Access Bank Plc

Pillar 3 -Disclosures 2016

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Access Bank Disclosure Glossary

ACRONYMS	MEANING
AGM	Annual General Meeting
ALCO	Asset and Liability Committee
ALM	Asset and Liability Management
AMCON	Asset Management Corporation of Nigeria
AML	Anti-Money Laundering
Basel II	Banking laws and regulations issued by the Basel Committee on Banking Supervision
BCBS	Basel Committee of Banking Supervision
CAC	Critical Asset Committee
CAR	Capital Adequacy Requirement
CBN	Central Bank of Nigeria
CFO	Chief Financial Officer
CPB	Capital Planning Buffer
CRM	Credit Risk Management
CRO	Chief Risk Officer
CRR	Cash Reserve Ratio
DNB	De Nederlandsche Bank
EBA	European Banking Authority
EIU	Economic Intelligence Unit
ERMC	Enterprise Risk Management Committee
EXCO	Executive Committee
FCY	Foreign Currency
FGN	Federal Government of Nigeria

ACRONYMS	MEANING
FPI	Foreign Portfolio Investment
FIRB	Foundation Internal Ratings Based Approach (Basel II Credit Risk Measurement Approach)
GCR	Global Credit Rating
HNI	High Net-worth Individual
ICA	Internal Capital Adequacy
ICAAP	Internal Capital Adequacy Assessment Process - the process followed to arrive at a Bank's self- assessment of capital requirements
IRR	Interest Rate Risk
KYC	"Know your Customer" (AML Requirements)
KYCB	"Know your Customer's Business" (AML Requirements)
LR	Leverage Ratio
MRIA	Material Risk Identification and Assessment
MRM	Market Risk Management
NFIU	Nigerian Financial Intelligence Unit
NII	Net Interest Income
NSE	Nigerian Stock Exchange
NSFR	Net Stable Funding Ratio
OECD	Organisation of Economic Co-operation and Development
ORMU	Operational Risk Management Unit
Pillar 1	Minimum capital requirements, addressing risk.
Pillar 2	Supervisory review process under the Basel Accord
POS	Point of Sale
RAROC	Risk Adjusted Return on Capital

ACRONYMS	MEANING
RCSA	Risk Control Self-Assessment
S&P	Standards &Poor's
SBU	Strategic Business Unit
SFT	Securities financing transactions
SME	Small and Medium Enterprises
SPE	Special Purpose Entity
TRS	Total Return Swap
VaR	Value at Risk

1. Executive Summary.

1.1. Background

The Central Bank of Nigeria (CBN), in 2013, issued a circular to all Banks and Discount Houses on the implementation of Basel II/III in Nigeria. In line with the Basel II (Pillar III – Market Discipline Disclosures), banks in Nigeria have been mandated to disclose information relating to their core activities, risk profiles and methodologies used in assessing risk exposures.

In June 2015, the CBN released a revised guideline on Pillar III Disclosures, with reference number, BSD/DIR/GEN/BAS/08/031/6. The guideline sets out among other things the general requirements and scope of application of Pillar III Disclosures.

1.2. Purpose/Aim

The aim of the Pillar III Disclosures is to promote market discipline by allowing market participants to access information on risk exposure and risk management policies. This document comprises Access Bank's ("Access Bank, "the Bank", "we") Pillar 3 disclosures on Capital, Risk Exposure and Management at 31 December, 2016. The general purpose of this document is as follows:

- To meet the regulatory requirement as set out by the CBN on Revised Guidance Notes on Pillar III – Market Discipline.
- To provide further useful information on the capital and risk profile of Access Bank Plc.

1.3. Company Overview

Access Bank Plc. was incorporated as a private limited liability company on 8 February 1989 and commenced business on 11 May 1989. Access Bank was converted to a public limited liability company on 24 March 1998 and its shares were listed on the Nigerian Stock Exchange (NSE) on 18 November 1998. The Bank was issued a universal banking license by the CBN on 5 February 2001. Access Bank's principal activities include the provision of money market products and services, retail banking, granting loans and advances, equipment leasing, corporate finance and foreign exchange operations.

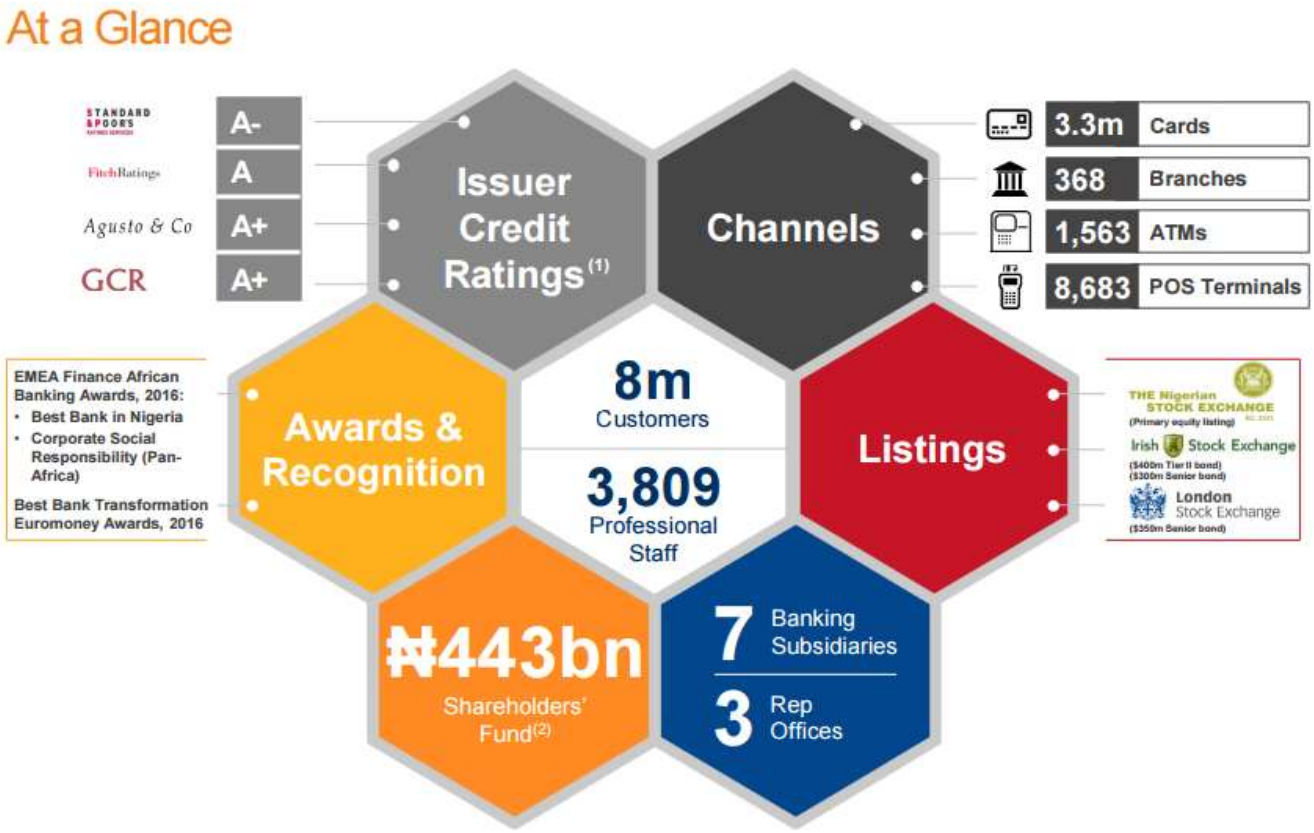
The Bank has subsequently grown to become one of the top three largest banks in Nigeria with total assets of N 3.4 trillion (FY 2016) and a network of over 350 branches across major cities in Nigeria and operations in Sub Saharan Africa, the UK with representative offices in China, Lebanon and the UAE.

We have established a unique banking brand recognized for distinctive strengths that include:

- Experienced and stable management team;
- Strong corporate governance philosophy and practices - rigorous governance culture that guides and facilitates effective coordination and control of its business operations;
- Strong execution engine with a proven track record;
- Value chain model approach;
- National branch footprint in key commercial locations;

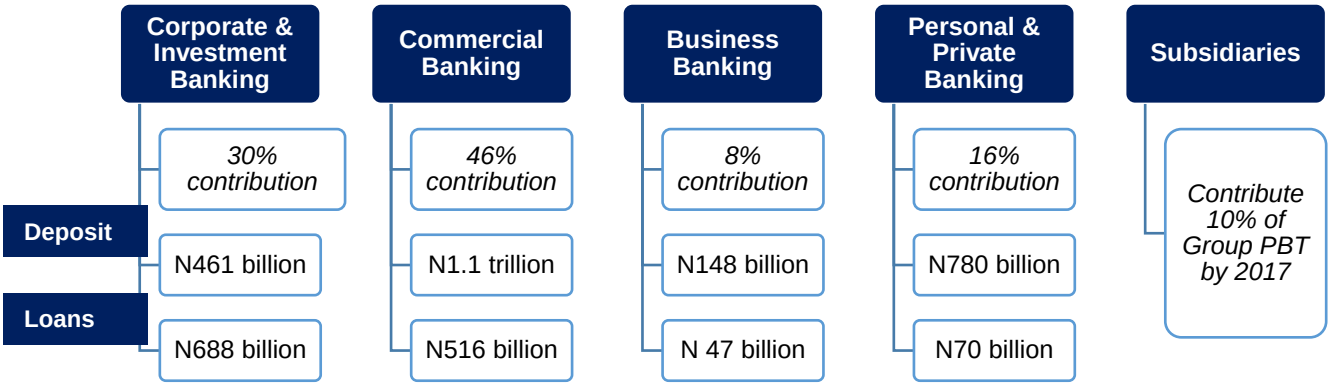
- Strong market share in large corporate customers' wallet across different industries/sectors; and
- Robust ERM framework.

Our overall strategic intent for the near future is to be the world's most respected African bank. The Bank aspires to rank in the top three positions in its chosen markets by 2017, with a deliberate focus on Nigeria as its primary market; but will extend its operations to high impact African economies and leverage the UK as a trade transaction hub. Target contribution by foreign subsidiaries is 10% of overall profits of the Banking Group by 2017. Part of the Bank's strategic thrust is a deliberate focus on improving profitability and returns to shareholders.



1.4. Access Bank Plc. Corporate Goals by 2017

Figure 1: Access Bank's 2017 Corporate Goals



To achieve our desired growth, the Bank implements a distinctive operating model. The model focuses on delivery of distinctive customer experience, balanced with efficient service delivery operations. The Bank will improve capabilities across business enablers/support functions - operations, risk management, human resource and information technology – through specific strategic programs.

1.5. Legal Structure and Entities

Access Bank has subsidiaries across Sub Saharan Africa and Europe, providing financial and banking services. The Bank's subsidiaries include: Access Bank (Gambia) Limited, Access Bank (Sierra Leone) Limited, Access Bank (Zambia) Limited, Access Bank (UK) Limited, Access Bank (Ghana) Limited, Access Bank (D.R. Congo), and Access Bank (Rwanda) Limited. The Bank also has representative offices in China, Lebanon and UAE.

Within the group, we also have Access Finance B.V., an offshore Special Purpose Vehicle (SPV) used for the issuance of a US$350,000,000, 7.25 percent Guaranteed Notes due 2017 and guaranteed by the Bank. Access Finance B.V. was incorporated in 2011 and commenced operations in 2012.

Access Bank's subsidiaries have share capital consisting solely of ordinary shares, which are held directly by the Group and the proportion of ownership interests held equals to the voting rights held by the Group. The subsidiaries' countries of incorporation are also the principal places of business.

Other Access Bank legal entities include Restricted Share Performance Plan (RSPP) and Flexmore Technologies Limited. Both Access Bank RSPP and Flexmore Technologies Limited were incorporated in Nigeria.

Access Bank RSPP is a share rewards scheme designed solely for Access Bank staff irrespective of where they work within the Group. The shares are awarded to employees based on their performance, at no cost to them. The shares vest over a three year period from the date of the award.

On 13 April 2016, the Corporate Affairs Commission (CAC) gave approval for the liquidation of Flexmore Technologies Limited with a three month notice period starting 1 April 2016. The entity is considered liquidated as the notice period has elapsed.

The table below provides a summary on sizes and staff strength of the Bank's various entities as at September 2016:

Table 1: Access Bank's Plc. Subsidiaries at 31 December 2016

Entity	Country of Incorporation	Company Number	Ownership Interest	Number of Branches
Access Bank UK	United Kingdom	06365062	100%	2
Access Bank Ghana	Ghana	CA-47,865	91%	39
Access Bank Rwanda Limited	Rwanda	100053886	75%	7
Access Bank R.D. Congo	Congo	CD/KIN/RCCM/14-B-01529	74%	2
Access Bank Zambia	Zambia	69264	92%	6
Access Bank Gambia Limited	Gambia	452/2007	64%	6
Access Bank Sierra Leone Limited	Sierra Leone	452	97%	4

Access Bank's subsidiaries consist of companies across the globe which contribute to Access Bank Group's profit. All subsidiaries operate in the financial services industry.

1.6. Scope of Application

Access Bank Plc consolidated and separate financial statements have been prepared in accordance with International Financial Reporting Standards (IFRSs) issued by the International Accounting Standards Board (IASB). Additional information required by national regulations is included where appropriate.

