

**यूनियन बैंक**  
ऑफ इंडिया  
भारत सरकार का उपक्रम



**Union Bank**  
of India

A Government of India Undertaking

# **Disclosure Policy 2023-24**

## **- An Inclusive One**

निवेशक सेवायें प्रभाग, बोर्ड सचिवालय  
Investor Services Division, Board Secretariat  
239, Vidhan Bhavan Marg, Nariman Point, Mumbai - 400 021.



**TABLE OF CONTENTS**

Sr. No.	Particulars	Page No.
--	Abbreviations	1
1.	Preamble	3
2.	Scope of the Disclosure Policy	4
3.	Objectives of the Policy	5
4.	Principles of Disclosure Policy	5
5.	Disclosure Committee	6
6.	Spokespersons	7
7.	Quiet period	8
8.	Responding to Market Rumours	8
9.	Disclosures Requirements	8
10.	Materiality Concept	20
11.	Internal Control over Disclosure Process	22
12.	Reporting System for disclosures	23
13.	Review of Policy	24
--	Annexures to the Policy	25
Annexure-I	Reserve Bank of India's (RBI) Directives on Disclosure	26
Annexure-II	Disclosure requirements as per guidelines for implementation of the New Capital Adequacy Framework Pillar - 3 Disclosure Requirements	33
Annexure-III	Securities and Exchange Board of India's (SEBI) Directives on Disclosure	50
Annexure-IV	Disclosure requirement for divergence in assets classification and provisioning	54
Annexure-V	Summary Information on complaints received by the Bank from customers & from the OBOs	55
Annexure-V-A	Top five grounds of complaints received by the bank from customers	56
	Appendix I	57
Annexure-VI	Unauthorised Disclosure Report	58
Annexure-VII	Disclosures Reports	59
--	References	60

S.H.S.





## ABBREVIATIONS

AGM	Assistant General Manager
ALM	Asset liabilities Management
AS	Account Standards
ATM	Automated Teller Machine
BRSR	Business Responsibility and Sustainability Report
BSE	BSE Ltd.
CA&ID	Central Audit and Inspection Department
CCR	Counterparty Credit Risk
CDR	Corporate Debt Restructuring
COO	Chief Operating Officer
CFO	Chief Financial Officer
CCO	Chief Compliance Officer
CRAR	Capital to Risk weighted Assets Ratio
CRD	Credit Recovery Department
CUSIP	Committee on Uniform Security Identification Procedures
DEAF	Depositor Education and Awareness Fund Scheme
DF	Disclosure Format
DIT	Department of Information Technology
DGM	Deputy General Manager
ED	Executive Director
GM	General Manager
CGM	Chief General Manager
HTM	Held-To-Maturity
IBA	Indian Banks' Association
ICAAP	Internal Capital Adequacy Assessment Process
ICAI	Institute of Chartered Accounts of India
IndAS	Indian Accounting Standards
IRRBB	Interest Rate Risk in the Banking Book
ISIN	International Securities Identification Number
LCR	Liquidity Coverage Ratio
MD&CEO	Managing Director and Chief Executive Officer
MSME	Micro, Small and Medium Enterprises
NCAF	New Capital Adequacy Framework
NPA	Non Performing Assets
NSE	National Stock Exchange of India Ltd.





OBO	Office of Banking Ombudsman
RBI	Reserve Bank of India
RMD	Risk Management Department
SEBI	Securities and Exchange Board of India
SLR	Statutory Liquidity Ratio
MSME	Micro & Small Medium Enterprises
UFCE	Un-hedged Foreign Currency Exposure
UPSI	Unpublished Price Sensitive Information
WG	Working Group

SK.



## DISCLOSURE POLICY

### 1. PREAMBLE:

- 1.1. The users of financial statements need information about the financial position and performance of the Bank in making economic decisions. They are interested in its liquidity, solvency and risks related to assets & liabilities recognized both on balance sheet and off balance sheet items. Hence there is a need for effective disclosure.
- 1.2. With the progressive de-regulation, cross border dealings, introduction of wide-range of products / services, improvement in technology and communication, significant changes have occurred in the operating environment as well as Balance sheets of the Bank. To respond to the challenges, the Reserve Bank of India (RBI) has taken initiatives to induce better operating standards in Banks, greater transparency and sensitivity towards risk management by Banks.
- 1.3. RBI has endorsed implementation of BASEL-III Accord in a phased manner and has directed banks to comply with basic approaches for measurement of Credit Risk, Operational Risk and Market Risk. Also, to initiate concurrently required steps for complying with the minimum requirement and strengthening of the internal controls and Risk Management practices to move over to advanced approaches.
- 1.4. New Accord is based on three mutually reinforcing pillars viz. (i) minimum capital requirements, (ii) supervisory review of capital adequacy and (iii) market discipline that allow Banks and Supervisors to evaluate properly the various risks that banks face and realign regulatory capital more closely with the underlying risks.
- 1.5. Market Discipline has been given due importance under Basel III by recognizing it as one of its three Pillars.
- 1.6. Pillar - 3 of the New Capital Accord through Market Discipline provides incentives to bank to conduct business in a safe, sound and efficient manner, including incentives to maintain a strong capital base as a cushion against potential future losses arising from risk exposures. This is on the firm belief that market discipline supplements to address regulatory concerns. The discipline imposed by the markets can be as powerful as the sanctions imposed by the regulator.
- 1.7. For implementing Pillar-3, there are certain prescribed requirements on Disclosure.
- 1.8. RBI requires banks to make disclosures in order to enhance market discipline. As per RBI Master Circular on Basel III Regulations, Banks should have a formal disclosure policy approved by the Board of directors that addresses the bank's approach for determining what disclosures it will make and the internal controls over the disclosure process. In addition, banks should implement a





process for assessing the appropriateness of their disclosures, including validation and frequency.

- 1.9. Presently, disclosures in annual financial statements are guided by (i) Schedule - II of Section 29 of Banking Regulation Act - 1949, (ii) RBI Guidelines issued from time to time, (iii) Securities and Exchange Board of India (SEBI) (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”) in case of listed Banks, (iv) Accounting Standards & Guidelines issued by Institute of Chartered Accountants of India (ICAI) etc. Further as per Listing Regulations, Bank also gives information by way of Directors’ Report and Management Discussion and Analysis Report about the Bank’s overall performance, its business strategies, its services, products, Risk Management, etc. in its Annual Report every year as a matter of good governance through proper disclosure.
- 1.10. The Bank is listed with the National Stock Exchange of India Ltd. and BSE Ltd. and disclosures required for listed entities are being complied with.
- 1.11. The disclosure requirements are more demanding for the advanced approaches. As of now, the disclosures, sought by Reserve Bank of India are for the basic approaches i.e. Standardized Approach for Credit Risk, Basic Indicator Approach for Operational Risk and Standardised Measurement Approach for Market Risk.
- 1.12. The disclosure requirements in terms of appropriateness of disclosure, means of disclosure, frequency of disclosure, etc. are described in the subsequent paragraphs.
- 1.13. RBI / SEBI may consider imposing penalty, including financial penalty, for banks not meeting the prescribed disclosure requirements.
- 1.14. A maiden disclosure policy was formulated in 2006 based on RBI guidelines and also as a part of implementation of New Capital Adequacy Framework (NCAF) - Parallel run. Subsequently, it was revised every year based on RBI’s NCAF guidelines with subsequent amendments and model disclosure policy of Indian Banks’ Association (IBA). In response to the financial crisis, Basel Committee issued certain enhancements to the Basel Framework wherein certain additional disclosure requirements were prescribed under Pillar 3.

## 2. SCOPE OF THE DISCLOSURE POLICY

- 2.1 The Disclosure Policy covers all mandatory qualitative and quantitative disclosures in respect of regulatory requirements.
- 2.2 The Qualitative Disclosures provide a general summary of a bank’s risk management objectives and policies, reporting system and definitions, etc. whereas the quantitative disclosures cover the important financial parameters in terms of amount, ratios, its business growth, achievement and capital requirements for various risks etc.

8





- 2.3 This policy is applicable to the Bank i.e. Union Bank of India. Whereas, subsidiaries and foreign branches of the Bank will be governed by disclosure rules framed by the concern Subsidiary Company and the local regulator in the foreign country respectively.

### 3. OBJECTIVES OF THE POLICY:

This Disclosure Policy aims

- 3.1. To strengthen market discipline that would contribute to a safe and sound banking environment.
- 3.2. To allow market participants i.e. investors / depositors / other stakeholders to assess and measure the important information on the various aspects such as capital, risk exposures, risk assessment processes, systems and best practices to take decisions for investment, banking, etc.
- 3.3. To instil confidence in the stakeholders, shareholders, customers, and the public in general.
- 3.4. To enhance transparency that would facilitate more effective supervision and promote emergence of sound banking system.
- 3.5. To ensure that there is appropriate oversight by Senior Management over the disclosures.
- 3.6. To mitigate the moral hazards and excessive risk taking.
- 3.7. To enhance Bank's efficiency.
- 3.8. To reduce the social cost of supervision and regulation.
- 3.9. To facilitate compliance with applicable laws.
- 3.10. To have a Disclosure Committee of Executives of the Bank to help achieve the above objectives.

### 4. PRINCIPLES OF DISCLOSURE POLICY:

- 4.1. Bank is committed to provide timely and accurate disclosure of all material information on the activities of the Bank. Information would be regarded as material if its omission or misstatement could change or influence the assessment or decision of a user relying on that information for the purpose of making economic decisions. This definition is consistent with International Accounting Standards and with the national accounting framework. Further, material information means any information relating to the business and affairs of the Bank that results in or would reasonably be expected to result in a significant change in the market price or value of any of the Bank's securities.
- 4.2. Disclosure would include any information, omission of which would make the rest of the disclosure misleading.

*[Handwritten signature]*





- 4.3. The Bank shall disclose Material Information in the public domain with exceptions in circumstances where regulation allows the maintenance of confidentiality for a period of time and regulatory filings on a confidential basis.
- 4.4. The corporate website would be used to enhance dissemination of information.
- 4.5. Disclosure Policy applies to all means of communication to the public, inclusive of oral, written or electronic communications.
- 4.6. This policy shall cover oral statements made by the spokespersons in group or individual meetings and telephone conversations with the members of investment community (which include analysts, investors, investment advisors, etc) and interview with media as well as news conference and web casts.
- 4.7. Disclosure shall also include all written materials and oral statements publicly made by any / all spokesperson/s of the bank.

## 5. DISCLOSURE COMMITTEE:

### 5.1. Composition:

5.1.1 The Disclosure Committee of the Executives of the Bank will consist of senior officials of the Bank. The following members shall constitute the Bank's Disclosure Committee;

- Managing Director & Chief Executive Officer (MD&CEO);
- Executive Director/s (EDs);
- **Chief General Manager - Operations (COO)**
- Chief Risk Officer;
- Board Secretary & or Company Secretary
- Chief Financial Officer;
- Chief Compliance Officer;
- **Chief Digital Officer;**
- **Chief Law Officer.**

**Chairman of the Disclosure Committee:** - The meeting shall be chaired by the Managing Director and Chief Executive Officer (MD & CEO). In absence of MD & CEO, senior most Executive Director (among EDs present in the meeting) shall chair the Committee.

