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GULF INTERNATIONAL BANK (UK) LTD

Pillar 3 disclosures

31 December 2022

Contents

Glossary

ALCO	Assets and Liabilities Committee
AROC	Audit and Risk Oversight Committee
BoE	Bank of England
BRC	Business Risk Committee
CCoB	Capital Conservation Buffer
CCyB	Counter-cyclical buffer
CEO	Chief Executive Officer
CET 1	Common Equity Tier 1 Capital
CFO	Chief Finance Officer
CRD	Capital Requirements Directive
CRR	Capital requirements Regulation
CSA	Credit Support Agreement
ECAI	External Credit Assessment Institution
ECL	Expected Credit Loss
ESG	Environmental, Social and Governance
EU	The European Union
EXCO	Executive Committee
FCA	Financial Conduct Authority
Fed	Federal Reserve Board
FVTPL	Fair value through profit & loss
FX	Foreign exchange
GIB	Gulf International Bank BSC
GIB (UK)	Gulf International Bank (UK) Ltd
GMRA	Global Master Repurchase Agreement
ICAAP	Internal Capital Adequacy Assessment Process
IFRS	International Financial Reporting Standards
ILAAP	Internal Liquidity Adequacy Assessment
IRRBB	Interest rate risk in the banking book
ISDA	International Swaps and Derivatives Association
KRI	Key Risk Indicators
KSA	Kingdom of Saudi Arabia
LCR	Liquidity Coverage Ratio
MREL	Minimum Requirement for Own Funds and Eligible Liabilities
MRT	Material Risk Takers
NSFR	Net Stable Funding Ratio
OLAR	Overall Liquid Adequacy Rule
ORE	Operational Risk Event
PRA	Prudential Regulation Authority
RAS	Risk Appetite Statement
RCSA	Risk Control Self-Assessment
RMF	Risk Management Framework
RWA	Risk Weighted Assets

RWEA	Risk Weighted Exposure Amount
sSA-CCR	Simplified Standardised Approach for Counterparty Credit Risk
SREP	Supervisory Review and Evaluation Process
TCR	Total Capital Requirement
TSCR	Total SREP Capital Requirement
UK-CRR	UK Capital Requirements Regulation
VaR	Value at Risk

1. Overview

1.1 Introduction

Gulf International Bank (UK) Limited ("GIB (UK)" or "the Bank", LEI: 7N7YKE66OZ27KON72O26) is authorised by the Prudential Regulation Authority ("PRA") and regulated by the PRA and the Financial Conduct Authority ("FCA"). The Bank has a branch in New York and is a wholly owned subsidiary of Gulf International Bank B.S.C (Bahrain).

The disclosures in this document have been prepared in accordance with the Disclosure (CRR) Part of the PRA Rulebook and as the PRA has otherwise directed. Revised disclosure requirements were applicable from 1 January 2022 following the UK implementation of the remaining provisions of Capital Requirements Regulation II. In general, comparatives are not provided for new or substantially revised disclosure templates where these are included in these disclosures for the first time.

1.2 Background

The purpose of the capital adequacy regime, as set out in the above framework, is to promote safety and soundness in the financial system. The prudential regulatory framework established by the Basel Committee on Banking Supervision and implemented by the PRA within the UK is structured around three pillars that are designed to promote sound risk and capital management:

- Pillar 1 defines minimum capital requirements that firms are required to maintain for operational, market and credit risk. Banks are required to meet a minimum Common Equity Tier 1 (CET 1) ratio of 4.5% of risk weighted assets (RWAs), a minimum Tier 1 ratio of 5.5% of RWAs and a total capital ratio of 8% of RWAs;
- Pillar 2 defines the supervisory review and evaluation process (SREP) that firms are required to maintain including a requirement to conduct an Internal Capital Adequacy Assessment Process (ICAAP); and
- Pillar 3 underpins market discipline through regulatory disclosure requirements that provide market participants with transparency in relation to a firm's regulatory capital and risk exposures.

1.3 Summary analysis

A high level summary of the key capital and liquidity ratios for GIB (UK) is provided below. Further details on the capital ratios, risk weighted assets (RWAs) and the leverage ratio are presented in Section 5 of this document.

All figures disclosed in sections 1 – 6 are denominated in US dollars, GIB (UK)'s reporting currency. Remuneration disclosures (section 7) are in GBP.

Key metrics (UK KM1)

		$'000	$'000
		T - Current year	T-4 - Prior year
		31-Dec-22	31-Dec-21
	Available own funds (amounts)		
1	Common Equity Tier 1 (CET1) capital	368,416	371,866
2	Tier 1 capital	368,416	371,866
3	Total capital	368,416	371,866
	Risk-weighted exposure amounts		
4	Total risk-weighted exposure amount	1,557,567	1,932,234
	Capital ratios (as a percentage of risk-weighted exposure amount)		
5	Common Equity Tier 1 ratio (%)	23.65%	19.22%
6	Tier 1 ratio (%)	23.65%	19.22%
7	Total capital ratio (%)	23.65%	19.22%
	Additional own funds requirements based on SREP (as a percentage of risk-weighted exposure amount)		
UK 7a	Additional CET1 SREP requirements (%)	5.21%	7.13%
UK 7b	Additional AT1 SREP requirements (%)		
UK 7c	Additional T2 SREP requirements (%)		
UK 7d	Total SREP own funds requirements (%)	13.21%	15.13%
	Combined buffer requirement (as a percentage of risk-weighted exposure amount)		
8	Capital conservation buffer (%)	2.50%	2.50%
UK 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)		
9	Institution specific countercyclical capital buffer (%)	0.08%	0.00%
UK 9a	Systemic risk buffer (%)		
10	Global Systemically Important Institution buffer (%)		
UK 10a	Other Systemically Important Institution buffer		
11	Combined buffer requirement (%)	2.58%	2.50%
UK 11a	Overall capital requirements (%)	15.79%	17.63%
12	CET1 available after meeting the total SREP own funds requirements (%)	10.44%	4.09%
	Leverage ratio		
13	Total exposure measure excluding claims on central banks	5,136,739	5,268,295
14	Leverage ratio excluding claims on central banks (%)	7.17%	7.06%
	Additional leverage ratio disclosure requirements		
14a	Fully loaded ECL accounting model leverage ratio excluding claims on central banks (%)		
14b	Leverage ratio including claims on central banks (%)		
14c	Average leverage ratio excluding claims on central banks (%)		
14d	Average leverage ratio including claims on central banks (%)		
14e	Countercyclical leverage ratio buffer (%)		
	Liquidity Coverage Ratio		
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	9,198,733	6,737,809
UK 16a	Cash outflows - Total weighted value	3,302,507	2,006,717
UK 16b	Cash inflows - Total weighted value	705,128	603,374
16	Total net cash outflows (adjusted value)	2,597,379	1,403,343
17	Liquidity coverage ratio (%)	354.15%	480.13%
	Net Stable Funding Ratio		
18	Total available stable funding	4,297,495	
19	Total required stable funding	1,031,978	
20	NSFR ratio (%)	416.49%	

Total capital

GIB (UK)’s audited profits were $7.1m in 2022 but this was offset by an increased deduction for a defined benefit pension scheme asset that resulted in lower CET 1 than at the prior year end.

Risk weighted assets

RWAs were $374.7m lower than at prior year end related to lower exposures to institutions and to public sector entities in non-equivalent jurisdictions. From 2022 the requirements of UK-CRR Title II (credit risk) have been applied to all balance sheet and off-balance sheet items.

Total SREP capital requirement (TSCR)

The TSCR has decreased from 15.13% to 13.21%.

2. Disclosure policy

2.1 Scope of disclosure

All financial information in this Basel II Pillar 3 document is as at 31 December 2022, our financial year-end with the prior year end comparatives (where applicable). These disclosures have not been subject to external audit except where they are equivalent to those prepared under accounting requirements for inclusion in the annual report and accounts. Disclosures here are in addition to those set out in the GIB (UK) financial statements presented in accordance with International Financial Reporting Standards (IFRS) and the disclosures are based on the information included within the Bank's regulatory return submissions for the year end unless otherwise stated.

