



**Citibank, N.A. Bangkok Branch**

**Basel III Pillar 3**

**Capital and Liquidity Management Disclosure**

**31 December 2020**

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### Basel III – Pillar 3 Capital and Liquidity Management Disclosure

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## **1. Scope of Application**

The Capital Requirements Directive, often referred to as Basel III, introduced the need for banks operating under this new legislative framework to publish certain information relating to their risk management and capital adequacy. The disclosure of this information is known as Pillar 3 and is designed to complement the two other pillars of the Basel III, namely the minimum capital requirements (Pillar 1) and the supervisory review process (Pillar 2). The disclosure has been prepared in accordance with the BOT Notification No. SorNorSor. 14/2562 Re : Disclosure of Information on Capital Fund Maintenance for Commercial Banks which requires foreign banks to disclose information of the branch in Thailand only. Therefore, this disclosure reflects only information of the Bangkok Branch. Citi's capital and global risk management is presented in Citi Annual Report 2020 at [http://www.citigroup.com/citi/investor/corporate\\_governance.html](http://www.citigroup.com/citi/investor/corporate_governance.html).

In December 2008, Citibank, N.A. Bangkok Branch (hereafter referred to as “the Bank” or “Citibank”) adopted the Standardized Approach (SA) for credit and operational risks and the Hybrid Approach between Standardized and Internal Model Approaches for market risk.

## **2. Capital**

### **2.1 Capital Structure**

Capital has historically generated by cash injections from Citibank Head Office and net earnings retained in Thailand. As of December 31, 2020, Citibank recorded total capital of Baht 25,588 million. The detailed capital composition can be found in the “Capital Structure” table.

### **2.2 Capital Adequacy**

Generally, capital is used primarily to support assets in Citibank's businesses and to absorb credit, market and operational risks. The Bank's capital management framework is designed to ensure that Citibank maintains sufficient capital consistent with the Bank's risk profile and all applicable regulatory standards and guidelines. Citibank, N.A., Bangkok Branch is a branch of Citigroup's main global banking entity. As such, it does not have its own Board of Directors as one exists at the parent level. The Country Coordinating Committee (CCC) thus assumes much of the responsibilities of a Board of Directors at the local level. Senior Management oversight of the capital adequacy assessment process lies with the CCC which approves policies concerning capital adequacy and strategies by evaluating business plans and risk levels.

## **3. Risk Exposure and Assessment**

Credit Policy and Procedure Manuals are the doctrines by which the Bank's risk management functions. The objective of these policies is to implement risk management and control practices such that consistent criteria are used to appraise similar risks; leading to prudent management of the overall risk profile, and optimization of risk versus return. The policies and principles for risk and control assessment require that appropriate controls and tools are in place to manage, measure and actively mitigate risks taken by the Bank. The global policies and local programs and procedures contain limits and control framework which set guidelines to ensure that business concentrations are within the Bank's risk and loss tolerance levels.

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The Country Senior Management's objectives, budgets, portfolios, and investments must be prudent and reflect their view of risk and reward arising from market conditions and should dynamically adjust these strategies and budgets to fit changing environments. Business concentrations must be managed with the goal of a diversified portfolio and risks undertaken should not be disproportionate to the Bank's capital. Stress testing is a core responsibility which acts as one of the many preventive measures of extreme event risks. Significant stress losses will be escalated to the Country Senior Management.

Material Risk Managers must be vigilant in ensuring that they communicate and escalate risk awareness to other parts of the organization that may be impacted by developments in their respective risk domains. All business activity must report into the Compliance/Control, Risk, or Finance systems to ensure they are properly tracked and monitored. Material Risk Managers must periodically review communications with or actions by regulators, any material legal affairs of Citibank, and compliance with applicable laws on all Risk Management related matters. Internal Audit and Control units will test important risks as per their audit plans. Each business unit/function will perform self-assessments of their important risks on a quarterly basis. Any material issues raised by internal control, audit, or other reviews and steps taken to address any such issues should be highlighted to Senior Management.

Internal Audit (IA) has the responsibility to perform the internal, independent audit and control review function for the Bank, covering all businesses, functions, and geographies. Audit results are communicated to appropriate senior management personnel. IA examines and evaluates the adequacy and effectiveness of the Bank system of internal controls and risk management processes and the quality of performance in carrying out assigned responsibilities to achieve the Bank's stated goals and objectives. It also tracks the development and implementation of corrective actions to address significant control weaknesses identified.

## **4. Risk Categorization**

### **4.1 Credit Risk**

#### ***4.1.1 Credit Risk Management***

##### ***Credit Risk Management Processes***

The credit risk management process at Citibank relies on corporate-wide standards to ensure consistency and integrity, with business-specific policies and practices to ensure applicability and ownership, while keeping in mind at all times, the local regulatory framework under which we operate in.

Risk tolerance is governed by the Bank's credit and product policies as well as Local Operating Procedures (LOP). The policies document the core standards and methodology for identifying, measuring, approving, and reporting risk in the respective businesses and drive escalation of larger exposures and exceptions to higher approval levels. Credit authority levels, delegation processes, approval processes for portfolio classification, product and transaction approval, other types of required approvals, and the appointment of credit officers and their responsibilities are defined in these documents. LOP's were developed locally to incorporate applicable local regulations, market practices, and requirements and are used in conjunction with the credit policies.

For Retail, the Global Consumer Credit and Fraud Risk Policy Manual (GCCFRP) and Local Product Citi Business Credit Policy & Procedure Manual (BCPPM) define how credit risk is

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managed for the retail portfolios. The GCCFRP and BCPMM document policies that are applicable across the credit cycle (i.e. acquisition, portfolio management, fraud, authorization, collections and risk mitigation). All policies and programs are developed keeping in mind local and US regulations and are governed on the principles of prudence and long-term viability. Product programs need formal approval from country and regional risk management along with business, compliance and legal concurrence. Credit Officers and Senior Credit Officers are independent from the business.

### Structure and Responsibilities of Credit Risk Management Units

Credit risk is managed across designated functional units that focus on credit analysis, credit approval, early warning monitoring, remedial management, and portfolio monitoring. The respective credit policies provide guidance on the minimum requirements for each function, thereby ensuring consistent credit risk management standards across the Bank.

### Credit Risk Measurement, Monitoring, and Reporting Systems

Each unit follows established processes that quantify and measure credit risk in addition to reporting it independently from the respective business, both in report format and data that is aggregated in bank-wide credit risk systems. Indicators used to measure, monitor, and report risk include but are not limited to the below.

- Portfolio and obligor limits;
- Leading indicators (i.e. applications, approvals, approval rate, approval by score range, and overrides and exceptions to credit acceptance standards);
- Stress test results
- Portfolio profitability measures;
- Cost of credit and non-performing loans; and
- Past due and impairment indicators.

### Credit Risk Hedging or Mitigation

Hedging and mitigating credit risk is done through eligible collateral, personal and/or corporate guarantees, and derivatives. Hedges and risk mitigation are subject to the applicable credit policies.

### Credit Risk Control limits

Each individual credit exposure is subject to an obligor limit as applicable to the obligor profile which helps maintain a diversified credit portfolio of risk assets. In addition, concentration reporting provides cross section views into the portfolio by name or across names.

### Past due, Impairment and Provision

#### *Wholesale*

An integral part of the monitoring process is the early identification of credit deterioration which, in turn, allows for the proactive workout of the exposure and prompt execution of risk mitigation techniques. Classification is the process of categorizing facilities based on credit quality and/or the ability or willingness of the obligor to honor its commitments. Classification does not necessarily equate to a loss on a facility. It may merely signify that the facility is under pressure due to a variety of causes, and the facility requires special attention to ensure that Citibank does not experience a loss. Classification should thus be viewed as consisting of two levels:

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Problem Levels: Classification categories Pass Watch List, Special Mention and Substandard (accrual) generally denote that a facility has a potential or well-defined weakness that requires attention.

- Pass Watch List is considered if a facility exhibits potential weakness but that weakness is mitigated by current and projected financial and operating strength of the obligor.
- Special Mention is considered if there is a potential weakness that deserves management's close attention. If left uncorrected, these potential weaknesses may result in deterioration of the repayment prospect of the facility.
- Substandard facility has a well-defined weakness and could jeopardize repayment capacity.

Loss Levels: Classification categories Substandard (non-accrual), Doubtful and Loss indicate that the likelihood of actual loss is high. Substandard (non-accrual) and Doubtful identifies a potential loss, while Loss identifies an actual loss. In most cases, classification of Substandard (non-accrual) and Doubtful requires an additional reserve build and Loss, an actual write-off. Early identification and proactive management of facilities in the Special Mention and Substandard (accrual) classification can result in lower exposure in the event that the facility continues to deteriorate to Substandard Non-accrual, Doubtful, or Loss.

