QNB (Switzerland) Ltd.

Basel III
Pillar 3 Disclosures

As per FINMA circular 2016/1 “Disclosure - Banks”

31 December 2019

Contents

1. Introduction

QNB (Switzerland) Ltd. (the Bank) is regulated by the Swiss Financial Market Supervisory Authority (FINMA), which requires banks to comply with the Basel III Pillar 3 disclosures framework. This report was prepared based on the FINMA circular 2016/1 "Disclosure – Banks" as at 31 December 2019.

The objective of this report is to provide information with regard to risk management to the Bank's stakeholders and the public.

2. Capital adequacy and liquidity

The Bank's objectives when managing capital and liquidity are to comply with the requirements set by regulators and to safeguard its ability to continue as a going concern. The Bank reports regulatory capital according to the Swiss Capital Ordinance, thereby complying with the FINMA requirements.

As at 31 December 2019, the total capital ratio was 31.7%, well above FINMA's target of 10.5% for category 5 banks and the specific requirement of 12.5% applicable to the Bank.

The leverage ratio was 13.4%. This ratio is also significantly above the regulatory requirement of 3%.

The Bank's liquidity coverage ratio (LCR) was 617.6% at 31 December 2019, above the minimum regulatory requirement of 100%.

3. KM1: Key Metrics

Key metrics (KM1)
In 000' CHF

		31.12.2019	31.12.2018
	Available capital		
1	Common Equity Tier 1 (CET1)	146,497	143,167
2	Tier 1	146,497	143,167
3	Total capital	171,497	168,167
	Risk-weighted assets		
4	Total Risk-weighted assets	540,577	534,320
	Risk-based capital ratios as percentage of RWA		
5	CET1 ratio (%)	27.1%	26.9%
6	Tier 1 ratio (%)	27.1%	26.9%
7	Total capital ratio (%)	31.7%	31.6%
	Additional CET1 buffer requirements as per percentage of RWA		
8	Capital conservation buffer requirement (2.5% from 2019) (%)	2.5%	0.0%
9	Countercyclical buffer requirement (%)	0.0%	0.0%
11	Total of bank CET1 specific buffer requirements (%) (row 8 + row 9)	2.5%	0.0%
12	CET1 available after meeting the bank's minimum capital requirements (%)	21.2%	21.1%
12a	Conservation buffer according to CAO annex 8 (%)	2.5%	2.5%
12b	Countercyclical buffer requirement (%) (art. 44 and 44a CAO)	0.0%	0.0%
12c	CET1 target ratio (%) as per Annex 8 of the CAO plus the countercyclical capital buffer	7.0%	7.0%
12d	T1 target ratio (%) as per Annex 8 of the CAO plus the countercyclical capital buffer	8.5%	8.5%
12e	Total capital target ratio (%) as per Annex 8 of the CAO plus the counter-cyclical capital buffer	10.5%	10.5%
	Additional Tier 1 capital requirement according to Circular 11/2 in case of a specific FINMA decree*	2.0%	2.0%
	Basel III leverage ratio		
13	Total Basel III leverage ratio exposure measure	13.4%	13.3%
14	Basel III leverage ratio (%) (including the impact of any applicable temporary exemption of central bank reserve)	13.4%	13.3%
	Liquidity coverage ratio		
15	Total high-quality liquid assets (HQLA)	64,992	24,312
16	Total net cash outflow	10,524	17,957
17	LCR ratio (%)	617.6%	135.4%

**This is an additional requirement from FINMA based on the Bank's business model and risk profile.*

4. OV1: Risk weighted assets

The below table summarizes the composition of the risk weighted assets, and the minimum requirement based on capital requirement for FINMA category 5 banks.

In 000' CHF

		RWA	RWA	Minimum capital requirement
		31.12.2019	31.12.2018	31.12.2019
1	Credit risk (Excluding counterparty credit risk - CCR)	503,152	496,524	40,252
	Of which credit risk - counterparty risk	501,358	493,675	40,109
	Of which credit risk - Non-counterparty risk	1,794	2,849	144
20	Market risk	1,988	591	159
24	Operational risk	35,437	37,204	2,835
25	**Total (1 + 20 + 24)**	**540,577**	**534,320**	**43,246**

5. LIQA: liquidity risk management

Liquidity risk is defined as the Bank's ability to meet its obligations as they come due at any time.
As a firm, QNB (Switzerland) Ltd. considers a sound management of its liquidity as essential for the success of the business.
The Bank manages liquidity risk by making sure that ample liquid assets are available to meet commitments to customers at all times. The overall liquidity management strategy is set by the Board of Directors, which sets the Bank's overall risk appetite. The day-to-day management and oversight is delegated to the Bank's Assets and Liabilities Committee (ALCO).
From an ALM point of view, most of the Bank's assets are match funded by long-term funds with maturities exceeding one year.

The liquidity management process includes:

- Day-to-day monitoring of cash flows to ensure that regulatory and internal limits are not breached;
- the active management of available liquidity (client's current accounts and the Bank's nostro accounts);
- maintaining a portfolio of highly marketable securities that can be quickly converted into cash (HQLA portfolio);
- monitoring balance sheet liquidity ratios to ensure compliance with internal and regulatory requirements.