5.1.2 **Quorum:** The quorum for the meeting should be of 4 members which includes Chairman of the Disclosure Committee i.e. MD & CEO/ED as the case may be.

5.1.3 Board Secretary shall be the convener of the meeting. Disclosure Committee will meet as and when required.

5/11/24





5.1.4 Disclosure Committee may induct as invitees such persons as may be considered fit and necessary.

## 5.2. Functions:

5.2.1 The Committee shall determine which / when events, developments, changes or other facts constitute “material information” or a material change in the affairs of the Bank. In making such determination, the Committee will assess the impact of any such event, development pertaining to or change in.

- The assets, liabilities and earnings of the Bank at quarterly intervals and also on consolidated annual basis,.
- The reputation or overall operations of the Bank.
- The strategic direction of the Bank.
- The market price or value of any group of the Bank's securities/investments.

5.2.2 The committee shall review annually disclosure practices and procedures for effectiveness and possible changes.

5.2.3 The committee shall select / confirm officers / authorities / individuals responsible for preparation of / and filings of returns other than the returns which are already included in the policy.

5.2.4 The committee shall review risk factors and forward-looking statement language in reports and review for updating requirements

5.2.5 The committee shall determine / review policies and procedures for briefings to the print / electronic media, analysts, institutional investors, customers or any other group.

5.2.6 The committee shall review policy / framework on trading restrictions and 'quiet periods'.

5.2.7 The committee shall review analysts' reports / large investor presentations and determine appropriate response.

5.2.8 The committee shall take any and all steps necessary to comply with Disclosure requirements.

5.2.9 The committee shall evaluate the positioning / management of 'Reputational Risk' through Disclosures or otherwise.

## 6. SPOKESPERSONS:

6.1. The Bank shall designate limited number of spokespersons responsible for communication with the media, investors and analysts. The spokespersons are

55





Managing Director & Chief Executive Officer and any of the Executive Director(s). The Chief General Manager / General Manager holding charge of Corporate Communications or any other person authorized by MD & CEO is the 'General Spokesperson' of the bank.

- 6.2. Operational guidelines / practices for spokespersons shall be in line with that of the Corporate Communication Policy of the Bank.

#### 7. QUIET PERIOD:

To obviate any rumour / speculation, the Bank observes a 'Quiet period'. This is a period of two weeks / fourteen days in advance to the date of publication of financial results. During the quiet period, spokespersons will not initiate any meetings with analysts, investors or media and will refrain from discussing matters related to earnings and financial performance.

#### 8. RESPONDING TO MARKET RUMOURS:

- 8.1. It will be the Bank's general practice not to comment on market rumours or speculation where it is clear that it is not based on information from the Bank. Investor's Relation Department shall directly monitor the various websites in order to identify statements being made about the Bank, with a view to identify the source of a market rumour. After consultation with the Disclosure Committee, the Bank's spokespersons may respond in tone and tenor determined by the Disclosure Committee to protect the bank's Reputation. Any statement of denial, repudiation etc., must be carefully worded and as far as possible cleared by the Disclosure Committee.
- 8.2. However, in case of emergency, MD & CEO and / or any of the ED(s) shall be empowered to react to adverse market reports.

#### 9. DISCLOSURE REQUIREMENTS (INCLUSIVE LIST):

##### 9.1. Disclosures under SEBI Regulations:

##### 9.1.1. a. Disclosures under SEBI Listing Regulations:

Sr.	Particulars of Disclosure to Stock Exchanges	Periodicity
1	Regulation 13(3): Statement of Investor complaints	Quarterly
2	Regulation 23(9): Related Party Transactions in the format as specified by the SEBI.	Half-yearly
3	Regulation 24A (2): Secretarial Compliance Report in the format as specified by the SEBI.	Yearly
3	Regulation 27(2): Corporate Governance Report in the format as specified by the SEBI.	Quarterly
4	Regulation 29(1) / 50(1) : Prior intimation for Board meeting for considering the fund raising / financial results etc.,	Event based
5	Regulation 30 read with Part A of Schedule III: Events as specified in Schedule III of SEBI Listing Regulations	Event based

११





6	Regulation 31(1)(b): Shareholding pattern in the format as specified by the SEBI.	Quarterly and at the time of listing new securities
7	Regulation 32(1) / (2) / 52(7): Statement of deviation or variation in the use of proceeds in the format as specified by the SEBI.	Quarterly
8	Regulations 33 and 52 read with Part A of Schedule IV: Financial Results in the format as specified by the SEBI. @	Quarterly / Yearly
9	Regulation 40(10): Certificate from Practicing Company Secretary that certificates have been issued within thirty days of the date of lodgement for transfer, sub division, consolidation, renewal, exchange or endorsement of calls/allotment monies	Yearly
10	Regulation 42: Intimation of Record Date for dividend / rights issue / bonus issue etc.,	Event based
11	Regulation 46(2): Disclosure of information as specified in Reg.46(2) on the website of the Bank.	Event based
12	Regulation 47(1)(b) / (d): Publication in Newspapers of Financial Results and notice to shareholders by Advertisement	Event based
13	Regulation 51 read with Part B of Schedule III: Disclosure of information having a bearing on performance / operation of the Bank and / or price sensitive information	Event based
14	Regulation 54: Security Cover in respect of listed secured non-convertible debt securities in the format as specified by the SEBI.	Quarterly / Half-yearly Yearly
15	Regulation 57(1): Certificate to the stock exchange within one working day of the interest or dividend or principal becoming due regarding status of payment in case of non-convertible securities in the format as specified by the SEBI.	Event based
16	Regulation 57(4): Details for all the non-convertible securities for which interest/dividend/principal obligations shall be payable during the upcoming quarter in the format as specified by the SEBI.	Quarterly
17	Regulation 57(5): a certificate confirming the payment of interest/dividend/principal obligations for non-convertible securities which were due in the preceding quarter in the format as specified by the SEBI.	Quarterly
18	Regulation 60(2): Disclosure of Record Date fixed for the purposes of interest payment and redemption	Event based

@ In terms of SEBI circular CIR/CFD/CMD-1/142/2018 dated 19<sup>th</sup> November 2018 , if any listed entity does not submit its financial results in accordance with the timelines specified in Regulation 33 of Listing Regulations, the listed entity shall disclose detailed reasons for such delay to the stock exchanges within one working day of the due date of submission for the results as required under Regulation 33. However, if the decision to delay the results was taken by the listed entity prior to the due date, the listed entity shall disclose detailed reasons for such delay to the stock exchanges within one working day of such decision.

शुभ  
२





## Categories of Disclosure of Events/Information as per Regulation 30 of the SEBI Listing Regulations:

The Events/Information that are required to be disclosed by the Bank may be divided in the following categories:

- i. Events to be disclosed without application of the guidelines for determining materiality, as specified in Para A of Part A Schedule III of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated September 9, 2015
- ii. Events to be disclosed upon application of the guidelines for determining materiality, as specified in Para B of Part A of Schedule III of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD/4/2015 dated September 9, 2015
- iii. Any other events or information viz. major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the Bank which may be necessary to enable the holders of securities of the Bank to appraise its position and to avoid the establishment of a false market in such securities.
- iv. Without prejudice to the generality of the Clause i, ii & iii above; Events/Information specified by the SEBI from time to time.
- v. All events or information with respect to subsidiaries which are material for the Bank.
- vi. The Bank shall promptly inform the stock exchange(s) of all information having bearing on the performance/operation of the Bank, price sensitive information or any action that shall affect payment of interest or dividend of non-convertible preference shares or redemption of non-convertible debt securities or redeemable preference shares.

Explanation.- The expression 'promptly inform', shall imply that the stock exchange must be informed as soon as practically possible and without any delay and that the information shall be given first to the stock exchange(s) before providing the same to any third party.

- vii. If the Bank has issued or is Issuing non-convertible securities then the bank shall make disclosures as specified in Part B of Schedule III of the Listing Regulations.

Further, the Bank shall provide specific and adequate reply to all queries raised by Stock Exchange(s) with respect to any events or information.

The Bank may on its own initiative also confirm or deny any reported event or information to Stock Exchange(s).

5/11/23





b. *Disclosures to Debenture Trustees under Regulation 56 of SEBI Listing Regulations:*

- Annual Report
- Revision in the rating
- Security Cover as mentioned under Regulation 54
- Disclosure of information having a bearing on performance / operation of the Bank and / or price sensitive information under Regulation 51
- Such other information as sought by the Trustees

c. *Disclosures in Annual Report under SEBI Listing Regulations:*

- Compliance certificate by CEO and CFO under Reg.17(8)
- Secretarial Audit Report as submitted by the Secretarial Auditor
- Disclosures as specified in Regulations 34 and 53 of the Listing Regulations read with Schedule V which include (apart from Notice of Annual General Meeting and Financials) *inter-alia*:
  - *Directors' report*
  - *Management Discussion and Analysis*
  - *Business Responsibility and Sustainability Report*
  - *Corporate Governance Report*
  - *Related Party Disclosures*

The bank has overseas office; hence bank will provide disclosures on the international operations briefly under Management Discussion & Analysis in the Annual Report. The bank shall comply with the disclosure requirements as per the respective country's regulatory authority.

- d. Apart from the above, Disclosures are also required on the website of the Bank as specified under Regulations 46 and 62 of SEBI Listing Regulations.
- e. The financial results of the bank, the press releases issued by the Bank, presentations made to analysts, shareholding pattern, etc. shall be displayed on the Bank's website as per Listing Regulations.
- f. All disclosures made to BSE/NSE will also be placed on the Bank's corporate website after it is sent to the concerned authority and will be retained there for at least 5 years and thereafter as per the website archival policy of the Bank.
- g. The bank shall declare the financial results quarterly, half yearly and yearly basis and it shall be published in two or more newspapers including at least one English language national daily newspaper circulating in the whole or substantially the whole of India and local daily paper in Maharashtra where the Head Office of the Bank is located.





9.1.2. Disclosures under SEBI (Prohibition of Insider Trading) Regulations:

- a. Particulars of Trading by the immediate relative of every Promoter/member of the Promoter group / Director / Designated person of the Bank shall disclose to the Bank in Form 8 of the Bank's Code of Conduct in this regard, the number of such securities acquired or disposed of **within two trading days** of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of **Rs.10,00,000 (Rupees Ten Lakhs)**.
- b. The Bank's Code of Conduct for Prohibition of Trading by Insiders and Fair Disclosure of UPSI and any amendments thereto shall be made available on the website of the Bank and shall also be disclosed to the Stock Exchanges.
- c. Closure of Trading Window.
- d. The Bank / Compliance Officer shall also promptly inform all violations of SEBI Regulations in this regard observed by them to Stock Exchanges where the shares of the Bank are traded and also to SEBI, in such form and manner as may be specified by the SEBI from time to time.

