

AL SALAM BANK-BAHRAIN B.S.C. BASEL III - PILLAR III DISCLOSURES 31 December 2018

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31 December 2018

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BASEL III - PILLAR III - DISCLOSURES

31 December 2018

1 Introduction

The Central Bank of Bahrain ("CBB") requirements, which act as a common framework for the implementation of the Basel III accord in the Kingdom of Bahrain came into effect on 1 January 2015.

The Basel III accord is built on three pillars:

- Pillar I deals with the basis for the computation of the regulatory capital adequacy ratio. It defines the calculation of Risk Weighted Assets (RWAs) for credit risk, market risk
 and operational risk, as well as the derivation of the regulatory capital base. The capital adequacy ratio is then calculated as the ratio of the Bank's regulatory capital to its total
 RWAs.
- Pillar II involves the process of supervisory review of a financial institution's risk management framework and its capital adequacy.
- Pillar III relates to market discipline and requires the Bank to publish detailed qualitative and quantitative information of its risk management and capital adequacy policies and
 processes to complement the first two pillars and the associated supervisory review process.

The disclosures in this document are in addition to the disclosures included in the consolidated financial statements which are prepared in accordance with Financial Accounting Standards issued by Accounting and Auditing Organization for Islamic Financial Institutions and in conformity with the Bahrain Commercial Companies Law and the Central Bank of Bahrain and Financial Institutions Law, the CBB Rule Book (Volume 2) and relevant CBB directives.

2 Financial Performance and Position

The Bank was incorporated on 19 January 2006 in the Kingdom of Bahrain. The Bank operates under Islamic Shari'a principles in accordance with the regulatory requirements for Islamic banks set by the CBB. The Bank's ordinary shares are listed in the Bahrain Bourse and Dubai Financial Market and operates under an Islamic retail banking license issued by CBB.

On 30 March 2014, the Bank acquired 100% stake in BMI Bank B.S.C.(c) ("BMI"), a closed shareholding company in the Kingdom of Bahrain, through exchange of shares. During January 2015, the Shari'a Supervisory Board approved BMI Bank to be an Islamic bank effective 1 January 2015. BMI Bank's operations are in compliance with Shari'a principles effective 1 January 2015.

On 29 November 2016, the shareholders of BMI resolved to approve the transfer of the operations of BMI to the Bank. The transfer of business was approved by the CBB on 17 April 2017 which was subsequently published in the official gazette dated 20 April 2017. The Bank has transferred majority of the BMI's rights and assumed all of it's obligations at their respective carrying values.

During 2016, the Bank acquired 70% stake in Al Salam Bank Seychelles Limited ("ASBS"), (previously "BMIO") an offshore bank in Seychelles. ASBS operates under an offshore banking license issued by the Central Bank of Seychelles. BMIO used to operate under an offshore banking license issued by the Central Bank of Seychelles. From 20 May 2016, ASBS was granted a Banking Business License which permits onshore as well as offshore banking activities. All legal formalities in relation to the share allotment have been completed and the process of converting ASBS into fully compliant Islamic operations is in progress. In accordance with CA-B.1.4 of the CBB Rulebook, for the purpose of disclosure of risk weighted exposures and for capital adequacy calculation, the Bank has obtained an approval from the CBB to aggregate the risk weighted exposures of ASBS and hence, the risk weighted exposures of ASBS do not form part of all disclosures in this Basel III - Pillar III Disclosure Document.

During the year, the Group reassessed its involvement with an associate entity and its asset under management, ASB Biodiesel 1 ("Biodiesel"), a company incorporated in Cayman Islands with operations based on in Hongkong undertaking business of manufacturing biodiesel. The Group also had a significant financing exposure to Biodiesel. Based on the Groups ongoing involvement and support of the business and increase in variability of its exposure arising from the operations, it was assessed that the Group has obtained control over relevant activities of the Company in its capacity as principal. Accordingly the Group consolidated ASB Biodiesel and its subsidiaries (together "Biodiesel Group") effective 30 September 2018, being the deemed date of acquisition.

The Bank and its principal banking subsidiary operates through 10 branches in the Kingdom of Bahrain and 1 branch in Seychelles and offer a full range of Shari'a-compliant banking services and products. The activities of the Bank includes managing profit sharing investment accounts, offering Islamic financing contracts, dealing in Shari'a-compliant financial contracts as principal / agent, managing Shari'a-compliant financial contracts and other activities permitted for under the CBB's Regulated Islamic Banking Services as defined in the licensing framework. The Bank together with its subsidiaries are referred to as the "Group".

The consolidated financial statements and capital adequacy regulatory disclosures of the Group have been prepared on a consistent basis where applicable.

Table 2.1 Key Financial Indicators (PD 1.3.9 a,b,c)

						(BD '000s)
	Dec-2018	Dec-2017	Dec-2016	Dec-2015	Dec-2014	Dec-2013
Total operating income	56,719	62,190	63,000	58,898	46,068	26,087
Net profit	18,520	18,055	16,096	10,548	15,821	12,372
Total assets	1,710,310	1,589,228	1,681,293	1,656,643	1,955,297	1,088,252
Total equity	304,822	303,837	324,899	320,002	328,803	246,097
Key Ratios	Dec-2018	Dec-2017	Dec-2016	Dec-2015	Dec-2014	Dec-2013
Earnings per share (fils)	8.7	8.5	7.6	5.8	8.0	8.3
Return on average assets (%)	1.1	1.1	1.0	0.6	1.0	1.2
Return on average equity (%)	6.1	5.7	5.0	3.3	5.5	5.4
Cost to operating income (%)	44.0	39.0	41.4	44.7	57.3	43.7
Dividend payout ratio (%)	81.0	83.0	66.5	86.2	67.7	60.5
Dividend yield ratio (%)	7.0	6.1	4.2	5.4	3.8	3.6
Net profit margin on Islamic assets (%)	2.9%	3.2%	2.7%	3.3%	2.8%	2.6%

2 Financial Performance and Position (continued)

Table 2.2 Financial Summary

(BD '000s)

Consolidated Financial Position	Dec-2018	Dec-2017	Dec-2016	Dec-2015	Dec-2014	Dec-2013
Cash and balances with banks and Central Bank	82,587	66,351	131,990	152,572	277,751	86,097
Sovereign Sukuk	354,215	363,569	358,269	350,474	145,789	102,937
Placements with financial institutions	163,305	141,225	182,452	103,345	182,110	118,227
Corporate Sukuk	9,222	10,419	28,934	50,472	88,193	91,106
Financing assets	568,905	532,535	478,798	491,353	470,880	289,371
Finance lease assets	256,892	213,238	188,485	155,217	141,052	110,631
Non-trading investments	107,508	111,325	122,073	123,514	147,096	125,923
Investment properties	74,261	66,782	51,863	68,786	65,149	66,718
Development properties	6,290	6,448	17,781	49,021	59,262	65,891
Investment in associates	15,972	16,835	10,561	9,994	10,492	8,537
Other assets	45,182	34,530	64,276	75,924	341,552	22,814
Goodwill	25,971	25,971	25,971	25,971	25,971	-
Assets classified as held-for-sale	-	-	19,840	-	-	-
Placements from financial institutions	144,125	154,765	132,032	120,795	121,266	106,796
Placements from customers	705,924	602,784	723,439	842,570	1,034,052	584,365
Customer current accounts	251,842	283,886	279,609	224,366	226,648	70,532
Murabaha term financing	155,543	79,986	91,837	35,986	21,337	23,637
Other liabilities	48,293	45,089	49,260	50,573	195,039	30,979
Liabilities relating to assets classified as held-for-sale	-	-	11,421	-	-	-
Equity of Investment Accountholders (EOIA)	99,761	118,881	68,796	62,351	28,152	25,846
Capital	Dec-2018	Dec-2017	Dec-2016	Dec-2015	Dec-2014	Dec-2013
Capital adequacy (%)	20.6	21.4	21.6	20.1	18.7	21.4
Equity/total assets (%)	17.8	19.1	19.3	19.3	16.8	22.6
Total customer deposits/equity (times)	3.5x	3.3x	3.3x	3.5x	4.3x	2.8x
Liquidity and Other Ratios	Dec-2018	Dec-2017	Dec-2016	Dec-2015	Dec-2014	Dec-2013
Islamic financing contracts/total assets (%)	48.3	46.9	39.7	39.0	31.3	36.8
Investments/total assets (%)	33.2	36.2	36.2	39.4	26.4	42.4
Liquid assets/total assets (%)	35.1	35.9	40.0	36.6	31.7	28.2
Liquid assets/Current and URIA deposits (%)	170.7	141.8	193.1	211.5	237.7	318.8
Customer Deposits/ Total assets (%)	61.8	63.3	63.8	68.2	65.9	62.6
Due from banks and financial institutions/ Total Assets (%)	9.5	8.9	10.9	6.2	9.3	10.9
Interbank Assets/ Interbank Liabilities	113.3	91.3	138.2	85.6	150.2	110.7
Islamic financing contracts/customer deposits (%)	78.1	74.2	62.3	57.3	47.5	58.8
Number of employees	341.0	322.0	333.0	368.0	457.0	191.0

3 Group and Capital Structure

3.1 Group Structure
The consolidated financial statements for the year comprise of the financial statements of the Bank and its subsidiaries (together referred to as "the Group") as at 31 December 2018.
The principal subsidiaries and associates as at 31 December 2018 and their treatment for capital adequacy purposes are as follows:

