

THE NAINITAL BANK LIMITED

Basel III Pillar 3 Disclosures (31.12.2021)

Table DF-2: Capital Adequacy

(i) Qualitative Disclosures

a. The Bank has put in place a robust Risk Management Architecture with due focus on Capital optimization and on profit maximization, i.e. to do maximum business out of the available capital which in turn maximize profit or return on equity. Bank is benchmarking on globally accepted sound risk management system, conforming to Basel III framework, enabling a more efficient equitable and prudent allocation of resources.

In Capital Planning process the bank reviews:

- Current capital requirement of the Bank
- The targeted and sustainable capital in terms of business strategy and risk appetite.

Capital needs are monitored periodically by the Internal Risk Management Committee comprising Top Executives. Capital requirement is projected annually considering the expected growth in advances, investments, Deposits, NPA, Operating Profit etc.

Bank maintains capital to cushion the risk of loss in value of exposure, businesses etc. so as to protect the depositors and general creditors against losses. Bank has a well defined Internal Capital Adequacy Assessment Policy (ICAAP) to comprehensively evaluate and document all risks.

In line with the guidelines of the Reserve Bank of India, the Bank has adopted Standardised Approach for Credit Risk, Basic Indicator Approach for Operational Risk and Standardized Duration Approach for Market Risk for computing CRAR.

The capital requirement is affected by the economic environment, the regulatory requirement and by the risk arising from bank's activities. The purpose of capital planning of the bank is to ensure the adequacy of capital at the times of changing economic conditions, even at times of economic recession. In capital planning process the bank reviews:

- Current capital requirement of the bank.
- The targeted and sustainable capital in terms of business strategy and risk appetite.
- The future capital planning is done on a three-year outlook.

(ii) Quantitative Disclosures

S. No.	Items	Amount (Rs. in Crores) 31.12.2021		
(b)	Capital requirements for Credit Risk			
	Portfolios subject to Standardized Approach	402.92		
	Securitization Exposures			
(c)	Capital requirements for Market Risk			
	Standardized Duration Approach	52.59		
	Interest Rate Risk	52.59		
	 Foreign Exchange Risk (including Gold) 			
	Equity Risk	0.00		
(d)	Capital requirements for Operational Risk			
	Basic Indicator Approach	55.09		
(e)	Common Equity Tier 1, tier 1 and Total Capital ratios:			
	Group CRAR			
	CET 1 Ratio			
	Tier 1 Ratio			
	Tier 2 Ratio			
	CRAR			
	Stand alone CRAR			
	CET 1 Ratio	12.70%		
	Tier 1 Ratio	12.70%		
	Tier 2 Ratio	0.87%		
	CRAR	13.57%		

Table DF-3: Credit Risk (i) Qualitative Disclosures

a. The policy of the bank for classifying bank's loan assets is as under:

NON PERFORMING ASSETS (NPA): A non performing asset (NPA) is a loan or an advance where;

- interest and/ or installment of principal remain overdue for a period of more than 90 days in respect of a term loan,
- the account remains 'out of order' in respect of an Overdraft/Cash Credit (OD/CC),
- the bill remains overdue for a period of more than 90 days in the case of bills purchased and discounted.
- the installment of principal or interest thereon remains overdue for two crop seasons for short duration crops,
- the installment of principal or interest thereon remains overdue for one crop season for long duration crops.

An OD/CC account is treated as 'out of order' if the outstanding balance remains continuously in excess of the sanctioned limit/drawing power. In cases where the outstanding balance in the principal operating account is less than the sanctioned limit/drawing power, but there are no credits continuously for 90 days as on the date of Balance Sheet or credits are not enough to cover the interest debited

during the same period, these accounts are treated as 'out of order'. An amount due to the bank under any credit facility is 'overdue' if it is not paid on the due date fixed by the bank.

Non Performing Assets of the Bank are further classified in to three categories as under:

Sub standard Assets

A sub standard asset would be one, which has remained NPA for a period less than or equal to 12 months. All the recovery measures are relevant in substandard assets also. If the entire overdues are recovered by way of cash recovery, the account can be upgraded to standard category immediately. Similarly, if an account is classified as NPA due to technical reasons, the account shall be upgraded on clearance of technical reasons.