The equivalent BOT classifications are as follows, although exceptions can be approved on a case by case basis:-

<b>BOT</b>	<b>Citi</b>
Performing Loan (Stage 1)	Pass, Pass Watch List
Under-performing (Stage 2)	Special Mention, Substandard (Accrual)
Non-performing (Stage 3)	Substandard (Non-accrual), Doubtful, Loss

### *Retail*

GCB has a similar process for monitoring impairment as related to loan delinquency The Bank applied Loan Loss Reserve based on TFRS 9 Simplified approach.

Following table and detail notes below show the staging guideline and reserve methodology per stage.

Stage	Retail Consumers ( <i>Cards / Ready Credit / Rewrite</i> )
3	➤ Reserve for 100% Ending Net Receivables ("ENR") (net of recoveries)
2	➤ Reserve for 100% ENR (net of recoveries)
1	➤ $(12 - (\text{WO months} - 1)) / 12 * 12\text{-Month forwards loss rate}$

Stage Identification (for Consumer Retail – Bankcards / Ready Credit)

- Stage 3: 90+ Days Past Due (DPD) accounts; loans with partial charge-offs; probate or bankruptcy notification
- Stage 2: Accounts that are not Stage 3 and are 30-89 DPD; Hardship modifications (<6 months on book); Behavior score drops below marginal booking segment.
- Stage 1: All accounts that are not Stage 2 or 3

For Mortgage, Margin and Securities Based Finance (MSBF) and "Other Secured" portfolios, in case the ENR net of recoveries and collateral is likely to result in a NIL reserve, the reserve will be computed at the higher of 100% of collateral shortfall or Basel EL. Unsecured small / Liquidated portfolio also apply the Basel EL.

For the Impaired Loans from Acquired portfolio (Steel portfolio) use 100% of ENR

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The 12 month forward looking loss rate represents the business/country best forecast for the next 12 months including consideration of forward looking macro-economic assumptions.

The Bank also factors in future risks from the external environment to enhance reserves if required. The GCB loss provisioning procedures and monthly assessment are reviewed and approved by the Country Senior Management (Credit Ops Head, Country Risk Manager and CFO) with the aim of ensuring adequate reserves at all times.

Starting from January 1, 2020, IFRS/TFRS 9 methodology will be adopted as per the Bank of Thailand notification Sor.Nor.Sor 23/2561. On initial adoption of TFRS9, as at 1 January, the Branch had an excess provision of loan amount, the excess provision would be recognised in profit or loss on a straight-line basis over 5 years. The excess provision would be treated as general provision. This practice follows the Bank of Thailand's guideline per BOT/For.Nor.Sor.(23)Wor.1603/2562.

### 4.1.2 Credit risk exposures

#### Credit Ratings and Credit Quality Grade

In compliance with BOT guidelines, ratings by Moody's Investors Service and Standard & Poor's, where available, are used to rate obligors. For the purposes of risk-weighting, S&P and Moody's ratings are assigned to an equivalent BOT rating with a corresponding risk weight.

Long-term Credit Quality Grades	S&P	Moody's
1	AAA AA+ AA AA-	Aaa Aa1 Aa2 Aa3
2	A+ A A-	A1 A2 A3
3	BBB+ BBB BBB-	Baa1 Baa2 Baa3
4	BB+ BB BB-	Ba1 Ba2 Ba3
5	B+ B B-	B1 B2 B3
6	CCC+ CCC CCC- CC C D	Caa1 Caa2 Caa3 Ca C

Short-term Credit Quality Grades	S&P	Moody's
1	A-1+ A-1	P-1
2	A-2	P-2
3	A-3	P-3
4	Others <sup>1</sup>	Others

<sup>1</sup> Others: includes Non-prime ratings and B and C credit ratings



### 4.1.3 *Credit risk mitigation*

#### *Wholesale*

##### *On/Off-Balance Sheet Netting*

Cross-product netting and cross-product margining can be achieved through a qualifying master netting agreement that provides for termination, cross-default, and close-out netting across multiple types of financial transactions documented under multiple agreements. Close-out netting occurs when termination values of all transactions documented under a single agreement are calculated and netted to determine a single lump sum close-out amount that is either due to, or by, a counterparty. Determination on whether a margin can function as a legally recognizable risk mitigant against exposure and thereby decrease Citibank's exposure is made on a counterparty by counterparty, agreement by agreement basis, giving consideration to such factors as the place of organization of the counterparty, the insolvency laws applicable, the location of the margin, and the relevant documentation. Margining must be covered by an ISDA, Credit Support Annex (where appropriate) or equivalent Master Agreements if required by local law and/or as required by Legal.

##### *Collateral Management and Valuation*

Collateral and other secured assets should have perfected first priority security interest. This includes physical collateral (evaluated by an approved outside appraiser) as well as cash and financial collateral. All qualifying collateral that is pledged to support direct and contingent risk exposures must be legally enforceable and documented with insurance coverage as applicable. An approved technology system for collateral data collection and aggregation is used to track current collateral values for regulatory capital treatment. Collateral is reviewed annually or more often as deemed appropriate.

The Bank accepts physical collateral such as equipment, inventory, and real estate in addition to cash and financial collateral. Acceptable guarantees are personal, third-party, and corporate guarantees.

Risk from collateral is mitigated by accepting only approved assets. Guarantees are primarily from qualified parties that are related to obligors or acceptable third parties in the form of SBLCs. Citibank does not maintain open positions in credit derivatives markets.

##### *Credit Concentration Risk*

Credit concentration risk is mitigated through established limits on specific portfolio characteristics, such as obligor risk ratings, industry classifications, Risk Acceptance Criteria (RAC) deviations, and banking product types. These limits are regularly reviewed by management and escalated at certain thresholds. While the Institutional Clients Group (ICG) portfolio can potentially have some exposure concentrations, these are monitored as per BOT guidelines in terms of exposures exceeding 10% of the existing capital. The Citi Commercial Bank (CCB) portfolio has a high degree of granularity with small exposures that are individually limited by maximum customer facility limits as mandated by the credit policies.

#### *Retail*

The Bank carefully monitors its lending activities with clearly defined and well executed credit policies that weigh long-term viability of credit programs against short term gains. Credit Policies are executed through automated processes that minimize human error and improve turnaround time to customers with regular reviews conducted to ensure that credit performance is within accepted standards.

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Risk mitigation is implemented based on event-related contingencies (i.e. unemployment, reductions in income, sickness, death, etc).

There is an established set of measures, procedures, and policies for monitoring the performance of the retail asset portfolios as done through the monthly Portfolio Quality Review (PQR) which covers the following key areas.

- Leading indicators that include macroeconomic indicators, new booking characteristics, test programs, significant credit changes, and portfolios classified as “Performance Exception”, and portfolio performance indicators such as delinquencies, net flows, and credit losses. Where applicable, the results are compared against historical performance, plans, and/or benchmarks;
- Monitoring of limits stipulated in approved programs;
- Concentration limits and/or caps for high-risk segments;
- Test Programs tracking;
- Deviation rates and related performance of approved exceptions;
- Reporting Key Risk Indicators (KRI) if benchmarks are triggered and actions taken, where applicable. KRI’s include tripwires identified during stress testing;
- Inventory of credit changes made. For significant credit changes, performance against benchmarks is tracked for 12 months; and
- Days past due (DPD) that are used to assess the level of individual impairment provision required.

As part of credit risk mitigation in the retail portfolio, forecasts of portfolio performance over the next 12 months are done as part of the annual budget process. This process includes review of volume growth, expected losses and reserves and related profitability. The process is subject to the independent review by and concurrence of the Regional and Global Risk Management Office. Once approved, they are used as credit benchmarks to monitor portfolio performance in the next financial year.

Large consumer portfolios are also subject to annual business stress testing that puts the major asset product portfolios through a set of generated stress scenarios to determine their loss absorption capacity. This is conducted by the Country Risk Management Office in conjunction with Regional Risk and is ultimately approved by the independent Global Country and Public Sector Risk Management Office (CPR).

### **4.2 Market Risk for Trading Book**

Market risk is the potential loss resulting from a change in the current economic value of a position due to changes in the associated underlying market risk factors. Market risk can arise in earnings risk from changes in interest rates, foreign exchange rates, and equity and commodity prices as well as in their implied volatilities.

The Bank is fully integrated into the overall Citi risk and control framework, balancing senior management oversight with well-defined independent risk management functions. It is the responsibility of the senior management of Citibank to implement Citi’s risk policies and practices, and to respond to the needs and issues in the bank. The Bank’s market risk management process is part of the Citibank N.A. risk management process.

In terms of internal controls, Market Risk Management (MRM), an independent group oversees market and liquidity risk and ensures the approved risk profile is consistent with Citibank’s overall risk appetite. Market risk limits are approved by Regional Market Risk Manager based on

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discussion with business management in view of their business plans and revenue budget for the year.