Subsidiaries are all entities (including structured entities) over which the group exercise control. Control is achieved when the Group can demonstrate it has: i. Power over the investee; ii. Exposure, or rights, to

variable returns from its involvement with the investee; and iii. The ability to use its power over the investee to affect the amount of the investor's returns.

Business combinations are accounted for using the acquisition method as at the acquisition date, which is the date on which control is transferred to the Group. Control is the power to govern the financial and operating policies of an entity so as to obtain benefits from its activities. In assessing control, the Group takes into consideration potential voting rights.

However, for the purpose of this disclosure the information on this document are reported at the individual, parent entity level and not at a consolidated level. As a result, investments in the subsidiaries discussed above are deducted from regulatory capital for capital adequacy purposes as per the CBN guideline.

Access Bank Plc Key Metrics

	Capital Adequacy Ratio	Tier 1 Ratio	Total Eligible Capital	Total Risk Weighted Assets	Credit Risk Weighted Assets
2016	19.11%	15.01%	416.87	2,181.48	1,746.41
2015	17.07%	13.60%	339.91	1,991.61	1,680.02
			N'Billion	N'Billion	N'Billion

METRIC	REPORT YEAR 2016 (N'Bn)	PREVIOUS YEAR 2015 (N'Bn)	% CHANGE
Capital Adequacy Ratio	19.11%	17.07%	12%
Tier 1 Ratio	15.01%	13.60%	10%
Eligible Tier 1	327.46	270.90	21%
Eligible Tier 2	89.41	69.01	30%
Total Eligible Capital	416.87	339.91	23%
Credit Risk Weighted Assets	1,746.41	1,680.02	4%
Market Risk Weighted Assets	85.09	28.67	197%
Operational Risk Weighted Assets	349.98	282.92	24%
Total Risk Weighted Assets	2,181.48	1,991.61	10%

Access Bank Plc 2016 ICAAP REPORT

	Pillar I Capital Requirement	Pillar II Capital Requirement	Credit Risk Capital Requirement	Operational Risk Capital Requirement	Market Risk Capital Requirement
2016	296.77	21.93	261.96	28.00	6.81
2015	276.97	14.56	252.00	22.68	2.29
	N'Billion	N'Billion	N'Billion	N'Billion	N'Billion

METRIC	REPORT YEAR 2016 (N'Bn)	PREVIOUS YEAR 2015 (N'Bn)	% CHANGE
Credit Risk	261.96	252.00	4%
Market Risk	6.81	2.29	197%
Operational Risk	28.00	22.68	23%
Sector Concentration Risk	1.13	0.94	20%
Geography Concentration Risk	2.14	-	
Business/Strategic Risks	1.75	1.38	27%
Reputational Risk	0.57	0.52	10%
Group/Country Risk	9.03	5.24	72%
Interest Rate Risk in the Banking Book	1.83	0.19	860%
Liquidity Risk	1.45	2.25	-35.7%
Model Risk	4.05	4.04	0.2%

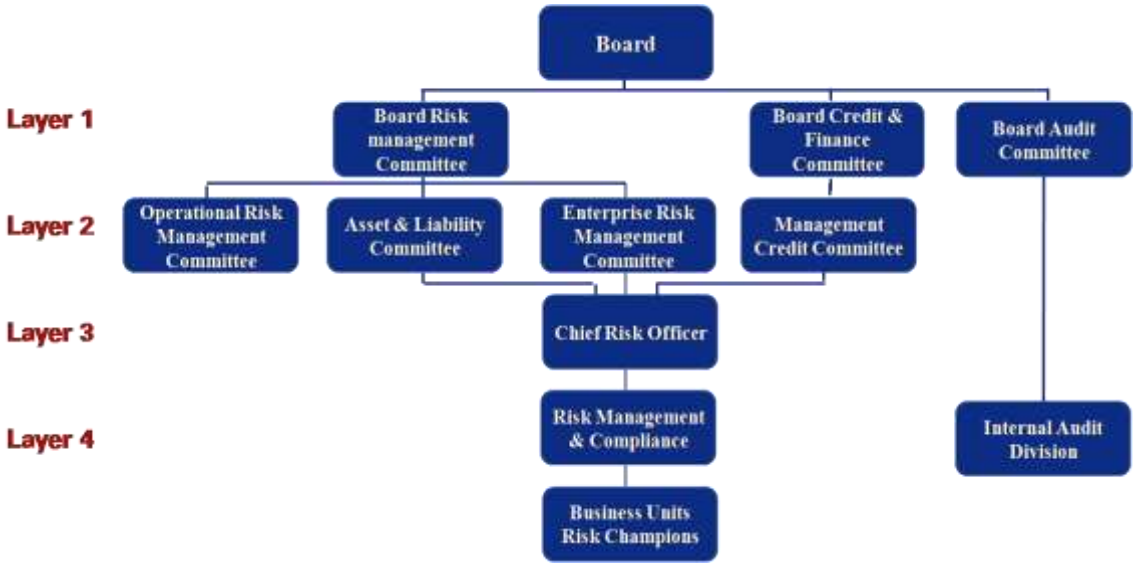
2. Risk Management Governance and Strategy.

2.1. Risks Governance.

The Bank has a well-structured risk management framework and governance structure in identifying, assessing, monitoring, controlling and reporting the inherent risks its business activities. The Bank's organisational structure and business strategy is well aligned with its risk management philosophy.

The Bank views and treats risks as an intrinsic part of business and maintains a disciplined approach to risk management. The Group's risk functions are quite dynamic and responsive to the needs of stakeholders while improving the focus on the inter-relationships between risk types. The Bank uses periodic review of risk exposure limits and risk control to position itself against adverse scenarios. Risk management functions are defined along three categories – lines of business, governance and control and corporate audit. The Bank believes it has processes in place to identify and mitigate exposure to high levels of risk which may cause distress to the business.

Access Bank's Risk Management Governance Structure is depicted below.



2.2. Risk Appetite

Risk appetite is an articulation and allocation of the risk capacity or quantum of risk Access Bank is willing to accept in pursuit of its strategy, duly set and approved by the executive committee and the Board, and integrated into our strategy, business, risk and capital plans. Risk appetite reflects the Bank's capacity to sustain potential losses arising from a range of potential outcomes under different stress scenarios. The Bank defines its risk appetite in terms of both volatility of earnings and the maintenance of minimum regulatory capital requirements under stress scenarios. Our risk appetite can be expressed in terms of how much variability of return the Bank is prepared to accept in order to achieve a desired level of result. It is determined by considering the relationship between risk and return. We measure and express risk appetite qualitatively and in terms of quantitative risk metrics. The quantitative metrics include earnings at risk (or earnings volatility), Liquidity and economic capital adequacy. In addition, a

large variety of risk limits, triggers, ratios, mandates, targets and guidelines are in place for all the financial risks (e.g. credit, market and asset and liability management risks). The Bank's risk profile is assessed through a 'bottom-up' analytical approach covering all of the Bank's major businesses and products. The risk appetite is approved by the Board and forms the basis for establishing the risk parameters within which the businesses must operate, including policies, concentration limits and business mix.

In 2016, the risk appetite metrics were tracked against approved triggers and exceptions were reported to management for prompt corrective actions. Key issues were also escalated to the Enterprise Risk Management committee (ERMC) and the Board Risk Management Committee (BRMC).

2.3. Access Bank Risk Strategy.

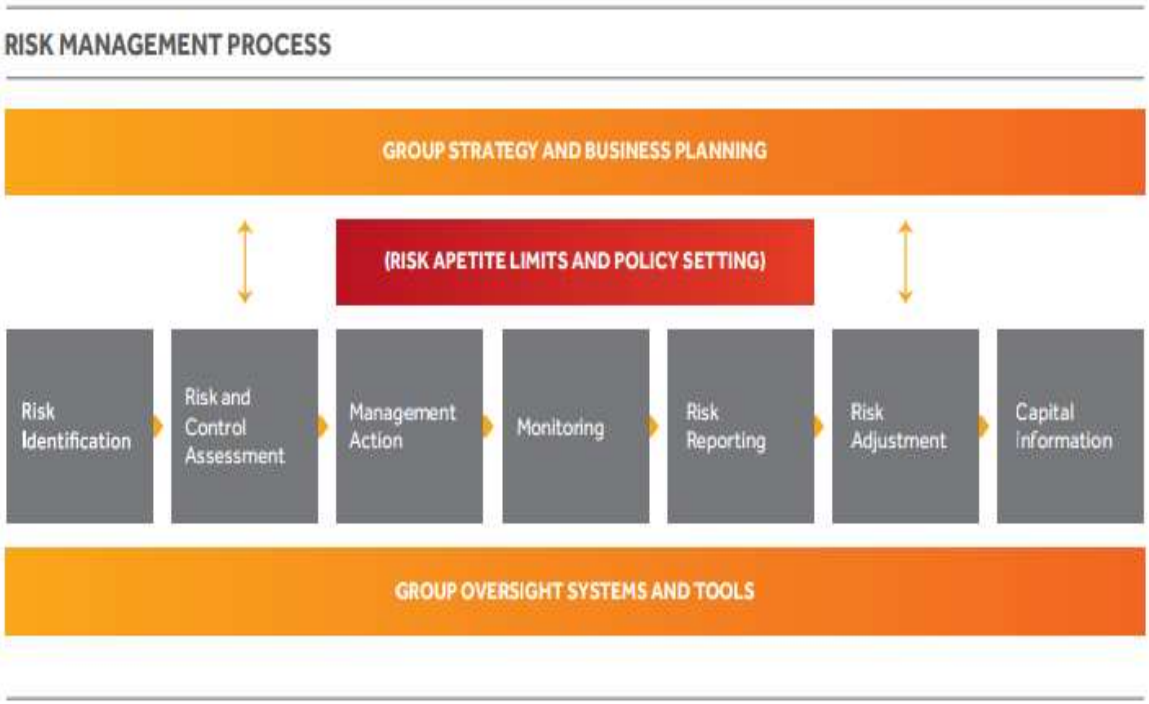
Access Bank's Risk Culture Statement:

"***At Access Bank, we embrace a moderate risk appetite, whilst delivering strategic objectives. We anticipate the risks in our activities. We reward behaviour that aligns with our core values, controls and regulations. Challenges are discussed in an open environment of partnership and shared responsibility***".

Access Bank's Risk management philosophy and culture remain fundamental to the delivery of our strategic objectives. Risk management is at the core of the operating structure of the bank. We seek to limit adverse variations in earnings and capital by managing risk exposures within our moderate risk appetite. Our risk management approach includes minimizing undue concentrations of exposure, limiting potential losses from stress events and the prudent management of liquidity. The Bank's acclaimed risk management process has continued to achieve desired results as evidenced by improved risk ratios and independent risk ratings. In line with the Bank's core value of excellence, the Bank's risk management is continuously evolving and improving, given that there can be no assurance that all market developments, in particular those of extreme nature, can be fully anticipated at all times. Hence, executive management has remained closely involved with important risk management initiatives, which have focused particularly on preserving appropriate levels of liquidity and capital, as well as managing the risk portfolios.

Risk management is fundamental to the Bank's decision-making and management process. It is embedded in the role of all employees via the organizational culture, thus enhancing the quality of strategic, capital allocation and day-to-day business decisions. Access Bank considers risk management philosophy and culture as the set of shared beliefs, values, attitudes and practices that characterize how the Bank considers risk in everything it does, from strategy development and implementation to its day-to-day activities.

In this regard, the Bank's risk management philosophy is that a moderate and guarded risk attitude ensures sustainable growth in shareholder value and reputation.



2.4. Enterprise Risk Management.

The Bank believes that ERM provides the superior capabilities to identify and assess the full spectrum of risks and to enable staff at all levels to better understand and manage risks. This will ensure that:

- Risk acceptance is done in a responsible manner;
- The executive and the Board of the Bank have adequate risk management support;
- Uncertain outcomes are better anticipated;
- Accountability is strengthened; and
- Stewardship is enhanced.

The Bank's overall risk tolerance is established in the context of our earning power, capital and diversified business model. The Bank's organisational structure and business strategy is aligned with its risk management philosophy. As the Bank navigates through new frontiers in a growth market in the ever-changing risk universe, proactive ERM Framework becomes even more critical in a bid to push the frontiers of our overall risk profile whilst remaining responsive to the ever-changing risk universe.

Access Bank views and treats risks as an intrinsic part of business and maintains a disciplined approach to its management of risk. Its Risk functions remain dynamic and responsive to the needs of stakeholders as it improves its focus on the inter-relationships between risk types. It uses periodic reviews of risk exposure limits and risk control to position itself against adverse scenarios. This is an invaluable tool with which the Bank predicted and successfully managed the headwinds – local and global – which impacted the macro economy in 2016. The Bank's risk management architecture, as

designed, continued to balance corporate oversight with well-defined risk management functions which fall into one of three categories where risk must be managed: lines of business, governance and control, and corporate audit. The Board of Directors and management of the Bank are committed to constantly establishing, implementing and sustaining tested practices in risk management to match those of leading international banks. We are convinced that the long-term sustainability of the Bank depends critically on the proper governance and effective management of our business.