2.2 Basis of preparation

2022 Pillar 3 Disclosures are prepared in accordance with the requirements of Part 8 of the Capital Requirements Regulation (UK CRR).

The disclosures are presented using the prescribed disclosure templates in the PRA Rulebook. Row and column references are based on those prescribed in the PRA templates.

All figures and narrative are as at 31 December 2022. Comparative information is disclosed in certain templates based on the previous disclosed reporting period as prescribed in the PRA Rulebook. The previous disclosed reporting period was the year ending 31 December 2021.

GIB (UK) prepares its prudential returns on an identical basis to that used in the financial statements.

2.3 Frequency of disclosure, media and location

GIB (UK) will publish its Pillar 3 disclosures document on an annual basis, in accordance with article 433c (2) of the UK CRR, on the publically accessible website www.gibam.com.

2.4 Board responsibility for risk management and disclosures

A core objective for the Bank is the effective management of risk. The responsibility for identifying and managing the principal risks rests with the Board of Directors, who are also responsible for setting the strategy, risk appetite and controls framework.

In accordance with Part 8 of the UK CRR, and the Bank's Pillar 3 disclosure policy, GIB (UK) is required to ensure that external disclosures portray its risk profile comprehensively. The Directors have considered the adequacy of the Pillar 3 disclosures in relation to these requirements and are satisfied that the risk management systems put in place are adequate with respect to GIB (UK)'s risk profile and strategy.

2.5 Key changes in the 2022 Pillar 3 report

2.5.1 Capital and risk weighted assets

On 14 October 2021, the PRA finalised their implementation of Basel standards through Policy Statement (PS) 22/21, and were implemented from 1 January 2022. The finalised requirements included the introduction of the Simplified Standardised Approach for Counterparty Credit Risk (sSA-CCR art 281 UK-CRR) for banks, such as GIB (UK), that meet the threshold conditions set out in art

273(a)(1) UK-CRR, having a derivatives business that constitute less than (a) 10% of its total assets and (b) £260m (art 281 CRR). sSA-CCR has replaced the mark-to-market method (MTM) for the calculation of derivative exposure values in 2022.

The Bank applies requirements of UK-CRR Title II (credit risk) to all balance sheet assets and any off-balance sheet items. GIB (UK) takes no positions with 'trading intent'. All positions in financial instruments are presumed to be held until maturity and are therefore designated as banking book and derivative transactions are only entered into to hedge interest rate and FX risk in the banking book.

On 13 December 2021, the Financial Policy Committee (FPC) announced that a Countercyclical Capital Buffer (CCyB) rate of 1% for UK exposures had been re-introduced and was applicable from 13 December 2022.

2.5.2 Large exposures

The finalised requirements also included a revised calibration of the capital base and large exposure limits that tightened the definition of eligible capital for large exposures to exclude Tier 2 capital. This had no impact on GIB (UK) given that all its own funds qualify as CET1.

2.5.3 UK Leverage Ratio Framework

From 1 January 2022, UK banks became subject to a single UK leverage ratio requirement meaning that the CRR leverage ratio no longer applies. Under the revised UK leverage ratio framework (UKLRF), central bank claims have been excluded from the UK leverage exposure measure where they are matched by qualifying liabilities (rather than deposits).

GIB (UK) is not, currently, in scope of the Leverage Ratio – Capital Requirements and Buffers Part of the PRA Rulebook which only applies to institutions with £10 billion non-UK assets. However, the Bank monitors leverage on both a current and forecast basis to ensure that the minimum threshold of 3.25% required by the new framework is met. The minimum threshold within the Leverage Framework has been recalibrated with claims on central banks being excluded from the total exposure measure. Claims on Central Banks of $5,109m (2021: $5,339m) have been excluded from the exposure measure.

2.5.4 Disclosures

As part of the introduction of PS 22/21 changes effective from 1 January 2022, a number of mandatory templates for Pillar 3 disclosures have been introduced in line with the updated PRA rulebook (Disclosure (CRR) - Pillar 3 Templates and Instructions). Any new data points will not have comparatives. Comparatives are not provided where there has been a change in the guidelines for disclosures that were reportable for 31 December 2021. Leverage related tables do not have comparatives due to prior period being disclosed on a CRR basis which no longer applies.

The terms RWA and RWEA are used interchangeably throughout the document.

2.6 Future regulatory developments

On 5 July 2022, the FPC announced a further increase in the UK CCyB rate to 2% applicable from 5 July 2023.

Climate change continues to be a risk and the Bank is monitoring proposals on Environmental, Social and Governance (ESG) disclosures. Any new requirements will be incorporated into future Pillar 3 documents.

On 30 November 2022, the PRA released consultation paper CP16/22, Implementation of the Basel 3.1 standards, and confirmed that changes would become effective on 1 January 2025.

2.7 Prudential consolidation

GIB (UK) is a single entity and the scope of disclosures in the financial statements and the prudential returns is identical.

3. Corporate Governance (UK OVB)

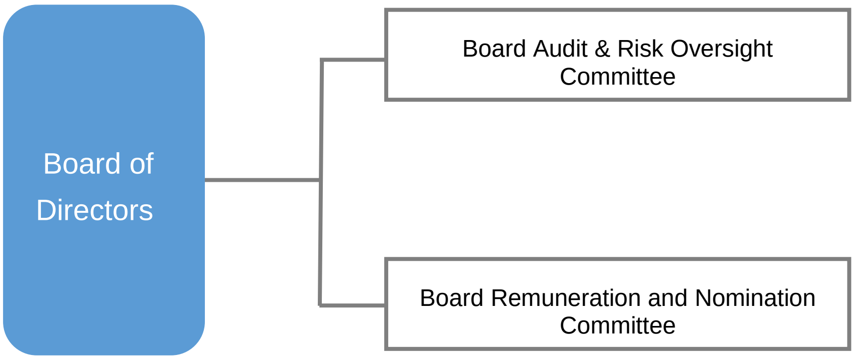
3.1 Corporate structure

GIB (UK) is a 100% owned subsidiary of Gulf International Bank BSC (GIB) (registered in Bahrain), which is itself owned by the Public Investment Fund of Saudi Arabia (97.2%) and the Kuwait Investment Authority (0.73%), Ministry of Finance UAE (0.438%), Qatar Holding Company (0.73%), Bahrain Mumtalakat Holding Company (0.438%) and the Oman Investment Authority (0.438%).

3.2 Governance structure

GIB (UK) has a comprehensive governance framework as set out below.

Board Committees:



Board

The Board of directors are collectively responsible for the leadership, culture and long-term sustainable success of GIB (UK). It is accountable for setting the strategic direction of the Bank, whilst also ensuring its obligations to its customers, employees, regulators, shareholders and other key stakeholders are met.

The Board is also responsible for providing oversight and monitoring the business against the approved strategy, risk appetite and budget, providing challenge and advice to Executive Management as required to enable GIB (UK) to meet its strategic objectives and goals.

The Board is largely composed of non-executive directors to ensure its independence from management and, consequently, to ensure independent judgement on issues brought before it.

Specific Board responsibilities include, but are not limited to, the appointment of directors, the review of financial performance and risk profile of GIB (UK), the approval of GIB (UK)'s strategy and business plans, its financial statements and of the Internal Capital Adequacy Assessment Process (ICAAP), the Internal Liquidity Adequacy Assessment Process (ILAAP), Pillar 3 disclosures, the Recovery Plan and the Resolution Pack.