Limits are monitored on a daily basis and excesses are highlighted to senior management and ratification by the traders whether to hold, reduce or close the position would be discussed together with the concurrence of Market Risk Management and the management of the Risk Taking Unit (RTU).

### Trading Risk Measurement

The Bank has established limits to define risk tolerance and to keep trading risk exposure under control through several risk measurement parameters as follows:

Factor Sensitivities (FS): The FS are used to measure an instrument's sensitivity to a change in value e.g. DV01, IR Vega, FX Delta, FX Vega etc. MRM ensures that FS are calculated, monitored and an appropriate limit defined to manage the relevant risk in a trading portfolio.

Value-at-Risk (VaR): VaR estimates the potential decline in the value of a position or a portfolio, under normal market conditions, at a 99% confidence level over a 1 day holding, consistent with Basel III framework.

### Stress Testing

Stress testing serves as a way in making management aware of the risks and P&L impact of extreme, abnormal movements of market variables and served as early warning triggers. In line with Basel III requirements, stress testing procedures are developed in response to business or market specific concerns and the scenarios are usually idiosyncratic in nature designed to probe the risk of each specific portfolio. Stress tests are applied to all Trading/Accrual portfolios within a specific business, as appropriate.

### Back Testing

Back-testing is required by BOT on a periodic basis, in order to assess the adequacy of allocated market risk capital (derived from VaR) as a cushion to absorb losses. It is the comparison of ex-ante VaR to ex-post Profit and Loss (P&L) and excludes fees, commissions and intra-day trading from the P&L.

### Capital Charge

For market risk capital charge, Citibank got approval from BOT to use a hybrid model which is a mixture of both Internal Model Approach (IMA) and Standardized Approach (SA).

The IMA is used to calculate capital charge for risk taking activities across all trading positions for all asset classes e.g. Interest Rate Risks, Foreign Exchange Risks etc. based on the VaR.

The SA is used only to calculate the capital charge arising from the funding of trading positions. The capital charge is calculated based on long or short position over a tenor bucket.

## 4.3 Interest Rate Risk in the Banking Book

Citibank is exposed to various risks associated with the effects of the fluctuations in the prevailing market interest rates on its financial positions and cash flows. Interest rate risk arises in both trading portfolios and non-trading portfolios. Interest rate risk primarily results from the timing differences in the re-pricing of interest-bearing assets and liabilities. It is also related to positions

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from non-interest bearing liabilities including shareholders' funds and current accounts, as well as from certain fixed rate loans and liabilities.

Interest rate risk is managed by the Treasury Department within limits approved by the Regional Market Risk Manager, including interest rate gap limits. The Country Assets and Liability Committee (ALCO) and Market Risk Manager ensure that it is consistently and fully applied within Citibank.

Asset and liabilities which are contractual in nature are monitored up to the re-pricing tenors. Non-interest bearing and perpetual products, e.g. current/saving accounts, credit cards, ready credit, are monitored for interest rate risk on core and non-core balances.

### Interest Rate Risk Measurement

The Bank has established the following interest rate risk measurement and control limits for the Banking Book:

**Interest Rate Exposure (IRE):** IRE measures the potential pre-tax earnings impact, over a specified reporting period, for the accrual positions, from a defined change in the yield curve. It is a forward-looking measure.

**Other comprehensive Income (OCI) Risk:** OCI Risk measures the potential impact to the OCI accounts of a specified change in interest rates for the Available-for-Sale (AFS) portfolios. It is measured on a currency-by-currency basis for all portfolios that have significant AFS.

### Stress Testing

Stress testing serves as a way in making management aware of the risks and P&L impact of extreme, abnormal movements of market variables and served as early warning triggers.

## 4.4 Equity Risk

Citibank did not engage in equity transaction during 2020.

## 4.5 Operational Risk

### OPERATIONAL RISK MANAGEMENT PROCESS

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. This definition of operational risk includes legal risk but excludes strategic and reputation risks. The bank also recognizes the impact of operational risk on the reputation risk associated with business practices.

### Mitigating Operational Risk

The bank has **three lines of defense** to manage its operational risk. This is composed of the following: 1) units that own risks (first line of defense), 2) those that independently assess risk (second line of defense) and 3) units that provide independent assurance on effectiveness of the governance and management of risks (third line of defense). Additionally, the bank has units identified to maintain strong control environment (control and support functions). The lines of defense and control and support functions coordinate to identify, measure, monitor and control risk arising from activities.

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The bank has several tools to monitor and manage operational risks. A few of the tools are mentioned below:

**Manager's Control Assessment (MCA) Governance Risk and Control (GRC)**– Risk is identified, assessed, and managed at different levels within the bank. The objective of the GRC is to standardize at the most appropriate level, how risks are assessed. This enhances data aggregation, reporting and analysis.

The MCA establishes a comprehensive self-assessment program, methodology and tools to support managers in mitigating their GRC Risks through consistent:

- Risk and control identification
- Risk and control assessment and monitoring
- Residual risk management

**Internal Operational Risk Events Capture** –is a system to capture losses, gains and recoveries for actual operational risk events, including credit boundary, near-miss and timing difference events

**Lessons Learned and Event Reviews** –business is required to assess significant internal or external adverse events if there is potential for similar event to occur or to prevent the internal event from occurring again.

**Integrated Corrective Action Plans (iCAPS)** – is the system used for management of issues and corrective action plans that are identified from various assessment processes. These include vendor reviews, internal audit, regulatory review, management observation, compliance testing and manager's control assessment.

The governance and oversight of significant compliance and operational risk is handled by the **Business Risk and Control Committee (BRCC)**. The BRCC is mandated to ensure that all material compliance and operational risks are adequately identified, monitored, reported, managed, and escalated. The committee ensures that actions are taken to address material risks in line with strategic objectives, policies, risk appetite thresholds and regulatory expectations. It is tasked to promote culture of risk awareness and high standards of conduct.

The bank uses a standard Taxonomy to identify, assess and report risks. These are:

1. Fraud Risk (excl. Technology)
2. Money Laundering Risk
3. Sanctions Risk
4. Bribery Risk
5. Customer/Client Protection Risk
6. Market Practices Risk
7. Governance & Prudential Risk
8. Risk Oversight Errors
9. Reporting Risk
10. Model Risk
11. Physical Damage Risk
12. Human Capital Risk
13. Processing Risk
14. Third Party Risk
15. Data Management Risk
16. Technology Risk (incl. Cyber)

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Specific examples of programs for Continuity of Business (COB) and Cyber that are in place to mitigate Operational Risk include the following.

Citibank Thailand's COB standards support the safety of Citi's personnel and the soundness of its businesses through consistent enterprise-wide CoB risk management practices, including but not limited to risk assessment, recovery planning, testing, and crisis management. It's Citi's objective to ensure Business and Technology senior management engagement in and oversee the CoB practices. Citi is aware that failure to plan for and mitigate the effects of business disruptions could result in financial loss, legal or regulatory repercussions, reputational damage, or even physical harm to staff. This is why Citi's CoB Standards globally are aligned to the Federal Financial Institutions Examination Council (FFIEC) IT Examination Handbook on Business Continuity Planning, the Interagency Paper on Sound Practices to Strengthen the Resilience of the U.S. Financial System, as well as the International Standards Organization's ISO 22301 and ISO 22313 Standards on Societal Security – Business Continuity Management Systems. In addition, Citi's CoB Testing Standards define the testing required for business, application, and technology recovery strategies (including End User Computing and Third Parties) for the following business disruption scenarios:

- Unavailability of or “Denial of Access” to Primary Premises (includes Unavailability of Staff)
- Unavailability or “Denial of Service” of Technology due to a Data Center or Technology Room Outage
- Unavailability of services provided by External Third-Parties

Citi applies a risk-based approach in defining CoB testing requirements by distinguishing between Business Functions and supporting applications that have been classified as “Franchise Critical” versus all others classified with a subordinate business criticality level. It is also the objective of these standards to establish oversight, at the Citi-level, of the Business processes, to ensure appropriate consistency in practices. In summary, Citi's CoB program is designed to safeguard Citi's staff, business operations, and technology under a diverse set of conditions, including the resolution to ensure effective risk management and the resiliency of Citibank Thailand's continuity of business.

In addition, as the reliance on digital banking technology grows, Citi continues to enhance its Cyber Risk mitigation with an intelligence-led and information-sharing approach to Information Security. Citi brings together experts from its Global Information Security (GIS), Citi Security & Investigative Services (CSIS), and Security Operations Center (SOC) to ensure effective collaboration, information sharing, and strategic intelligence analysis that can support, enhance, and contribute to Citi's information security risk decision-making.