6. CR1: Credit risk - credit quality of assets

In 000' CHF

	a	b	c	d
	Gross carrying values of		Value adjustments/impairments	Net values (a + b - c)
	Defaulted exposures	Non-defaulted exposures		
1 Loans (excluding debt securities)*	262	1,073,104	262	1,073,104
2 Debt securities**		7,835		7,835
3 Off-balance-sheet exposures		22,845		22,845
4 **TOTAL**	**262**	**1,103,784**	**262**	**1,103,784**

**The Loans balance includes: balances held at central banks, amounts due from banks, amounts due from customers, mortgage loans, and accrued interest on all of the aforementioned.*

***The debt securities balance includes accrued interest.*

7. CR2: Default risk - Changes in stock of defaulted loans and debt securities

In 000' CHF

		2019
1	Defaulted loans and debt securities at end of the previous reporting period	132
2	Loans and debt securities that have defaulted since the last reporting period	130
3	Returned to non-defaulted status	
4	Amounts written off	
5	Other changes (+/-)	
6	**Defaulted loans and debt securities at end of the reporting period (1+2-3-4±5)**	**262**

8. CR3: Credit risk mitigation techniques – overview

In 000' CHF

		Exposures unsecured: carrying amount	Exposures secured by collateral	Exposures secured by collateral, of which: secured amount	Exposures secured by financial guarantees
1	Loans (excluding debt securities)*	327,270	746,096	746,096	658,433
2	Debt securities**	7,835	-	-	-
3	**TOTAL**	**335,105**	**746,096**	**746,096**	**658,433**
4	of which defaulted	260	2		

**The Loans balance includes: balances held at central banks, amounts due from banks, amounts due from customers, mortgage loans, and accrued interest on all of the aforementioned.*

***The debt securities balance includes accrued interest.*

9. CR5: Standardized approach – exposures by asset classes and risk weight

In 000' CHF

	Exposure class/risk weight	0%	10%	20%	35%	50%	75%	100%	150%	Other	Total credit exposures amount (post-CCF and post-CRM)
1	Central governments and central banks	61,169									61,169
2	Banks and securities firms			193,980		709,721					903,702
3	Non-central government public sector entities and multilateral development banks			3,016							3,016
4	Corporates							35,000			35,000
5	Retail				31,870		5,641	52,732			90,243
6	Equity										
7	Other exposures							3,980			3,980
8	**TOTAL**	**61,169**		**196,996**	**31,870**	**709,721**	**5,641**	**91,712**			**1,097,110**
9	Of which, covered by mortgages				30,727						30,727

10. CRB: Credit risk - additional disclosure related to the credit quality of assets

a. Past due exposures

A loan exposure is considered as past due if no payments of either interest or principal have been made for 90 days.
All unauthorized overdrafts, either related to interest, principal instalments, fees and commissions, that are overdue for more than 90 days are also considered as past due.

The Bank's Risk and Credit department have procedures in place to monitor those exposures on a daily basis. As at 31.12.2019, the balance of past due exposures was CHF 261'999, mostly comprised of overdrafts.

b. Impaired exposure

Impairment losses are recorded when there are objective indications that a loan carrying value is higher than its recoverable value, i.e., the debtor is unlikely to fulfil its payments obligations.

Indications of an impaired loan / receivable include:

- Considerable financial difficulties on the part of the debtor;
- actual breach of contract (e.g. default on or delay in interest or principal payments);
- high probability of default or the implementation of a restructuring process by the debtor;
- a significant decline in market value if the asset is listed on a stock exchange or actively traded.

c. Restructured facilities

According to the Bank's policy, a restructured credit facility is any facility that has its terms changed before maturity of the credit facility due to financial issues or credit deterioration experienced by the borrower (Bank's client). As at 31.12.2019, there were no restructured exposures.

11. ORA: Operational risk – Overview

Operational risk is the occurrence of a direct or an indirect loss arising from a wide variety of events linked to a failure of Bank's processes, personnel, technology and infrastructure, and from external factors other than credit, liquidity or market risks. Operational risk is inherent to the Bank's activities and therefore needs to be managed properly to avoid significant financial and reputational damage.

The Bank also uses an extensive set of methodologies, tools and systems, which enable a proactive management of the operational risk with an appropriate control environment. In addition, the mitigation of operational risk is achieved with an established framework of policies and procedures, which are regularly reviewed and updated.

Periodic reviews undertaken by internal and external auditors ensure compliance with regulation and internal procedures and policies. The results of these reviews are discussed with the Executive Management and a summary is provided to the Board of Directors.

Regarding the calculation of the capital requirement to cover operational risk, the Bank applies the Basic Indicator Approach. The amount of capital to be held to cover the risk is calculated by applying 15% to the average annual positive gross income over the last three years. Figures for any year in which annual gross income is negative or zero are excluded from both the numerator and denominator when calculating the average. Gross income is defined as net interest income and net non-interest income from the Bank's operating activities.

