        | -            | -          | -           | -              | -              |
| Authorised Persons and Banks              | -                                   | 25,509        | -        | -            | -          | -           | -              | -              |
| Corporates                                | -                                   | -             | -        | -            | -          | -           | -              | -              |
| Retail                                    | -                                   | -             | -        | -            | -          | -           | -              | -              |
| Investments                               | -                                   | -             | -        | -            | -          | -           | -              | 219,629        |
| Securitisation                            | -                                   | -             | -        | -            | -          | -           | -              | -              |
| Margin Financing                          | -                                   | -             | -        | -            | -          | -           | -              | -              |
| Other Assets                              | -                                   | -             | -        | -            | -          | -           | -              | -              |
| <b>Total</b>                              | -                                   | <b>25,509</b> | -        | -            | -          | -           | -              | <b>219,629</b> |

| Exposure Class                            | Short term Ratings of counterparties |                |     |     |           |               |
|---|--------------------------------------|----------------|-----|-----|-----------|---------------|
|   | Credit quality step                  | 1              | 2   | 3   | 4         | Unrated       |
|   | S & P                                | A-1+, A-1      | A-2 | A-3 | Below A-3 | Unrated       |
|   | Fitch                                | F1+, F1        | F2  | F3  | Below F3  | Unrated       |
|   | Moody's                              | P-1            | P-2 | P-3 | Not Prime | Unrated       |
|   | Capital Intelligence                 | A1             | A2  | A3  | Below A3  | Unrated       |
| <b>On and Off-balance-sheet Exposures</b> | -                                    | -              | -   | -   | -         | -             |
| Governments and Central Banks             | -                                    | -              | -   | -   | -         | -             |
| Authorised Persons and Banks              | -                                    | 104,559        | -   | -   | -         | -             |
| Corporates                                | -                                    | -              | -   | -   | -         | -             |
| Retail                                    | -                                    | -              | -   | -   | -         | -             |
| Investments                               | -                                    | -              | -   | -   | -         | -             |
| Securitisation                            | -                                    | -              | -   | -   | -         | -             |
| Margin Financing                          | -                                    | -              | -   | -   | -         | -             |
| Other Assets                              | -                                    | -              | -   | -   | -         | 32,218        |
| <b>Total</b>                              | -                                    | <b>104,559</b> | -   | -   | -         | <b>32,218</b> |

**Appendix 5: Illustrative Disclosure on Credit Risk Mitigation (CRM)**

| Exposure Class                                  | Exposures before CRM | Exposures covered by Guarantees/ Credit derivatives | Exposures covered by Financial Collateral | Exposures covered by Netting Agreement | Exposures covered by other eligible collaterals | Exposures after CRM |
|---|----------------------|---|---|--|---|---------------------|
| <b><i>Credit Risk</i></b>                       | -                    | -   | -   | -                                      | -   | -                   |
| <i>On-balance Sheet Exposures</i>               | -                    | -   | -   | -                                      | -   | -                   |
| Governments and Central Banks                   | -                    | -   | -   | -                                      | -   | -                   |
| Authorised Persons and Banks                    | 130,068              | -   | -   | -                                      | -   | 130,068             |
| Corporates                                      | -                    | -   | -   | -                                      | -   | -                   |
| Retail  | -                    | -   | -   | -                                      | -   | -                   |
| Investments                                     | 219,629              | -   | -   | -                                      | -   | 219,629             |
| Securitisation                                  | -                    | -   | -   | -                                      | -   | -                   |
| Margin Financing                                | -                    | -   | -   | -                                      | -   | -                   |
| Other Assets                                    | 32,218               | -   | -   | -                                      | -   | 32,218              |
| <b>Total On-Balance sheet Exposures</b>         | <b>381,915</b>       |   |   |  |   | <b>381,915</b>      |
| <i>Off-balance Sheet Exposures</i>              | -                    | -   | -   | -                                      | -   | -                   |
| OTC/Credit Derivatives                          | -                    | -   | -   | -                                      | -   | -                   |
| Exposure in the form of repurchase agreements   | -                    | -   | -   | -                                      | -   | -                   |
| Exposure in the form of securities lending      | -                    | -   | -   | -                                      | -   | -                   |
| Exposure in the form of commitments             | -                    | -   | -   | -                                      | -   | -                   |
| *Other Off-Balance sheet Exposures              | -                    | -   | -   | -                                      | -   | -                   |
| <b>Total Off-Balance sheet Exposures</b>        | <b>-</b>             | <b>-</b>  | <b>-</b>                                  | <b>-</b>                               | <b>-</b>  | <b>-</b>            |
| <b>Total On and Off-Balance sheet Exposures</b> | <b>381,915</b>       | <b>-</b>  | <b>-</b>                                  | <b>-</b>                               | <b>-</b>  | <b>381,915</b>      |