Citi's information security strategy is spearheaded by The Cyber Security Fusion Center (CSFC) located in three cities globally (New York, U.S.A., Budapest, Hungary and Singapore) that connects its collective intelligence around the clock with automation, analytics, and most important, human judgment, to support Citi's three strategic objectives:

- Prevent cyber-attacks against Citi and our critical partners by deterring, detecting, predicting, planning for, and preempting threats
- Reduce Citi's vulnerability and risk to cyber-attacks by sharing new knowledge and providing relentless follow-up on priority issues
- Minimize damage and recovery time from cyber-attacks that do occur by serving as a coordinating entity

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The CSFC provides real time cyber security support (including timely and actionable intelligence) to each country through daily coordinated regional cyber calls (to share the latest cyber incidents and preventative actions) and provides a forum for local country incident escalation and immediate action to mitigate cyber risk.

### Operational Risk Assessment

The Bank implemented Governance, Risk & Compliance (GRC) Standard and Procedure in Q2, 2019 that aim to achieve greater convergence across the company through common frameworks, assessment methodologies, processes and platforms for managing operational, compliance, conduct, legal and reputational risk and better alignment and transparency between the 1st, 2nd & 3rd Line of Defense. The Management's Control Assessment (MCA) Standard and Procedure establish a comprehensive self-assessment program, methodology and tools to support managers in mitigating their GRC Risks through consistent :

- Risk and control identification
- Risk and control assessment and monitoring
- Residual risk management

Individual residual risks and aggregated residual risk ratings are automatically derived between Tier 1 to 5, where Tier 1 is the highest risk and Tier 5 is the lowest risk. The MCA Governance Entity Owner (MGE owner) must review the main risk drivers of the MGE Residual Risk Rating and where necessary take steps to manage residual risk down. MGE rating for Thailand has been Tier 4 residual risk (low risk) since implementation in Q2, 2019. Control issues have little to no impact on the ability to meet business objectives and are mainly self-identified by management. Corrective action plans are generally short-term and compensating controls are consistently in place. Management has sufficient resources to fully correct all open issues timely.

For all products subject to review pursuant to the Citi New or Complex Products, Services and Business Line Policy or any other such new product approval policy or standard, relevant operational risks should be identified and documented where approval is required to ensure that these risks, both initially and ongoing, are properly considered and controlled.

The Bank currently uses the Standardized Approach (SA-OR) for calculating operational risk capital based on revenue, which is categorized into eight business lines according to the Bank of Thailand.

Bank of Thailand (BOT)'s requirement- Notification No. Sor.Nor.Sor. 95/2551: The calculation of value equivalent to operational risk-weighted asset by using SA-OR can be summarized in the formula below:

$$ERWA_{SA-OR} = 12.5 \times K_{SA-OR}$$

$$K_{SA-OR} = \frac{\sum_{Year1-3} \max [\sum (GI_{1-8} \times \beta_{1-8}), 0]}{3}$$

Where

$ERWA_{SA-OR}$  = Value equivalent to operation risk-weighted asset under SA-OR

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$K_{SA-OR}$	= Minimum capital base for operational risk under SA-OR
$GI_{1-8}$	= Annual gross income for each of eight business lines
$\beta_{1-8}$	= Constant risk value under SA-OR which is assigned a different value for each type of eight business lines

To derive operational risk, the Bank has methodology as follows;

1. Allocating gross income for each business line by local General Ledgers (GL) with Local Product ID (PROD MIS). One GL with PROD MIS can go to only one type of income.
2. Apply beta in below table to each GI which is standardized approach from BOT to derive operational risk for year.

Gross Income type	Beta
Corporate Finance	18%
Trading and Sales	18%
Retail Banking	12%
Commercial Banking	15%
Payment and Settlement	18%
Agency Services	15%
Asset Management	12%
Retail Brokerage	12%

3. Calculate average amount of current year and 2 years prior.
4. Compute operational risk weight by multiplying 12.5.

To achieve a qualitative risk appetite, the Bank is committed to effective operational risk management and has a consistent, transparent replicable methodology and framework. Our Framework ensures operational risks are adequately identified, measured, monitored, managed, and reported by all business segments. Citi implemented the Operational Risk Management Policy and related Standards to assist in consistent and effective execution globally.

The Bank's Framework is aimed at achieving:

- Effective management of operational risks by determining that a well-controlled operating environment is in place; and
- Accurate operational risk measurement and quantification of the Bank's operational risk capital.



### 4.6 Liquidity Risk

Liquidity Risk is the risk that the firm will not be able to efficiently meet both expected and unexpected current and future cash flow and collateral needs without adversely affecting either daily operations or the financial condition of the firm.

Thailand ALCO and Country Treasurer monitor the liquidity to maintain the flexibility required to meet regulatory and financial commitments. Management of liquidity is performed on a daily basis and is monitored by the Local Markets Treasury team which includes liquidity planning and the use of ratios, limits, triggers, and stress testing with the addition of management of the transfer pricing. To mitigate the risk associated with intraday volatility, the escalation triggers for intraday liquidity monitoring have been established. Any failure to meet the minimum funding requirement will be escalated to seniors/ALCO together with the corrective action. In addition, five days cash flow forecast has been provided on a daily basis to estimate short-term cash inflows/outflows. A series of standard firm wide liquidity ratios has been established to monitor the structural elements of the Bank's liquidity.

### 4.7 Strategic Risk

Strategic risk is the immediate and potential impact on earnings or capital arising from adverse business decisions, improper implementation of decisions, or lack of responsiveness to external and internal changes. This risk is a function of the compatibility of the Bank's strategic goals, the business strategies developed to achieve those goals, the resources deployed against these goals, and the quality of implementation.

Strong governance processes and controls around the approval of new products, activities, complex transactions, structures and core processes help mitigate such risks.

### 4.8 Reputation Risk

Reputation risk is defined as the risk to current or potential earnings or capital arising from changes in the business environment, improper implementation of decisions, or adverse perception of the image of the firm on the part of customers, counterparties, shareholders, investors, or regulators. As a service-based company, this risk is material and closely related to franchise risk. Part of the assessment process of all products and lines of business is a specific assessment of reputation risk impacting the franchise's reputational position. Among other things, the suitability and appropriateness of products offered and the intrinsic sophistication of clients in understanding the risk factors behind the same are considered. There are specified rules of conduct in both the wholesale and retail segments that ensure that the reputational and regulatory risks of the franchise are kept in mind at all times.

Mitigations for reputation risk exist across the franchise at numerous levels and functions. The Bank has a comprehensive grievance addressing mechanism where there is an escalation process to ensure that all complaints are handled with an unbiased and objective approach.

Citi's corporate reputation is a valuable corporate asset and the way information is communicated to the media and the public has an impact on its reputation. Importance is given to ensuring fair and accurate reporting of the company's business to all external stakeholders and audiences. As an internal control for reputational risk management, Citi has a strict Public Disclosure and

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Communication Policy that details the guidelines for speaking to the media and the sharing of company and product information. Only authorized spokespersons can speak on behalf of or about Citi with the media, investors, securities analysts, or government officials. External communication is reviewed to ensure clarity and consistency as well as transparency. For cases where there is possible impact on Citi's reputation, senior management and Public Affairs work closely together to negate any potential impact. Internally, Public Affairs is the key guardian of Citi's reputation and there is an escalation policy in place that ensures Public Affairs is kept informed of any potential negative impact arising from internal business decisions, staff behavior, customer complaints, business partner relationships, or regulatory actions.

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### 5. Key Internal Governance Committees / Forums

Strong governance is driven through the involvement of senior management in various governance meetings. The key meetings are detailed below:

Committee	Role of Committee	Committee Members	Frequency
Country Coordinating Committee (CCC)	A high level strategic committee in which senior managers of all businesses and functions are brought together to raise and discuss issues, including legal, compliance, regulatory, risk, control, or public relations that could affect the franchise. It also provides a clearinghouse for the escalation process up to region and corporate management.	CCO, All Business Heads, CBM, Heads of global functions (Finance, Risk, Legal, Compliance, ORM, HR, O&T, CSIS, IA, Government Affairs, Public Affairs)	Monthly
Business Risk Compliance & Control Committee (BRCC)	The purpose of the BRCC Committee is to provide a Senior Management forum to discuss significant risk, control, compliance and legal issues and events that can have a significant regulatory, reputational or financial impact towards meeting business objectives. Note: Local Regulatory Reporting Governance was merged with BRCC starting 2019.	CCO, CBM, CFO, O&T Head, Risk, All Business Heads, Legal, ORM, Compliance, HR, Government Affairs, IA, CSIS	Quarterly
Asset & Liability Committee (ALCO)	Responsible for the overall Balance Sheet & liquidity management of the franchise, including transfer pricing mechanism across the businesses.	CCO, Country Treasurer, CFO, Risk Management Country Officer, Market Risk Manager, Corporate Treasury, and key Business heads	At least quarterly
Country Third Party Risk Steering Committee (CTPM- SC)	The Country Third Party Risk Steering Committee's primary purpose is to ensure effective implementation, execution and prescribed governance of Third Party Management Policy & Standards within the country and businesses and drive sustainable management practices that are commensurate with the level of risk and complexity of all third party relationships.	CCO, Country Third Party Risk Manager, Country O&T Head, CCCO, Country ERC Head, Country Finance Officer, , CHRO, Country Legal Counsel, Country ORM Head, Country CBORC	No Less than Quarterly