Doubtful Assets

An asset would be classified as doubtful if it remained in the sub standard category for 12 months. Substandard and Doubtful accounts which are subjected to restructuring/rescheduling, can be upgraded to standard category only after a period of one year after the date when first payment of interest or of principal, whichever is earlier, falls due, subject to satisfactory performance during the period.

Loss Assets

A loss asset is one where loss has been identified by the bank or internal or external auditors or the RBI inspection. In Loss assets, realizable value of security available is not more than 10% of balance outstanding/ dues. Since security back up will not be available, the restructuring/ rehabilitation, if required, is considered with utmost care.

Strategies and Processes:

The bank has a well defined Loan Policy, Credit Risk Policy & Investment Policy covering the important areas of credit risk management as under:

- Exposure ceilings to different sectors of the economy, different types of borrowers and their group and industry
- Fair Practice Code in dispensation of credit.
- Discretionary Lending Powers for different levels of authority of the bank.
- Processes involved in dispensation of credit pre sanction inspection, rejection, appraisal, sanction, documentation, monitoring, and recovery.
- Fixation of pricing.

The Credit Risk philosophy, architecture and systems of the bank are as under:

Credit Risk Philosophy:

- To Optimise the Credit and return envisaged in order that the Economic Value Addition to Shareholders is maximized and the interests of all the Stakeholders are protected alongside ensuring corporate growth and prosperity with safety of bank's resources.
- To regulate and streamline the financial resources of the bank in an orderly

manner to enable the various channels to incline and achieve the common goal and objectives of the Bank.

- To comply with the national priorities in the matter of deployment of institutional finance to facilitate achieving planned growth in various productive sectors of the economy.
- To instill a sense of credit culture enterprise-wide and to assist the operating staff.
- To provide need-based and timely availability of credit to various borrower segments.
- To strengthen the credit management skills namely pre-sanction, postsanction monitoring, supervision and follow-up measures so as to promote a healthy credit culture and maintain quality credit portfolio in the bank.
- To deal with credit proposals more effectively with quality assessment, speed and in full compliance with extant guidelines.
- To comply with various regulatory requirements, more particularly on Exposure norms, Priority Sector norms, Income Recognition and Asset Classification guidelines, Capital Adequacy, Credit Risk Management guidelines etc. of RBI/other Authorities.

Architecture and Systems of the Bank:

- A Sub-Committee of Directors has been constituted by the Board to specifically oversee and co-ordinate Risk Management functions in the bank.
- Credit Policy Committee has been set up to formulate and implement various credit risk strategy including lending policies and to monitor Bank's Risk Management function on a regular basis.
- The CRMC (Credit Risk Management Committee) is responsible for measuring, controlling and managing the credit risk within the prescribed limits and to ensure compliance to functioning within the prudential limits set by the Board.
- Formulating of policies on standards for credit proposals, financial covenants, rating standards and benchmarks.
- Credit Department deal with identification, measurement, monitoring and controlling credit risk within the prescribed limits.
- Credit Risk Management department does the portfolio analysis on quarterly basis as per the defined methods under credit risk policy.
- Enforcement and compliance of the risk parameters and prudential limits set by the Board/regulator etc.,
- Laying down risk assessment systems, developing MIS, and monitoring quality of loan portfolio, identification of problems, correction of deficiencies.
- Improving credit delivery system upon full compliance of laid down norms and guidelines.

The Scope and Nature of Risk Reporting and/or Measurement System:

The Bank has in place a robust credit risk rating system for its credit exposures. An effective way to mitigate credit risks is to identify potential risks in a particular asset, maintain a healthy asset quality and at the same time impart flexibility in pricing assets to meet the required risk-return parameters as per the bank's overall strategy and credit policy. However Bank has a separate Credit Risk Policy where portfolio credit risk is analysed on quarterly interval on the basis defined methods.