As at 31 December 2022, the number of other directorships held by Board Members, disclosed in accordance with Article 432(2) of Part 8 of the UK-CRR, are set out below:

Director	Position	Number of directorships
Abdulaziz Al-Helaissi	Chair – Non-independent Non-executive Director	6
Jamal Al-Kishi	Non-independent Non-executive Director	4
Turki Al-Malik	Independent Non-executive Director	11
Abdulla Al-Zamil	Non-independent Non-executive Director	10
Ralph Campbell	Chief Financial Officer	6
Soraya Chabarek	Independent Non-executive Director	1
Katherine Garrett-Cox	Chief Executive Officer	6
Miriam Greenwood	Independent Non-executive Director	9
Gary Withers	Independent Non-executive Director	8
John Xefos	Non-independent Non-executive Director	3

Audit and Risk Oversight Committee (AROC)

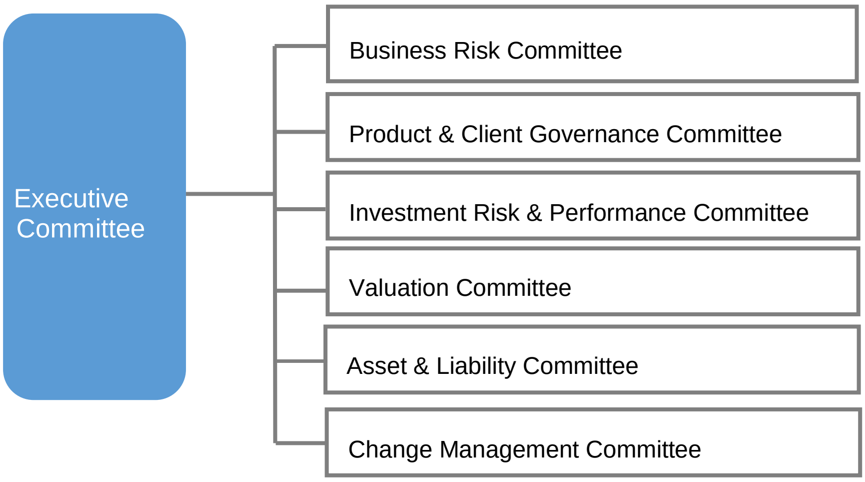
The AROC is a non-executive committee of the Board chaired by an independent Director, and is responsible for assisting the Board on any matters relating to financial affairs, the effectiveness of the risk control and compliance framework companies to ensure that it remains aligned with the board's risk appetite, and that the Board has the management information it needs. The Committee seeks appropriate assurances from Management, the Internal and External Auditors, the Chief Risk and Compliance Officer and the Money Laundering Reporting Officer.

Remuneration and Nomination Committee

The Remuneration and Nomination Committee is a non-executive committee of the Board chaired by an independent director. The purpose of the Nomination and Remuneration Committee is to:

- Lead the process for Director Nominations, ensure plans are in place for orderly succession to both the Board and senior management positions and oversee the development of a diverse plan for succession; and
- Oversee the design of, and recommend to the Board, an overall remuneration policy for GIB (UK) that is aligned with its long term business strategy, its business objectives, its risk appetite and culture and which recognises the interests of relevant stakeholders. It oversees the implementation of, and reviews, remuneration and related policies and the alignment of incentives and rewards with culture.

Executive management



Executive Committee (ExCo)

The purpose of the Executive Committee ("ExCo") is to maintain a reporting and control structure whereby all line operations and other management committees of GIB (UK) are accountable to the Executive directors so as to ensure that all areas of the business are adequately managed, with particular emphasis on business development.

Business Risk Committee (BRC)

The objective of the Business Risk Committee ("BRC") is to assist Senior Management in ensuring that all risks across the business are captured, understood and managed within the firm's risk appetite and to promote an effective risk culture throughout the firm. The BRC oversees the implementation of the Risk Management Framework (RMF) in line with best practice in the industry whilst ensuring that it is aligned with GIB (UK)'s business strategy.

Assets and Liabilities Committee (ALCo)

The purpose of the Assets & Liabilities Committee ("ALCo") is to support the CFO in the management of GIB (UK)'s capital and in the identification, management and control of the bank's balance sheet risks. It is responsible for the implementation of the asset and liability strategy and policy (including limits) for the bank's balance sheet.

All Governance Committees operate to agreed and documented Terms of Reference, objectives, authorities and responsibilities. The Terms of Reference are maintained by each committee Chair and are re-approved on an annual basis.

3.3 Diversity

GIB (UK) believes that a truly diverse workforce, combined with an inclusive culture, is key to maximising business effectiveness. Therefore, the Bank aims to select, recruit, develop and promote talented and engaged people, and encourage the use of their wide range of skills, experiences and perspectives in the furtherance of our business. This holds equally for our Board of Directors.

An effective board needs to include individuals with a mix of skills and experience that are up to date and cover the major business areas in order to make informed decisions and provide effective oversight of risk management. Furthermore, more diverse management bodies can help to improve strategic decision making and effective risk-taking by incorporating a broader range of views, opinions, experiences, perceptions, values and backgrounds.

A more diverse management body and inclusive environment reduces ‘group think’ and ‘herd behaviour’ and promotes creativity and innovation, both of which support the organisation to enhance client service.

The issue of diversity is not limited to gender; it also concerns the age, professional, educational and socio-economic background, and ethnicity/colour and geographical provenance of the members of the management body as well welcoming differing physical abilities and cognitive divergences. All those factors are important aspects to achieving a balanced composition of the management body.

GIB UK’s policy is to ensure that the above aspects of diversity are systematically and thoroughly taken into account in determining its management body. Specifically, this includes:

- Attraction of diverse talent in our recruiting practices;
- Retention of diverse talent through our succession planning; and
- Developing our diverse talent through learning and development opportunities.

Furthermore, GIB (UK) gives particular regard to ensuring that diverse views, opinions and ways of thinking are encouraged as part of the ongoing operation and discussions of the management body, thereby supporting constructive debate and challenge on the range of issues facing the firm.

GIB (UK) has set the following quantitative targets, in line with the FCA’s 2022 Policy Statement:

- At least 40% of the board are women (including those self-identifying);
- At least one of the senior Board positions is a woman; and
- At least one member of the Board is from a non-White ethnic minority background.

The Board, with support from the Nomination and Remuneration Committee, is responsible for compliance with this policy, or, where there are gaps, to explain why. In particular, the Board recognises that a change of a single individual could have a sizeable impact relative to the targets.

4. Risk management (UK OVA)

GIB (UK)'s Risk Management Framework ("RMF") covers policies, procedures, limits, and comprehensive risk measurement and management information systems for the identification, control, monitoring and reporting of financial and non-financial risks.

GIB (UK) is required to comply with the risk management policies of the GIB Group however, GIB (UK) maintains its own governance framework and RMF reflecting both its business model and the external environment and GIB (UK)'s business lines are supported through its own policies and procedures.

GIB (UK) has a five lines model in place which is in accordance with latest best market practice. The five lines are as follows:

- **First line**: Businesses (Treasury & Banking and Asset Management) and support units take risks and operate controls. They are responsible and accountable for the ongoing management of their risks. This includes identifying, assessing and reporting exposures taking into account the Bank's risk appetite and policies;
- **Second line**: Oversight functions – a Risk and Compliance function, with an independent reporting line into the AROC, supports the identification, measurement, monitoring and reporting of risks and oversees the business lines' risk taking activities;
- **Third line**: Internal Audit – Internal Audit provides independent assurance to senior management, board of directors and shareholders on the design and operating effectiveness of internal controls. GIB (UK)'s internal audit function is complemented by Mazars. Internal Audit is not involved in developing, implementing or operating the risk management framework and reports independently to the AROC;
- **Fourth line**: External Audit – GIB (UK)'s external auditors are Ernst & Young. External audit provides independent assurance to senior management, board of directors and shareholders on the firm's financial reporting as well as the systems that support it. The main role of the external audit is the review of financial statements in order to verify that they are a valid as well as a reasonable account of both past financial performance and current financial position and that are consistent with a suitable financial reporting framework. External Audit reports independently to the AROC;
- **Fifth line:** Regulators – The PRA and FCA apply and monitor rules designed to increase transparency and accountability in various areas, such as capital requirements, financial reporting etc. They set the expectations for organizations to follow that are enforced via a continuous process of inspection, review, reporting, and applicable penalties.