Subsidiary	Entity classification as per CA	
- Canonalary	Module	Bank
Al Salam Bank Seychelles	Banking subsidiary	Aggregation of risk weighted assets approved by the CBB on 28 June 2016
Kenaz Al Kadam Real	Commercial entity	
Estate Investment WLL(ii)	Commercial entity	
Kenaz Al Hamala Real	Commercial entity	Risk weighting of
Estate Investment WLL(ii)	Commercial entity	investment
Wahat Al Muharraq Real	Commercial entity	exposure
Estate Investment WLL(ii)	Commercial entity	exposure
Burj Al Qurb(ii)	Commercial entity	
ASB Biodiesel 1	Commercial entity	
Associates		
Al Salam Bank Algeria	Financial entity	
Gulf African Bank	Financial entity	
CSQ 1 Property Unit Trust		
Manara Development		
Company BSC (c)		
NS Real Estate Company		Risk weighting of
WLL ⁽ⁱⁱ⁾	Commercial entity	investment
Burj Al Jewar ⁽ⁱⁱ⁾	•	exposure
Darari Investment Co		
WLL ⁽ⁱⁱ⁾		
Burj Al Safwa ⁽ⁱⁱ⁾		
Al Salam Global REIT		

3.2 Capital Structure

The Group's total capital of BD 290,332 thousands comprises of CET 1, AT1 and Tier 2 capital which is detailed in the following table: (PD 1.3.11)

The issued and paid up share capital of the Group was BD 214,093 thousands at 31 December 2018, comprising of 2,140,931 thousand shares of BD 0.100 each. (PD 1.3.11)

The management believes that the current capital structure addresses the current and future activities of the Group **Table 3.1** Breakdown of the Bank's Capital Base (PD 1.3.12, 13, 14, 15, 16)

(BD '000s) CET1 Issued and fully paid up ordinary shares 214,093 Treasury shares (3.855) Legal/statutory reserves 18.998 Share premium 12.209 Retained earnings 5,219 Current interim cumulative net income / losses 18,499 Unrealized gains and losses on available for sale financial 199 Gains and loss resulting from converting foreign currency (3 195) Unrealized gains and losses arising from fair valuing equities 18.383 Total Minority Interest in banking subsidiaries given recognition in 182 Total CET1 capital prior to regulatory adjustments 280,732 Less: Goodwill (25.971

General financing loss provisions			11,952			
Total Available AT1 & T2 Capital		13	35,557			
Total Tier 1		254,774				
Total Capital (PD 1.3.20 a)			290,332			
Table 3.2	Risk W	(BD '000 Risk Weighted Exposures				
		Operational				
Risk Weighted Exposures (self-financed)	1,294,727	100,699	2,306			
Risk Weighted Exposures (URIA)	6,886	-	-			
A second in a f Diel Wainhard Francisco	0.070	C44				
Aggregation of Risk Weighted Exposures	2,878	644	-			

	CET 1	T1	Total
			Capital
% of Total Risk Weighted Exposures (CAR) (PD 1.3.20 a)	18.09%	18.09%	20.62%
Minimum Required by CBB Regulations under Basel III (before CCB)	6.50%	8.00%	10.00%
Capital Conservation Buffer (CCB)	2.50%	2.50%	2.50%
Minimum Required by CBB Regulations under Basel III (after CCB)	9.00%	10.50%	12.50%

^{*} Calculated in accordance with Capital Adequacy Module of Volume 2 issued by the CBB. ASBS has not been considered as a significant subsidiary as the regulatory capital is less than 5% of the Group's consolidated capital base.

254,761

1,304,492

13

101,343

17

23,589

2,306 1,408,140

4 Capital Adequacy Ratios (CAR)

Risk Weighted Exposures after Aggregation

Total Risk Weighted Exposures

No impediments on the transfer of funds or reallocation of regulatory capital exist and the Group has adequate capital to support the current and future activities of the Group. (PD 1.3.6.c and PD 1.3.16)

4.1 Capital Management

Internal Capital Adequacy Assessment Process (ICAAP)

Total Common Equity Tier 1 capital after the regulatory

Instruments issued by banking subsidiaries to third parties

Asset revaluation reserve - Property, plant, and equipment

The Group's capital management aims to maintain an optimum level of capital to enable it to pursue strategies that build long-term shareholder value, whilst always maintaining minimum regulatory ratio requirements.

The key principles driving capital management include:

- Adequate capital is maintained as buffer for unexpected losses to protect stakeholders i.e. shareholders and depositors.
- Maximize return on capital and generate sustainable return above the cost of capital.

The adequacy of the Group's capital is monitored using, primarily, the rules and ratios established by the Basel Committee on Banking Supervision and adopted by the CBB. The primary objective of the Group's capital management is to ensure that it complies with externally imposed capital requirements. The Group complied in full with all externally imposed capital requirements during the year ended 31 December 2018.

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Profile of Risk-Weighted Assets and Capital Charge

The Group has adopted the standardized approach for credit risk and market risk and the basic indicator approach for operational risk for regulatory reporting purposes. The Group's risk-weighted capital requirement for credit, market and operational risks are given below.

Definition of exposure classes per Standard Portfolio (PD 1.3.21 a)

The Group has a diversified funded and unfunded credit portfolio. The exposures are classified as per the Standard portfolio approach mentioned under the CBB's Basel III capital adequacy framework covering the standardized approach for credit risk.

The descriptions of the counterparty classes along with the risk weights to be used to derive the risk weighted assets are as follows:

These pertain to exposures to governments and their central banks. Claims on Bahrain and GCC sovereigns are risk weighted at 0%. Claims on all other sovereigns are given a risk weighting of 0% where such claims are denominated and funded in the relevant domestic currency of that sovereign. Claims on sovereigns, other than those mentioned above are risk weighted based on their credit ratings.

b. Claims on public sector entities (PSEs)

Bahrain PSEs are assigned 0% risk weight. Other sovereign PSE's, in the relevant domestic currency and for which the local regulator has assigned risk weight as 0%, are assigned 0% risk weight by the CBB. PSEs other than those mentioned above are risk weighted based on their credit ratings.

c. Claims on banks

Claims on banks are risk weighted based on the ratings assigned to them by external rating agencies, however, short term claims on locally incorporated banks may be assigned a risk weighting of 20% where such claims on the banks are of an original maturity of three months or less and the claims are denominated and funded in either Bahraini Dinars or US Dollars.

Preferential risk weights that are one category more favorable than the standard risk weighting are assigned to claims on foreign banks licensed in Bahrain of an original maturity of three months or less denominated and funded in the relevant domestic currency. Such preferential risk weights for short-term claims on banks licensed in other jurisdictions are allowed only if the relevant supervisor also allows this preferential risk weighting to short-term claims on its banks.

No claim on an unrated bank would receive a risk weight lower than that applied to claims on its sovereign of incorporation. Significant investment in subordinated debt of banking, securities and financial entities are risk weighted at 250% and investments in excess of 15% of the Bank's CET1, then the excess amount will be deducted from the bank's capital.

d. Claims on corporate portfolio, including insurance companies

Claims on corporate portfolio including insurance companies are risk weighted based on credit ratings. Risk weightings for unrated corporate claims are assigned at 100%.

e. Claims on regulatory retail portfolio

Retail claims that are included in the regulatory retail portfolio are assigned risk weights of 75% (except for past due Islamic financing contracts), if it meets the criteria mentioned in the CBB's rule book.

f. Mortgages

Claims secured by mortgages on residential mortgage and commercial real estate are subject to a minimum of 35%, 75% and 100% risk weight respectively.

g. Past due receivables (PD 1.3.22 a)

The unsecured portion of the account receivables and lease payment receivables (other than a qualifying residential mortgage financing contract) that is past due for more than 90 days, is risk-weighted as follows (net of specific provisions and including partial write-offs):

- (a) 150% risk weight when specific provisions are less than 20% of the outstanding amount of the facility.
- (b) 100% risk weight when specific provisions are 20% or more of the outstanding amount of the facility.

h. Investment in securities and sukuk

Investments in listed equities are risk weighted at 100% while unlisted equities are risk weighted at 150%.

i. Holding of real estate

All other holdings of real estate by banks (i.e. owned directly, subsidiaries or associate companies or other arrangements such as trusts, funds or REITs) are risk-weighted at 200%. Investment in listed real estate companies and investment in unlisted real estate companies are risk-weighted at 300% and 400% respectively. Premises occupied by the Group are weighted at 100%

i. Other assets

These are risk weighted at 100%

5 Profile of Risk-Weighted Assets and Capital Charge (continued)

5.1 Credit Risk (continued)

Table 5.1 Funded and Unfunded Exposures

(BD '000s)

Contribution by Equity and Current Accounts									
Exposure type	Gross Credit	CRM	Net Credit	Risk-Weighted	Minimum Capital				
	Exposure		Exposure	Assets (RWA)	Charge				
Cash and balances with banks and Central Bank	79,495	-	79,495	9,498	1,187				
Sovereign Sukuk	352,934	-	352,934	4,945	618				
Placements with financial institutions	63,250	-	63,250	40,374	5,047				
Corporate Sukuk	9,242	-	9,242	9,242	1,155				
Murabaha financing	169,868	44,036	125,832	94,219	11,777				
Mudaraba financing	377,429	26,001	351,428	299,300	37,413				
Musharaka	24,781	-	24,781	24,664	3,083				
Credit Cards	3,399	-	3,399	2,836	354				
Finance lease assets	259,282	108,419	150,863	111,229	13,904				
Non-trading investments	108,970	-	108,970	420,826	52,603				
Investment properties	74,261	-	74,261	148,523	18,565				
Development properties	6,290	-	6,290	12,581	1,573				
Investment in associates	16,938	-	16,938	51,289	6,411				
Other assets	18,970	-	18,970	20,861	2,608				
Total funded exposures	1,565,108	178,456	1,386,653	1,250,385	156,298				
Contingent Liabilities & Commitments	56,915	-	56,915	44,343	5,543				
Total unfunded exposures	56,915	-	56,915	44,343	5,543				
Aggregation of Risk Weighted Exposures for AlSalam Bank	-	-	-	2,878	360				
Seychelles Limited									
Total exposures	1,622,024	178,456	1,443,568	1,297,606	162,201				