As such, risk management occupies a significant position of relevance and importance in the Bank. Risk strategies and policies are set by the Board of Directors of Access Bank. These policies, which define acceptable levels of risk for day-to-day operations as well as the willingness of Access Bank to assume risk, weighed against the expected rewards are detailed in the (ERM) Framework, which is a structured approach to identifying opportunities, assessing the risk inherent in these opportunities and actively managing these risks in a cost-effective manner. Specific policies are also in place for managing risks in the different core risk areas of credit, market and operational risks as well as for other key risks such as liquidity, strategic and reputational risks.

The role of the Group Chief Risk Officer in Access Bank remains pivotal as he has the primary responsibility for the overall risk management and effective ERM Framework of both the Bank and its subsidiaries. He provides robust challenge to the management teams based on quantitative and qualitative metrics. Though amendments to the Bank's ERM Framework require Board approval, the risk management division is responsible for the enforcement of the Bank's risk policy by constantly monitoring risk, with the aim of identifying and quantifying significant risk exposures and acting upon such exposures as necessary. Risk Management in Access Bank Plc has become a culture and everyone, from the most junior officer to the Executive Management has cultivated the risk culture. The Bank officers approach every banking transaction with care, taking into consideration the Bank's acceptable risk appetite.

2.4.1. Risk Analytics and Reporting

The Bank's Risk Analytics and Reporting Group continues to champion the development and entrenchment of integrated data architecture to enhance risk analytics and reporting within the ERM space in Access Bank. The Group has aligned its governance and risk functions to that of leading global financial institutions and also considered all contents as seen in most jurisdictions where risk management is best practised.

The Group gives Risk management space a critical depth and dimension in its risk management activities as it relates to data management and integration. The Group is responsible for enhancing all core risk analytical and reporting functions that previously resided in the respective risk areas within our Enterprise Risk Management (ERM), while the Bank's pre-defined governance structures in respect of the above-mentioned functions is retained by the respective risk groups.

The Group remains the key driver in ensuring that Access Bank fully implements Basel II/III to the most advanced levels in alignment with the CBN prudential guidelines. The team is also responsible for the

Internal Capital Adequacy Assessment Process (ICAAP), stress testing, Liquidity Risk measurement and other risk measurement activities. The Group aligns its reporting with the Bank's predefined government structure such as BRMC, BCC and ERMC.

The functional set up of the Risk Analytics and Reporting group is as follows:

- Data management and integration
- Integrated Risk Analytics
- Integrated Risk Reporting

2.4.1.1 Data Management and Integration.

This unit is responsible for the development and maintenance of the enterprise risk data architecture with a roadmap geared to promoting data integrity, data quality and ensuring integration with risk analytics and reporting.

The Group has a data governance structure which enforces risk data governance and discipline across the Bank as well as data quality measurement metrics to reduce the Bank's risk exposure due to data quality issues.

An efficient structure has been put in place to ensure auto-reconciliation of data across risk and finance silos to improve timeliness and consistency of risk reporting. The Group is in the process of developing a data structure model which will support the risk analytics and reporting activities, thus driving improvements.

2.4.1.2 Integrated Risk Analytics

The Group guides the analytical input into the implementation of various risk software and their on-going implementation in Credit risk, Market risk, Operational risk and other risk areas. The unit also drives the development as well as implementation of the internal and regulatory risk measurement methodology and models for the core risk elements; examples of the model are Rating models, Scoring models, Probability of Default (PD), Loss Given Default (LGD) and Exposure At Default (EAD) ,etc.

The unit designs stress test models and implements the same on the Bank's portfolios and risk profile as well as comprehensive risk analyses to provide insight into all current Strategic Business Unit (SBU) risk profiles. The Group also drives the full implementation of Basel II/III and manages the ICAAP process.

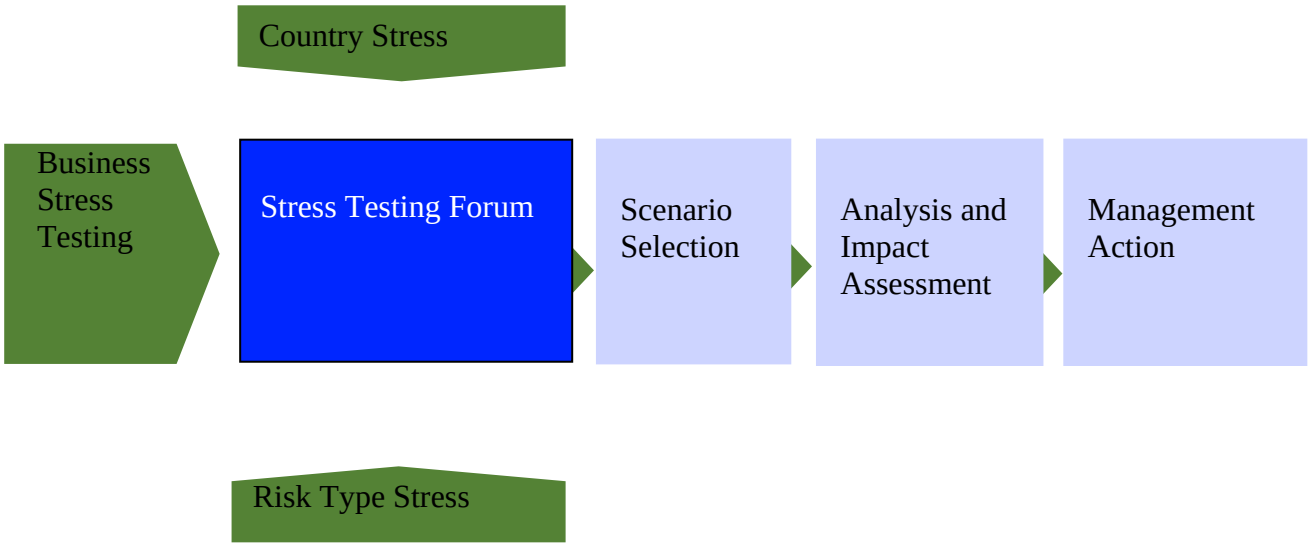
In 2015, the Group deepened the Risk Embedded Performance Management Framework as part of the process of maintaining and aligning behaviours with the Bank's moderate risk appetite. Business performance will subsequently be monitored with a focus on financial performance and risk exposures being aligned with the Bank's risk appetite. The 2016 Budget was built with risk appetite as an integral part of the financial target determination. Varieties of triggers were employed and an automated process was created to efficiently track compliance and apply a risk charge to the various SBUs where there are.

2.4.1.3 Integrated Risk Reporting

The Group strives to improve all in-house analytical reporting of risk management in the Bank and stimulate a culture of data-driven analytical insights for every decision impacting all risk touch points in the risk management process.

The quality of risk reporting was also enhanced in 2015 by implementing an automated risk reporting system known as the Risk Management Report Portal and the subsequent inclusion of the Subsidiary Risk Management portal. This has led to easy and timely access to risk reports, provided early warning signals, better limit monitoring and better decision making for all units across risk management.

Stress testing framework



Our stress testing framework is designed to:

- contribute to the setting and monitoring of risk appetite
- identify key risks to our strategy, financial position, and reputation
- examine the nature and dynamics of the risk profile and assess the impact of stresses on our profitability and business plans
- ensure effective governance, processes and systems are in place to co-ordinate and integrate stress testing
- inform senior management
- ensure adherence to regulatory requirements

3. Internal Capital Adequacy Assessment Process

The ICAAP process as stipulated in Pillar 2 of Basel 3 requires banks to identify and assess risks, maintain sufficient capital required to be held against identified material risks and apply appropriate risk-management techniques to maintain adequate capitalization. The Internal Capital Adequacy Assessment Process document is produced annually and sets out the results of Access Bank PLC own assessment of its internal capital requirements in accordance with Pillar II framework. A less detailed summary of risk assessments and capital requirements is produced on a quarterly basis. The purpose is to determine the adequate level of capital to support the Bank's business strategy and ensure adequate capital levels with regards to the associated risks. The report also includes background information concerning the Bank's organisation structure and the policies that underpin the Bank's risk assessment and risk management systems.

In preparing the document, the Bank leveraged on the following guidelines:

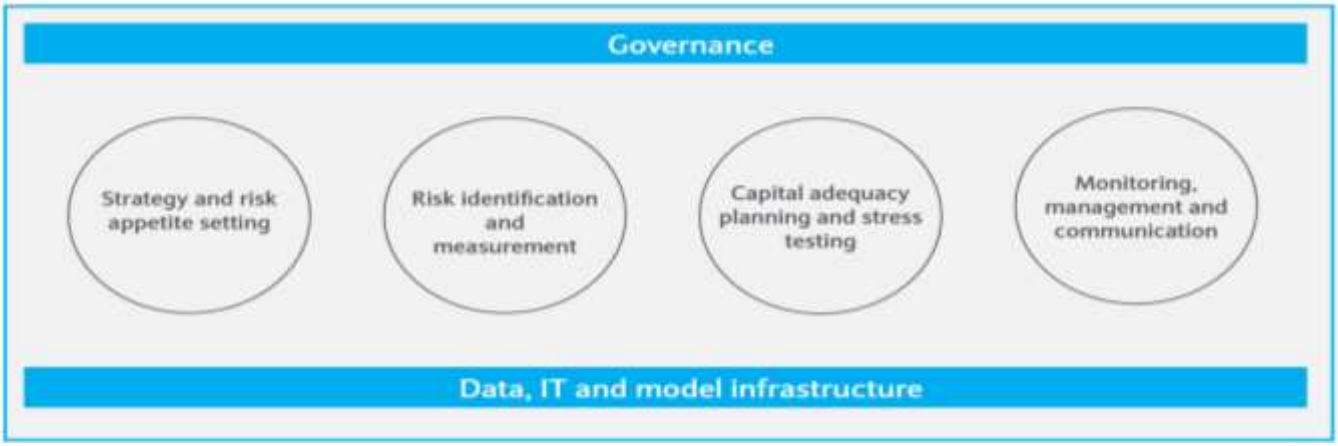
- CBN Guidance note on Supervisory Review Process
- Statement of Policy :The Prudential Regulations Authority (PRA) methodologies for setting Pillar 2 capital (July 2015)
- European Banking Authority (EBA):
  I. Regulatory Technical Standards (EBA/RTS/2014/11)
  II. Guidelines (GL/2015/02)

The Board formally approves the ICAAP document and subsequently reviews it annually or whenever it is considered necessary in the light of changes in market situations or specific circumstances.

3.1. ICAAP Governance Structure

The efficient use of capital is fundamental to enhance shareholder value through careful deployment of capital resources. The ICAAP framework ensures that internal systems, controls and management information are in place to enable the Board and senior management to track changes in the economic environment, which may require adjustments to the business strategy in order to remain within the risk appetite. Furthermore, ICAAP reflects the level of capital required to be held against identified material risks the Group is, or may become exposed to, as a result of its strategy. From a Group consolidated perspective, capital adequacy is considered for each regulated entity as well as the Group. Capital management is an integral part of decision-making within the Group. Progress is measured against pre-determined targets in the balanced scorecard which incorporates capital metrics. Decisions on the allocation of capital resources, which are an integral part of the ICAAP and capital management process, are based on a number of factors including return on regulatory capital. The Board of Directors and its committees, the ERMC, and the Asset/Liability Committee (ALCO) form the core governance bodies related to ICAAP.

The building blocks of the Bank's ICAAP are as follows:



3.2. Regulatory Capital Composition

Access Bank's regulatory capital comprises of the two distinct elements which are classified as Tier 1 and Tier 2 capital; The CBN Guidance notes on Regulatory Capital provides the content for Tier 1 and Tier 2 capital. According to the CBN guidance note, the following qualify as Tier 1 capital.

- Paid-up share capital;
- Irredeemable preference shares;
- Share premiums;
- General reserve (retained profit),
- SMEEIS reserves,
- Statutory reserve;
- Other reserves as may be determined by the CBN.

While Tier 2 Capital comprises of.

- Hybrid Instruments
- Subordinated Debt
- Other Comprehensive Income.

The following are deductions made from capital include;

- Intangible assets
- Investments in unconsolidated subsidiaries
- Deferred Tax Assets
- Treasury Shares

Access Bank Regulatory Capital Computation

	Dec-16	Dec-15
Paid-up Share capital	14,463,986,000	14,463,986,550
Irredemable Preference Shares		
Share premium	197,974,816,000	197,974,816,000
General reserve (Retained Profit)	93,329,188,000	87,285,484,262
SMEEIS reserve		
Statutory reserve	53,001,072,000	43,397,151,829
Other reserves	38,547,347,000	4,016,412,000
Tier 1 Capital Before Regulatory Deduction	**397,316,409,000**	**347,137,850,641**
Regulatory Deduction		
Goodwill		
Deferred Tax Assets		10,180,832,000
****Other intangible assets***	5,173,783,752	4,977,908,000
Current year losses		
Under impairment	35,058,266,000	37,826,382,111
Treasury Shares		527,331,000
	40,232,049,752	53,512,453,111
Tier 1 Capital After Regulatory Deduction	**357,084,359,248**	**293,625,397,530**
Other Deductions		
Investment in the capital of financial subsidiaries	29,619,625,820	22,719,623,000
Eligible Tier 1 Capital	**327,464,733,428**	**270,905,774,530**
Tier 2 Capital: Instruments & Reserves		
Sub-ordinated debt	97,600,000,000	78,516,655,000
Other Comprehensive Income	24,362,211,325	13,291,054,000
Tier 2 Capital Before Deductions (maximum of one-third (i.e. 33.33%) of Tier 1 capital, after making deductionsfor goodwill, deferred tax asset (DTA) and other intangible assets but before deductions of investments.)	119,028,119,749	91,807,709,000
Deductions		
Investment in the capital of financial subsidiaries	29,619,625,820	22,719,623,000
Eligible Tier 1 Capital	**89,408,493,929**	**69,088,086,000**
TOTAL ELIGIBLE CAPITAL	**416,873,227,357**	**339,993,860,530**

The N97.6Bn subordinated debt qualifies as Tier-2 Capital as per the CBN guideline on Regulatory Capital. The subordinated debt consists of the US$400,000,000 subordinated notes of 9.25% resettable

interest issued on 24 December 2014 with a maturity date of 24 December 2021. In 2016, the subordinated debt was amortised by 20% as per the CBN guideline.

