IIG BANK (MALTA) LTD

Annual Report and Financial Statements 31 December 2016

Company Registration Number: C48767

# IIG BANK (MALTA) LTD Annual Report and Financial Statements - 31 December 2016

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# Directors' report

The directors present their annual report and the audited financial statements of IIG Bank (Malta) Ltd (the "Bank") for the year ended 31 December 2016.

#### **Principal activities**

The principal activity of IIG Bank (Malta) Ltd is the operation of a credit institution under the Banking Act, Cap 371 of the Laws of Malta, in accordance with the credit institution licence granted by the Malta Financial Services Authority.

The Bank's primary activity consists of international trade finance. It is a lender and facilitator to a client base of traders engaged in the import and export of consumer consumables, construction materials, energy products and other goods traded all over the world, including business opportunities involving emerging markets. Funding for this core business activity is sourced primarily from the domestic market attracting savers with competitive interest rates for term deposits denominated in EUR, GBP and USD ranging from one to five years maturity.

#### Review of the business

Performance: IIG Bank continued to register significant progress in developing its business strategy which is targeted towards a global presence in international trade and commodity finance. This development was supported by yet another year of significant profits despite a focus on maintaining balance sheet size consistent with the average level of 2015, while concentrating on maintaining customer deposits within the desired parameters commensurate to asset growth. During the year, significant progress was made in the internal organisational structure, with additional recruitment of skilled human resources, enhancing the operations team, risk management and compliance functions.

Income Statement: During the financial year under review, the Bank registered a profit of US\$2,818,090 (2015: US\$4,251,718). The key components of the income statement are: net interest income of US\$5,516,183 (2015: US\$5,083,909), net fee and commission income of US\$813,043 (2015: US\$556,185), gains on disposal of available-for-sale financial assets of US\$5,395,295 (2015: US\$3,220,329), resulting in an operating income of US\$11,384,825 (2015: US\$9,498,958). The administrative expenses for the year were US\$2,905,467 (2015: US\$2,627,452) and net impairment charges of US\$4,111,992 resulted in profit before tax of US\$4,367,366 (2015: US\$6,543,793). The net impairment charge to profit and loss includes a write-off of US\$3,201,188 (see Note 25).

Balance Sheet: The year-end balance sheet position of US\$154,109,412 (2015: US\$192,789,076), reflect the effort made to reduce the level of unapplied cash balances which featured in loans and advances to banks (2015: US\$58,180,981). A reduction in excess funding of US\$37,501,537 was achieved, thereby reducing the funding cost for the Bank. Loans and advances grew to US\$89,031,527 (2015 US\$82,186,100) and investments in financial assets were reduced to US\$20,679,444 (2015: US\$58,180,981). The reduction in the investment portfolio was made to realise profit, while reducing market risk on bond holdings, given the prevailing market expectations. As mentioned, and in line with strategy, customer deposits reduced to US\$120,670,756 (2015: US\$143,670,301).

Outlook for 2017: The Bank has now built a regular customer base on both the deposit liabilities side of the business and its loan asset portfolio. Significant progress and opportunities of business continue to flow despite the moderate marketing effort, as the Bank concentrates to maintain its high standard of service delivery to its clients. The initial economic indicators and inflationary expectations for 2017 are encouraging and should lead to increased levels of activity and global trade. The Bank is very well prepared to take advantage of the evolving opportunities, while still retaining a very positive growth outlook should market conditions not develop in line with existing expectations.

## Directors' report (continued)

#### Key performance indicators

The Board of Directors tracks the Bank's progress in implementing its strategy with a range of financial measures or key performance indicators ('KPIs'). Progress is assessed by comparison with the Bank's budgets and historical performance. The financial KPIs tracked by the Board of the Bank are presented in the following table.

	2016	2015
Profit before tax	US\$4,367,366	US\$6,543,793
Cost to income ratio	64%	38%
Return on equity	11%	18%
Capital Adequacy Ratio	15.80%	15.01%

The Board of Directors does not monitor any specific non-financial KPIs.

## Risk management

IIG Bank faces a range of business, financial and operational risks. The Bank adopts a robust corporate governance framework with a bank-wide risk management approach, to understand what its risks are, how much risk is acceptable, and to be able to manage it to create value for shareholders while meeting regulatory requirements ensuring integrity, ethical and transparent behaviour.

At a strategic level, the Bank's financial risk management objectives are:

- i. To ensure appropriate identification of the Bank's significant risks;
- ii. To ensure that the Bank's plans are consistent with its Risk Appetite;
- iii. To optimise risk/return decisions by taking them as closely as possible to the business, while establishing strong and independent review and challenge structures; and
- iv. To help the Bank's Management improve the control and co-ordination of risk taking across the business.

Also, as part of embedding a strong risk culture, the Bank recognises the need to have the required resources in place for effective risk management. In this respect, during 2016, the Bank has increased the head count within its dedicated risk management function to meet the increased demand fuelled by the Bank's growth.

A detailed review of the Bank's use of financial instruments, its exposure to liquidity risk, credit risk and market risk, and the respective financial risk management objectives and policies, is included in Note 2 to the financial statements.

## Results and dividends

The income statement is set out on page 10. During 2016, the directors proposed and paid a net final dividend of US\$4,250,000 relative to the financial year ended 31 December 2015 (2015 for financial year 2014: US\$1,755,000). The proceeds of the dividends together with a further shareholder contribution were re-invested in the Bank.

## Directors' report (continued)

#### Directors

The directors of the Bank who held office during the year were:

Joseph Grioli - Chairman Raymond Busuttil David Hu James Douglas Nelson Martin S. Silver Karl Vella

In accordance with the Bank's articles of association, the directors remain in office until they resign or are otherwise removed from office.

#### Statement of directors' responsibilities for the financial statements

The directors are required by the Maltese Banking Act (Cap. 371) and the Maltese Companies Act (Cap. 386) to prepare financial statements that give a true and fair view of the state of affairs of the Bank as at the end of each reporting period and of the profit or loss for that period.

In preparing the financial statements, the directors are responsible for:

- ensuring that the financial statements have been drawn up in accordance with International Financial Reporting Standards as adopted by the EU;
- selecting and applying appropriate accounting policies;
- · making accounting estimates that are reasonable in the circumstances; and
- ensuring that the financial statements are prepared on the going concern basis unless it is inappropriate to presume that the Bank will continue in business as a going concern.

The financial statements of IIG Bank (Malta) Ltd for the year ended 31 December 2016 are included in the Annual Report 2016, which is published in hard-copy printed form and may be made available on the Bank's website. The directors are responsible for the maintenance and integrity of the Annual Report on the website in view of their responsibility for the controls over, and the security of, the website. Access to information published on the Bank's website is available in other countries and jurisdictions, where legislation governing the preparation and dissemination of financial statements may differ from requirements or practice in Malta.

The directors are also responsible for designing, implementing and maintaining internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error, and that comply with the Maltese Banking Act (Cap. 371) and the Maltese Companies Act (Cap. 386). They are also responsible for safeguarding the assets of the Bank and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

# Directors' report (continued)

#### **Auditors**

PricewaterhouseCoopers have indicated their willingness to continue in office and a resolution for their reappointment will be proposed at the Annual General Meeting.

On behalf of the board

Joseph Grioli Director

Registered Office: Level 20 Portomaso Business Tower St. Julians STS4011 Malta

20 April 2017

Raymond Busuttil Director

Company Secretary: Karl Vella

Telephone number: 22484500



# Independent auditor's report

To the Shareholders of IIG Bank (Malta) Ltd

# Report on the audit of the financial statements

# Our opinion

#### In our opinion:

- IIG Bank (Malta) Ltd's financial statements give a true and fair view of the Bank's financial position as at 31 December 31 2016, and of the Bank's financial performance and cash flows for the year then ended in accordance with International Financial Reporting Standards ('IFRSs') as adopted by the EU; and
- The financial statements have been prepared in accordance with the requirements of the Maltese Banking Act (Cap. 371) and the Maltese Companies Act (Cap. 386).

#### What we have audited

IIG Bank (Malta) Ltd's financial statements, set out on pages 9 to 60, comprise:

- the statement of financial position as at 31 December 2016;
- the statement of comprehensive income for the year then ended;
- the statement of changes in equity for the year then ended;
- the statement of cash flows for the year then ended; and
- the notes to the financial statements, which include a summary of significant accounting policies.

#### Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### Independence

We are independent of the Bank in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) together with the ethical requirements of the Accountancy Profession (Code of Ethics for Warrant Holders) Directive issued in terms of the Accountancy Profession Act (Cap. 281) that are relevant to our audit of the financial statements in Malta. We have fulfilled our other ethical responsibilities in accordance with the IESBA Code.



# Independent auditor's report - continued

To the Shareholders of IIG Bank (Malta) Ltd

# Other information

The directors are responsible for the other information. The other information comprises the Directors' report and the Additional Regulatory Disclosures, which we obtained prior to the date of this auditor's report.

Our opinion on the financial statements does not cover the other information.

In connection with our audit of the financial statements, our responsibility is to read the other information identified above and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

With respect to the Directors' report, we also considered whether the Directors' report includes the disclosures required by Article 177 of the Maltese Companies Act (Cap. 386).

Based on the work we have performed, in our opinion:

- The information given in the Directors' report for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- The Directors' report has been prepared in accordance with the Maltese Companies Act (Cap. 386).

In addition, in light of the knowledge and understanding of the Bank and its environment obtained in the course of the audit, we are required to report if we have identified material misstatements in the Directors' report and other information that we obtained prior to the date of this auditor's report. We have nothing to report in this regard.

# Responsibilities of the directors and those charged with governance for the financial statements

The directors are responsible for the preparation of financial statements that give a true and fair view in accordance with IFRSs as adopted by the EU and the requirements of the Banking Act 1994 and the Maltese Companies Act (Cap. 386), and for such internal control as the directors determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are responsible for assessing the Bank's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the Bank or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Bank's financial reporting process.



# Independent auditor's report - continued

To the Shareholders of IIG Bank (Malta) Ltd

# Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgement and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the directors.
- Conclude on the appropriateness of the directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Bank to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.



# Independent auditor's report - continued

To the Shareholders of IIG Bank (Malta) Ltd

# Report on other legal and regulatory requirements

Opinion on other matters prescribed by the Maltese Banking Act (Cap. 371)

#### In our opinion:

- we have obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of our audit;
- proper books of account have been kept by the Bank, so far as appears from our examination of those books;
- the Bank's financial statements are in agreement with the books of account; and
- to the best of our knowledge and according to the explanations given to us, the financial statements give the information required by any law in force in the manner so required.

# Other matters on which we are required to report by exception

We also have responsibilities under the Maltese Companies Act (Cap. 386) to report to you if, in our opinion:

- returns adequate for our audit have not been received from branches not visited by us; and
- certain disclosures of directors' remuneration specified by law are not made in the financial statements, giving the required particulars in our report.

We have nothing to report to you in respect of these responsibilities.

# **PricewaterhouseCoopers**

78, Mill Street Qormi Malta

Fabio Axisa Partner

20 April 2017

# Statement of financial position

		As at 31 December		
	Notes	2016 US\$	2015 US\$	
ASSETS Cash and balances with Central Bank of Malta Financial assets designated as at fair value	4	3,869,089	679,867	
through profit or loss	5	11,609,537	2,725,250	
Financial assets classified as available-for-sale	6	26,292,206	46,036,597	
Loans and advances to banks	7	20,679,444	58,180,981	
Loans and advances to customers	8	89,031,527	82,186,100	
Property, plant and equipment	9	148,669	159,790	
Intangible assets	10	61,127	69,161	
Deferred tax assets	11	131,534	09,101	
Accrued income and other assets	12	2,286,279	2,751,330	
Total assets		154,109,412	192,789,076	
EQUITY AND LIABILITIES				
<b>Equity</b> Share capital	13	22,500,000	16,300,000	
Fair value reserve	14	377,085	2,840,101	
Other reserve	15	14,790	2,040,101	
Retained earnings	10	2,855,529	4,302,229	
Total equity		25,747,404	23,442,330	
Liabilities				
Amounts owed to customers	16	120,670,756	143,670,301	
Amounts owed to banks	17	3,350,010	19,463,207	
Derivative financial instruments	18	1,374,781	1,380,322	
Current tax liabilities		1,860,218	2,313,319	
Deferred tax liabilities	11	-	1,502,475	
Other liabilities	19	1,106,243	1,017,122	
Total liabilities		128,362,008	169,346,746	
Total equity and liabilities		154,109,412	192,789,076	
MEMORANDUM ITEMS Commitments	20	6,244,152	3,067,612	

The official closing middle rate of exchange applicable between US dollar and euro published by the European Central Bank as at 31 December 2016 was 1.0541 (2015: 1.0887).

The notes on pages 14 to 60 are an integral part of these financial statements.

The financial statements on pages 9 to 60 were authorised for issue by the board on 20 April 2017 and were signed on its behalf by:

Joseph Grioli

Director

Raymond Busuttil Director

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# Income statement

		Year ended 31	December
	Notes	2016 US\$	2015 US\$
Interest income Interest expense	21 22	8,408,071 (2,891,888)	8,457,980 (3,374,071)
Net interest income		5,516,183	5,083,909
Fee and commission income Fee and commission expense	23 23	1,538,090 (725,047)	1,086,316 (530,131)
Net fee and commission income		813,043	556,185
Net trading (losses)/gains Gains on disposal of available-for-sale financial assets	24	(339,696) 5,395,295	638,535 3,220,329
Operating income Net impairment charges Administrative expenses	25 26	11,384,825 (4,111,992) (2,905,467)	9,498,958 (327,713) (2,627,452)
Profit before tax Tax expense	27	4,367,366 (1,549,276)	6,543,793 (2,292,075)
Profit for the year		2,818,090	4,251,718

# Statement of comprehensive income

		Year ended 31 December		
	Notes	2016 US\$	2015 US\$	
Profit for the year		2,818,090	4,251,718	
Other comprehensive income:  Items that may be subsequently reclassified to profit or loss Fair valuation of available-for-sale financial assets:				
Net changes in fair value arising during the year, before tax Reclassification adjustments – net amounts reclassified to profit	6	1,606,039	509,941	
or loss upon disposal, before tax Income tax relating to components of other comprehensive		(5,395,295)	(3,220,329)	
income	11 _	1,326,240	948,636	
Other comprehensive income for the year, net of tax		(2,463,016)	(1,761,752)	
Total comprehensive income for the year	-	355,074	2,489,966	

# Statement of changes in equity

	Notes	Share capital US\$	Fair value reserve US\$	Other reserve US\$	Retained earnings US\$	Total equity US\$
Balance at 1 January 2015		13,735,000	4,601,853	-	1,805,511	20,142,364
Comprehensive income Profit for the year Other comprehensive income: Fair valuation of available-for- sale financial assets		-	-	-	4,251,718	4,251,718
Net changes in fair value arising during the year, net of tax  Reclassification adjustments – net amounts reclassified to profit	6,11	-	331,462	-	-	331,462
or loss, net of deferred tax		-	(2,093,214)	-	-	(2,093,214)
Total comprehensive income		-	(1,761,752)	-	4,251,718	2,489,966
Transactions with owners Issue of ordinary share capital Dividends to equity holders	13 28	2,565,000 -	- -	-	(1,755,000)	2,565,000 (1,755,000)
Total transactions with owners		2,565,000	-	-	(1,755,000)	810,000
Balance at 31 December 2015		16,300,000	2,840,101	-	4,302,229	23,442,330
	•					
Balance at 1 January 2016		16,300,000	2,840,101	-	4,302,229	23,442,330
Comprehensive income Profit for the year Other comprehensive income: Fair valuation of available-for- sale financial assets		· <u>-</u>	-	-	2,818,090	2,818,090
Net changes in fair value arising during the year, net of tax	6,11	-	1,043,925	-	-	1,043,925
Reclassification adjustments – net amounts reclassified to profit or loss, net of deferred tax		-	(3,506,941)	-	-	(3,506,941)
Total comprehensive income	•	-	(2,463,016)	-	2,818,090	355,074
Transactions with owners	•		· · · · · · · · · · · · · · · · · · ·			
Issue of ordinary share capital Dividends to equity holders Allocation of funds for	13 28	6,200,000 -			- (4,250,000)	6,200,000 (4,250,000)
general banking risks	15	-	-	14,790	(14,790)	
Total transactions with owners	•	6,200,000	•	14,790	(4,264,790)	1,950,000
Balance at 31 December 2016		22,500,000	377,085	14,790	2,855,529	25,747,404

# Statement of cash flows

		Year ended 31	December
	Notes	2016 US\$	2015 US\$
Operating activities Interest and commission income received Interest and commission expense paid Net income from foreign exchange transactions Tax paid Cash payments to employees and suppliers		10,691,842 (3,715,806) 1,040,671 (2,310,146) (2,758,990)	9,597,779 (3,741,699) 3,857,701 (1,028,726) (2,439,664)
Cash flows generated from operating activities before changes in operating assets and liabilities		2,947,571	6,245,391
Changes in operating assets and liabilities: Net increase in balances with Central Bank of Malta Net (increase)/decrease in loans and advances to banks Net increase in amounts attributable to Depositor Compensation Scheme	4 7 12	(27,007) (939,905) (160,296)	(97,931) 2,569,212 (159,532)
Net increase in loans and advances to customers Net (decrease)/increase in amounts owed to customers Net (decrease)/increase in amounts owed to banks	8 16 17	(10,957,419) (23,000,583) (16,113,197)	(21,306,262) 31,426,969 1,927,552
Net cash (used in)/generated from operating activities		(48,250,836)	20,605,399
Investing activities Purchase of available-for-sale investments Purchase of investments at fair value through	6	(46,732,962)	(31,537,614)
profit or loss Proceeds from disposal and redemptions of available-for-sale investments	5 6	(9,218,300) 67,024,392	(2,790,250) 34,503,826
Proceeds of disposal of investments at fair value through profit or loss Purchase of property, plant and equipment Purchase of intangible assets	5 9	- (33,319)	544,567 (106,690)
Net cash generated from investing activities	10	(18,202)	(23,712) 590,127
Financing activities Issue of ordinary share capital Dividends paid to equity holders	13 28	6,200,000 (4,250,000)	2,565,000 (1,755,000)
Net cash generated from financing activities	,	1,950,000	810,000
Net movement in cash and cash equivalents		(35,279,227)	22,005,526
Cash and cash equivalents at beginning of year		50,468,441	28,462,915
Cash and cash equivalents at end of year	29	15,189,214	50,468,441

#### Notes to the financial statements

#### 1. Summary of significant accounting policies

The principal accounting policies adopted in the preparation of these financial statements are set out below. Unless otherwise stated, these policies have been consistently applied to all the years presented.

#### 1.1 Basis of preparation

The Bank's financial statements have been prepared in accordance with the requirements of International Financial Reporting Standards (IFRSs) as adopted by the EU and with the requirements of the Banking Act, 1994 and the Maltese Companies Act, 1995. These financial statements are prepared under the historical cost convention, as modified by the fair valuation of financial assets and financial liabilities at fair value through profit or loss, including derivative financial instruments, and investments classified as available-for-sale.

The preparation of financial statements in conformity with IFRSs as adopted by the EU requires the use of certain accounting estimates. It also requires the directors to exercise their judgment in the process of applying the Bank's accounting policies (see Note 3 - Critical accounting estimates, and judgments in applying accounting policies).

Standards, interpretations and amendments to published standards effective in 2016

During the financial year ended 31 December 2016, the Bank adopted new standards, amendments and interpretations to existing standards that are mandatory for the Bank's accounting period beginning on 1 January 2016. The adoption of these revisions to the requirements of IFRSs as adopted by the EU did not result in substantial changes to the Bank's accounting policies.

Standards, interpretations and amendments to published standards that are not yet effective

Certain new standards, amendments and interpretations to existing standards have been published by the date of authorisation for issue of these financial statements but are mandatory for accounting periods beginning after 1 January 2016.

IFRS 9, 'Financial instruments', addresses the classification and measurement of financial assets and financial liabilities, impairment of financial assets and hedge accounting.

In this respect, during 2016, the Bank has set up an Implementation Programme ('the Programme') to prepare for IFRS 9 adoption. The Programme is sponsored by the Chief Finance Officer.