Contribution by Equity of Investment Accountholders									
Exposure Type	Gross Credit	CRM	Net Credit	Risk-Weighted	Minimum Capital				
	Exposure		Exposure	Assets (RWA)	Charge				
Placements with financial institutions	99,691	-	99,691	6,886	861				
Total funded exposures	99,691	-	99,691	6,886	861				
Contingent Liabilities & Commitments	-	-	-	-	-				
Total unfunded exposures	-	-	-	-	-				
Total exposures	99,691		99,691	6,886	861				

Note a: In accordance with the Public Disclosure requirements to disclose the regulatory capital requirements for credit risk under standardised approach, have been extracted from the workings prepared based on the Form PIRI submitted to the CBB by the Bank.

Note b: The gross credit exposure is arrived at after considering the following:

- inclusion of unfunded exposure (after CCF); and
- deduction of excess amount over maximum permitted large exposure limit.

Note c: The unfunded exposure before (CCF) as of 31 December 2018 is BD 121,613 thousands.

Profile of Risk-Weighted Assets and Capital Charge (continued)

Excessive risk concentration (PD 1.3.26 a)

Concentrations arise when a number of counterparties are engaged in similar business activities, or activities in the same geographic region, or have similar economic features that would cause their ability to meet contractual obligations to be similarly affected by changes in economic, political or other conditions. Concentrations indicate the relative sensitivity of the Group's performance to developments affecting a particular industry or geographical location.

In order to avoid excessive concentrations of risk, the Group's policies and procedures include specific guidelines to focus on country and counterparty limits and maintaining a diversified portfolio. Identified concentrations of credit risks are controlled and managed accordingly.

Following is the Gross credit exposure by Islamic financing contracts which represents the exposure on accounts receivable and lease payments receivable which are covered by eligible collateral: (PD 1.3.17) (PD 1.3.25 b, c)

Table 5.2 Gross Credit Exposures (PD 1.3.26 b)

(BD '000s)

				Eligible Collaterals Held (after appropriate haircuts) *					
Current Credit Exposure by Type of Islamic	Gross Positive Fair Value (Net of specific	Netting			Govt.				
Financing Contracts	provision)	Benefits				Guarantees	Real Estate	Total	
Murabaha financing	169,868	-	169,868	21,229	38,613	-	-	59,843	
Mudaraba financing	377,429	-	377,429	40,532	-	-	-	40,532	
Finance lease assets (Ijarah Muntahia									
Bittamleek)	259,282	-	259,282	1,896	-	-	170,331	172,227	
Musharaka	24,781	-	24,781	-	-	-	-	-	
Credit Cards	3,399	-	3,399	-	-	-	-	-	
Total	834,759		834,759	63,656	38,613	-	170,331	272,601	

Over and above the collateral, considered as eligible under the CA Module, the Bank maintains additional collateral in the form of mortgage of residential properties, corporate guarantees and other tangible assets, which could be invoked to claim the amount owed in the event of default.

Credit risk concentrations and thresholds

The first level of protection against undue credit risk is through country, industry and threshold limits, together with customer and customer bank credit limits, set by the Risk Committee. Credit exposure to individual customers or customer banks is then controlled through a tiered hierarchy of delegated approval authorities.

Single name concentrations are monitored on an individual basis. Under the CBB's single obligor regulations, banks incorporated in Bahrain are required to obtain the CBB's approval for any planned exposure to a single counterparty, or group of connected counterparties exceeding 15 percent of total capital

As at 31 December 2018, the Group's exposures in excess of 15% of the obligor limits to individual counterparties, and excluding Central Bank exposures were BHD nil thousands. (PD 1.3.23 f)

Table 5.3 Gross Credit Exposures (PD 1.3.23 a)

(BD '000s)

Contribution by Equity and Current Accounts						
Exposure Type	Gross	Average				
	Credit	Gross				
	Exposure	Credit				
		Exposure				
Cash and balances with banks and Central Bank	82,587	70,713				
Sovereign Sukuk	354,215	360,548				
Placements with financial institutions	63,544	57,303				
Corporate Sukuk	9,222	9,000				
Financing assets	568,905	541,772				
Finance lease assets	256,892	235,973				
Non-trading investments	107,508	109,648				
Investment properties	74,261	74,749				
Development properties	6,290	6,369				
Investment in associates	15,972	16,624				
Other assets	45,182	41,248				
Goodwill	25,971	25,971				
Total funded exposures	1,610,549	1,549,917				
Contingent Liabilities & Commitments	98,883	119,393				
Total unfunded exposures	98,883	119,393				
Total exposures	1,709,432	1,669,310				

Contribution by Equity of Investment Accountholders						
Exposure Type	Gross	Average				
	Credit	Gross				
	Exposure	Credit				
		Exposure *				
Placements with financial institutions	99,761	99,939				
Total funded exposures	99,761	99,939				
Contingent Liabilities & Commitments	-					
Total unfunded exposures	-	-				
Total exposures	99,761	99,939				

^{*} The Group has calculated the average gross credit exposures based on average quarterly balances.

Risk mitigation, collateral and other credit enhancements

The amount and type of collateral depends on an assessment of the credit risk of the counterparty. The types of collateral mainly include cash, lien on property and guarantees from banks. As at 31 December 2018, the collaterals eligible for CRM (after applying regulatory haircuts) amounted to BD 272,601 thousands.

Management monitors the market value of collateral, requests additional collateral in accordance with the underlying agreement, and monitors the market value of collateral obtained during its review of the adequacy of the allowance for impairment losses with respect to Murabaha and Ijarah facilities. The Bank also makes use of master netting agreements with counterparties where relevant. (PD 1.3.25 a)

The main types of guarantors include rated banks and other financial institutions and Sovereigns which are rated by ECAl's along with personal guarantees of the Board of Directors/key management personnel of the borrower and other high net worth individuals.

The Group obtains additional collateral as and when the value of the collateral originally obtained is assessed at lower than the minimum acceptable Loan to Value (LTV) ratio of collateral. Also, where the customer is not in a position to provide additional collateral, the Group in consultation with its legal department evaluates the available legal and contractual options.

The Group ensures that at the inception of the facility, third party valuation of the tangible collaterals is obtained and performs an annual review of the facility whereby the revised collateral valuation is obtained from the third party

In case of default, the Group will work with the counterparty to discuss how the outstanding facility can be settled. As a last resort, the counterparty's assets will be used to settle the outstanding obligation.

5 Profile of Risk-Weighted Assets and Capital Charge (continued)

5.1 Credit Risk (continued)

5.1.1 Geographical Distribution of Exposures

The exposures are allocated to individual geographic areas based on the country where the exposure risk specific to the facility exists. The Geographical distribution of exposures by exposure type (including financing contracts, non trading investments, investments in real estate, development property and investment in associates) and funded or unfunded by is as follows:

Table 5.4 (PD 1.3.23 b) (BD '000s)

Table 5.4 (PD 1.3.23 b) (BD 00									
Contribution by Equity and Current Accounts									
Exposure type	GCC	Arab World	Europe	Asia Pacific	North America	Others	Total		
	Countries								
Cash and balances with banks and Central Bank	48,563	12	16,581	244	13,766	3,421	82,587		
Sovereign Sukuk	347,991	-	-	2,665	-	3,559	354,215		
Placements with financial institutions	59,663	-	-	-	3,516	365	63,544		
Corporate Sukuk	7,310	-	-	1,912	-	-	9,222		
Financing assets	510,355	40,250	6,558	1	6	11,735	568,905		
Murabaha financing	109,885	40,246	6,557	ı	-	11,008	167,696		
Mudaraba financing	372,409	-	-	•	-	727	373,136		
Musharaka	24,767	-	-	ı	-	-	24,767		
Credit Cards	3,294	4	1	1	6	-	3,306		
Finance lease assets	256,555	-	-	•	-	337	256,892		
Non-trading investments	101,867	-	-	ı	358	5,283	107,508		
Investment properties	74,261	-	-	•	-	-	74,261		
Development properties	-	-	6,290	ı	-	-	6,290		
Investment in associates	-	6,546	5,963	•	-	3,463	15,972		
Other assets	17,247	-	8	24,794	-	3,133	45,182		
Goodwill	25,971	-	-	-	-	-	25,971		
Total funded exposures	1,449,783	46,808	35,400	29,616	17,646	31,296	1,610,549		
Contingent Liabilities & Commitments	91,015	7,099	34	736	-	-	98,883		
Total unfunded exposures	91,015	7,099	34	736	-	-	98,883		
Total exposures	1,540,798	53,907	35,434	30,352	17,646	31,296	1,709,432		

Table 5.5 (PD 1.3.23 b) (BD '000s)