9.1.3. Disclosures under SEBI (Substantial Acquisition of Shares and Takeover) Regulations:

- a. Details of acquisition by the Bank aggregating to Five percent or more of the voting rights in a Target Company under Regulation 29(1) read with Regulation 29(4) of **SEBI (Substantial Acquisition of Shares and Takeover) Regulations** to be disclosed to the Target Company and Stock exchanges where the shares of the Target Company are listed.
- b. Any change in the shareholding of the Bank in the Target Company from the last disclosure made under Reg.29(1) and such change exceeds two per cent of total shareholding or voting rights in the target company to be disclosed under Regulation 29(2) to be disclosed to the Target Company and Stock exchanges where the shares of the Target Company are listed.
- c. Disclosure to Stock Exchanges under Regulation 31(4) that Promoter of the Bank has not made any encumbrance on the shares of the Bank.

9.1.4. Disclosures under SEBI (Depositories & Participants) Regulations:

- a. Certificate to Depositories and Stock Exchanges regarding de-materialization/re-materialization of shares under Regulation 74(5).
- b. Reconciliation of Share Capital Audit Report submitted by a practicing CA/CS under Regulation 76(1).

9.1.5. Disclosures under SEBI (Issue and Listing of Non-Convertible Securities) Regulations:

- a. Notice of call option to eligible bondholders under Regulation 15; a copy thereof to Stock Exchanges and publication in the Newspapers; Submission of

5





report to Stock Exchanges and Trustees regarding the bonds redeemed by Call option.

- b. The Placement Memorandum issued in respect of Private Placement of Debt Bonds shall contain the disclosures as enunciated under Schedule II of the Regulations.
- c. Such other disclosures / particulars as specified by the Stock Exchanges at the time of filing application for listing of Debt Bonds / Such other information as specified by the SEBI.

**9.1.6. Disclosures under SEBI (Issue of Capital and Disclosure Requirements) Regulations:**

Disclosures in respect of Capital Issues by the Bank shall be in accordance with the relevant Schedules under SEBI (Issue of Capital and Disclosure Requirements) Regulations. For example, Disclosures in respect of Qualified Institutions Placement (QIP) shall be made in the Placement Document in accordance with Schedule VII of the Regulations.

**9.2. Disclosures under Accounting Standards issued by the Institute of Chartered Accountants of India:**

9.2.1. Bank shall also disclose information as per the following Accounting Standards (wherever applicable) where RBI has issued guidelines:

Account Standard	Information pertains to
Accounting Standard 5	Net Profit or Loss for the period, prior period, items and changes in accounting policies
Accounting Standard 9	Revenue Recognition
Accounting Standard 10	Treatment for property, plant and equipment
Accounting Standard 11	Effects of changes in Foreign Exchange Rates
Accounting Standard 15	Employee Benefits
Accounting Standard 17	Segment Reporting @
Accounting Standard 18	Related Party Disclosures
Accounting Standard 19	Leases
Accounting Standard 20	Earnings per share
Accounting Standard 21	Consolidated Financial Statements
Accounting Standard 22	Accounting for Taxes on Income
Accounting Standard 23	Accounting for Investments in Associates in Consolidated Financial Statements
Accounting Standard 24	Discontinuing Operations
Accounting Standard 25	Interim Financial Reporting
Accounting Standard 26	Intangible Assets
Accounting Standard 27	Financial Reporting of Interests in Joint Ventures
Accounting Standard 28	Impairment of Assets
Accounting Standard 29	Contingent Liabilities

2





Besides the above, Bank shall also comply with the Disclosure norms stipulated under the various other Accounting Standards issued by the Institute of Chartered Accountants of India to the extent applicable to Bank.

@ As per RBI guidelines on AS-17 (Segment Reporting) (Vide RBI Circular dated 18.04.2007 as repealed /subsumed by RBI Master Circular on “Disclosure in Financial Statements - Notes to Accounts” and compiled by RBI Master Direction on “Financial Statements - Presentation and Disclosures”), Bank has adopted the following business segments for reporting from March 31, 2008.

- Treasury
- Corporate / Wholesale Banking
- Retail Banking
- Other Banking Business

‘Domestic’ and ‘International’ segments will be the geographic segments for disclosure. Business segment shall be considered as the primary reporting format and geographical segment would be the secondary reporting format. Bank shall use its own methods, on a reasonable and consistent basis, for allocation of expenditure among the segments.

9.2.2. Banks are also required to comply with the Accounting Standard - 1 (AS-1) on Disclosure of Accounting Policies issued by the Institute of Chartered Accountants of India. The enhanced disclosures have been achieved through revision of Balance Sheet and Profit & Loss Account of banks and enlarging the scope of disclosures to be made in ‘Notes to Accounts’.

9.2.3. In terms of RBI Circular RBI/2018-2019/146 - DBR.BP.BC.No.29/21.07.001/2018-19 dated 22<sup>nd</sup> March 2019, Implementation of Indian Accounting Standards (Ind AS) has been deferred till further notice and as such the Banks are not required to disclose / prepare IND AS based financial statements for accounting periods beginning April 2018 onwards. However, Proforma Financials as per Ind AS have to be prepared and submitted to the RBI on quarterly basis.

9.2.4. In addition to the prescribed schedules to the balance sheet, banks are required to disclose the accounting policies regarding key areas of operations at one place under Schedule - 17. A suggestive list includes Basis of Accounting, Transactions involving foreign exchange, Investments - classification, valuation, etc, Advances and Provisions thereon, Fixed Assets and Depreciation, Revenue Recognition, Employee Benefits, Provision for Taxation, Net Profit, etc. Certain additional information also needs to be disclosed under Schedule - 18 in the ‘Notes to Accounts’.

**9.3. Disclosures under Circulars / Guidelines / Master Circulars / Master Directions of Reserve Bank of India (RBI):**

In order to encourage market discipline, Reserve Bank of India has over the years developed a set of disclosure requirements, which allow the market participants to assess key pieces of information on capital adequacy, risk exposures, risk assessment processes and key business parameters, to provide a consistent and understandable disclosure framework that enhances comparability.

१३





With a view to ensure uniformity in and compliance with mandated disclosures, Bank shall adopt the formats prescribed by the RBI for the purpose of all disclosures from time to time.

9.3.1. Disclosures under RBI Master Direction on “Financial Statements - Presentation and Disclosures”:

The following information shall be disclosed in the Notes to Accounts of the Financial Statements in the formats specified by the RBI:

a. **Regulatory Capital**

- Composition of Regulatory Capital
- Draw down from Reserves

b. **Asset Liability Management**

- Maturity pattern of assets and liabilities (like Deposits, borrowings, advances, investments, Foreign currency Assets and Liabilities)
- Liquidity Coverage Ratio (LCR)
- Net Stable Funding Ratio (NSFR)

c. **Investments**

- Composition of Investment portfolio (Held to Maturity, Available for Sale and Held for Trading)
- Movement of provisions for depreciation and Investment Fluctuation Reserve
- Sale and transfers to/from HTM category
- Non-SLR investment portfolio
- Repo transactions in face value terms (as specified in Repurchase Transactions (Reserve Bank) Directions, 2018)

d. **Asset Quality**

- Classification of advances and provisions held
- Sector-wise Advances and Gross NPAs
- Overseas assets, NPAs and revenue
- Particulars of resolution plan and restructuring
- **Divergence in asset classification and provisioning if either or both of the following conditions are satisfied: [Annexure-IV]**
  - i. the additional provisioning for NPAs assessed by Reserve Bank of India as part of its supervisory process, exceeds five per cent of the reported profit before provisions and contingencies for the reference period, and
  - ii. the additional Gross NPAs identified by the Reserve Bank of India as part of its supervisory process exceed five per cent of the reported incremental Gross NPAs for the reference period.

(In terms of SEBI Circular - CIR/CFD/CMD1/120/2019 dated 31<sup>st</sup> October 2019, the Bank shall make disclosures to stock exchanges of divergences and provisioning beyond thresholds as specified above as soon as reasonably possible and not later

8/8/24





than 24 hours upon receipt of RBI's Final Risk Assessment Report (RAR) rather than waiting to publish them as part of annual financial statements.)

- Disclosure of transfer of loan exposures as specified in Reserve Bank of India (Transfer of Loan Exposures) Directions, 2021
- Fraud Accounts
- Disclosure under Resolution Framework for COVID-19-related Stress

**e. Exposures**

- Exposure to real estate sector
- Exposure to Capital Market
- Risk category-wise country exposure
- Unsecured advances
- Factoring exposures
- Intra-group exposures
- Unhedged foreign currency exposure

**f. Concentration of deposits, advances, exposures and NPAs**

**g. Derivatives**

- Forward rate agreement/Interest rate swap
- Exchange traded interest rate derivatives
- Disclosures on risk exposure in derivatives
- Credit default swaps

**h. Disclosures relating to Securitisation** pursuant to Reserve Bank of India (Securitisation of Standard Assets) Directions, 2021

**i. Off balance sheet SPVs sponsored**

**j. Transfers to Depositor Education and Awareness Fund**

**k. Disclosure of complaints (as per RBI Circular RBI/2020-21/87 CEPD.CO.PRD.Cir.No.01/13.01.013/2020-21 dated January 27, 2021 on Strengthening of Grievance Redress Mechanism in Banks) (Annexures V-A & V-B)**

- Summary information on complaints received by the bank from customers and from the Offices of Ombudsman
- Top five grounds of complaints received by the bank from customers

**l. Disclosure of penalties imposed by the Reserve Bank of India**

**m. Disclosures on remuneration to Whole Time Directors**

**n. Other Disclosures**

- Business ratios
- Bancassurance business
- Marketing and distribution
- Disclosures regarding Priority Sector Lending Certificates (PSLCs)
- Provisions and contingencies





- Implementation of IFRS converged Indian Accounting Standards (Ind AS)
- Payment of DICGC Insurance Premium

[Disclosures (both qualitative and quantitative) to be made by the bank in the ‘Notes to Accounts’ are outlined in Annexure - I.]