To date, the Programme has been directed towards preliminary impact analysis, particularly around risk modelling methodologies for the calculation of impairment. The Programme's focus during 2017 will be on finalising its impairment model as well as performing an impact assessment of the classification and measurement requirements.

#### Classification and measurement

IFRS 9 replaces the guidance in IAS 39 that relates to the classification and measurement of financial instruments. IFRS 9 retains but simplifies the mixed measurement model and establishes three primary measurement categories for financial assets: amortised cost, fair value through Other Comprehensive Income ('OCI') and fair value through profit or loss.

#### 1.1 Basis of preparation - continued

#### Classification and measurement - continued

The classification and measurement of financial assets will depend on how these are managed (the entity's business model) and their contractual cash flow characteristics. These factors determine whether the financial assets are measured at amortised cost, fair value through other comprehensive income ('FVOCI') or fair value through profit or loss ('FVPL').

The combined effect of the application of the business model and the contractual cash flow characteristics tests may result in some differences in the population of financial assets measured at amortised cost or fair value compared with IAS 39.

The Bank plans to conduct an assessment of potential classification and measurement changes to financial assets during 2017, based on the composition of the balance sheet as at 31 December 2016. This may not be fully representative of the impact as at 1 January 2018 because IFRS 9 requires that business models be assessed based on the facts and circumstances from the date of initial application. In addition, the contractual terms and conditions of the financial assets assessed as at 31 December 2016 may not reflect the contractual terms and conditions of the local group's financial assets at transition. The Bank plans to publish the impact of this assessment in its Annual Report and Financial Statements for the year ending 31 December 2017.

The classification of financial liabilities is expected to remain unchanged.

#### Impairment

There is now a new expected credit losses model that replaces the incurred loss impairment model used in IAS 39.

The impairment requirements apply to financial assets measured at amortised cost and FVOCI, and certain loan commitments and financial guarantee contracts. At initial recognition, an impairment allowance (or provision in the case of commitments and guarantees) is required for expected credit losses ('ECL') resulting from default events that are possible within the next 12 months ('12-month ECL').

In the event of a significant increase in credit risk, an allowance (or provision) is required for ECL resulting from all possible default events over the expected life of the financial instrument ('lifetime ECL'). Financial assets where 12-month ECL is recognised are considered to be 'stage 1'; financial assets which are considered to have experienced a significant increase in credit risk are in 'stage 2'; and financial assets for which there is objective evidence of impairment, so are considered to be in default or otherwise credit impaired, are in 'stage 3'.

The assessment of credit risk and the estimation of ECL are required to be unbiased and probability-weighted, and should incorporate all available information, which is relevant to the assessment including information about past events, current conditions and reasonable and supportable forecasts of economic conditions at the reporting date. In addition, the estimation of ECL should take into account the time value of money. As a result, the recognition and measurement of impairment is intended to be more forward-looking than under IAS 39 and the resulting impairment charge will tend to be more volatile. It will also tend to result in an increase in the total level of impairment allowances, since all financial assets will be assessed for at least 12-month ECL and the population of financial assets to which lifetime ECL applies is likely to be larger than the population for which there is objective evidence of impairment in accordance with IAS 39.

#### 1.1 Basis of preparation - continued

#### Impairment - continued

The Bank is still in the process of assessing the impact that the impairment requirements will have on its financial statements. The following similarities and differences are likely to be important to understanding the potential effect of the change in the Bank's impairment charge resulting from the implementation of IFRS 9.

#### Stage 1

In accordance with IAS 39, incurred but not yet identified impairment is recognised on individually assessed loans for which no evidence of impairment has been specifically identified by estimating a collective allowance determined after taking into account factors including the estimated period between impairment occurring and the loss being identified.

Under IFRS 9, financial assets which are not considered to have significantly increased in credit risk have loss allowances measured at an amount equal to 12 months ECL. This 12-month time horizon is likely to be equal to or longer than the period estimated under IAS 39, which will tend to result in IFRS 9 allowances being larger than the current collective impairment allowance charge.

#### Stage 2

With IFRS 9, financial assets are considered to be in stage 2 when their credit risk has increased significantly since initial recognition, so it is appropriate to recognise lifetime ECL. Since this is not a concept in IAS 39, it is likely to result in increased allowances as the result of the recognition of lifetime ECL for population of assets that are not considered to be credit impaired. Albeit, based on the portfolio composition as at 31 December 2016, the impact on the Bank is expected to be less material than for other banks, owing to the fact that less than 10% of the Bank's loans and advances to customers have contractual maturities in excess of one year.

For loans and advances whose contractual maturity exceeds 12 months, the Bank is still in the process of determining which criteria would be considered to constitute a significant increase in credit risk and whether credit quality disclosures included within this Annual Report may be reflective of the populations in stage 2.

#### Stage 3

Financial assets will be included in stage 3 when there is objective evidence that the loan is credit impaired. The objective evidence that is used is the same as the criteria used by the Bank to determine whether an individually significant loan is impaired in accordance with IAS 39. Therefore, the population included in stage 3 is expected to be consistent with impaired loans under IAS 39 which are considered individually significant. Changes may be made to these calculations to ensure the measurement requirements of IFRS 9 are met.

The policy on the write-off of loans and advances is expected to remain unchanged.

Until reliable estimates of the impact are available, particularly on the interaction with the regulatory capital requirements, further information on the expected impact on the financial position and on capital planning cannot be provided.

#### 1.1 Basis of preparation - continued

#### Hedge accounting

The general hedge accounting requirements aim to simplify hedge accounting, creating a stronger link with risk management strategy and permitting hedge accounting to be applied to a greater variety of hedging instruments and risks, but do not explicitly address macro hedge accounting strategies, which are particularly important for banks. As a result, IFRS 9 includes an accounting policy choice to remain with IAS 39 hedge accounting.

Although the Bank deploys hedging strategies to mitigate or offset risk that arise from its activities, none of its strategies achieve hedge accounting in terms of IAS 39. Accordingly, the Bank expects that IFRS 9 will have no impact in this regard.

#### Transition

The classification and measurement and impairment requirements are applied retrospectively by adjusting the opening balance sheet at the date of initial application, with no requirement to restate comparative periods. The mandatory application date for the standard as a whole is 1 January 2018. Thus, the Bank does not intend to restate its comparative periods. Accordingly, all adjustments resulting from the transition will be applied by adjusting the opening balance sheet as at 1 January 2018.

#### Comparison of IAS 39 accounting policies with IFRS 9

The accounting policies and accounting estimates and judgements for the impairment of loans and advances and available-for-sale financial assets (in accordance with IAS 39 'Financial Instruments') are set out in Note 1.4. Their equivalents for financial assets at amortised cost and at FVOCI (in accordance with IFRS 9) are expected to be developed during 2017.

# 1.2 Foreign currency transactions and balances

#### a) Functional and presentation currency

Items included in the financial statements are measured using the currency of the primary economic environment in which the entity operates ('the functional currency'). The financial statements are presented in US dollars, which is the Bank's functional and presentation currency.

#### b) Transactions and balances

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions or valuation where items are remeasured. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognised in profit or loss.

#### 1.3 Financial assets

The Bank classifies its financial assets in the following categories: at fair value through profit or loss, loans and receivables and available-for-sale investments. The classification depends on the purpose for which the financial assets were acquired. Management determines the classification of its financial assets at initial recognition.

#### 1.3 Financial assets - continued

Initial recognition and derecognition

The Bank recognises a financial asset in its statement of financial position when it becomes a party to the contractual provisions of the instrument. Regular way purchases and sales of financial assets are recognised on the trade date, which is the date on which the Bank commits to purchase or sell the asset. Accordingly, the Bank uses trade date accounting for regular way contracts when recording financial asset transactions.

Financial assets are derecognised when the rights to receive cash flows from the financial assets have expired or have been transferred and the Bank has transferred substantially all risks and rewards of ownership or the Bank has not retained control of the asset.

Financial assets at fair value through profit or loss

This category comprises two sub-categories: financial assets classified as held-for-trading, and financial assets designated by the Bank as at fair value through profit or loss upon initial recognition.

A financial asset is classified as held-for-trading if it is acquired principally for the purpose of selling or repurchasing it in the near term or if it is part of a portfolio of identified financial instruments that are managed together and for which there is evidence of a recent actual pattern of short-term profit-taking.

Derivatives are also categorised as held-for-trading unless they are designated and effective as hedging instruments. Assets in this category are classified as current assets if expected to be settled within twelve months; otherwise, they are classified as non-current.

The Bank's held-for-trading financial instruments consist of derivative contracts.

Financial instruments included in this category are recognised initially at fair value; transaction costs are taken directly to profit or loss. Gains and losses arising from changes in fair value are included directly in profit or loss and are reported as 'Net trading (losses)/gains'. Interest income on financial assets held-for-trading is also included in 'Net trading (losses)/gains'.

The Bank also designates certain financial assets upon initial recognition as at fair value through profit or loss (fair value option). This designation cannot subsequently be changed.

According to IAS 39, the fair value option is only applied when the following conditions are met:

- the application of the fair value option reduces or eliminates an accounting mismatch that would otherwise arise: or
- the financial assets are part of a portfolio of financial instruments which is risk managed and reported to senior management on a fair value basis; or
- the financial assets consist of debt hosts and embedded derivatives that must be separated.

The Bank's financial assets at fair value through profit or loss upon initial recognition consist of units in a money market fund. Gains and losses arising from changes in fair value are included directly in profit or loss and are reported as 'Net trading (losses)/gains'. Interest income on financial assets at fair value through profit or loss is included in 'Net interest income'.

#### 1.3 Financial assets - continued

#### Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market, other than:

- (a) those that the Bank intends to sell immediately or in the short term, which are classified as held-for-trading, and those that the entity upon initial recognition designates as at fair value through profit or loss;
- (b) those that the Bank upon initial recognition designates as available-for-sale; or
- (c) those for which the holder may not recover substantially all of their initial investment, other than because of credit deterioration.

Loans and receivables arise when the Bank provides money or services directly to a debtor with no intention of trading the asset. They are included in current assets except for maturities greater than twelve months after the end of the reporting period. The latter are classified as non-current assets. Loans and receivables mainly consist of balances held with the Central Bank of Malta and other credit institutions, loans and advances to customers, and any income accruing on each of these assets.

Loans and receivables are initially recognised at fair value — which is the cash consideration to originate or purchase the loan including any transaction costs — and measured subsequently at amortised cost using the effective interest rate method. Amortised cost is the initial measurement amount adjusted for the amortisation of any difference between the initial and maturity amounts using the effective interest method. Interest on loans and receivables is included in profit or loss and is reported as 'Interest and similar income'.

In the case of an impairment, the impairment loss is reported as a deduction from carrying value of the loan and receivable and recognised in profit or loss as 'Impairment losses'.

#### Available-for-sale financial assets

Available-for-sale investments are financial assets that consist of local government bonds and foreign debt securities which are intended to be held for an indefinite period of time, which may be sold in response to needs for liquidity or changes in interest rates, exchange rates or that are not classified as loans and receivables, held-to-maturity investments or financial assets at fair value through profit or loss. They are included in non-current assets unless the asset matures or management intends to dispose of it within twelve months of the end of the reporting period.

Available-for-sale financial assets are initially recognised at fair value, which is the cash consideration including any transaction costs, and measured subsequently at fair value with gains and losses (in case of monetary assets) being recognised in other comprehensive income, except for impairment losses and foreign exchange gains and losses, until the financial asset is derecognised. If an available-for-sale financial asset is determined to be impaired, the cumulative gain or loss previously recognised in other comprehensive income is reclassified to profit or loss. Interest income on available-for-sale assets is calculated using the effective interest method, and is recognised in profit or loss as are foreign currency gains and losses on monetary assets classified as available-for-sale. Changes in the fair value of monetary securities denominated in foreign currency classified as available-for-sale are analysed between translation differences resulting from changes in the amortised cost of the security and other changes in the carrying amount of the security.

#### 1.3 Financial assets - continued

Translation differences related to changes in amortised cost are recognised in profit or loss, and other changes in carrying amount are recognised in other comprehensive income. The fair values of quoted investments are based on current bid prices.

#### 1.4 Impairment of financial assets

Assets carried at amortised cost

The Bank assesses at the end of each reporting period whether there is objective evidence that a financial asset or group of financial assets is impaired. A financial asset or a group of financial assets is impaired and impairment losses are incurred only if there is objective evidence of impairment as a result of one or more events that occurred after the initial recognition of the asset (a 'loss event') and that loss event (or events) has an impact on the estimated future cash flows of the financial asset or group of financial assets that can be reliably estimated.

The criteria that the Bank uses to determine that there is objective evidence of an impairment loss include:

- (a) significant financial difficulty of the issuer or obligor;
- (b) a breach of contract, such as a default or delinquency in interest or principal payments;
- (c) the lender, for economic or legal reasons relating to the borrower's financial difficulty, granting to the borrower a concession that the lender would not otherwise consider;
- (d) it becomes probable that the borrower will enter bankruptcy or other financial reorganisation; or
- (e) observable data exists indicating that there is a measurable decrease in the estimated future cash flows from a portfolio of financial assets since the initial recognition of those assets, although the decrease cannot yet be identified with the individual financial assets in the portfolio. Such data includes:
  - (i) adverse changes in the payment status of borrowers in the portfolio as a whole; and
  - (ii) national or local economic conditions that correlate with defaults on the assets in the portfolio.

The Bank does not hold assets that are not individually significant. Therefore, the Bank first assesses whether objective evidence of impairment exists individually for all financial assets carried at amortised cost. If the Bank determines that no objective evidence of impairment exists it includes the asset in a group of financial assets with similar credit risk characteristics and collectively assesses them for impairment. Assets that are individually assessed for impairment and for which an impairment loss is or continues to be recognised are not included in a collective assessment of impairment.

The amount of the loss is measured as the difference between the asset's carrying amount and the present value of estimated future cash flows (excluding future credit losses that have not been incurred) discounted at the financial asset's original effective interest rate. The carrying amount of the asset is reduced through the use of an allowance account and the amount of the loss is recognised in profit or loss. If a loan has a variable interest rate, the discount rate for measuring any impairment loss is the current effective interest rate determined under the contract.

The calculation of the present value of the estimated future cash flows of a collateralised financial asset reflects the cash flows that may result from foreclosure less costs for obtaining and selling the collateral, whether or not foreclosure is probable.

#### 1.4 Impairment of financial assets - continued

Assets carried at amortised cost - continued

For the purpose of a collective evaluation of impairment, financial assets are grouped on the basis of similar credit risk characteristics. Those characteristics are relevant to the estimation of future cash flows for groups of such assets by being indicative of the debtors' ability to pay all amounts due according to the contractual terms of the assets being evaluated.

Future cash flows in a group of financial assets that are collectively evaluated for impairment are estimated on the basis of the contractual cash flows of the assets in the Bank and historical loss experience for assets of peer groups with credit risk characteristics similar to those in the Bank since the Bank does not have specific loss experiences. Historical loss experience is adjusted on the basis of current observable data to reflect the effects of current conditions that did not affect the period on which the historical loss experience is based and to remove the effects of conditions in the historical period that do not currently exist.

If, in a subsequent period, the amount of the impairment loss decreases and the decrease can be related objectively to an event occurring after the impairment was recognised (such as an improvement in the debtor's credit rating), the previously recognised impairment loss is reversed by adjusting the allowance account. The amount of the reversal is recognised in profit or loss.

Assets classified as available-for-sale

The Bank assesses at the end of each reporting period whether there is objective evidence that a financial asset or a group of financial assets is impaired.

If any such evidence exists for available-for-sale financial assets, the cumulative loss – measured as the difference between amortised cost and the current fair value, less any impairment loss on that financial asset previously recognised in profit or loss – is removed from equity and recognised in profit or loss. If, in a subsequent period, the fair value of a debt instrument classified as available-for-sale increases and the increase can be objectively related to an event occurring after the impairment loss was recognised in profit or loss, the impairment loss is reversed through profit or loss.

#### 1.5 Offsetting financial instruments

Financial assets and liabilities are offset and the net amount is reported in the statement of financial position when there is a legally enforceable right to offset the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously.

#### 1.6 Derivative financial instruments

Derivative financial instruments, including currency forwards and swaps, are initially recognised at fair value on the date on which a derivative contract is entered into, and are subsequently remeasured at their fair value. Fair values for currency forwards are determined using forward exchange market rates at the end of the reporting period. Discounting techniques, reflecting the fact that the respective exchange or settlement will not occur until a future date, are used when the time value of money has a significant effect on the fair valuation of these instruments.

Changes in the fair value of any derivative instrument that does not qualify for hedge accounting are recognised immediately in profit or loss.

#### 1.7 Intangible assets

Acquired computer software licences are capitalised on the basis of the costs incurred to acquire and bring to use specific software. These costs are amortised over their estimated useful lives of five years. Costs associated with maintaining computer software programme are recognised as an expense as incurred.

Development costs that are directly attributable to the design and testing of identifiable and unique software products controlled by the Bank are recognised as intangible assets when the following criteria are met:

- it is technically feasible to complete the software product so that it will be available for use;
- management intends to complete the software product and use it;
- there is an ability to use the software product;
- it can be demonstrated how the software product will generate probable future economic benefits;
- adequate technical, financial and other resources to complete the development and to use the software product are available; and
- the expenditure attributable to the software product during its development can be reliably measured.

At the end of each reporting period, intangible assets are reviewed for indications of impairment or changes in estimated future economic benefits. If such indications exist, the intangible assets are analysed to assess whether their carrying amount is fully recoverable (Note 1.9).

## 1.8 Property, plant and equipment

All property, plant and equipment is stated at historical cost less depreciation. Historical cost includes expenditure that is directly attributable to the acquisition of the items.

Subsequent costs are included in the asset's carrying amount or are recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Bank and the cost of the item can be measured reliably. The carrying amount of the replaced part is derecognised. All other repairs and maintenance are charged to profit or loss during the financial period in which they are incurred.

Depreciation is calculated using the straight-line method to allocate the cost of the assets to their residual values over their estimated useful lives, as follows:

	%
Leasehold improvements	20
Furniture and fittings	20
Computer hardware	20
Office equipment	33

The assets' residual values and useful lives are reviewed, and adjusted if appropriate, at the end of each reporting period. An asset's carrying amount is written down immediately to its recoverable amount if the asset's carrying amount is greater than its estimated recoverable amount (Note 1.9).

Gains and losses on disposals are determined by comparing the proceeds with the carrying amount and are recognised in profit or loss.

#### 1.9 Impairment of non-financial assets

Assets that are subject to amortisation are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An impairment loss is recognised for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use. For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash inflows (cash-generating units). The impairment test can also be performed on a single asset when the fair value less cost to sell or the value in use can be determined reliably.

#### 1.10 Current and deferred tax

The tax expense for the period comprises current and deferred tax. Tax is recognised in profit or loss, except to the extent that it relates to items recognised in other comprehensive income or directly in equity. In this case, the tax is also recognised in other comprehensive income or directly in equity, respectively.

The current income tax charge is calculated on the basis of the tax laws enacted or substantively enacted at the end of the reporting period.

Deferred tax is recognised, using the liability method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the financial statements. Deferred tax is not accounted for if it arises from initial recognition of an asset or liability in a transaction other than a business combination that at the time of the transaction affects neither accounting nor taxable profit or loss. Deferred tax is determined using tax rates (and laws) that have been enacted or substantively enacted by the end of the reporting period and are expected to apply when the related deferred tax asset is realised or the deferred tax liability is settled.

Deferred tax assets are recognised only to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilised.

#### 1.11 Share capital

Ordinary shares are classified as equity. Incremental costs directly attributable to the issue of new shares are shown in equity as a deduction, net of tax, from the proceeds.

#### 1.12 Financial liabilities

The Bank recognises a financial liability on its statement of financial position when it becomes a party to the contractual provisions of the instrument. The Bank's financial liabilities are composed of financial liabilities at fair value through profit or loss (classified as 'Derivative financial instruments) and financial liabilities which are not at fair value through profit or loss (classified as 'Other liabilities') under IAS 39. Derivative financial instruments are initially recognised at fair value on the date a derivative contract is entered into and are subsequently re-measured at their fair value. Financial liabilities not at fair value through profit or loss are recognised initially at fair value, being the fair value of consideration received, net of transaction costs that are directly attributable to the acquisition or the issue of the financial liability, these liabilities are subsequently measured at amortised cost. The Bank derecognises a financial liability from its statement of financial position when the obligation specified in the contract or arrangement is discharged, is cancelled or expires.

