

Bank of America, N.A. (India Branches)

# Basel III Pillar 3 Disclosures

As at September 30, 2020

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

### Contents

1. Scope of application and capital adequacy
2. Risk exposure and assessment
3. Composition of Capital disclosure

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

### Table DF-1: Scope of Application

Name of the entity to which the framework applies: **Bank of America N.A. (India branches)**

The Basel III Pillar 3 disclosures contained herein relate to Bank of America, N.A. – India Branches (hereafter referred to as the “the Bank” or “BANA India”) for the period ended September 30, 2020. Bank of America Corporation (“BAC” or “the Company”) has a subsidiary, Bank of America, N.A. (“BANA U.S.”) into which BANA India is consolidated. The Pillar 3 disclosures are compliant with Reserve Bank of India (the “RBI”) Master circular DBOD. No. BP.BC. 1/21.06.201/2015-16 dated July 1, 2015 on BASEL III Capital Regulations along with Master circular DBOD. No. BP.BC. 5/21.06.001/2014-15 dated July 1, 2014 on Prudential Guidelines on Capital Adequacy and Market Discipline – New Capital Adequacy Framework.

RBI has implemented Basel III capital regulations effective April 1, 2013 with transitional arrangements as below:

#### **Transitional Arrangements - BASEL III Capital Regulations (Updated with revised timelines as specified by RBI)**

Considering the potential stress on account of COVID-19, RBI has decided to defer the implementation of the last tranche of 0.625% of the CCB from 31 March 2020 to 30 September 2020. In view of the continuing stress on account of COVID-19, RBI has decided to defer the implementation of the last tranche of 0.625 per cent of the Capital Conservation Buffer (CCB) from September 30, 2020 to April 1, 2021

Minimum capital ratios		(% of RWAs)			
		March 31, 2020	March 31, 2021	March 31, 2022	March 31, 2023
Minimum Common Equity Tier 1 (CET1)	A	5.500	5.500	5.500	5.500
Capital conservation buffer (CCB)	B	1.875	1.875	2.500	2.500
Global Systemically Important Banks buffer (GSIB)(^)	C	2.500	2.500	2.500	2.500
Minimum Tier 1 capital	D	7.000	7.000	7.000	7.000
Minimum Total Capital (*)	E	9.000	9.000	9.000	9.000
Minimum Regulatory Capital Requirement	F = E + B+ C	13.375	13.375	14.000	14.000

^ GSIB percentage as applicable currently for Bank of America (prescribed by Federal Reserve Board)

\*The difference between the minimum total capital requirement of 9% and Tier I requirement can be met with Tier 2 and higher forms of capital.

Under BASEL III norms - transitional arrangements, the bank is currently required to maintain a minimum total capital to risk weighted assets ratio (“CRAR”) of 13.375% (including CCB and G SIB requirement) and a minimum Common Equity Tier 1 CRAR of 5.5% and minimum Tier 1 CRAR of 7.0%.

#### **I. Qualitative disclosures:**

The provisions of Accounting Standard (“AS”) 21 - Consolidated Financial statements, AS 23 Accounting for Investments in Associates in Consolidated Financial statements & AS 27 - Financial Reporting of Interest in Joint

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

Ventures, issued by The Institute of Chartered Accountants of India ("ICAI") and notified by the Companies (Accounting Standards) Rules 2006 do not apply to the Bank. The Bank has not invested its capital in any of the entities operating in India and owned by BAC. Further, the Bank does not have any interest in insurance entities. Hence the qualitative disclosures are only made for BANA India as a standalone entity.

### a. List of group entities considered for consolidation

Name of the entity / Country of incorporation	Whether the entity is included under accounting scope of consolidation (yes / no)	Explain the method of consolidation	Whether the entity is included under regulatory scope of consolidation (yes / no)	Explain the method of consolidation	Explain the reasons for difference in the method of consolidation	Explain the reasons if consolidated under only one of the scopes of consolidation
Not Applicable						

### b. List of group entities not considered for consolidation both under the accounting and regulatory scope of consolidation

Name of the entity / Country of incorporation	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity) INR Million*	% of bank's holding in the total equity	Regulatory treatment of bank's investments in the capital instruments of the entity	Total balance sheet assets (as stated in the accounting balance sheet of the legal entity) INR Million
BofA Securities India Limited (formerly DSP Merrill Lynch Limited) / India *	Securities Broker/Dealer and Merchant Banker	26,472	NIL	Not Applicable	67,356

\* Amounts are as per last audited financial statements (F.Y. ending March 31, 2020)

## II. Quantitative disclosures

### c. List of group entities considered for consolidation

Name of the entity / country of incorporation (as indicated in (i)a. above)	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)	Total balance sheet assets (as stated in the accounting balance sheet of the legal entity)
Not Applicable			

### d. The aggregate amount of capital deficiencies in all subsidiaries which are not included in the regulatory scope of consolidation i.e. that are deducted:

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

Name of the subsidiaries / country of incorporation	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)	% of bank's holding in the total equity	Capital deficiencies
Not Applicable				

**e. The aggregate amounts (e.g. current book value) of the bank's total interests in insurance entities, which are risk-weighted:**

Name of the insurance entities / country of incorporation	Principle activity of the entity	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)	% of bank's holding in the total equity / proportion of voting power	Quantitative impact on regulatory capital of using risk weighting method versus using the full deduction method
Not Applicable				

**f. Any restrictions or impediments on transfer of funds or regulatory capital within the banking**

**group:** Disclosures for BANA India are given as a standalone entity and therefore this disclosure requirement is not applicable.

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

### Table DF-2: Capital Adequacy

#### I. Qualitative disclosures

The Bank is required to comply with all applicable laws and regulations in India including guidelines issued by RBI and other relevant regulatory bodies.

The Internal Capital Adequacy Assessment Process ("ICAAP") document assesses the capital adequacy for the Bank and details the process by which this assessment is made based on a reference date and looking forward, over a three-year planning horizon ("ICAAP Planning Horizon").

ICAAP establishes a framework for banks to perform a comprehensive assessment of the risks they face and relate capital to those risks. The capital analysis performed by the Bank is expected to encompass all risks, not just the risks captured by the Basel III Pillar 1 minimum regulatory capital calculation. Successful risk identification and measurement requires having a comprehensive process to quantify measure and aggregate these various risks in order to ensure that the Bank's capital resources are sufficient to cushion volatility in earnings due to unexpected losses.

The authority to develop the ICAAP document is delegated to the Finance department. The Bank's Chief Financial Officer ("CFO") is responsible for the production of ICAAP with inputs from Front Line Units ("Businesses" or "Business"), Independent Risk Management and Control Functions. Enterprise-wide functions, including Global Markets and Financial Risk ("GMFR") and Enterprise Capital Management ("ECM") also review the ICAAP to ensure adequate challenge and consistency with Enterprise practices.

The Bank has established an Internal Capital Guideline ("IGL") and maintains capital levels in excess of this guideline. Bank has set up a "Tripwire" above the IGL to serve as an early warning signal to prompt action and avoid a capital breach.

The ICAAP document is presented to the Asset Liability Committee ("ALCO") and the Local Management Team ("LMT") for final review and approval on an annual basis. The ICAAP is also validated by Corporate Audit periodically, as required under RBI guidelines.

ICAAP is an integral management tool for determining the adequacy of the Bank's capital resources throughout the ICAAP planning horizon. It is also utilized to assess the risks being faced by the Bank and assess the adequacy of BANA India's capital under Baseline as well as Stress Scenarios over the ICAAP Planning Horizon. The ALCO and the LMT are responsible for acting at an early stage to prevent capital from falling below the minimum levels required to support risk characteristics.

#### **Capital Requirements for Pillar 1 risks (i.e. Credit Risk, Market Risk and Operational Risk)**

The Bank has adopted Standardized Approach ("SA") for credit risk, Standardized Duration Approach ("SDA") for market risk and Basic Indicator Approach ("BIA") for operational risk for computing its capital requirement.

Under the SA for credit risk, the Bank relies upon the ratings issued by the external credit rating agencies specified by the RBI for assigning risk weights for capital adequacy purposes under the Basel III guidelines. The risk weights applicable for claims against banks, sovereign, corporate and other Assets are as per the Basel III guidelines. In compiling the credit exposures, the Bank has not availed any credit risk mitigation techniques as permitted by the RBI.

Under the SDA for computing the capital requirement for market risk, the Bank has adopted the "duration" method.

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

The minimum capital requirement for market risk is computed in terms of:

- a. "Specific risk" charge for each security, to protect against an adverse movement in the price of an individual security owing to factors related to the individual issuer.
- b. "General market risk" charge towards interest rate risk in the portfolio, where long and short positions in different securities or instruments can be offset.