**9.3.2. Disclosures under RBI Master Circular on “BASEL III - Capital Regulations”:**

- a. The Bank shall comply with the disclosure requirements as per Pillar 3 of RBI’s guidelines on BASEL - III Capital Regulations in the format as specified by the RBI therein. With a view to enhance the ease of access to the Pillar - 3 disclosures, Bank shall make its disclosures both in the website and on the annual report.
- b. Disclosures as per Pillar - 3 requirements shall be put on the Bank’s website in a web page titled “BASEL - III disclosures” and the link to this page will be provided in financial results / statements. Disclosures as per Pillar -3 shall be made concurrent with publication of financial results / statements. Each of this disclosure pertaining to a financial year will be available on the website until disclosure of the third subsequent annual (March end) disclosure is made.
- c. The following are the disclosures to be made as per Pillar 3 Disclosure requirements in the format as specified by the RBI:

Sr.	Pillar - 3 - Disclosure	Periodicity
1	Table DF-1:Scope of Application	Half-yearly
2	Table DF-2:Capital Adequacy	Quarterly
3	Table DF-3:Credit Risk: General Disclosures for All Banks	Quarterly
4	Table DF-4:Credit Risk: Disclosures for Portfolios Subject to the Standardised Approach	Quarterly
5	Table DF-5:Credit Risk Mitigation: Disclosures for Standardised Approaches	Half-yearly
6	Table DF-6:Securitisation Exposures: Disclosure for Standardised Approach	Half-yearly
7	Table DF-7:Market Risk in Trading Book	Half-yearly
8	Table DF-8:Operational Risk	Half-yearly
9	Table DF-9:Interest Rate Risk in the Banking Book (IRRBB)	Half-yearly
10	Table DF-10:General Disclosure for Exposures Related to Counterparty Credit Risk	Half-yearly
11	Table DF-11:Composition of Capital	Half-yearly
12	Table DF-12: Composition of Capital - Reconciliation Requirements	Half-yearly
13	Table DF-13:Main Features of Regulatory Capital Instruments	Half-yearly
14	Table DF-14:Full Terms and Conditions of Regulatory Capital Instruments	Half-yearly
15	Table DF-16 :Equities - Disclosure for Banking Book Positions	Half-yearly

- d. With the exception of the mandatory quarterly frequency requirement in paragraph c above, detailed disclosures required as mentioned below, shall be made by Bank, irrespective of whether statements are audited, at least on a half yearly basis (i.e. as on September 30 and March 31 of a financial year), along with other Pillar 3 as required in terms of Master Circular on Basel III Capital Regulations:

४४





Sr.	Leverage Ratio Disclosure	Periodicity
1	Table DF-17 - Summary comparison of accounting assets vs. leverage ratio exposure measure	Half-yearly
2	Table DF-18 - Leverage ratio common disclosure template	Half-yearly

- e. The leverage ratio shall be disclosed in DF-17 and DF-18 as stipulated for Pillar 3 disclosures of the Bank. The same shall be published in financial results / statements and Bank's website. However, specific to leverage ratio disclosures, Bank shall make available on their website, an ongoing archive of all reconciliation templates, disclosure templates and explanatory tables to prior reporting periods, instead of an archive for at least three years required in case of Pillar 3 disclosures.
- f. The Pillar 3 disclosure requirement is applicable to the Leverage Ratio. Therefore, Bank, at a minimum, shall disclose the following three items on a quarter-end basis (i.e. as on June 30, September 30, December 31 and March 31 of a financial year) along with the figures of the prior three quarter-ends, irrespective of whether financial statements are audited:
- (i) Tier 1 capital
  - (ii) Exposure measure
  - (iii) Leverage ratio
- g. Bank shall also make interim disclosures on the quantitative aspects, on standalone basis on its website as at end September each year in addition to annual quantitative disclosures as at end of March. Qualitative Disclosures shall be published only on an annual basis.
- h. Bank shall disclose its Tier I Capital, Total Capital, Total Required Capital, Tier I ratio and total capital adequacy ratio on a quarterly basis in its website.
- i. In terms of RBI guideline, Bank shall disclose the amount of Priority Sector Lending Certificates (PSLC) (category-wise), sold and purchased during the year in the 'Disclosures to the Balance Sheet'.
- j. In terms of RBI guidelines, disclosures are to be made in either or both of the cases (a) The additional provisioning requirements for NPAs assessed by RBI exceed 10 percent of the reported profits before provisions and contingencies for the reference period or (b) The additional Gross NPA identified by RBI exceed 15 percent of the published incremental Gross NPA for the period. Such disclosures should be made in the Notes to Accounts in the ensuing Annual Financial Statements published immediately following communication of such divergence by RBI to Bank and the same should be reported as per RBI prescribed format (as per Annexure - IV) or amended format, if any.
- k. Reconciliation Requirements:**
- Banks will be required to disclose a full reconciliation of all regulatory capital elements back to the balance sheet in the audited (or unaudited) financial statements. This requirement aims to address disconnect, if any, present in a bank's disclosure between the numbers used for the calculation of regulatory capital and the numbers used in the balance sheet.





- Banks will have to follow a three-step approach to show the link between their balance sheet and the numbers which are used in the composition of capital disclosure template set out in Annex 18 (Table DF-11 whichever applicable).

The three steps are explained below:

Step 1: Banks are required to disclose the reported balance sheet under the regulatory scope of consolidation (Table DF-12 of RBI Master Circular);

Step 2: Banks will have to expand the lines of the balance sheet under regulatory scope of consolidation (Table DF-12 of RBI Master Circular) to display all components which are used in the composition of capital disclosure template (Table DF-11 of RBI Master Circular); and

Step 3: Finally, Banks will have to map each of the components that are disclosed in Step 2 to the composition of capital disclosure template set out in Table DF-11 of RBI Master Circular whichever, applicable.

[The disclosure requirements as per RBI’s BASEL - III Capital Regulations are detailed in Annexure - II.]

**9.4 Disclosures under Insurance Regulatory and Development Authority of India (Registration of Corporate Agents) Regulations, 2015:**

The Bank, being a Corporate Agent, shall make following disclosures to IRDAI:

9.4.1. Any change in material facts, based on which a registration was made, within a reasonable time but not later than 30 days from the happening of such change. The Authority upon receipt of such information, may seek any clarification or issue such directions as it deems fit.

9.4.2. Proceedings initiated against the Bank by other regulatory or Government bodies within a reasonable time but not later than 30 days from the initiation of such proceedings. Any action or direction issued by such other bodies shall also be disclosed to the Authority within the time limits prescribed above.

9.4.3. The details of its offices in which the Bank proposes to distribute insurance products and details of Specified Persons along with their certificate number issued by the Authority. Further, any opening or closure of an office by the Bank shall be informed to the Authority. The Authority may seek further information as it deems appropriate.

9.4.4. Returns / Reports to be submitted by Bank to IRDAI:

S. No	Report Description / Reference(s)	Frequency
1	Schedule VIA Certificate by Insurer (Details of payments made to the Corporate Agent)	Yearly

5





2	Schedule VIB Certificate by Corporate Agent (Details of payments to Corporate Agent)	Yearly
3	Schedule VIII Certificate on No forced Selling by Corporate Agent	Half Yearly
4	New Business (Life and Health)	Half Yearly
5	New Business (General Insurance)	Half Yearly
6	Specified Persons Statement for mobilization of 300 & more policies	Half Yearly
7	Specified Persons summary	Half Yearly
8	Complaints Register	Half Yearly

### 10. Materiality Concept:

- 10.1. 'Material Information' in layman terms, is any information, which if revealed to public, is likely to change a security's perceived value. This means that if the event in question has not yet happened, and it remains unclear whether it may happen at all, then determining whether it is material will require assessing the surrounding circumstances and weighing the probability of the event actually occurring, against the significance to the Bank as a whole.
- 10.2. Events or information shall be disclosed on the basis of their materiality. Any event or information is said to be material if the significance of an omission or misstatement of information that, in the light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would have been changed or influenced by the omission or misstatement.
- 10.3. As regards all information other than mandated disclosure information, the bank shall not disclose any such information, which adversely affects the business performance, reputation of the bank and/or influence the competitor to take advantage directly or indirectly out of such information.

It shall be the sole prerogative of the Bank to decide which disclosures are relevant for it based on the materiality concept.

### 10.4. Guidelines for Determining Materiality of an Event/Information under Regulation 30(4) of the SEBI Listing Regulations:

The Bank shall consider the following criteria for determination of materiality of events or information:

#### Qualitative Criteria:

- (i) the omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly;

8





OR

- (ii) the omission of an event or information is likely to result in significant market reaction if the said omission came to light at a later date;

Where both the criteria specified above are not applicable, an event/information may be treated as being material if in the opinion of the authorised Key Managerial Personnel/s of the Bank, the event / information is considered material based on the criteria mentioned as under:

**Quantitative Criteria:**

An event or information shall be considered material where the value involved or the impact of an event exceeds 1% of the consolidated income of the Bank as per the last audited financial statements or exceeds 2% of the consolidated net worth of the Bank as per the last audited financial statements, whichever is lower.

**10.5. Criteria for Determining Materiality of an Event When an Event/Information has Occurred:**

- a. In certain instances, it would depend upon the stage of discussion, negotiation or approval. In that case, the events/information can be said to have occurred upon receipt of approval of the Board and/or upon the receipt of approval of both the Board and the Shareholders.

However, for events where the price sensitivity factor is involved: e.g. - decision on declaration of dividends etc., the disclosure shall be made on receipt of approval of the event by the Board of Directors, pending Shareholders' approval.

- b. In certain instances, where no such discussion, negotiation or approval is involved, the event/information can be said to have occurred when a Bank becomes aware of the event/information, or as soon as, an officer of the entity has, or ought to have reasonably come into possession of the information in the course of the performance of the duties.

**10.6. Persons Authorised for Determining the Materiality under Para B of Part A of Schedule III of the Listing Regulations:**

Chief Compliance Officer and Chief Financial Officer are jointly or severally authorised to determine materiality of an event/information. Name & Contact details of such authorized personnel shall be disclosed to the stock exchange(s) and also to be made available on Bank's website.

5



**10.6.1. Persons Authorised for Making Disclosures to Stock Exchange(s):**

**Company Secretary** and **Board Secretary** are jointly or severally authorised to make disclosures to stock exchange(s) under the Listing Regulations. Name & Contact details of such authorized personnel shall be disclosed to the stock exchange(s) and also to be made available on Bank's website.

10.7. The following members shall be responsible to disclose, and co-ordinate disclosures pertaining to the following and also report feedback thereon to the Disclosure Committee regularly:

Sr.	Department	Disclosure
1	Chief Financial Officer	Quantitative & Qualitative (pertains to their functional area) Disclosures
2	Chief General Manager / General Manager (Corp. Comm. Department)	Qualitative Disclosures
3	Chief Risk Officer	Disclosures concerning Risk aspects

10.7.1. If information on risk exposure or other items is prone to rapid change, then the bank will publish material information as soon as practicable.

**10.8. Maintenance of Secrecy and Confidentiality - Information on customers:**

10.8.1. The Bank shall maintain secrecy on the transactions of its customer (excepting cases where such information is required to be given by the law, Court attachment, Garnishee Order, Income Tax Authorities etc.), in order to safeguard the proprietary & confidential information.

10.8.2. The Bank shall, at all times, try and strike an appropriate balance between the need for meaningful disclosure and the protection of proprietary and confidential information.

**11. INTERNAL CONTROL OVER THE DISCLOSURES PROCESS:**

11.1. Validation:

11.1.1. The information required for disclosure, shall be provided by the respective departments in Central Office. The respective departments shall have ownership of the information related to their department. They should verify the correctness and genuineness of such information furnished for disclosure. The above disclosures as far as possible shall be subjected to adequate validation through the Statutory Auditors.

11.1.2. Supplementary material like Management's Discussion and Analysis that is published shall also be subjected to sufficient scrutiny (e.g. internal control assessments by Disclosure Committee) to satisfy the validation issue.

11.1.3. Pillar 3 disclosures are not required to be audited by an external auditor, unless specified.

Handwritten initials/signature





#### 11.1.4. Procedure for Disclosure to Stock Exchanges:

In order to ensure that the Bank complies with the disclosure obligations under Regulations 30 of the Listing Regulations, an internal system to determine the materiality of an event or information is made.

Under the system, All Vertical Heads who are responsible for relevant areas of the Bank's operations must report **immediately** either to the Chief Compliance Officer or Chief Financial Officer about occurrence of any event or information which in his opinion may require disclosure.

On receipt of communication of such event or information, the matter will be reviewed and assessed in regard to its accuracy and materiality of such event or information in terms of this policy. Where the Bank is not certain about materiality of event/information, it may refer the matter for the external legal advice **expeditiously**.