(ii) Quantitative Disclosures

(b) Total Gross Credit Risk Exposure:

	Amount (Rs. in Crores)
Particulars	31.12.2021
Fund Based Outstanding	4062.43
Non-fund Based Outstanding	125.08
Total Gross Credit	4187.51

	Amount (Rs. in Crores)
Particulars	31.12.2021
Fund Based Exposure	4541.81
Non-fund Based Exposure	103.39
Total Gross Credit Exposure	4645.20

(c) Geographic Distribution of Exposures:

Exposures	Amount (Rs. in Crores)			
	Fund Based Non-fund Bas			
	Exposure Exposure			
Domestic operations	4541.81	103.39		
Overseas operations				
Total	4541.81	103.39		

(d) Industry Type Distribution of Exposures

(Rs. in Crores)

Industry Name	Fund based exposure	Non Fund exposure	Total Credit Exposure (Funded and Non-Funded)
A. Mining and Quarrying	55.89	0.00	55.89
A.1 Coal	0.00	0.00	0.00
A.2 Others	55.89	0.00	55.89
B. Food Processing	66.39	0.42	66.81
B.1 Sugar	0.00	0.00	0.00
B.2 Edible Oils and Vanaspati	27.75	0.00	27.75
В.З Теа	0.52	0.00	0.52
B.4 Coffee	0.00	0.00	0.00
B.5 Others	38.12	0.42	38.54

C. Beverages (excluding Tea & Coffee) and Tobacco	0.00	0.00	0.00
C.1 Tobacco and tobacco products	0.00	0.00	0.00
C.2 Others	0.00	0.00	0.00
D. Textiles	90.65	4.38	95.03
D.1 Cotton	3.95	0.35	4.30
D.2 Jute	0.00	0.00	0.00
D.3 Man-made	71.42	3.83	75.25
D.4 Others	15.28	0.20	15.48
Out of D (i.e., Total Textiles) to Spinning Mills			
E. Leather and Leather products	3.91	0.00	3.91
F. Wood and Wood Products	6.24	0.00	6.24
G. Paper and Paper Products	10.17	0.00	10.17
H. Petroleum (non-infra), Coal Products (non-mining) and Nuclear Fuels	0.60	0.00	0.60
I. Chemicals and Chemical Products (Dyes, Paints, etc.)	15.98	0.00	15.98
I.1 Fertilizers	0.86	0.00	0.86
I.2 Drugs and Pharmaceuticals	6.29	0.00	6.29
I.3 Petro-chemicals (excluding under Infrastructure)	0.00	0.00	0.00
I.4 Others	8.83	0.00	8.83
J. Rubber, Plastic and their Products	12.98	0.00	12.98
K. Glass & Glassware	4.81	0.00	4.81
L. Cement and Cement Products	3.19	0.00	3.19
M. Basic Metal and Metal Products	24.70	0.55	25.25
M.1 Iron and Steel	17.52	0.55	18.07
M.2 Other Metal and Metal Products	7.18	0.00	7.18
N. All Engineering	116.51	0.00	116.51
N.1 Electronics	0.29	0.00	0.29
N.2 Others	116.22	0.00	116.22
O. Vehicles, Vehicle Parts and Transport Equipment's	14.50	0.00	14.50
P. Gems and Jewellery	0.18	0.00	0.18
Q. Construction	16.73	3.25	19.98
R. Infrastructure	86.45	30.79	117.24
R.a Transport (a.1 to a.8)	20.36	0.00	20.36
R.a.1 Roads and Bridges	20.36	0.00	20.36
R.b. Energy (b.1 to b.6)	14.90	0.00	14.90
R.b.1 Electricity Generation	14.90	0.00	14.90
R.b.1.1 Central Govt PSUs	0.00	0.00	0.00
R.b.1.2 State Govt PSUs (incl. SEBs)	14.90	0.00	14.90
R.b.1.3 Private Sector	0.00	0.00	0.00
R.e. Social and Commercial Infrastructure (e.1 to e.12)	29.50	1.09	30.59
R.e.4 Common infrastructure for industrial parks, SEZ, tourism facilities and agriculture markets	29.50	1.09	30.59
R.f. Others, if any, please specify	21.69	29.70	51.39

S. Other Industries, pl. specify	14.07	0.00	14.07
All Industries (A to S)	543.95	39.39	583.34
Residuary other advances (to tally with gross advances)	3997.86	64.00	4061.86
Total	4541.81	103.39	4645.20