3.3. Capital Management

Capital risk is the risk that the Bank's total capital base is not properly managed in a prudent manner. The Group's capital management strategy is focused on maximizing shareholder value by optimizing the level and mix of capital resources. Decisions on the allocation of capital resources are based on a number of factors including return on economic capital (EC) and on regulatory capital (RC), and are part of the internal capital adequacy assessment process (ICAAP).

3.3.1. Capital management objectives

The Bank has a number of capital management objectives:

• To meet the capital ratios required by its regulators and the Group's Board;

• To generate sufficient capital to support asset growth;

• To maintain an investment grade credit rating; and

• To achieve a return above the cost of equity

3.3.2. Capital Management Process

Capital is managed as a Board level priority in the Bank which reflects the importance of capital planning. The Board is responsible for assessing and approving the Group's Capital Management Framework, capital target levels and capital strategy. The Capital Management Framework provides effective capital planning, capital issuance, Basel II alignment, Economic Capital (EC) utilisation and economic profit (EP) performance measurement criteria.

The above diagram illustrates the process the Bank follows to ensure end-to-end integration of the

Bank's strategy, risk management and financial processes into the capital management process. The purpose is to ensure that capital consumption in the business divisions has an impact on performance measurement, which in turn translates into management performance assessment and product pricing requirements and achievement of the overall strategy within risk appetite.

3.4. Summary of Capital Adequacy

The table below sets out the summary of capital adequacy based on Access Bank's financial position as at December 2016 and projected periods of 2017, 2018 and 2019.

Base Case (NGN 000s)	2016	2017	2018	2019
Pillar 1 requirements				
Credit Risk	**261,961,215**	**288,157,336**	**316,973,070**	**348,670,377**
Market Risk	**6,807,184**	**7,624,046**	**8,233,969**	**8,892,687**
Operational Risk	**27,998,386**	**32,510,625**	**39,701,734**	**51,296,296**
Total Capital Pillar 1 Requirement	**296,766,784**	**328,292,007**	**364,908,773**	**408,859,359**
Pillar 2 Requirements (12%,13% and 14% of Pillar 1)	**21,956,718**	**45,960,881**	**54,736,316**	**65,417,497**
Total of Pillar 1, Pillar 2	**318,723,502**	**374,252,888**	**419,645,089**	**474,276,857**
Total Capital Available	**416,873,227**	**496,285,417**	**573,167,778**	**664,995,645**
Surplus/Deficit versus Pillar 1 and Pillar 2 Requirements	**98,149,725**	**122,032,529**	**153,522,689**	**190,718,789**

It can be clearly seen that the Bank has adequate capital to meet the Pillar 1 (Credit, Market and Operational Risks) and Pillar 2 material risks inherent in is business for the base and projected periods 2017 to 2019.

3.5. Basel 3 Leverage Ratio

As a response to the global financial crisis, the Basel Committee on Banking Supervision (BCBS) decided to undertake a major reform of the regulatory framework of the banking system. (BCBS press release of 12 January 2014 on BCBS (2014a), Basel III leverage ratio framework and disclosure requirements)

Basel III introduced a minimum "leverage ratio"- a non-risk-based leverage ratio. The Basel III standard on Leverage Ratio aims to strengthen the requirements from the ***Basel II*** standard on bank's minimum capital ratios which is a risk based assessment of capital requirement i.e. The CAR under Pillar I & ICAAP under Pillar 2. Under the new Basel III banking regulations, a non-risk-based leverage ratio (LR) requirement will be introduced alongside the risk based capital framework (BASEL II) with the aim to "restrict the build-up of excessive leverage in the banking sector to avoid "destabilizing -deleveraging"

processes that can damage the broader financial system and the economy" i.e. to enhance Bank's stability

The Basel III framework introduced a simple, transparent, non-risk based leverage ratio to act as a credible supplementary measure to the risk-based capital requirements.

Calculated by dividing Tier 1 capital by the bank's average total consolidated assets (sum of the exposures of all assets and non-balance sheet items), banks are expected to maintain a leverage ratio in excess of 3% under Basel III.

$$\textbf{Leverage ratio} = \frac{Capital\ measure}{Exposure\ measure} \geq 3\%$$

Access Bank Leverage Ratio = 10.08%

The Bank's Total leverage ratio exposure consists of the components Derivatives, securities financing transactions (SFTs), off balance-sheet exposure and other on-balance sheet exposure (excluding derivatives and SFTs).

Here, the Bank's total on- Balance sheet exposure is the actual balance sheet amount unlike in the Risk based approach (Basel II) where total exposure is risk weighted assets with the same nominal value but of different "riskiness" are treated equally and face the same capital requirement under the non-risk-based LR.

The leverage exposure for derivatives is calculated by using the regulatory mark-to-market method for derivatives comprising the current replacement cost plus a regulatory defined add-on for the potential future exposure. Variation-margin received in cash from counterparties is deducted from the current replacement cost portion of the leverage ratio exposure measure and variation margin paid to counterparties is deducted from the leverage ratio exposure measure related to receivables recognized as an asset on the balance sheet, provided certain conditions are met.

The SFT component includes the gross receivables for SFTs, which are netted with SFT payables if specific conditions are met. In addition to the gross exposure a regulatory add-on for the counterparty credit risk is included.

The Off-balance sheet exposure component follows the credit risk conversion factors (CCF) of the standardized approach for credit risk (0 %, 20 %, 50 %, or 100 %), which depend on the risk category subject to a floor of 10 %.

The other on-balance sheet exposure component (excluding derivatives and SFTs) reflects the accounting values of the assets (excluding derivatives and SFTs) as well as regulatory adjustments for asset amounts deducted in determining Tier 1 capital.

Moving from a solely risk based approach - leverage ratio requirement- should only lead to limited additional risk-taking relative to the induced benefits of increasing loss-absorbing capacity, thus resulting in more stable banks

According to Basel the, leverage ratio is intended to:

• Restrict the build-up of leverage in the banking sector to avoid destabilising deleveraging processes that can damage the broader financial system and the economy; and
• Reinforce the risk-based requirements with a simple, non-risk based “backstop” measure.

4. Internal Liquidity Adequacy Assessment Process

ILAAP is the process for identifying, measuring, managing and monitoring liquidity and funding risks by a Bank. It contains all qualitative and quantitative information necessary to underpin the Bank's liquidity risk appetite, including the description of the systems, processes and methodology for measuring and managing liquidity and funding risks.

The Board of Directors (hereafter “Board”) is responsible for the ILAAP and has established the design and structure of the ILAAP in accordance with the liquidity risk profile of the Bank and its moderate liquidity risk appetite.

The ILAAP process is completed and reviewed annually or more frequently when there are significant changes to the business, strategy or external operating environment of the Bank.

4.1. Purpose of ILAAP

The objectives of ILAAP are as follows:

- To ensure that the Bank has adequate liquidity to support its operations
- To demonstrate to key stakeholders (i.e. regulators, investors, customers) the adequacy of the Bank’s liquidity risk management (LRM) process, thereby gaining market confidence
- ILAAP provides a holistic view of LRM in the Bank.
- ILAAP can also be used as a strategic decision making tool to ensure that growth strategy is in alignment with sound LRM practices

4.2. ILAAP Structure

The Bank’s ILAAP is structured in line with De Nederlandsche Bank (DNB) supervision manual on the “Principles of the ILAAP”. It essentially contains two elements i.e. qualitative and quantitative elements.

The qualitative elements describe among other things, the expectations on risk governance with a focus on liquidity risk. These elaborate on aspects relating to the Bank’s liquidity risk strategies, procedures, measures and the liquidity cushions to be maintained by the Bank. The quantitative aspects of the ILAAP are directly linked to the qualitative elements and they include limits, maturity calendars, liquidity risk metrics and stress testing.

4.2.1. Qualitative assessment

The Board has put in place policies, processes and systems that enable it to identify, measure, manage and monitor liquidity risk and is responsible for approving these overall systems and controls. In setting the Bank's LRM framework, the Board adopted the “Three Lines of Defence Approach”. This is outlined in the following documents:

- Market Risk Appetite Statement
- Contingency Funding Plan (which has been incorporated into the Bank’s Resolution Plan)
- Market Risk Management Limits

- Framework for Managing Foreign Currency Lending and Funding
- Asset and Liability Management Policy
- Procedures for Liquidity Risk Gap Analysis
- Non-maturity and Maturity Account Analysis

4.2.2. Quantitative Assessment

The liquidity adequacy rule states that;

"a firm must at all times maintain liquidity resources which are adequate, both as to amount and quality, to ensure that there is no significant risk that its liabilities cannot be met as they fall due"

This rule has the following requirements:

- Hold sufficient liquidity resources which contain an adequate buffer of high quality, unencumbered assets that are marketable, or otherwise realisable;
- Be able to generate funds from those assets in a timely manner; and
- Maintain a prudent funding profile in which its assets are of appropriate maturities, given the maturity profile of the Bank's liabilities

In order to ensure compliance to the liquidity adequacy rule, the Bank has made an assessment of the overall character of the resources available to it, which enables it to meet its liabilities as they fall due.

The objective of the Bank's quantitative liquidity adequacy assessment is to determine the minimum amount and type of liquidity resources that must be maintained by the Bank to withstand the impact of a range of stress scenarios and ensure compliance with its Risk Appetite limits under both normal and stressed conditions. The key elements in the Bank's liquidity risk quantitative assessment are summed up in the following:

- Materiality assessment of liquidity risk drivers - Identification of material liquidity risks that the Bank is exposed to, including an assessment of the sources of liquidity risk:
  - ✓ This is based on an analysis of the Bank's balance sheet, off balance sheet exposures and the structure of its funding profile.
  - ✓ Liquidity risks are identified and defined based on the ten internationally recognised liquidity risk drivers, together with any additional risks that are considered material to the Bank, with each on-balance sheet and off-balance sheet activity mapped to a relevant liquidity risk driver.
  - ✓ Where the liquidity risk drivers are considered immaterial to the Bank, the qualitative assessment supporting this view has been provided.
- Limits and liquidity risk tolerance (risk appetite)
- Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR)
- Stress testing and scenario analysis
- Early warning indicators
- Risk Based Fund Transfer Pricing

4.3. ILAAP Metrics

The assessment of the Bank's liquidity and funding profile was carried out based on the 2016 year-end results, and 2017 projections using the following methodology;

- Materiality Assessment of Liquidity Risk Drivers
- Liquidity Coverage Ratio
- Net Stable Funding Ratio
- Liquidity Ratio
- Stress Test (Static and Dynamic)

4.3.1. Liquidity Coverage Ratio

This is ratio identifies the Bank's available sufficient short-term liquidity (high quality liquid assets of HQLA) to cover short-term liquidity requirements. These requirements are defined as the net outflows over a 30 days' time horizon under an acute liquidity stress scenario for the Bank and the market. As in similar metrics, the available liquidity must exceed the required liquidity, meaning LCR must be at least 100%.

$$LCR = \frac{Stock\ of\ HQLA}{Total\ Net\ Cash\ Outflows} \geq 100\%$$

Access Bank LCR = 168%

The Stock of HQLA contains assets of the only highest credit and liquidity quality such as Federal government bonds and treasury bills, etc. For the denominator, the net cash outflows are considered with a factor of prudence applied to each individual item. This conservative definition ensures that the Bank never has to rely exclusively on expected inflows.

4.3.2. Net Stable Funding Ratio (NSFR)

The NSFR guides the Bank in adopting more stable sources of funding over a longer-time horizon. It defines the amount of available stable funding relative (ASF) to the required stable funding (RSF) over a 1-year time scale. The ASF is defined as the portion of capital and liabilities expected to be reliable over the time horizon considered by the NSFR, which extends to one year. The RSF calculation is a function of the liquidity characteristics and residual maturities of the various on-and off-balance sheet assets specific to the Bank.

The NSFR provides for different ASF and RSF weightings (or 'factors') depending on the type of counterparty and the residual maturity of the transaction.

These are summarized in the below table:

Counterparty type and tenor	ASF Factor	Counterparty type and tenor	RSF factor
Any funding ≥ 12 months	100%	Bank < 6 months	0%
Public sector < 12 months	50%	Bank 6-12 months	50%
Central Bank 6-12 months	50%	All non-banks < 12 months	50%
Bank 6-12 months	50%	Banks > 12 months	100%
Any funding < 6 months	0%	Non-banks > 12 months	100%

$$\text{NSFR} = \frac{Available\ amount\ of\ stable\ funding}{Required\ amount\ of\ stable\ funding} \geq 100\%$$

Access Bank NSFR = 131.9%

4.3.3. Contractual maturity mismatch

The contractual maturity mismatch identifies the gaps between the contractual inflows and outflows of liquidity for defined time bands. These maturity gaps indicate how much liquidity the Bank would potentially need to raise in each of these time bands if all outflows occurred at the earliest possible date. This metric provides insight into the extent to which the bank relies on maturity transformation under its current contracts.