Under this model, the second-line does not have the authority to approve or veto the Business decisions to take risks. Its role is to escalate risk exposure or decisions that are, in their opinion, outside of the Board's approved risk appetite, in the first instance to the relevant Senior Manager, and, if necessary, to the Chair of AROC. However, The Money Laundering Reporting Officer has a veto right for on-boarding clients, new counterparties and any transaction that they deem suspicious.

All the five lines contribute to the formation of the required internal control infrastructure and combination of processes and structures toward the enhancement of GIB (UK)'s corporate governance procedures.

4.1 Risk control functions

GIB (UK) has a dedicated Risk and Compliance function, independent of business units headed by the CRCO, who reports to the CEO from a management perspective, the Chair of the AROC from an independent perspective and the Group CRCO from a functional perspective.

The Risk and Compliance function carries out the following activities:

- Developing, maintaining and implementing GIB (UK)'s Risk Management Framework;
- Facilitating the formulation of GIB (UK)'s Risk Appetite Statement ("RAS"), as well as overseeing that risks are managed in line with the Board approved RAS;
- Supporting Risk Assessments in order to identify the key and material risks faced, covering all business and support functions;
- Developing, maintaining and implementing of Risk and Compliance policies and overseeing the development of other Policies;
- Monitoring adherence to internal limits / triggers and compliance with ratios to maintain alignment with regulatory requirements and internally set parameters (for example Key Risk Indicators and Early Warning Indicators) and policies;
- Monitoring adherence to applicable laws and regulations across GIB (UK)'s business activity, taking into account the UK and other regulatory requirements and tracking recommendations through to completion;
- Providing analysis on risk reporting covering the key risks to Board and Management, as well as address any reporting needs to meet regulatory requirements. Providing updates to Board and Management on regulatory change management, compliance monitoring and regulatory training;
- Overseeing the business continuity planning and operational resilience process to ensure the organisation as a whole remains viable in the event of any incident. This includes facilitating table top 'fire drills';
- Defining the annual Risk and Compliance training plan for GIB (UK) staff covering key regulations and risk processes. Leading the delivery of the training plan;
- Establishing and maintaining an effective regulatory change management framework to identify, assess and support the implementation of new regulatory requirements by the first line; and
- Ensuring regulatory communications are answered promptly, liaising with the regulators regarding Senior Managers approval and regulatory visits.

4.2 Management of key risks

4.2.1 Credit risk (UK CRA)

Credit risk is the risk that a customer, counterparty or an issuer of securities or other financial instruments fails to perform under its contractual payment obligations thus causing GIB (UK) to suffer a financial loss.

Credit Risk faced by GIB (UK) arises through two broad categories, counterparty risk and issuer risk:

i. Counterparty credit risk is the risk that a counterparty fails to fulfil its contractual obligations as they fall due, as a result of deterioration in its credit status, including default and/ or insolvency; and

ii. Issuer risk is the risk that the issuer of a security defaults on its obligations to pay coupons or the principal due on the security, as a result of deterioration in its credit status, including default and/or insolvency.

GIB (UK) is exposed to counterparty credit risk in respect to its money market placements, un-cleared derivative transactions and reverse repo transactions. GIB (UK) is exposed to issuer risk through positions held on the proprietary bond investment portfolio.

Where appropriate, GIB (UK) seeks to minimise its credit exposure using a variety of techniques including, but not limited to, the following:

- All money market placement, derivative and reverse repo transactions are conducted with highly rated financial institutions;
- Entering into transactions in derivatives, foreign exchange instruments, repos and reverse repos on the terms of industry standard documents, such as ISDAs and CSAs and GMRAs, respectively;
- Obtaining collateral of high quality; and
- Investing in bonds issued by issuers of high credit quality.

GIB (UK) has established risk appetite levels which are within the overarching parameters set out in the GIB Group Risk Appetite policy and adjusted to comply with both UK regulatory requirements and the business model. This results in an assessment of credit risk determined by varying tolerance levels based on factors including, but not limited to, product type, geographic location, credit quality and tenor of exposures. These appetite metrics form the basis upon which maximum exposure limits are derived as part of the governance framework to measure, mitigate and manage credit risk within the GIB (UK)'s risk appetite.

The Board has established a Credit Risk Management Policy, which includes a risk based internal credit assessment process that provides internal credit risk ratings for approval of credit limits. Group-wide credit limit setting and approvals are conducted within the Board-approved guidelines, and the measurement, monitoring and control of credit exposures are undertaken on a Group-wide basis in a consistent manner.

In line with the credit risk management policy, all counterparties are subject to an annual credit review process and credit profiles are monitored through an internal credit-monitoring tool, which tracks changes in external credit ratings and credit default swap spreads.

The utilisation of Credit Risk limits is monitored by Group Credit Administration under an intra-group service agreement and any breaches are escalated to GIB (UK) Treasury and Risk.

GIB (UK) Credit Risk reports on credit risk to the ALCO on a monthly basis and the AROC on a quarterly basis.

Provisions

IFRS 9 requires GIB (UK) to record an allowance for expected credit loss (ECL) for all loans and other debt financial assets not held at fair value through profit and loss (FVTPL). The allowance is based on the ECLs associated with the probability of default in the next twelve months unless there has been a significant increase in credit risk in which case the allowance will be for the lifetime ECL.

- **Stage 1:** For financial instruments where there has not been a significant increase in credit risk since initial recognition and that are not credit-impaired on origination, GIB (UK) recognises an allowance based on the 12-month ECL;
- **Stage 2**: For financial instruments where there has been a significant increase in credit risk since initial recognition but are not credit-impaired, GIB (UK) recognises an allowance for the lifetime ECL; and

- **Stage 3**: For credit-impaired financial instruments, GIB (UK) recognises the lifetime ECL.

As at 31 December 2022 GIB (UK) has a Stage 1 expected credit loss provision balance of $494k (2021: $375k) on placements and securities. GIB (UK) has zero ECL for stage 2 and 3.

4.2.2 Market risk (UK MRA)

Market risk is defined as the risk of losses arising from adverse movements in market prices.

GIB (UK) takes no positions with 'trading intent' (defined as a position taken with the intent of short-term resale or with the intention of benefiting from actual or expected short-term price differences between buying and selling prices, or from other price or interest rate variations). Financial instruments are presumed to be held until maturity and are therefore designated as banking book. Interest rate and foreign exchange rate derivatives and forward FX transactions are only entered into to hedge interest rate and FX risk arising in the banking book.

The Bank is exposed to interest rate and foreign exchange risk and these risks are actively managed within limits, using hedging instruments such as interest rate and FX swaps. Since hedging is undertaken within a limits framework there is some residual market risk.

Market risk due to FX is measured using a VaR methodology. VaR is calculated on a daily basis by Group Finance under an intra-group Service Agreement. Interest rate risk is assessed according to the PRA's IRRBB guidance.

GIB (UK) has established risk appetite levels, which are within the overarching parameters set out in the GIB Group Risk Appetite policy and adjusted to comply with UK regulatory requirements and business model.

Potential limit breaches are escalated to GIB (UK)'s Risk and Treasury departments.

GIB (UK) Risk reports on market risk to the ALCO on a monthly basis and the AROC on a quarterly basis.

4.2.3 Operational risk (UK ORA)

Operational risk is defined as the risk of loss arising from inadequate or failed internal processes, people and systems or from external events, whether intentional, unintentional or natural. This includes legal risk, but excludes strategic and reputational risks.

Operational Risk arises across business lines through the normal course of business, and is generally deemed higher for new, complex or manual processes.

Operating Model

GIB (UK) has implemented a structured framework for the ongoing management of operational risk in line with the Operational Risk Policy.

The Operational Risk operating model in GIB (UK) covers the following components:

- Operational Risk Event data collection and analysis;
- External event data collection and analysis;
- Key Risk Indicators;
- Risk and Control Self-Assessments;
- Scenario Analysis events;
- Risk Mitigation Action Plans tracking; and

- Operational RA.