	Contribution by Equity of investment account holders													
Exposure type GCC Arab World Europe Asia Pacific North America Others														
7	Countries													
Placements with financial institutions	99,761	-	-	-	-	-	99,761							
Total funded exposures	99,761	-	-	-	-	-	99,761							
Contingent Liabilities & Commitments	-	-	-	-	-	-	-							
Total unfunded exposures	-	-		-	-	-	-							
Total exposures	99,761				-		99,761							

Table 5.6 The geographical distribution of exposures including impaired assets and the related impairment provisions (PD 1.3.23 i)

(BD '000s)

Contribution by Equity and Current Account										
	12 month ECL									
	Gross Past	and Lifetime	Gross	Life time						
	Due	ECL not	Impaired	ECL credit						
	Financing	impaired (Stage	Financing	impaired						
	Contracts	1 & 2)	Contracts	(Stage 3)						
GCC Countries	92,658	(2,435)	74,157	(22,098)						
Europe	ı	•	4,217	(3,859)						
Total	92,658	(2,435)	78,374	(25,957)						

5 Profile of Risk-Weighted Assets and Capital Charge (continued)

5.1 Credit Risk (continued)

5.1.2 Exposure by Industry

Table 5.7 Exposure by type of credit exposure (PD 1.3.23 c)

(BD '000s) Contribution by Equity and Current Account Exposure Type Trading and Banks and Real Estate Aviation Individuals Government Others Total Manufacturi Financial Institutions Cash and balances with banks and Central Bank 47,079 29,142 6,366 82,587 354,215 354,215 Sovereign Sukuk Placements with financial institutions 40.542 23.002 63.544 Corporate Sukuk 1,715 4,094 3,408 9,222 57,319 90,016 126,035 129,059 568,905 Financing assets 68,886 97,591 Finance lease assets 18,549 72,476 119.849 1,332 44,685 256.892 Non-trading investments 85,177 1.308 21.022 107,508 74.261 Investment properties 74.261 6.290 Development properties 6,290 -15.972 15,972 Investment in associates 23.234 9,617 6,963 1,550 45,182 Other assets 3,816 25,971 25.971 Goodwill 99,103 290,394 1,308 255,870 480,673 174,622 1,610,549 Total funded exposures 308,578 Contingent Liabilities & Commitments 18,708 10,338 35,433 13,185 7,325 13,894 98,883 10,338 35,433 13,185 7,325 13,894 98,883 Total unfunded exposures 18,708 117.811 318.916 325.828 1.308 269.055 487.998 188,516 1,709,432 Total exposures

Table 5.8 Exposure by type of credit exposure (PD 1.3.23 c)

(BD '000s) Contribution by Equity of Investment Accountholders Exposure Type Trading and Banks and Real Estate Aviation Individuals Government Others Total Manufacturi Financial nstitutions Placements with financial institutions 99,761 99,761 99,761 99,761 Total funded exposures -Contingent Liabilities & Commitments Total unfunded exposures 99,761 99,761 Total exposures

Table 5.9 The exposure by industry including impaired assets and the related impairment is as follows: (PD 1.3.23 h)

Contribution by Equity and Current Account 12 month ECL **Gross Past** and Lifetime Gross Life time ECL not Impaired **ECL** credit Due Financing impaired (Stage Financing impaired Contracts 1 & 2) Contracts (Stage 3) Trading and Manufacturing 12,149 (430) 20,185 (10,048)Banks and Financial Institutions 26,039 (3,507)Real Estate 56,488 (828) 12.304 (5.891) 20.977 Individuals (1.034)14.559 (3,663)Government Others 3,044 (144)5,288 (2,849)Total 92,658 (2,435)78,374 (25,957)

5 Profile of Risk-Weighted Assets and Capital Charge (continued)

5.1 Credit Risk (continued)

Table - 5.10 Movement In Net Allowance For Credit Losses / Impairment - (PD 1.3.24 d)

The balance of allowance for credit loss in the below table includes all financial assets and off-balance sheet exposures in addition to financing assets.

				(BD '000s)
	Stage 1: 12-month ECL	Stage 2: Lifetime ECL not credit- impaired	Lifetime ECL credit-	Total ECL
Balance at the beginning of the year	7,982	16,052	65,559	89,593
transferred to Stage 1: 12 month ECL transferred to Stage 2: Lifetime ECL not credit-impaired transferred to Stage 3: Lifetime ECL credit-impaired Net remeasurement of loss allowance	1,328 (664) (290) (2,237)	(485) 2,659 (14,938)		- - - 15,565
Recoveries / write-backs Allowance for credit losses	(505) (2,368)	2,314 (218) (10,668)	15,488 (4,060) 23,818	(4,783) 10,782
Exchange adjustments and other movements Amounts written off during the year Elimination on consolidation			(227) (8,678) (52,045)	(227) (8,678) (52,045)
Balance at the end of the year	5.614	5.384	28.427	39.425

5.1.2 Exposure by Industry (continued)

Table 5.11 Ageing Analysis - (PD 1.3.24 b (i))

						(BD '000s)
	Gross Impa	aired and Past Du	e Contracts	Expected	Net	Market Value
	Up to 1 Year	Over 1 year up	Over 3 years	Credit	Outstanding	of Collateral
		to 3 years		Losses		
				(ECL)/		
Trading and Manufacturing	21,482	3,794	7,058	(10,477)	21,856	50,647
Banks and Financial Institutions	26,039	-	-	(3,507)	22,532	1,777
Real Estate	57,754	1,393	9,645	(6,718)	62,073	119,722
Individuals	27,189	993	7,353	(4,696)	30,840	54,879
Government	-	-	-	-	-	-
Others	6,576	974	785	(2,993)	5,341	11,369
Total	139,040	7,153	24,841	(28,392)	142,642	238,395

5.1.3 Exposure by External Credit Rating

The Group uses public information provided by external rating agencies such as Standard & Poor's, Fitch, Moody's and Capital Intelligence (accredited External Credit Assessment Institutions – ECAI). The lowest of the ratings based on information available to public is used as an input in computing rated exposures. (PD 1.3.22 c, d, e)

Table 5.12			(BD '000s)
	Gross Credit	Rated Exposure	Unrated
	Exposure*		Exposure
Cash	6,470	-	6,470
Claims on sovereigns	458,575	-	458,575
Claims on banks	254,794	183,762	71,032
Claims on corporate portfolio	191,347	-	191,347
Regulatory retail portfolio	60,017	-	60,017
Mortgages	407,360	-	407,360
Past due receivables over 90 days	55,624	-	55,624
Investments in Securities and Sukuk	12,660	-	12,660
Holding of Real Estate	194,176	-	194,176
Other assets and Specialized financing	80,692	-	80,692
Total	1,721,715	183,762	1,537,953

^{*} Gross credit exposure above have been extracted from the workings prepared based on the Form PIRI submitted to the CBB by the Bank.

It is the Group's policy to maintain accurate and consistent risk ratings across the credit portfolio through the internal risk rating system. As such, the Group uses internal risk ratings that are supported by a variety of financial analytics, combined with processed market information, to provide main inputs for measurement of counterparty credit risk. All internal ratings are tailored to various categories and are derived in accordance with the Group's credit policy and are assessed and updated on a regular basis. (PD 1.3.22 e)

Note a: In accordance with the Public Disclosure requirements to disclose the regulatory capital requirements for credit risk under standardised approach, the above amounts have been extracted from the workings prepared based on the Form PIRI submitted to the CBB by the Bank.

Note b: The gross credit exposure is arrived at after considering the following:

- inclusion of unfunded exposure (after CCF);
- risk weighting of excess amount over maximum permitted large exposure limit at 800%.

5 Profile of Risk-Weighted Assets and Capital Charge (continued)

5.1 Credit Risk (continued)

5.1.4 Maturity Analysis of Exposures

The table below summarizes the notional principal amounts and the relative exposure before applying credit risk mitigation:

124,628

56,915

 Table 5.13
 (BD '000s)

 Notional Principal
 Credit Exposure

 *
 *

 Contingent liabilities on behalf of customers
 37,499
 20,523

 Irrevocable unutilised commitments
 61,384
 13,661

 Forward foreign exchange contracts
 22,730
 22,730

 Operating lease commitments
 3,015

Total

Table 5.14 Contractual maturity analysis by major type of credit exposure - Funded (PD 1.3.23 g) (PD 1.3.24 a)

·									(BD '000s)
	Up to 3	3 months to 1	Total within	1 - 5 years	5 - 10 years	10 - 20 years	Over 20 years	Total Over	Total
	months	year	12 months					12 months	
Cash and balances with banks and Central Bank	82,587	-	82,587	-	-	-	-	-	82,587
Sovereign Sukuk	7,777	44,670	52,447	149,314	137,572	-	14,882	301,768	354,215
Placements with financial institutions	163,305	-	163,305	-	0	-	-	0	163,305
Corporate Sukuk	-	1,936	1,936	7,286	0	-	-	7,286	9,222
Financing assets and finance lease assets	112,369	222,409	334,778	284,815	147,153	44,519	14,532	491,019	825,797
Non-trading investments	-	-	-	107,508	-	-	-	107,508	107,508
Investment properties	-	-	-	74,261	-	-	-	74,261	74,261
Development properties	-	-	-	6,290	-	-	-	6,290	6,290
Investment in associates	-	-	-	15,972	-	-	-	15,972	15,972
Other assets	9,293	1,092	10,385	8,339	24,307	2,101	50	34,797	45,182
Goodwill	-	-	-	-	25,971	-	-	25,971	25,971
Total	375,331	270,107	645,438	653,785	335,003	46,620	29,464	1,064,873	1,710,311

Table 5.14 (a) Contractual maturity analysis by major type of credit exposure - Unfunded

									(BD '000s)
	Up to 3	3 months to 1	Total within	1 - 5 years	5 - 10 years	10 - 20 years	Over 20 years	Total Over	Total
	months	year	12 months					12 months	
Unutilised commitments	26,597	34,738	61,335	49	-	-	-	49	61,384
Contingent liabilities	17,444	15,132	32,576	4,923	-	-	-	4,923	37,499
Operating lease commitments		1,275	1,275	1,740	-	-		1,740	3,015
Forward foreign exchange contracts	17,093	5,638	22,730	-	-	-	-	-	22,730
Total	61,133	56,783	117,916	6,713	-			6,713	124,629

The above contractual maturity analysis is based on consolidated statement of financial position classification.