4.4. Summary of 2016 ILAAP Results

The results of the 2016 ILAAP are summarised below.

4.4.1. Materiality Assessment of Liquidity Risk Drivers

The table below summarises the Bank's materiality assessment of liquidity risk drivers

S/N	Liquidity Risk Drivers	Components Where applicable	Materiality Assessment
1	Non Marketable Asset Risk	Non tradability of Loans	Material for both LCY and FCY
2	Wholesale Secured and Unsecured Funding Risk	Legal entities, sole proprietorships or partnerships, Government and Financial institutions	Material for both LCY and FCY
3	Retail Funding Risk	Individual Consumer deposits	Material for both LCY and FCY
4	Off Balance Sheet Risk	Growing size of the derivative book/credit contingents	Material
5	Marketable Assets Risk	Liquid assets are HQLA in line with Basel LCR requirements	Material
6	Intra-group Funding Risk	Takings/placements from and with subsidiaries	Material
7	Intra-day Funding Risk	The risk due to failure to meet payment obligation at the time expected	Material
8	Funding Concentration Risk	Highly material on the FCY book	Material on the FCY portfolio
9	Cross-Currency Risk	N/A. Fully hedged by swaps	Not Material
10	Franchise Viability	Risk that arises as a result of actions taken in order to preserve reputation, resulting in unforeseen liquidity outflows	Not Material

4.4.2. LCR, NSFR, LR, LDR and Survival Period

The table below shows the results of the Bank's liquidity position based on the audited financial statements as at year-end 2016.

Liquidity Metrics		LCY	USD	Consolidated Currencies	Regulatory Requirement
LCR		129.8%	139.5%	168%	80%
NSFR**				132.2%	100%
Liquidity Ratio (LR) ***		43.05%			
Survival Period****	Short-end (Acute Phase)	51 days	27 days		Minimum of 7 days
	Long-end	58 days	30 days		Minimum of 30 days
	90 days Protracted Stress	112 days	83 days		Minimum of 30 days

*The LCR requirement is graduated from 70% in January 2016 to 100% in January, 2019 with an increase of 10% per year up to the year 2019.

**The standard does not require NSFR to be reported in significant currencies.

4.4.3. **Overall Liquidity Adequacy**

Based on the above assessment carried out, the Bank has adequate liquidity to support its current level of operations and its 2017 projections.

5. Recovery and Resolution Plan (RRP)

The 2008/2010 global financial crisis exposed Nigerian banks and the economy in general to unprecedented stress. Poor risk management in Nigerian banks led to the concentration of assets in certain risky areas. The concerns stemmed from the huge deterioration in the quality of banks' assets, liquidity concerns and low capital adequacy ratios. Consequently, the CBN had to intervene to prevent a total collapse of the industry and create stability in the Nigerian financial sector.

The Asset Management Corporation (AMCON) was set up in 2010 to relieve banking sector balance sheets of Non-Performing Loans thereby stimulating lending to the real sector. AMCON has over the period intervened by acquiring Eligible Bank Assets ("EBAs"), issuing financial accommodation securities and employing the bridging option to establish bridge banks as a form of resolution. The various regulatory interventions have been at the expense of taxpayers, as these funds could have been channelled towards infrastructural and human capital development.

Over the years, the failure of some of the hitherto biggest financial institutions sometimes without sufficient early warning signals had huge implications for the financial system and national economies. This became a learning point for regulators worldwide as they devised measures to reduce the impact of these bank failures on the financial system. Part of these measures included drawing up criteria to determine Systematically Important Financial Institutions (SIFIs).

The Financial Stability Board describes Systematically Important Financial Institutions (SIFIs) as "financial institutions whose distress or disorderly failure, because of their size, complexity and systemic interconnectedness, would cause significant disruption to the wider financial system and economic activity".

The CBN designated eight banks as Domestic Systemically Important Banks (D-SIBs) in November 2013 and issued requirements for Recovery and Resolution Plans to be submitted by 1st January of every year. Access Bank was designated as a D-SIB, accordingly we have updated the Bank's 2016 recovery plan ('Recovery Plan') and made submissions to the relevant regulators. The Recovery Plan is updated at least once a year to reflect changes in the business and the regulatory environment

The Recovery Plan equips the Bank to re-establish its financial strength and viability during an extreme stress situation. The Recovery Plan's raison d'être is to document how we can respond to a financial stress situation that would significantly impact our capital or liquidity position. The plan outlines a set of defined actions, aimed to protect us, our customers and the markets and prevent a potentially more costly resolution event.

5.1. Recovery Plan

The Access Bank Recovery Plan conforms to the following guidelines:

- CBN Minimum Contents for Recovery Plans and Requirements for Resolution Planning. November 2016
- European Banking Authority (EBA):
- Regulatory Technical Standards (EBA/RTS/2014/11)
- Guidelines (GL/2015/02)

- Prudential Regulations Authority (PRA) Policy and Supervisory Statements (PS1/15 and SS18/13)
- Financial Stability Board (FSB) Guidance on Recovery Triggers and Stress Scenarios dated 16 July 2013

Recovery Indicators are metrics that can be used by the Bank to define the points at which to take action under the recovery plan. Indicators are qualitative and quantitative in nature, and draw on our existing risk management frameworks. The Bank currently has several risk related frameworks in place for both financial and non-financial risk, such as the ERM Framework, Contingency Funding Plan (CFP) and Business Continuity Plan (BCP). The Bank's qualitative and quantitative indicators are drawn from our existing risk management frameworks.

Quantitative indicators include Capital, Liquidity, Asset Quality and Earnings indicators. In addition to these, macroeconomic and market-based indicators are used by us to proactively signal negative trends which may harm the Bank. These triggers provide input and support for the continuous monitoring of possible adverse situations and may indicate potential changes in the four key indicators. The trigger levels and thresholds for the indicators were determined based on regulatory requirements (CBN), the Bank's Risk Appetite, as well as global best practices. These indicators have different monitoring frequencies and a threshold breach will trigger a series of actions as specified in the plan.

In line with best practice, we have identified a wide range of recovery options that will mitigate different types of stress scenarios and steer the Bank back to a "BAU" condition. The Bank's ICAAP and ILAAP form the bedrock on which the Scenario Planning and Stress testing are shaped. These scenarios cover both idiosyncratic and market-wide events, which could lead to severe capital and liquidity impacts as well as impacts on our performance and balance sheet. For each recovery option, the impact on capital and liquidity is quantified. The timing to realization of benefits, franchise impact as well as likely effectiveness are evaluated. The implementation plan and timeline are delineated, risks and regulatory considerations are also assessed.

The Board of Directors ("Board") owns and is responsible for the Recovery Plan. The CRO is charged with the responsibility of maintaining the RRP and making submission to the regulatory authorities.

The Recovery Management framework is built upon and closely integrated within existing risk, capital and liquidity management governance frameworks, and policies.

5.2. **Resolution Planning**

Globally, regulators of financial institutions are seeking to mitigate the risk of market-wide disruption from a bank failure as occurred in the previous financial crisis. To facilitate this, information is required from banks to facilitate the ease of resolution by the regulators with minimal distortions and impediments thereby ensuring that the impact of failure is minimised, access to deposits are maintained, payment services continue and the risk of a fire sale of assets, which may cause financial instability, is minimised.

The CBN Minimum Contents for recovery Plans and Requirements for Resolution Planning outlines minimum information which should be included in a resolution pack which would assist the resolution authorities in carrying out their statutory responsibilities. These information have been provided in line with the regulatory guidance.

6. Credit Risk.

6.1. Introduction

Credit risk arises from the failure of an obligor of the Bank to repay principal or interest at the stipulated time or failure otherwise to perform as agreed. This risk is compounded if the assigned collateral only partly covers the claims made to the borrower, or if its valuation is exposed to frequent changes due to changing market conditions (i.e. market risk). The Bank's Risk Management philosophy is that moderate and guarded risk attitude will ensure sustainable growth in shareholder value and reputation. Extension of credit in Access Bank is guided by its Credit Risk and Portfolio Management Plan, which sets out specific rules for risk origination and management of the loan portfolio. The Plan also sets out the roles and responsibilities of different individuals and committees involved in the credit process. The Bank recognises the fact that its main asset is its loan portfolio. Therefore, the Bank actively safeguards and strives to continually improve the health of its loan portfolio.

The goal of the Bank is to apply sophisticated but realistic credit models and systems to monitor and manage credit risk. The pricing of each credit granted reflects the level of risks inherent in the credit. Subject to competitive forces, Access Bank implements a consistent pricing model for loans to its different target markets. The client's interest is guarded at all times, and collateral quality is never the sole reason for a positive credit decision. Provisions for credit losses meet IFRS and prudential guidelines set forth by the Central Bank of Nigeria, both for loans for which specific provisions exist as well as for the portfolio of performing loans. Access Bank's credit process requires rigorous proactive and periodic review of the quality of the loan portfolio. This helps us to identify and remediate credit issues proactively. The Criticized Assets Committee performs a quarterly review of loans with emerging signs of weakness; the Management Credit Committee and the Board Credit Committee also perform reviews of the quality of our loan portfolio on a quarterly basis. These are in addition to daily reviews performed by the various Head of Risk within the Credit Risk Management Groups.

6.2. General Disclosures

Access Bank currently adopts the standardized approach to computing Credit Risk- weighted assets. The table below shows the Bank's Risk Weighted assets for each Exposure Class.

6.2.1. Credit Exposures by Counterparty

Exposure Class	Exposure Amount (N'Mn)	Credit Risk Mitigation (N'Mn)	Net Exposure (N'Mn)	Risk Weighted Asset (N'Mn)
Central Governments and Central Banks	819,476.19	-	819,476.19	-
State Govt and Local Authorities	272,009.27	8,618.02	263,391.26	263,391.26
Supervised Institutions	171,433.02	3,094.28	168,338.74	115,876.48
Corporate and Other Persons	1,127,149.32	170,465.91	956,683.41	956,683.41
Regulatory Retail Portfolio	52,825.06	2,880.33	49,944.73	37,458.55
Secured by Mortgages on Residential Properties	5,135.61	849.21	4,286.40	3,214.80
Exposures Secured by Mortgages on Commercial Real Estates	125,842.82	12,745.04	113,097.78	113,097.78
Past Due Exposures	13,513.25	0.01	13,513.23	13,513.23
High Risk Exposures	3,145.70	-	3,145.70	4,718.55
Other Assets	283,584.09	-	283,584.09	176,989.88
Off Balance Sheet	352,868.11	90,283.29	92,163.24	89,490.31

6.2.2. Credit Exposures by Sectors

The table below shows the Bank's total Loan exposure to different sectors. The total loan exposure increased by 28% from 2015 to 2016.

	2016 N'000	2015 N'000
Agriculture	16,358,431	15,937,248
Construction	107,339,808	76,829,699
Education	1,411,646	2,016,754
Finance and insurance	21,309,881	18,642,306
General	58,753,541	52,277,961
General commerce	139,729,100	133,869,178
Government	265,300,462	168,626,536
Information And communication	114,360,925	118,922,511
Other Manufacturing (Industries)	77,233,498	57,301,618
Basic Metal Products	2,978,984	2,682,493
Cement	26,141,390	26,147,216
Conglomerate	31,074,505	14,766,577
Steel Rolling Mills	65,431,551	53,920,584
Flourmills And Bakeries	5,045,937	13,642
Food Manufacturing	22,140,950	14,642,665
Oil And Gas - Downstream	130,605,016	115,343,768
Oil And Gas - Services	201,268,821	115,659,696
Oil And Gas - Upstream	105,211,512	61,020,646
Crude oil refining	33,386,262	28,860,271
Real estate activities	128,653,753	100,157,931
Transportation and storage	52,966,761	70,899,610
Power and energy	9,465,028	8,099,644
Professional, scientific and technical activities	1,913,153	6,727,525
Others	6,756,944	6,755,313
TOTAL	**1,624,837,859**	**1,270,121,392**

The table below shows the Credit concentration by different Regions.

Bank December 2016	Nigeria	Rest of Africa	Europe	Others	Total
In thousands of Naira					
Cash and balances with banks					-
Investment under management					-
Non pledged trading assets					
Treasury bills					-
Bonds					-
Derivative financial instruments					-
Loans and advances to banks					-
Loans and advances to customers					
Auto Loan	4,366,543.64				4,366,543.64
Credit Card	3,922,376.65				3,922,376.65
Finance Lease	3,987,897.60				3,987,897.60
Mortgage Loan	4,996,951.73				4,996,951.73
Overdraft	130,285,663.39				130,285,663.39
Personal Loan	16,789,103.90				16,789,103.90
Term Loan	1,017,646,254.86				1,017,646,254.86
Time Loan	412,567,553.68				412,567,553.68
Pledged assets					
Treasury bills					-
Bonds					-
Investment securities					
Available for sale					
Treasury bills					-
Bonds					-
Held to Maturity					
Treasury bills					-
Bonds					-
Other assets					-
Total	**1,594,562,345**	**-**	**-**	**-**	**1,594,562,345**
Credit risk exposures relating to othr credit commitments at gross amount					
Transaction related bonds and guarantees	136,163,848				136,163,848
Guaranteed facilities	85,513,821				85,513,821
Clean line facilities for letters of credit and other commitments	1,062,216,746				1,062,216,746
Total	**1,283,894,414**	**-**	**-**	**-**	**1,283,894,414**

6.2.3. **Credit Concentration by Business Segments**

The table below shows the Credit concentration by different Business segments.