This model is tailored to meet GIB (UK)'s needs and sets out the requirements for the key stakeholders to perform their roles in order to fulfil their responsibilities.

The operational risk processes underpinning the Bank covers two different and complementary viewpoints:

- **Preventative Controls.** The "ex-ante" point of view, which involves identifying, assessing and prioritising potential operational risks to enable their mitigation. From this standpoint, Operational Risk is managed in a proactive and preventive way by the risk entities exposed. Operational risk management is integrated into the day-to-day decision making process and is focused on the analysis of the causes of Operational Risk to enable its mitigation; and
- **Detective Controls.** The "ex-post" point of view, which involves assessing the exposure to Operational Risk and measuring its consequences, i.e. the historical cost of the events that have occurred. From this perspective, Operational Risk management uses tools associated with the consequences of Operational Risk not only to complement Operational Risk management, but also to feed the calculation of capital use for Operational Risk.

Risk and Control Self-Assessments ("RCSA")

A comprehensive RCSA programme is undertaken covering both front office and support functions as well as the second line of defence. The BRC has oversight of the assessment and controls in place to identify high risk or emerging risks to GIB (UK).

RCSA overview, Inherent vs Residual Risk Distribution

Each Business Unit is responsible for performing an RCSA in-line with the BRC agreed plan.

The RCSA methodology for identification of operational risks is set out by risk in the Operational Risk policy and the resulting risks are assessed using a likelihood and impact assessment matrix, which assigns a Low, Medium, High and Critical rating.

The Risks identified through the RCSA process are mapped to the Basel II risk taxonomy to allow further trend analysis and links to other Operational Risk tools such as Operational Risk Events.

Key Risk Indicators (KRI)

Respective business functions, with facilitation from Operational Risk, establish a set of KRIs for operational risk monitoring purposes, which reflect the key risks identified through the risk appetite statement.

The frequency and threshold of each KRI is defined in consultation with the Operational Risk department and are reviewed and ratified by the BRC.

Key operational risk indicators are monitored and reported monthly to the BRC and quarterly to the AROC via the Risk & Compliance dashboard.

Risk mitigation plans are established by the respective owners in consultation with Operational Risk for any KRI breaching its pre-defined threshold.

Operational Risk Events (OREs)

In GIB (UK), operational risk events arise when operational risk materialises, either because of a breakdown in a process or failure to follow control procedures, a failure or absence of a control or an external cause. Some operational risk events have either a financial or non-financial impact (e.g. Regulation, Customers, Staff and Reputation) whilst others do not have an impact but have the potential to do so (near misses).

In GIB (UK), all operational risk events regardless of the value of the operational loss are formally reported and investigated, these include all loss events as well as:

Near-Miss Events

An incident which had the potential to cause damage to the Bank but did not materialise due to an action of a 'non-routine' nature being taken (i.e. an action occurred outside the standard controls in place to manage the risk).

Boundary Event

A boundary event is an event triggered through another risk category (i.e. Credit, Market or Liquidity risk) which includes an element of operational risk to which a loss might be attributed.

If a control inside GIB (UK) works as designed and picks up and prevents a potential error, it is not considered an operational risk event.

Reporting and escalation

On discovering an event, all staff should report to their department head and Risk and Compliance within 24 hours of identification.

First-line will perform an immediate investigation to ascertain what happened and what immediate action is required to address the issue in order to minimise the negative impact on GIB (UK) or its clients.

Department heads will report all OREs via a predefined template, including root cause and preventative actions within 72 hours of an event being identified.

The Event Owner in second-line performs an impact assessment in line with the predefined impact classification matrix. This will lead to a rating of low, medium or high, taking into consideration both financial and non-financial impact and, where possible, potential impact.

Operational Risk will review and challenge all ORE reports. They will speak to those involved and seek enrichment of the report with additional details where required.

All high and medium ORE reports will be discussed in detail at the BRC, and departmental heads will be expected to present updates on mitigation actions at this forum. High and medium events are reported to the AROC via the Risk and Compliance Dashboard on a quarterly basis.

Historical Losses

Historically, GIB (UK) has seen a low level of operational events and losses. Over the last 10 years, the historical average loss amount is $5,148 (calculated as the total value of losses divided by the number of operational loss events). The highest single loss was $149,704.

4.2.4 Liquidity and Funding Risk

Liquidity risk is the risk that sufficient funds are not available to meet GIB (UK)'s financial obligations when they fall due. GIB (UK) financial obligations arise from doing business as a financial institution, for example paying our depositors, posting margin or paying operational expenses.

Funding risk is the risk that the bank is not able to attract deposits or obtain funding in order to purchase income generating assets.

GIB (UK)'s liquid resources are primarily comprised of:

- Cash and short dated interbank placements; and
- A liquidity buffer, which consists of eligible buffer assets, as defined by the UK regulator, including deposits with the BoE and the Fed and marketable securities.

GIB (UK) also has an asset monetization programme where an asset's liquidity is tested by utilising the Fed's repo facility, posting securities in exchange for liquid funds. This test is performed at least annually and results are presented to ALCO.

The Board has established a Liquidity Risk Management Policy to ensure that the Bank has access to adequate funds to meet its obligations, even under adverse conditions. In normal conditions, the objective is to ensure that there are sufficient funds available not only to meet current financial commitments but also to provide the flexibility to capitalise on opportunities for business expansion. These objectives are met through the application of a prudent mix of liquidity controls.

Liquidity stress testing is performed on a daily basis via the OLAR calculation and these parameters are reviewed on an annual basis as part of the ILAAP.

GIB (UK) Risk reports on liquidity risk to the ALCO on a monthly basis and the AROC on a quarterly basis.

4.2.5 Credit Concentration Risk

Credit Concentration Risk is the risk of losses arising from concentrations of exposures due to imperfect diversification.

GIB (UK)'s Treasury desk operates under Credit and Concentration limits prescribed in GIB (UK)'s RAS, which is approved by the Board. The risk appetite defines the instrument limits and tenors that GIB (UK) can invest in.

Credit concentration risk is reported monthly to ALCO and quarterly to the AROC.

4.2.6 Interest Rate Risk in the Banking Book (IRRBB)

Interest rate risk is the potential adverse impact on the Bank's future cash flows from changes in interest rates associated with banking book items.

The differing interest rate risk characteristics of GIB (UK)'s assets and liabilities when Treasury accepts deposits with a certain maturity in a certain currency and places them at different maturity and/or in a different currency may give rise to the following risks:

- Duration risk arising when the re-pricing of banking products (assets and liabilities) is mismatched across time buckets;
- Basis risk arising when banking book positions re-price in relation to different reference rates; and
- Optionality arising from any discretion customers and counterparties have in respect of their contractual relations with the bank, including prepayment risk on fixed rate loans and deposits (not material in GIB's business model).

IRRBB is monitored and assessed in line with the guidance set-out in the PRA Rulebook.

4.2.7 Business and Strategic Risk

Business risk is the risk to the bank's business model caused by uncertainty in the macroeconomic environment, with specific consideration given to earnings volatility and cost overruns in severely adverse conditions. Business risk is managed with a long-term focus and is assisted by careful development of business plans, appropriate management oversight and an embedded corporate governance framework. Strategic risks are those that are most consequential to the organisation and threaten to its ability to meet its purpose and deliver its vision.

For GIB (UK) there are two principal lines of business:

(i) Treasury & Banking; and

(ii) Asset Management.

For Treasury & Banking, our business is very clearly driven by our customers' requirements. If these requirements reduce to a position where the revenues do not cover the costs generated, then the Bank would need to reduce costs. The main business risk facing Treasury is the narrow business model, and hence it is vulnerable to changes in demand from clients.

For Asset Management, as most mandates are currently passive, the main business risk is the vulnerability of revenue to market values. When asset values fall significantly GIB (UK) has to process a broadly similar number of transactions while receiving a fee based on the lower value of assets under management.