Under the BIA, the Bank holds capital for operational risk equal to 15% of average positive gross annual income for the previous three financial years.

## II. Quantitative disclosures

### Capital Structure as on September 30, 2020

	INR Million
Common Equity Tier 1	111,626
Additional Tier 1	-
Tier 2	6,196
<b>Total Capital Funds</b>	<b>117,822</b>

### Capital Structure as on March 31, 2020

	INR Million
Common Equity Tier 1	110,092
Additional Tier 1	-
Tier 2	5,909
<b>Total Capital Funds</b>	<b>116,001</b>

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

## Capital requirement and CRAR

<i>INR Million</i>	30-Sep-20	31-Mar-20
<b>Capital requirements for credit risk:</b>		
- Portfolios subject to standardized approach	57,674	62,542
- Securitization exposures	-	-
<b>Capital requirements for market risk:</b>		
Interest rate risk		
- General market risk	17,194	18,062
- Specific risk	23	-
Equity risk		
- General market risk	-	-
- Specific risk	-	-
Foreign exchange risk (including gold)	1,676	1,396
<b>Capital requirements for operational risk:</b> (Basic indicator approach)	6,071	6,071
<b>Total Capital Requirements</b>	<b>82,638</b>	<b>88,071</b>
Common Equity Tier I capital ratio	18.07%	16.72%
Tier I capital ratio	18.07%	16.72%
Tier II capital ratio	1.00%	0.90%
<b>Total capital ratio</b>	<b>19.07%</b>	<b>17.62%</b>



# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

### Risk Exposure and Assessment

Risk management is a disciplined approach to identify, analyse, assess and control unacceptable risk to minimize the volatility of financial results, drive sustainable earnings and protect the Bank's brand and reputation. The Bank takes a comprehensive approach to risk management, integrating it with strategic, capital and financial operating plans. Risk management and capital utilization are integral parts of the strategic planning process and are considered throughout the process to align the Business strategies with capital considerations. This holistic approach promotes the risk versus reward analysis needed to make informed strategic and business decisions.

Bank of America's Risk Framework requires that strong risk management practices are integrated in key strategic, capital and financial planning processes and in day-to-day business processes, thereby ensuring risks are appropriately considered, evaluated and responded to in a timely manner.

The front line units have primary responsibility for managing risks inherent in their businesses. The bank employs an effective risk management process, referred to as Identify, Measure, Monitor and Control ("IMMC"), as part of its daily activities.

Some of the risks that the Bank is exposed to are described below:

- Credit risk is the risk of loss arising from the inability or failure of a borrower or counterparty to meet its obligations. BANA India manages credit risk to a borrower or counterparty based on its risk profile, which includes assessing repayment sources, underlying collateral, if any, and the expected effects of the current and forward-looking economic environment on the borrowers or counterparties. Underwriting, credit management and credit risk limits are proactively reassessed as a borrower's or counterparty's risk profile changes.
- Market risk is the risk of loss due to changes in the market values of the Bank's assets and liabilities caused by changing interest rates, currency exchange rates, and security prices. Market risk is inherent in the Bank's operations and arises from both trading and non-trading positions. Trading exposures represent positions taken in a wide range of financial instruments and markets which expose the Bank to various risks, such as interest rate risk, foreign exchange risk, etc. The Bank manages these risks by using trading strategies and other hedging actions which encompass a variety of financial instruments in both the cash and derivatives markets. Key market risk exposures are assessed at both specific and aggregate levels. At the specific level, market risk sensitivities are assessed by evaluating the impact of individual risk factors such as interest rates and foreign exchange. At the aggregate level, market risk is assessed using two key measures, which are Value-at-Risk ("VaR") and Bi-Weekly Maximum Observed Loss ("MoL").
- Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. BANA India manages the operational risks of its business activities using the enterprise-wide Operational Risk Framework. Enterprise Operational Risk policies, processes, tools, and standards are implemented by the Businesses/ECFs with Oversight from the Independent Business/ECF Risk

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

Teams (Regional Function). Each have a quality assurance role and through direct action or Oversight, these stakeholders are collectively responsible for execution of the Operational Risk Program requirements, achievement of risk management objectives, and ensuring timely action is taken in response to concerns and issues.

- Strategic risk is the risk resulting from incorrect assumptions about external or internal factors, inappropriate business plans (e.g., too aggressive, wrong focus, ambiguous); ineffective business strategy execution; or failure to respond in a timely manner to changes in the regulatory, macroeconomic or competitive environments in the geographic locations in which we operate (such as competitor actions, changing customer preferences, product obsolescence and technology developments).
- Liquidity risk is the inability to meet expected or unexpected cash flow and collateral needs while continuing to support our businesses and customers under a range of economic conditions. The primary objective of liquidity risk management is to ensure that BANA India can meet expected or unexpected cash flow and collateral needs while continuing to support our businesses and customers with the appropriate funding sources, under a range of economic conditions.
- Reputational risk is the risk that negative perceptions regarding BANA India's conduct or business practices may adversely impact its profitability or operations. Reputational risk may result from many of the bank's activities, including those related to the management of strategic, operational, compliance and credit risks. As a result, the potential impact to the bank's reputation of all our activities and all risks we face is evaluated. Reputational risk may arise from negative perception on the part of key stakeholders (e.g., customers, counterparties, investors, regulators, rating agencies), scrutiny from external parties (e.g., politicians, consumer groups, media organizations) and the ongoing threat of litigation. These reputational risk events could adversely impact the bank's financial standing through an inability to maintain or establish business relationships.
- Compliance risk is the risk of legal or regulatory sanctions, material financial loss or damage to the reputation of the Bank arising from the failure of the Bank to comply with the requirements of applicable laws, rules, regulations, related self-regulatory organizations' standards and codes of conduct. BANA India manages compliance risk through an integrated set of controls and processes to address external and internal risks, including a complex and dynamic regulatory environment and the evolving products, services and strategies of the front line units and control functions
- Interest Rate Risk in Banking Book (IRRBB) refers to the potential adverse financial impact on the Bank's net interest income from changes in interest rates. Due to the fundamental nature of its business, the Bank carries various interest sensitive assets and liabilities in its balance sheet. This exposes the Bank to risk on from changes in interest rates. These assets and liabilities essentially reside in the banking book. In other words, IRRBB refers to the risk associated with interest rate sensitive instruments that are not held in the trading book of the Bank. Interest rate risk in the trading book is covered in the market risk section.
- Credit concentration risk arises due to imperfect diversification of credit exposures in two ways. One, by having very large exposures to a small set of obligors due to which, default by a big customer could result in a huge loss. This is known as name (single/group) concentration risk. Second type of concentration is due

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

to excessive exposure to a particular industry sector. It is observed that defaults in a particular industry sector are generally correlated. Hence, if an industry is under a severe recession, it could result in multiple defaults leading to huge losses.

- Other Risks
  - **Securitization Risk**  
The Bank, as of September 30, 2020, does not have any such investments. The bank has also not securitized any of its assets
  - **Settlement Risk** arises out of exposures on counterparties during the settlement of a deal when the Bank has performed its obligation in the contract and the counterparty is yet to perform its part (either delivery or payment). It is of transient nature; and may arise from counterparty default, operational problems, market liquidity constraints and other factors.
  - **Pension obligation risk** is the risk of a shortfall of pension funds available in the future to meet pension obligations for its eligible employees. The Bank provides for its pension liability which is a defined contribution scheme, for all its eligible employees.
  - **Model Risk** is the potential for adverse consequences from decisions based on incorrect or misused model output and reports. The Enterprise Model Risk Policy ("EMRP") provides comprehensive guidance for understanding monitoring, and managing model risk at Bank of America. The EMRP is consistent with applicable rules and regulations, and establishes a framework of corporate responsibilities and standards for effectively managing model risk across the enterprise.
  - **Risk of Under-estimation of Credit Risk under the Standardized Approach**  
The use of standardized approach for calculating the Pillar 1 capital requirement in respect of credit risk is a conservative approach given the portfolio primarily consists of corporate customers with strong credit profiles and the credit risk in the portfolio is well managed by the credit risk management processes in place.

### Risk Governance

BANA India has the following senior management level local committees or groups for risk governance.

#### Local Management Team ("LMT")

The LMT is chaired by the Country Executive Officer of the Bank. It is the primary body which provides strategic direction to the Bank and ensures compliance with regulatory requirements and the internal policies of the Bank. It is responsible for branch governance and oversight of branch operations. It is also responsible for reviewing and approving new business and products. It reviews the country performance with respect to strategic objectives. The LMT holds meetings six times in a financial year or more frequently if required. The LMT reviews and approves the ICAAP on an annual basis or upon any revision in the interim.