	Corporate (N'000)	Commercial (N'000)	Bank (N'000)	Retail (N'000)	Government (N'000)	Others (N'000)	Total (N'000)
Cash and balances with banks	-	-	480,395,147.00	-	-	-	480,395,147
Investment under management	10,913,760	-	1,070,385.00	-	2,887,102	-	14,871,247
Non pledged trading assets							
Treasury bills	-	-	-	-	34,381,635	-	34,381,635
Bonds	-	9,913	8,391.00	-	10,170,293	-	10,188,597
Derivative financial instruments	28,003,737	-	5,360,808.00	-	122,408,117	-	155,772,662
Loans and advances to banks	-	-	104,006,574.00	-	-	-	104,006,574
Loans and advances to customers							
Auto Loan	-	-	-	4,366,544	-	-	4,366,544
Credit Card	26,799	-	-	3,895,578	-	-	3,922,377
Finance Lease	2,404,390	1,259,848	-	312,384	11,275	-	3,987,898
Mortgage Loan	-	18,242	-	4,978,710	-	-	4,996,952
Overdraft	19,595,999	104,350,992	-	6,318,069	20,603	-	130,285,663
Personal Loan	-	-	-	16,789,104	-	-	16,789,104
Term Loan	371,285,015	375,330,466	-	5,193,606	265,837,168	-	1,017,646,255
Time Loan	176,512,323	235,178,172	-	669,550	207,509	-	412,567,554
Pledged assets							
Treasury bills	-	-	-	-	188,239,520	-	188,239,520
Bonds	-	-	-	-	126,707,982	-	126,707,982
Investment securities						-	
Available for sale	-	-	-	-	40,960,665	-	40,960,665
Treasury bills	377,207	-	5,814,936	-	15,507,737	-	21,699,880
Bonds							
Held to Maturity							
Treasury bills	-	-	-	-	-	-	-
Bonds	3,036,929	-	1,032,857	-	36,293,265	-	40,363,051
Other assets	17,580,637	1,895,503	1,426,691	3,706,154	4,430,246	4,225,841.00	33,265,072
Total	629,736,797	718,043,135	599,115,790	46,229,699	848,063,117	4,225,841	2,845,414,378

Statement of prudential adjustments Provisions under prudential guidelines are determined using the time based provisioning regime prescribed by the Revised CBN Prudential Guidelines. This is at variance with the incurred loss model required by IFRS under IAS 39. As a result of the differences in the methodology/provision regime, there will be variances in the impairments allowances required under the two methodologies. Paragraph 12.4 of the revised Prudential Guidelines for Deposit Money Banks in Nigeria stipulates that Banks would be required to make provisions for loans as prescribed in the relevant IFRS Standards when IFRS is adopted. However, Banks would be required to comply with the following:

a) Provisions for loans recognised in the profit and loss account should be determined based on the requirements of IFRS. However, the IFRS provision should be compared with provisions determined under prudential guidelines and the expected impact/changes in general reserves should be treated as follows:

• Prudential Provisions is greater than IFRS provisions; the excess provision resulting should be transferred from the general reserve account to a “regulatory risk reserve”.

• Prudential Provisions is less than IFRS provisions; IFRS determined provision is charged to the statement of comprehensive income.

The cumulative balance in the regulatory risk reserve is thereafter reversed to the general reserve account

6.2.4. Allowances for credit losses (Impairment)

Loans and advances to banks and customers are accounted for at amortised cost and are evaluated for impairment on a basis described in accounting policy 3.9 “The Bank reviews its loan portfolios to assess impairment at least on a half yearly basis. In determining whether an impairment loss should be recorded in the income statement, the Bank makes judgements as to whether there is any observable data indicating an impairment trigger followed by measurable decrease in the estimated future cash flows from a portfolio of loans before the decrease can be identified with that portfolio. This evidence may include observable data indicating that there has been an adverse change in the payment status of borrowers in a bank, or national or local economic conditions that correlate with defaults on assets in the Bank. The Bank makes use of estimates based on historical loss experience for assets with credit risk characteristics and objective evidence of impairment similar to those in the portfolio when scheduling future cash flows. The methodology and assumptions used for estimating both the amount and timing of future cash flows are reviewed regularly to reduce any differences between loss estimates and actual loss experience. The specific component of the total allowances for impairment applies to financial assets evaluated individually for impairment and is based upon management’s best estimate of the present value of the cash flows that are expected to be received. In estimating these cash flows, management makes judgements about a debtor’s financial situation and the net realisable value of any underlying collateral. Each impaired asset is assessed on its merits, and the workout strategy and estimate of cash flows considered recoverable are independently reviewed by the Credit Risk Management Department (CRMD).

New and amended standards and interpretations not yet adopted by the Group

As at 2016 year end, a number of standards and interpretations, and amendments thereto, had been issued by the IASB which are not yet effective for the Bank’s financial statements. Details are set out below.

IFRS 9 Financial Instruments: Classification and Measurement (effective 1 January 2018)

IFRS 9 is part of the IASB's project to replace IAS 39. It addresses classification, measurement and impairment of financial assets as well as hedge accounting. IFRS 9 replaces the multiple classification and measurement models in IAS 39 with a single model that has only three classification categories: amortized cost, fair value through OCI and fair value through profit or loss. It includes the guidance on accounting for and presentation of financial liabilities and de-recognition of financial instruments which was previously in IAS 39. Furthermore for non-derivative financial liabilities designated at fair value through profit or loss, it requires that the credit risk component of fair value gains and losses be separated and included in OCI rather than in the income statement. IFRS 9 also requires that credit losses expected at the balance sheet date (rather than only losses incurred in the year) on loans, debt securities and loan commitments not held at fair value through profit or loss be reflected in impairment allowances. The bank is yet to quantify the impact of this change although it is expected to lead to an increased impairment charge than recognized under IAS 39. Furthermore, the IASB has amended IFRS 9 to align hedge accounting more closely with an entity's risk management. The revised standard establishes a more principles-based approach to hedge accounting and addresses inconsistencies and weaknesses in the current model in IAS 39. The bank is yet to quantify the impact of these changes on its financial statements. The Bank is currently at the impact assessment phase of the IFRS 9 journey. The focus is on understanding the IFRS 9 financial and operational implications, with outcomes being key inputs to the design and implementation phases. Also, the phase will help the bank identify any gaps with the implementation of IFRS 9, especially in terms of the people, processes, technology and controls that will be necessary to drive an effective implementation. The Bank expects to enter the Design phase by Q1, 2017. This phase will involve obtaining information from current systems, adjusting the IT systems to capture the additional data requirements and determination of what constitutes a default and significant credit loss. By Q2 2017, will be ready for a parallel run of the IFRS 9 and IAS 39 standards.

A collective component of the total allowance is established for:

• Groups of homogeneous loans that are not considered individually significant and

• Groups of assets that are individually significant but were not found to be individually impaired

Collective allowance for groups of homogeneous loans is established using statistical modelling of historical trends of the probability of default, timing of recoveries and the amount of loss incurred, adjusted for management's judgement as to whether current economic and credit conditions are such that the actual losses are likely to be greater or less than suggested by historical modelling. Default rates, loss rates and the expected timing of future recoveries are regularly benchmarked against actual outcomes to ensure that they remain appropriate. "Collective allowance for group of assets that are individually significant but that were not found to be individually impaired cover credit losses inherent in portfolios of loans and advances and held to maturity investment securities with similar credit characteristics when there is objective evidence to suggest that they contain impaired loans and advances and held to maturity investment securities, but the individual impaired items cannot yet be

identified. In assessing the need for collective loan loss allowances, management considers factors such as credit quality, portfolio size, concentrations, and economic factors. In order to estimate the required allowance, assumptions are made to define the way inherent losses are modelled and to determine the required input parameters, based on historical experience and current economic conditions. The accuracy of the allowances depends on estimates of future cash flows for specific counterparty allowances and the model assumptions and parameters used in determining collective allowances are estimated.

6.3. Principal Credit Policies

The following are the principal credit policies of the Bank:

- **Credit Risk Management Policy:** The core objective is to enable maximization of returns on a risk adjusted basis from banking book credit risk exposures that are brought under the ambit of Credit Risk Management Policy by putting in place robust credit risk management systems consisting of risk identification, risk measurement, setting of exposure & risk limits, risk monitoring & control and reporting of credit risk in the banking book.
- **Credit Risk Mitigant Management Policy**: The objective is to aid in effective credit portfolio management through mitigation of credit risks by using credit risk mitigation techniques.
- **Credit Risk Rating Policy:** The objective of this policy is to ensure reliable and consistent Obligor Risk Ratings (ORRs) and Facility Risk Ratings (FRRs) throughout Access Bank and to provide guidelines for risk rating for retail and non-retail exposures in the banking book covering credit and investment books of the Bank.
- **Country and Cross Border Risk Management Policy:** The objective of this policy is to establish a consistent framework for the identification, measurement and management of country risk across Access Bank.

6.4. Credit Risk Measurement Risk Rating

The credit rating of the counterparty plays a fundamental role in final credit decisions as well as in the terms offered for successful loan applications. Access Bank employs a robust credit rating system based on international best practices (including Basel II recommendations) in the determination of the Obligor and Facility risks and thus allows the Bank to maintain its asset quality at a desired level. In Access Bank, the objective of the Risk Rating Policy is to ensure reliable and consistent Obligor Risk Ratings (‘ORRs’) and Facility Risk Ratings (‘FRRs’) throughout the Bank and to provide guidelines for risk rating for retail and non – retail exposures in the bank. The Risk rating policy incorporates credit risk rating models which estimate risk of obligor default and facility risks (covering both recovery as well as exposure risk). These models are currently based on expert judgment for Retail and Non-Retail Exposures. Our goal is to adopt the Internal Rating Based (“IRB”) approach. The data required to

facilitate the IRB approach are being gathered. All Access Bank businesses that extend credit are subject to the Risk Rating Policy.

The following are the credit risk rating models deployed by Access Bank.

Retail Exposures

Obligor Risk Rating (ORR) Models have been developed for:

1 Personal Loans

2 Credit Cards

3 Auto Loans

4 Mortgage Loans

Facility Risk Rating (FRR) Models have been developed for:

1 Loss Given Default (LGD)

2 Exposure at Default (EAD)

Non – Retail Exposures

Obligor Risk Rating (ORR) Models have been developed for:

1 Sovereign (Approach to rating Sovereign Exposures using External ratings)

2 Bank and NBFIs

3 Corporate - Manufacturing Sector - Trading Sector - Services Sector - Real Estate Sector

4 Small and Medium Enterprises (SME) Without Financials

Facility Risk Rating (FRR) Models have been developed for

1 Loss Given Default (LGD)

2 Exposure at Default (EAD)

6.4.1. Risk Rating Process

In Access Bank, all businesses must have a documented and approved Risk Rating Process for deriving risk ratings for all obligors and facilities (including those covered under Credit Programs). The Risk Rating Process is the end-to-end process for deriving ORRs and FRRs and includes models, guidelines, support adjustments, collateral adjustments, process controls, as well as any other defined processes that a business undertakes in order to arrive at ORRs and FRRs. Risk rating process of each business must be in compliance with the Bank's Risk rating Policy and deviations must be explicitly approved.

Establishing the Risk Rating Process is the joint responsibility of the Business Manager and the Credit Risk Manager associated with each business. The process must be documented and must be approved by the Management Credit Committee.