#### 1.12 Financial liabilities - continued

Financial liabilities measured at amortised cost comprise principally amounts owed to banks, amounts to customers, trade and other payables (Note 1.13) together with other liabilities.

Derivatives are categorised as financial liabilities classified as held for trading. Gains and losses arising from changes in fair value of financial liabilities classified held for trading are included directly in profit or loss and are reported as 'Net trading (losses)/gains'. Interest expense on financial liabilities held for trading is included in 'Net interest income'.

#### 1.13 Trade and other payables

Trade payables comprise obligations to pay for goods or services that have been acquired in the ordinary course of business from suppliers. Accounts payable are classified as current liabilities if payment is due within one year or less (or in the normal operating cycle of the business if longer). If not, they are presented as non-current liabilities.

Trade and other payables are recognised initially at fair value and subsequently measured at amortised cost using the effective interest method.

#### 1.14 Off-balance sheet instruments

Where the Bank undertakes to make a payment on behalf of its customers for guarantees issued such as for performance bonds or as irrevocable letters of credit for which an obligation to make a payment has not arisen at the reporting date, those are included in these financial statements as contingent liabilities.

Other contingent liabilities primarily include revocable letters of credit such as shipping guarantees.

The Bank may, in the normal course of business, receive legal claims against it. Where appropriate the Bank recognises a provision for liabilities when it is probable that an outflow of economic resources embodying economic benefits will be required and for which a reliable estimate can be made of the obligation. As at the end of the reporting period, there were no legal claims against the Bank.

Where the Bank has confirmed its intention to provide funds to a customer or on behalf of a customer in the form of loans, overdrafts, future guarantees whether cancellable or not or letters of credit and the Bank has not made payments at the end of the reporting period, those instruments are included in these financial statements as commitments.

#### 1.15 Interest income and expense

Interest income and expense for all interest-bearing financial instruments are recognised within 'Interest income' and 'Interest expense' in profit or loss using the effective interest method.

The effective interest method is a method of calculating the amortised cost of a financial asset or a financial liability and of allocating the interest income or interest expense over the relevant period. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the net carrying amount of the financial asset or financial liability. When calculating the effective interest rate, the Bank estimates cash flows considering all contractual terms of the financial instrument (for example, prepayment options) but does not consider future credit losses.

#### 1.15 Interest income and expense - continued

The calculation includes all fees and points paid or received between parties to the contract that are an integral part of the effective interest rate, transaction costs and all other premiums or discounts.

Once a financial asset or a group of similar financial assets has been written down as a result of an impairment loss, interest income is recognised using the rate of interest used to discount the future cash flows for the purpose of measuring the impairment loss.

#### 1.16 Fee and commission income and expense

Fees and commissions are generally recognised on an accrual basis when the service has been provided. Loan origination fees received by the Bank for loans which are probable of being drawn down, are an integral part of generating an involvement with the resulting financial instrument and, together with the related direct costs, are deferred and recognised as an adjustment to the effective interest rate on the loan using the effective interest method. Commissions and fees arising from negotiating a transaction are recognised on completion of the underlying transaction.

#### 1.17 Employee benefits

Funded defined contribution plan

The Bank operates a post-employment scheme, which consists of a defined contribution pension plan. A defined contribution plan is a pension plan under which the Bank pays fixed contributions into a separate entity. The Bank has no legal or constructive obligations to pay further contributions if the fund does not hold sufficient assets to pay all employees the benefits relating to employee service in the current and prior periods.

Expenses relating to defined contribution plans are recognised as an expense in profit or loss, within administrative expenses.

## 1.18 Leases

The Bank is the lessee

Leases in which a significant portion of the risks and rewards of ownership are retained by the lessor are classified as operating leases. Payments made under operating leases (net of any incentives received from the lessor) are charged to profit or loss on a straight-line basis over the period of the lease.

# 1.19 Cash and cash equivalents

Cash and cash equivalents are carried in the statement of financial position at face value. Cash and cash equivalents comprise balances with less than three months' maturity from the date of acquisition, including cash in hand, deposits held at call with banks and other short-term highly liquid investments with original maturities of three months or less.

#### 1.20 Dividend distribution

Dividend distribution to the Bank's shareholders is recognised as a liability in the Bank's financial statements in the period in which the dividends are approved by the Bank's shareholders.

#### 2. Financial risk management

#### 2.1 Financial risk factors

The Bank's activities expose it to a variety of financial risks and these activities involve the analysis, evaluation, acceptance and management of some degree of risk or combination of risks. The Bank's aim is to achieve an appropriate balance between risk and return and minimise potential adverse effects on the entity's financial performance.

The Board of directors oversees credit, market, funding and liquidity, operational and strategic business risks. The Bank has developed an integrated risk management framework to identify, assess, manage and report risks and risk adjusted returns.

The Bank's risk management policies are designed to identify and analyse risks, to set appropriate risk limits and controls, and to monitor the risks and adherence to limits by means of reliable and up-to-date information systems. The Board is responsible for the overall effectiveness of the risk management function, which function is however carried out by all the members of the Bank's management.

The Bank's treasury function is responsible for managing assets, liabilities and the overall financial position and is also responsible for the management of funding and liquidity risks. The Bank's risk oversight function has the overall responsibility for the development of the entity's risk strategy and the implementation of risk principles, framework, policies and related limits.

#### (a) Credit risk

The Bank takes on exposure to credit risk, which is the risk that a counterparty will cause a financial loss for the Bank by failing to discharge an obligation. Credit risk is the most important risk for the Bank's business; accordingly management carefully manages its exposure to this risk. Credit exposures arise principally through the Bank's participation in trade financing transactions, through the Bank's transactions with correspondent banks, and through its investments in debt securities and other exposures arising from its investing activities.

#### 2.1 Financial risk factors - continued

#### a) Credit risk - continued

The Bank's principal credit risk exposures relating to on-balance sheet financial assets analysed by IAS 39 categorisation and off-balance sheet instruments, reflecting the maximum exposure to credit risk before collateral held or other credit enhancements, are as follows:

Credit risk exposures relating to on-balance sheet assets:	2016 US\$	2015 US\$
Financial assets at fair value through profit or loss: Investment in units in a money market fund (Note 5)	11,609,537	2,725,250
Financial assets classified as available-for-sale: Debt securities (Note 6)	26,292,206	46,036,597
Loans and receivables: Balances with Central Bank of Malta (Note 4) Loans and advances to banks (Note 7) Loans and advances to customers (Note 8) Accrued interest income and receivables (Note 12)	3,868,238 20,679,444 89,031,527 1,948,860	676,531 58,180,981 82,186,100 2,560,258
	153,429,812	192,365,717
Credit risk exposures relating to off-balance sheet instruments:		
Commitments	5,524,573	2,185,714

The exposures set out in the preceding table are based on carrying amounts as reported in the statement of financial position. The table represents a worst case scenario of credit risk exposure to the Bank at 31 December 2016 and 2015, without taking account of any collateral held or any other credit enhancements attached.

In order to manage its principal risk exposures arising from its financial assets, primarily its loans and advances to customers, the Bank compiles and updates due diligence reports in respect of these financial assets, in most circumstances referring to external reviews of the primary borrowers and the respective assignees of export receivables carried out by agencies such as Dun and Bradstreet or their equivalents.

The creditworthiness of counterparties or customers is formally evaluated and appropriate exposure limits are established. Credit review procedures are designed to identify at an early stage exposures which require more detailed monitoring and review. Exposure to credit risk is managed through regular analysis of the ability of counterparties and potential counterparties to meet interest and capital repayment obligations and by changing the exposure limits where deemed appropriate. The Bank manages adherence to limits by reference to reporting mechanisms covering exposures and controls concentrations of risk wherever they are identified.

#### 2.1 Financial risk factors - continued

#### (a) Credit risk - continued

The geographical concentration of the Bank's financial assets as at the end of the reporting period is analysed below. For the purposes of this table, the Bank has allocated exposures to regions based on the country of domicile of the respective counterparties or customers.

	Latin America	Maita	Other EU countries	Rest of world	Total
	US\$	US\$	US\$	US\$	US\$
As at 31 December 2016					
Balances with Central Bank of Malta Financial assets designated at	-	3,868,238	-	-	3,868,238
fair value through profit or loss Financial assets classified as	-	11,609,537	-	-	11,609,537
available-for-sale	4,136,347	3,663,309	10,463,690	8,028,860	26,292,206
Loans and advances to banks	-	2,719,998	11,413,466	6,545,980	20,679,444
Loans and advances to customers	39,667,694	355,335	15,678,648	33,329,850	89,031,527
Accrued income and other assets	400,467	862,626	295,659	390,108	1,948,860
	44,204,508	23,079,043	37,851,463	48,294,798	153,429,812
As at 31 December 2015					
Balances with Central Bank of Malta Financial assets designated at	-	676,531	-	-	676,531
fair value through profit or loss Financial assets classified as	-	2,725,250	-	-	2,725,250
available-for-sale	5,347,510	21,742,753	13,837,784	5,108,550	46,036,597
Loans and advances to banks	-	14,506,080	26,776,795	16,898,106	58,180,981
Loans and advances to customers	37,550,247	-	12,829,452	31,806,401	82,186,100
Accrued income and other assets	806,041	872,509	456,908	424,800	2,560,258
	43,703,798	40,523,123	53,900,939	54,237,857	192,365,717

#### Loans and advances to customers

Loans and advances to customers are analysed by industry concentration as follows:

	2016	2015
	US\$	US\$
Wholesale trade of commodity products	18,146,825	28,407,765
Manufactured/processed commodity products	19,958,089	23,653,088
Agriculture, forestry and fishing	6,624,011	14,757,247
Mining	40,354,602	4,000,000
Transport	3,948,000	11,368,000
	89,031,527	82,186,100

As outlined previously, the Bank monitors these exposures on an individual basis throughout the different stages of the cycle from approval upon origination until maturity. The Bank focuses on the compilation, together with ongoing and event-driven updating of due diligence analyses taking cognisance of actual account developments, repayment history, ability to meet commitments and collateral measurement.

#### 2.1 Financial risk factors - continued

#### (a) Credit risk - continued

The Bank's approach when granting credit facilities is based on the customer's capacity to repay rather than placing primary reliance on credit risk mitigants. Notwithstanding, as part of the Bank's credit risk mitigation techniques, the Bank holds collateral against loans and advances to customers, which nature and level generally depends on the amount of the exposure, the type of facility provided, the term of the facility and the level of credit risk involved.

The following table presents the Bank's loans and advances to customers by level of collateral:

Uncollateralised	47,186,911 89,031,527	6,925,593 82,186,100
Loans and advances to customers Fully collateralised Uncollateralised	41,844,616	75,260,507
	2016 US\$	2015 US\$

The Bank is exposed to a significant concentration of credit risk with respect to its loans and advances to customers as they are due from a limited number of customers. As at 31 December 2016, loans and advances to customers amounting to U\$\$60,995,593 (2015: U\$\$67,221,656) of sixteen borrowers (2015: twenty borrowers) were deemed to be large exposures for regulatory reporting purposes, prior to any eligible exemptions, in accordance with the requirements of Part Four of the Capital Requirements Regulations (CRR), Large Exposures. These borrowers represent 68.51% (2015: 81.79%) of the Bank's loans and advances to customers. As at 31 December 2016 and 2015, no loans and advances to customers were deemed to be prohibited large exposures in terms of the CRR.

As at 31 December 2016, loans and advances to customers were deemed to be fully performing with the exception of assets amounting to US\$5,074,902 (2015: US\$5,712,097) which were past due but not impaired and assets amounting to US\$1,179,217 (2015: nil) which were past due by more than six months and impaired. A financial asset is past due when a counterparty has failed to make a payment when contractually due. The past due amounts referred to above were past due by the following:

	One month – three months	Three months – six months	Six months and more	Total	
	US\$	US\$	US\$	US\$	
2016	1,504,364	3,139,537	1,610,218	6,254,119	
2015	1.451.082	261.015	4.000.000	5.712.097	

During 2016, the Bank has written off the carrying amount of a loan relating to a single borrower amounting to US\$3,201,188 due to fraudulent action committed by the borrower. In 2015, the Bank had written off the carrying amount of a loan relating to a single borrower amounting to US\$691,232 due to bankruptcy. In 2015, the Bank has recovered US\$363,519 in relation to amounts written off in previous years.

There are instances where the contractual terms of a loan may be modified, due to for example, changing market conditions and other factors not related to the credit quality of a customer. Where however, the modifications to contractual terms relate to a customer's financial difficulties, this is referred to as forbearance. Loan forbearance is undertaken by the Bank very selectively and is only granted in situations where the Bank assesses that the customer has the ability to meet the revised contractual terms. As part of its forbearance measures, the Bank may extend payment terms, reduce interest or principal repayments, and defer foreclosure of collateral.

#### 2.1 Financial risk factors - continued

#### (a) Credit risk - continued

Forbearance is objective evidence of impairment and a forborne loan is deemed to be impaired when there has been a change in contractual cash flows as a result of a concession which the Bank would otherwise not consider, and it is probable that without the concession, the customer would be unable to meet the original contractual payment obligations in full. Forborne loans are not classified as impaired where the contractual cash flows arising from the forbearance measures are expected to be collected in full.

When a loan is restructured as part of a forbearance strategy and the restructuring results in a derecognition of the existing loan, the new loan is considered forborne. A loan that is renegotiated is derecognised if the existing agreement is cancelled and a new agreement made on substantially different terms, or if the terms of an existing agreement are modified, such that the renegotiated loan is substantially a different financial instrument.

As at 31 December 2016, the Bank classifies exposure balances amounting to US\$15,672,216 (2015: US\$3,643,890) of seven borrowers (2015: one borrower) as forborne, albeit without derecognition. This represents an increase of US\$12,028,326 (2015: nil) in loans for which forbearance measures have been extended during the period. There were no repayments of forborne loans during 2016 or 2015. These exposures represent 17.42% (2015: 4.43%) of the Bank's loans and advances to customers. As at the reporting date, specific impairment allowance amounting to US\$563,947 (2015: nil) are being held against one of these exposures. Accordingly, as at the reporting date, a forborne exposure amounting to US\$1,783,226 (2015: nil) is classified as past due and impaired, exposures amounting to US\$2,226,343 (2015: nil) are classified as past due but not impaired, and exposures amounting to US\$11,662,646 (2015: US\$3,643,890) are performing to terms. Interest income recognised during the year in respect of forborne loans amounts to US\$1,876,596 (2015: US\$232,625). Forborne loans are analysed by geographical location as follows:

	15,672,216 ————————————————————————————————————	3,643,890
Rest of world	2,342,904	3,643,8 <b>9</b> 0
Other EU countries	4,699,871	-
Latin America	8,629,441	-
As at 31 December	·	·
	US\$	US\$
	2016	2015

Loans and advances to banks and other financial assets

In the normal course of business, the Bank places funds, carries out transactions and enters into forward foreign exchange contracts or currency swaps with specific high quality locally listed banks and international banks having a very high credit rating, subject to the application of a limit framework.

As part of its treasury management activities the Bank invests in debt instruments issued by local and foreign governments, listed debt securities issued by foreign corporates generally with high credit quality and strong financial background as well as in rated sub-investment grade debt instruments. These transactions are monitored through the practical use of exposure limits. All such investments are listed on the Malta Stock Exchange, which is currently the only locally-based Recognised Investment Exchange (RIE) in Malta and other major stock exchanges. External ratings such as Standard & Poor's rating or their equivalents are used for monitoring these credit risk exposures.

# 2.1 Financial risk factors - continued

#### (a) Credit risk - continued

The Bank also places liquidity in excess of operational requirements in an unrated money market fund, which seeks to invest predominantly in term deposits with Prime European Banks and Malta Government Treasury Bills.

The following tables present an analysis of the Bank's financial assets by rating agency based on Fitch ratings or their equivalent.

	Balances with Central Bank of Malta	Financial assets classified as available-for-sale	Loans and advances to banks
0010	US\$	US\$	US\$
<b>2016</b> AAA		1 000 400	4 004 400
AAA		1,309,469 1,637,205	1,391,402 1,739,920
A+	- -	1,443,925	1,700,020
A	_	1,063,265	
A-	3,868,238	4,294,940	6,559,585
BBB+	· ·	891,317	610,198
BBB	-	1,973,552	-
BBB-	-	1,735,933	808,657
BB+	-	955,295	4,855,539
BB BB-	-	1,594,486	-
B+	-	1,501,638 2,161,453	1,614,838
В	-	2,775,097	840,000
B-	<u>-</u>	1,979,196	040,000
CCC+	-	529,185	-
Unrated	•	446,250	2,259,305
Total	3,868,238	26,292,206	20,679,444
2015			
AAA	_	356,234	_
AA	<u> </u>	1,112,120	_
A+	_	948,580	_
A	_	848,419	19,544,906
A-	-	845,927	10,011,000
BBB+	676,531	22,656,072	16,632,177
BBB	-	2,559,773	-
BBB-	-	3,507,444	11,809,156
BB+	-	3,420,069	
BB	-	1,115,004	•
BB-	<del>'</del>	974,426	5,813,328
B+	-	2,396,617	-
В	-	3,253,525	-
B-	-	1,748,437	-
CCC+	-	293,950	-
Unrated	-	-	4,381,414
Total	676,531	46,036,597	58,180,981

#### 2.1 Financial risk factors - continued

#### (a) Credit risk - continued

Loans and advances to customers, amounts receivable from the Depositor Compensation Scheme and financial assets held at fair value through profit or loss have been excluded from the above analysis since they are unrated.

#### (b) Market risk

The Bank takes on exposure to market risk, which is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risks arise from open positions in interest rate and currency products, all of which are exposed to general and specific market movements and changes in the level of volatility of market rates or prices such as interest rates, credit spreads, foreign exchange rates and equity prices.

#### Foreign exchange risk

The Bank takes on exposure to the effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows. Foreign exchange risk is the risk to earnings and value caused by a change in foreign exchange rates. Foreign exchange risk arises when financial assets or liabilities are denominated in currencies which are different from the Bank's functional currency.

The Bank funds its growth through the acceptance of deposits predominantly denominated in euro and through the credit operations (Refinancing Operations) of the Central Bank of Malta within the Eurosystem's credit operations framework.

The Bank manages its currency risk on an ongoing basis by ensuring that foreign currency liabilities are utilised to fund assets denominated in the same foreign currency thereby matching asset and liability positions as much as is practicable. When it is not possible to match the asset and liability currency positions, the Bank hedges its open foreign exchange exposures arising from customer deposits by entering into forward foreign exchange contracts or currency swaps with terms which match those of the hedged items.

#### 2.1 Financial risk factors - continued

# (b) Market risk - continued

Foreign exchange risk - continued

The following tables summarise the Bank's exposure to foreign currency risk at 31 December. Included in the tables are the Bank's financial instruments at carrying amounts, categorised by currency.