#### Asset Liability Committee ("ALCO")

The ALCO is chaired by the Country Executive Officer of the Bank. The ALCO is responsible for establishing policies and providing directives to manage the structural balance sheet risks arising over time, resulting from the Bank's

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

business activities originating from the changing asset-liability mix. It provides management oversight of balance sheet, capital and liquidity management activities of the Bank. The ALCO holds meetings four times in a financial year or more frequently if required. The ALCO reviews and approves the ICAAP on an annual basis or upon any revision in the interim.

### **Risk Management Committee ("RMC")**

RMC is independently chaired by the Chief Risk Officer. RMC serves as an oversight body to provide strategic direction for a progressive risk management system and policies & strategy to be followed to mitigate the risks associated with the business. RMC comprises senior management of the Bank and representatives from front line units and relevant control & support functions. RMC meets at least on a quarterly basis.

### **Customer Service Committee ("CSC")**

Customer Service Committee ('CSC') is responsible for activities relating to customer service and client services issues. CSC meets four times in a year. The committee is chaired by Head - Banking Operations.

### **Audit Council**

The Audit Council assists LMT in exercising oversight of the effectiveness of the Bank's system of internal controls and policies and procedures for managing and accessing risk, integrity of the financial statements of the Bank, and compliance by the Bank with legal and regulatory requirements. The Council also provides direct oversight over the audit function. The Audit Council meets at least four times in a year.

#### **The Audit council is mainly responsible for:**

- Providing direction and overseeing the operation of the audit function in the Bank,
- Obtaining and reviewing half-yearly reports from the Compliance Officer, and
- Following up on issues raised in LFAR and discussing the financial statements

### **Technology Steering Committee ("TSC")**

The TSC is chaired by the Chief Information Officer ("CIO"). The Technology Steering Committee (TSC) oversees projects in partnership with the Regional / Global Technology and other Functional teams across the Bank including common infrastructure or other projects cutting across businesses or support groups. The TSC meets at least six times in a year or more frequent, if required.

#### **The TSC is mainly responsible for:**

- To assist the Executive Management in implementing Information technology ("IT") Strategy that has been approved by the by global/regional and local management forums,
- Setting project priorities, reviewing critical project status and milestones,
- Monitoring IT governance, risk and controls, and
- Providing regular updates to the India LMT on significant Technology matter

### **Returns Governance Group ("RGG")**

Returns Governance Group (RGG) was formed based on guidance by RBI in 'Approach Paper on Automated Data Flow from Banks' and guidance on Supervisory Program for Assessment of Risk and Capital (SPARC). RGG is the governance body responsible for providing oversight to all regulatory submissions, including Risk Based

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

Supervision. RGG, as required by RBI shall inter-alia comprise of representatives from Compliance, Business, Technology, etc. and perform inter-alia the following roles.

- Act as the owner of all the layers indicated in the end state from the process perspective and in the context of automated submission systems, ensure governance around Data Acquisition, Data conversion and Data submission.
- Provide oversight and guidance to Technology Steering Committee, which is currently managing the automation of regulatory reports, etc.
- Review and escalation point for Technology Steering Committee for handling change request for any new requirement by Reserve Bank and also handling ad-hoc queries.
- Ensuring governance that the metadata is as per the regulatory definitions.

### Table DF-3: Credit Risk: General Disclosures

#### I. Qualitative disclosures

Robust risk management policies and procedures are laid out in the Global Banking and Markets Core policy. It is supplemented by the Credit Compliance Manual. Written policies, procedures, standards, and guidelines are updated on a regular basis to provide a clear direction to officers for meeting the requirements for which they are accountable. Approval authority is vested via an Approval Grid which takes into account the quantum, internal risk rating and nature of exposure and the position/experience of the approver.

The Bank manages credit risk based on the risk profile of the borrower or counterparty, repayment sources, the nature of underlying collateral, and other support given current events, conditions and expectations. Credit risk management begins with an assessment of the credit risk profile of the borrower or counterparty based on an analysis of their financial position. As part of the overall credit risk assessment of a borrower or counterparty, credit exposures are assigned a risk rating and are subject to approval based on defined credit approval standards. High Value Proposals are subject to approvals by Credit Approval Council ("CAC"). Subsequent to loan origination, risk ratings are monitored on an ongoing basis. If necessary, risk ratings are adjusted to reflect changes in the financial condition and cash flow of a borrower or counterparty.

BANA India follows the policy of internal rating on a scale of Risk Rating ("RR") 1-11, and the RR is regularly monitored. Exposures with RR of 8 or worse (criticized assets) are subject to additional scrutiny and monitoring.

Unhedged Foreign Currency Exposure ("UFCE") of the borrower is an area of risk for the individual entity as well as for the entire financial system; as entities who do not hedge their exposure may incur significant losses due to exchange rate movements, which in turn can reduce their capability to service the loans taken from the banks. In line with the RBI circular dated January 15, 2014, BANA India has put in place a process to ascertain the amount of UFCE, estimate the extent of likely loss and riskiness due to UFCE, and provide for incremental capital & make incremental provision, as warranted.

In order to address concentration risk in banking industry the RBI has issued 'Guidelines of Enhancing Credit Supply' requiring banks to create additional provision and also apply additional risk weights on specified borrowers effective April 01, 2018. BANA India has put in place a process to ensure compliance with requirements of the said guidelines/directions.

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

In accordance with RBI guidelines relating to COVID-19 Regulatory Package dated 27 March 2020, 17 April 2020 and 23 May 2020 ('RBI Circulars'), the Bank has implemented a LMT approved policy for borrowers who want to avail moratorium on the payment of overdraft facility / instalments and / or interest, as applicable.

### Definitions

- **Overdue:** Any amount due to Bank under any credit facility is 'overdue' if it is not paid by the due date.

### Norms for determining when to classify various types of assets as non-performing

- Term loans are treated as non-performing if the interest and/or installments of principal remain overdue for a period of more than 90 days.
- Cash credits & overdrafts are treated as non-performing if the accounts remain out of order for a period of more than 90 days.
- An account will be treated "out of order" if the outstanding balance remains continuously in excess of the sanctioned limit/drawing power. In case where the outstanding balance is less than the sanctioned limit/drawing power, but there are no credits continuously for 90 days as on balance-sheet date or credits are not enough to cover the interest debited during the same period, these accounts will be treated as out of order.
- Bills purchased/discounted are treated as non-performing if the bill remains overdue and unpaid for a period of more than 90 days.
- Any overdue receivables representing positive mark-to-market value of a foreign exchange and interest rate derivative contracts will be treated as non-performing asset if these remain unpaid for 90 days or more, upon becoming due
- Any other facility will be treated as non-performing if any amount to be received remains overdue for a period of more than 90 days during the financial year

## II. Quantitative disclosures

### a. Total Gross credit exposures

INR Million	30-Sep-20	31-Mar-20
Fund Based	322,205	413,650
Non-Fund Based <sup>1</sup>	158,188	165,714

### b. Geographic distribution

INR Million	30-Sep-20		31-Mar-20	
	Domestic	Overseas <sup>2</sup>	Domestic	Overseas <sup>2</sup>
Fund Based	322,205	-	413,650	-
Non-Fund Based <sup>1</sup>	158,188	-	165,714	-

<sup>1</sup>Includes market as well as non-market related exposures

<sup>2</sup>As per the clarification given in the guidelines for Pillar 3 disclosures, definition of Overseas and Domestic should be as adopted for segment reporting in compliance with Accounting Standard- 17 issued by ICAI. As the Bank does not have any overseas operations, all exposures are reported under domestic exposures.