The Risk Rating Process for each business must be reviewed and approved every three years, unless more frequent review is specified as a condition of the approvals. Interim material changes to the Risk Rating Process, as determined by the Credit Risk Manager for the business, must be re-approved. Risk Rating Scale and external rating equivalent Access Bank operates a 12-grade numeric risk rating scale. The risk rating scale runs from 1 to 8. Rating 1 represents the best obligors and facilities and rating 8 represents the worst obligors and facilities. The risk rating scale incorporates sub-grades and full grades reflective of realistic credit migration patterns

Access Bank Total Loans By Risk Rating Class

Credit Quality by Risk Rating Class *In thousands of Naira*			Loans and advances to individuals		Loans and advances to corporates		Loans and advances to banks	
Neither past due nor impaired:								
External Rating Equivalent	Grade	Risk Rating	December 2016	December 2015	December 2016	December 2015	December 2016	December 2015
AAA	Investment	1	-	-	138,494,537	163,854,025	103,319,435	59,780,341
AA	Investment	2+	-	-	171,528,084	126,296,312	-	-
A	Investment	2	-	-	190,643,315	161,182,597	-	-
BBB	Investment	2-	-	-	250,427,658	239,624,041	-	-
BB+	Standard	3+	698,134	1,168,452	236,768,708	104,007,186	-	-
BB	Standard	3	33,111,826	31,339,177	428,534,577	327,464,392	648,871	631,423
BB-	Standard	3-	577,003	668,080	82,264,705	61,485,857	-	-
B	Non-Investment	4	-	15,970	53,294,762	19,720,718	-	-
B-	Non-Investment	5	-	98,939	3,335,377	1,655,959	-	-
CCC	Non-Investment	6	542,663	337,501	6,411,633	5,279,380	-	-
C	Non-Investment	7	833,271	953,436	4,339,649	5,592,399	61,654	12,043
D	Non-Investment	8	627,308	1,192,350	22,404,651	18,184,623	-	-
Gross amount			36,390,205	35,773,905	1,588,447,654	1,234,347,487	104,029,960	60,423,807
Collective impairment			(1,039,812)	(861,632)	(19,151,386)	(16,871,228)	(23,386)	(9,086)
Specific impairment			(405,200)	(250,624)	(9,679,116)	(8,922,599)	-	-
Carrying amount			**34,945,193**	**34,661,649**	**1,559,617,153**	**1,208,553,660**	**104,006,574**	**60,414,721**

Ageing Analysis of Credit Quality

In thousands of Naira

	Group		Bank	
31 December 2016	Loans to individuals	Loans to corporates and banks	Loans to individuals	Loans to corporates and banks
Past due but not impaired:				
Past due up to 30 days	658,807	4,099,130	137,463	727,602
Past due up to 30 - 60 days	852,431	1,067,363	833,271	757,098
Past due up to 60 - 90 days	690,396	5,034,436	627,308	529,504
Total	2,201,634	10,200,929	1,598,042	2,014,204
Past due and impaired:				
Past due up to 91 - 180 days	405,200	5,727,631	405,200	5,684,031
Past due up to 180 - 360 days	23,012	5,845,857	-	3,582,551
Above 360 days	193,016	27,243,913	-	21,875,146
Total	621,228	38,817,401	405,200	31,141,728

6.5. Collateral Policies

It is the Bank's policy that all credit exposures are adequately collateralised. Credit risk mitigation is an activity of reducing credit risk in an exposure or transferring it to counterparty, at facility level, by a safety net of tangible and realizable securities including approved third-party guarantees/ insurance. In Access Bank, strategies for risk reduction at the transaction level differ from that at the portfolio level. At transaction level, the most common technique used by the bank is the collateralization of the exposures, by first priority claims or obtaining a third party guarantee. For all credit risk mitigants that meet the policy criteria, a clear set of procedures are applied to ensure that the value of the underlying collateral is appropriately recorded and updated regularly. Collateral types that are eligible for risk mitigation include: cash; residential, commercial and industrial property; fixed assets such as motor vehicles, aircraft, plant and machinery; marketable securities; commodities; bank guarantees; and letters of credit. Other techniques include buying a credit derivative to offset credit risk at transaction level. At portfolio level, asset securitisation, credit derivatives etc. are used to mitigate risks in the portfolio.

However, the primary consideration for approving credits is hinged largely on the obligor's financial strength and debt-servicing capacity. The guidelines relating to risk mitigant as incorporated in the guidance note of BCBS on "Principles for the Management of Credit Risk" (September 2000, Paragraph 34) are be taken into consideration while using a credit risk mitigant to control credit risk. "Banks can utilize transaction structure, collateral and guarantees to help mitigate risks (both identified and inherent) in individual credits but transactions should be entered into primarily on the strength of the borrower's repayment capacity. Collateral cannot be a substitute for a comprehensive assessment of the borrower or the counterparty, nor can it compensate for the insufficient information. It should be recognized that any credit enforcement actions (e.g. foreclosure proceedings) can eliminate the profit margin on the transaction. In addition, Banks need to be mindful that the value of collateral may well be impaired by the same factors that have led to the diminished recoverability of the credit".

The range of collaterals acceptable to the Bank includes:

- Cash / Deposit (domestic and foreign currency) with bank including certificates of deposit or comparable instruments issued by the bank.
- Certificates of Deposit from other banks.
- Commodities.
- Debt securities issued by sovereigns and public-sector enterprises.
- Debt securities issued by banks and corporations.
- Equities - Stocks / Share Certificates of quoted blue chip companies • Mortgage on Landed Property
- Asset-backed securities.
-

Charge on assets (Fixed and/or Floating) - premises/ inventory/ receivables/ merchandise/ plant/ machinery etc.

• Negative Pledges • Lien on Asset being financed

• Stock Hypothecation

• Shipping Documents (for imports) • Bankers Acceptance • Life Assurance Policies

6.5.1. Collaterals as Credit Risk Mitigant.

For the purpose of computing Credit Risk weighted assets, the credit risk mitigant used to reduce exposures were Cash held by the Bank as collateral for loans.

7. Market Risk.

7.1. Introduction

Access Bank is faced with the risk of decline in its earnings and capital arising from adverse changes in market variables; such as interest rate and foreign exchange rate. Market Risk is the risk that the value of on/off-balance sheet positions will be adversely affected by movements in equity prices, interest rates, currency exchange rates and commodity prices. Access Bank is exposed to market risk through the positions created in its trading and banking books. Market risk policy, management and control

Over the years, the Nigerian financial market has witnessed a dramatic expansion in the array of financial services and products. This tremendous growth in scale and scope has also generated new risks with global consequences, especially market risk, necessitating an assessment of exposures to the volatility of the underlying risk drivers. These developments have prompted a comprehensive and dynamic Market Risk Policy, ALM Policy, Liquidity Policy, and Stress Testing Policy, etc. to ensure that risks faced across business activities and on an Access Bank Plc Consolidated financial statements.

The Board approves the risk appetite for trading and non-trading activities and risk limits are set within the context of the approved market risk appetite. Limits are set based on the approved risk appetite, underlying liquidity as well as legal limitations on individual positions imposed by the regulatory authorities in Nigeria. The specific limits are proposed by the Group Head, market risk management and the Bank's Chief Risk Officer and approved by the Bank's Executive Management, relevant management committees, and ultimately by the Board. The Bank runs a state-of-the-art integrated and straight through processing treasury system for enabling better measuring, monitoring and managing interest rate and foreign exchange risks in the bank. Liquidity, Exchange Rate, and Interest Rate risks are managed through various metrics viz. Liquidity Gap Analysis, Dynamic Cash Flow Analysis, Liquidity Ratios, Value at Risk (VaR), Earnings at Risk (EaR) and Sensitivity Analysis.

The primary aim of these processes is risk forecasting and impact mitigation through management action and portfolio rebalancing. The risk reporting mechanism in the Bank comprises disclosures and reporting to the various management committees viz. ERM Committee, Asset Liability Committee and the Board Risk Management Committee. The Risk Committees receive daily/weekly risk dashboard and monthly/quarterly reports which are presented at the committee meetings. Depending on the market conditions and risk outlook, recommendations are made to the risk management committees in respect of the market risk profile, risk appetite appraisal; as well as review of limits against actual position. The Bank regularly conducts stress testing to monitor its vulnerability to unfavourable shocks. It monitors and controls its risk, using various internal and regulatory risk limits for trading book and banking book which are set according to a number of criteria including economic scenario, business strategy, management experience, peer analysis and the Bank's risk appetite.

In line with the CBN circular on new capital adequacy framework, Access Bank has adopted the standardised duration approach for market risk and has obtained the board approval for the policy on ICAAP. This policy defines and sets processes to review and improve the techniques used for identification, measurement and assessment of all material risks and resultant capital requirements. Also, the bank has put in place a detailed plan for the full implementation for the Basel II & III frameworks and has also put in place a road map for the migration to more advanced capital computation method which factors in the actual loss experience of the bank.
The Bank manages exposure to market risk in both trading and non-trading portfolios

7.2. Non-trading portfolio

The principal objective of market risk management of non-trading portfolios is to optimize net interest income (NII). Due to the size of the Bank's holdings in rate-sensitive assets and liabilities, a major area of market risk exposures in the bank is the interest rate on the banking book. This risk arises from the mismatch between the future yield on assets and their funding cost, as a result of interest rate changes. The Bank uses a variety of tools to track and manage this risk. Some of the tools include:

- Repricing gap analysis;
- Liquidity gap analysis;
- Earnings-at-Risk (EAR) model using various interest rate forecasts; and
- Sensitivity Analysis.

The repricing gap analysis shows a positive or negative gap depending on the forecast of interest rate movement. The size of the gap is then adjusted to either hedge the NII against changing interest rates or to speculatively increase the NII.

Trading portfolio

The measurement/control techniques used to measure and control traded market risk (interest rate and foreign exchange risk) include daily valuation of positions, limit monitoring, gap analysis, sensitivity analysis, Value at Risk, tail risk, stress testing, e.t.c.

Limits

Specific limits and triggers (regulatory and in-house) have been set across the various market risk areas to prevent undue exposure and the market risk management group ensure that these limits and triggers are adhered to by the bank. The following limits currently exist; Fixed income and FX Open Position Limits (OPL): The Bank, in keeping with the prudency concept, sets its policy limit for Open Position at a level lower than the maximum OPL approved by the regulatory authority. In setting the internal OPL, the following considerations are imperative:

Mark-to-Market (MTM)

The marking-to-market technique establishes historical profit/loss by revaluing money market exposures to prevailing market prices. When no market prices are available for a specific contract period, mark-to-Ms

7.3. Derivatives

The Bank plays a pivotal role in the development of the derivatives market in Nigeria, having executed over 25% of all currency forwards and swaps traded by the CBN as at 30 June 2016. The FMDQ OTC Markets dealing member (banks') turnover ranking shows that Access Bank was number 3 for Foreign Exchange (FX) Derivatives as at October 2016. The Bank was also ranked number 1 in the FX Forwards market, affirming its leadership position in the Derivatives market.

Our framework for managing derivatives guides all derivatives activities. The policy has been approved by the Board of Directors and ownership of the document rests with the Chief Risk Officer. He is responsible for ensuring the implementation of the policy across the Bank, as well as guiding and assisting business and support functions to identify, monitor, access and manage risks related to derivatives activities.

The Board has overall responsibility for managing derivatives hedging risks in the Bank.

7.3.1. Rationale for Derivatives Activities

The Bank may engage in derivative transactions based on one or more of the following objectives:

1. **Hedging**

The Bank might enter a derivative transaction to hedge a risk. In hedging, the derivative position is employed to offset or reduce the risk associated with an existing balance sheet position or future planned transaction. To hedge, the conditions below must exist:

- Prior to the transaction, the Bank does have a risk exposure;
- After the transaction, the Bank reduces its risk exposure;
- At the time of entering into hedging transactions, the hedger knows the benefit- reduced risk; and
- Cost, revenue and risk implication are fully stated vis a vis the objectives of transaction within set limits

2. **Trading**

The Bank may enter into derivative transactions in the course of trading and to meet customers' needs.

3. **Liquidity**

The Bank may engage in derivative transaction for liquidity purposes. For instance, If the Bank intends to diversify its funding mix on the FCY balance sheet, it could execute a total return swap to receive FCY at the spot date and transfer Nigerian Treasury Bills (NTBs) of face value equivalent to 100% plus a

haircut of the USD notional amount to the counterparty and upon maturity in a future date the NTBs will be transferred back to the Bank while the Bank transfers back the FCY received on the spot date.
In summary, the Bank may use derivatives to:

- Limit downside earnings exposure;
- Preserve upside earnings potential; and increase return

7.3.2. Over the Counter Derivative transactions.

Over the counter Derivatives are contracts that are privately negotiated or traded between two parties without going through an exchange or intermediary. The CBN guideline on Credit Risk states that a Bank is only exposed to the potential cost of replacing the cash flow (On contracts showing a positive value) if the counterparty defaults. The Bank includes all the OTC derivatives in its Banking and trading book when calculating its credit exposures arising from interest rate and foreign exchange rates related OTC derivative transactions for capital adequacy purposes.

Access Bank computes its credit exposure for OTC derivative transactions using the **Current Exposure Method**. The exposure is computed by adding.

- the replacement cost (obtained by marking-to-market) of the OTC derivative transaction or in the case of a transaction with negative replacement cost, a value of zero; and
- the amount for potential future exposure obtained by applying the appropriate add-on factor set out in the table below to the notional amount of the OTC derivative transaction;

$$\mathbf{E = Max\ (RC\ or\ 0) + NA * Add\text{-}on\ factor}$$

Where E = exposure,

RC = replacement cost and

NA = notional amount

	OTC Derivative Transaction	Remaining maturity		
		One year or less	Over one year to five years	Over five years
a	Interest Rates	0.00%	0.50%	1.50%
b	Foreign Exchange Rate and Gold	1.00%	5.00%	7.50%

7.4. Market Risk Models

The Bank employs the use of some techniques in managing its exposure to market risk. Some of these techniques are discussed below

7.4.1. Mark-to-Market (MTM)

The marking-to-market technique establishes historical profit/loss by revaluing money market exposures to prevailing market prices. When no market prices are available for a specific contract period, mark-to-model is used to derive the relevant market prices; it is the Bank's policy to revalue all exposures categorized under the securities trading portfolio on a daily basis. As a general guide, marking to market is performed independently of the trading unit i.e. prices/rates are obtained from external sources.