Once it is decided by the Chief Compliance Officer or Chief Financial Officer that the event/information is material and requires disclosure, the following **procedure is to be followed for disclosure of the event / information**:

- i. **Prepare draft announcement to the Stock Exchanges:** The Chief Compliance Officer and/or Chief Financial Officer on the basis of inputs received from respective Vertical Head will prepare draft announcement to be disclosed to the Stock Exchanges which is factual and expressed in clear manner.
- ii. **Lodge Announcements:** The Company Secretary and/or Board Secretary on behalf of the Bank will lodge or arrange for disclosure of the announcement as provided by the authorised Key Managerial Personnel to the concerned Stock Exchange(s).
- iii. **Post announcement on website:** After disclosure of the announcement, the Company Secretary and/or Board Secretary will arrange to place it on the website of the Bank. All the announcements in this regard shall be kept on the website as per the Archival Policy of the Bank.

#### 12. Reporting System for disclosures made by Authorised Persons:

12.1. Disclosures made regarding information available in public domain/published information shall not form part of reporting.

12.2. This policy shall cover oral statements made by the spokespersons in group or individual meetings and telephone conversations with the members of investment community (which include analysts, investors, investment advisors, etc) and interview with media as well as news conference and web casts.

Handwritten initials/signature





- 12.3. Disclosure shall also include all written materials and oral statements publicly made by any / all spokesperson/s of the bank.
- 12.4. The bank has overseas office; hence bank will provide disclosures on the international operations briefly under Management Discussion & Analysis in the Annual Report. The bank shall comply with the disclosure requirements as per the respective country's regulatory authority.
- 12.5. Disclosures made by employee/s other than authorized spokespersons and/or unauthorized disclosures noticed shall be reported by any employee of the bank with valid documentary evidence in the prescribed format (Annexure - VI) to the General Manager (Corporate Communications).
- 12.6. Functional departments at Central Office shall confirm to the Chief General Manager / General Manager (Corporate Communications) to the effect that all regulatory/statutory guidelines on disclosure requirements (including adherence to the prescribed formats) are complied with.
- 12.7. The Chief General Manager / General Manager (Corporate Communications) shall report to the Disclosure Committee and also to the Board on the disclosures made in the format (Annexure - VII) with a comprehensive note at quarterly intervals.
- 12.8. The functional departments at Central Office shall continue to provide adequate information both quantitative and qualitative to the Chief Financial Officer concerning the financial statements.
- 13. Any other disclosure has to be made by the Bank as required in compliance with guidelines/directions of Govt. of India/Reserve Bank of India/SEBI/IRDAI or any other authority from time to time.

**14. REVIEW OF POLICY:**

- 14.1. Disclosure Policy shall be reviewed in tune with the regulatory guidelines / internal requirements, experience gained, positioning/management of 'Reputational Risk', and competitors' policies/ methodologies etc., on an annual basis.
- 14.2. The policy shall be valid for the financial year 2023-24 i.e. from 1<sup>st</sup> April 2023 to 31<sup>st</sup> March 2024 and its continuity may be extended for a further period not exceeding 3 months with the specific approval of the Managing Director and Chief Executive Officer (MD &CEO).

\*\*\*\*\*

*Handwritten signature*





## Annexures to the Policy

Annexure-I	Reserve Bank of India's (RBI) Directives on Disclosure
Annexure-II	Disclosure requirements as per guidelines for implementation of the New Capital Adequacy Framework Pillar - 3 Disclosure Requirements
Annexure-III	Securities and Exchange Board of India's (SEBI) Directives on Disclosure
Annexure-IV	Disclosure requirement for divergence in assets classification and provisioning
Annexure-V	Summary Information on complaints received by the Bank from customers & from the OBOs
Annexure-V-A	Top five grounds of complaints received by the bank from customers
Annexure-VI	Unauthorised Disclosures Report
Annexure-VII	Disclosures Reports by Chief General Manager / General Manager (Corporate Communications)

Handwritten signature/initials





## RESERVE BANK OF INDIA'S DIRECTIVES ON DISCLOSURE

S.No	List of Disclosure Items	To be included in	Responsibility
<b>1.Regulatory Capital</b>			
a) Composition of Regulatory Capital			
i	Common Equity Tier 1 capital (CET 1) / Paid up share capital and reserves (net of deductions, if any)	Schedule 18 - Notes on Accounts of Annual Report	CFO
ii	Additional Tier 1 capital/ Other Tier 1 capital	Schedule 18 - Notes on Accounts of Annual Report	CFO
iii	Tier 1 capital (i + ii)	Schedule 18 - Notes on Accounts of Annual Report	CFO
iv	Tier 2 capital	Schedule 18 - Notes on Accounts of Annual Report	CFO
v	Total capital (Tier 1+Tier 2)	Schedule 18 - Notes on Accounts of Annual Report	CFO
vi	Total Risk Weighted Assets (RWAs)	Schedule 18 - Notes on Accounts of Annual Report	CFO
vii	CET 1 Ratio (CET 1 as a percentage of RWAs) / Paid-up share capital and reserves as percentage of RWAs	Schedule 18- Notes to accounts	CFO
viii	Tier 1 Ratio (Tier 1 capital as a percentage of RWAs)	Schedule 18 - Notes on Accounts of Annual Report	CFO
ix	Tier 2 Ratio (Tier 2 capital as a percentage of RWAs)	Schedule 18 - Notes on Accounts of Annual Report	CFO
x	Capital to Risk Weighted Assets Ratio (CRAR) (Total Capital as a percentage of RWAs)	Schedule 18 - Notes on Accounts of Annual Report	CFO
xi	Leverage Ratio*	Schedule 18 - Notes on Accounts of Annual Report	CRO
xii	Percentage of the shareholding of a) Government of India b) State Government (specify name) c) Sponsor Bank	Schedule 18 - Notes on Accounts of Annual Report	GM Board Secretariat
xiii	Amount of paid-up equity capital raised during the year	Schedule 18 - Notes on Accounts of Annual Report	Strategy / Board Secretariat
xiv	Amount of non-equity Tier 1 capital raised during the year, of which: Give list as per instrument type (perpetual non-cumulative preference shares, perpetual debt	Schedule 18 - Notes on Accounts of Annual Report	Strategy / Board Secretariat





Disclosure Policy – 2023-24

S.No	List of Disclosure Items	To be included in	Responsibility
	instruments, etc.). Commercial banks (excluding RRBs) shall also specify if the instruments are Basel II or Basel III compliant.		
xv	Amount of Tier 2 capital raised during the year, of which Give list as per instrument type (perpetual non-cumulative preference shares, perpetual debt instruments, etc.). Commercial banks (excluding RRBs) shall also specify if the instruments are Basel II or Basel III compliant.	Schedule 18 - Notes on Accounts of Annual Report	Strategy / Board Secretariat
b)	Draw down from Reserves	Schedule 18 - Notes on Accounts of Annual Report	CFO
<b>2. Asset liability management</b>			
i	Maturity pattern of certain items of assets and liabilities	Schedule 18 - Notes on Accounts of Annual Report	CRO
ii	Liquidity coverage ratio (LCR)	Schedule 18 - Notes on Accounts of Annual Report	CRO
iii	Net Stable Funding ratio (NSFR)	Schedule 18 - Notes on Accounts of Annual Report	-DO-
<b>3. Investments</b>			
i	Composition of Investment Portfolio	Schedule 18 - Notes on Accounts of Annual Report	CGM, Treasury & International Banking
ii	Movement of Provisions for Depreciation and Investment Fluctuation Reserve.	Schedule 18 - Notes on Accounts of Annual Report	-DO-
iii	Sale and transfers to/from HTM category	Schedule 18 - Notes on Accounts of Annual Report	-DO-
iv	Non-SLR investment portfolio	Schedule 18 - Notes on Accounts of Annual Report	-DO-
v	Repo transactions (in face value terms)	Schedule 18 - Notes on Accounts of Annual Report	-DO-
<b>4. Asset quality</b>			
i	Classification of advances and provisions held	Schedule 18 - Notes on Accounts of Annual Report	CGM - SAMV / CMCC
ii	Sector-wise Advances and Gross NPAs	Schedule 18 - Notes on Accounts of Annual Report	CGM SAMV



29



Disclosure Policy – 2023-24

S.No	List of Disclosure Items	To be included in	Responsibility
iii	Overseas assets, NPAs and revenue	Schedule 18 - Notes on Accounts of Annual Report	CGM Treasury & International Banking/ CFO
iv	Particulars of resolution plan and restructuring	Schedule 18 - Notes on Accounts of Annual Report	CGM - CMCC / SAMV
v	Divergence in asset classification and provisioning	Schedule 18 - Notes on Accounts of Annual Report	CFO
vi	Disclosure of transfer of loan exposures	Schedule 18 - Notes on Accounts of Annual Report	CGM LCV, CGM SAMV, CGM T & IBD
vii	Fraud accounts	Schedule 18 - Notes on Accounts of Annual Report	CRO
viii	Disclosure under Resolution Framework for COVID-19-related Stress	Schedule 18 - Notes on Accounts of Annual Report	CGM, CMCC
<b>5. Exposures</b>			
i	Exposure to real estate sector	Schedule 18 - Notes on Accounts of Annual Report	CGM MSME, CGM T & IBD
ii	Exposure to capital market	Schedule 18 - Notes on Accounts of Annual Report	CGM All Credit Vertical & CGM Treasury & International Banking.
iii	Risk category-wise country exposure	Schedule 18 - Notes on Accounts of Annual Report	CGM Treasury & International Banking.
iv	Unsecured advances	Schedule 18 - Notes on Accounts of Annual Report	CRO
v	Factoring exposures	Schedule 18 - Notes on Accounts of Annual Report	CGM LCV
vi	Intra-group exposures	Schedule 18 - Notes on Accounts of Annual Report	CFO
vii	Unhedged foreign currency exposure	Schedule 18 - Notes on Accounts of Annual Report	CGM Treasury & International Banking.