The main strategic risks are those associated with the development of new clients, products, and embedding sustainability across the business. In particular, as GIB (UK) looks to diversify its products, there is a risk that it misjudges the value proposition for clients, inadequately assesses target market needs or is unable to leverage distribution channels effectively. In fulfilling its vision to be a responsible investment provider there is a risk of reputational damage if GIB (UK) fails to live up to its vision, either through its own actions or via association with the wider Group. Further, GIB (UK) maintains a Key Risk Register that monitors current and emerging risks, which is reviewed at least quarterly.

4.2.8 Conduct Risk

Conduct Risk is the risk that the action of a firm leads to client detriment, poor client outcomes or negative impact on market stability. It arises when employees do something they should not do, or do not do something they should be doing, and can be driven by poor organisational culture.

GIB (UK) through its Code of Conduct and Culture Framework establishes a risk culture that not only addresses the risk of misconduct but also highlights clear accountability of actions through a preventive approach.

GIB (UK) has embedded Conduct Risk in its Risk Management framework and has incorporated behaviour and conduct in its annual performance appraisal and certification processes.

GIB (UK) Compliance & Risk department reports conduct risk indicators, including any Human Resources or market conduct issues, to the BRC on a monthly basis and to the AROC and the Board on a quarterly basis.

4.2.9 Group Risk

GIB (UK) outsources a number of services to GIB BSC and manages this risk through a 'Service Level Agreement', which is reviewed annually. GIB (UK) acknowledges and accepts the significant reliance on Group to support the business model for GIB (UK) Treasury and Banking activities. Group supports the following activities:

- Credit Risk - All exposures are monitored by Group against agreed Credit Limits for GIB (UK);
- Market risk - Group measures and reports VaR exposures for FX position using Murex. This includes the stress testing of positions and VaR back testing;
- Operations - Operations staff based in KSA support the Treasury & Banking activity; and
- Systems - GIB (UK) are reliant on Group for accounting, treasury and banking systems.

GIB (UK) recognises that it places significant reliance on GIB BSC as an outsourced services provider.

4.3 Risk culture

Underpinning the effectiveness of the RMF is a strong risk culture which sets the tone for the Bank and influences the risk consciousness of employees as they conduct their daily activities and pursue business objectives.

The risk culture of GIB (UK) will ensure that all business functions and employees consider risk management and consult appropriately with the Risk Function during the development of any new products, procedures, policies, and systems.

4.4 Adequacy of risk management arrangements

The Board is ultimately responsible for the bank's systems and controls and for reviewing the effectiveness of those arrangements. However, such arrangements are designed to mitigate, not eliminate, risk and therefore can provide only reasonable, but not absolute, assurance against fraud, material losses or financial misstatements.

The bank has developed a Risk Management Framework (RMF), which is reviewed and approved at least annually by the Board, to provide guidance to the business on how risks should be managed and to ensure that the bank's risk management systems and controls are adequate.

The Board considers that its risk management arrangements, including its risk management systems and controls, are adequate with regards to the Bank's profile and strategy.

5. Own funds

5.1 Composition of own regulatory funds (UK CC1)

Own funds as at 31 December 2022 are summarised below.

The Bank's regulatory capital consists entirely of CET 1 capital made up of fully paid up ordinary shares, audited retained earnings and other reserves.

The Bank is a wholly owned subsidiary of Gulf International Bank BSC (the parent Company) incorporated in the Kingdom of Bahrain.

		31-Dec-22 $'000	
	Common Equity Tier 1 (CET1) capital: instruments and reserves		
1	Capital instruments and the related share premium accounts	250,000	
	of which: called up share capital	*250,000*	a
2	Retained earnings	135,293	b
3	Accumulated other comprehensive income (and other reserves)	33,390	c
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**418,683**	
	Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7	Additional value adjustments	(187)	d, e, h
8	Intangible assets (net of related tax liability)	(219)	f
15	Defined-benefit pension fund assets (negative amount)	(49,862)	g
28	**Total regulatory adjustments to Common Equity Tier 1 (CET1)**	(50,268)	
29	**Common Equity Tier 1 (CET1) capital**	**368,415**	
60	**Total Risk exposure amount**	**1,557,567**	
	Capital ratios and buffers		
61	Common Equity Tier 1 (as a percentage of total risk exposure amount)	23.65%	
62	Tier 1 (as a percentage of total risk exposure amount)	23.65%	
63	Total capital (as a percentage of total risk exposure amount)	23.65%	
64	Institution CET1 overall capital requirement (CET1 requirement in accordance with Article 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Article 104(1) CRD, plus combined buffer requirement in accordance with Article 128(6) CRD) expressed as a percentage of risk exposure amount)	15.79%	
65	of which: capital conservation buffer requirement	2.50%	
66	of which: countercyclical buffer requirement	0.08%	
68	**Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)***	16.22%	
	Amounts below the thresholds for deduction (before risk weighting)		
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	342	i

Notes:

The references (a) – (i) identify balance sheet components in table CC2 – Reconciliation of regulatory capital to balance sheet which are used in the calculation of regulatory capital.

* Represents, as a percentage, the level of CET1 capital left available to meet buffer requirements after subtracting the minimum amount of CET1 capital required to meet total Pillar 1 plus Pillar 2A capital requirements, also referred to as total SREP own funds requirements. The minimum CET1 requirement is equivalent to 4.5 per cent of risk weighted assets (Pillar 1) plus the additional CET1 SREP requirement (56.25 per cent of the Pillar 2A capital requirement). However, as GIB (UK)'s capital instruments qualify exclusively as CET 1 it must use CET 1 capital to meet the minimum requirements beyond the extent to which the regulations mandate. The surplus reported takes this into account.

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5.2 Reconciliation of regulatory own funds to balance sheet in the audited financial statements (UK CC2)

		31-Dec-22 $'000	Ref
Assets - *Breakdown by asset class according to the balance sheet in the published financial statements*			
1	Cash and cash equivalents	5,325,978	
2	Placements with banks	3,661,166	
3	Trading securities	73,490	d
4	Derivative financial asset	69,607	e
5	Debt securities at amortised cost	983,131	
6	Property, plant and equipment	3,915	f
7	Right-of-use assets	25,740	
8	Other assets	115,596	g
9	Current tax receivable	918	
10	**Total assets**	**10,259,541**	
Liabilities - *Breakdown by liability class according to the balance sheet in the published financial statements*			
1	Deposits from banks	370,965	
2	Deposits from customers	9,323,428	
3	Derivative financial liability	43,543	h
4	Deferred tax liability	5,032	
5	Other liabilities	97,890	
6	**Total liabilities**	**9,840,858**	
Shareholders' Equity			
1	Share capital	250,000	a
2	Capital contribution	2,279	b
3	Retained earnings	133,014	b
4	Pension reserves	33,390	c
5	**Total shareholders' equity**	**418,683**	

Notes:

The table above presents GIB (UK)'s accounting balance sheet as at 31 December 2022 which forms the basis for the calculation of the Bank's regulatory own funds as presented in table CC1. There is no difference between the Bank's accounting and regulatory balance sheets.

The references (a) to (h) identify regulatory balance sheet components that link initially to items disclosed in table CC1, prior to the application of regulatory definitions and adjustments per the rules for calculating own funds.

Deferred tax assets that do not rely on future profitability and result from temporary timing differences have not been deducted from deferred tax liabilities in the calculation of own funds but are risk weighted.

6. Capital requirements

6.1 Pillar 1 approach

The Bank calculates its Pillar 1 own funds requirements using the following approaches:

Risk category	Pillar 1 approach
Credit risk	Standardised approach under Chapter 2, Title II, Part Three of the CRR
Counterparty risk	The Simplified standardised approach for counterparty credit risk under Section 4 of Chapter 6 of Title II, Part Three of the CRR
CVA risk	The standardised method under section 4 of Chapter 6 article 384, Title VI, Part Three of the CRR
Operational risk	The standardised approach under Chapter 3, Title III, Part Three of the CRR
Market risk: - Foreign exchange risk	Standardised approach under Chapter 3, Title IV, Part Three of the CRR

Capital requirements are actively managed and regulatory ratios, including leverage, are a key factor in GIB (UK)'s internal risk appetite management.