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Committee	Role of Committee	Committee Members	Frequency
<p>AML Governance &amp; Business Risk Committee (GBRC)</p>	<p>The purpose of the AML Thailand GBRC is to provide a governance structure for (i) the identification, assessment, monitoring, control and reporting of Bank Secrecy Act (“BSA”), anti-money laundering (“AML”), and economic sanctions (including, but not limited to, the Office of Foreign Assets Control sanctions) (“Sanctions”) risks and (ii) the implementation, evaluation and enhancement of policies and procedures relating to compliance with relevant BSA/AML/Sanctions and country-specific rules and regulations (the “AML and Sanctions Program”). The objective is to maintain oversight of and implement enhancements to a globally standardized governance model that represents an integrated, consistent, and proactive AML and Sanctions risk management framework for program execution, risk assessment and issue escalation with the goal of preventing money laundering, sanctions violation and terrorist financing.</p>	<p>CCO, CBM, AMLCO, ORM, Compliance, O&amp;T Head, Risk, Legal, Business Head (CCB, TTS, RB, CIB, Markets and Card) CBOC and Regional AML M&amp;I FIU</p>	<p>Bi-monthly</p>
<p>Risk Management Country Forum (RMCF)</p>	<p>A forum for all the in-country / respective country risk management heads to provide an update for their respective businesses, deal with franchise level risk matters related to their businesses, provide risk management partnership to the CCO to ensure timely escalation and resolution of franchise level risk issues and foster best practices and knowledge sharing among all the in-country risk managers. The Risk Management Country Officer (RMCO) serves as the single point of contact for all franchise level risk matters in the country.</p>	<p>CCO, CFO, ORM, RMCO, Consumer Risk Head, Financial Institutional Risk Management, Regional Credit Risk Manager, CCB Risk Manager, Market Risk Manager</p>	<p>Quarterly</p>

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Committee	Role of Committee	Committee Members	Frequency
Regulatory Change Management (RCM)	Review & discuss regulatory, legislative, tax & labor-associated law updates by the Compliance, Legal, Finance & HR respectively to ensure that at the country level there is broad awareness and oversight of the new and changed regulations as well as impacts associating with KRR or business including controls and methods of assessments.	Citi Country Compliance Country Legal Counsel, Compliance, Legal, AML, Compliance Testing, Country HR, Finance, Tax, ICG IBCO, GCB IBCO	Monthly
Legal Entity Management Committee (LEMC)	Bring senior managers of all businesses and functions together to raise and discuss issues important to each Legal Vehicle and support a consistent view of the Citi to regulators, minimize reputational risk, and monitor that legal entities within Thailand jurisdictions are operated as approved and in accordance with applicable laws and Citi Legal Entity Management Policy.	CFO, CCO, CBM, Country Treasurer, Country Counsel, Local Markets Treasury Head, Controller, Compliance, Tax, Product and Control Heads, H R, ORM	Semi-Annual
Accounts Review Forum (ARF)	To provide senior oversight, monitoring and guidance on the overall Balance Sheet Control framework and issues and help resolve account related issues.	O&T Head, CFO, ERC, Controller, ORM, Risk, BSS	Monthly
Consumer Credit Forum	To review credit trends across products, breaches with respect to tripwires, risk policy changes and collections strategies.	CBM, CRM, O&T Head, Collections Head, Sales & Distribution Head, Product Business Heads, Risk Policy Heads	Quarterly

**Table 1 : Key Prudential Metrics**

Unit : Million Baht

Description	Dec-20	Jun-20
<b>1 Capital Fund</b>		
1.1 Total Capital	25,588	25,532
1.2 Fully loaded ECL total capital	25,588	25,532
<b>2 Risk Weighted Assets</b>		
2.1 Total Risk Weighted Assets (RWA)	129,268	164,308
<b>3 Total capital to risk-weighted assets (%)</b>		
3.1 Total capital ratio	15.49%	15.54%
3.2 Fully loaded ECL total capital ratio	15.49%	15.54%
<b>4 Capital Buffers Ratio (%)</b>		
4.1 Conservation Buffer	2.50%	2.50%
4.2 Countercyclical Buffer	0.00%	0.00%
4.3 Capital Buffer (Sum of 3.1 and 3.2)	2.50%	2.50%
4.4 Total capital ratio after minimum capital requirement	12.99%	13.04%
<b>5 Liquidity Coverage Ratio (LCR)%</b>		
5.1 Total high-quality liquid assets (HQLA)	58,251	65,171
5.2 Total net cash outflows within the 30-day time horizon	14,329	14,263
5.3 LCR (%)	406.54%	456.41%

**Citibank, N.A. Bangkok Branch**
**Table 2 : Capital of Foreign Banks Branches**

Unit : Million Baht

Item	Dec-20	Jun-20
<b>1. Assets required to be maintained under Section 32</b>	<b>25,800</b>	<b>25,800</b>
<b>2. Sum of net capital for maintenance of assets under Section 32 and net balance of inter-office accounts (2.1+2.2)</b>		
	<b>43,175</b>	<b>31,928</b>
2.1 Capital for maintenance of assets under Section 32	25,800	25,800
2.2 Net balance of inter-office accounts which the branch is the debtor (the creditor) to the head office and other branches located in other countries, the parent company and subsidiaries of the head office	17,375	6,128
<b>3. Total regulatory capital (3.1 - 3.2)</b>	<b>25,589</b>	<b>25,532</b>
3.1 Total regulatory capital before deductions (The lowest amount among item 1 item 2 and item 2.1)	25,800	25,800
3.2 Deductions	<b>211</b>	<b>268</b>

## Citibank, N.A. Bangkok Branch

Table 3 Minimum capital requirement for credit risk classified by type of assets under the SA

Unit : Million Baht

Minimum capital requirement for credit risk classified by type of assets under the SA*	Dec-20	Jun-20
<b>Performing claims</b>		
1. Claims on sovereigns and central banks, multilateral development banks (MDBs),	183	96
2. Claims on financial institutions, non-central government public sector entities (PSEs) treated as claims on financial institutions, and securities firms	4,335	4,125
3. Claims on corporates, non-central government public sector entities (PSEs) treated as claims on corporate	4,015	4,606
4. Claims on retail portfolios	5,224	4,744
5. Claims on housing loans	4	6
6. Other assets	403	219
<b>Non-performing claims</b>	56	61
<b>First-to-default credit derivatives and Securitisation</b>		
<b>Total minimum capital requirement for credit risk under the SA</b>	<b>14,220</b>	<b>13,857</b>

Minimum capital requirement for market risk for positions in the trading book by Internal Model Approach

Unit : Million Baht

Minimum capital requirement for market risk (positions in the trading book)*	Dec-20	Jun-20
Internal model approach	425	741
<b>Total minimum capital requirement for market risk</b>	<b>425</b>	<b>741</b>

Minimum capital requirement for operational risk (SA)

Unit : Million Baht

Minimum capital requirement for operational risk*	Dec-20	Jun-20
Calculate by Standardised Approach	3,528	3,475
<b>Total minimum capital requirement for operational risk</b>	<b>3,528</b>	<b>3,475</b>

Total risk-weighted capital ratio and Tier 1 risk-weighted capital ratio

Unit : %

Ratio	Dec-20		Jun-20	
	Capital Adequacy Ratio	Minimum Adequacy Ratio*	Capital Adequacy Ratio	Minimum Adequacy Ratio*
1. Total capital to risk-weighted assets	15.49	11.00	15.54	11.00
2. Tier 1 capital to risk-weighted assets **	0	0	0	0

\* Include conservation buffer 2.5% for 4-year accumulation since Jan 2016

\*\* Disclosure only Bank that locally registered



## Citibank, N.A. Bangkok Branch

**Table 4 Outstanding amounts of significant on-balance sheet assets and off-balance sheet items before adjusted by credit risk mitigation**

Unit : Million Baht

Item	Dec-20	Dec-19
<b>1. On-balance sheet assets (1.1 + 1.2 + 1.3 + 1.4)</b>	<b>262,211</b>	<b>232,761</b>
1.1 Net loans and accrued interest, net <sup>1/</sup>	90,571	142,861
1.2 Net investment in debt securities <sup>2/</sup>	53,023	61,502
1.3 Deposits (including accrued interest receivables) <sup>3/</sup>	81,204	3,420
1.4 Derivative Assets	37,413	24,977
<b>2. Off-balance sheet items <sup>4/</sup> (2.1 + 2.2 + 2.3)</b>	<b>2,456,534</b>	<b>3,083,187</b>
2.1 Aval of bills, guarantees, and letter of credits	6,495	5,796
2.2 OTC derivatives	2,154,119	2,795,258
2.3 Undrawn committed line	295,920	282,133

<sup>1/</sup> Including accrued interest receivables and net of deferred incomes, allowances for expected credit loss and including net loans and accrued interest of interbank and money market.