		(Rs	s. in Crore)
Industry Name	Fund based outstanding	Non Fund outstanding	Total Outstanding
A. Mining and Quarrying	45.03	0.30	45.33
A.1 Coal	0.00	0.00	0.00
A.2 Others	45.03	0.30	45.33
B. Food Processing	61.35	0.49	61.84
B.1 Sugar	0.00	0.05	0.05
B.2 Edible Oils and Vanaspati	26.59	0.00	26.59
B.3 Tea	0.52	0.00	0.52
B.4 Coffee	0.00	0.00	0.00
B.5 Others	34.25	0.44	34.69
C. Beverages (excluding Tea & Coffee) and Tobacco	0.00	0.00	0.00
C.1 Tobacco and tobacco products	0.00	0.00	0.00
C.2 Others	0.00	0.00	0.00
D. Textiles	89.00	2.10	91.10
D.1 Cotton	3.32	0.35	3.67
D.2 Jute	0.00	0.00	0.00
D.3 Man-made	71.26	1.48	72.74
D.4 Others	14.43	0.27	14.70
Out of D (i.e., Total Textiles) to Spinning Mills			
E. Leather and Leather products	2.98	0.14	3.12
F. Wood and Wood Products	5.69	0.00	5.69
G. Paper and Paper Products	8.28	0.06	8.34
H. Petroleum (non-infra), Coal Products (non-mining) and Nuclear Fuels	0.40	0.00	0.40
I. Chemicals and Chemical Products (Dyes, Paints, etc.)	11.75	0.07	11.82
I.1 Fertilizers	0.83	0.00	0.83
I.2 Drugs and Pharmaceuticals	4.80	0.00	4.80
I.3 Petro-chemicals (excluding under Infrastructure)	0.00	0.00	0.00
I.4 Others	6.13	0.07	6.20
J. Rubber, Plastic and their Products	10.90	0.00	10.90
K. Glass & Glassware	4.75	0.00	4.75
L. Cement and Cement Products	2.93	0.00	2.93
M. Basic Metal and Metal Products	21.53	0.43	21.96

M.1 Iron and Steel	14.97	0.43	15.40
M.2 Other Metal and Metal Products	6.56	0.00	6.56
N. All Engineering	114.10	0.79	114.89
N.1 Electronics	0.17	0.00	0.17
N.2 Others	113.93	0.79	114.72
O. Vehicles, Vehicle Parts and Transport Equipments	11.80	0.00	11.80
P. Gems and Jewellery	0.18	0.00	0.18
Q. Construction	12.89	8.80	21.69
R. Infrastructure	61.31	8.31	69.62
R.a Transport (a.1 to a.8)	19.82	0.75	20.57
R.a.1 Roads and Bridges	19.82	0.75	20.57
R.b. Energy (b.1 to b.6)	14.76	0.00	14.76
R.b.1 Electricity Generation	14.76	0.00	14.76
R.b.1.1 Central Govt PSUs	0.00	0.00	0.00
R.b.1.2 State Govt PSUs (incl. SEBs)	14.76	0.00	14.76
R.b.1.3 Private Sector	0.00	0.00	0.00
R.e. Social and Commercial Infrastructure (e.1 to e.12)	26.47	2.58	29.05
R.e.4 Common infrastructure for industrial parks, SEZ, tourism facilities and agriculture markets	26.47	2.58	29.05
R.f. Others, if any, please specify	0.26	4.99	5.25
S. Other Industries, pl. specify	40.42	0.00	40.42
All Industries (A to S)	505.31	21.49	526.80
Residuary other advances (to tally with gross advances)	3557.12	103.59	3660.71
Total	4062.43	125.08	4187.51

(Rs. in Crores)

Credit Exposure of industries where outstanding exposure is more than 5% of the Total Gross Credit Exposure of the Bank is as follows:

S.No.	Industry	Total Exposure/ (O/s bal.) (in Crores)	% of Total Gross Credit Exposure
	NIL		