6.2 Pillar 1 capital requirements (UK OV1)

The following table sets out the total risk-weighted exposure amounts and the corresponding total own funds requirement determined in accordance with Article 92, to and broken down by the different risk categories set out in Part Three of the CRR.

		Risk weighted exposure amounts (RWEAs)		Total own funds requirements
		$'000	$'000	$'000
		T - Current year	T-4 - Prior year	T - Current year
		31-Dec-22	31-Dec-21	31-Dec-22
1	Credit risk (excluding CCR)	1,426,851	1,633,319	114,148
2	Of which the standardised approach	1,426,851	1,633,319	114,148
3	Of which the foundation IRB (FIRB) approach			
4	Of which slotting approach			
UK 4a	Of which equities under the simple riskweighted approach			
5	Of which the advanced IRB (AIRB) approach			
6	Counterparty credit risk - CCR	42,424	35,645	3,394
7	Of which the standardised approach			
8	Of which internal model method (IMM)			
UK 8a	Of which exposures to a CCP			
UK 8b	Of which credit valuation adjustment - CVA	20,625	12,553	1,650
9	Of which other CCR	21,799	23,092	1,744
15	Settlement risk			
16	Securitisation exposures in the non-trading book (after the cap)			
17	Of which SEC-IRBA approach			
18	Of which SEC-ERBA (including IAA)			
19	Of which SEC-SA approach			
UK 19a	Of which 1250%/ deduction			
20	Position, foreign exchange and commodities risks (Market risk)	2,332	166,380	187
21	Of which the standardised approach	2,332	166,380	187
22	Of which IMA			
UK 22a	Large exposures			
23	Operational risk	85,961	96,890	6,877
UK 23a	Of which basic indicator approach			
UK 23b	Of which standardised approach	85,961	96,890	6,877
UK 23c	Of which advanced measurement approach			
24	Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)			
25				
26				
27				
28				
29	**Total**	**1,557,567**	**1,932,234**	**124,605**

6.3 Use of External Credit Assessment Institutions ("ECAI")

GIB (UK) uses ratings assigned by the following three PRA approved ECAI's: Standard & Poor's Rating Group, Moody's Investors Services and Fitch Group when calculating the credit risk requirements under the standardised approach to rated counterparties. External credit assessments have been applied for the following classes of exposures: Central governments, multilateral development banks, Institutions, Corporates, and Other assets to determine the relevant "Credit Quality Step" and consequent risk weight.

6.4 Pillar 2 capital requirements

Pillar 2a capital is held for risks that are either not captured, or not fully captured, under the Pillar 1 calculations. GIB (UK) undertakes an ICAAP, which involves a forward-looking assessment to ascertain the Pillar 2 capital requirement.

A Pillar 2a capital requirement sets out the additional regulatory capital as determined by the PRA, through the issuance of a firm specific Total Capital Requirement (TSCR), following a review of the ICAAP, as part of the Supervisory Review and Evaluation Process (SREP). The Pillar 2A requirement must be met with at least 56.25% CET 1 capital. It is expressed as a percentage of RWAs.

As at 31 December 2022, the Bank's Total Capital Requirement (Pillar 1 + Pillar 2A), set by the PRA was 13.21% (2021: 15.13%).

The PRA has not set an additional supervisory buffer.

6.5 Capital buffers

The Bank is required to hold additional capital in the form of CRD IV capital buffers. These buffers must be met entirely with CET 1 capital.

6.5.1 Capital Conservation Buffer (CCoB)

The CCoB, at 2.5% of RWAs, applies to banks and has been developed to ensure capital buffers are available which can be drawn upon during periods of stress if required.

6.5.2 Countercyclical Buffer (CCyB)

The CCyB is intended to protect the banking sector against potential losses when excess credit growth is associated with an increase in system wide risks. The CCyB is a charge on relevant credit exposures defined as lending to exposure classes (g) to (q) as defined in CRR article 112.

GIB (UK) is not engaged in extending credit to the wider economy, consequently the CCyB only applies to a proportion of its activities. The charge is applied to 9.8% (2021: 9.6%) of its total exposures making up 50.0% (2021: 42.6%) of credit risk weighted assets.

In each jurisdiction the relevant authority (the Bank of England in the UK) sets an individual CCyB rate based on their assessment of systemic risks in that jurisdiction. Accordingly, each institution calculates a specific CCyB based on a weighted average of the CCyB rates for each jurisdiction in which it has an exposure.

The UK CCyB was 0% until 13th December 2021 when it was raised to 1%. A further 1% rise is scheduled to take place on 5th July 2023.

As of 31 December 2022, GIB (UK) had a CCyB of $1.3m (2021: nil) and hence a weighted average CCyB rate of 0.08% (2020: 0%).

6.6 Leverage ratio (LR)

The leverage ratio is defined as the ratio of Tier 1 capital to the total leverage ratio exposure measure. The leverage ratio exposure measure applies an equal weighting to all assets and therefore provides a complementary capital framework which is not exposed to the inherent errors and uncertainties in measuring risk by assigning risk weights.

The UK Leverage Framework that applied to the Bank from 1 January 2022 excludes qualifying central bank claims from the exposure measure as set out in the FPC's 2015 Policy Statement.

This change was introduced to ensure that the framework does not act as a barrier to the effective implementation of monetary policy measures or as a disincentive for institutions to use central bank liquidity facilities.

GIB (UK)'s leverage ratio as at 31 December 2022 was 7.17%.

7. Remuneration

7.1 General

GIB (UK) is regulated by both the PRA and the FCA and is subject to the regulations on remuneration from the UK Financial Services Regulators - primarily the FCA Remuneration Code and the PRA Remuneration Regulations as aligned, under the Disclosure (CRR) Part of the PRA Rulebook, to the Capital Requirements Regulation (Article 450).

This statement sets out the disclosures required under the requirements as they apply to the Bank and this narrative reflects our disclosure as part of REMA 1 to 4. The Bank is classified as a Non-listed 'other institution' under the Disclosure (CRR) Part of the PRA Rulebook.

The average number of permanent staff employed by the Bank during the year ended 31 December 2022 was 93 (2021: 84).

7.2 Decision making process (Ref: Article 450(1) (a)

GIB (UK) has a Nomination and Remuneration Committee (NRC) which is a sub-committee of the Board. Its terms of reference are as follows:

i. Membership

The Committee consists of not fewer than two non-executive directors appointed by the Board, one of whom shall be appointed Chair of the NRC by the Board. Executive Directors of GIB (UK) are not eligible to be members of the Committee. The Chair of the Board is not eligible to be Chair of the Committee. The Chair should have been a member of a Remuneration Committee for a minimum of twelve months prior to their appointment as Chair.

ii. Duties

The Committee is responsible for:

- Leading the process for Director Nominations, ensuring plans are in place for orderly succession to both the Board and senior management positions, and overseeing the development of a diverse pipeline for succession; and
- Overseeing the design of, and recommending to the Board, an overall remuneration policy for GIB UK that is aligned with its long term business strategy, its business objectives, its risk appetite and its culture, and one that recognises the interests of relevant stakeholders. It oversees the implementation of, and reviews, remuneration and related policies and the alignment of incentives and rewards with culture.

iii. Meetings

The Committee meets at least twice a year. Two members constitute a quorum. The Committee minutes its proceedings. In addition to the members, and as agreed by them, other directors and managers may be invited to attend the meetings.

7.3 Link between pay and performance (Ref: Article 450(1)(b)

All staff receive a fixed and a variable component to their remuneration. The variable component is based on the performance of the individual and the firm as a whole and is entirely discretionary.

The variable component of an individual's remuneration is designed to reward members of staff for good performance and to incentivise continued good performance in the future. In determining the quantum of the variable component various factors are taken into consideration, which depend on the nature of the individual's role in the firm. Individuals engaged in business lines will be assessed on their net profit contribution to the firm, however the risk taken in achieving that performance will be factored into the assessment along with the transparency and certainty of the profits arising. They are also assessed on their overall contribution to the firm. Individuals engaged in risk, control and support functions are assessed on the achievement of objectives and meeting key performance criteria.