6. Concentration of deposits, advances, exposures and NPAs			
i	Concentration of deposits	Schedule 18 - Notes on Accounts of Annual Report	CGM, DMD
ii	Concentration of advances	Schedule 18 - Notes on Accounts of Annual Report	CRO
iii	Concentration of exposures	Schedule 18 - Notes on Accounts of Annual Report	CRO
iv	Concentration of NPAs	Schedule 18 - Notes on Accounts of Annual Report	CGM SAMV
7. Derivatives			
i	Forward rate agreement/Interest rate swap	Schedule 18 - Notes on Accounts of Annual Report	CGM Treasury & International Banking.
ii	Exchange traded interest rate derivatives	Schedule 18 - Notes on Accounts of Annual Report	CGM Treasury & International Banking.
iii	Disclosures on risk exposure in derivatives	Schedule 18 - Notes on Accounts of Annual Report	CGM Treasury & International Banking.
iv	Credit default swaps	Schedule 18 - Notes on Accounts of Annual Report	CGM Treasury & International Banking.
8.	Disclosures relating to securitisation	Schedule 18 - Notes on Accounts of Annual Report	CGM Treasury & International Banking.
9.	Off balance sheet SPVs sponsored (which are required to be consolidated as per accounting norms)	Schedule 18 - Notes on Accounts of Annual Report	CGM Treasury & International Banking.
10.	Transfers to Depositor Education and Awareness Fund (DEA Fund)	Schedule 18 - Notes on Accounts of Annual Report	CGM Operations





11. Disclosure of complaints			
i	Summary information on complaints received by the bank from customers and from the Offices of Ombudsman	Schedule 18 - Notes on Accounts of Annual Report	CGM Operations
ii	Top five grounds of complaints received by the bank from customers	Schedule 18 - Notes on Accounts of Annual Report	-DO-
12.	<b>Disclosure of penalties imposed by the Reserve Bank of India</b>	Schedule 18 - Notes on Accounts of Annual Report	CGM Operations
13.	<b>Disclosures on remuneration</b>	Schedule 18 - Notes on Accounts of Annual Report	CGM, HR
14. Other Disclosures			
i	Business ratios(I to VIII)	Schedule 18 - Notes on Accounts of Annual Report	CFO
	I) Interest Income as a percentage to working funds.	Schedule 18 - Notes on Accounts of Annual Report	-DO-
	II) Non-Interest income as a percentage to working funds.	Schedule 18 - Notes on Accounts of Annual Report	-DO-
	III) Cost of Deposits.	Schedule 18 - Notes on Accounts of Annual Report	-DO-
	IV) Net Interest Margin.	Schedule 18 - Notes on Accounts of Annual Report	-DO-
	V) Operating Profit as a percentage to working funds.	Schedule 18 - Notes on Accounts of Annual Report	-DO-
	VI) Return of Assets	Schedule 18 - Notes on Accounts of Annual Report	-DO-
	VII) Business (deposits plus advance) per employee.	Schedule 18 - Notes on Accounts of Annual Report	-DO-
	VIII) Profit per employee.	Schedule 18 - Notes on Accounts of Annual Report	-DO-
ii	Bancassurance Business	Schedule 18 - Notes on Accounts of Annual Report	CGM DMD
iii	Marketing and distribution	Schedule 18 - Notes on Accounts of Annual Report	CGM DMD
iv	Disclosures regarding Priority Sector Lending Certificates (PSLCs)	Schedule 18 - Notes on Accounts of Annual Report	Agri Business
v	Provisions and contingencies	Schedule 18 - Notes on Accounts of Annual Report	CFO
vi	Implementation of IFRS converged Indian Accounting Standards (Ind AS)	Schedule 18 - Notes on Accounts of Annual Report	CFO





Disclosure Policy – 2023-24

vii	Payment of DICGC Insurance Premium	Schedule 18 - Notes on Accounts of Annual Report	CGM Operations
viii	Disclosure on amortisation of expenditure on account of enhancement in family pension of employees of banks	Schedule 18 - Notes on Accounts of Annual Report	CGM, HR
<b>15</b>	<b>Other RBI Directives</b>		
i	Net Profit or Loss for the period, prior period, items and changes in accounting policies - AS-5	Schedule 18 - Notes on Accounts of Annual Report	CFO
ii	Revenue Recognition - AS-9	Schedule 18 - Notes on Accounts of Annual Report	CFO
iii	Treatment for property, plant and equipment - AS-10	Schedule 18 - Notes on Accounts of Annual Report	SSD
iv	Effects of changes in Foreign Exchange Rates - AS-11	Schedule 18 - Notes on Accounts of Annual Report	IBD
v	Employee Benefits - AS-15	Schedule 18 - Notes on Accounts of Annual Report	CGM HR
vi	Segment Reporting - AS-17	Schedule 18 - Notes on Accounts of Annual Report	CFO
vii	Related Party Disclosures - AS-18	Schedule 18 - Notes on Accounts of Annual Report	CFO
viii	Leases - AS-19	Schedule 18 - Notes on Accounts of Annual Report	SSD
ix	Earnings per share - AS-20	Schedule 18 - Notes on Accounts of Annual Report	CFO
x	Consolidated Financial Statements - AS-21	Schedule 18 - Notes on Accounts of Annual Report	CFO
xi	Accounting for Taxes on Income - AS-22	Schedule 18 - Notes on Accounts of Annual Report	CFO
xii	Accounting for Investments in Associates in Consolidated Financial Statements - AS-23	Schedule 18 - Notes on Accounts of Annual Report	CFO
xiii	Discontinuing Operations - AS-24	Schedule 18 - Notes on Accounts of Annual Report	CFO
xiv	Interim Financial Reporting - AS-25	Schedule 18 - Notes on Accounts of Annual Report	CFO
xv	Intangible Assets - AS-26	Schedule 18 - Notes on Accounts of Annual Report	CFO
xvi	Financial Reporting of Interests in Joint Ventures - AS-27	Schedule 18 - Notes on Accounts of Annual Report	CFO
xvii	Impairment of Assets - AS-28	Schedule 18 - Notes on Accounts of Annual Report	CFO
xviii	Contingent Liabilities - AS-29	Schedule 18 - Notes on Accounts of Annual Report	CFO

*[Handwritten signature]*





16	Miscellaneous		
i	Payment to Micro, Small and Medium Enterprise under the Micro, Small and Medium Enterprise Development Act, 2006.	Schedule 18 - Notes on Accounts of Annual Report	SSD

१६.१





DISCLOSURE REQUIREMENTS AS PER GUIDELINES FOR IMPLEMENTATION OF THE NEW CAPITAL ADEQUACY FRAMEWORK

PILLAR 3 DISCLOSURE REQUIREMENTS

Sr. No	List of Disclosure Items	Table Name	Our Bank's Position/ Requirements of Disclosure	Responsibility
1	<b>SCOPE OF APPLICATION</b>	DF-1	Being Disclosed	CFO, CGM Operation
	(i) <u>Qualitative Disclosures</u>			
	a. List of group entities considered for consolidation			
	Name of the entity/ Country of incorporation			
	Whether the entity is included under accounting scope of consolidation (yes/no)			
	Explain the method of consolidation			
	Whether the entity is included under regulatory scope of consolidation (yes/no)			
	Explain the method of consolidation			
	Explain the reasons for difference in the method of consolidation			
	Explain the reasons if consolidated under only one of the scopes of consolidation			
	b. List of group entities not considered for consolidation both under the accounting and regulatory scope of consolidation			
	Name of the entity/ Country of incorporation			
	Principle activity of the entity			
	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)			

Handwritten initials/signature





Sr. No	List of Disclosure Items	Table Name	Our Bank's Position/ Requirements of Disclosure	Responsibility
	% of bank's holding in the total equity			
	Regulatory treatment of bank's investments in the capital instruments of the entity			
	Total balance sheet assets (as stated in the accounting balance sheet of the legal entity)			
	ii. Quantitative Disclosures:			
	c. List of group entities considered for consolidation			
	Name of the Entity/Country of incorporation (as indicated Above)			
	Principle activity of the entity			
	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)		Being Disclosed	
	Total balance sheet assets (as stated in the accounting balance sheet of the legal entity)			
	d. The aggregate amount of capital deficiencies in all subsidiaries which are not included in the regulatory scope of consolidation i.e. that are deducted:			
	Name of the Entity/Country of incorporation (as indicated Above)			
	Principle activity of the entity			
	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)			
	% of bank's holding in the total equity			
	Capital deficiencies			
	<b>e. The aggregate amounts (e.g. current book value) of the bank's total interests in insurance entities, which are risk-weighted:</b>			
	Name of the insurance entities / country of incorporation			
	Principle activity of the entity			
	Total balance sheet equity (as stated in the accounting balance sheet of the legal entity)			

*Handwritten signature*





Sr. No	List of Disclosure Items	Table Name	Our Bank's Position/ Requirements of Disclosure	Responsibility
	% of bank's holding in the total equity / proportion of voting power			
	Quantitative impact on regulatory capital of using risk weighting method versus using the full deduction method			
	f. Any restrictions or impediments on transfer of funds or regulatory capital within the banking group:			
2	<b>CAPITAL ADEQUACY</b>			
	i. Qualitative Disclosures	DF-2	Bank's approach towards Capital Adequacy for the present & future activities to be assessed & disclosed in qualitative way. Bank's ICAAP Policy to be adhered to. Summary is being disclosed.	
	· Summary of Bank's approach to assess capital adequacy for current and future activities			
	ii. Quantitative Disclosures			
	·Capital requirements for credit risk			CFO/ CRO
	- Portfolios subject to standardized approach			
	- Securitisation exposures -			
	· Capital requirements for market risk -			
	- Standardized duration approach		Being Disclosed	
	·Interest Rate Risk			
	·Foreign exchange risk (including gold)			
	·Equity risk			
	·Capital requirements for operational risk			
	- Basic indicator approach			
	- The Standardised Approach(if applicable)			
	·Common Equity Tier 1, Tier 1 and Total Capital ratios			CRO
	- For the top consolidated group			CGM / GM(All





Sr. No	List of Disclosure Items	Table Name	Our Bank's Position/ Requirements of Disclosure	Responsibility
	<p>- For significant bank subsidiaries (stand alone or sub-consolidated depending on how the Framework is applied)</p> <p><b>Risk exposure and assessment</b></p> <p>The risks to which Bank is exposed and the techniques that Bank use to identify, measure, monitor and control those risks are important factors market participants consider in their assessment of the institution. In this section, several key banking risks are considered: credit risk, market risk, and interest rate risk in the banking book and operational risk. Also included in this section are disclosures relating to credit risk mitigation and asset securitisation, both of which alter the risk profile of the institution.</p> <p>Where applicable, separate disclosures are set out for banks using different approaches to the assessment of regulatory capital.</p> <p><b>General qualitative disclosure requirement</b></p> <p>For each separate risk area (e.g. credit, market, operational, banking book interest rate risk) the Bank must describe its risk management objectives and policies, including:</p> <p>(i) strategies and processes;</p> <p>(ii) structure and organisation of the relevant risk management function;</p> <p>(iii) the scope and nature of risk reporting and/or measurement systems;</p> <p>(iv) policies for hedging and/or mitigating risk and strategies and processes for monitoring the continuing effectiveness of hedges/mitigants</p>		<p>Being Disclosed.</p>	<p>Credit Verticals / CFO</p>
3	<p><b>CREDIT RISK</b></p> <p><b>Qualitative Disclosures</b></p> <p>(a) The general qualitative disclosure requirement with respect to credit risk, including:</p>	DF-3	<p>Analytical and Qualitative Reporting - Being disclosed</p>	<p>CGM SAMV / CRO</p>

*Handwritten signature*





Disclosure Policy – 2023-24

Sr. No	List of Disclosure Items	Table Name	Our Bank's Position/ Requirements of Disclosure	Responsibility
	•Definitions of past due and impaired (for accounting purposes);			
	•Discussion of the bank's credit risk management policy;			
	<b>Quantitative Disclosures</b>			
	(b) Total gross credit risk exposures, Fund based and Non-fund based separately.		Being disclosed.	CRO
	(c) Geographic distribution of exposures, Fund based and Non-fund based separately			CGM /GM (All Credit Verticals)/ CRO
	•Overseas			
	• Domestic			
	(d) Industry type distribution of exposures, fund based and non-fund based separately			CGM SAMV/ CFO
	(e) Residual contractual maturity breakdown of assets,			
	(f) Amount of NPAs (Gross)			
	•Substandard			
	•Doubtful 1			
	•Doubtful 2			
	•Doubtful 3			
	•Loss			
	(g) Net NPAs			
	(h) NPA Ratios			
	•Gross NPAs to gross advances			
	•Net NPAs to net advances			
	(i) Movement of NPAs (Gross)			
	•Opening balance			
	•Additions			
	•Reductions			

