Appendix CA-12

Comprehensive Example of Deductions and T2 2% Cap

Bank "x" with Total Capital of 10,000,000 before deductions (consisting of 5,500,000 CET 1 and 4,500,000 Tier 2) has made three investments listed below. This time the investment in bank 'a' is increased to 1,800,000 to trigger heavier deductions.

Investment	Amount
Bank 'a'	<mark>1,800,000</mark>
Insurance entity 'b'	3,000,000 ¹
Bancassurance 'c'	<u>_500,000²</u>
Total	<mark>5,300,000</mark>

The first step is to calculate deductions in CA-2.4.2 to CA-2.4.15 to calculate CET1a. The bank has goodwill of 100,000 from the previous acquisition of a subsidiary. Of its 500,000 investment in Bancassurance 'c', 400,000 is reciprocated by Bancassurance 'c' in Bank 'x' so the reciprocal cross-holding of 400,000 of CET1 and the goodwill must be deducted below.

Determination of CET1a:

	CET1	Tier 2
CET1 and T2	5,500,000	<mark>4,500,000</mark>
Goodwill ³	(100,000)	-
Reciprocal cross-holding	(400,000)	
Resulting CET1a and T2	5,000,000	<mark>4,500,000</mark>

The second step is to see if the residual investment of 100,000 in bankassurance 'b' exceeds 10% of CET1a (CA-2.4.16). It does not so CET1b (CA-2.4.19) is the same as CET1a. There are no other investments in AT1 or T2 of other financial entities that require deduction (CA-2.4.21) from CET1b, so CET1b is the same as CET1c. The investment of 1,800,000 in bank 'a' represents 43.2% of the CET1 of bank 'a' (CA-2.4.20). The third step is to see if the investment in bank 'a' exceeds 10% of CET1 of bank 'x' (CA-2.4.23). The investment of 1,800,000 in bank 'a' represents 36% of bank 'x's CET1a. A deduction of 1,300,000 is required from CET1c of bank 'x' in respect of bank 'a' (CA-2.4.23). The amount of 500,000 is weighted at 250%. Also, the investment in insurance entity 'b' must be fully deducted because this too is in excess of the 10% threshold that has already been used by the investment in bank 'a' (see also CA-2.4.23). These deductions are shown on the following page. The concerned investments and deductions are shown below.

Investment	Amount	Deduction requirement (For full rules refer to section CA-2.4)	
Bank "a"	1,800,000	1,300,000	
Insurance entity "b"	3,000,000	3,000,000	
Bancassurance "c"	<u>500,000</u>	<u>400,000</u>	
Total	5,300,000	4,700,000	

¹ This investment is 25% of the capital of insurance entity 'b'.

² This holding is 2% of entity 'c's CET1. Entity 'c' has also made a reciprocal cross-holding in CET1 of Bank 'x' amounting to 400,000. This amount must be deducted from CET1 of bank 'x'. ³ This represents goodwill arising at the time of acquisition of a consolidated subsidiary.



Determination of CET1d:		
	CET1a	Tier 2
CET1c and T2	5,000,000	4,500,000
Bank 'a'	(1,300,000)	
Insurance entity 'b'	(3,000,000)	
Resulting CET1d and T2	700,000	4,500,000
Eligible CET1d and T2	700,000	200,000 ⁴
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Required minimum CET1 = 6.5% Required minimum Tier 1 = 8.0% Required minimum Total Capital = 10.0% Cap of contribution of T2 to minimum Total Capital = 2.0%

Calculation of CAR:

CAR = <u>Eligible Total Capital</u> Risk-Weighted Assets

= (700,000 + 200,000) = 900,000 = 9.0%(Say) 10,000,000 = 10,000,000

The CET1 capital ratio of 7.0% exceeds the minimum required CET1 ratio in CA-B.2.1 (6.5%), but does not meet the required minimum T1 ratio of 8.0%. Tier Two is limited to a 2% contribution to minimum required Total Capital . Total Capital ratio is therefore 9%, thus failing to meet the minimum required Total Capital Ratio of 10%. This also means that the bank fails to meet any of the minimum required ratios including the capital conservation buffer (CET1 = 9.0%, T1 = 10.5%, and Total Capital = 12.5%), so the bank is precluded from paying dividends and bonuses to staff. This example with Appendix CA-11 shows how quickly a bank which relies excessively on T2 capital can find itself in extreme difficulties through a loss or deduction from CET1.

⁴ Tier 2 can only contribute 2% to the minimum required Total Capital Ratio of 12.5% (CA-2.2.2).