

Bait Al Mal Al Khaleeji (BMK)
PILLAR 3 REGULATORY CAPITAL DISCLOSURES

For the period ended December 31, 2019





بيت المال الخليجي

Pillar III Disclosure:

This disclosure is presented by Bait Al Mal Al Khaleeji ("BMK") licensed by Capital Market Authority ("CMA") license number 08123-37.

Overview:

This disclosure sets the minimum requirements for the annual market disclosure of information as referred to by the article 68 of the Prudential Rules (PRs).

Purpose:

The purpose from this disclosure is for the market participants to assess the key pieces of information on the scope of application, capital, risk exposure, risk assessment processes, and hence the capital adequacy of the APs.

Capital Structure:

Amount of Tier I capital:

Description	Amount 2019	Amount 2018
Paid-up capital	80,000,000	80,000,000
Audited retained earnings	(32,366,222)	(34,416,750)
Intangible Assets	(4,894)	(58,803)
Total amount of Tier 1 capital	47,628,884	45,524,447

Amount of Tier II capital:

Description	Amount 2019	Amount 2018
Credit risk	18,927,068	17,585,999
Market risk	6,477,008	1,091,370
Operational risk	1,930,705	1,471,102
Total Tier 1	27,334,781	20,148,471
Concentration risk	7,325,931	7,526,354
Liquidity risk	-	-
Legal risk	-	-
Strategic risk	257,150	342,024
Reputational risk	1,828,796	1,864,594
Total Tier 2	9,411,877	9,732,973
ICAAP capital requirement	36,746,658	29,881,444
Additional capital required	(1,283,571)	(1,060,906)
Capital Base	47,628,884	45,524,447
Surplus (Deficit) in Capital Base	9,598,655	14,582,097
Capital Ratio	1.25	1.47

Capital Adequacy:

Risk appetite is defined as the magnitude of all risks that the Company is willing to undertake in order to achieve its desired business objectives. Risk appetite is reflected by risk indicators, and is managed by well-defined risk limits based on the risk area.

Currently, the ICAAP represents the capital requirements that are minimally required to meet the business needs and cover future losses that may arise to the Company.

The business strategy of the Company will be defined in alignment with the risk strategy and appetite of the Company keeping in view the same action plan that the Company is following the foregoing approach.

Timing

- The effective date of ICAAP calculations for the purpose of its submission to authorities is 29 May 2020. The events during the intervening period have been considered for their potential impact on the ICAAP. The major events noted during the period were swap of equity investment with the unit of mutual funds (equity based) under management. The plan to dispose real estate investments. These events do not expect to have any change in the model or basis on which ICAAP has been prepared because swap of investment is just another form of investment responsive to same risk profile. However, investment in real estate is still considered as a high risk exposure because it is being the quantum of investment involved in it.
- The capital has been assessed over a horizon of one year either using a historical data or budgeted growth factors. Since, the Company is being engaged in asset management business and most of its assets either in the short term category or planned to be utilized in the same horizon as such: equity investments, later swapped with mutual fund investments, are being held primarily for trading purposes and real estate investments have been planned to be diluted in upcoming period.

Risk Management:

The Company's assessment of risk profile led to the identification of following risk under:

1) Pillar I

- a) Credit risk;
- b) Market risk; and
- c) Operational risk.

2) Pillar II

- a) Concentration risk;
- b) Liquidity risk;
- c) Legal risk



- d) Strategy risk; and
e) Reputational risk

The characteristics, assessment and methodology followed in assessment of each of the above risks are detailed hereunder:

a) Credit risk

The Company does not regularly make investments in any of the categories other than HFT. Hence, credit risk is identified pertaining to its only investment in real estate sector, which mainly comprises of land.

The Company calculates the capital charge for credit risk by applying the Standardized Approach as used in regulatory return for Pillar I. In using this approach, all balances (Company and others assets) and investments, excluding the trading portfolio, are categorized into the relevant buckets as prescribed in guidelines. Appropriate risk weights, based on credit ratings of counterparties are applied to determine the Company's overall credit risk weighted assets. The Investment portfolio of the Company includes investments in shares of land i.e. real estate, which have been classified as investment properties being held to be used in the business. The investment property is carried at cost and is subject to credit risk under the standardized approach as promulgated by CMA through its regulation.