(e) Residual maturity breakdown of assets

					(Rs. in Crores)		
	Cash & Balances with RBI	Balances with other Banks & Money at call & short notice	Investm ents	Advances	Fixed Assets	Other Assets	Total
1Day	83.55	231.56	0.00	75.22	0.00	209.94	600.27
2-7Days	9.14	26.87	0.00	99.85	0.00	1.28	137.14
8-14Days	8.62	23.00	24.72	118.54	0.00	1.55	176.43
15-30Days	7.54	35.95	0.00	213.21	0.00	2.61	259.31
31days – upto2Months	10.63	53.97	73.58	119.18	0.00	1.45	258.81
Over 2months upto 3Months	17.52	131.94	20.58	116.65	0.00	1.45	288.14
Over 3 upto 6 Months	33.02	210.28	132.42	56.09	0.00	3.10	434.91
Over 6 upto 12 Months	69.38	634.02	116.06	119.13	0.00	3.29	941.88
Over 1 year upto 3 Years	56.38	26.29	262.32	1719.84	0.00	2.51	2067.34
Over 3 upto 5 Years	3.66	0.00	661.78	421.00	0.00	12.16	1098.60
Over 5 Years	0.82	0.00	998.94	710.35	55.09	13.80	1779.00
TOTAL	300.26	1373.88	2290.40	3769.06	55.09	253.14	8041.83

S.No.	Asset Category	Amount (Rs. in Crores)
a)	NPAs (Gross)*:	545.96
	Substandard	172.30
	Doubtful 1	20.06
	Doubtful 2	234.76
	Doubtful 3	46.36
	Loss	72.48
b)	Net NPAs	189.74
c)	NPA Ratios	
- 1	Gross NPAs to gross advances (%)	13.44%
	Net NPAs to net advances (%)	5.12%
d)	Movement of NPA(Gross)	
	Opening balance	650.67
	Additions	130.66
	Reductions	235.37
	Any other adjustments due to Exchange	200107
	Diff	
	Closing balance	545.96
e)	SPECIFIC PROVISION	5-5.50
e)	Movement of provisions for NPAs	
	Opening balance	358.60
	Provisions made during the period	10.40
		89.31
	Write offs/ Write back of excess provisions	89.31
	Any other adjustments, including transfers between provisions	
	Closing balance	279.69
	GENERAL PROVISION (Floating Provision)	
f)	Movement of provisions for NPAs	
•)	Opening balance	62.84
	Provisions made during the period	0.00
	Write offs	0.00
	Write back of excess provisions	0.00
		0.00
	Any other adjustments, including	0.00
	transfers between provisions	62.84
\//wite	Closing balance	62.84
	offs that have been booked directly to the	0.00
	e statement eries that have been booked directly to the	0.00
	e statement	0.00
g)	Amount of Non-Performing Investments	0.00
h)	Amount of provisions held for non- performing investment	0.00
i)	Movement of provisions for	3.08
	depreciation on investments	
	Opening balance	0.00
	Provisions made during the period	0.00
	Write-off	0.00
	Write back of excess provisions	1.74
	Closing balance	1.34

j)	By major industry or counter type		
		Amount of NPAs	Provision
	Top 5 Industries	184.39	110.47
k)	Geographic-wise breakup	Gross NPA	Provision
	Domestic	545.96	279.69

Table DF-4: Credit Risk Disclosures for portfolios subject to StandardisedApproach

(i) Qualitative Disclosures

(a) For portfolios under the Standardised Approach:

The Bank has recognized following credit rating agencies for the purpose of rating of an exposure & assigning risk weights for computation of capital charge under standardized approach.

Domestic credit rating agencies:

- Credit Analysis & Research Limited (CARE),
- CRISIL Limited,
- ICRA Limited,
- India Ratings (Formerly FITCH India)
- Brickwork
- SMERA
- Infomerics Ratings

Types of exposure for which each agency is used:

All the above agencies are recognized for rating all types of exposures.

A description of the process used to transfer public issue ratings onto comparable assets in the banking books:

- Bank has used short term ratings for assets with maturity up to one year and long term ratings for assets maturing after one year as accorded by the approved external credit rating agencies.
- Bank has not used one rating of a CRA (Credit Rating Agency) for one exposure and another CRA's rating for another exposure on the same counterparty unless only one rating is available for given exposure.
- As per Board approved LPD Policy loans having aggregate sanctioned limit of Rs.30.00 Crore and above are required for external rating. However, an undertaking from the borrowers having sanctioned aggregate credit facilities of Rs.10.00 Crores and above and up to Rs.30.00 Crores to be obtained for obtaining/submitting of such ratings as & when the same is required as per regulator's guidelines.
- Bank has used only solicited rating from the recognized CRAs.