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

## c. Distribution of Exposures by sector / industry

INR Million

Sr.no	Particulars	30-Sep-20		31-Mar-20	
		Funded Exposure	Non Funded Exposure*	Funded Exposure	Non Funded Exposure*
<b>1.</b>	<b>Agriculture &amp; Allied Activities</b>				
	Agri - Direct	-	-	-	-
	Agri - Indirect	-	25	75	20
	<b>1. Total</b>	<b>-</b>	<b>25</b>	<b>75</b>	<b>20</b>
<b>2.</b>	<b>Industry (Micro &amp; Small, Medium and Large)</b>				
a.	Construction	3,763	1,430	4,025	1,223
b.	Gems & Jewellery	-	-	-	-
c.	Cement & Cement products	-	-	-	-
d.	Infrastructure	16,324	4,072	35,649	3,124
e.	Textiles	-	503	1	502
f.	Basic metal and metal products	3,859	1,336	8,940	3,849
g.	Mining and Quarrying	180	11	128	11
h.	All Engineering	13,481	7,201	15,324	10,575
i.	Chemicals and chemical products	36,931	1,969	37,434	2,241
j.	Petroleum, coal products and nuclear fuels	12,524	5,351	11,651	4,332
k.	Vehicles, vehicle parts and transport equipments	15,346	1,859	13,943	1,978
l.	Beverage & Tobacco	6,164	361	9,240	353
m.	Food Processing	7,518	586	5,824	56
n.	Other Industries	202	99	389	100
o.	Paper & paper products	536	87	633	91
p.	Rubber, plastic & their products	1,373	241	2,395	73
q.	Leather & leather products	-	-	-	-
r.	Wood and Wood products	-	-	-	-
s.	Glass and glassware	-	-	-	-
	<b>2. Total</b>	<b>118,200</b>	<b>25,105</b>	<b>145,577</b>	<b>28,509</b>
<b>3.</b>	<b>Services</b>				
c.	Aviation	-	634	-	651
d.	Shipping	-	-	-	-
e.	Commercial Real Estate	-	-	-	-
b.	Banks	8,153	96,719	10,729	100,561
a.	Non Banking Financial Companies	25,736	6,570	49,192	6,307
t.	Computer Software	12,045	13,064	8,754	10,997
v.	Trade	15,166	2,246	13,046	2,099
f.	Other Services	133,345	10,544	172,727	13,257
e.	Professional and Other services	4,686	2,360	6,592	2,216
c.	Transport Operators	4,785	886	6,867	965
d.	Tourism Hotels and Restaurants	88	36	90	131
	<b>3. Total</b>	<b>204,004</b>	<b>133,058</b>	<b>267,998</b>	<b>137,184</b>
	<b>Grand Total</b>	<b>322,205</b>	<b>158,188</b>	<b>413,650</b>	<b>165,714</b>

\* Includes market as well as non-market related exposures

Note: Previous year figures have been regrouped and reclassified wherever necessary to confirm to current year's presentation

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

## d. Residual contractual maturity pattern for assets.

## As of September 30, 2020

INR Million

Particulars	Cash	Advances	Balance with RBI	Balances with other Banks	Fixed Assets	Investments	Other Assets
Next Day	42	2,571	258	50,353	-	262,849	610
2 - 7 days	-	4,177	-	-	-	-	1
8-14 days	-	9,945	-	-	-	-	1
15-30 days	-	19,917	3,177	-	-	16,436	-
31 days to 2 month	-	26,262	431	-	-	2,229	-
2-3 months	-	31,689	1,079	-	-	5,583	83,989
3-6 months	-	46,710	317	-	-	1,642	4,505
6 months to 1 year	-	14,135	506	-	-	16,311	-
1-3 years	-	21,806	3,975	-	-	20,562	-
3-5 years	-	816	1	-	-	7	-
5-7 years	-	-	0	-	-	0	-
7-10 years	-	-	1	-	-	3	-
10-15 years	-	-	0	-	-	0	-
Over 15 years	-	-	-	-	931	-	4,550
<b>TOTAL</b>	<b>42</b>	<b>178,028</b>	<b>9,745</b>	<b>50,353</b>	<b>931</b>	<b>325,622</b>	<b>93,656</b>

## As of March 31, 2020

INR Million

Particulars	Cash	Advances	Balance with RBI	Balances with other Banks	Fixed Assets	Investments	Other Assets
Next Day	41	3,879	1,223	103,042	-	143,734	856
2 - 7 days	-	14,698	-	-	-	31,686	3
8-14 days	-	12,348	-	1,879	-	-	6
15-30 days	-	43,093	4,813	-	-	25,617	-
31 days to 2 month	-	27,937	1,537	-	-	8,182	-
2-3 months	-	22,948	1,192	-	-	6,344	103,116
3-6 months	-	49,716	416	-	-	2,211	4,568
6 months to 1 year	-	18,172	426	-	-	2,269	-
1-3 years	-	39,731	3,920	-	-	36,522	-
3-5 years	-	3,369	2	-	-	-	-
5-7 years	-	-	0	-	-	0	-
7-10 years	-	-	1	-	-	-	-
10-15 years	-	-	0	-	-	0	-
Over 15 years	-	-	-	-	1,131	-	5,554
<b>TOTAL</b>	<b>41</b>	<b>235,891</b>	<b>13,530</b>	<b>104,921</b>	<b>1,131</b>	<b>256,565</b>	<b>114,103</b>



# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

**e. Amount of NPAs (Gross) – Nil** (March 31, 2020 – Nil)

**f. Net NPAs – Nil** (March 31, 2020 – Nil)

### g. NPA Ratios

- Gross NPA to Gross Advances – **Nil** (March 31, 2020 – Nil)

- Net NPA to Net Advances – **Nil** (March 31, 2020 – Nil)

### h. Movement of NPAs (Gross)

<i>INR Million</i>	30-Sep-20	31-Mar-20
Opening balance	-	-
Additions during the year	-	2.24
Reductions during the period	-	2.24
Closing balance	-	-

### i. Movement of provision for NPAs

<i>INR Million</i>	30-Sep-20	31-Mar-20
Opening balance	-	-
Provisions made during the year	-	0.56
Write-off	-	-
Write-back of excess provisions	-	0.56
Closing balance	-	-

**k. Non-Performing Investments: Nil** (March 31, 2020 – Nil)

**l. Provisions for Non-Performing Investments – Nil** (March 31, 2020 – Nil)

### m. Movement of provision for Depreciation on Investments

<i>INR Million</i>	30-Sep-20	31-Mar-20
Opening balance	265	-
Provisions made during the year	958	265
Write-off	-	-
Write-back of excess provisions	-	-
Closing balance	1,223	265

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

## Table DF-4 - Credit Risk: Disclosures for Portfolios Subject to the Standardised Approach

## I. Qualitative disclosures

The Bank adopts the following basis for assignment of risk weights for different categories of counterparties:

**a. Scheduled Banks including foreign bank branches in India:**

The bank has applied risk weights on exposures to scheduled banks for the purpose of Pillar 1 calculation in line with Basel III regulations as prescribed by RBI.

**b. Foreign Banks:**

Ratings for foreign banks have been sourced from websites of Fitch, Moody's and Standard & Poor's. The bank has applied risk weights relevant to the ratings assigned by international credit rating agencies as prescribed by RBI. In case of unrated exposures, bank has applied risk weights as prescribed by RBI guidelines.

**c. Corporates:**

Where the obligors have obtained rating of the facility from any of the accredited credit rating agencies viz. Brickwork Ratings India Pvt. Limited, Credit Analysis & Research Limited (CARE), CRISIL Limited, ICRA Limited (ICRA), India Ratings and Research Private Limited (Fitch), SME Rating Agency of India Ltd. (SMERA) as specified by the RBI, the Bank has applied the risk weights relevant to the ratings assigned by the credit rating agencies. Unrated corporate exposures have been risk weighted at 150% as per RBI guidelines.

## II. Quantitative disclosures

**a. Total Gross credit exposures**

<i>INR Million</i>	30-Sep-20	31-Mar-20
<b>Fund Based</b>		
Below 100% risk weight	207,490	263,883
100% risk weight	4,496	7,102
More than 100% risk weight	110,219	142,665
Deducted	-	-
<b>Total</b>	<b>322,205</b>	<b>413,650</b>

<i>INR Million</i>	30-Sep-20	31-Mar-20
<b>Non-Fund Based <sup>5</sup></b>		
Below 100% risk weight	104,644	109,391
100% risk weight	1,045	1,694
More than 100% risk weight	52,499	53,629
Deducted	-	-
<b>Total</b>	<b>158,188</b>	<b>165,714</b>

<sup>5</sup>Includes market as well as non-market related exposures.

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

### Table DF-5: Credit Risk Mitigation: Disclosures for Standardized Approaches

#### I. Qualitative disclosures

In determining credit risk capital, the Bank has not reduced the facility amounts by any corresponding eligible collateral amount in the form of cash margins.

The risk weighted assets are computed based on the gross outstanding facility amount.

#### II. Quantitative disclosures

The Bank has not availed Credit Risk Mitigation Techniques ("CMT") as at September 30, 2020

### Table DF-6: Securitization Exposures: Disclosure for Standardized Approach

#### I. Qualitative disclosures

There are no securitization transactions originated by the Bank.