	US\$	GBP US\$	Euro US\$	Total US\$
As at 31 December 2016	,	·	·	
Financial assets Balances with Central Bank of Malta Financial assets designated at	-	-	3,868,238	3,868,238
fair value through profit and loss Financial assets classified	-	-	11,609,537	11,609,537
as available-for-sale Loans and advances to banks Loans and advances to customers Accrued interest income and other	11,715,857 14,553,200 84,410,565	635,762 911,405	13,940,587 5,214,839 4,620,962	26,292,206 20,679,444 89,031,527
assets	909,639	8,356	1,030,865	1,948,860
Total financial assets	111,589,261	1,555,523	40,285,028	153,429,812
Financial liabilities Amounts owed to customers Amounts owed to banks Accrued interest payable and other	26,400,634	185,310	82,856,109 3,164,700	120,670,756 3,350,010
liabilities	169,899	57,213	879,131	1,106,243
Total financial liabilities	26,570,533	11,656,536	86,899,940	125,127,009
Net on-balance sheet position	85,018,728	(10,101,013)	(46,614,912)	
Off-balance sheet net notional position	<u>-</u>	9,883,200	43,828,966	
Net currency exposure	-	(217,813)	(2,785,946)	

#### 2.1 Financial risk factors - continued

## (b) Market risk - continued

Foreign exchange risk - continued

	US\$	GBP US\$	Euro US\$	Total US\$
As at 31 December 2015	004	000	σοφ	004
Financial assets Balances with Central Bank of Malta Financial assets designated at fair value through profit and loss	-	-	676,531 2,725,250	676,531 2,725,250
Financial assets classified as available-for-sale Loans and advances to banks Loans and advances to customers Accrued interest income and other assets	10,152,723 32,531,199 78,465,097 1,393,359	1,236,700 339,190 - 31,466	34,647,174 25,310,592 3,721,003 1,135,433	46,036,597 58,180,981 82,186,100 2,560,258
Total financial assets	122,542,378	1,607,356	68,215,983	192,365,717
Financial liabilities Amounts owed to customers Amounts owed to banks Accrued interest payable and other liabilities	46,659,625 3,002,166 213,666	13,732,737 - 82,014	83,277,939 16,461,041 721,442	143,670,301 19,463,207 1,017,122
Total financial liabilities	49,875,457	13,814,751	100,460,422	164,150,630
Net on-balance sheet position	72,666,921	(12,207,395)	(32,244,439)	
Off-balance sheet net notional position		12,156,500	31,566,145	
Net currency exposure		(50,895)	(678,294)	•

Under the scenario that the US dollar appreciates by 10% against the euro and the GBP, profit before tax for the year would have been US\$300,376 (2015: US\$72,919) higher. Conversely, should the US dollar depreciate against the euro and the GBP by 10%, profit before tax for the year would have been US\$300,376 (2015: US\$72,919) lower.

#### Interest rate risk

Cash flow interest rate risk is the risk that the future cash flows of a financial instrument will fluctuate because of changes in market interest rates. Fair value interest rate risk is the risk that the value of a financial instrument will fluctuate because of changes in market interest rates.

# 2.1 Financial risk factors - continued

# (b) Market risk - continued

Interest rate risk - continued

The exposure to cash flow and fair value interest rate risk as at 31 December is shown below:

	Floating Rates US\$	Fixed Rates US\$	Total US\$
At 31 December 2016 Interest-bearing assets Financial assets designated at FVTPL:			
Units in a money market fund Financial assets classified as available-for-sale:	11,609,537	-	11,609,537
Debt securities Loans and receivables:	2,135,012	24,157,194	26,292,206
Balances with Central Bank of Malta Loans and advances to banks	3,868,238 6,559,585	- 14,119,859	3,868,238 20,679,444
Loans and advances to customers	42,318,126	46,713,401	89,031,527
	66,490,498	84,990,454	151,480,952
Interest-bearing liabilities Amounts owed to customers	_	120,670,756	120,670,756
Amounts owed to banks	3,164,700	185,310	3,350,010
	3,164,700	120,856,066	124,020,766
Net exposure	63,325,798	(35,865,612)	27,460,186
At 31 December 2015			
Interest-bearing assets Financial assets designated at FVTPL:			
Units in a money market fund Financial assets classified as available-for-sale:	2,725,250	-	2,725,250
Debt securities Loans and receivables:	1,677,500	44,359,097	46,036,597
Balances with Central Bank of Malta	676,531	-	676,531
Loans and advances to banks Loans and advances to customers	49,441,678 29,792,991	8,739,303 52,393,109	58,180,981 82,186,100
	84,313,950	105,491,509	189,805,459
Interest-bearing liabilities			
Amounts owed to customers Amounts owed to banks	14,171,300	143,670,301 5,291,907	143,670,301 19,463,207
	14,171,300	148,962,208	163,133,508
Net exposure	70,142,650	(43,470,699)	26,671,951

#### 2.1 Financial risk factors - continued

(b) Market risk - continued

Interest rate risk - continued

Financial instruments issued at fixed rates potentially expose the Bank to fair value interest rate risk. Loans and advances to customers, loans and advances to banks and amounts owed to customers are measured at amortised cost and are therefore not subject to fair value interest rate risk.

The Bank's instruments that are fair valued and which are subject to interest rate risk comprise the Bank's investments in a money market fund which are fair valued through profit or loss (Note 5) and debt securities classified as available-for-sale (Note 6). A significant proportion of the Bank's investments in debt securities are subject to fixed interest rates. The Bank manages this risk by using sensitivity analysis using modified duration, which measures the potential loss in market value arising from a 100 basis-point upward parallel shift in yields. The estimated impact of an immediate 100 basis point increase in yields as at 31 December 2016 on the fair valuation of its investments carried at fair value (debt securities and units in the money market fund) amounts to US\$1,174,779 (2015: US\$3,120,228). The fair value of loans and receivables measured at amortised cost is not expected to fluctuate considerably due to their short term nature.

As outlined above, the Bank was also exposed to cash flow interest rate risk principally in respect of certain financial assets and liabilities which were subject to floating interest rates. Financial assets and liabilities issued at variable rates expose the Bank to cash flow interest rate risk.

Taking cognisance of the nature of the Bank's financial assets and liabilities as described above, under the requirements of IFRS 7, a sensitivity analysis in respect of interest rate changes is required in relation to the Bank's net floating rate assets or liabilities.

At the end of the reporting period, if interest rates had increased by 1% (assuming a parallel shift of 100 basis points in yields) with all other variables held constant, in particular foreign currency rates, the post-tax result for the year would increase by US\$411,618 (2015: increase by US\$455,927). Taking cognisance of the current low interest rate environment, the Bank does not expect interest rate to decrease by a further 100 basis points. Accordingly, the disclosure relating to an assumed decrease in interest rates by a 100 basis points is not deemed necessary.

#### 2.1 Financial risk factors - continued

# (b) Market risk - continued

Interest rate risk - continued

The following table summarises the Bank's exposures to interest rate risk. It includes the entity's financial instruments at carrying amounts, categorised by re-pricing dates, taking cognisance of the instruments' interest rate terms. The re-pricing periods in respect of the entity's interest bearing assets and liabilities subject to fixed interest rates is equivalent to the remaining period to maturity.

As at 31 December 2016	Within one month US\$	Within three months but over one month US\$	Within one year but over three months US\$	More than one year US\$	Total US\$
Financial assets Balances with					
Central Bank of Malta Financial assets designated at	3,868,238	-	-	-	3,868,238
fair value through profit or loss Financial assets classified	11,609,537	-	-	-	11,609,537
as available-for-sale	-	527,661	1,607,351	24,157,194	26,292,206
banks Loans and advances to	11,949,763	2,305,303	6,424,378	-	20,679,444
customers	51,789,417	6,613,875	21,811,118	8,817,117	89,031,527
	79,216,955	9,446,839	29,842,847	32,974,311	151,480,952
Financial liabilities					
Amounts owed to customers Amounts owed to banks	28,637,821	25,193,358 3,164,700	30,520,977 185,310	36,318,600 -	120,670,756 3,350,010
	28,637,821	28,358,058	30,706,287	36,318,600	124,020,766
Interest rate gap	50,579,134	(18,911,219)	(863,440)	(3,344,289)	-
Cumulative gap	50,579,134	31,667,915	30,804,475	27,460,186	_

#### 2.1 Financial risk factors - continued

# (b) Market risk - continued

Interest rate risk - continued

As at 31 December 2015	Within one month US\$	Within three months but over one month US\$	Within one year but over three months US\$	More than one year US\$	Total US\$
Financial assets Balances with					
Central Bank of Malta Financial assets designated at	676,531	-	-	-	676,531
fair value through profit or loss	2,725,250	<u>.</u>	-	-	2,725,250
as available-for-sale Loans and advances to	-	-	1,677,500	44,359,097	46,036,597
banks Loans and advances to	50,911,830	707,537	6,561,614	-	58,180,981
customers	47,678,389	13,099,835	19,074,541	2,333,335	82,186,100
	101,992,000	13,807,372	27,313,655	46,692,432	189,805,459
Financial liabilities					
Amounts owed to customers Amounts owed to banks	51,101,937	21,743,230 19,463,207	29,008,833	41,816,301 -	143,670,301 19,463,207
	51,101,937	41,206,437	29,008,833	41,816,301	163,133,508
Interest rate gap	50,890,063	(27,399,065)	(1,695,178)	4,876,131	
Cumulative gap	50,890,063	23,490,998	21,795,820	26,671,951	_

# (c) Liquidity risk

Liquidity risk is the risk that the Bank is unable to meet its payment obligations associated with its financial liabilities when they fall due and to replace funds when they are withdrawn. The consequence may be the failure to meet obligations to repay depositors and fulfil commitments.

The Bank manages this risk, by maintaining a strong base of shareholders' capital considering the stages of its operations. The Bank manages its asset base with liquidity in mind, and monitors future cash flows and changes in available liquidity on a regular basis.

#### 2.1 Financial risk factors - continued

# (c) Liquidity risk - continued

The Bank holds a diversified portfolio of cash and high-quality highly-liquid securities to support payment obligations and contingent funding in a stressed market environment. The Bank's assets held for managing liquidity risk comprise:

- short term placements with other banks;
- investments in a money market fund; and
- unencumbered high quality liquid assets that are readily acceptable for repurchase agreements with central banks.

Liquidity is managed by the Bank's treasury function and the Bank's liquidity management process, includes:

- day to day funding, managed by monitoring future cash flows to ensure that requirements can be met including plans for replenishment of funds as they mature;
- maintaining a portfolio of highly marketable assets that can easily be liquidated as protection against any unforeseen interruption to cash flow;
- monitoring the liquidity ratios of the statement of financial position against internal and regulatory requirements; and
- · managing the concentration and profile of debt maturities.

Moreover, sources of liquidity are regularly reviewed by the treasury function to maintain a wide diversification by provider, product and term. Monitoring takes the form of cash flow projections for the next day, week and month respectively, as these are key periods for liquidity management.

# 2.1 Financial risk factors - continued

# (c) Liquidity risk - continued

The following table discloses financial assets and liabilities at the end of the reporting period by remaining period to maturity.

As at 31 December 2016	Within One Month US\$	Within three months but over one month US\$	Within one year but over three months US\$	More than one year US\$	No maturity US\$	Total US\$
Financial assets						
Balances with Central Bank of Malta Financial assets designated	3,164,700	-	-	-	703,538	3,868,238
at fair value through profit or loss	-	-	-	-	11,609,537	11,609,357
Financial assets classified as available-for-sale	-	-	-	26,292,206	-	26,292,206
Loans and advances to banks	11,949,763	2,305,303	6,424,378	-	-	20,679,444
Loans and advances to customers	15,999,382	28,408,784	35,806,243	8,817,117	-	89,031,526
Accrued income and other assets	226,564	165,866	286,707	440,750	828,973	1,948,860
	31,340,409	30,879,953	42,517,328	35,550,073	13,142,048	153,429,811
Financial liabilities						
Amounts owed to customers Amounts owed to banks Derivative financial	28,637,821 -	25,193,358 3,164,700	30,520,977 185,310	36,318,600 -	-	120,670,756 3,350,010
instruments Other liabilities	838,637 357,997	249,335 56,572	286,809 119,909	235,765	336,000	1,374,781 1,106,243
	29,834,455	28,663,965	31,113,005	36,554,365	336,000	126,501,790
Maturity gap	1,505,954	2,215,988	11,404,323	(1,004,292)		
Cumulative gap	1,505,954	3,721,942	15,126,265	14,121,973		

Call accounts payable on demand amounting to US\$22,978,874 at 31 December 2016 are disclosed within the 'Within one month' maturity grouping. However, in practice, these deposits are maintained with the Bank for longer periods than one month.

Financial assets classified as available for-sale amounting to US\$5,851,908 as at 31 December 2016, form part of the Bank's high quality liquid asset portfolio for liquidity coverage ratio (LCR) purposes. Accordingly, they are expected to be liquidated within one month.

Although settled on a gross basis, the amounts attributable to derivative contracts have been included above on a net basis. Gross contractual undiscounted cashflows relating to derivative transactions are included on the following page.

#### 2.1 Financial risk factors - continued

# (c) Liquidity risk - continued

As at 31 December 2015	Within one month US\$	Within three months but over one Month US\$	Within one year but over three months US\$	More than one year US\$	No maturity US\$	Total US\$
Financial assets						
Balances with Central Bank of Malta Financial assets designated	-	-	-	-	676,531	676,531
at fair value through profit or loss Financial assets classified	-	-	-	-	2,725,250	2,725,250
as available-for-sale  Loans and advances to	-	-	-	46,036,597	-	46,036,597
banks Loans and advances to	50,911,830	707,537	6,561,614	-	-	58,180,981
customers Accrued income and other	20,664,592	27,112,122	32,076,051	2,333,335	-	82,186,100
assets	605,861	150,514	484,339	650,866	668,678	2,560,258
	72,182,283	27,970,173	39,122,004	49,020,798	4,070,459	192,365,717
Financial liabilities						
Amounts owed to customers	51,101,936	21,743,230	29,008,833	41,816,302	-	143,670,301
Amounts owed to banks Derivative financial	4,092,797	15,370,410	-	-	-	19,463,207
instruments	492,848	266,470	621,004	<del></del>	-	1,380,322
Other liabilities	526,041	69,990	127,831	293,260	<u>-</u>	1,017,122
	56,213,622	37,450,100	29,757,668	42,109,562	•	165,530,952
Maturity gap	15,968,661	(9,479,927)	9,364,336	6,911,236		
Cumulative gap	15,968,661	6,488,734	15,853,070	22,764,306		
			13,033,070	22,704,000		

Call accounts payable on demand amounting to US\$42,143,809 at 31 December 2015 are disclosed within the 'Within one month' maturity grouping. However, in practice, these deposits are maintained with the Bank for longer periods than one month.

Financial assets classified as available for-sale amounting to US\$14,652,401 as at 31 December 2015, form part of the Bank's high quality liquid asset portfolio for LCR purposes. Accordingly, they are expected to be liquidated within one month.

Although settled on a gross basis, the amounts attributable to derivative contracts have been included above on a net basis. Gross contractual undiscounted cashflows relating to derivative transactions are included on the following page.

# 2.1 Financial risk factors - continued

# (c) Liquidity risk - continued

The following table analyses the Bank's principal undiscounted cash flows payable under non-derivative financial liabilities into relevant maturity groupings based on the remaining period at the end of the reporting period to the contractual maturity date.

		Within	Within			
		three	one			
	Within	months but	year but			
	one	over one	over three	More than		Carrying
	month	month	months	one year	Total	amount
	US\$	US\$	US\$	US\$	US\$	US\$
As at 31 December 2016						
Amounts owed to customers	28,665,137	25,249,930	30,640,886	36,551,348	121,107,301	120,670,756
Amounts owed to banks	-	3,164,700	188,378	-	3,353,078	3,350,010
Other liabilities	357,996	56,572	455,909	235,765	1,106,242	1,106,243
	29,023,133	28,471,202	31,285,173	36,787,113	125,566,621	125,127,009
As at 31 December 2015						
Amounts owed to customers	51,149,263	21,811,836	29,136,665	42,114,113	144,211,877	143,670,301
Amounts owed to banks	4,093,258	15,371,332	-	-	19,464,590	19,463,207
Other liabilities	526,042	69,990	127,831	293,259	1,017,122	1,017,122
	55,768,563	37,253,158	29,264,496	42,407,372	164,693,589	164,150,630

The Bank's currency derivatives are all settled on a gross basis. The following tables analyse the Bank's derivative financial instruments into relevant maturity groupings based on the remaining period at the end of the reporting period to the contractual maturity date. The amounts disclosed in the tables are the contractual undiscounted cash flows.

Contracted undiscounted cash flows			
Within three months but over one	Within one year but over three	T-4-1	
		Total	
US\$	08\$	US\$	
41,171,584	12,756,591	53,928,1 75	
(42,259,556)	(13,043,400)	(55,302,956)	
(1,087,972)	(286,809)	(1,374,781)	
	· ·	43,401,003	
(22,186,525)	(22,594,800)	(44,781,3-25)	
(759,318)	(621,004)	(1,380,322)	
	Within three months but over one month US\$ 41,171,584 (42,259,556) (1,087,972) 21,427,207 (22,186,525)	Within three months but over one months but over three month uS\$ US\$  41,171,584 (42,259,556) (13,043,400)  (1,087,972) (286,809)  21,427,207 (22,186,525) (22,594,800)	

#### 2.1 Financial risk factors - continued

# (d) Operational risk

Operational risk is the risk of direct or indirect loss arising from a wide variety of causes associated with the Bank's processes, personnel, technology and infrastructure, and from external factors other than credit, market and liquidity risks such as those arising from legal and regulatory requirements and generally accepted standards of corporate behaviour. The Bank's Board of directors is primarily responsible for the development and implementation of policies and procedures to ensure that operational risks are managed effectively. The Bank mitigates the possibility of impact risk events through the implementation of a business continuity plan, which encompasses risk mitigation achieved through back-up information security infrastructures, back-up disaster recovery sites and insurance covers over particular business risks. Such systems enable the Bank to operate on an ongoing basis and limit losses in the event of severe business disruption.

For regulatory reporting purposes, the Bank currently uses the Basic Indicator Approach to assess the operational risk capital requirements and accordingly allocates 15% of average gross operating income for a three year period in accordance with regulatory requirements. The operational risk regulatory capital requirement as at December 2016 amounted to US\$1,370,966 (2015: US\$939,980).

## 2.2 Capital risk management

The Bank's objectives when managing capital, which is a broader concept than the 'equity' as disclosed in the statement of financial position, are:

- to comply with the capital requirements set by the Malta Financial Services Authority (MFSA);
- to safeguard the Bank's ability to continue as a going concern so that it can continue to provide returns for shareholders and benefits for other stakeholders; and
- to maintain a strong capital base to support the development of its business.

Capital adequacy and the use of regulatory capital are monitored on an ongoing basis by the Bank's management, employing techniques based on the guidelines developed by the Basel Committee and the European Union Directives and Regulations, as implemented by the MFSA for supervisory purposes.

The Bank is required to maintain a ratio of total regulatory capital to risk-weighted assets ("Capital requirements ratio") above the prescribed minimum level of 8%.

The minimum capital requirements are calculated for credit, market and operational risks. During the year, the Bank utilised the Standardised Approach for credit risk, the Basic Indicator Approach for operational risk and the Basic Method for foreign exchange risk in order to calculate the Pillar 1 minimum capital requirements. For credit risk, under the standardised approach, risk weights are determined according to credit ratings provided by internationally recognised credit agencies such as Fitch or their equivalents and by using the applicable regulatory risk weights for unrated exposures. The Basic Indicator Approach requires that the Bank allocates capital for operational risk by taking 15% of the average gross income, while the Basic Method requires the Bank to allocate 8% of its overall net foreign exchange position to calculate the capital requirement for foreign exchange risk.

# 2.2 Capital risk management - continued

The following table shows the components of own funds and accordingly the basis for the calculation of the Bank's capital adequacy ratio:

	2016 US\$	2015 US\$
Common Equity Tier 1 (CET1) capital Share capital Retained earnings Fair value reserve Other reserve	22,500,000 2,855,529 377,085 14,790	16,300,000 4,302,229 2,840,101
Less: Intangible assets Transfer to Tier 2 capital in respect of unrealised gains Other deductions	(61,127) (254,319) (815,502)	(69,161) (2,002,127) (660,5 <b>1</b> 5)
CET1 capital	24,616,456	20,710,527
Tier 2 capital: Investment revaluation gains	254,319	2,002,127
Total capital / own funds	24,870,775	22,712,654

Other deductions relate to the contributions amounting to US\$815,502 (2015: US\$660,515) in favour of the Depositor Compensation Scheme as at 31 December 2016, that are not available to the Bank for unrestricted and immediate use to cover risk of losses as soon as they occur. The Depositor Compensation Scheme is excluded for the purposes of the Own Funds calculation.

# 2.3 Fair value of financial instruments

Financial instruments measured at fair value

The following table analyses financial instruments that are measured in the statement of financial position at fair value, by level of the following fair value measurement hierarchy. The different levels have been defined as follows:

- Quoted prices (unadjusted) in active markets for identical assets or liabilities (level 1).
- Inputs other than quoted prices included within level 1 that are observable for the asset or liability, either directly (that is, as prices) or indirectly (that is, derived from prices) (level 2).
- Inputs for the asset or liability that are not based on observable market data (that is, unobservable inputs) (level 3). If one or more of the significant inputs is not based on observable market data, the instrument is included in level 3. The Bank does not hold any level 3 instruments.