<sup>2/</sup> Excluding accrued interest receivables and net of allowances for revaluation of securities and allowances for expected credit loss.

<sup>3/</sup> Including accrued interest receivables and net allowance for expected credit loss

<sup>4/</sup> Before multiplying credit conversion factor

## Citibank, N.A. Bangkok Branch

**Table 5 Outstanding amounts of on-balance sheet assets and off-balance sheet items before adjusted credit risk mitigation classified by country or geographic area of debtor**

December 2020

Unit : Million Baht

Country or geographic area of debtor	On-balance sheet assets					Off-balance sheet items <sup>3/</sup>			
	Total	Net loans and Accrued Interest <sup>1/</sup>	Net investment in debt securities <sup>2/</sup>	Deposits (including accrued interest receivables)	Derivative Assets	Total	Aval of bills, guarantees, and letter of credits	OTC derivatives	Undrawn committed line
1. Thailand	199,648	88,890	53,009	30,070	27,679	1,989,779	5,847	1,688,433	295,499
2. Asia Pacific (exclude Thailand)	54,101	2,066	0	51,134	901	185,500	265	185,235	0
3. North America and Latin America	6,654	1	0	8	6,646	187,158	379	186,778	1
4. Africa and Middle East	21	21	0	0	0	0	0	0	0
5. Europe	2,193	5	0	0	2,188	94,095	3	93,672	420
<b>Total</b>	<b>262,617</b>	<b>90,983</b>	<b>53,009</b>	<b>81,212</b>	<b>37,413</b>	<b>2,456,533</b>	<b>6,494</b>	<b>2,154,119</b>	<b>295,920</b>

December 2019

Unit : Million Baht

Country or geographic area of debtor	On-balance sheet assets					Off-balance sheet items <sup>4/</sup>			
	Total	Net loans <sup>1/</sup>	Net investment in debt securities <sup>2/</sup>	Deposits (including accrued interest receivables) <sup>3/</sup>	Derivative Assets	Total	Aval of bills, guarantees, and letter of credits	OTC derivatives	Undrawn committed line
1. Thailand	191,176	106,455	61,502	3,411	19,807	2,608,345	5,304	2,321,328	281,713
2. Asia Pacific (exclude Thailand)	36,755	36,392	0	1	362	70,346	481	69,864	0
3. North America and Latin America	3,833	14	0	8	3,812	194,003	7	193,995	0
4. Africa and Middle East	0	0	0	0	0	0	0	0	0
5. Europe	996	0	0	0	996	210,494	3	210,071	420
<b>Total</b>	<b>232,761</b>	<b>142,861</b>	<b>61,502</b>	<b>3,420</b>	<b>24,977</b>	<b>3,083,187</b>	<b>5,796</b>	<b>2,795,258</b>	<b>282,133</b>

<sup>1/</sup> Including accrued interest receivables and net of deferred incomes, allowances for expected credit loss and including net loans and accrued interest of interbank and money market

<sup>2/</sup> Excluding accrued interest receivables and net of allowances for revaluation of securities and allowances for expected credit loss

<sup>3/</sup> Including accrued interest and net from allowance for expected credit loss

<sup>4/</sup> Before multiplying credit conversion factor

## Citibank, N.A. Bangkok Branch

**Table 6 Outstanding amounts of on-balance sheet assets and off balance sheet items before credit risk mitigation classified by residual maturity**

Unit : Million Baht

Item	Dec-20		
	Maturity not exceeding 1 year	Maturity exceeding 1 year	Total
<b>1. On-balance sheet assets (1.1 + 1.2 + 1.3 + 1.4)</b>	<b>229,087</b>	<b>33,509</b>	<b>262,596</b>
1.1 Net loans and accrued interest <sup>1/</sup>	46,175	6,820	52,995
1.2 Net investment in debt securities <sup>2/</sup>	80,801	404	81,205
1.3 Deposits (including accrued interest receivables) <sup>3/</sup>	88,592	2,391	90,983
1.4 Derivative Assets	13,519	23,894	37,413
<b>2. Off-balance sheet items <sup>3/</sup> (2.1 + 2.2 + 2.3)</b>	<b>1,392,486</b>	<b>1,064,047</b>	<b>2,456,533</b>
2.1 Aval of bills, guarantees, and letter of credits	2,299	4,196	6,495
2.2 OTC derivatives	1,098,806	1,055,312	2,154,118
2.3 Undrawn committed line	291,381	4,539	295,920

Unit : Million Baht

Item	Dec-19		
	Maturity not exceeding 1 year	Maturity exceeding 1 year	Total
<b>1. On-balance sheet assets (1.1 + 1.2 + 1.3)</b>	<b>185,892</b>	<b>46,869</b>	<b>232,761</b>
1.1 Net loans <sup>1/</sup>	138,153	4,708	142,861
1.2 Net investment in debt securities <sup>2/</sup>	36,546	24,956	61,502
1.3 Deposits (including accrued interest receivables) <sup>3/</sup>	3,087	333	3,420
1.4 Derivative Assets	8,106	16,871	24,977
<b>2. Off-balance sheet items <sup>4/</sup> (2.1 + 2.2 + 2.3)</b>	<b>1,867,807</b>	<b>1,215,381</b>	<b>3,083,187</b>
2.1 Aval of bills, guarantees, and letter of credits	1,769	4,026	5,796
2.2 OTC derivatives	1,586,443	1,208,815	2,795,258
2.3 Undrawn committed line	279,594	2,539	282,133

<sup>1/</sup> Including accrued interest receivables and net of deferred incomes, allowances for expected credit loss and including net loans and accrued interest of interbank and money market

<sup>2/</sup> Excluding accrued interest receivables and net of allowances for revaluation of securities and allowances for expected credit loss

<sup>3/</sup> Including accrued interest and net from allowance for expected credit loss

<sup>4/</sup> Before multiplying credit conversion factor

## Citibank, N.A. Bangkok Branch

**Table 7 Outstanding amounts of financial instruments\* before credit risk mitigation and provision (General Provision and Specific Provision)**

Unit : Million Baht

Item	Dec-20					
	Outstanding Amount		Provision <sup>1/</sup>	Provision under SA		Net Amount <sup>2/</sup>
	Defaulted Exposures	Non-defaulted exposures		General Provision	Specific Provision	
1. Net loans and accrued interest <sup>3/</sup>	5,664	90,344	5,437	412	5,025	90,571
2. Net investment in debt securities <sup>4/</sup>	0	53,023	0	0	0	53,023
3. Deposits (including accrued interest receivables) <sup>5/</sup>	0	81,204	0	0	0	81,204
4. Undrawn commitment and financial guarantees <sup>6/</sup>	452	302,741	21	21	77	303,172

<sup>1/</sup> means allowance for expected credit loss under TFRS9. For financial instrument measured at fair value through other comprehensive income, provision is not reported as per TFRS7 Disclosure of Financial Instrument. The outstanding balance under this instrument is to be reported with net amount after provision.