(ii) Quantitative Disclosures

(b) Amount of the Bank's Exposures- Gross Advances (Rated & Unrated) in Major Risk Buckets -under Standardized Approach, after factoring Risk Mitigants (i.e. Collaterals):

The amount of exposure including non-fund based after risk mitigation subject to Standardized Approach (rated and unrated) in the following three major risk buckets are as under:

S.No.	Particulars	Outstanding Amount(Rs. in Crores)	
		Fund Based	Non –Fund Based
		31.12.2021	31.12.2021
1	Below 100 % risk weight	2323.43	0.00
2	100 % risk weight	917.31	86.67
3	More than 100 % risk weight	278.81	0.00
4	CRM Deducted	542.88	38.41
5	Total Outstanding		
	Position	4062.43	125.08
S.No.	Particulars	Exposure Amount(Rs. in Crores)	
		Fund Based	Non – Fund Based
		31.12.2021	31.12.2021
1	Below 100 % risk weight	2976.66	0.00
2	100 % risk weight	754.18	64.98
3	More than 100 % risk		0.00
	weight	268.09	
4	CRM Deducted	542.88	38.41
5	Total Exposure	4541.81	103.39

Leverage Ratio

The Basel III leverage ratio is defined as the capital measure (Tier-1 capital of the risk based capital framework) divided by the exposure measure, with this ratio expressed as a percentage. The Bank is required to maintain a minimum leverage ratio of 3.50%. As per RBI guidelines, disclosures required for leverage ratio for the Bank as of December 30th, 2021 is as follows:

DF-17: Summary Comparison of Accounting Assets vs. Leverage Ratio Exposure Measure

S.No.	Item	(Rs. in Million)
1	Total consolidated assets as per published financial statements	81168.95
2	Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	
3	Adjustment for fiduciary assets recognised on the balance sheet pursuant to the operative accounting	

	framework but excluded from the leverage ratio	
	exposure measure	
4	Adjustments for derivative financial instruments	
5	Adjustment for securities financing transactions (i.e.	
	repos and similar secured lending)	
6	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off- balance sheet exposures)	7234.57
7	Other adjustments	-4373.37
8	Leverage ratio exposure	84030.15

Table DF-18: Leverage Ratio Common Disclosure Template

S. No.	Item	Leverage ratio framework (Rs. in Million)
	On-balance sheet exposures	
1	On-balance sheet items (excluding derivatives and SFTs, but including collateral)	81168.95
2	(Asset amounts deducted in determining Basel III Tier 1 capital)	
3	Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of lines 1 and 2)	81168.95
	Derivative exposures	
4	Replacement cost associated with all derivatives transactions (i.e. net of eligible cash variation margin)	
5	Add-on amounts for PFE associated with all derivatives transactions	
6	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the operative accounting framework	
7	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	
8	(Exempted CCP leg of client-cleared trade exposures)	
9	Adjusted effective notional amount of written credit derivatives	
10	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	
11	Total derivative exposures (sum of lines 4 to 10)	
	Securities financing transaction exposures	
12	Gross SFT assets (with no recognition of netting), after adjusting for sale accounting transactions	
13	(Netted amounts of cash payables and cash receivables of gross SFT assets)	
14	CCR exposure for SFT assets	
15	Agent transaction exposures	
16	Total securities financing transaction exposures (sum of lines 12 to 15)	
	Other off-balance sheet exposure	
17	Off-balance sheet exposure at gross notional amount	7234.57
18	(Adjustments for conversion to credit equivalent amounts)	-4373.37
19	Off-balance sheet items (sum of lines 17 and 18)	2861.20

	Capital and total exposures	
20	Tier 1 capital	5639.64
21	Total exposures (sum of lines 3, 11, 16 and 19)	84030.15
	Leverage ratio	
22	Basel III leverage ratio	6.71%