The following table presents the Bank's financial instruments that are measured at fair value.

	Level 1 US\$	Level 2 US\$	Total US\$
As at 31 December 2016 Assets Financial assets designated at fair value through profit or loss: Investments in money market fund	11,609,537	_	11,609,537
Financial assets classified as available-for-sale: Listed debt securities	26,292,206		26,292,206
Total financial assets at fair value	37,901,743		37,901,743
Financial liabilities held-for-trading Derivative financial liabilities	-	1,374,781	1,374,781
As at 31 December 2015 Assets Financial assets designated at fair value through profit or loss: Investments in money market fund Financial assets classified as available-for-sale: Listed debt securities	2,725,250 46,036,597	-	2,725,250 46,036,597
Total financial assets at fair value	48,761,847	-	48,761,847
Financial liabilities held-for-trading Derivative financial liabilities	-	1,380,322	1,380,322

There were no transfers between levels 1 and 2 during the year.

#### 2.3 Fair value of financial instruments - continued

#### (a) Financial instruments in Level 1

The fair value of financial instruments traded in active markets is based on quoted market prices at the end of the reporting period. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. The quoted market price used for financial assets held by the Bank is the current bid price.

Instruments included in level 1 comprise primarily debt instruments issued by the Government of Malta and listed on the Malta Stock Exchange as well as debt securities listed on other recognised investment exchanges. The Bank's level 1 instruments also include the Bank's investments in a money market fund the fair value of which is determined by the fund manager on a daily basis and which is directly derived from the observable market values of the principal underlying assets.

## (b) Financial instruments in Level 2

Fair values for the Bank's derivative contracts are determined utilising valuation techniques, involving primarily the use of discounted cash flow techniques. The fair values referred to are determined by reference to market prices or rates (forward foreign exchange rates) quoted at the end of the reporting period. The valuation techniques used are supported by observable market prices or rates since their variables include only data from observable markets. The Bank's derivative financial instruments are accordingly categorised as level 2 instruments.

# Financial instruments not measured at fair value

Loans and advances to banks and customers and amounts owed to banks and customers are carried at amortised cost in the statement of financial position. The directors consider the carrying amounts of loans and advances to customers and banks to be a reasonable estimate of their fair value principally in view of the relatively short periods to repricing or maturity from the end of the reporting periods. The fair value of fixed interest deposits and amounts owed to banks, is not deemed to be significantly different from their carrying amounts, based on discounted cash flows at current market interest rates, particularly due to the relatively short periods to maturity.

These estimates are considered level 2 fair value estimates.

# 3. Critical accounting estimates, and judgments in applying accounting policies

Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances.

In the opinion of the directors, the accounting estimates and judgments made in the course of preparing these financial statements are not difficult, subjective or complex to a degree winich would warrant their description as critical in terms of the requirements of IAS 1.

The directors believe there are no areas involving a higher degree of judgement that would have a significant effect on the amounts recognised in the financial statements; and there are no key assumptions and other key sources of estimation uncertainty relating to estimates that require directors' most difficult, subjective or complex judgments.

#### 4. Cash and balances with Central Bank of Malta

	2016 US\$	2015 US\$
Cash in hand Mandatory reserve deposits with Central Bank of Malta Other balances with Central Bank of Malta	851 703,538 3,164,700	3,336 676,531 -
	3,869,089	679,867

Mandatory reserves and other balances attract interest at floating rates.

# 5. Financial assets designated as at fair value through profit or loss

	2016 US\$	2015 US\$
Units in a money market fund	11,609,537	2,725,250

Financial assets at fair value through profit or loss at 31 December 2016 and 2015 consist of placements in the form of investments in a money market fund that mainly seeks to invest in term deposits with Prime European Banks and Malta Government Treasury bills. These financial assets have been designated as assets at fair value through profit or loss in view of the fact that they are risk managed and reported to senior management on a fair value basis.

As at 31 December 2016, units held by the Bank in the said fund with a carrying amount of US\$4,774,708 (2015: US\$2,725,250) were pledged as collateral in favour of another credit institution for the purpose of establishing a credit line.

## 6. Financial assets classified as available-for-sale

	2016 US\$	2015 US\$
Debt securities	26,292,206	46,036,597
The movement in available-for-sale investments may be summarise	d as follows:	
	2016 US\$	2015 US\$
Year ended 31 December		
At 1 January	46,036,597	52,035,103
Acquisitions	46,732,962	31,537,614
Disposals/redemptions	(67,024,392)	(34,503,826)
Amortisation	26,013	(7,824)
Foreign exchange movements	(1,085,013)	(3,534,411)
Net fair value movements	1,606,039	509,941
At 31 December	26,292,206	46,036,597

The Bank's investments consist entirely of listed securities and are analysed by issuer as follows:

	2016 US\$	2015 US\$
Local government Foreign governments Corporates	3,663,309 1,519,269 21,109,628	21,743,925 4,214,035 20,078,637
	26,292,206	46,036,597

At 31 December 2016, the Bank had pledged available-for-sale investments with a carrying amount of US\$3,663,309 (2015: US\$14,171,300) in favour of the Central Bank of Malta as security for term loans and advances in respect of the Bank's participation in the European Central Bank's open market operations, which at 31 December 2016 amounted to US\$3,164,700 (2015: US\$14,171,300).

Furthermore, the Bank had pledged as collateral available-for-sale investments with a carrying amount of US\$4,387,500 (2015: US\$1,584,330) in support of the Bank's OTC derivative transactions with counterparties.

# 7. Loans and advances to banks

	2016 US\$	2015 US\$
Repayable on call and at short notice Term loans and advances	9,718,360 10,961,084	49,788,574 8,392,407
	20,679,444	58,180,981

Loans and advances with a contractual maturity of three months or less are included in cash and cash equivalents for the purposes of the statement of cash flows (Note 29).

# 8. Loans and advances to customers

	2016 US\$	2015 US\$
Gross term loans and advances to customers Allowances for impairment	89,942,331 (910,804)	82,186,100
Net term loans and advances to customers	89,031,527	82,186,100
	2016 US\$	2015 US\$
Impairment allowances: Specific Collective	563,947 346,858	- -
	910,804	

Loans and advances to customers amounting to US\$39,328,094 (2015: US\$33,934,266) consist of participations in trade financing transactions, initiated by IIG Trade Finance LLC, a related party (Note 30). These participations are subject to fixed interest rates ranging from 4.0% to 19.0% (2015: 8.0% to 19.0%), and the weighted average interest rate as at 31 December 2016 was 9.6% (2015: 10.6%).

The Bank also directly enters into trade finance arrangements giving rise to lending and related facilities. In this respect, loans and advances to customers amounting to US\$3,874,506 (2015: US\$11,533,330) are subject to fixed interest rates ranging from 6.52% to 6.67% (2015: 6.10% to 10.5%) while US\$42,318,126 (2015: US\$29,792,911) are subject to variable interest rates ranging from 3.75% to 12.43% (2015: 5.8% to 12.1%). Discounting arrangements as at 31 December 2016 amounting to US\$3,510,801 (2015: US\$6,925,593) are subject to fixed interest rate of 6.5% (2015: 5.5% to 6.4%).

The Bank holds various forms of collateral to secure its loans and advances, including guarantees, pledges in the form of a floating charge over inventories, the assignments of receivables, as well as bills of exchange.

# 9. Property, plant and equipment

	Leasehold improvements US\$	Furniture and fittings US\$	Computer hardware US\$	Office equipment Total US\$ US\$
At 1 January 2015 Cost Accumulated depreciation	48,785 (42,794)	130,433 (80,418)	107,237 (72,954)	36,611 323,066 (34,328) (230,494)
Net book amount	5,991	50,015	34,283	2,283 92,572
Year ended 31 December 2015 Opening net book amount Additions Depreciation charge	5,991 14,007 (4,655)	50,015 67,213 (20,905)	34,283 23,231 (12,966)	2,283 92,572 2,239 106,690 (946) (39,472)
Closing net book amount	15,343	96,323	44,548	3,576 159,790
At 31 December 2015 Cost Accumulated depreciation	62,792 (47,449)	197,646 (101,323)	130,468 (85,920) 44,548	38,850 429,756 (35,274) (269,966)
Net book amount	15,343	96,323	44,046	3,576 159,790
Year ended 31 December 2016 Opening net book amount Additions Depreciation charge	15,343 - (4,463)	96,323 1,579 (24,689)	44,548 23,610 (13,139)	3,576 159,790 8,130 33,319 (2,149) (44,440)
Closing net book amount	10,880	73,213	55,019	9,557 148,669
At 31 December 2016 Cost Accumulated depreciation	62,792 (51,912)	199,225 (126,012)	154,078 (99,059)	46,980 463,075 (37,423) (314,406)
Net book amount	10,880	73,213	55,019	9,557 148,669

# 10. Intangible assets

	Computer software US\$
At 1 January 2015 Cost	074 004
Accumulated amortisation	271,001 (173,410)
Net book amount	97,591
Year ended 31 December 2015 Opening net book amount Additions Amortisation charge	97,591 23,712 (52,142)
Closing net book amount	69,161
At 31 December 2015 Cost Accumulated amortisation	294,713 (225,552)
Net book amount	69,161
Year ended 31 December 2016 Opening net book amount Additions Amortisation charge	69,161 18,202 (26,236)
Closing net book amount	61,127
At 31 December 2016 Cost Accumulated amortisation Net book amount	312,915 (251,788) <b>61,127</b>

#### 11. **Deferred tax**

Deferred tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and when the deferred income taxes relate to the same fiscal authority.

Deferred taxes are calculated on temporary differences under the liability method and are measured at the tax rates that are expected to apply to the period when the asset is realised or the liability is settled based on tax rates (and tax laws) that have been enacted by the end of the reporting period. The principal tax rate used is 35% (2015: 35%).

The movement in deferred tax liabilities/(assets) during the year is as follows:

	2016 US\$	2015 US\$
At beginning of year Recognised in profit or loss	1,502,475	2,471,041
<ul> <li>Deferred taxes on temporary differences arising on depreciation of property, plant and equipment</li> <li>Deferred taxes on temporary differences arising on loan</li> </ul>	11,012	(19,930)
impairment allowances Recognised in other comprehensive income	(318,781)	-
<ul> <li>Deferred taxes on fair valuation of available-for-sale financial assets</li> <li>Net changes in fair value</li> <li>Reclassification adjustments to profit or loss</li> </ul>	562,113 (1,888,353)	178,479 (1,127,115)
At end of year	(131,534)	1,502,475
The balance at 31 December represents temporary differences attribute	able to:	
	2016 US\$	2015 US\$
At 31 December Fair valuation of available-for-sale financial assets Loan impairment allowances Depreciation of property, plant and equipment	203,045 (318,781) (15,798)	1,529,285 - (26,810)
	(131,534)	1,502,475

The recognised deferred tax assets (2015: liabilities) are expected to be recovered/settled principally after more than twelve months.

#### 12. Accrued income and other assets

	2016 US\$	2015 US\$
Accrued interest income Amounts attributable to the Depositor Compensation Scheme Prepayments Indirect taxation Other receivables	1,119,886 815,502 291,153 46,266 13,472	1,891,580 660,515 161,365 29,707 8,163
	2,286,279	2,751,330
Share capital		
	2016 US\$	2015 US\$
Authorised 99,999,999 Ordinary 'A' shares of US\$1 each 1 Ordinary 'B' Share of US\$1 each	99,999,999	99,999,999 1
	100,000,000	100,000,000
Issued and fully paid up 22,499,999 (2015:16,299,999) Ordinary 'A' shares of US\$1 each 1 Ordinary 'B' Share of US\$1 each	22,499,999 1	16,299,999 1
	22,500,000	16,300,000

The Ordinary 'B' share, which is held by a director, does not carry any voting rights and is not entitled to receive dividends.

During 2016, by virtue of a resolution with an effective date of 19 September 2016, the Bank's shareholders approved an increase in the issued share capital from US\$16,300,000 to US\$22,500,000 through the allotment of 6,200,000 fully paid up Ordinary 'A' shares of US\$1 each.

In 2015, by virtue of a resolution with an effective date of 19 September 2015, the Bank's shareholders approved an increase in the issued share capital from US\$13,735,000 to US\$16,300,000 through the allotment of 2,565,000 fully paid up Ordinary 'A' shares of US\$1 each.

# 14. Fair value reserve

13.

The fair value reserve reflects the effects of the fair value measurement of financial instruments classified as available-for-sale, net of deferred taxes. Any gains or losses are not recognised in profit or loss until the asset has been sold or impaired.

#### 15. Other reserve

The other reserve reflects the funds allocated for general banking risks.

Banking Rule BR09 'Measures addressing credit risks arising from the assessment of the quality of asset portfolios of credit institutions authorised under the Banking Act 1994', issued by the MFSA, requires banks in Malta to hold additional reserves for general banking risks in respect of non-performing loans. This reserve is required to be funded from planned dividends.

# 16. Amounts owed to customers

	2016 US\$	2015 US\$
Term deposits Call accounts	97,691,882 22,978,874	101,526,492 42,143,809
	120,670,756	143,670,301

Amounts owed to customers are classified as liabilities at amortised cost and are subject to fixed interest rates.

#### 17. Amounts owed to banks

	2016 US\$	2015 US\$
Term loans and advances Term deposits	3,164,700 185,310	14,171,300 5,291,907
	3,350,010	19,463,207

Term loans and advances are subject to variable interest rates and are secured by a pledge over available-for-sale investments as disclosed in Note 6. These liabilities relate to the Bank's participation in the European Central Bank's open market operations.

Placements from other banks are classified as liabilities at amortised cost and are subject to fixed interest rates.

## 18. Derivative financial instruments

The fair values of derivative financial instruments held at the end of each reporting period are set out in the following table:

	2016 US\$	20 15 U <b>S</b> \$
Derivative financial liabilities		
- currency swaps	1,374,381	1,380,322

# 18. Derivative financial instruments - continued

The Bank enters into derivative contracts, mainly currency swaps, to hedge the foreign currency exposures arising out of amounts owed to customers. While these derivative transactions provide effective economic hedges, hedge accounting under the requirements of IAS 39 has not been adopted in this respect. Accordingly, these derivative contracts held for risk management purposes have been classified as held-for-trading in these financial statements in accordance with IAS 39.

The derivative financial instruments at 31 December 2016 relate to the forward purchase of £8,000,000 (2015: £8,200,000) and the forward purchase of €41,547,982 (2015: €28,500,000) against US\$ maturing within one year from the end of the reporting period at the average contractual rate of 1.2478 (2015: 1.5279) and 1.0917 (2015: 1.1317) respectively.

#### 19. Other liabilities

	2016 US\$	2015 US\$
Accrued interest expense Other payables and accrued expenses	439,538 666,705	538,409 478,713
	1,106,243	1,017,122

#### 20. Contingent liabilities and commitments

Commitments and contingencies

During 2016, the Bank was a party to a committed credit facility agreement having an undrawn balance of US\$1,118,896 (2015: US\$2,185,714) as at 31 December 2016. At the end of the reporting period, the Bank had also issued and confirmed letters of credit amounting to US\$4,405,677 (2015: nil).

# Operating lease commitments

The future minimum lease payments under non-cancellable operating leases where the Bank is a lessee are as follows:

	2016 US\$	2015 US\$
<ul><li>Not later than one year</li><li>Later than one year and not later than five years</li><li>More than five years</li></ul>	297,647 421,932 -	306,811 540,075 35,012
	719,579	881,898

The Bank's operating lease commitments relate to leases of property, motor vehicles and computer software, with standard contractual terms.

21.	Interest income		
		2016 US\$	2015 US\$
	On loans and advances to customers On financial assets classified as available-for-sale:	6,550,121	6,375,301
	- coupon interest - net amortisation of premiums and discounts On loans and advances to banks	1,512,084 26,013 319,853	2,007,566 (7,824) 82,937
		8,408,071	8,457,980
22.	Interest expense		
		2016 US\$	2015 US\$
	On amounts owed to customers On amounts owed to banks	2,808,935 82,953	3,359,868 14,203
		2,891,888	3,374,071
23.	Fee and commission income and expense		
	(a) Fee and commission income		
		2016 US\$	2015 US\$
	Trade service related fees Transfer commissions Other fees	1,150,832 357,698 29,560	803,122 261,184 22,010
		1,538,090	1,086,316
	(b) Fee and commission expense		
		2016 US\$	2015 US\$
	Loan servicing fees payable to a related party Other fees	466,055 258,992	398,896 131,235
		725,047	530,131

#### 24. Net trading (losses)/gains 2016 2015 US\$ US\$ Foreign exchange differences 2,678,185 4.978,062 Net fair value losses on foreign exchange derivative contracts (3,023,698)(4,339,787)Net gains on financial instruments classified as at fair value through profit or loss 5,817 260 (339,696)638,535 25. Net impairment charges 2016 2015 US\$ US\$ Amounts written off 3,201,188 691,232 Specific allowances 563,947 Collective allowances 346,857 Recoveries of amounts previously written off (363,519)4,111,992 327,713 26. Administrative expenses 2016 2015 US\$ US\$ Staff costs - Directors' remuneration 483,287 463,945 - Other staff salaries 1,037,838 842,223 - Social security costs 42,747 31,338 Directors' fees 90,737 76,041 Depreciation of property, plant and equipment (Note 9) 44,440 39,472 Amortisation of intangible assets (Note 10) 26,236 52,142 Operating lease expenses 452,997 478,175 Other administrative expenses 727,185 644,116 2,905,467 2,627,452

Other administrative expenses mainly comprise contribution to depositor compensation scheme, maintenance expenditure, professional fees, marketing expenses and other services or expense items which are incurred in the course of the Bank's operations.

# 26. Administrative expenses - continued

Average number of persons employed by the Bank throughout the financial year:

	2016	2015
- Managerial - Clerical	8 10	8 6
	18	14

# Auditor's remuneration

Fees charged by the auditor for services rendered during the financial year relate to the following:

	2016 US\$	2015 US\$
Annual statutory audit	58,610	50,570
Other assurance services	16,604	11,095
Tax compliance and advisory services	7,444	2,413
Other non-audit services	42,062	44,155
	124,720	108,233

# 27. Tax expense

	2016 US\$	2015 US\$
Current tax expense Deferred tax expense	1,857,045 (307,769)	2,312,005 (19,930)
	1,549,276	2,292,075

The tax on the Bank's profit before tax differs from the theoretical amount that would arise using the effective tax rate applicable to the Bank as follows:

	2016 US\$	2015 US\$
Profit before tax	4,367,366	6,543,793
Tax on profit at 35% Tax effect of: Disallowable expenses	1,528,578 20,698	2,290,328 1,747
	1,549,276	2,292,075

#### 28. Dividends

	2016 US\$	2015 US\$
Dividends paid to equity holders	4,250,000	1,755,000
Dividends per ordinary share	0.19	0.11

# 29. Cash and cash equivalents

For the purposes of the statement of cash flows, cash and cash equivalents comprise the following balances with contractual maturities of not more than three months and which form an integral part of the Bank's cash management:

	2016 US\$	2015 US\$
Cash in hand (Note 4) Cash with Central Bank of Malta (Note 4) Loans and advances to banks	851 3,164,700 12,023,663	3,336 - 50,465,105
	15,189,214	50,468,441

### 30. Related party transactions

IIG Malta Ltd is the Bank's immediate parent Bank (refer to Note 31). This immediate parent is wholly owned by IIG Trade Opportunities Fund N.V. (refer to Note 31). All entities which are ultimately controlled by IIG Trade Opportunities Fund N.V. are considered related parties.

As part of its operations, the Bank enters into participation transactions initiated by related parties in the normal course of business (Note 8). All transactions with related parties were carried out on commercial terms and at market rates in accordance with the Bank's policy. The Bank's expenditure for the year ended 31 December 2016, included amounts of US\$466,055 (2015: US\$398,896) payable to a related party, IIG Trade Finance LLC, as loan arrangement fees.

Key management personnel compensation, consisting of directors' remuneration, has been disclosed in Note 26.

# 31. Statutory information

IIG Bank (Malta) Ltd is a limited liability company and is incorporated in Malta.

The immediate parent company of IIG Bank (Malta) Ltd is IIG Malta Ltd, a company registered in Malta that owns all the shares of IIG Bank (Malta) Ltd with the exception of one share. Its registered address is Level 20, Portomaso Business Tower, Portomaso, St Julians. The immediate parent is exempt from the preparation of consolidated financial statements by virtue of section 173 of the Maltese Companies Act, 1995.