*Handwritten signature or initials.*





Disclosure Policy – 2023-24

Sr. No	List of Disclosure Items	Table Name	Our Bank's Position/ Requirements of Disclosure	Responsibility
	•Closing balance			
	(j) Movement of provisions for NPAs		Being disclosed.	CGM SAMV / CFO
	•Opening balance			
	•Provisions made during the period			
	• Write-off			
	•Write-back of excess provisions			
	•Closing balance In addition, write-offs and recoveries that have been booked directly to the income statement should be disclosed separately.			
	(k) Amount of Non-Performing Investments			
	(l) Amount of provisions held for non-performing investments			
	(m) Movement of provisions for depreciation on investments			CGM Treasury & International Banking / CFO
	• Opening balance			
	• Provisions made during the period			
	• Write-off			
	•Write-back of excess provisions			
	• Closing balance In addition, write-offs and recoveries that have been booked directly to the income statement should be disclosed separately.		Being disclosed.	
	(n) By major industry or counterparty type: • Amount of NPAs and if available, past due loans, provided separately; • Specific and general provisions; and • Specific provisions and write-offs during the current period	DF-3	Being disclosed.	CGM SAMV/ CFO





Disclosure Policy – 2023-24

Sr. No	List of Disclosure Items	Table Name	Our Bank's Position/ Requirements of Disclosure	Responsibility
	In addition, banks are encouraged also to provide an analysis of the ageing of past-due loans.			
	(o) Amount of NPAs and, if available, past due loans provided separately broken down by significant geographic areas including, if practical, the amounts of specific and general provisions related to each geographical area. The portion of general provisions that is not allocated to a geographical area should be disclosed separately.	DF-3	To be disclosed	CGM SAMV/ CFO
4	<b>Credit Risk: Disclosures for Portfolios Subject to Standardized Approach</b>	DF-4		
	<b>Qualitative Disclosures</b>			
	(a) For portfolios under the standardised approach			CGM /GMs,All Credit Verticals
	•Names of credit rating agencies used, plus reasons for any changes;		Being disclosed	CRO
	•Types of exposure for which each agency is used; and			--do--
	•A description of the process used to transfer public issue ratings onto comparable assets in the banking book;		To be disclosed	
	<b>Quantitative Disclosures</b>			
	(b) For exposure amounts after risk mitigation subject to the standardised approach, amount of a bank's outstandings (rated and unrated) in the following three major risk buckets as well as those that are deducted;		Being disclosed	
	Below 100 % risk weight			CGM /GM,All Credit Verticals
	100 % risk weight			CRO
	More than 100 % risk weight			
	Deducted			
5	<b>Credit Risk Mitigation: Disclosures for Standardized Approaches</b>	DF-5		
	<b>Qualitative Disclosures</b>			





Sr. No	List of Disclosure Items	Table Name	Our Bank's Position/ Requirements of Disclosure	Responsibility
	(a) The general qualitative disclosure requirement with respect to credit risk mitigation including:		To be disclosed	CGM /GM, All Credit Verticals, CGM SAMV, CGM, Treasury & International Banking CRO
	<b>a) Policies and processes for, and an indication of the extent to which the bank makes use of, on- and off-balance sheet netting;</b>			
	·policies and processes for collateral valuation and management;		Being disclosed	
	·a description of the main types of collateral taken by the bank;		Being disclosed	
	·the main types of guarantor counterparty and their credit worthiness; and		To be disclosed	
	·information about (market or credit) risk concentrations within the mitigation taken		To be disclosed	
	<b>Quantitative Disclosures</b>			
	(b) For each separately disclosed credit risk portfolio the total exposure (after, where applicable, on- or off balance sheet netting) that is covered by eligible financial collateral after the application of haircuts.		Total exposure under the Standardised approach for credit risk is being disclosed.	CGM /GM, All Credit Verticals, CGM SAMV, Treasury & International Banking CRO
	(c) For each separately disclosed portfolio the total exposure (after, where applicable, on- or off-balance sheet netting) that is covered by guarantees/ credit derivatives (whenever specifically permitted by RBI)		Total exposure under the Standardised approach for credit risk is being disclosed.	

Handwritten initials/signature





6	<b>Securitisation Exposures: Disclosure for Standardised Approach</b>	DF-6		
	Qualitative Disclosures			
	(a) The general qualitative disclosure requirement with respect to securitisation including a discussion of:z		To be disclosed as and when the bank does securitization deals	CGM /GM ,All Credit Verticals , CGM SAMV / CRO / CGM, Treasury & International Banking
	.the bank’s objectives in relation to securitisation activity, including the extent to which these activities transfer credit risk of the underlying securitised exposures away from the bank to other entities.			
	.the nature of other risks (e.g. liquidity risk) inherent in securitised assets;			
	. the various roles played by the bank in the securitisation process (For example: originator, investor, servicer, provider of credit enhancement, liquidity provider, swap provider®, protection provider#) and an indication of the extent of the bank’s involvement in each of them;			
	. a description of the processes in place to monitor changes in the credit and market risk of securitisation exposures (for example, how the behaviour of the underlying assets impacts securitisation exposures as defined in paragraph 5.16.1 of Basel III Capital Regulations).			
	.a description of the bank’s policy governing the use of credit risk mitigation to mitigate the risks retained through securitisation exposures;			
	<b>(b) Summary of the bank’s accounting policies for securitisation activities, including:</b>			
	(i)whether the transactions are treated as sales or financings;			
	(ii)methods and key assumptions (including inputs) applied in valuing			

Handwritten initials/signature





positions retained or purchased		
(iii) changes in methods and key assumptions from the previous period and impact of the changes;		
(iv) policies for recognising liabilities on the balance sheet for arrangements that could require the bank to provide financial support for securitised assets		
(c) In the banking book, the names of ECAs used for securitisations and the types of securitisation exposure for which each agency is used		
<b>Quantitative disclosures: Banking Book</b>		
(d) The total amount of exposures securitised by the bank		
(e) For exposures securitised losses recognised by the bank during the current period broken by the exposure type (e.g. Credit cards, housing loans, auto loans etc. detailed by underlying security)		
(f) Amount of assets intended to be securitised within a year		
(g) Of (f), amount of assets originated within a year before securitisation		
(h) The total amount of exposures securitised (by exposure type) and unrecognised gain or losses on sale by exposure type		
(i) <b>Aggregate amount of:</b>		
. on-balance sheet securitisation exposures retained or purchased broken down by exposure type and		
. off-balance sheet securitisation exposures broken down by exposure type		
(j) <b>Aggregate amount of</b> (i) securitisation exposures retained or purchased and the associated capital charges, broken down between exposures and further broken down into different risk weight bands for each regulatory capital approach		
(ii) Exposures that have been deducted entirely from Tier 1 capital, credit enhancing I/Os deducted from total capital, and other exposures deducted from total capital (by exposure type).		
<b>Quantitative Disclosures: Trading book</b>		

Handwritten signature/initials





	(k) Aggregate amount of exposures securitised by the bank for which the bank has retained some exposures and which is subject to the market risk approach, by exposure type		
	(l) <b>Aggregate amount of:</b>		
	(i) on-balance sheet securitisation exposures retained or purchased broken down by exposure type; and		
	(ii) off-balance sheet securitisation exposures broken down by exposure type		
	(m) <b>Aggregate amount of securitisation exposures retained or purchased separately for:</b>		
	(i) securitisation exposures retained or purchased subject to Comprehensive Risk Measure for specific risk; and		
	(ii) securitisation exposures subject to the securitisation framework for specific risk broken down into different risk weight bands.		
	(n) <b>Aggregate amount of:</b>		
	(i) the capital requirements for the securitisation exposures, subject to the securitisation framework broken down into different risk weight bands.		
	(ii) securitisation exposures that are deducted entirely from Tier 1 capital, credit enhancing I/Os deducted from total capital, and other exposures deducted from total capital (by exposure type).		
7	<b>Market Risk in Trading Book</b>	DF-7	CGM Treasury & International Banking
	<b>Qualitative disclosures</b>		CRO
	(a) The general qualitative disclosure requirement for market risk including the portfolios covered by the standardised approach	Being disclosed.	
	<b>Quantitative disclosures</b>		--do--
	(b) The capital requirements for:		
	• interest rate risk;		
	• equity position risk; and		

*Handwritten signature*





	•foreign exchange risk;			
8	<b>Operational Risk</b> <b>Qualitative disclosures</b> • In addition to the general qualitative disclosure requirement, the approach(es) for operational risk capital assessment for which the bank qualifies.	DF-8	As per Basic Indicator approach, suitable disclosure can be made.	CRO
9	<b>Interest Rate Risk in the Banking Book (IRRBB)</b> <b>Qualitative Disclosures</b> (a) The general qualitative disclosure requirement including the nature of IRRBB and key assumptions, including assumptions regarding loan prepayments and behaviour of non-maturity deposits, and frequency of IRRBB measurement. <b>Quantitative Disclosures</b> (b) The increase (decline) in earnings and economic value (or relevant measure used by management) for upward and downward rate shocks according to management’s method for measuring IRRBB, broken down by currency (where the turnover is more than 5% of the total turnover).	DF-9	Being disclosed.	CRO
10	<b>General Disclosure for Exposures Related to Counterparty Credit Risk</b> <b>Qualitative Disclosures</b> (a) The general qualitative disclosure requirement with respect to derivatives and CCR, including (i) Discussion of policies for securing collateral and establishing credit reserves; (ii) Discussion of policies with respect to wrong-way risk exposures; (iii) Discussion of the impact of the amount of collateral the bank would have to provide given a credit rating downgrade. <b>Quantitative Disclosures</b> (b) Gross positive fair value of contracts, netting benefits, netted current credit exposure, collateral held (including type, e.g. cash, government securities, etc.), and net derivatives credit exposure. Also report measures	DF-10	Being disclosed  To be disclosed. Derivatives and Marked to Market positions for Currency and Interest rate derivatives are	CGM Treasury & International Banking /Mid-Office

*Handwritten signature/initials*





	for exposure at default, or exposure amount, under CEM. The notional value of credit derivative hedges, and the distribution of current credit exposure by types of credit exposure		being disclosed.	
	(c) Credit derivative transactions that create exposures to CCR (notional value), segregated between use for the institution’s own credit portfolio, as well as in its intermediation activities, including the distribution of the credit derivatives products used, broken down further by protection bought and sold within each product group.			
11	<b>Composition of Capital</b>	DF-11	Being disclosed	CFO
	Basel III common disclosure template to be used from March 31, 2017.			
	Common Equity Tier 1 capital: instruments and reserves			
	Common Equity Tier 1 capital: regulatory adjustments			
	Additional Tier 1 capital: instruments			
	Additional Tier 1 capital: regulatory adjustments			
	Tier 2 capital: instruments and provisions			
	Tier 2 capital: regulatory adjustments			
	Capital Ratios & buffers			
	National minima (if different from Basel III)			
	Amounts below the thresholds for deduction (before risk weighting)			
	Applicable caps on the inclusion of provisions in Tier 2			
	Capital instruments subject to phase-out arrangements (only applicable between March 31, 2017 and March 31, 2022)			
12	<b>Composition of Capital- Reconciliation Requirements</b>	DF-12	Being disclosed	CFO
	Three Step Approach to Reconciliation Requirements			
	<i>Step 1</i>			
	Capital & Liabilities			
	Assets			
	<i>Step 2</i>			
	Capital & Liabilities			
	Assets			

Handwritten signature or initials.