ICAAP purposes it is taken at regular level and has been taken into account in the concentration risk. Additionally, the management has commenced the available option to utilize the land into business opportunity and the fair value as per the valuation from two independent evaluators is higher than its book value. Accordingly, in the presence of viable utilization plan it is not considered a direct high credit risk item. This has resulted in reduction of capital charge from SR 36,746,658 (2018: SR 29,881,444) to SR 27,334,781 (2018: SR 20,148,471). Following is the GAP Analysis schedule:

Description	Balance as at 31 Dec 2018	Maturity						
		0-30 days	1 - 3 months	3 - 6 months	6 months - 1 year	1 year - 2 years	2 years - 5 years	more than 5 years
ASSETS								
Cash & cash equivalents	2,227,077	850,000	1,000,000	377,077	-	-	-	-
Financial Assets at fair value through profit and loss	24,029,363	-	-	10,000,000	14,029,363	-	-	-
Prepayments and other receivable	432,255	300,000	100,000	32,255	-	-	-	-
Right of use assets	6,134,874	80,000	240,000	240,000	480,000	960,000	2,880,000	125,4874
Investment in an associate	240,000	-	-	-	-	240,000	-	-
Investment properties	28,572,214	-	-	-	28,572,214	-	-	-
Intangible assets	4,894	-	4,894	-	-	-	-	-
Property and equipment	12,769	5,000	5,000	2,769	-	-	-	-
Total assets	61,653,446	1,235,000	1,349,894	10,652,101	43,081,577	1,200,000	2,880,000	1,254,874
Total assets after 5% stress of run off	58,570,774	1,173,250	1,282,399	10,119,496	40,927,498	1,140,000	2,736,000	1,192,130



LIABILITIES								
Accrued and other liabilities	700,199	300,000	400,199	-	-	-	-	-
Zakat payable	488,753	-	-	488,753	-	-	-	-
Short term borrowings	6,320,435	-	-	-	6,320,435	-	-	-
Lease liability	869,303	72,440	217,330	217,330	362,203	-	-	-
Lease liability - non current	5,300,246	-	-	-	-	870,000	2,610,000	1,820,246
Employee termination benefits	340,732	-	-	-	200,000	140,732	-	-
Total liabilities	14,019,668	372,440	617,529	706,083	6,882,638	1,010,732	2,610,000	1,820,246
Net gap	800,810	664,870	9,413,413	34,044,860	129,268	126,000	628,116	-
Cumulative net gap	800,810	1,465,680	10,879,093	44,923,953	45,053,221	45,179,221	44,551,106	-
Operational cashflows available stressed at 10%	-	76,500	45,275	9,247,522	13,058,427	1,080,000	2,592,000	1,129,387
Net GAP after cashflows	-	877,310	619,596	18,660,935	47,103,287	1,209,268	2,718,000	501,271
Average funding requirement upto 1 year	-	-	-	-	-	-	-	-
Total annual funding requirement	-	-	-	-	-	-	-	-

b) Market risk

The market risk of the Company lies in Held for Trading "HFT" equity investments. This risk is being assessed as per its risk management policy manual using a Value at Risk "VaR" model. The Company's HFT exposure's VaR is computed based on 1 year historical data using a 99% confidence level with the assumption of 1 day holding period.

For the purposes of ICAAP a conservative approach is following this VaR which is compared with regulatory capital requirement and higher amount is considered. Currently, the VaR is lower than regulatory allocated capital. Hence, the regulatory charge is also considered as internal capital requirement as well.

VaR is a widely used measure for the assessment of portfolio risk. However, it has a drawback of excusing risk correlation co-efficient, but it is still widely used so far has proven to be an appropriate measure of portfolio analysis and management.

c) Operational risk

Operational Risk within the Company mainly originates from the following events:

- Fraud (internal and external);
- Error resulting from the direct or indirect actions of staff;
- Risk of information systems failure;
- Absence of standard operating procedures; and
- Non-adherence to policies and procedures;

The Company has a well-defined policies and procedures manual duly approved by the Board of Directors. Policies and procedural manual is designed in such a way to prevent, detect and correct inherent risks in the business.