IIG Bank (Malta) Ltd is ultimately owned by IIG Trade Opportunities Fund N.V., a fund registered in Curacao, the Kingdom of the Netherlands, with its registered office at ANT Management (Curacao) N.V., Kaya W.F.G. (Jombi) Mensing 36, Willemstad Curacao. The Fund's Investment Manager is International Investment Group LLC, a company registered in New York and licensed by the US Securities and Exchange Commission.

The financial statements of IIG Bank (Malta) Ltd are included in the consolidated financial statements of IIG Trade Opportunities Fund N.V., which are prepared in accordance with the requirements of International Financial Reporting Standards.

Additional Regulatory Disclosures 31 December 2016

### 1. Risk management

# 1.1 Overview of risk disclosures

The Additional Regulatory Disclosures ('ARDs') were prepared by the Bank in accordance with the Pillar 3 quantitative and qualitative disclosure requirements as governed by Banking Rule 07 ('BR/07'): Publication of Annual Report and Audited Financial Statements of Credit Institutions authorised under the Banking Act, 1994, issued by the Malta Financial Services Authority. These disclosures are based on the disclosure requirements of Directive 2013/36/EU (Capital Requirements Directive) and EU Regulation No. 575/2013 (Capital Requirements Regulation) of the European Parliament and of the Council of 26 June 2013. These ARDs are published on an annual basis as part of the Annual Report of the Bank and seek to increase public disclosure relative to a Bank's capital structure and adequacy as well as its risk management policies and practices.

In line with the banking regulatory requirements, these ARDs are not subject to an external audit, except to the extent that any disclosures are equivalent to those made in the Financial Statements which are prepared in accordance with the requirements of International Financial Reporting Standards ('IFRS') as adopted by the EU. Through internal verification procedures the Bank ensures that these disclosures are presented fairly.

# 1.2 Risk management framework

The Bank's business model throughout the years has been that of developing a stable deposit base and investing its funds principally in trade finance assets, with excess liquidity invested in a portfolio of select debt securities. The Bank is committed to creating lasting value for shareholders by focusing on customer-driven business and by employing specialised staff that work with clients to find solutions. In keeping with this mission, the Bank's strategy targets sustainable growth and a low risk profile. In this respect, the Bank's return on assets calculated as its net profit, expressed as a percentage of average total assets, for the reporting period ended 31 December 2016 is 1.62%.

The management team selects the Bank's customers and the projects it finances with prudence and caution. The Bank is especially conscious of the risks involved in trade finance transactions, not only as a result of its exposure to the arising credit risk involved but also to the operational risk intrinsic within the business. Therefore, it strives to minimise its exposure to operational risk by taking on transactions only when it knows how to manage the resulting risk. This culture is fostered across the entire Bank.

The Bank takes on risk with the aim of generating profits and therefore considers risk management a core competency that helps produce higher returns for its various stakeholders. The Bank bases its risk management objectives and policies on international guidelines, such as the Basel III Accord, corresponding Directives and Regulations of the European Union, including technical standards, as well as contemporary international banking practices. In this respect, the Board of Directors deems the risk management framework adopted by the Bank to be adequate and hence gives assurance to the Bank's stakeholders that the risk management systems adopted by the Bank are appropriate in relation to the Bank's risk profile and strategy.

# 1. Risk management - continued

# 1.2 Risk management framework - continued

The main categories of risk to which the Bank is exposed to are:

- Credit risk: Credit risk stems from the loss of equity and profit as a result of the possible non-prompt repayment or non-payment of existing and contingent obligations by the Bank's counterparties. Therefore this represents the risk that the deterioration in the financial condition of a borrower will cause the asset value to decrease or be extinguished. Country risk and settlement risk are included in this category. Country risk refers to the risk of losses arising from economic or political changes that affect the country in which the asset is originated. Settlement risk refers to the risk of losses through failure of the counterparty to settle outstanding dues on the settlement date owing to bankruptcy or other causes.
- Market risk: Risk of losses arising from unfavourable changes in the level and volatility of interest rates, foreign exchange rates or investment prices.
- Liquidity risk: Liquidity risk may be divided into two sub-categories:
  - Market (product) liquidity risk: risk of losses arising from difficulty in accessing a product or market at the required time, price and volume.
  - Funding liquidity risk: risk of losses arising from a timing mismatch between investing, placements and fund raising activities resulting in obligations missing the settlement date or satisfied at higher than normal rates.
- Operational risk: Risk of damage resulting from the lack of skilful management or good governance within the Bank and the inadequacy of proper control, which might involve internal operations, personnel, system or external occurrences that in turn affect the income and capital funds of financial institutions. The Bank has adopted an operational risk management framework and procedures, which provide for the identification, assessment, management, monitoring and reporting of the Bank's operational risks.

The Bank aims to manage these risks by applying methods that meet best practice and considers it important to have a clear distribution of responsibilities for risk management across the Bank, from the Board of Directors, and the Audit Committee, which performs the functions of the Risk Committee, to executive management and internal audit.

The Board of Directors is ultimately responsible for the establishment and oversight of the Bank's risk management framework through the development and monitoring of compliance with the Bank's risk management policies. The aim of the risk management framework is to support the Bank in achieving its goals and objectives and ensure that the risks are commensurate with the rewards.

The Board establishes the risk appetite of the Bank which is the maximum risk that the Bank is willing to assume to meet business targets. The risk appetite is set in a process based on a thorough analysis of its current risk profile. The Bank identifies a number of key risk components and for each, determines a target that represents the Bank's perception of the component in question. The Bank's risk appetite is a key tool to ensure coherence between the Bank's strategic considerations regarding risk-taking and day-to-day decisions.

# 1. Risk management - continued

#### 1.2 Risk management framework - continued

The Audit Committee is appointed to oversee the formulation of the Bank's overall risk management policy, to review risk measurement and monitoring mechanisms within the Bank and to monitor the effectiveness of the Bank's risk management practices, and thus is responsible for performing the roles of a Risk Committee. In the course of managing this framework the Audit Committee focuses on four key infrastructure components of effective risk management programmes with specific control activities:

- Active Executive Management oversight;
- Adequate detailed policies, procedures and discretionary limits;
- Adequate risk-measurement, monitoring and management information systems; and
- Comprehensive automated and manual internal controls.

The Audit Committee convened 5 times during the period under review.

Authority to operate the Bank is delegated to the Executive Team within the limits set by the Board. The Executive Team is made up of the Bank's Chief Officers, namely the Deputy Chief Executive Officer, the Chief Finance Officer, the Chief Operations Officer, the Chief Officer for Private Banking and the Chief Risk Officer, and is led by the Chief Executive Officer. It is responsible for the Bank's day-to-day operations and is involved in taking on risks in a targeted manner and managing them professionally. The Bank has an appropriate organisational structure for planning, executing, controlling and monitoring business operations in order to achieve the Bank's objectives.

The Executive Team aims to manage all major types of risk by applying methods that meet best practice. One of the main tasks of the Bank's Executive Team, and more specifically, the Chief Risk Officer's task, is to set the framework for this area of entity wide risk management. The core functions of the Bank's risk management processes are to identify all key risks for the Bank, measure these risks, manage the risk positions and determine capital allocations.

The Bank's independent Internal Audit function reviews the adequacy and proper operation of internal controls in individual areas of operation, and performs ad-hoc reviews of risk management controls and procedures. The function and reports its findings to the Audit Committee.

#### 2. Credit risk

# 2.1 Introduction to credit risk

Credit risk is the risk of suffering financial loss, should any of the Bank's clients or market counterparties fail to fulfil their contractual obligations to the Bank. Credit exposures arise principally through the Bank's participation in trade financing transactions. The Bank's business activities during the financial period under review principally consisted of participations in financing transactions through a master participation agreement with the related parties IIG Trade Opportunities Fund N.V. and IIG TOF B.V., discounting of receivables and the Bank's direct financing of international trade.

Credit risk constitutes the Bank's largest risk in view of its lending activities and therefore the Bank is fully aware of the connotations of such risk and places great importance on its effective management. The Bank's portfolio of loans and advances to customers is monitored on an ongoing basis and the relevant management bodies, including the Board of directors and the Executive Committee, are kept informed on an ongoing basis of developments in the credit portfolio, non-performing loans and other relevant information.

#### 2.2 Credit risk management

The granting of a credit facility is based on the Bank's insight into the customer's financial position, which is reviewed regularly to assess whether the basis for the granting of credit has changed. Furthermore, the customer must be able to demonstrate, in all probability, the ability to repay the debt.

In order to measure its principal risk exposures, the Bank compiles due diligence reports and in most circumstances refers to external reviews of the primary borrowers and their respective assignees of export receivables carried out by agencies such as Dun and Bradstreet or their equivalents.

The Bank's Credit function is responsible for undertaking and managing credit risk with respect to the Bank's lending activities, which covers all the stages within the lending cycle, from credit proposal to credit recovery procedures. The Bank manages, limits and controls concentrations of credit risk arising from loans and advances wherever they are identified – in particular, to individual customers, to industry sectors and to geographical locations. Hence, the Bank structures the levels of credit risk it undertakes by placing limits on the amount of risk in relation to one borrower, or groups of borrowers, to industry segments and to different countries. Such risks are monitored on an ongoing basis and subject to frequent review, as considered necessary. Limits on the level of credit risk by industry sector and country are approved by the Board of Directors. Limits to individual borrowers are approved by the Executive Committee and ratified by the Board. Actual exposures against limits are monitored at end of day on a daily basis and on a real time basis too. As highlighted previously, the Bank's reporting framework with respect to lending credit risk is comprehensive with regular reporting by the Credit function to the Board and the Executive Committee on adherence to limits, activity levels, performance measures and specific credit risk events.

In order to minimise the credit risk undertaken in examining a counterparty's creditworthiness, country risk, quantitative and qualitative characteristics, as well as the industry sector in which the counterparty operates are considered. The Bank has also set limits of authority and has segregation of duties in place so as to maintain impartiality and independence during the approval process and to control new and existing credit facilities. Credit review procedures are designed to identify at an early stage exposures which require more detailed monitoring and review. The Bank's principal credit risk exposures reflecting the maximum exposure to credit risk before collateral held or other credit enhancements in accordance with the regulatory information submitted to the MFSA are as follows:

	2016 Average value US\$	2016 Year end exposure value US\$
Central governments or central banks Public sector entities	17,286,007 1,374,663	9,050,816
Institutions	45,371,759	1,637,205 27,415,029
Corporates	101,749,547	104,194,977
Exposures in the form of units or shares in CIUs	7,167,394	11,609,537
Other items	2,740,894	2,567,333
	175,690,264	156,474,897

The exposures set out in the preceding table are based on the sum of on-balance sheet exposures and off-balance sheet exposures adjusted for the credit conversion factors stipulated within Article 166(10) of the CRR.

#### 2.2 Credit risk management - continued

Credit risk exposures analysed by residual maturity

As at 31 December 2016	Within one month US\$	Within three months but over one month US\$	Within one year but over three months US\$	More than one year US\$	No maturity US\$	Total US\$
Central governments or						
central banks	3,164,700	-	-	5,182,578	703,538	9,050,816
Public sector entities	-	-	-	1,637,205	-	1,637,205
Institutions	2,231,402	2,305,303	6,424,379	6,735,585	9,718,360	27,415,029
Corporates	18,202,216	28,416,562	35,892,778	21,683,421	-	104,194,977
Exposures in the form of						
units or shares in CIUs	-	-	-	-	11,609,537	11,609,537
Other items		-	-	-	2,567,333	2,567,333
Total	23,598,318	30,721,865	42,317,157	35,238,789	24,598,768	156,474,897

#### 2.3 Concentration risk

Concentration risk arises as a result of the concentration of exposures within the same category, whether it is geographical location, industry sector or counterparty type. These risks are managed through adherence to Board approved lending criteria.

The Bank is exposed to a significant concentration of credit risk with respect to its loans and advances to customers since a significant proportion of the total loans and advances amounting to US\$89,031,527 are due from a limited number of customers. As at 31 December 2016, loans and advances to customers amounting to US\$60,995,593 were deemed to be large exposures for regulatory reporting purposes, prior to any eligible exemptions, in accordance with the requirements the CRR.

Exposures analysed by location/geographical region

The Bank monitors concentrations of credit risk by location. The geographical concentration of the Bank's exposure classes as at the end of the reporting period is analysed in the following table. For the purposes of this table, the Bank has allocated exposures classes to regions based on the country of domicile of the counterparties or customers.

As at 31 December 2016	Latin America US\$	Malta US\$	Other EU countries US\$	Rest of world US\$	Total US\$
Central governments or central banks	888,382	7,531,547	243,787	387,100	9,050,816
Public sector entities	-	-	1,637,205	-	1,637,205
Institutions	1,453,648	2,719,999	8,891,298	14,350,084	27,415,029
Corporates	42,257,840	355,337	18,301,031	43,280,769	104,194,977
Exposures in the form of units or					
shares in CIUs	-	11,609,537	-	-	11,609,537
Other items		2,567,333	-	-	2,567,333
Total	44,599,870	24,783,753	29,073,321	58,017,953	156,474,897

#### 2.3 Concentration risk - continued

Exposures analysed by industry

The following is an analysis of the industry concentrations relating to the Bank's exposures:

	Central governments or central banks & Public sector entities	Institutions US\$	Corporates US\$	Exposures in the form of units or shares in CIUs & Other items US\$	Total US\$
Government	10,688,021	-	_	-	10,688,021
Financial services	-	27,415,029	-	11,609,537	39,024,566
Wholesale trade commodities	-	-	43,328,189	-	43,328,189
Manufactured commodities	-	-	21,222,212	-	21,222,212
Agriculture, forestry and fishing	-	-	18,718,565	-	18,718,565
Mining	-	-	5,613,832	-	5,613,832
Transport	-	-	9,929,733	-	9,929,733
Other		-	5,382,446	2,567,333	7,949,779
Total	10,688,021	27,415,029	104,194,977	14,176,870	156,474,897

None of the Bank's exposures constitute exposures to SMEs (small and medium-sized enterprises).

# Counterparty banks' risk

The Bank runs the risk of loss of funds due to the possible delay in the repayment of existing and future obligations by counterparty banks. Within its daily operations the Bank transacts with banks and other financial institutions which are pre-approved and subject to a limits framework. In the normal course of business, the Bank places deposits and enters into foreign exchange derivative contracts with high credit quality banks and financial institutions. By conducting these transactions the Bank is running the risk of losing funds due to the possible delays in the repayment to the Bank of the existing and future obligations of the counterparty banks. The positions are checked against the limits on a daily basis at end of day and on a real time basis.

#### Country risk

The Bank runs the risk of loss of funds due to the possible political, economic and other events in a particular country where funds have been placed or invested with several counterparties. Countries are assessed according to their size, economic data and prospects and their credit ratings from international rating agencies. Existing country credit risk exposures are monitored and reviewed periodically.

# 2.4 Use of External Credit Assessment Institutions

The Bank uses an External Credit Assessment Institution ('ECAI') in calculating its risk-weighted exposure amounts for Central governments or central banks, Institutions and Corporates for which a credit assessment is available. The credit quality of such exposures is determined by reference to credit ratings applicable to issuers published by Fitch Ratings. The Bank maps Fitch's ratings to the credit quality steps prescribed in the CRR as required by 'Implementing Technical Standard on the credit quality steps for ECAIs credit assessments'.

The following table represents the exposure values for which an ECAI is used:

At 31 December 2016	Credit quality step	Central governments or central banks US\$	Public sector entities US\$	Corporates and Institutions US\$	Total US\$
AAA to AA-	1	-	1,637,205	4,440,791	6,077,996
A+ to A-	2	4,057,338	-	9,509,306	13,566,644
BBB+ to BBB-	3	4,139,996	-	5,542,969	9,682,965
BB+ to BB-	4	-	-	10,521,797	10,521,797
B+ to B-	5	853,482	-	6,902,263	7,755,745
CCC+ and below	6		-	529,185	529,185
Total		9,050,816	1,637,205	37,446,311/	48,134,332

# 2.5 Credit quality of the Bank's financial assets

Loans and advances to customers

The credit function monitors loans and advances to customers on an individual basis throughout the different stages of the cycle, from approval upon origination until maturity. As highlighted previously, the Bank focuses on the compilation, together with ongoing and event-driven updating of due diligence analyses taking cognisance of actual account developments, repayment history, ability to meet commitments and collateral measurement. Loans and advances to customers are primarily secured via an assignment of export receivables of the borrower and through a cross-collateral in the form of a floating charge over assets.

With respect to loans and advances to customers, the Bank reviews and grades advances into two main categories: 'Performing' and 'Non-performing'. 'Performing' customers represent those customers with exposures which are less than 90 days past due, whilst 'Non-performing' customers are those customers with exposures which are past due by 90 days or more. The 'Performing' category is further sub-divided into three sub-categories, namely 'Regular', 'Watch' and 'Substandard', showing a worsening of the customer's financial status from 'Regular' (less than 30 days past due) to 'Substandard' (more than 60 days past due but less than 90 days past due). The Non-performing category is also referred to as the 'Doubtful' category.

Loans are considered past due when a counterparty has failed to make a payment when contractually due. Past due but not impaired loans comprise loans and advances where contractual interest or principal payments are past due, but the Bank believes that impairment is not appropriate on the basis of the level of security available and/or the stage of collection of amounts owed to the Bank.

# 2.5 Credit quality of the Bank's financial assets - continued

As at 31 December 2016, loans and advances to customers mainly were deemed to be fully performing with the exception of assets amounting to US\$1,783,226 which were past due and impaired. Accordingly, they are classified as "watch". These amounts were past due by one to six months however a portion of them were settled shortly after the end of the reporting period while the remaining balance not settled was impaired. Accordingly, disclosure of past due amounts by geographical location and industry sector is not deemed necessary in view of the significance of this risk. All the other financial assets as at 31 December 2016 were fully performing. The Bank does not hold renegotiated financial assets as at the end of the reporting period in view of the nature of the advances portfolio the Bank does not generally apply forbearance practices.

Impaired loans and advances to customers represent those advances which are either more than 90 days past due, or for which the Bank has determined that it is probable that it will be unable to collect all principal and interest due as prescribed within the contractual terms of the loans and advances agreement(s). During the period under review, the Bank has written off loans and advances to customers amounting to US\$3,201,188.

#### Financial investments

As part of its treasury management activities the Bank invests in debt instruments issued by local government as well as a portfolio of debt securities issued by high quality foreign corporates and institutions. All such instruments are listed and accordingly the quality of these assets is monitored through the use of external ratings (see note 2.4 above). These transactions are also monitored through the practical use of exposure limits. At the end of the reporting period, the Bank had no past due or impaired financial assets within this category.

Liquidity in excess of operational requirements is also placed in a money market fund that mainly seeks to invest in term deposits with Prime European Banks and Malta Government Treasury bills.

# 2.6 Credit risk mitigation techniques

The Bank's approach when granting credit facilities is based on the customer's capacity to repay rather than placing primary reliance on credit risk mitigants. Notwithstanding, as part of the Bank's credit risk mitigation techniques, the Bank holds collateral against loans and advances to customers, the nature and level of which generally depends on the amount of the exposure, the type of facility provided, the term of the facility and the level of credit risk involved. Collateral utilised to secure loans and advances include guarantees, pledges in the form of a floating charge over inventories, the assignments of receivables, as well as bills of exchange.

At 31 December 2016	Total exposure US\$	Cash or quasi cash US\$	Exposure value after credit risk mitigants US\$
Corporates	89,031,527	6,796,677	82,234,850

# 3. Counterparty credit risk

Counterparty credit risk refers to the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows. The Bank is primarily exposed to counterparty credit risk through derivative exposures, which mainly relate to currency swaps.

Counterparty credit risk in respect of currency swaps is subject to approval from the Bank's Executive Committee, in its function as the ALCO. Entry into derivative exposures will be subject to prior implementation of appropriate settlement risk and risk management infrastructure pursuant to a signed ISDA agreement. Exposure to derivative counterparties and the related credit risk is mitigated through the use of netting and collateralisation agreements.