7.4.2. Value at risk (VaR)

The Group applies a 'Value at Risk' (VaR) methodology to its trading portfolios at a group level to estimate the market risk of positions held and the maximum losses expected, based upon a number of assumptions for various changes in market conditions. The Board sets limits on the value of risk that may be accepted for the Group, which are monitored on a daily basis by Market Risk Unit. Interest rate risk in the non-trading book is measured through the use of interest rate repricing gap analysis (Note 5.2.1). VaR is a statistically based estimate of the potential loss on the current portfolio from adverse market movements. It expresses the 'maximum' amount the Group might lose, but only to a certain level of confidence (99%).

There is therefore a specified statistical probability (1%) that actual loss could be greater than the VaR estimate. Value-at-risk estimates the potential maximum decline in the value of a position or portfolio, under normal market conditions, over a one-day holding period. It also assumes that market moves occurring over this holding period will follow a similar pattern. The Group applies these historical changes in rates, prices, etc. directly to its current positions - a method known as historical simulation. Actual outcomes are monitored regularly to test the validity of the assumptions and parameters/ factors used in the VaR calculation.

The Access Bank value-at-risk method incorporates the factor sensitivities of the trading portfolio, the volatilities and correlations of the market risk factors. The group uses the variance covariance method which derives likely future changes in market value from historical market volatility. Value at risks is estimated on the basis of exposures outstanding at the close of business and therefore might not factor in the intra-day exposures. However, the bank does not only base its risk estimates on Value at Risk, it uses Stress tests to provide an indication of the potential size of losses that could arise in extreme conditions by applying a what-if analysis to further complement it. The results of the stress tests are reviewed by senior management in each business unit and by the Board of Directors.

8. Operational Risk.

8.1. Introduction

Operational Risk is the risk of loss resulting from inadequate or failed internal processes, people, or systems, or from external events. Our definition of operational risk excludes regulatory risks, strategic risks and potential losses related solely to judgments with regard to taking credit, market, interest rate, liquidity, or insurance risks. It also includes the reputation and franchise risk associated with business practices or market conduct in which the Bank is involved.

Operational risk is inherent in Access Bank's global business activities and, as with other risk types, is managed through an overall framework designed to balance strong corporate oversight with well-defined independent risk management.

This framework includes:

• Recognized ownership of the risk by the businesses;

• Oversight by independent risk management; and

• Independent review by Corporate Audit.

8.2. Measuring and Managing Operational Risk

The Bank recognizes the significance of operational risk and is committed to enhancing the measurement and management thereof. Within the Bank's operational risk framework, qualitative and quantitative methodologies and tools are applied (Bank-wide) to identify and assess operational risks and to provide management information for determining appropriate mitigating measures. Risk Event Data Collection and Reporting a standard process is used Bank-wide for the recognition, capture, assessment, analysis and reporting of risk events. This process is used to help identify where process and control requirements are needed to reduce the recurrence of risk events. Risk events are loaded onto a central database and reported monthly to the ERMC.

The Bank also uses a database of external public risk events and is part of a consortium of international banks that share loss data information anonymously to assist in risk identification, assessment, modelling and benchmarking. Risk and Control Self-Assessments (RCSA) In order to pro-actively identify and actively mitigate risks, the Operational Risk Management Framework utilizes RCSAs. RCSA is used at a granular level to identify relevant material risks and key controls mitigating these risks. The risks and controls are assessed on a quarterly basis and relevant action plans are put in place to treat, tolerate, terminate or transfer the risks, taking into account the relevant business risk appetites. The RCSA programme is extensive and covers the entire Group. The Internal Audit further tests the effectiveness of the RCSAs within the normal course of auditing and relevant metrics are monitored and actioned where

8.3. Operational Risk Capital Charge

In computing the 2016 Operational Risk capital charge for Access Bank, the basic indicator approach was used. The Basic Indicator Approach allocates operational risk capital using a single indicator, gross

income, as a proxy for the institution's overall operational risk exposure. Banks using this approach must hold capital for operational risk equal to the average of a fixed percentage of annual gross income over the previous three years (this percentage has been set at 15% by the Basel Committee). Gross income is defined as NII plus net non-interest income.

There are no qualifying criteria for the Basic Indicator approach, as it is meant to be applicable by any Bank, regardless of its sophistication or complexity.

The charge may be expressed as follows:

$$(KBIA) = [\Sigma(GI1\text{-}n \times \alpha))]/n$$

Where:

KBIA	The capital charge under the Basic Indicator Approach
GI	Annual Gross Income, where positive, over the previous three years
N	Number of the previous three years for which gross income is positive
A	15%, which is set by the Basel Committee, relating the industry wide level of required capital to the industry wide level of the indicator

8.3.1. *Access Bank 2016 Operational Risk Capital Charge computation.*

Line no. Nature of item	Capital Charge Factor	First Year SUM	Second Year SUM	Third Year SUM	Aggregate Gross Income (years 1 to 3)	Capital Charges
Basic Indicator Approach (BIA)						
Gross Income [see Note 1]	0.15	142,789,696,000.00	199,029,171,362.77	218,148,849,273.86	559,967,716,636.64	83,995,157,495.50
Number of years with positive annual gross income						3.00
Mean Average of Aggregate Capital Charge						27,998,385,831.83
Calibrated Risk-weighted Amount (BIA)						349,979,822,897.90

*Note 1-Gross income should be gross of any provisions (e.g. for unpaid interest), be gross of operating expenses, including fees paid to outsourcing service providers, excludes realised or unrealised profits/losses from sale of securities in banking book and excludes extraordinary or irregular items as well as income derived from insurance.

9. Pillar 2 Risks

9.1. *Interest Rate Risk (Banking Book).*

In computing the Interest rate Risk in the Banking Book (IRRBB) capital charge for Pillar 2, the Economic value of equity (EVE model) was used.The EVE represents the present value of the expected cash flows on assets minus the present value of liabilities of the expected cash flows on the liabilities, plus or minus the present value of the expected cash flows on off balance sheet instruments. This captures repricing risk, Basis Risk, Yield curve risk and option risk as opposed to the Gap measurement method which captures only repricing risk.

EVE is used to measure IRRBB by comparing the base case EVE value with different EVE measures under different interest rate shocks (including shocks relating to increase and reduction in interest rate shocks) .The maximum of the worst aggregated reductions to EVE is taken as the minimum capital requirement for IRRBB. It reflects the worst aggregated reductions in EVE across Basel prescribed interest rate shocks.

9.2. **Liquidity risk.**

Liquidity risk arises when the Bank is unable to meet expected or unexpected current or future cash flows and collateral needs without affecting its daily operations or its financial condition. The Bank is managed to preserve a high degree of liquidity so that it can meet the requirements of its customers at all times including periods of financial stress.

The Bank has developed a liquidity management framework based on a statistical model underpinned by conservative assumptions with regard to cash inflows and the liquidity of liabilities. In addition, liquidity stress tests assuming extreme withdrawal scenarios are performed. These stress tests specify additional liquidity requirements to be met by holdings of liquid assets.

The Bank’s liquidity has consistently been materially above the minimum liquidity ratio and the requirements of its stress tests. Global funding and liquidity risk management activities are centralized within Corporate Treasury. We believe that a centralized approach to funding and liquidity risk management enhances our ability to monitor liquidity requirements, maximize access to funding sources, minimizes borrowing costs and facilitate timely responses to liquidity events. The Bank analyze and monitor our liquidity risk, maintain excess liquidity and access diverse funding sources including our stable deposit base.

The Board approves the Bank’s liquidity policy and contingency funding plan, including establishing liquidity risk tolerance levels. The Group ALCO, in conjunction with the Board and its committees, monitors our liquidity position and reviews the impact of strategic decisions on our liquidity. Liquidity positions are measured by calculating the Bank’s net liquidity gap and by comparing selected ratios with targets as specified in the liquidity risk management manual.

9.2.1. Quantification of Liquidity Risk

Access Bank has adopted both qualitative and quantitative approaches to measuring liquidity risk. Specifically, the Bank adopted the following approaches;

a) Funding and Liquidity plan;
b) Gap Analysis;
c) Ratio Analysis.

The Funding and Liquidity plan defines the Bank's sources and channels of utilization of funds. The funding liquidity risk limit is quantified by calculating liquidity ratios and measuring/monitoring the cumulative gap between our assets and liabilities. The Liquidity Gap Analysis quantifies the daily and cumulative gap in a business as usual environment. The gap for any given tenor bucket represents the borrowings from, or placements to, the market required to replace maturing liabilities or assets. The Bank monitors the cumulative gap as a + or – 20% of the total risk assets and the gap as a + or – 20% of total deposit liabilities.

9.2.2. Limit management and monitoring

Active management of liquidity through the framework of limits and control presented above is possible only with proper monitoring capabilities. The monitoring process focuses on funding portfolios, the forward balance sheet and general indicators; where relevant information and data are compared against limits that have been established. The Bank's Treasury is responsible for maintaining sufficient liquidity by maintaining sufficient high ratio of liquid assets and available funding for near-term liabilities. The secured liquidity measure is calculated and monitored by risk management. Increased withdrawals of short-term funds are monitored through measurements of the deposit base in the Bank. Liquidity risk is reported to the Board of Directors on a quarterly basis.

9.2.3. Contingency funding plan

Access Bank has a contingency funding plan which incorporates early warning indicators to monitor market conditions. The Bank monitors its liquidity position and funding strategies on an ongoing basis, but recognizes that unexpected events, economic or market conditions, earnings problems or situations beyond its control could cause either a short or long-term liquidity crisis. It reviews its contingency funding plan in the light of evolving market conditions and stress test results.

9.3. Credit Concentration Risk

The Herfindahl-Hirschman Index (HHI) was employed to measure the credit concentration risk in sectorial distribution as well as geographical distribution of the Bank's loan portfolio. The HHI is defined as the sum of the squares of the relative portfolio shares of all borrowers (these portfolio shares are calculated using risk-weighted assets (RWAs)). Well-diversified portfolios have an HHI close to 0, whilst the most concentrated portfolios have a number close to 1. In line with international best practice,

Prudential Regulation Authority's mapping model was used to translate the Bank's HHI into a capital charge from a prescribed capital add-on range on ranges to HHI as seen below:

10. Equity Exposures: Disclosures for Banking Book positions.

The Bank uses widely recognised valuation models for determining the fair value of its financial assets. Valuation techniques include net present value and discounted cash flow models, comparison with similar instruments for which market observable prices exist and other valuation models. Assumptions and inputs used in valuation techniques include risk-free and benchmark interest rates, credit spreads and other premia used in estimating discount rates, bond and equity prices, foreign currency exchange rates, equity and equity index prices and expected price volatilities and correlations.

The objective of valuation techniques is to arrive at a fair value measurement that reflects the price that would be received to sell the asset or paid to transfer the liability in an orderly transaction between market participants at the measurement date. For more complex instruments, the Group uses proprietary valuation models, which are usually developed from recognised valuation models. Some or all of the significant inputs into these models may not be observable in the market, and are derived from market prices or rates or are estimated based on assumptions. Examples of instruments involving significant unobservable inputs include certain Investment securities for which there is no active market.

Valuation models that employ significant unobservable inputs require a higher degree of management judgement and estimation in the determination of fair value. Management judgement and estimation are usually required for selection of the appropriate valuation model to be used, determination of expected future cash flows on the financial instrument being valued, determination of the probability of counterparty default and prepayments and selection of appropriate discount rates. Fair value estimates obtained from models are adjusted for any other factors, such as liquidity risk or model uncertainties, to the extent that the Group believes that a third party market participant would take them into account in pricing a transaction. Fair values reflect the credit risk of the instrument and include adjustments to take account of the credit risk of the Group entity and the counterparty where appropriate.

For level 2 assets, fair value was obtained using a recent market transaction during the year under review. Fair values of unquoted debt securities were derived by interpolating prices of quoted debt securities with similar maturity profile and characteristics. There were no transfer between levels 1 and 2 during the year

10.1. Financial instruments in level 1

The fair value of financial instruments traded in active markets is based on quoted market prices at the balance sheet date. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm’s length basis. The quoted market price used for financial assets held by the group is the current bid price. These instruments are included in Level 1. Instruments included in Level 1 comprise primarily government bonds, corporate bonds, treasury bills and equity investments classified as trading securities or available for sale investments

10.2. Financial instruments in level 2

The fair value of financial instruments that are not traded in an active market are determined by using valuation techniques. These valuation techniques maximise the use of observable market data where it is available and rely as little as possible on entity specific estimates. If all significant inputs required to fair value an instrument are observable, the instrument is included in level 2. If one or more of the significant inputs is not based on observable market data, the instrument is included in Level 3. Specific valuation techniques used to value financial instruments include: (i) Quoted market prices or dealer quotes for similar instruments; (ii) The fair value of forward foreign exchange contracts is determined using forward exchange rates at the balance sheet date, with the resulting value discounted back to present value; (iii) Other techniques, such as discounted cash flow analysis, are used to determine fair value for the remaining financial instruments.

10.3. Financial instruments in level 3

Valuation techniques used to derive Level 3 fair values Level 3 fair values of investments have been generally derived using the adjusted fair value comparison approach. Quoted price per earning or price per book value, enterprise value to EBITDA ratios of comparable entities in a similar industry were obtained and adjusted for key factors to reflect estimated ratios of the investment being valued. Adjusting factors used are the Illiquidity discount which assumes a reduced earning on a private entity in comparison to a publicly quoted entity and the haircut adjustment which assumes a reduced earning for an entity located in Nigeria contributed by lower transaction levels in comparison to an entity in a developed or emerging market.