7.4 Design Characteristics (Ref: Article 450(1)(c)

GIB (UK) considers that the appropriate level of remuneration is essential to enhancing the long term interests of GIB (UK)'s employees and stakeholders.

GIB (UK)'s Policy on remuneration is dictated by the need to attract, retain and motivate quality staff and it is understood that GIB (UK)'s success will be dependent on this aim being achieved as our main asset is our people.

GIB (UK)'s remuneration strategy and design is to:

- Keep the total fixed and variable remuneration package in line with the median of its peers (Peers being identified as Level 2 and Level 3 foreign banks and Asset Managers);
- Ensure remuneration is fair and competitive so employees value their level of compensation and our policies are equitable for employees irrespective of their diversity characteristics;
- Enable GIB (UK) to effectively manage its costs;
- Take into account performance, behaviours and risk;
- Ensure remuneration design takes into account best practice of simplicity, clarity, predictability and proportionality; and
- Enables variable remuneration to be aligned with the delivery of our strategy and our commitment to diversity and equality, sustainability, our net zero commitment and targets.

GIB (UK) has a robust framework in place to ensure that the level and composition of remuneration is reasonable and both clearly and measurably linked to performance, is appropriate for results achieved and encourages behaviour consistent with GIB (UK)'s Values and Behaviours that leads to excellence and the appropriate balance in financial performance, governance, controls, risk management (including sustainability risk and climate risk), client service, people management, brand and reputational management. All employees are assessed on their contribution to the Bank's culture and conduct additionally, where it is relevant to their role, they will be assessed on their contribution to, or support for, our Climate Risk Management Strategy.

Consequently, GIB (UK) has an annual process in place to review whether any risk-adjustment of relevant performance measures is required and to identify and monitor risk scenarios that could affect remuneration.

Additionally, although GIB (UK), due to our level of firm, is able to dis-apply the rules relating to deferral and payment in instruments, we have opted to voluntarily implement an element of deferral for various roles, aligned to best practice.

7.5 Ratio between Fixed and Variable Remuneration (Ref: Article 450(1)(d)

Under CRD V, variable remuneration should not exceed 100% of fixed remuneration or up to 200% of fixed remuneration where this has been approved by shareholders.

7.5 Aggregate remuneration information (in GBP) for Material Risk Takers (Ref: Article 450(1)(h), 450(1)(h)(i),(ii), (iii), (iv), (v),(vi), (viii), REM1 to 4)

GIB (UK) maintains a list of all Material Risk Takers (MRTs) in compliance with applicable regulations. MRTs are categories of staff whose professional activities have a material impact on the risk profile of firms. GIB (UK) has listed those individuals who are MRTs in the MRT framework, following the Regulators' guidance on who should be identified as an MRT.

As at close on 31 December 2022, the Bank had 32 MRTs (33 during the course of 2022).

Outlined below is the quantitative information required for this disclosure – REM 2 to 4.

As at 31 December 2022:

			a	b	c
	Gbp£		MB Supervisory function	MB Management function & Other senior management	Other identified staff
1	Fixed remuneration*	Number of identified staff	9	10	14
2		Total fixed remuneration	£216,167	£2,662,344	£2,047,596
3		Of which: cash-based	£216,167	£2,662,344	£2,047,596
4		(Not applicable in the UK)			
UK-4a		Of which: shares or equivalent ownership interests	£0	£0	£0
5		Of which: share-linked instruments or equivalent non-cash instruments	£0	£0	£0
UK-5x		Of which: other instruments	£0	£0	£0
6		(Not applicable in the UK)			
7		Of which: other forms	£0	£0	£0
8		(Not applicable in the UK)			
9	Variable remuneration	Number of identified staff	9	10	14
10		Total variable remuneration	£0	£2,546,704	£936,625
11		Of which: cash-based	£0	£1,333,682	£733,675
12		Of which: deferred	£0	£1,213,022	£202,950
UK-13a		Of which: shares or equivalent ownership interests	£0	£0	£0
UK-14a		Of which: deferred	£0	£0	£0
UK-13b		Of which: share-linked instruments or equivalent non-cash instruments	£0	£0	£0
UK-14b		Of which: deferred	£0	£0	£0
UK-14x		Of which: other instruments	£0	£0	£0
UK-14y		Of which: deferred	£0	£0	£0
15		Of which: other forms	£0	£0	£0
16		Of which: deferred	£0	£0	£0
17	Total remuneration (2 + 10)		£216,167	£5,209,048	£2,984,221

Fixed Remuneration = salary, pension and benefits

		a	b	c
		MB Supervisory function	MB Management function & Other senior management	Other identified staff
	Guaranteed variable remuneration awards			
1	Guaranteed variable remuneration awards - Number of identified staff	0	0	0
2	Guaranteed variable remuneration awards -Total amount	0	0	0
3	Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	0	0	0
	Severance payments awarded in previous periods, that have been paid out during the financial year			
4	Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff	0	0	0
5	Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount	0	0	0
	Severance payments awarded during the financial year			
6	Severance payments awarded during the financial year - Number of identified staff	0	0	0
7	Severance payments awarded during the financial year - Total amount	0	0	0
8	Of which paid during the financial year	0	0	0
9	Of which deferred	0	0	0
10	Of which severance payments paid during the financial year, that are not taken into account in the bonus cap	0	0	0
11	Of which highest payment that has been awarded to a single person	0	0	0

		a	b	c	d	e	f	UK - g	UK - h
	Deferred and retained remuneration in Gbp £	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1	MB Supervisory function	0	0	0	0	0	0	0	0
2	Cash-based	0	0	0	0	0	0	0	0
3	Shares or equivalent ownership interests	0	0	0	0	0	0	0	0
4	Share-linked instruments or equivalent non-cash instruments	0	0	0	0	0	0	0	0
5	Other instruments	0	0	0	0	0	0	0	0
6	Other forms	0	0	0	0	0	0	0	0
7	MB Management function & other senior management	0	0	0	0	0	0	0	0
8	Cash-based	1300155.74	574840.8	725314.93	0	0	0	574480.8	0
9	Shares or equivalent ownership interests	0	0	0	0	0	0	0	0
10	Share-linked instruments or equivalent non-cash instruments	0	0	0	0	0	0	0	0
11	Other instruments	0	0	0	0	0	0	0	0
12	Other forms	0	0	0	0	0	0	0	0
13	Other identified staff	0	0	0	0	0	0	0	0
14	Cash-based	120500	41000	79500	0	0	0	41,000	0
15	Shares or equivalent ownership interests				0	0	0		0
16	Share-linked instruments or equivalent non-cash instruments				0	0	0		0
17	Other instruments				0	0	0		0
18	Other forms				0	0	0		0
19	Total amount	1420655.74	615840.8	804814.93	0	0	0	615480.8	0

		a
	EUR	high earners as set out in Article 450(i) CRR
1	1 000 000 to below 1 500 000	2
2	1 500 000 to below 2 000 000	0
3	2 000 000 to below 2 500 000	0
4	2 500 000 to below 3 000 000	0
5	3 000 000 to below 3 500 000	0
6	3 500 000 to below 4 000 000	0
7	4 000 000 to below 4 500 000	0
8	4 500 000 to below 5 000 000	0
9	5 000 000 to below 6 000 000	0
10	6 000 000 to below 7 000 000	0
11	7 000 000 to below 8 000 000	0
x	To be extended as appropriate, if further payment bands are needed.	0

With reference to Article 450(1)(k) and 450(1) second para, GIB (UK) has assessed the criteria laid out by the regulators in terms of proportionality levels and what rules are applicable to GIB (UK) and what can be dis-applied. GIB (UK) has therefore, concluded that it can satisfy all of the requirements to be classified as a small CRR II firm and have outlined this in their Remuneration Policy.