#### II. Quantitative disclosures

##### A. Banking Book

Total amount of exposures securitized by the Bank: **Nil** (March 31, 2020: Nil)

Amount of assets intended to be securitized within a year: **Nil** (March 31, 2020: Nil)

Total amount of assets securitized and unrecognized gain or losses on sale: **Nil** (March 31, 2020: Nil)

#### Aggregate amount of on-balance sheet and off-balance sheet securitization exposures purchased and break-up by exposure type

<i>INR Million</i>	30-Sep-20		31-Mar-20	
	Exposure Type	Exposure Amount	Exposure Type	Exposure Amount
On Balance Sheet	-	-	-	-
Off Balance Sheet	-	-	-	-
Total		-		-

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

**Securitization exposures purchased and the associated capital charge by different risk weight bands**

	As at 30-Sep-2020			As at 31-Mar-2020		
	Exposure	Risk Weighted Assets	Capital Requirement	Exposure	Risk Weighted Assets	Capital Requirement
<i>INR Million</i>						
Below 100% risk weight	-	-	-	-	-	-
100% risk weight	-	-	-	-	-	-
More than 100% risk weight	-	-	-	-	-	-
<b>Total</b>	-	-	-	-	-	-

Securitization Exposures deducted entirely from Tier 1 capital, credit enhancing Interest Only Strips (I/Os) deducted from total capital, and other exposures deducted from total capital: Nil (March 31, 2020: Nil)

**B. Trading book**

- Aggregate amount of exposures securitised by Bank for which bank has retained some exposures and which is subject to market risk approach: **Nil** (March 31, 2020: Nil)
- Aggregate amount of on-balance sheet securitisation exposures retained or purchased: **Nil** (March 31, 2020: Nil)
- Aggregate amount of off-balance sheet securitisation exposures: **Nil** (March 31, 2020: Nil)
- Aggregate amount of securitization exposures retained or purchased subject to Comprehensive Risk Measure for specific risk : **Nil** (March 31, 2020: Nil)
- Aggregate amount of securitization exposures retained or purchased subject to securitization framework for specific risk broken into different risk weight bands: **Nil** (March 31, 2020: Nil)
- Aggregate amount of capital requirements for the securitisation exposures subject to securitisation framework: **Nil** (March 31, 2020: Nil)
- Securitisation Exposures deducted entirely from Tier 1 capital, credit enhancing Interest Only Strips (I/Os) deducted from total capital, and other exposures deducted from total capital: **Nil** (March 31, 2020: Nil)

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

### Table DF-7: Market Risk in Trading Book

#### I. Qualitative disclosures

Market risk is the risk of loss due to changes in the market values of the Bank's assets and liabilities caused by changing interest rates, currency exchange rates, and security prices. Market risk is inherent in the Bank's operations and arises from both trading and non-trading positions. Trading exposures represent positions taken in a wide range of financial instruments and markets which expose the Bank to various risks, such as interest rate risk, foreign exchange risk, etc. The Bank manages these risks by using trading strategies and other hedging actions which encompass a variety of financial instruments in both the cash and derivatives markets.

Key market risk exposures are assessed at both specific and aggregate levels. At the specific level, market risk sensitivities are assessed by evaluating the impact of individual risk factors such as interest rates and foreign exchange. At the aggregate level, market risk is assessed using two key measures, which are Value-at-Risk ("VaR") and Bi-Weekly Maximum Observed Loss ("MoL").

VaR is a statistical measure of potential portfolio market value loss resulting from changes in market variables, during a given holding period, measured at a specified confidence level. The Branch uses historical simulation approach for VaR and it is calculated over a one-day holding period at a 99% confidence level, using three years of historical data. The performance of VaR model is monitored through daily back-testing and is performed at both Entity and Line of Business (LoB) level. MOL is the potential market value loss on a portfolio over a 10-day holding period using historical data with start date anchored to January 1<sup>st</sup>, 2007

VaR and MOL are supplemented with stress tests, which are performed to assess extreme tail events or shocks. The stress tests are designed to highlight exposures to unlikely but plausible events or extremely volatile conditions, both hypothetically and historically.

#### Market Risk Management Architecture

The market risk function is independent of the front office and monitors all prudential limits governing trading activities and reports exceptions to senior management.

#### Market Risk Management Control

Market risk of the Branch is primarily managed through establishing and monitoring limits. Investment policy and FX/derivatives policy of the Branch (or BANA Mumbai) lists the applicable limits and approval processes.

Market Risk Management utilizes a suite of reports which assess risk on a daily basis. These reports are distributed to Senior Management on daily basis. Limit excesses, limit changes (temporary, or permanent) are communicated to Senior Management, as well as to relevant forum such as the LMT, Risk management Committee and the ALCO where applicable.

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

### Market Risk Management Policies and Procedures

The Market Risk Management is guided by market risk policies and guidelines. Global market risk management policy is in place and is followed. The policy describes how market risk is managed by establishing the key market risk measures, defining roles and responsibilities and describing key monitoring processes in place. In addition, the Investment policy and FX/derivatives policy of the Branch lists the applicable limits and approval processes.

The market risk capital requirement is expressed in terms of two separately calculated charges:

- General market risk charge from the interest rate risk in the portfolio in different securities or instruments.
- Specific risk charge for each security, which is designed to protect against an adverse movement in the price of an individual security owing to factors related to the individual issuer.

For regulatory capital, the requirements for general market risk are designed to capture the risk of loss arising from changes in market prices and interest rates. The capital charge is the sum of four components:

- the net short or long position in the whole trading book.
- a small proportion of the matched positions in each time-band - vertical disallowance.
- a larger proportion of the matched positions across different time bands - horizontal disallowance.
- a net charge for positions in options.

The general market risk charge is measured by using the modified duration method. Foreign exchange open positions (higher of limit or actual) are risk-weighted at 100%.

### II. Quantitative disclosures

<i>INR Million</i>	30-Sep-20	31-Mar-20
<b>Capital requirements for:</b>		
Interest rate risk		
- general market risk	17,194	18,062
- specific risk	23	-
Equity position risk	-	-
- general market risk	-	-
- specific risk	-	-
Foreign exchange risk	1,676	1,396
<b>Total</b>	<b>18,893</b>	<b>19,458</b>

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

### Table DF-8: Operational Risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events.

Operational Risk Events: inadequate or failed internal processes, people, systems and external events may result in unexpected or undesired consequences including a financial loss, an unexpected gain, a near miss and/or an opportunity cost (lost future revenue). The events associated with these unintended and/or undesired consequences are termed as operational risk events.

Operational Loss: an operational loss is the recorded financial consequence (excluding insurance reimbursements or tax effects) resulting from an operational loss event, including all expenses associated with an operational loss event except for opportunity costs, foregone revenue, and costs related to risk management and control enhancements implemented to prevent future operational losses. Operational loss events can also result in unintended financial gains. BAC classifies operational losses using the Basel II categories and definitions: Internal Fraud; External Fraud; Employment Practices and Workplace Safety; Clients, Products, and Business Practices; Damage to Physical Assets; Business Disruption and System Failures; and Execution, Delivery, and Process Management.

BANA India manages the operational risks of its business activities using the enterprise-wide Operational Risk Framework. Enterprise Operational Risk policies, processes, tools, and standards are implemented by the Businesses/ECFs with Oversight from the Independent Business/ECF Risk Teams (Regional Function). Each have a quality assurance role and through direct action or Oversight, these stakeholders are collectively responsible for execution of the Operational Risk Program requirements, achievement of risk management objectives, and ensuring timely action is taken in response to concerns and issues.

#### **Governance of Operational Risk**

Operational risk is managed by all employees as part of our day-to-day activities. Front line units and control functions own operational risk and are responsible for monitoring, assessing and testing the effectiveness of controls, while continuing to identify, escalate, debate and report operational risks. Front line units / control functions may have business Oversight or control teams that support business leaders in the implementation of the program.

The Operational Risk management function at Bank of America (BAC) is independent of front line unit / control function, and is responsible for designing the program and overseeing its implementation and execution in accordance with the Policy and its supporting Standards. Operational Risk Teams are also responsible for objectively assessing, challenging and advising the front line units / control functions on operational risk;

#### **Risk Management Process**

BAC's Operational Risk Management Program has been built around ten interrelated requirements that are set out in the Operational Risk Management - Enterprise Policy, which also specifies the responsibilities and accountabilities of the first and second lines of defense. These requirements work together to drive a comprehensive risk-based approach for the proactive identification, management, mitigation and escalation of operational risks throughout the Company. These ten core requirements are:

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

- 1) Operational risk appetite
- 2) Key Risk Indicators
- 3) Risk and Control Self- Assessment
- 4) Scenario Analysis
- 5) Internal Operational Loss Event Data
- 6) External Operational Loss Event Data
- 7) Quality Assurance (QA) Program
- 8) Operational Risk Coverage Plans
- 9) Operational Risk Reporting and Escalation
- 10) Operational Risk Capital Model Oversight.



# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

### Table DF-9: Interest Rate Risk in the Banking Book (IRRBB)

#### I. Qualitative disclosures

Interest Rate Risk in Banking Book (IRRBB) refers to the potential adverse financial impact on the Bank's net interest income from changes in interest rates. Due to the fundamental nature of its business, the bank carries various interest sensitive assets and liabilities in its balance sheet. This exposes the Bank to risk on from changes in interest rates. These assets and liabilities essentially reside in banking book. In other words, IRRBB refers to risk associated with interest rate sensitive instruments that are not held in the trading book of the Bank. Interest rate risk in the trading book is covered in the market risk section

Presently the Bank uses the following tools for managing interest rate risk:

**Gap analysis:** The interest rate gap or mismatch risk is measured by calculating gaps over different time intervals at a given date. This static analysis measures mismatches between rate sensitive liabilities ("RSL") and rate sensitive assets ("RSA"). The report is prepared monthly by grouping rate sensitive liabilities, assets and off-balance sheet positions into time buckets according to residual maturity or next re-pricing period, whichever is earlier. The difference between RSA and RSL for each time bucket signifies the gap in that time bucket. The direction of the gap indicates whether net interest income is positively or negatively impacted by a change in interest rates and the magnitude of the gap helps in assessing the change in net interest income for any given interest rate shift. The interest rate sensitivity/gap reports are reviewed by the ALCO on a regular basis.

**Earnings at risk ("EaR"):** The interest rate gap reports mentioned above indicate whether the Bank is in a position to benefit from rising interest rates by having a positive gap ( $RSA > RSL$ ) or whether it is in a position to benefit from declining interest rates by having a negative gap ( $RSL > RSA$ ). EaR measures the change in NII over a one year time horizon for various levels of parallel shift in interest rates.

**Economic value:** Change in the interest rates have a long-term impact on the capital position of the Bank, as the economic value of the Bank's assets, liabilities and off-balance sheet positions get affected by these rate changes. The Bank applies a modified duration approach and monitors impact of various levels of parallel shift in interest rate curves on the capital position. The interest rate sensitivity/gap reports are reviewed by the ALCO on a regular basis.

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

**II. Quantitative disclosures**

The increase / (decline) in earnings and economic value (on a pre-tax basis) for an upward/downward rate shock broken down by currency is as below

**a. Impact on net interest income over the next 12 months (earnings perspective)**

<i>INR Million</i>	30-Sep-2020		31-Mar-2020	
	If interest rate were to go up by 100 basis points	If interest rate were to go down by 100 basis points	If interest rate were to go up by 100 basis points	If interest rate were to go down by 100 basis points
<b>Currency</b>				
INR	(315)	315	(877)	877
USD	159	(159)	137	(137)
Others	10	(10)	2	(2)
<b>Total</b>	<b>(156)</b>	<b>156</b>	<b>(738)</b>	<b>738</b>

**b. Impact on market value of equity (economic value perspective):**

<i>INR Million</i>	30-Sep-2020		31-Mar-2020	
	If interest rate were to go up by 200 basis points	If interest rate were to go down by 200 basis points	If interest rate were to go up by 200 basis points	If interest rate were to go down by 200 basis points
<b>Currency</b>				
INR	4,023	(4,023)	3,478	(3,478)
USD	1,234	(1,234)	911	(911)
Others	43	(43)	57	(57)
<b>Total</b>	<b>5,300</b>	<b>(5,300)</b>	<b>4,446</b>	<b>(4,446)</b>

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

### Table DF-10: General Disclosure for Exposures Related to Counterparty Credit Risk

#### **I. Qualitative disclosures**

##### **Discussion of methodology used to assign economic capital and credit limits for counterparty credit exposures;**

A credit approval document is used to analyze the counterparty's creditworthiness, document transaction structure and risk mitigation, and approve the Traded Products limit(s). Specific requests, including limit structure and attributes is also included in the credit approval document. BANA India adopts standardized model and does not assign economic capital for counterparty credit exposures.

##### **Discussion of policies for securing collateral and establishing credit reserve**

Collateralization is one of the key credit risk mitigation techniques available in the market. The term "Collateral" means assets pledged as security to ensure payment or performance of an obligation. When facing derivative counterparties, BAC enters into master netting arrangements and, in appropriate circumstances, collateral arrangements which provide in the event of a customer default, the right to liquidate collateral and the right to offset counterparty's rights and obligations. BAC also monitors the fair market value of the underlying securities used as collateral, including accrued interest, and, as necessary, requests additional collateral to ensure that the relevant transactions are adequately collateralized. BANA India makes appropriate provisions for credit risk as per regulatory guidelines.

##### **Discussion of policies with respect to wrong-way risk exposures**

Transactions that include significant positive correlation between the performance of the counterparty and the exposure profile of the underlying product are called Wrong Way Risk ("WWR") trades. The BAC Wrong Way Risk Policy outlines the characteristics of WWR trades, and describes the approval escalation requirements and associated monitoring and reporting of WWR exposure.

##### **Discussion of the impact of the collateral the bank would have to provide given a credit rating downgrade**

As per local contractual agreements, BANA India is not required to post any collateral given a credit rating downgrade.

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

## II. Quantitative disclosures

## As at September 30, 2020

<i>INR Million</i>	Forward Exchange Contracts	Interest Rate Derivative Contracts	Cross Currency Swaps	Options
Gross positive fair value of contracts	39,283	42,963	764	266
Netting benefits	31,726	-	-	-
Netted current credit exposure (positive mark-to-market)	7,557	42,963	764	266
Collateral held*	-	-	-	-
Net derivatives credit exposure	7,557	42,963	764	266
Exposure at default under Current Exposure Method	117,044	79,536	6,281	2,886

*INR Million*

Notional value of credit derivative hedges

Institution's own credit portfolio

- Protection bought
- Protection sold

Not Applicable

Institution's Intermediation activity credit portfolio

- Protection bought
- Protection sold

## As at March 31, 2020

<i>INR Million</i>	Forward Exchange Contracts	Interest Rate Derivative Contracts	Cross Currency Swaps	Options
Gross positive fair value of contracts	53,228	45,394	920	472
Netting benefits	43,072	-	-	-
Netted current credit exposure (positive mark-to-market)	10,156	45,394	920	472
Collateral held*	-	-	-	-
Net derivatives credit exposure	10,156	45,394	920	472
Exposure at default under Current Exposure Method	84,615	86,461	7,441	2,753

*INR Million*

Notional value of credit derivative hedges

Institution's own credit portfolio

- Protection bought
- Protection sold

Not Applicable

Institution's Intermediation activity credit portfolio

- Protection bought
- Protection sold

Note: Previous year figures have been regrouped and reclassified wherever necessary to confirm to current year's presentation.

\* The Bank has not availed any Credit Risk Mitigation Techniques

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

Table DF-11: Composition of Capital

Sr. no	Particulars	Amt in INR Million	Amounts Subject to Pre-Basel III Treatment	Reference No.
<b>Common Equity Tier 1 capital: instruments and reserves</b>				
1.	Directly issued qualifying common share capital plus related stock surplus (share premium)	31,883		A1
2.	Retained earnings	79,813		A2+A3
3.	Accumulated other comprehensive income (and other reserves)	-		
4.	Directly issued capital subject to phase out from CET1 (only applicable to non-joint stock companies <sup>1</sup> )	-		
5.	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)	-		
6.	<b>Common Equity Tier 1 capital before regulatory adjustments</b>	<b>111,696</b>		
<b>Common Equity Tier 1 capital: regulatory adjustments</b>				
7.	Prudential valuation adjustments	-		
8.	Goodwill (net of related tax liability)	-		
9.	Intangibles (net of related tax liability)	70		C1
10.	Deferred tax assets	-	-	
11.	Cash-flow hedge reserve	-		
12.	Shortfall of provisions to expected losses	-		
13.	Securitisation gain on sale	-		
14.	Gains and losses due to changes in own credit risk on fair valued liabilities	-		
15.	Defined-benefit pension fund net assets	-		
16.	Investments in own shares (if not already netted off paid-in capital on reported balance sheet)	-		
17.	Reciprocal cross-holdings in common equity	-		
18.	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued share capital (amount above 10% threshold)	-		
19.	Significant investments in the common stock of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions (amount above 10% threshold)	-		
20.	Mortgage servicing rights (amount above 10% threshold)	-		
21.	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability)	-		
22.	Amount exceeding the 15% threshold	-		
23.	of which: significant investments in the common stock of financial entities	-		
24.	of which: mortgage servicing rights	-		
25.	of which: deferred tax assets arising from temporary differences	-		
26.	National specific regulatory adjustments (26a+26b+26c+26d)	-		
26a	of which: Investments in the equity capital of the unconsolidated insurance subsidiaries	-		