^{*} Credit exposure is after applying CCF.

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5 Profile of Risk-Weighted Assets and Capital Charge (continued)

5.1 Credit Risk (continued)

5.1.5 (a) Maturity analysis of funding

Table 5.15 Contractual maturity analysis by major type of funding

(BD '000s) 3 months to 1 Total within 1 - 5 years 5 - 10 years 10 - 20 years Over 20 years Total Over Total months 12 months 115,752 24,497 140.249 3.876 144.125 Placements from financial institutions 3,876 294,577 373,955 668,532 37,392 705,924 Placements from customers 37,392 251.842 Customer current accounts 251,842 251,842 77,471 28.380 105.851 47,481 2.211 49.692 155.543 Murabaha term financing 20,540 20.540 27,711 42 27.753 48.293 Other liabilities Equity of Investment Accountholders 99,761 99,761 99,761 859,943 426,832 1,286,775 116,460 2,253 118,713 1,405,488 Total

5.2 Market Risk

Market risk arises from fluctuations in global yields on financial instruments and foreign exchange rates that could have an indirect effect on the Group's assets value and equity prices. The Board of Directors has set limits on the risk that may be accepted. This is monitored on a regular basis by the Group's Asset and Liability Committee. (PD 1.3.27 a)

Table 5.16 The Group's capital charge in respect of market risk in accordance with the standardized methodology is as follows:

					(BD .0008)
	Risk Weighted	Capital	Period End	Capital	Capital
	Asset	Requirement	Capital	Requirement	Requirement
			Charge	-Minimum*	-Maximum*
Foreign exchange risk	2,306	288	184	184	230
Total market risk	2,306	288	184	184	230

^{*} The information in these columns shows the minimum and maximum capital charge of each of the market risk categories on a quarterly basis during the year ended 31 December 2018.

Foreign exchange positions constitute a major component of the market risk capital charge. The Group maintains a conservative market risk exposure that is focused on the foreign exchange risk coming from the Group's banking book positions. The open positions were taken in order of running the Group's day to day operations that include funding for the Group's investment portfolio. The Group monitors and manages these open positions on a daily basis. (PD 1.3.27 a)

5.3 Operational Risk

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes or systems, or from external events. Operational risk is inherent in all business activities and can never be eliminated entirely; however shareholder value can be preserved and enhanced by managing, mitigating and, in some cases, insuring against operational risk. To achieve this goal, the Group has developed an operational risk framework which encompasses identification, measurement, management and monitoring of risk through risk control and mitigation. A variety of underlying processes are being deployed across the Group including risk and control self assessments, Key Risk Indicators (KRI), event management, new product review and approval processes and business contingency plans. (PD 1.3.21 c)

The Group's policy dictates that the operational functions of booking, recording and monitoring of transactions are carried out by staff that are independent of the individuals initiating the transactions. Each business line including Operations, Information Technology, Human Resources, Legal, Compliance and Financial Control is further responsible for employing the aforementioned framework processes and control programs to manage its operational risk within the guidelines established by the policy, and to develop internal procedures that comply with these policies. To ensure that all operational risks to which the Group is exposed to are adequately managed, support functions are also involved in the identification, measurement, management, monitoring and control/mitigation of operational risk, as appropriate. (PD 1.3.28) (PD 1.3.28)

Consistent with the fundamental principle of ownership, the relevant business units are accountable and responsible for managing the operational risks relevant to their respective businesses. Consequently, business and support units have documented procedures and controls in place along with departmental instruction manuals. All changes to such policies are subject to agreement by all respective business units and approval of the Board of Directors following management review. Procedures are reviewed by the respective business or support unit and approved at the management level. (PD 1.3.28) (PD 1.3.29)

The Group has a well established disaster recovery program, and has documented updated procedures covering all activities necessary for business continuity in case of a business disrupting event. Internal Audit also provides an independent assessment to evaluate the program's effectiveness.

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5 Profile of Risk-Weighted Assets and Capital Charge (continued)

5.3 Operational Risk (continued)

In accordance with the basic indicator approach methodology of Basel III, the total minimum capital charge in respect of operational risk was BD 12,587 thousands. This capital charge was computed by categorizing the Group's activities into its specific business lines (as defined by the Basel III framework) and multiplying the business line's average gross income for the last three financial years by a predefined beta factor. (PD 1.3.19)

Table 5.17	(BD '000s)
	Dec-18
Average gross income	53,706
Risk weighted exposures	100,699
Minimum capital charge	12,587

The Group uses the Temenos T24 core system developed by Globus, for obtaining the data needed for analysis of events and data related to credit, market and operational risk assessment. Following the data consolidation, the Bank uses the RiskAuthority integrated risk solution package from Moody's, at a solo level, that would allow for automated capital adequacy calculations, and exposure analysis for credit, market and operational risks. Together, the Temenos T24 and Fermat systems are considered an integral part of the Group's Risk Management Framework. This is currently being rolled out at the Group level.

Non-Shari'a compliant income for the year ended 31 December 2018 amounted to BD 297 thousands. This has arisen primarily from conventional financing and investments, penalty charges from customers and income on current accounts balances held with correspondent banks. No Sharia violations were identified during the year. (PD 1.3.30 a, b)

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Profile of Risk-Weighted Assets and Capital Charge (continued)

5.4 Rate of Return Risk (PD 1.3.39)

Rate of return risk arises from the possibility that changes in return rates will affect future profitability or the fair values of financial instruments. The Group is exposed to rate of return risk as a result of mismatches of return rate repricing of assets and liabilities. In addition, rate of return risk can also affect the Group through market wide rate changes that are brought on by changes in the economy. The effect of the market rates is reflected and can be seen in the Group's pricing of contracts as they carry competitive pricing that follows the market. When risks are high, the market tends to place a higher rate of return to maintain the risk/return profile. Accordingly, the market reduces the rate of return when it identifies a decrease in the market wide risk that would be reflected by banks decreasing their rate of return pricing.

This risk is minimized as the Group's rate sensitive assets and liabilities are mostly for short tenures. In addition, the Group's cautious asset liability strategy avoids funding short term lending facilities from long term borrowings. The Group has set limits for profit return risk and these are monitored on an ongoing basis by the Group's Asset and Liability

The below tables provides the asset and liability re-pricing profile on the contractual repricing or maturity dates, whichever is earlier for the year ended 31 December 2018. (PD

Table 5.18

ASSETS	Total	Upto 1 month	>1 to 3 months	>3 to 6 months	>6 to 12 months	>1 to 2 years	>2 years	Profit insensitive
Cash and balances with banks and Central								
Bank	82,587		-	-	-	-		82,587
Sovereign Sukuk	354,215	4,097	3,681	19,670	25,000	20,178	281,590	-
Placements with financial institutions	163,305	163,305	-	-	-	-	-	-
Corporate Sukuk	9,222	288	-	1,940	35	3,861	3,098	-
Financing assets	568,905	23,786	79,924	67,758	101,481	62,217	233,739	-
Finance lease assets	256,892	3,340	5,321	4,824	48,346	22,488	172,573	-
Non-trading investments	107,508	-	-	-	-	-	-	107,508
Investment properties	74,261	-	-	-	-	-	-	74,261
Development properties	6,290	-	-	-	-	-	-	6,290
Investment in associates	15,972	-	-	-	-	-	15,972	-
Other assets	45,182	9,211	139	1,048	44	744	31,220	2,776
Goodwill	25,971	-	-	-	-	-	-	25,971
Total Assets (A)	1,710,310	204,025	89,065	95,239	174,906	109,489	738,193	299,393

Total with Off-Balance Sheet Items	1,685,335	218,990	40,639	79,752	97,339	90,050	964,865	193,700
LIABILITIES	Total	Upto 1 month	>1 to 3 months	>3 to 6 months	>6 to 12 months	>1 to 2 years	>2 years	Profit insensitive
Placements from financial institutions	144,125	96,668	17,200	10,825	15,556	3,876	0	-
Placements from customers	705,924	136,517	158,059	144,112	229,843	25,271	12,121	-
Customer current accounts	251,842	-	-	-	-	-	-	251,842
Murabaha term financing	155,543	-	77,470	31	28,349	15,854	33,838	-
Other liabilities	48,293	20,538	-	-	0	-	27,754	-
Equity of investment accountholders	99,761		-	-	-	-	-	99,761
Total Liabilities	1,405,487	253,723	252,730	154,969	273,749	45,000	73,713	351,603
Shareholders funds	304,823	-	-	-	-	-	-	304,823
Total Liabilities & Shareholders Funds	1,710,310	253,723	252,730	154,969	273,749	45,000	73,713	656,426
Off-Balance Sheet Liabilities	98,883	11,882	12,097	23,764	16,422	34,717	-	-
Total liabilities with Off-Balance Sheet Items	1,809,193	265,606	264,827	178,733	290,171	79,717	73,713	656,426
(B)								
Gap (A - B)		(61,580)	(175,762)	(83,494)	(115,264)	29,771	664,479	(357,032)
Cumulative Gap		(61,580)	(237,343)	(320,837)	(436,101)	(406,330)	258,149	(98,883)

Table 5 18 (a)

Table 5.10 (a)		()
Profit rate risk in the E	Banking Book	
200bp Profit Rate	Shocks	
		Effect on net profit
		at
Rate shock	Currency	31 December 2018
Upward rate shocks:	USD	627
	BHD	269
Downward rate shocks:	USD	(627)
	BHD	(269)

5.5 Equity Position Risk (PD 1.3.21 d) (PD 1.3.31)

Equity position risk arises from the possibility of changes in the price of equities or equity indices and the corresponding effect they will have on future profitability or the fair values of financial instruments. The Group is exposed to equity risk in the non-trading position and investment portfolio primarily in its core international and GCC markets

Equity risk in the banking book is effectively managed by the active involvement of the Executive and Investment committees; adhering to the policies and procedures in place; involvement of competent professionals; adequate internal control environment and independent internal audit department.