<sup>2/</sup> Net Amount = Outstanding Amount - Provision

<sup>3/</sup> Including accrued interest receivables and net of deferred incomes, allowances for expected credit loss and including net loans and accrued interest of interbank and money market

<sup>4/</sup> Excluding accrued interest receivables and net of allowances for revaluation of securities and allowances for expected credit loss

<sup>5/</sup> Including accrued interest and net from allowance for expected credit loss

<sup>6/</sup> Before multiplying credit conversion factor

## Citibank, N.A. Bangkok Branch

**Table 8 Outstanding amount of loans and including accrued interest receivables and investment in debt securities before adjusted by credit risk mitigation classified by countries and geographic area of debtors and classification defined by the Bank**

December 2020

Unit : Million Baht

Country or geographic area of debtor	Net loans and accrued interest <sup>1/</sup>					Net Investment in Debt Securities <sup>2/</sup>	
	Performing	Under-performing	Non-performing	POCI <sup>3/</sup>	Total	Performing	Total
1. Thailand	87,036	1,614	240	0	88,890	53,009	53,009
2. Asia Pacific (exclude Thailand)	2,066	0	0	0	2,066	0	0
3. North America and Latin America	1	0	0	0	1	0	0
4. Africa and Middle East	21	0	0	0	21	0	0
5. Europe	5	0	0	0	5	0	0
<b>Total</b>	<b>89,129</b>	<b>1,614</b>	<b>240</b>	<b>0</b>	<b>90,983</b>	<b>53,009</b>	<b>53,009</b>

<sup>1/</sup> Including accrued interest receivables and net of deferred incomes, allowances for expected credit loss and including net loans and accrued interest of interbank and money market

<sup>2/</sup> Excluding accrued interest receivables and net of allowances for revaluation of securities and allowances for expected credit loss

<sup>3/</sup> Purchased or originated financial asset(s) that are credit-impaired on initial recognition

## Citibank, N.A. Bangkok Branch

**Table 9 Provisions (General provision and Specific provision) and bad debt written-off during period for loan including accrued interest receivables and investment in debt securities classified by country or geographic area**

**Dec-20**

Unit : Million Baht

Country or geographic area of debtor	Loan including accrued interest receivables <sup>1/</sup>			Net Investment in Debt Securities <sup>2/</sup>	
	General provision	Specific provision	Bad debt written-off during period	General provision	Specific provision
1. Thailand		5,024	3,157		24
2. Asia Pacific (exclude Thailand)		1	0		0
3. North America and Latin America		0	0		0
4. Africa and Middle East		0	0		0
5. Europe		0	0		0
<b>Total</b>	412.00	5,025	3,157	-14	24

**Dec-19**

Unit : Million Baht

Country or geographic area of debtor	Loan including accrued interest receivables <sup>1/</sup>			Net Investment in Debt Securities <sup>2/</sup>	
	General provision	Specific provision	Bad debt written-off during period	General provision	Specific provision
1. Thailand		4,083	2,283		40
2. Asia Pacific (exclude Thailand)		372	0		0
3. North America and Latin America		0	0		0
4. Africa and Middle East		0	0		0
5. Europe		0	0		0
<b>Total</b>	-	4,455	2,283	0	40

1/ including specific provision and bad debt written-off during the period of loan and interest receivable for interbank and money market

## Citibank, N.A. Bangkok Branch

**Table 10 Outstanding amount of loans including accrued interest receivables before adjusted by credit risk mitigation classified by type of business and classification defined by the Bank of Thailand**

Dec-20

Type of business	Performing	Under-performing	Non-performing	POCI	Total
- Agriculture and mining	0	0	0	0	0
- Manufacturing and commerce	8	0	659	0	667
- Real estate business and construction	0	0	0	0	0
- Public utilities and services	2	1	0	0	3
- Housing loans	0	0	0	0	0
- Credit card	719	773	823	6	2,321
- Other Loans	483	1,547	0	0	2,030
- Interbank and money market items	1	0	0	0	1
- Leasing service	1	0	0	0	1
- Other Financial service	1	0	0	0	1
- Others	0	0	0	0	0
<b>Total</b>	<b>1,215</b>	<b>2,321</b>	<b>1,482</b>	<b>6</b>	<b>5,024</b>

\* Including outstanding amounts of loans and interest receivable receivables of interbank and money market

**Table 11 Provisions (General provision and Specific provision) and bad debt written-off during period for loan including accrued interest receivables\* classified by types of business**

Unit : Million Baht

Type of business	Dec-20			Dec-19		
	General provision <sup>1/</sup>	Specific provision	Bad debt written-off during period	General provision <sup>1/</sup>	Specific provision	Bad debt written-off during period
- Agriculture and mining		0			2	
- Manufacturing and commerce		667			1,077	
- Real estate business and construction		0			2	
- Public utilities and services		3			53	
- Housing loans		0			0	
- Credit Card		2,321	1,633		1,289	1,138
- Other Loans		2,031	1,524		1,454	1,144
- Interbank and money market items		1			471	
- Leasing Service		0			53	
- Other Financial Service		1			53	
- Others		0			1	
<b>Total</b>	<b>412</b>	<b>5,024</b>	<b>3,157</b>	<b>-</b>	<b>4,455</b>	<b>2,282</b>

\* including outstanding amount of loans including accrued interest receivables of interbank and money market

<sup>1/</sup> in aggregate amount

**Table 12 Reconciliation of change in provisions (General provision and Specific provision) for loans including accrued interest receivables\***

Unit : Million Baht

Items	Dec-20			Dec-19		
	General provision	Specific provision	Total	General provision	Specific provision	Total
Provisions at the beginning of the period		3,939	<b>3,939</b>		4,131	<b>4,131</b>
Bad debts written-off during the period		3,157	<b>3,157</b>		2,283	<b>2,283</b>
Increase or Decreases of provisions during the period		4,242	<b>4,242</b>		2,607	<b>2,607</b>
Other provisions (provisions for losses from foreign exchange, provisions for merger and sale of business)		0	<b>0</b>		0	<b>0</b>
Provisions at the end of the period	412	5,024	<b>5,436</b>	-	4,455	<b>4,455</b>

\* including outstanding amount of loans including accrued interest receivables of interbank and money market



**Table 13 Outstanding amounts of on-balance sheet assets and off-balance sheet items\* classified by type of assets under the SA**

Unit : Million Baht

Type of asset	Dec-20			Dec-19		
	On balance sheet assets	Off balance sheet item	Total	On balance sheet assets	Off balance sheet item	Total
<b>1. Performing claims</b>						
1.1 Claims on sovereigns and central banks, multilateral development banks (MDBs), and non-central government public sector entities (PSEs) treated as claims on sovereigns	84,938	2,103	87,041	64,604	1,653	66,257
1.2 Claims on financial institutions, non-central government public sector entities (PSEs) treated as claims on financial institutions, and securities firms	51,697	51,824	103,521	48,886	40,990	89,876
1.3 Claims on corporates, non-central government public sector entities (PSEs) treated as claims on corporate	65,907	3,387	69,294	29,549	6,606	36,155
1.4 claims on retail portfolios	63,314	0	63,314	67,592	0	67,592
1.5 Housing loans	93	0	93	133	0	133
1.6 Other assets	4,487	0	4,487	29,349	0	29,349
<b>2. Non-performing claims</b>	240	-60	180	5	0	5
<b>3. First-to-default credit derivatives and Securitisation</b>						
<b>Total</b>	<b>270,676</b>	<b>57,254</b>	<b>327,930</b>	<b>240,117</b>	<b>49,249</b>	<b>289,366</b>

\* After multiplying with credit conversion factor and net with Specific provision

**Table 14 Minimum capital requirement for each type of market risk under the Standardized Approach**

Unit : Million Baht

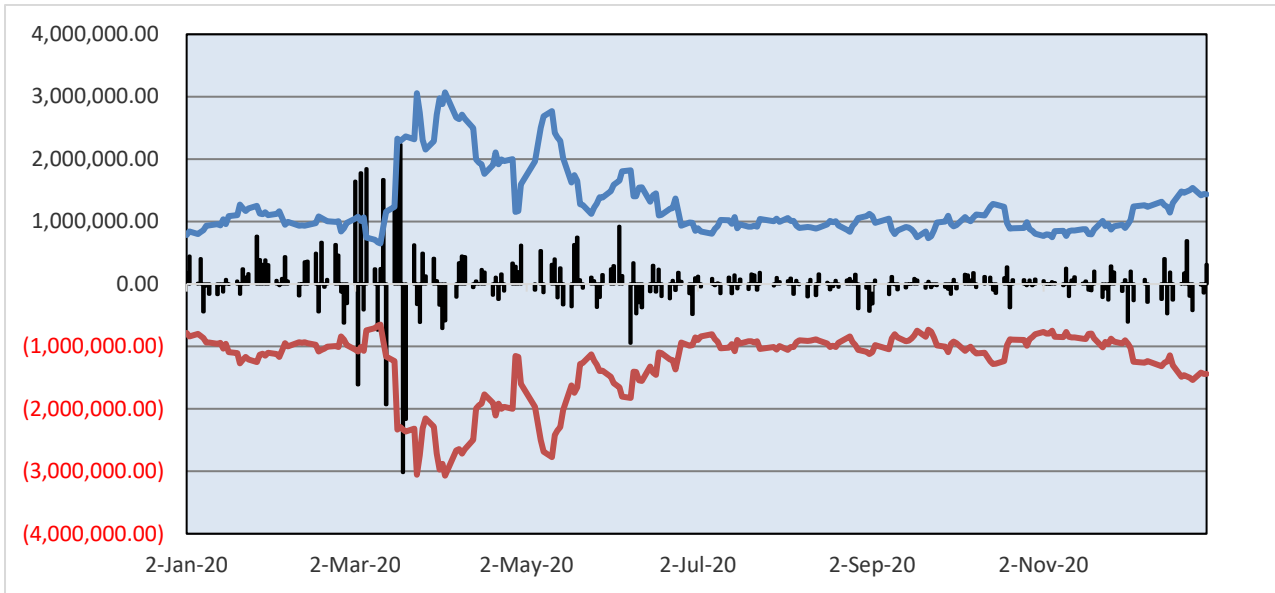
Minimum capital requirement for market risk under the standardised approach	Dec 2020	Jun 2020
Interest rate risk	0	0
Equity position risk	0	0
Foreign exchange rate risk	0	0
Commodity risk	0	0
<b>Total minimum capital requirement</b>	<b>0</b>	<b>0</b>