Operational risk, being moderately significant, is effectively managed through control processes established in standard operating procedures for each business line, obtaining insurance where appropriate, as well as a comprehensive internal audit and review process.





Assessment of the operational risk is performed through event/instance analysis on the basis of criteria included in its risk management policy framework. The management of operational risks in the three infrastructural elements namely: People, Systems and Processes of the Company.

The approach for operational risk followed is same as used in regulatory return. Since, the budgeted position of the Company is growing, the capital charge allocated for regulatory purposes is considered to be the best representative of its appetite.

d) Concentration risk

The financing and investment portfolio of the Company consists of exposures in two economic sectors namely equity portfolio/investment funds and real estate. Since all the equity investments are classified as HFT and individually none of those hold a significant value or excessive exposure only investment in land is considered for the purposes.

Any exposure over and above the 25% of the total available capital of the Company is considered as highly concentrated and is considered for risk measurement. The resultant amount is factored by 14% to arrive at capital charge.

The capital limit is taken from regulatory guidelines as the Company is allowed to have an exposure over and above this amount.

e) Liquidity risk

The Company's liquidity risk is assessed through mismatch of assets and liabilities maturities over at least next one year's horizon.

The liquidity risk is assessed using the maturity ladder approach which involves analyzing liquidity gaps in different time periods. This approach enables the Company in assessing the gaps between the inflows and the outflows so that remedial measures could be taken in time.

The negative gaps due to mismatches between the maturities of the assets and liabilities are taken and adjusted with operational cash flows that are already stressed at 10%. An annual average funding requirement is computed using the net negative gaps and a cost of fund is arrived at. This cost is taken as capital charge because it is presumed to have direct effect on the earning.

Currently, the maturity mismatch of the Company is in positive condition, hence, the measured amount of risk is also Nil.

Currently the liquidity is monitored by the management and BOD through projected cash in certain future period.

f) Legal risk

Legal risk is arising from uncertainty due to legal actions or uncertainty in the applicability or interpretation of contracts, laws or regulations. Legal risk also includes risk arising from the lack of proper documentation of contracts.

The Company assesses the extent of legal risk by monitoring certain indicators which are indicative of risk concerns. The indicators are:

- a- Internally identified erroneous non-compliances;
- b- History of non-compliance events identified by CMA;
- c- No. of cases filed against the company;
- d- Duration of time for each case;
- e- Strength of documentation of each case. e.g. the strength of collateral documentation;
- f- Value of the claim; and
- g- Complexity involved in the case i.e. regulatory concerns, cross-border cases.

The risk is measured by taking the un-avoidable and covered legal cases against the Company. These are factored at business growth factor to arrive at capital charge amount.

g) Strategic risk

Strategic risk arises from inaccurate business decisions, changes in the economic environment, deficient or insufficient implementation of decisions, or a failure to adapt to changes in the economic environment.

The sources of strategic risk are categorized into 3 components:

- a- Strategic governance and oversight;
- b- Strategic formation; and
- c- Strategic implementation

Strategic risk is assessed using the negative variance between actual return on assets and budgeted return on assets which using a 99% confidence level are used to compute the worst case loss. This loss after dividing with budgeted net asset employed provides the worst loss case capital charge. This capital charge is decayed over a score where the average score from a survey within the organization is used to choose the relevant charge.

Those factors used for scoring are also used to analyse the qualitative aspect of strategy alignment.

h) Reputational risk

The reputation risk can arise from following sources:

- a- No. of complaints lodged by customers;
- b- Failure to comply with regulatory or legal obligations;
- c- Failure to deliver minimum standards of service and product quality to customers;
- d- Unethical practices in the conduct of business;
- e- Failure to achieve financial performance targets;
- f- Association with suppliers, partners and alliances with poor reputations; and
- g- Employee dissatisfaction and negative publicity by media.

Due to limitation of data and any other measure in the absence of the Company's market capitalization the following steps are used to qualitatively keep the risk under controlled.

- Effective communication with stakeholders; and
- Enforcement of controls on governance, business and legal compliance.