In order to determine the potential future exposure, the notional amounts or underlying values, as applicable, are multiplied by the percentages stipulated in Table 1 of Article 274(2)(c) of the CRR. Given that all of the Bank's derivative exposures relate to foreign exchange contracts with residual maturities of less than one year, the Bank applies a 1% rate on the notional amounts of the derivative exposures. In this respect, the Bank's risk weighted exposure as at 31 December 2016 amounted to US\$162,582, requiring minimum regulatory capital of US\$13,007.

#### 4. Market risk

Market risk for the Bank consists of the following elements:

- Interest rate risk, which is the risk of losses because of changes in interest rates; and
- Foreign exchange risk, which is the risk of losses on the Bank's positions in foreign currency because of changes in exchange rates.

# 4.1 Interest rate risk

Cash flow interest rate risk is the risk that the future cash flows of a financial instrument will fluctuate because of changes in market interest rates. Fair value interest rate risk is the risk that the value of a financial instrument will fluctuate because of changes in market interest rates.

The Bank's exposure to interest rate risk is analysed in the table below:

At 31 December 2016	Floating rates US\$	Fixed rates US\$	Total US\$
Financial assets	66,490,498	84,990,454	151,480,952
Financial liabilities	3,164,700	120,856,066	124,020,766
Net exposure	63,325,798	(35,865,612)	27,460,186

The Bank's Executive Team is responsible for the management of interest rate risk and for actively monitoring the interest rate risk measures used by the Bank, by reporting on a regular basis to the Board. Responsibility for day-to-day interest rate risk management is allocated to the Treasury function. The Bank's risk oversight function provides oversight with respect to the interest rate risk management process, by ensuring its design is appropriate and functioning properly.

Financial instruments issued at fixed rates potentially expose the Bank to fair value interest rate risk. Loans and advances to customers and to banks, and amounts owed to customers and banks are measured at amortised cost and are therefore not subject to fair value interest rate risk.

#### 4. Market risk - continued

#### 4.1 Interest rate risk - continued

The Bank's instruments that are fair valued comprise the Bank's overnight investments in a money market fund which are fair valued through profit or loss and debt securities classified as available-for-sale. A significant proportion of the Bank's investments in debt securities are subject to fixed interest rates. The risk of losses arising from fair value interest rate risk in this respect is principally managed by investing in debt securities issued by the Government of Malta and in securities issued by high quality foreign corporates. The Bank manages this risk by utilising sensitivity analysis based on modified duration, which measures the potential loss in market value arising from a 100 basis-point upward parallel shift in yields. The estimated impact of an immediate 100 basis point increase in yields as at 31 December 2016 on the fair valuation of its investments carried at fair value (debt securities and units in the money market fund) amounts to US\$1,174,779. These investments are mainly denominated in euro.

The Bank is exposed to cash flow interest rate risk principally in respect of certain financial instruments which were subject to floating interest rates. Financial assets and liabilities issued at variable rates expose the Bank to cash flow interest rate risk. Cashflow interest rate risk is measured and monitored by reference to a sensitivity analysis in respect of interest rate changes in relation to the Bank's net floating rate assets or liabilities.

At the end of the reporting period, if interest rates had increased by 1% (assuming a parallel shift of 100 basis points in yields) with all other variables held constant, in particular foreign currency rates, the post-tax result for the year would increase by US\$411,618.

The following table summarises the Bank's exposures to interest rate risk. It includes the entity's financial instruments at carrying amounts, categorised by re-pricing dates, taking cognisance of the instruments' interest rate terms. For the entity's interest bearing assets and liabilities that are mainly subject to fixed interest rates, the re-pricing periods are generally equivalent to the remaining period to maturity.

	Within one month US\$	Within three months but over one month US\$	Within one year but over three months US\$	More than one year US\$	Total US\$
As at 31 December 2016					
Financial assets	79,216,955	9,446,839	29,842,847	32,974,311	151,480,952
Financial liabilities	28,637,821	28,358,058	30,706,287	36,318,600	124,020,766
Interest rate gap	50,579,134	(18,911,219)	(863,440)	(3,344,289)	_
Cumulative gap	50,579,134	31,667,915	30,804,475	27,460,186	-

#### 4. Market risk - continued

#### 4.2 Currency risk

The Bank takes on exposure to the effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows. Foreign exchange risk is the risk to earnings and value caused by a change in foreign exchange rates. Foreign exchange risk arises when financial assets or liabilities are denominated in currencies which are different from the Bank's functional currency.

The Bank funds its growth through the acceptance of deposits predominantly denominated in euro and through the credit operations (Refinancing Operations) of the Central Bank of Malta within the Eurosystem's credit operations framework.

The Bank manages its currency risk on an ongoing basis by ensuring that foreign currency liabilities are utilised to fund assets denominated in the same foreign currency thereby matching asset and liability positions as much as is practicable. When it is not possible to match the asset and liability currency positions, the Bank normally hedges its open foreign exchange exposures arising from customer deposits by entering into forward foreign exchange contracts or currency swaps with terms which match those of the hedged items, with a view to reducing exposures within a limit management framework.

The Bank's Treasury function is responsible for the effective management of foreign exchange risks, ensuring exposures to foreign currencies are maintained within the limits set by the Bank's Board. The Board sets these limits on the level of exposure by currency and in aggregate for both overnight and intra-day positions, which are actively monitored and reported on a regular basis. The Bank's risk oversight function provides oversight with respect to the foreign exchange risk management process, by ensuring its design is appropriate and functioning properly.

The following table summarises the Bank's exposure to foreign currency exchange rate risk at 31 December. Included in the table are the Bank's financial instruments at carrying amounts, categorised by currency.

	US\$	GBP US\$	Euro US\$	Total US\$
As at 31 December 2016				
Financial assets	111,589,261	1,555,523	40,285,028	153,429,812
Financial liabilities	26,570,533	11,656,536	86,899,940	125,127,009
Net on balance sheet position	85,018,728	(10,101,013)	(46,614,912)	
Off-balance sheet net notional Position		9,883,200	43,828,966	
Net currency exposure		(217,813)	(2,785,946)	

### 5. Liquidity risk

Liquidity risk is the risk that the Bank is unable to meet its payment obligations associated with its financial liabilities when they fall due and to replace funds when they are withdrawn. The consequence may be the failure to meet obligations to repay depositors and fulfil commitments.

The Bank manages this risk by maintaining a strong base of shareholders' capital considering the initial stages of its operations. The Bank manages its asset base with liquidity in mind, and monitors future cash flows and changes in available liquidity on a regular basis.

The Bank holds a diversified portfolio of cash and high-quality highly-liquid securities to support payment obligations and contingent funding in a stressed market environment. The Bank's assets held for managing liquidity risk comprise:

- · short term placements with other banks;
- investments in a money market fund; and
- unencumbered Government bonds amounting to US\$498,609 that are readily acceptable for repurchase agreements with central banks.

Liquidity is managed by the Bank's treasury function and the Bank's liquidity management process, includes:

- day to day funding managed by monitoring future cash flows to ensure that requirements can be met including plans for replenishment of funds as they mature;
- maintaining a portfolio of highly marketable assets that can easily be liquidated as protection against any unforeseen interruption to cash flow;
- · monitoring the liquidity ratios against internal and regulatory requirements; and
- managing the concentration and profile of debt maturities.

Moreover, sources of liquidity are regularly reviewed by the treasury function to maintain a wide diversification by provider, product and term. Monitoring takes the form of cash flow projections for the next day, week and month respectively, as these are key periods for liquidity management.

In this light, reporting of measures of liquidity risk and liquidity ratios compared to prescribed internal limits to the Board and Executive Team is effected on a regular basis. The Bank's risk oversight function provides oversight with respect to the liquidity risk management process, by ensuring its design is appropriate and functioning properly.

### 5. Liquidity risk - continued

Analysis by residual maturity

The following table discloses financial assets and liabilities at the end of the reporting period by remaining period to maturity.

	Within one month US\$	Within three months but over one month US\$	Within one year but over three Months US\$	More than one year US\$	No maturity US\$	Total US\$
As at 31 December 2016						
Financial assets	31,340,409	30,879,953	42,517,328	35,550,073	13,142,048	153,429,812
Financial liabilities	29,834,455	28,663,965	31,113,005	36,554,365	336,000	125,501,790
Maturity gap	1,505,954	2,215,988	11,404,323	(1,004,292)	_	
Cumulative gap	1,505,954	3,721,942	15,126,265	14,121,973	-	

The following table analyses the Bank's principal undiscounted cash flows payable under non-derivative financial liabilities into relevant maturity groupings based on the remaining period at the end of the reporting period to the contractual maturity date.

As at 31 December 2016	Within one month US\$	Within three months but over one month US\$	Within one year but over three months US\$	More than one year US\$	Total US\$	Carrying amount US\$
Financial liabilities	29,023,133	28,471,202	31,285,173	36,787,113	125,566,621	125,127,009

#### 6. Operational risk

Operational risk is the risk of direct or indirect loss arising from a wide variety of causes associated with the Bank's processes, personnel, technology and infrastructure, and from external factors other than credit, market and liquidity risks such as those arising from legal and regulatory requirements and generally accepted standards of corporate behaviour. The Bank's Board of directors is primarily responsible for the development and implementation of policies and procedures to ensure that operational risks are managed effectively. The Bank mitigates the possibility of impact risk events through the implementation of a business continuity plan, which encompasses risk mitigation achieved through back-up information security infrastructures, back-up disaster recovery sites and insurance covers over particular business risks. Such systems enable the Bank to operate on an ongoing basis and limit losses in the event of severe business disruption.

The Bank's management of operational risk relies on a framework of policies and procedures implemented across the Bank's operational functions through transaction processing and business execution. The implementation of these policies and procedures is overseen by the Bank's risk oversight function. Regular reporting of operational risk events to the Board of Directors is carried when required.

The Bank currently uses the Basic Indicator Approach to assess the operational risk capital requirements and accordingly allocates 15% of average gross income for a three year period in accordance with regulatory requirements. The operational risk regulatory capital requirement as at December 2016 amounted to US\$1,370,996.

#### 7. Capital risk management

The Bank's objectives when managing capital, which is a broader concept than the 'equity' as disclosed in the statement of financial position, are:

- to comply with the capital requirements set out in the CRD IV and the CRR;
- to safeguard the Bank's ability to continue as a going concern so that it can continue to provide returns for shareholders and benefits for other stakeholders; and
- to maintain a strong capital base to support the development of its business.

Capital adequacy and the use of regulatory capital are monitored on an ongoing basis by the Bank's management, employing techniques based on the guidelines developed by the Basel Committee, European Union Regulations and Directives, as implemented by the MFSA for supervisory purposes. The Bank's capital risk management is based on the regulatory requirements established within the CRR and by local regulations which are modelled on the requisites of the CRD rules.

The Bank's Executive team is primarily responsible for the Bank's capital risk management process. Capital adequacy ratios together with the level and quality of own funds are reported on a regular basis to the Board of Directors by the Finance function.

The Bank is required to maintain a ratio of total regulatory capital to risk-weighted assets ("Capital requirements ratio") above the prescribed minimum level of 8%.

The minimum capital requirements are calculated for credit, market and operational risks. During the year, the Bank utilised the Standardised Approach for credit risk, the Basic Indicator Approach for operational risk and the Basic Method for foreign exchange risk in order to calculate the Pillar 1 minimum capital requirements. For credit risk, under the standardised approach risk weights are determined according to credit ratings provided by internationally recognised credit agencies such as Fitch or their equivalents and by using the applicable regulatory risk weights for unrated exposures. The Basic Indicator Approach requires that the Bank allocates capital for operational risk by taking 15% of the average gross income, while the Basic Method requires the Bank to allocate 8% of its overall net foreign exchange position to calculate the capital requirement for foreign exchange risk.

#### 7.1 Own funds

The level of Own funds represents the Bank's available capital and reserves for the purposes of assessing capital adequacy from a regulatory perspective. The total capital ratio is a measure of the long-term financial strength of a bank, usually expressed as a ratio of its own funds or capital to the measure of the Bank's assets. The Bank has processes to ensure that the minimum regulatory requirements in relation to own funds are met at all times, through the assessment of its capital resources and requirements. During the financial period ended 31 December 2016, the Bank has complied with all the externally imposed capital requirements to which it was subject.

In July 2013, the European Banking Authority ('EBA') issued its final draft Implementing Technical Standards ('ITS') on own funds disclosures. The disclosure requirements of these technical standards have been integrated within the Bank's disclosures set out below.

For regulatory purposes, the Bank's capital base is divided into Common Equity Tier 1 ('CET1') capital and Tier 2 capital. The Bank's CET1 capital includes ordinary share capital, retained earnings, reserve for general banking risks and other regulatory adjustments relating to items that are included in equity but treated differently for capital adequacy purposes, including deductions to amounts pledged in favour of the Depositor Compensation Scheme and any unrealised gains or losses in the fair valuation of available-for-sale financial assets, net of deferred taxation.

The Bank's Tier 2 capital consists of an investment revaluation reserve, which represents unrealised gains in the fair valuation of available-for-sale financial assets, net of deferred taxation.

### (a) Share capital

The Bank's share capital as at 31 December 2016 is analysed as follows:

2016 No. of	2016
shares	US\$
99,999,999	99,999,999
1	1
100,000,000	100,000,000
22,499,999	22,499,999
1	1
22,500,000	22,500,000
	No. of shares 99,999,999 1 100,000,000 22,499,999 1

#### 7.1 Own funds - continued

The holders of Ordinary 'A' shares are entitled to receive dividends as declared from time to time and are entitled to one vote per share at meetings of the Bank. All shares rank equally with regard to the Bank's residual assets.

The Ordinary 'B' share, which is held by a director, does not carry any voting rights and is not entitled to receive dividends.

#### (b) Retained earnings

The retained earnings represent earnings not paid out as dividends.

Retained earnings form part of Own funds only if those profits have been verified by the Bank's independent external auditor. The Bank has demonstrated to the satisfaction of the competent authority that any foreseeable charge or dividend has been deducted from the amount of those profits.

Retained earnings include an amount of US\$815,502 pledged in favour of the Depositor Compensation Scheme as at 31 December 2016, that are not available to the Bank for unrestricted and immediate use to cover risk of losses as soon as they occur. The Depositor Compensation Scheme Reserve is excluded for the purposes of the Own Funds calculation.

#### (c) Fair value reserve

This represents the cumulative net change in fair values of available-for-sale assets held by the Bank, net of related deferred tax effects.

### 7.1 Own funds - continued

As described in the CRR published by the European Commission, banks are required to present a transitional disclosure template during the phasing in of regulatory adjustments from 1 January 2014 to 31 December 2017. The transitional disclosure template is set out below.

	As at 31 December 2016 US\$
Common Equity Tier 1 (CET1) capital	
Common Equity Tier 1 (CET1) capital: instruments and reserves	
Capital instruments and the related share premium accounts	22,500,000
Retained earnings Accumulated other comprehensive income (and other reserves)	2,040,027 391,875
CET1 capital before regulatory adjustments	24,931,902
Common Equity Tier 1 (CET1) capital: regulatory adjustments	
Intangible assets Regulatory adjustments relating to unrealised	(61,127)
gains and losses pursuant to Articles 467 and 468	(254,319)
Total regulatory adjustments to CET1	(315,446)
CET1 capital	24,616,456
Tier 2 capital	
Tier 2 capital before regulatory adjustments	-
Tier 2 capital: regulatory adjustments Regulatory adjustments relating to unrealised	
gains pursuant to article 468	254,319
Total Tier 2 capital	254,319
Total risk weighted assets	157,618,953
Capital ratios	
CET1 capital	15.6%
Tier 1 capital	15.6%
Total capital	15.8%

#### 7.2 Capital requirements

The Bank's policy is to maintain a strong capital base so as to maintain investor, creditor and market confidence and to sustain future development of the business. The impact of the level of capital on shareholders' return is also recognised and the Bank recognises the need to maintain a balance between the higher returns that might be possible with greater gearing and the advantages and security afforded by a sound capital position.

The allocation of capital between specific operations and activities is, to a large extent, driven by optimisation of the return achieved on the capital allocated. The amount of capital allocated to each operation or activity is based primarily upon the regulatory capital, but in some cases the regulatory requirements do not reflect differing risk profiles, subject to the overall level of capital to support a particular operation or activity not falling below the minimum required for regulatory purposes. The process of allocating capital to specific operations and activities is undertaken independently of those responsible for the operation.

Although maximisation of the return on risk-adjusted capital is the principal basis used in determining how capital is allocated within the Bank to particular operations or activities, it is not the sole basis used for decision making. Account is also taken of synergies with other operations and activities, the availability of management and other resources, and the fit of the activity with the Bank's long-term strategic objectives. The Bank's policies in respect of capital management and allocation are reviewed regularly by the Board of Directors.

As outlined previously, minimum capital requirements are calculated for credit, market and operational risks. The Bank utilises the Standardised Approach for credit risk, the Basic Indicator Approach for operational risk and the Basic Method for foreign exchange risk in order to calculate the Pillar 1 minimum capital requirements. As disclosed previously, for credit risk, under the standardised approach risk weights are determined according to credit ratings provided by internationally recognised credit agencies such as Fitch or their equivalents and by using the applicable regulatory risk weights for unrated exposures. Capital charge for foreign exchange risk using the Basic Method is calculated at 8% of the higher of the sum of all the net short positions and the sum of all the net long positions in each foreign currency. The Basic Indicator Approach requires that the Bank allocates capital for operational risk by taking 15% of the average gross income.

The total capital ratio is calculated using the definition of regulatory capital and risk-weighted assets. As required by the CRR, the minimum level of the Capital Requirements Ratio stands at 8%. The Capital Requirements Ratio expresses own funds as a proportion of risk weighted assets and off-balance sheet items, together with notional risk weighted assets in respect of operational risk and market risk. Total risk-weighted assets are determined by multiplying the capital requirements for market risk and operational risk by 12.5 (i.e. the reciprocal of the minimum capital ratio of 8%) and adding the resulting figures to the sum of risk-weighted assets for credit risk.

The Bank will be fully implementing the CRD IV capital requirements with effect from January 2019. In this respect, Banking Rule BR/15: 'Capital Buffers of Credit Institutions authorised under the Banking Act, 1994', will require additional buffers, namely the 'capital conservation buffer', the 'countercyclical buffer', 'other systemically important institutions (O-SII) buffer' and the 'systemic risk buffer'. Automatic restrictions on capital distributions apply if the local group's CET1 capital falls below the level of its CRD IV combined buffer.

The Bank will be required to maintain a capital conservation buffer of 2.5%, made up of CET1 capital, on the risk weighted exposures of the Bank as from 1 January 2019. This buffer is being phased-in over the period from 1 January 2016 to 31 December 2018.

#### 7.2 Capital requirements - continued

CRD IV contemplates a countercyclical buffer in line with Basel III, in the form of an institution-specific countercyclical buffer and the application of increased requirements to address macro-prudential or systemic risk. This is expected to be set in the range of 0-2.5% of relevant credit exposure RWAs, whereby the rate shall consist of the weighted average of the 'countercyclical buffer' rates that apply in the jurisdiction where the relevant exposures are located. The Bank's countercyclical capital buffer requirement as at 31 December 2016 amounted to US\$7,140 in respect of general credit exposures of US\$446,250 in Norway, for which a countercyclical buffer rate of 1.5% is being applied, in line with the buffer rates published by the European Systemic Risk Board.

The O-SII buffer is also institution specific and may be set at a maximum of 2% of an systemically important institution's total risk exposure amount. Given the Bank's position as a non-core domestic bank, in terms of its systematic relevance to the financial system in Malta, it is unlikely that the Bank will be required to maintain an O-SII buffer.

In addition to the measures above, CRD IV sets out a 'systemic risk buffer' for the financial sector as a whole, or one or more sub-sectors, to be deployed as necessary by each EU member state with a view to mitigating structural macroprudential risk. The 'systemic risk buffer' may range between 0% and 5%. There are currently no indications that the Bank will need to maintain a systemic risk buffer.

Additionally, since the Bank advances loans to borrowers in different geographical regions, it may be required to maintain a 'countercyclical buffer'. This is expected to be set in the range of 0-2.5%, whereby the rate shall consist of the weighted average of the 'countercyclical buffer' rates that apply in the jurisdiction where the relevant exposures are located.