**Table 15 Market risk under Internal Model Approach**

Unit: Million Baht

Type of Market Risk	Dec-2020	Jun-2020
<b>Interest rate risk</b>		
Maximum VaR during the reporting period	45	95
Average VaR during the reporting period	30	46
Minimum VaR during the reporting period	22	20
VaR at the end of the period	43	30
<b>Equity position risk</b>		
Maximum VaR during the reporting period	-	-
Average VaR during the reporting period	-	-
Minimum VaR during the reporting period	-	-
VaR at the end of the period	-	-
<b>Foreign exchange rate risk</b>		
Maximum VaR during the reporting period	8	11
Average VaR during the reporting period	2	4
Minimum VaR during the reporting period	0	0
VaR at the end of the period	0	3
<b>Commodity risk</b>		
Maximum VaR during the reporting period	-	-
Average VaR during the reporting period	-	-
Minimum VaR during the reporting period	-	-
VaR at the end of the period	-	-
<b>Total market risk</b>		
Maximum VaR during the reporting period	46	95
Average VaR during the reporting period	30	47
Minimum VaR during the reporting period	22	20
VaR at the end of the period	43	30

**Table 16 Back-testing result**



\* Commercial banks are allowed to disclose the information in form of "Graph"  
 \*\* Together with an analysis of outliers from Backtesting

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P&L date	VaR (in THB MM)	Hypo P&L (in THB MM)	Explanation
(T)	(T - 1)	(T)	
3-Mar-20	33.08	51.91	This is a positive VAR back testing break. The gain mainly driven by USD/THB FX forward 11 tenor buckets, where USD/THB forward rate appreciated by 0.0294% on a long \$424mm position, and also due to Daily Loss is mainly driven by the delta effect of derivative positions.
4-Mar-20	33.86	-50.70	This is coming from the following offshore THB LIBOR tenors: - 3M to 6M tenors increased by 27.12 to 44.27 bps with negative \$16k DV01, resulting to a loss of \$764k. MFVC vols for the same tenor is 9bps to 12bps - 1Y to 4Y tenors decreased by 7.50 to 10.53 bps with a positive \$194k DV01, resulting to a loss of \$1,678k. MFVC vols for the same tenor is 5bps to 6bps
5-Mar-20	31.82	55.97	This is a positive VAR back testing break. The gain mainly driven by the increase of THB LIBOR in 1Y-4Y tenor by 4bps to 6bps and lower rate in 3M-6M tenor by -20bps to -29bps. Risk position in 1Y-4Y is positive DV01 \$196k/bp and negative DV01 -\$15k/bp in 3M-6M, hence resulting positive MTM
9-Mar-20	23.47	58.22	This is a positive VAR back testing break. The gain mainly driven by the lower THB government bonds yield where the yield in 15Y went up by 7bps and 20Y went up by 6bps whereas the MFVC vols for those tenors were lower than 6bps
11-Mar-20	21.01	-23.24	The negative VAR backtesting break was mainly due to higher government bonds yield where the yield in 15Y went up by 7bps and 20Y went up by 6bps whereas the MFVC vols for those tenors were lower than 6bps
13-Mar-20	29.15	53.46	This is a positive VAR back testing break. The gain mainly driven by the increase of onshore THB LIBOR in 10Y tenor by 21bps with a positive DV01 \$159k/bp.
16-Mar-20	37.14	-61.76	The negative VAR backtesting break was mainly driven by the delta effect of derivative positions which is coming from onshore THB LIBOR 3Y to 10Y tenors which decreased by 6.00 to 7.00 bps with a positive \$233k DV01, whereas the MFVC vols for the same tenors are between 5bps to 6bps
17-Mar-20	39.72	45.53	This is a positive VAR back testing break. The gain mainly driven by the increase of onshore THB LIBOR in 10Y tenor by 8bps with a positive DV01 \$155k/bp.
20-Mar-20	75.80	-98.21	The Negative break was mainly driven by the delta effect of derivative positions which is coming from the onshore THB LIBOR 1Y to 10Y tenors which decreased by 6.00 to 17.50 bps with a positive \$149k DV01, whereas the MFVC vols were between 5bps to 6bps which are lower

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**Table 17 Equity exposures in the banking book**

Unit : Million Baht

Equity exposures	December 2020	December 2019
1. 1. Equity exposures		
1. Equities listed and publicly traded in the Stock Exchange		
- Book value		
- Fair value		
1.2 Other equities		
2. Gains (losses) of sale of equities in the reporting period		
3. Net revaluation surplus( deficit ) from valuation of AFS equity		
4. Minimum capital requirements for equity exposures classified by the calculation methods		
- SA		
- IRB		
5. Equity values for commercial banks applying IRB which the Bank of Thailand allows to use		
	N/A	N/A

**Table 18 The effect of changes in interest rates to net earnings in the banking book**

Unit : Million Baht

Currency	December 2020	December 2019
	Effect to net earnings	Effect to net earnings
THB	-104	-348
USD	46	18
EURO	0	0
Others	0	0
<b>Total effect</b>	<b>-58</b>	<b>-330</b>

Percentage changes in interest rates of 100 bps

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**Table 19 Liquidity Coverage Ratio (LCR)**

	Unit : Million Baht	
	Average Q4'2020	Average Q4'2019
<b>(1) Total high-quality liquid assets (HQLA)</b>	57,366	52,882
<b>(2) Total net cash outflows within the 30-day time horizon</b>	13,806	13,790
<b>(3) LCR* (%)</b>	416%	384%
<i>Minimum LCR as specified by the Bank of Thailand (%)</i>	<i>100%</i>	<i>90%</i>

LCR\* in Item (3) is not necessarily equal to the total high-quality liquid assets (Item (1)) divided by the total net cash outflows within the 30-day time horizon (Item (2))

Commercial banks are required to maintain the liquidity coverage ratio in accordance with the guidelines as specified by the Bank of Thailand. The LCR is expected to encourage commercial banks to have robust and adequate liquidity position so that they can survive short-term severe liquidity stress. The minimum LCR, which is the ratio of high-quality liquid assets to total net cash outflows within the 30-day time horizon, of 60% was introduced on 1 January 2016, and increased by 10% each year until it reaches 100% in 2020.

The average LCR for the 4th quarter of 2020 of the “Bank” was 416%, which was 316% higher than the minimum LCR as specified by the Bank of Thailand. This average figure was calculated from the ratio as of the end of each month which was 433% at October, 408% at November and 407% at December. The LCR consists of two main components, namely:

- 1) **High-quality liquid assets (HQLA)** include unencumbered high-quality assets with low risk and low volatility that can be easily monetized without any significant changes to their values, even in times of liquidity stress. The value of each type of HQLA is after the application of both haircuts and any applicable caps as specified by the Bank of Thailand.

The average HQLA of the “Bank” during the last quarter of 2020 was 57,336 million Baht which was Level 1 assets, namely government bonds and cash. On this, the “Bank” holds several types of high-quality liquid assets to ensure the diversification of the stock of HQLA.

- 2) **The amount of net cash outflows** is equal to expected cash outflows within the 30-day time horizon minus expected cash inflows within the 30-day time horizon under liquidity stress scenarios; but the expected cash inflows must not exceed 75% of the expected cash outflows.

The average net COF of the “Bank” for the 4th quarter of 2020 was 13,806 million Baht, which was the average of net cash outflows within the 30-day time horizon as at the end of October - December. The expected cash outflows on which the “Bank” focuses under the severe liquidity stress scenarios are Deposits run-off at the run-off rates as specified by the Bank of Thailand. On the other hand, expected cash inflows are mostly from loan repayments from high-quality counterparties and customers, to which the inflow rates as specified by the Bank of Thailand have been assigned.

In addition, the “Bank” also regularly examines its liquidity gaps and funding concentrations, which is part of the assessment and analysis of liquidity risk, to ensure that it has adequate liquidity to

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support the business. And, as the “Bank” has developed risk-monitoring tools in accordance with the internal policy and business directions so that the “Bank” can better manage its liquidity positions.

**Table 20 LCR Comparison**

Unit : %

	Average 2020	Average 2019
3rd quarter	464%	420%
4th quarter	416%	384%