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

26b	of which: Investments in the equity capital of unconsolidated non-financial subsidiaries	-		
26c	of which: Shortfall in the equity capital of majority owned financial entities which have not been consolidated with the bank	-		
26d	of which: Unamortised pension funds expenditures	-		
27.	Regulatory adjustments applied to Common Equity Tier 1 due to insufficient Additional Tier 1 and Tier 2 to cover deductions	-		
<b>28.</b>	<b>Total regulatory adjustments to Common equity Tier 1</b>	<b>70</b>		
<b>29.</b>	<b>Common Equity Tier 1 capital (CET1)</b>	<b>111,626</b>		
30.	Directly issued qualifying Additional Tier 1 instruments plus related stock surplus (31+32)	-		
31.	of which: classified as equity under applicable accounting standards (Perpetual Non-Cumulative Preference Shares)	-		
32.	of which: classified as liabilities under applicable accounting standards (Perpetual debt Instruments)	-		
33.	Directly issued capital instruments subject to phase out from Additional Tier 1	-		
34.	Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group AT1)	-		
35.	of which: instruments issued by subsidiaries subject to phase out	-		
<b>36.</b>	<b>Additional Tier 1 capital before regulatory adjustments</b>	<b>-</b>		
<b>Common Equity Tier 1 capital: instruments and reserves</b>				
<b>Additional Tier 1 capital: regulatory adjustments</b>				
37.	Investments in own Additional Tier 1 instruments	-		
38.	Reciprocal cross-holdings in Additional Tier 1 instruments	-		
39.	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above 10% threshold)	-		
40.	Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)	-		
41.	National specific regulatory adjustments (41a+41b)	-		
41a	Investments in the Additional Tier 1 capital of unconsolidated insurance subsidiaries	-		
41b	Shortfall in the Additional Tier 1 capital of majority owned financial entities which have not been consolidated with the bank	-		
42.	Regulatory adjustments applied to Additional Tier 1 due to insufficient Tier 2 to cover deductions	-		
<b>43.</b>	<b>Total regulatory adjustments to Additional Tier 1 capital</b>	<b>-</b>		
<b>44.</b>	<b>Additional Tier 1 capital (AT1)</b>	<b>-</b>		
<b>45.</b>	<b>Tier 1 capital (T1 = CET1 + AT1) (29 + 44)</b>	<b>111,626</b>		
<b>Tier 2 capital: instruments and provisions</b>				
46.	Directly issued qualifying Tier 2 instruments plus related stock surplus	-		
47.	Directly issued capital instruments subject to phase out from Tier 2	-		
48.	Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier 2)	-		
49.	of which: instruments issued by subsidiaries subject to phase out	-		
50.	Provisions	6,196		B1+B2+B3+B4+B5

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

<b>51.</b>	<b>Tier 2 capital before regulatory adjustments</b>	<b>6,196</b>		
52.	Investments in own Tier 2 instruments	-		
53.	Reciprocal cross-holdings in Tier 2 instruments	-		
54.	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above the 10% threshold)	-		
55.	Significant investments in the capital banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)	-		
56.	National specific regulatory adjustments (56a+56b)	-		
56a	of which: Investments in the Tier 2 capital of unconsolidated subsidiaries	-		
56b	of which: Shortfall in the Tier 2 capital of majority owned financial entities which have not been consolidated with the bank	-		
<b>57.</b>	<b>Total regulatory adjustments to Tier 2 capital</b>	<b>-</b>		
<b>58.</b>	<b>Tier 2 capital (T2)</b>	<b>6,196</b>		
<b>59.</b>	<b>Total capital (TC = T1 + T2) (45 + 58)</b>	<b>117,822</b>		
<b>60.</b>	<b>Total risk weighted assets (60a + 60b + 60c)</b>	<b>617,855</b>		
<b>60a</b>	of which: total credit risk weighted assets	431,209		
<b>60b</b>	of which: total market risk weighted assets	141,254		
<b>60c</b>	of which: total operational risk weighted assets	45,393		
<b>Capital ratios</b>				
<b>61.</b>	<b>Common Equity Tier 1 (as a percentage of risk weighted assets)</b>	<b>18.07%</b>		
<b>62.</b>	<b>Tier 1 (as a percentage of risk weighted assets)</b>	<b>18.07%</b>		
<b>63.</b>	<b>Total capital (as a percentage of risk weighted assets)</b>	<b>18.07%</b>		
64.	Institution specific buffer requirement (minimum CET1 requirement plus capital conservation and countercyclical buffer requirements plus G-SIB buffer requirement, expressed as a percentage of risk weighted assets)	<b>9.88%</b>		
65.	of which: capital conservation buffer requirement	<b>1.88%</b>		
66.	of which: bank specific countercyclical buffer requirement	-		
67.	of which: G-SIB buffer requirement	<b>2.50%</b>		
68.	Common Equity Tier 1 available to meet buffers (as a percentage of risk weighted assets) – (Point 61 – Point 71)	<b>9.07%</b>		
<b>National minima (if different from Basel III)</b>				
69.	National Common Equity Tier 1 minimum ratio (if different from Basel III minimum)	5.50%		
70.	National Tier 1 minimum ratio (if different from Basel III minimum)	7.00%		
71.	National total capital minimum ratio (if different from Basel III minimum)	9.00%		
<b>Amounts below the thresholds for deduction (before risk weighting)</b>				
72.	Non-significant investments in the capital of other financial entities	-		
73.	Significant investments in the common stock of financial entities	-		
74.	Mortgage servicing rights (net of related tax liability)	NA		

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

75.	Deferred tax assets arising from temporary differences (net of related tax liability)	-		
<b>Applicable caps on the inclusion of provisions in Tier 2</b>				
76.	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to standardised approach (prior to application of cap)	6,196		
77.	Cap on inclusion of provisions in Tier 2 under standardised approach	5,390		
78.	Provisions eligible for inclusion in Tier 2 in respect of exposures subject to internal ratings-based approach (prior to application of cap)	-		
79.	Cap for inclusion of provisions in Tier 2 under internal ratings-based approach	-		
<b>Capital instruments subject to phase-out arrangements (only applicable between March 31, 2017 and March 31, 2022)</b>				
80.	Current cap on CET1 instruments subject to phase out arrangements	-		
81.	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-		
82.	Current cap on AT1 instruments subject to phase out arrangements	-		
83.	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-		
84.	Current cap on T2 instruments subject to phase out arrangements	-		
85.	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-		



## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

Table DF-12: Composition of Capital- Reconciliation Requirement

*INR Million*

		Balance sheet as in financial statements	Balance sheet under regulatory scope of consolidation
		As on 30-Sep-2020	As on 30-Sep-2020
<b>A</b>	<b>Capital &amp; Liabilities</b>		
i	Paid-up Capital	31,883	31,883
	Reserves & Surplus	98,571	98,571
	Minority Interest	-	-
	Total Capital	130,454	130,454
Ii	Deposits	329,325	329,325
	of which: Deposits from banks	6,369	6,369
	of which: Customer deposits	322,956	322,956
	of which: Other deposits (pl. specify)	-	-
iii	Borrowings	72,066	72,066
	of which: From RBI	-	-
	of which: From banks	1,482	1,482
	of which: From other institutions & agencies	70,585	70,585
	of which: Others (pl. specify)	-	-
	of which: Capital instruments	-	-
iv	Other liabilities & provisions	126,533	126,533
	<b>Total</b>	<b>658,378</b>	<b>658,378</b>
<b>B</b>	<b>Assets</b>		
i	Cash and balances with Reserve Bank of India	9,787	9,787
	Balance with banks and money at call and short notice	52,507	52,507
ii	Investments:	325,622	325,622
	of which: Government securities	325,427	325,427
	of which: Shares	-	-
	of which: Debentures & Bonds	195	195
	of which: Subsidiaries / Joint Ventures / Associates	-	-
	of which: Others (Commercial Papers, Certificate of Deposits etc.)	-	-
iii	Loans and advances	178,028	178,028
	of which: Loans and advances to banks	9,219	9,219
	of which: Loans and advances to customers	168,810	168,810
iv	Fixed assets	931	931
v	Other assets	91,503	91,503
	of which: Goodwill and intangible assets	70	70
	of which: Deferred tax assets	1,830	1,830
vi	Goodwill on consolidation	-	-
vii	Debit balance in Profit & Loss account	-	-
	<b>Total Assets</b>	<b>658,378</b>	<b>658,378</b>