#### 7.2 Capital requirements - continued

The Bank's capital requirements and Total capital ratio computation are as follows:

At 31 December 2016	Exposure value US\$	Risk weighted assets US\$	Capital required US\$
Central governments or central banks Public sector entities Institutions Corporates Exposures in the form of units or shares in CIUs Other items	9,050,816 1,637,205 27,415,029 104,194,977 11,609,537 2,567,333	1,331,795 327,441 14,258,022 107,338,410 11,609,537 2,763,783	94,475 26,195 1,140,642 8,587,073 928,763 221,103
Credit risk Foreign exchange risk Operational risk	156,474,897	<b>137,478,125</b> 3,003,759 17,137,069	10,998,251 240,301 1,370,966
Total capital required	•	157,618,953	12,609,518
Own funds Common Equity Tier 1 capital Tier 2 capital	•		24,616,456 254,319
Total own funds			24,870,775
Total capital ratio			15.8%

#### 7.3 Internal Capital Adequacy Assessment Process (ICAAP)

The Bank considers the Internal Capital Adequacy Assessment Process (ICAAP) embedded in Pillar II as a tool that ensures a proper measurement of material risks and capital and allows better capital management and an improvement in risk management. Therefore it facilitates a better alignment between material risks and regulatory capital in order to have better capital deployment and improvements in the risk management and mitigation techniques adopted by the Bank. The ICAAP as required by the MFSA Banking Rule 12 is performed on an annual basis.

Therefore ICAAP is a process that the Bank utilises to ensure that:

- there is adequate identification, measurement, aggregation and monitoring of the Bank's risks;
- adequate internal capital is held by the institution in relation to its risk profile; and
- the Bank uses sound risk management systems and there is the intention to develop them further.

The Board and the Bank's Executive Team take overall responsibility for the conceptual design and technical details of the ICAAP document. Apart from the responsibility for the conceptual design, the Board discusses, approves, endorses and delivers the yearly ICAAP submission. The Bank's independent risk oversight function is involved in the ICAAP with a view to ensuring that the process reflects and takes cognisance of the Bank's risk management activities and processes.

# 7.3 Internal Capital Adequacy Assessment Process (ICAAP) - continued

The ICAAP is a revolving management tool which starts with defining risk strategy, identifying, quantifying and aggregating risks, determining risk-bearing ability, allocating capital, establishing limits and leads to ongoing risk monitoring. The individual elements of the tool are performed with varying regularity. All the activities described in the circuit are examined at least once a year to ensure that they are up to date, adequate and also adjusted to current underlying conditions when necessary.

The process involves a quantitative assessment of individual types of risk and an assessment of the existing methods and systems for monitoring and managing risk (qualitative assessment). The risk assessment concept is used as a scoring procedure, thus providing a comprehensive overview of the risk profile of the Bank.

The basis for the quantitative implementation of the ICAAP is the risk bearing capacity calculation which demonstrates that adequate capital is in place at all times to provide sufficient cover for risks that have been entered into and which also ensures such cover is available for the future. The Bank's ICAAP is based upon a "Pillar 1 Plus" approach whereby the Pillar 1 capital requirement for credit and operational requirements is supplemented by the capital allocation for other material risks not fully addressed within Pillar 1. The risks considered for ICAAP include concentration, liquidity, reputational and strategic risks, interest rate risk in the banking book, and risks arising from the macroeconomic environment.

The Bank's ICAAP contains three year projections as well as the capital plan, and the Board monitors that there are adequate capital resources to support the corporate goals contained within the plan and the associated risks.

The Bank covers the Pillar 2 capital requirements through stress testing processes to forecast the Bank's projected capital requirements and resources in a range of stress scenarios. This enables the Bank to guarantee that it can meet its minimum regulatory capital requirements in a stressed environment.

# 8. Remuneration policy

The Board of Directors performs the functions of the Remuneration Committee.

None of the directors, in their capacity as directors of the Bank, are entitled to profit sharing, share options, pension benefits or any other remuneration from the Bank. The Bank has two directors that are employees of the Bank. These two directors are part of the Bank's senior management and receive an annual bonus payable based on an assessment of one's overall performance during the previous financial year.

The Board of Directors considers that the packages offered to senior management ensure that the Bank attracts and retains management staff that is capable of fulfilling its duties and obligations. Furthermore, it is the Bank's policy to engage its senior management staff on the basis of indefinite contracts of employment after a period of probation, rather than on fixed term contracts. Accordingly, the applicable notice periods, after probation, are those provided for in the relevant legislation.

Share options and profit sharing do not feature in the Bank's processes and the individual contracts of employment of employees within the Bank do not contain provisions for termination payments and/or other payments linked to early termination other than as determined by Law. Currently no pension benefits are payable by the Bank.

As required in terms of article 451 of the CRR, individuals have been identified as Material Risk Takers ('MRTs') based on qualitative and quantitative criteria set out in the Regulatory Technical Standard EU 604/2014 that came into force in June 2014. In addition to the Non-Executive Directors, the Bank's MRTs consist of six senior management staff members including two Executive Directors.

Senior management staff members, consisting of six officials and including executive directors, are eligible for annual salary increases but such increases are not directly related to the financial performance of the Bank. An annual bonus is payable based on an assessment of one's overall performance during the previous financial year. Bonus payments do not exceed 100% of the fixed component of the total remuneration for each individual.

Total emoluments received by senior management, including Executive Directors, during the period under review are as detailed below:

Fixed Remuneration	Variable Remuneration
US\$939,326	Nil

Total Non-Executive Directors' fees attributable for the financial year ended 31 December 2016 amounted to US\$90,737 (2015: US\$76,041).

#### 9. Leverage

The leverage ratio is a regulatory and supervisory tool intended to provide a transparent and nonrisk based measurement of an institution to supplement the risk-based capital requirements. This tool has been introduced to deter any possible build-up of excessive leverage, a main factor during the banking crisis in 2008. The leverage ratio measures the relationship between the Bank's capital resources and its total assets.

The leverage ratio is calculated on a three-month average of capital as a proportion of total exposures. Capital is defined as Tier 1 capital in line with Article 25 of the CRR, whilst total exposure relates to the total on and off balance sheet exposures less the deductions applied to Tier 1 capital. The Bank does not apply transitional provisions when determining its Tier 1 capital in respect of the leverage ratio calculation, as described in Article 499(1) and 499(2) of the CRR.

During 2016, the European Commission published a Proposal to amend Regulation 575/2013 (CRR), which included the introduction of a 3% leverage ratio as a binding Pillar I requirement. Although this Proposal is still in draft and further discussions are expected, the Bank complies with the 3% leverage ratio based on fully-transitioned Basel III standards.

The following is the Bank's estimated leverage ratio, determined in accordance with the requirements stipulated by implementing regulation EU 2016/200.

Leverage ratio	15.8%
Tier 1 capital  Total exposure measure for the purposes of the leverage ratio	24,616,456 156,217,987
	2016 US\$

The total exposure measure for the purposes of the leverage ratio has been determined as follows:

	2016 US\$
On-balance sheet exposures (excluding derivatives) On-balance sheet items (excluding derivatives) Asset amounts deducted in determining Tier 1 capital	154,109,412 (1,130,948)
On-balance sheet exposures (excluding derivatives and SFTs)	152,978,464
Derivative exposures  Replacement cost associated with all derivative  Derivatives exposures at gross notional amount  Adjustments for PFE associated with derivative transactions	188,577 62,433,315 (61,808,982)
Derivative exposures	812,910
Off-balance sheet exposures Off-balance sheet exposures at gross notional amount Adjustments for conversion to credit equivalent amounts Off-balance sheet exposures	5,524,573 (3,097,950) <b>2,426,613</b>

### 9. Leverage - continued

The following table provides a reconciliation of accounting assets and leverage ratio exposures.

	2016
Total assets as per published financial statements	154,109,412
Adjustments for derivative instruments	812,910
Adjustment for off-balance sheet items	2,426,613
Other adjustments	, ,
Deduction for intangible assets	(61,127)
Adjustment for unrealised gains	(254,319)
Adjustment for Depositor Compensation Scheme	(815,502)
Leverage ratio exposure	156,217,987

The table below shows the different on balance sheet exposures in relation to the calculation of the leverage ratio.

2016	
US\$	

# Total on-balance sheet exposures (excluding derivatives and intangible assets), of which:

152,978,464

Exposures treated as sovereigns	9,050,816
Exposures to public sector entities	1,637,205
Institutions	27,415,029
Corporates	104,194,977
Other exposures	10,680,437

#### 10. Asset encumbrance

The disclosure on asset encumbrance is a requirement introduced in Banking Rule 07 transposing the provisions of the EBA Guidelines on Disclosure of Encumbered and Unencumbered Assets (EBA/GL/2014/03).

The objective of this disclosure is to facilitate an understanding of available and unrestricted assets that could be used to support potential future funding and collateral needs. An asset is defined as encumbered if it has been pledged as collateral against an existing facility, and as a result is no longer available to the Bank to secure funding, satisfy collateral needs or be sold to reduce the funding requirement.

The disclosure is not designed to identify assets which would be available to meet the claims of creditors or to predict assets that would be available to creditors in the event of a resolution or bankruptcy.

#### 10. Asset encumbrance - continued

The disclosure on asset encumbrance is a requirement introduced in Banking Rule 07 transposing the provisions of the EBA Guidelines on Disclosure of Encumbered and Unencumbered Assets (EBA/GL/2014/03).

Encumbered and unencumbered assets

	Carrying amount of encumbered assets 2016 US\$	Fair value of encumbered assets 2016 US\$	Carrying amount of unencumbered assets 2016 US\$	Fair value of unencumbered assets 2016 US\$
Financial assets designated as at fair value through profit or				
loss	4,774,708	4,774,708	6,834,829	6,834,829
Debt instruments	8,880,619	8,880,619	17,411,587	17,411,587
Loans and advances to banks	2,593,341	-	18,086,103	-
Other assets	-	-	95,528,225	-
	16,248,668	13,655,327	137,860,744	24,246,416

The encumbered assets consist of:

- pledged securities in favour of Central Bank of Malta for the purposes of the Bank's participation in the European Central Bank's open market operations;
- pledged cash balances and securities in support of the Bank's OTC derivative transactions with counterparties; and
- units held by the Bank in a money market fund pledged as collateral in favour of another credit institution for the purpose of establishing a credit line.

The unencumbered assets disclosed in the preceding table under 'Other assets' include cash and short term funds, loans and advances to customers, property, plant and equipment, tax assets and other assets.

The Bank continues to recognise these encumbered assets since all the risks and rewards of the assets will be substantially retained in a manner that does not result in the encumbered assets being derecognised for accounting purposes.

The Bank does not encumber and of the collateral received.

	Matching liabilities, contingent liabilities or securities lent 2016 US\$	Assets and collateral received 2016 US\$
Carrying amount of selected financial liabilities	1,374,781	7,810,651

### 11. Other directorships

According to the 'Guide to banking supervision' issued by the European Central Bank in November 2014, a credit institution will be considered significant if any one of the following conditions is met:

- the total value of its assets exceeds €30 billion or unless the total value of its assets is below €5 billion exceeds 20% of national GDP;
- it is one of the three most significant credit institutions established in a Member State;
- it is a recipient of direct assistance from the European Stability Mechanism; or
- the total value of its assets exceeds €5 billion and the ratio of its cross-border assets/liabilities in more than one other participating Member State to its total assets/liabilities is above 20%.

IIG Bank (Malta) Ltd does not meet any of the above criteria, and therefore is currently not considered significant by banking supervisors. Accordingly, the Bank is exempt from the requirements of article 91 of CRD IV.

The number of other directorships held by the members of the Bank's Board of Directors are listed in the table below:

Director	Position	Number of other directorships held
Raymond Busuttil	Executive Director	12
James Douglas Nelson	Non-Executive Director	-
Joseph Grioli	Non-Executive Director	22
David Hu	Non-Executive Director	2
Martin Silver	Non-Executive Director	1
Karl Vella	Executive Director	-

For the purpose of the above disclosure, the number of other directorships held within the same group are counted as a single directorship.

#### 12. Recruitment and diversity policy

The Bank is aware that a vigorous and professional approach to recruitment and selection of prospective members of the Board of Directors and management or other employees within the Bank helps it to attract and appoint those individuals having the necessary skills and attributes compatible with achieving the Bank's overall objectives. Thus, the Bank ensures that appointments at all levels made within the Bank are based on each individual's knowledge, skills, expertise and merit, as required by Maltese legislation and in line with policy.

The Bank undertakes a rigorous selection process for all prospective members of the Board and management together with other employees, bearing in mind the key activities, tasks and skills required for the vacant position. As part of the selection process, multiple interviews are conducted, during which the individual's knowledge, experience, skills and competency are evaluated against those of other individuals.

# 12. Recruitment and diversity policy - continued

Bearing its objectives in mind, the Bank endeavours to appoint directors with diverse skills and expertise that allow the Board to create value for shareholders by ensuring that the specific risks pursued by the Bank in trade finance as well as risks that are intrinsic to banking business in general are appropriately managed and mitigated within the Board's approach. The Bank will continue to promote this diversity by recruiting the ideal individual for the vacant position, regardless of the individual's gender, race, family, disability, sexual orientation, identity or preference.

# **Five Year Summary**

# Statement of financial position

	2016 US\$				
ASSETS				•	•
Cash and balances with Central Bank of Malta Financial assets designated as at fair value	3,869,089	679,867	582,403	315,371	152,983
through profit and loss Financial assets classified as available-for-sale	11,609,537 26,292,206				55,183 26,212,281
Derivative financial instruments	-	-	-	863,705	555,156
Loans and advances to banks	20,679,444		38,744,200		
Loans and advances to customers	89,031,527		•		
Property, plant and equipment	148,669	•	92,572		104,036
Intangible assets	61,127	,	97,591	103,185	103,916
Deferred tax assets	131,534		-	-	-
Accrued income and other assets	2,286,279	2,751,330	2,580,879	1,752,689	1,787,559
Total assets	154,109,412	192,789,076	156,319,132	110,972,123	78,447,849
EQUITY AND LIABILITIES Equity					
Share capital	22,500,000	16,300,000	13,735,000	12,765,000	11,847,000
Fair value reserve	377,085		4,601,853	1,404,008	582,456
Reserve for General Banking Risk	14,790	-	-	-	· <u>-</u>
Retained earnings	2,855,529	4,302,229	1,805,511	666,315	654,799
Total equity	25,747,404	23,442,330	20,142,364	14,835,323	13,084,255
Liabilities					
Amounts owed to customers	120,670,756	143,670,301	112,231,553	80,987,848	43,713,009
Amounts owed to banks	3,350,010	19,463,207	17,535,655	12,464,565	20,278,885
Derivative financial instruments	1,374,781	1,380,322	1,810,412	-	-
Current tax liabilities	1,860,218	2,313,319		355,644	332,268
Deferred tax liabilities	-	1,502,475	2,471,041	767,432	322,384
Other liabilities	1,106,243	1,017,122	1,098,067	1,561,311	717,048
Total liabilities	128,362,008	169,346,746	136,176,768	96,136,800	65,363,594
Total equity and liabilities	154,109,412	192,789,076	156,319,132	110,972,123	78,447,849
MEMORANDUM ITEMS					
Commitments	6,244,152	3,067,612	2,193,927	1,674,559	785,501

# **Five Year Summary**

# Statement of comprehensive income

	2016 US\$			2013 US\$	2012 US\$
Interest and similar income Interest and similar expense	8,408,071 (2,891,888)	8,457,980 (3,374,071)		5,841,327 (2,651,176)	– .
Net interest income	5,516,183	5,083,909	3,313,030	3,190,151	2,942,378
Fee and commission income Fee and commission expense	1,538,090 (725,047)		-	128,504 (510,179)	7,467 (447,674)
Net fee and commission income	813,043	556,185	160,828	(381,675)	(440,207)
Net trading gains/(losses) Gains on disposal of available-for-sale financial assets	(339,696) 5,395,295	•	790,583 2,271,086	(156,420) 113,061	52,789 -
Operating income	11,384,825	9,498,958	6,535,527	2,765,117	2,554,960
Net impairment charges Administrative expenses		(327,713) (2,627,452)		- (1,759,207)	- (1,623,378)
Profit before tax		6,543,793			931,582
Tax expense	(1,549,276)	(2,292,075)	(1,033,203)	(364,970)	(337,577) ————
Profit for the period	2,818,090	4,251,718	1,805,511	640,940	594,005
Other comprehensive income:  Items that may be subsequently reclassified to profit or loss  Fair valuation of available-for-sale financial assets:					
Net changes in fair value arising during the period, before tax Reclassification adjustments – net amounts	1,606,039	509,941	7,190,848	1,376,988	796,295
reclassified to profit or loss, before tax Income tax relating to components of other	(5,395,295)	(3,220,329)	(2,271,086)	(113,061)	-
comprehensive income	1,326,240	948,636	(1,721,917)	(442,375)	(278, 703)
Other comprehensive income for the period, net of tax	(2,463,016)	(1,761,752)	3,197,845	821,552	517,592
Total comprehensive income for the period	355,074	2,489,966	5,003,356	1,462,492	1,111,597

# **Five Year Summary**

# Statement of cash flows

	2016 US\$				2012 US\$
Operating activities	000	000	000	ΟΟψ	<b>Ο</b> Οψ
Interest and commission income received	10,691,842	9,597,779	6,986,530	6,172,536	4,068,785
Interest and commission expense paid	(3,715,806)	(3,741,699)			. ,
Net income from foreign exchange transactions	1,040,671		10,012,087		(1,921,143)
Tax paid	(2,310,146)	(1,028,726)	(377,115)	(338,921)	(134,934)
Cash payments to employees and suppliers	(2,758,990)	(2,439,664)	(2,822,374)	(1,061,122)	(1,594,634)
Cash flows generated from operating activities before changes in operating assets and liabilities	2,947,571	6,245,391	9,665,953	(338,352)	(1,278,813)
Changes in operating assets and liabilities:					
Net increase in balances with Central Bank of Malta Net decrease/(increase) in loans and advances to banks	(27,007)	(97,931)	(267,155)	(160,726)	(123,991)
Net increase in amounts attributable to DCS	(939,905) (160,296)		(6,370,136)		(90,904)
Net increase in loans and advances to customers		(159,532) (21,306,262)	(189,782) (28 533 840)	(200,373) 12,906,311	14,335,286)
Net increase in amounts owed to customers	(10,001,110)	(21,000,202)	(20,000,040)	12,000,011	17,000,200)
Mat Construction and the Lands	(23,000,583)	31,426,969	14,702,633	33,654,808	24,616,881
Net increase in amounts owed to banks	(16,113,197)	1,927,552	3,369,000	(7,814,320) 	13,780,414
Net cash generated from operating activities	(48,250,836)	20,605,399	(7,623,327)	35,096,249	22,568,301
Investing activities					
Purchase of available-for-sale investments	(46,732,962)	(31,537,614)	(26,442,921)	(18,185,461)	(17,850,313)
Purchase of investments at fair value through profit or loss	(9,218,300)	(2,790,250)	(8,125,350)	(3,044,507)	-
Proceeds from disposal and redemption of available-for-sale investments	67,024,392	34,503,826	21,097,645	1,677,172	
Proceeds of disposal of investments at fair value through	07,027,032	04,000,020		1,077,172	_
profit or loss Purchase of property, plant and equipment	- /22 210\	544,567	10,266,736	- (04.774)	(40.004)
Purchase of intangible assets	(33,319) (18,202)	(106,690) (23,712)	(58,578) (40,341)	(24,774) (37,834)	(19,604)
. distinct of many six accord		(20,7 12)	(+0,0+1)	(07,004)	
Net cash generated by/(used in) investing activities	11,021,609	590,127	(3,302,809)	(19,615,404)	(17,869,917)
Financing activities				<del> </del>	
Issue of ordinary share capital	6,200,000	2,565,000	970,000	918.000	345,000
Dividends paid to equity holders	(4,250,000)		(666,315)	(629,424)	(236,334)
Net cash generated from financing activities	1,950,000	810,000	303,685	288,576	108,666
Net movement in cash and cash equivalents	(35,279,227)	22,005,526	(10,622,451)	15,769,421	4,807,050
Cash and cash equivalents at beginning of year	50,468,441	28,462,915	24,319,184	8,549,763	3,742,713
Cash and cash equivalents at end of year	15,189,214	50,468,441	13,696,733	24,319,184	8,549,763