Executive and Investment Committee Oversight

The Board of Director's involvement begins with the approval of the Investment Policy which essentially determines the following: aggregate portfolio parameters, asset class restrictions, approval authorities, risk tolerance, maturity considerations, exit strategy and governance issues

The Executive Committee has delegated authority within the overall Board authority. It provides direction to the Executive Management on all business matters and assumes the role of the Board to address matters arising between Board meetings. The Committee is responsible for business matters concerning credit and market risks, strategy review and recommendations to the Board. The Investment Committee reviews and approves all transactions related to corporate and real estate investments, as well as monitoring their performance on an ongoing basis. In addition, the Committee is responsible to oversee the performance of the fund managers and recommend exit strategies to maximize return to

Internal Controls

With regard to internal controls, the investment activity is subject to the same rigorous checks and balances in place for the commercial banking activity. Adequacy of internal controls is ensured by the recruitment of adequate qualified professionals, proper definition and communication of departmental and personnel roles, separation of responsibilities of origination and implementation, independent reporting by the Financial Controls Department, periodic internal audit of the existence and implementation of processes and controls. All recommendations of the Investment Department are documented in the form of Investment Portfolio Reports and Investment Memorandums and are subject to independent due diligence review by Investment Middle Office. Responsibility for all deployments and receipt of redemption proceeds vests with the Investment Administration Department. The Investment Department ensures transparency in valuation by sourcing pricing from the available sources and using conservative valuation principles in accordance with international accounting standards. In addition, the Investment Middle Office operates as an independent department that is responsible for undergoing the diligence for investments proposed by the Investments Department. This way, the Investment Department can specialize in sourcing deals and performing the initial analysis, whereas the Investment Middle Office will focus on preparing the detailed due diligence analysis at the start of an investment. Moreover, the Investment Administration Department will perform the investment management duties of monitoring the investment company and preparing performance reports along with other required documentation. This set-up helps streamline processes as each group will focus on a specific set of duties that results in time savings as well as having independence controls.

Table 5.19 Equity positions in the Banking Book

	(BD '000s)
	Gross Credit Exposure
Quoted Equities	3,576
Unquoted Equities	105,003
Investment in associates - equity accounted	15,972
Net realized loss during the year	(106)
Net unrealized loss during the year	(1,788)

Asset Categories for Credit Risk	Gross Credit Exposure	Risk- Weighted Assets (RWA)	Minimum Capital Charge
Equity Investments - Unlisted	1,644	2,466	308
Significant investment in the common shares of financial entities >10%	10,975	27,438	3,430
Investment in listed real estate companies	8,858	26,573	3,322
Investment in unlisted real estate companies	103,304	413,216	51,652

The Group's equity positions strategy consists of investments that are expected to bring in capital gains or for strategic reasons. The strategy has been drafted after considering the Board's risk appetite and the Board's approved liquidity, market risk and capital management policies. In line with the Board's approved policies, the investment strategy is conservative in the sense that it avoids investments with high volatility returns.

5.6 Displaced Commercial Risk

(PD 1.3.41 a) (PD 1.3.21 f) (PD 1.3.32 i)

The Group is exposed to displaced commercial risk in the event of having Equity of investment accounts (EOIA) profit rates that are lower than market rates, thus putting the Group in risk of paying EOIA account holders from shareholders funds to cover the profit volatility risk. ASBB has mitigated this risk through regular monitoring of liquidity gaps, deposit rates and concentrations in terms of the funding requirements by the Asset Liability Committee (ALCO). The ALCO reviews and monitors peer review analysis which includes average deposit rates paid by its peers in order to realign the deposit rates with the current market.

5.7 Liquidity Risk

The Group monitors in an active manner its liquidity profile through analysis of the liquidity gap across specific timeframes in order to maintain the net asset liability position that is within the Board's risk appetite. The maintenance of the net asset liability position is done through the monitoring of the Group's liquidity indicators through which the Group's liquidity profile can be assessed. In addition, the Group further mitigates its liquidity risk by establishing multiple funding sources to decrease it's correlation to an individual funding counterparty. The multiple funding lines can be used to offset any shortage resulting from the Group's obligations and/or to settle any shortage from each of the current accounts and Equity of investment accounts. The liquidity coverage ratio as of 31 December 2018 was 244%.

5.8 Other Risks

The Group has an investment in a foreign banking subsidiary whereing the transactions are denominated in US Dollars (USD) and since the USD is pegged to BHD, there is no foreign exchange translaction effect on the investment. (PD 1.3.42).

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6 Equity of Investment Accountholders

Equity of investment accounts ("EOIA") [previously known as Unrestricted Investment Accounts] are investors' funds held by the Group to be invested as appropriate without restriction as to where, how and for what purpose the funds are invested. EOIA funds are invested in short term placements with financial institutions using specific limits assigned for each institution. Savings accounts and call accounts comprise the EOIA, payable on demand and the account holder has the right to withdraw or transfer funds without penalty.

This allocation of assets has not changed since the last financial year. The funds are invested and managed in accordance with Shari'a principles. (PD 1.3.32 b)

Equity of investment account holders' funds are commingled with the Group's funds and invested mostly in short term placements with financial institutions. According to the terms of acceptance of the unrestricted investment accounts, 100% of the funds are invested after deducting a mandatory reserve. In order to avoid excessive risk concentration the Group invests the commingled funds in such a way so as to comply with the CBB's large exposures limits. All Equity of investment accounts are classified as Mudarabas where fees are deducted before profit allocation, as there is no limit against their withdrawal. It should however be noted that Mudaraba account fees are subject to being partially or totally waived in order to match investment account holder market returns. (PD 1.3.32 c, j, k)

Profit paid to the EOIA holders is based on the rate of return earned by the pool of profit bearing assets in which the EOIA have participated. The account holder participates in 50% of the profits earned in full after netting off the Mudarib fee as above. As a result, the share of profits earned by the EOIA holders for their Mudaraba accounts is equal to the share of profits paid to them. All equity of investment accounts are carried at cost plus accrued profits less amounts repaid. Income to Equity of investment account holders is allocated on the basis of their average daily balances in proportion to shareholders' balances. The profits paid to EOIA and the rate of return earned over the previous years are disclosed in the below table. (PD 1.3.32 d, I, h)

The Risk weighted assets of the Group include the contribution from EOIA which are subject to the 30% risk weight.

The EOIA holders and other customers can use the Group's relationship managers for any advice, mediation services, grievances and complaints. (PD 1.3.32 f, g)

There is no variation between Mudarib agreed sharing and contractual agreed ratio. Profit earned and paid and rate of return comparatives for the Equity of investment account holders for the year end 31 December 2018 and years ended 31 December 2017, 2016, 2015, 2014 and 2013 are as follows; (PD 1,3,33 e. l. m. n)

(BD '000s) Table 6.1 Dec 2018 Dec 2017 Dec 2016 Dec 2015 Dec 2014 Dec 2013 Shareholders 246 119 119 155 215 148 49 391 OIA (before smoothing) 230 282 216 391 Profit earned for EOIA before smoothing 492 230 282 279 Profit paid for EOIA after smoothing 119 119 148 246 15 215 Balance of: NI/A N/A N/A N/A N/A N/A **IRR** N/A Annual Rate of Return Benchmark 3% 3% 3% 3% Annual Rate of Return (EOIA) - Profit earned 0.49% 0.19% 0.31% 0.45% 1.39% 1.08% Annual Rate of Return (EOIA) - Profit paid 0.25% 0.10% 0.17% 0.25% 0.76% 0.60% PER Amount PER % IRR Amount IRR % Reconciliation Mudaraba Profit Earned 49: 230 216 282 391 279 (111) (127)(176)(131)Mudarib fees (246)(97)Profit credited to EOIA accounts 119 119 155 148 240 215 119 119 155 215 148 246 Profit on EOIA Mudarib fee as a percentage of total investment profit 50% 48% 45% 45% 45% 47% **EOIA Balance** 99,761 118,881 68,796 62,351 28,152 25,846