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

INR Million

		Balance sheet as in	Balance sheet under	Referenc
		financial statements	regulatory scope of consolidation	
		As on 30-Sep-20	As on 30-Sep-20	
<b>A</b>	<b>Capital &amp; Liabilities</b>			
	<b>Paid-up Capital</b>	31,883	31,883	<b>A1</b>
	of which: Amount eligible for CET1	31,883	31,883	
	of which: Amount eligible for AT1	-	-	
	<b>Reserves &amp; Surplus</b>	98,571	98,571	
	Statutory Reserves	23,480	23,480	A2
	Capital Reserves	56,333	56,333	A3
	Investment Reserve Account	30	30	B1
	Investment Fluctuation Reserve	3,424	3,424	B2
	Balance in Profit & Loss A/c	15,304	15,304	
	of which :			
	Unallocated Surplus	7,193	7,193	
	Current period profits not reckoned for Capital Adequacy	8,111	8,111	
	Minority Interest	-	-	
<b>i</b>	<b>Total Capital</b>	130,454	130,454	
<b>ii</b>	<b>Deposits</b>	329,325	329,325	
	of which: Deposits from banks	6,369	6,369	
	of which: Customer deposits	322,956	322,956	
	of which: Other deposits (pl. specify)	-	-	
<b>iii</b>	<b>Borrowings</b>	72,066	72,066	
	of which: From RBI	-	-	
	of which: From banks	1,482	1,482	
	of which: From other institutions & agencies	70,585	70,585	
	of which: Others (pl. specify)	-	-	
	of which: Capital instruments	-	-	
<b>iv</b>	<b>Other liabilities &amp; provisions</b>	126,533	126,533	
	of which: Provision for Standard Assets	2,742	2,742	B3
	of which: Provision for Country risk	-	-	B4
	of which: General Provision	-	-	B5
	of which: Provision for Enhancing Credit Supply	495	495	
	of which: DTLs related to goodwill	-	-	
	of which: DTLs related to intangible assets	-	-	
	<b>Total Capital and Liabilities</b>	<b>658,378</b>	<b>658,378</b>	
<b>B</b>	<b>Assets</b>			
<b>i</b>	<b>Cash and balances with Reserve Bank of India</b>	9,787	9,787	
	Balance with banks and money at call and short notice	52,507	52,507	
	<b>Investments</b>	325,622	325,622	
	of which: Government securities	325,427	325,427	
	of which: Other approved securities	-	-	
	of which: Shares	-	-	
	of which: Debentures & Bonds	-	-	
	of which: Subsidiaries / Joint Ventures / Associates	-	-	
	of which: Others (Commercial Papers, Certificate of Deposits etc.)	195	195	
	<b>Loans and advances</b>	178,028	178,028	
	of which: Loans and advances to banks	9,219	9,219	
	of which: Loans and advances to customers	168,210	168,210	
	<b>Fixed assets</b>	931	931	
	<b>Other assets</b>	91,503	91,503	
	of which:			
	Goodwill	-	-	

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

	Other intangibles (excluding MSRs)	70	70	C1
	Deferred tax assets	1,830	1,830	
	Goodwill on consolidation	-	-	
	Debit balance in Profit & Loss account	-	-	
	<b>Total Assets</b>	<b>658,378</b>	<b>658,378</b>	

### Table DF-13: Main Features of Regulatory Capital Instruments

The Bank has not issued any Regulatory Capital instruments

Disclosure template for main features of regulatory capital instruments		
1	Issuer	
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	
3	Governing law(s) of the instrument	
	<i>Regulatory treatment</i>	
4	Transitional Basel III rules	
5	Post-transitional Basel III rules	
6	Eligible at solo/group/ group & solo	
7	Instrument type	
8	Amount recognised in regulatory capital (Rs. in million, as of most recent reporting date)	
9	Par value of instrument	
10	Accounting classification	
11	Original date of issuance	
12	Perpetual or dated	
13	Original maturity date	
14	Issuer call subject to prior supervisory approval	
15	Optional call date, contingent call dates and redemption amount	
16	Subsequent call dates, if applicable	
	<i>Coupons / dividends</i>	Not Applicable
17	Fixed or floating dividend/coupon	
18	Coupon rate and any related index	
19	Existence of a dividend stopper	
20	Fully discretionary, partially discretionary or mandatory	
21	Existence of step up or other incentive to redeem	
22	Noncumulative or cumulative	
23	Convertible or non-convertible	
24	If convertible, conversion trigger(s)	
25	If convertible, fully or partially	
26	If convertible, conversion rate	
27	If convertible, mandatory or optional conversion	
28	If convertible, specify instrument type convertible into	
29	If convertible, specify issuer of instrument it converts into	
30	Write-down feature	
31	If write-down, write-down trigger(s)	
32	If write-down, full or partial	
33	If write-down, permanent or temporary	

# Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

34	If temporary write-down, description of write-up mechanism	
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	
36	Non-compliant transitioned features	
37	If yes, specify non-compliant features	

### Table DF-14: Full Terms and Conditions of Regulatory Capital Instruments

Instruments	Full Terms and Conditions
The Bank has not issued any Regulatory Capital instruments	

### Table DF-15: Disclosure Requirements for Remuneration

The Bank's compensation policies including that of CEO's, is in conformity with the Financial Stability Board principles and standards. In accordance with the requirements of the RBI Circular No. DBOD No.BC.72/29.67/001/2011-12 dated January 13, 2012; the Regional Office of the Bank has submitted a declaration to RBI confirming the aforesaid matter and hence this disclosure is not applicable.

### Table DF-16: Equities – Disclosure for Banking Book Position - Nil

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

Table DF-17: Summary Comparison of Accounting Assets vs Leverage Ratio Exposure Measure

	<b>Item</b>	<b>INR Million</b>
1	Total consolidated assets as per published financial statements	575,102
2	Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	-
3	Adjustment for fiduciary assets recognised on the balance sheet pursuant to the operative accounting framework but excluded from the leverage ratio exposure measure	-
4	Adjustments for derivative financial instruments	205,748
5	Adjustment for securities financing transactions (i.e. repos and similar secured lending)	-
6	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off- balance sheet exposures)	64,280
7	Other adjustments (Asset amounts deducted in determining Basel III Tier 1 capital)	(70)
<b>8</b>	<b>Leverage ratio exposure</b>	<b>845,060</b>

## Bank of America, N.A. (India Branches)

## Basel III Pillar 3 Disclosures

Table DF-18: Leverage Ratio Common Disclosure Template

	Item	INR Million
1	<b>On-balance sheet exposures</b> On-balance sheet items (excluding derivatives and SFTs, but including collateral)	529,623
2	(Asset amounts deducted in determining Basel III Tier 1 capital)	(70)
3	<b>Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of lines 1 and 2)</b>	<b>529,553</b>
	<b>Derivative exposures</b>	
4	Replacement cost associated with all derivatives transactions (i.e. net of eligible cash variation margin)	51,550
5	Add-on amounts for PFE associated with all derivatives transactions	154,198
6	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the operative accounting framework	-
7	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-
8	(Exempted CCP leg of client-cleared trade exposures)	-
9	Adjusted effective notional amount of written credit derivatives	-
10	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-
11	<b>Total derivative exposures (sum of lines 4 to 10)</b>	<b>205,748</b>
	<b>Securities financing transaction exposures</b>	
12	Gross SFT assets (with no recognition of netting), after adjusting for sale accounting transactions	45,479
13	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-
14	CCR exposure for SFT assets	-
15	Agent transaction exposures	-
16	<b>Total securities financing transaction exposures (sum of lines 12 to 15)</b>	<b>45,479</b>
	<b>Other off-balance sheet exposures</b>	
17	Off-balance sheet exposure at gross notional amount	319,216
18	(Adjustments for conversion to credit equivalent amounts)	(254,936)
19	<b>Off-balance sheet items (sum of lines 17 and 18)</b>	<b>64,280</b>
	<b>Capital and total exposures</b>	
20	Tier 1 capital	111,626
21	<b>Total exposures (sum of lines 3, 11, 16 and 19)</b>	<b>845,060</b>
	<b>Leverage ratio</b>	
22	<b>22. Basel III leverage ratio (per cent)</b>	<b>13.21%</b>