12. IRRBB: Risk management objective and policies:

IRRBB refers to the risk to the Bank's capital and earnings arising from movements in interest rates (reference rates) that affect the banking book positions. When interest rates change, the present value and timing of future cash flows are also modified. Therefore, it also impacts the Economic Value of the Bank. Changes in interest rates also affect earnings by altering interest rate-sensitive income and expenses, which affect net interest income (NII). Consequently, an excessive IRRBB exposure can be a significant threat to the Bank's current capital base and/or future earnings if not managed appropriately.
Reference rates are defined as rate indices, and any combination thereof (including spreads between two reference rates), whose values result from financial market activities (e.g. LIBOR, OIS) and rate indices that are used in liquid financial instruments.

a. Description of the Bank's superior strategies to manage and mitigate IRRBB:

The Risk management department monitors compliance with approved limits. The local Asset Liability Management Committee (ALCO) monitors and reviews the management of the Bank's balance sheet. It proposes revisions to limits when it is deemed necessary in order to ensure that the overall risk appetite and risk limits are in line.

b. Periodicity in the calculation of the Bank's IRRBB:

The Bank monitors IRRBB exposure on a monthly basis vs approved limits. In addition, on a quarterly basis, the Bank applies a stress test using a set of scenarios (the six standardized interest rate shock scenarios recommended by FINMA). All of the results are sent to the Swiss National Bank on a quarterly basis using a standard report.

c. Measurement approach of the interest rate risk:

The interest rate risk is measured taking into account the interest rates movements' impact on the Bank's Economic Value (EV) according to the following criteria:

- EV sensitivity of the equity;
- sensitivity of the NII (Net Interest Income);
- for the Bank's equity, the sensitivity of the EV is assessed based on the Market Value Delta approach (FINMA parallel up) with a shift of 100BPS along the yield curve in CHF.

d. Description of the stress scenario the Bank applies to assess the interest rate shocks on the EV and NII:

The Bank applies the following standardized stress scenarios recommended by FINMA (Circular 2019/2, annex 2). The objective is to calculate the impact on the present value of equity, broken down by major currencies. The six standardized interest rate shock scenario are:

i. parallel upward shock;
ii. parallel downward shock;
iii. Steepener shock (short-term interest rates fall and long-term interest rates rise);
iv. Flattener shock (short-term interest rates rise and long-term interest rates fall);
v. Upward shock of short-term interest rates; and
vi. Downward shock of short-term interest rates.

e. General description of how the Bank covers the IRRBB as well as the relative complete treatment:

The Bank applies the principles defined by FINMA in the circular 2019/2 - Interest rate risk - Banks. The assumptions and parameters are described in section **f**.

f. General description of the key assumptions and key parameters of the modelling used to calculate EVE and NII in IRRBB1 and taking into account the positions and currencies according to IRRBBA1:

To assess the interest rate movement impact on the Economic Value (ΔEVE), the Bank uses the contractual repricing dates of the cash flows. Each value is assigned to a standardized time bucket prescribed by FINMA in the circular 2019/2- Interest rate risks – Banks, Annex 2.
When the repricing date is unknown, for instance for NMDs (Non Maturing Deposits), the balance is allocated to the bucket "overnight".
The rate used to discount the contractual cash flows is based on the zero-coupon yield curve of the corresponding currency applying the "bootstrapping" approach.
To assess the interest rate movement impact on the NII (ΔNII), the Bank uses the average repricing maturity and renewal assumptions by type of product composing the banking book. The revenues and expenses sensitivity is set based on the current interest rates and a projection of the corresponding yield curve described in section **c**.

13. IRRBBA1: Quantitative information on IRRBB

			Volume (in 000' CHF)		Average repricing maturity (in years)	
			Total	Of which CHF	Total	Of which CHF
Determined repricing date	Receivables	Receivables from banks	50,000	50,000	0.14	0.14
		Receivables from clients	743,950	436,968	0.06	0.21
		Money-market mortgages	28,985	2,704	0.09	0.21
		Fixed-rate mortgages	1,741	1,741	2.77	2.77
		Financial investments	7,828	3,009	7.77	3.85
		Other receivables				
		Receivables from interest derivatives				
	Liabilities	Liabilities to banks	743,714	407,838	0.10	0.15
		Liabilities from client deposits				
		Medium-term notes				
		Bonds and mortgage-backed bonds				
		Other liabilities				
		Liabilities from interest derivatives				
Undetermined repricing date	Receivables	Receivables from banks	183,976	13,652	0.09	0.07
		Receivables from clients				
		Variable mortgage claims				
		Other receivables				
	Liabilities	Sight liabilities in personal and current ac	186,159	10,863	0.08	0.09
		Other liabilities				

14. IRRBB1: Quantitative information

	ΔEVE 31.12.2019 CHF	ΔNII 31.12.2019 CHF
Parallel upward shift	-1,702,862	1,691,924
Parallel downward shift	2,371,044	-1,660,234
Steepener shock	-852,799	
Flattener shock	545,101	
Upward short-term interest rate shock	-245,396	
Downward short-term interest rate shock	262,763	
Maximum	-1,702,862	-1,660,234
Period	**31.12.2019**	**31.12.2019**
Tier 1 capital (T1)	146,496,864	146,496,864