Table	6.2

RWA as per PIRI Report

Table 0.2						
	Dec 2018	Dec 2017	Dec 2016	Dec 2015	Dec 2014	Dec 2013
Rate of Return	0.25%	0.10%	0.17%	0.25%	0.76%	0.60%
Return on average EOIA assets (ROAA)	0.49%	0.26%	0.32%	0.42%	1.28%	1.11%
Return on average equity (Total Owner's Equity) (ROAE)	0.16%	0.14%	0.07%	0.09%	0.13%	0.13%

22.954

62,424

13.759

6.506

4.387

4.394

6 Equity of Investment Accountholders (continued)

Table 6.3 Equity of investment accountholders by Counterparty Type and Islamic Product Murabaha (PD 1.3.33 i)

Murabaha and Wakala receivables from banks				(BD '000s)
	Total	Funded by	Funded by	% of EOIA to
	Exposures	EOIA	Self & Call	Total
			A	
Counterparty			Accounts	
Counterparty Financial Institutions	163,305	99,761	Accounts	61%

Table 6.4 The changes in asset allocation ratio are as follows: (PD 1.3.32 d)

						(BD '000s)		
	Murabaha and Wakala		Corpora	te Sukuk	Murabaha and Mudaraba			
	receivables from banks		receivables from banks		eceivables from banks fina		finan	cing
	EOIA	EOIA Self & Call		Self & Call	EOIA	Self & Call		
		Accounts		Accounts		Accounts		
Asset Allocation as on 31 December 2018	99,761	63,544	-	-	-	-		
Asset Allocation as on 31 December 2017	118,881	24,922	-	-	-	-		
Asset Allocation as on 31 December 2016	68,796	113,656	-	-	-	-		
Asset Allocation as on 31 December 2015	62,351	40,994	-	-	-	-		
Asset Allocation as on 31 December 2014	24,281	157,829	3,871	135,433		460,029		
Asset Allocation as on 31 December 2013	21,969	96,258	3,877	87,229	-	261,700		
Asset Allocation as on 31 December 2012	18,276	85,014	-	-	-	227,109		

There are no off-balance sheet exposures arising from investment decisions attributable to the EOIA holders because EOIA are used for short term Islamic financing contracts

Other Disclosures

Currency Risk

Currency risk is the risk that the value of a financial instrument will fluctuate due to changes in foreign exchange rates. The Board has set limits on positions by currency. Positions are monitored on a periodic basis by the Audit and Risk Committee as well as ALCO to ensure positions are maintained within established limits. Substantial portion of the Group's assets and liabilities are denominated in Bahraini Dinars, US Dollars or Saudi Riyals. As the Bahraini Dinar and Saudi Riyals are pegged to the US Dollars, positions in these currencies are not considered to represent significant currency risk as of 31 December 2018 and 2017.

Related Party Transactions

Related parties represent associated companies, major shareholders, directors and key management personnel of the Group and entities controlled, jointly controlled or significantly influenced by such parties. Pricing policies and terms of these transactions are approved by the Group's Senior Management. For further details refer Note 31 titled Related Party Transactions in the consolidated financial statements for the year ended 31 December 2018. The intra-group and related party transactions are made at arms length basis during the year. (PD 1.3.10 e) (PD 1.3.23 d)

Restructured Facilities

As at 31 December 2018, the balance of the renegotiated financing facilities to individuals and corporate was BD 7,720 thousands. Most of the renegotiated facilities are performing and are fully secured. In general, facilities are renegotiated to optimize a facility's credit profile with respect to its recoverability. This can involve changing any of the profit rate, tenure or security package. The above restructuring did not have any significant impact on present and future earnings. (PD 1.3.23 j)

Assets Sold Under Recourse Agreements

The Group has not entered into any recourse agreement during the year ended 31 December 2018. (PD 1.3.23 k)

Legal Risk and Claims

As at 31 December 2018, legal suits amounting to BD 5,552 thousands (2017: BD 545 thousands) were pending against the Group. Based on the opinion of the Group's legal counsel, the total estimated liability arising from these cases is not considered to be material to the Group's consolidated financial position as the Group has also filed counter cases against these parties. (PD 1.3.30 c)

Deposit Protection Scheme

Certain customers' deposits of the Group are covered by deposit protection schemes established by the Central Bank of Bahrain (CBB). Customers' deposits held with the Bank in the Kingdom of Bahrain are covered by the Regulation Protecting Deposits and Equity of unrestricted investment accounts issued by the CBB in accordance with Resolution No.(34) of 2010. This scheme covers eligible 'natural persons' (individuals) up to a maximum of BD 20,000 as set out by CBB requirements. A periodic contribution as mandated by the CBB is paid by the Group under this scheme. (PD 4.4.2)

Exposure to highly-leveraged and other high-risk counterparties

The bank has no exposure to highly-leverged and other high-risk counterparties as per the definition provided in the CBB rulebook PD-1.3.24 (PD 1.3.23 e)

Exposures in excess of regulatory limits

the CBB has set a single exposure limit of 15% of the bank's total Capital Base on exposures to individuals and a combined exposure limit of 25% of the total Capital Base of closely-connected counterparties. The excess amount of any exposure above the mentioned thresholds must be riwk-weighted at 800% unless it is an exempt exposure in accordance with the requirements in the CBB rulebook

The bank has no exposures that are in excess of individual obligor limit of 15% of the bank's Capital Base as of 31 December 2018 (PD 1.3.23 f)

CBB Penalties (PD 1.3.44)

During 2018 an amount of BD 1,200 was paid as penalty to the Central Bank of Bahrain (CBB) for failure to comply with CBB requirements relating to: As per HC-7,2,3A, Bahraini Islamic bank licensees must provide to the CBB, for its review and comment, at least 5 business days prior to communicating with the shareholders or publishing in the press, the draft agenda for any shareholders' meetings; the same was provided to CBB 2 business days before publication. The bank however received approval on the agenda and published it before the required timne.

APPENDIX I - COMPOSITION OF CAPITAL DISCLOSURE

Appendix PD-2: Reconciliation requirements

Step 1: Disclosure of Balance Sheet under Regulatory scope of Consolidation

There are no differences between the regulatory and accounting consolidation, with both following line by line consolidation approach using consistent account policies without excluding any entities. As mandated by the Central Bank of Bahrain ("CBB"), financing facilities and investments have been grossed up with collective impairment provision, as presented below:

	BHD '000
Balance sheet as per published financial statements	1,710,309
Collective provision impairment	11,952
Less: Provision related to Contingent Liabilities and Commitments	(611)
Balance sheet as in Regulatory Return	1,721,651

Step 2: Reconcilation of published financial balance sheet to regulatory reporting as at 31 December 2018

Assets	Balance sheet as		
Assets	in		
	published		
	financial	Consolidated	
	statements	PIRI data	Reference
Cash and balances with banks and Central Bank	82.587	82.587	
Placements with banks and similar financial institutions	163,305	163,306	
of which Self financed	-	63,545	
of which financed by URIA	-	99,761	
Held-to-maturity investments	363,437	363,456	
of which Sovereign Sukuk	354,215	-	
of which Corporate Sukuk	9,222	-	
Financing assets	568,905	847,678	
Finance lease assets	256,892	-	
Assets under conversion - Loans and Advances	11,559	-	
Available-for-sale investments	1,658	1,658	
Investment properties	80,551	80,551	
of which Investments in real estate	74,261	-	
of which Development properties	6,290	_	
Investment in associates	15,972	16,938	
Property, plant, and equipment (PPE)	20,112	20,112	
Other Assets	145,332	145,364	
Non Trading investment	105,850	-	
Other receivables and prepayments	13,512	-	
Goodwill	25,971	-	G
Total Assets	1,710,309	1,721,651	
	, ,	, ,	
Liabilities			
Current accounts for non-banks	251,842	251,842	
Balances of banks and similar institutions	144,125	144,125	
Funding Liabilities (eg. reverse commodity murabaha, etc.)	861,467	861,467	
of which Wakala payables to non-banks	705,924	-	
of whichTerm financing	155,543	-	
Accruals, deferred income, other liabilities, current and deferred tax liabilities (DTLs)	48,292	47,682	
of which Other liabilities	42,287	41,677	
of which Dividends payable	6,005	6,005	
Unrestricted Investment Accounts	99,761	99,761	
Total Liabilities	1,405,487	1,404,877	
Owners' Equity			_
Total share capital	210,238	210,238	Α
Share capital	214,093	214,093	
Treasury stock	(3,855)	(3,855)	
Reserves and retained earnings	93,901	93,901	
Share premium	12,209	12,209	C-1
Statutory reserve	18,998	18,998	C-2
Retained earnings (excluding profit for the year)	23,602	23,602	B-1
Net profit for the year	18,499	18,499	B-2
Fx translation adjustment	(3,195)	(3,195)	C-3
Changes in fair value - amount eligible for CET1	199	199	C-4
Real estate fair value reserve - amount eligible for T2	23,589	23,589	D
Minority interest in subsidiaries' share capital	683	683	
of which amount not eligible for regulatory capital	-	471	F 4
of which amount eligible for CET1	-	182	E-1
of which amount eligible for AT1	-	13	E-2
of which amount eligible for T2	-	17	E-3
Expected credit losses (Stages 1 & 2)	201 222	11,952	F
Total Owners' Equity	304,822	316,774	
Total Liabilities + Owners' Equity	1,710,309	1,721,651	1

^{*} Appendix PD 1 to be used post 1 January 2019

Appendix PD-2 & PD-4: Reconciliation requirements & Template during the transitional period Step 3: Composition of Capital Common Template (transition) as at 31 December 2018

	Composition of Capital and mapping to regulatory reports	Component of regulatory capital	Reference numbers of balance sheet under the regulatory scope of consolidation from step 2	Amount subject to pre- 2015 treatment
1	Directly issued qualifying common share capital (and equivalent for non-joint stock companies)			
	plus related stock surplus	210,238		
	Retained earnings Accumulated other comprehensive income (and other reserves)	42,101	B1+B2 C1+C2+C3+C4	
	Not Applicable	20,211	01+02+03+04	
	Common share capital issued by subsidiaries and held by third parties (amount allowed in			
_	group CET1)	182	E1	108
6	Common Equity Tier 1 capital before regulatory adjustments Common Equity Tier 1 capital: regulatory adjustments	280,732		
7	Prudential valuation adjustments	-		
	Goodwill (net of related tax liability)	25,971	G	
	Other intangibles other than mortgage-servicing rights (net of related tax liability)	-		
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)	_		
11	Cash-flow hedge reserve	-		
	Shortfall of provisions to expected losses	-		
	Securitisation gain on sale (as set out in paragraph 562 of Basel II framework)	-		
	Not applicable. Defined-benefit pension fund net assets	-		
16	Defined benefit pension fund het assets			
	Investments in own shares (if not already netted off paid-in capital on reported balance sheet)	-		
	Reciprocal cross-holdings in common equity	-		
18	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the bank does not own more			
	than 10% of the issued share capital (amount above 10% threshold)	-		
19	Significant investments in the common stock of banking, financial and insurance entities that are			
	outside the scope of regulatory consolidation, net of eligible short positions (amount above 10%			
20	threshold) Mortgage servicing rights (amount above 10% threshold)	-		
	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of			
	related tax liability)	-		
	Amount exceeding the 15% threshold	=		
23 24	of which: significant investments in the common stock of financials of which: mortgage servicing rights	-		
25		-		
	National specific regulatory adjustments	-		
	REGULATORY ADJUSTMENTS APPLIED TO COMMON EQUITY TIER 1 IN RESPECT OF AMOUNTS SUBJECT TO PRE-2015 TREATMENT	_		
27	Regulatory adjustments applied to Common Equity Tier 1 due to insufficient Additional Tier 1	-		
	and Tier 2 to cover deductions	-		
	Total regulatory adjustments to Common equity Tier 1	25,971		
29	Common Equity Tier 1 capital (CET1) Additional Tier 1 capital: instruments	254,761		
30	Directly issued qualifying Additional Tier 1 instruments plus related stock surplus	-		
31	of which: classified as equity under applicable accounting standards	-		
32		-		
	Directly issued capital instruments subject to phase out from Additional Tier 1 Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by	-		
34	subsidiaries and held by third parties (amount allowed in group AT1)	13	E-2	(3)
35	of which: instruments issued by subsidiaries subject to phase out	-		
36	Additional Tier 1 capital before regulatory adjustments	13		
37	Additional Tier 1 capital: regulatory adjustments Investments in own Additional Tier 1 instruments	_		
	Reciprocal cross-holdings in Additional Tier 1 instruments	- -		
39				
	Investments in the capital of banking, financial and insurance entities that are outside the scope			
	of regulatory consolidation, net of eligible short positions, where the bank does not own more than 10% of the issued common share capital of the entity (amount above 10% threshold)	_		
40	Significant investments in the capital of banking, financial and insurance entities that are outside	_		
	the scope of regulatory consolidation (net of eligible short positions)	-		
41	National specific regulatory adjustments			
	REGULATORY ADJUSTMENTS APPLIED TO ADDITIONAL TIER 1 IN RESPECT OF AMOUNTS SUBJECT TO PRE-2015 TREATMENT			
42	Regulatory adjustments applied to Additional Tier 1 due to insufficient Tier 2 to cover	_		
	deductions	-		
	Total regulatory adjustments to Additional Tier 1 capital	- 40		
	Additional Tier 1 capital (AT1) Tier 1 capital (T1 = CET1 + AT1)	13 254,774		
70	Tier 2 capital: instruments and provisions	204,174		
	Directly issued qualifying Tier 2 instruments plus related stock surplus	23,589	D	
	Directly issued capital instruments subject to phase out from Tier 2	-		1
48	Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier 2)	17	E-3	(4)
49	of which: instruments issued by subsidiaries subject to phase out	-''	_ ~	(4)
50	Provisions	11,952	F	
51	Tier 2 capital before regulatory adjustments	35,558	I	İ

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	restments in own Tier 2 instruments	-
	ciprocal cross-holdings in Tier 2 instruments	-
54		
	restments in the capital of banking, financial and insurance entities that are outside the scope regulatory consolidation, net of eligible short positions, where the bank does not own more	
	in 10% of the issued common share capital of the entity (amount above the 10% threshold)	
	gnificant investments in the capital banking, financial and insurance entities that are outside	-
	scope of regulatory consolidation (net of eligible short positions)	
	tional specific regulatory adjustments	-
	GULATORY ADJUSTMENTS APPLIED TO TIER 2 IN RESPECT OF AMOUNTS SUBJECT	
	PRE-2015 TREATMENT	_
_	tal regulatory adjustments to Tier 2 capital	<u> </u>
	er 2 capital (T2)	35,558
	tal capital (TC = T1 + T2)	290,332
	SK WEIGHTED ASSETS IN RESPECT OF AMOUNTS SUBJECT TO PRE-2015	250,552
	EATMENT	
	tal risk weighted assets	1,408,140
	pital ratios	1,400,140
	mmon Equity Tier 1 (as a percentage of risk weighted assets)	18.09%
	er 1 (as a percentage of risk weighted assets)	18.09%
	tal capital (as a percentage of risk weighted assets)	20.62%
	titution specific buffer requirement (minimum CET1 requirement plus capital conservation	
	ffer plus countercyclical buffer requirements plus D-SIB buffer requirement expressed as a	
per	rcentage of risk weighted assets)	9.00%
65	of which: capital conservation buffer requirement	2.50%
66	of which: bank specific countercyclical buffer requirement (N/A)	0.00%
67	of which: D-SIB buffer requirement (N/A)	0.00%
68 Co	mmon Equity Tier 1 available to meet buffers (as a percentage of risk weighted assets)	18.09%
Na	tional minima including CCB (if different from Basel 3)	
	BB Common Equity Tier 1 minimum ratio	9.00%
	BB Tier 1 minimum ratio	10.50%
	BB total capital minimum ratio	12.50%
	nounts below the thresholds for deduction (before risk weighting)	
	n-significant investments in the capital of other financials	-
	gnificant investments in the common stock of financials	-
	ortgage servicing rights (net of related tax liability)	-
	ferred tax assets arising from temporary differences (net of related tax liability)	-
	plicable caps on the inclusion of provisions in Tier 2	-
	ovisions eligible for inclusion in Tier 2 in respect of exposures subject to standardised	44.050
	proach (prior to application of cap)	11,952
	p on inclusion of provisions in Tier 2 under standardised approach (1.25% of risk weighted	40.000
78 N/A	sets)	16,306
78 N/A		
-	pital instruments subject to phase-out arrangements (only applicable between 1 Jan 2020	
	d 1 Jan 2024)	
	rrent cap on CET1 instruments subject to phase out arrangements	-
80 Cu 81	ment cap on OE i i instruments subject to phase out arrangements	-
-	nount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	_
	rrent cap on AT1 instruments subject to phase out arrangements	_
	nount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	
	rrent cap on T2 instruments subject to phase out arrangements	<u> </u>
	nount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-

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Features of regulatory capital For the period ended 31 December 2018

	endu ended 31 December 2010	1
1	Issuer	Al Salam Bank, Bahrain
2	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)	SALAM
		All applicable laws and regulations of the
3	Governing law(s) of the instrument	Kingdom of Bahrain
	Regulatory treatment	
4	Transitional CBB rules	Common Equity Tier 1
5	Post-transitional CBB rules	Common Equity Tier 1
6	Eligible at solo/group/group & solo	Group
7	Instrument type (types to be specified by each jurisdiction)	Common Equity shares
8	Amount recognised in regulatory capital (Currency in mil, as of most recent reporting date)	BD 214.093 Million
9	Par value of instrument	BD 0.100
10	Accounting classification	Shareholders' Equity
11	Original date of issuance	13-Apr-06
12	Perpetual or dated	Perpetual
13	Original maturity date	No maturity
14	Issuer call subject to prior supervisory approval	No
15	Optional call date, contingent call dates and redemption amount	Not applicable
16	Subsequent call dates, if applicable	Not applicable
	Coupons / dividends	
17	Fixed or floating dividend/coupon	Dividend as decided by the Shareholders
18	Coupon rate and any related index	Not applicable
19	Existence of a dividend stopper	Not applicable
20	Fully discretionary, partially discretionary or mandatory	Fully discretionary
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Non cumulative
23	Convertible or non-convertible	Non convertible
24	If convertible, conversion trigger (s)	Not applicable
25	If convertible, fully or partially	Not applicable
26	If convertible, conversion rate	Not applicable
27	If convertible, mandatory or optional conversion	Not applicable
28	If convertible, specify instrument type convertible into	Not applicable
29	If convertible, specify issuer of instrument it converts into	Not applicable
30	Write-down feature	No
31	If write-down, write-down trigger(s)	Not applicable
32	If write-down, full or partial	Not applicable
33	If write-down, permanent or temporary	Not applicable
34	If temporary write-down, description of write-up mechanism	Not applicable
	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to	.,
35	instrument)	Not applicable
36	Non-compliant transitioned features	No
37	If yes, specify non-compliant features	Not applicable