	Step 3			
	Common Equity Tier 1 capital: instruments and reserves			
13	<b>Main Features of Regulatory Capital Instruments</b>	DF-13	Being disclosed	CFO/CGM Strategy/Vertical Head/Board Secretary
	Issuer			
	Unique identifier (e.g. CUSIP, ISIN or Bloomberg identifier for private placement)			
	Governing law(s) of the instrument			
	Regulatory treatment			
	Transitional Basel III rules			
	Post-transitional Basel III rules			
	Eligible at solo/group/ group & solo			
	Instrument type			
	Amount recognised in regulatory capital (Rs. in million, as of most recent reporting date)			
	Par value of instrument			
	Accounting classification			
	Original date of issuance			
	Perpetual or dated			
	Original maturity date			
	Issuer call subject to prior supervisory approval			
	Optional call date, contingent call dates and redemption amount			
	Subsequent call dates, if applicable			
	Coupons / dividends			
	Fixed or floating dividend/coupon			
	Coupon rate and any related index			
	Existence of a dividend stopper			
	Fully discretionary, partially discretionary or mandatory			
	Existence of step up or other incentive to redeem			
	Noncumulative or cumulative			

24/11/23





	Convertible or non-convertible If convertible, conversion trigger(s) If convertible, fully or partially If convertible, conversion rate If convertible, mandatory or optional conversion If convertible, specify instrument type convertible into If convertible, specify issuer of instrument it converts into Write-down feature If write-down, write-down trigger(s) If write-down, full or partial If write-down, permanent or temporary If temporary write-down, description of write-up mechanism Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument) Non-compliant transitioned features If yes, specify non-compliant features			
14	<b>Full Terms and Conditions of Regulatory Capital Instruments</b> Instruments Full Terms and Conditions Disclosure Requirements for Remuneration	DF-14	Being disclosed.	CFO/CGM Strategy/ Vertical Head/Board Secretary
15	<b>Equities - Disclosure for Banking Book Positions</b> <b>Qualitative Disclosures</b> The general qualitative disclosure requirement with respect to equity risk, including: <ul style="list-style-type: none"> <li>Differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons; and</li> </ul>	DF-15	Not to be disclosed as said disclosure is applicable to private sector and foreign Banks operating in India	N.A

8





<ul style="list-style-type: none"><li>• Discussion of important policies covering the valuation and accounting of equity holdings in the banking book. This includes the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation as well as significant changes in these practices.</li></ul> <p><b>Quantitative Disclosures</b></p> <ol style="list-style-type: none"><li>1. Value disclosed in the balance sheet of investments, as well as the fair value of those investments; for quoted securities, a comparison to publicly quoted share values where the share price is materially different from fair value</li><li>2. The types and nature of investments, including the amount that can be classified as:<ul style="list-style-type: none"><li>• Publicly traded; and</li><li>• Privately held.</li></ul></li><li>3. The cumulative realised gains (losses) arising from sales and liquidations in the reporting period.</li><li>4. Total unrealised gains (losses)*</li><li>5. Total latent revaluation gains (losses)**</li><li>6. Any amounts of the above included in Tier 1 and/or Tier 2 capital</li><li>7. Capital requirements broken down by appropriate equity groupings, consistent with the bank’s methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory transition or grandfathering provisions regarding regulatory capital requirements.</li></ol>			
--	--	--	--

Handwritten initials/signature





Disclosure Policy – 2023-24

	* Unrealised gains (losses) recognised in the balance sheet but not through the profit and loss account. **Unrealised gains (losses) not recognised either in the balance sheet or through the profit and loss account			
16	Summary comparison of accounting assets vs. leverage ratio exposure measure	DF-16	Being disclosed	CFO / CGM Treasury & International Banking
17	Leverage ratio common disclosure template	DF-17	Being Disclosed.	CRO
	Explanatory table for the common disclosure template	DF-18		

१३  
२





## ANNEXURE - III

**SECURITIES AND EXCHANGE BOARD OF INDIA'S (SEBI) DIRECTIVES ON  
DISCLOSURE**

Sr.	List of Disclosure Items	To be included in	Responsibility
1	<b>Management Discussion and Analysis Report:</b>	Management Discussion & Analysis Report in Annual Report	
	Macroeconomic Scenario		CFO
	Global Developments		
	Business Performance of the Bank		
	Resource Management		CGM Operation
	Credit Management		CGM / GM, All Credit Verticals
	Investments & Treasury		CGM Treasury & International Banking
	Asset Quality Management/NPA Management		GM (CRD)
	Priority Sector Lending		GM (Agri)
	Retail Lending		CGM (CRBD)
	International Banking		CGM Treasury & International Banking
	Treasury Operations		CGM Treasury & International Banking
	Information Technology		CGM (DIT)
	People Management - Human Resource Management, Manpower, Staff Welfare measures, Industrial Relations, Sports & Cultural Activities		CGM (HRD)
Official Language, Union Dhara			
Security			
Customer Services & Grievances Redressal	CGM (Operation)		





Sr.	List of Disclosure Items	To be included in	Responsibility
	Machinery		
	Government Business		GM(GBD) & GM(GBD Southern States)
	Risk Management Framework		CRO
	Central Audit and Inspection		CGM(Audit & Inspection)
	Internal Controls and Their Adequacy		Functional heads responsible for disclosure and CFO wherever subjected to Statutory Auditors
	Vigilance		CVO
	Financial performance (Quarterly/half yearly/ Yearly with respect to operational performance in all areas	Quarterly/Half Yearly/ Yearly Financial Statements	CFO
2	<b>Bank's philosophy on Corporate Governance</b>	Corporate Governance Report in Annual Report	GM, Board Secretariat
3	<b>Board of Directors</b> <ul style="list-style-type: none"> <li>• Composition and category of directors</li> <li>• Committee memberships of Directors.</li> <li>• Details of Board Meetings</li> <li>• Details of attendance of each Director for the Board and committees of the Board</li> </ul>	Corporate Governance Report in Annual Report	GM, Board Secretariat
4	<b>Annual General Meeting: Attendance of Directors in AGM</b>	Corporate Governance Report in Annual Report	GM, Board Secretariat

*Handwritten signature/initials*





5	<b>Committees of the Board</b> <ul style="list-style-type: none"><li>• Composition</li><li>• Functions / terms of reference.</li></ul>	Corporate Governance Report in Annual Report	GM, Board Secretariat
6	<b>Details of Shareholders' Complaints</b>	Corporate Governance Report in Annual Report	GM Board Secretariat
7	<b>General Body Meetings:</b> <ul style="list-style-type: none"><li>- Location &amp; time, where last three Shareholders' meetings held, nature of the meeting, special resolutions passed</li></ul>	Corporate Governance Report in Annual Report	GM, Board Secretariat
8	<b>Disclosures</b> <ul style="list-style-type: none"><li>• Remuneration of directors</li><li>• Disclosure of material transactions &amp; pecuniary Relationship</li><li>• Materially significant related party transactions</li><li>• Proceeds from Public issues, Right issues, Preferential issues etc</li><li>• Compliance with SEBI Regulations on Prohibition of Insider Trading</li></ul>	Corporate Governance Report in Annual Report	GM Board Secretariat
	<ul style="list-style-type: none"><li>• Details of fees paid to Statutory Auditors</li></ul>		CFO
	<ul style="list-style-type: none"><li>• Disclosures in relation to Sexual harassment</li></ul>		CGM-HR
9	<b>Means of communication</b>	Corporate Governance Report in Annual Report	GM Board Secretariat.
10	<b>General Shareholder information:</b> <ul style="list-style-type: none"><li>• AGM: Date, time and venue, Financial Calendar</li><li>• Date of Book Closure</li><li>• Dividend Payment Date</li></ul>	Corporate Governance Report in Annual Report	-DO-





	<ul style="list-style-type: none"> <li>• Date of posting of annual reports</li> <li>• Share Transfer System (Registrar &amp; Transfer agents)</li> <li>• Distribution of shareholding</li> <li>• Share holding Pattern</li> <li>• Top 10 shareholders</li> <li>• Unclaimed shares / dividend</li> <li>• Market Price Data: High/Low during each month in last financial year.</li> <li>• Performance in comparison (BSE &amp; NSE)</li> <li>• Dematerialization of shares</li> </ul>			
11	<b>Directors' Report</b>	Directors' Report in Annual Report	CFO	
	- Financial Performance with respect to operational performance in all areas (Financial Highlights, Income Analysis, Spread Analysis, Operating Profit, Provisions & Contingencies, Net Profit & Dividend, Net worth & CRAR, etc)			
	- Branch Network			GM, (SSD)
	- New Business Initiatives / Alternate revenue streams			GM, (DBD)
	- Information Technology & Customer service (E-Banking, Tele-banking, etc)			CGM, (DIT)
- Changes in the Board during the year	GM, Board Secretariat			
12	- Disclosures under applicable SEBI Regulations	Disclosures to stock exchanges where Bank's securities listed and on the website of the Bank	GM, Board Secretariat	





## ANNEXURE - IV

## DISCLOSURE REQUIREMENT FOR DIVERGENCE IN ASSETS CLASSIFICATION AND PROVISIONING

Sr No	Particulars	Amount
1	Gross NPAs as on March 31, 20XX* as reported by the bank	
2	Gross NPAs as on March 31, 20XX as assessed by RBI	
3	Divergence in Gross NPAs (2-1)	
4	Net NPAs as on March 31, 20XX as reported by the bank	
5	Net NPAs as on March 31, 20XX as assessed by RBI	
6	Divergence in Net NPAs (5-4)	
7	Provisions for NPAs as on March 31, 20XX as reported by the bank	
8	Provisions for NPAs as on March 31, 20XX as reported by the RBI	
9	Divergence in provisioning (8-7)	
10	Reported Profit before Provisions and Contingencies for the year ended March 31, 20XX	
11	Reported Net Profit after Tax (PAT) for the year ended March 31, 20XX	
12	Adjusted (notional) Net Profit after Tax (PAT) for the year ended March 31, 20XX after considering the divergence in provisioning	





## ANNEXURE - V

Summary Information on complaints received by the Bank from customers & from the OBOs

Sr. No	Particulars	Previous Year	Current Year
Complaints received by the bank from its customers			
1.	Number of complaints pending at beginning of the year		
2.	Number of complaints received during the year		
3.	Number of complaints disposed during the year		
3.1	Of which, number of complaints rejected by the bank		
4.	Number of complaints pending at the end of the year		
Maintainable complaints received by the bank from OBOs			
5.	Number of maintainable complaints received by the bank from OBOs		
5.1	Of 5, number of complaints resolved in favour of the bank by BOs		
5.2	Of 5, number of complaints resolved through conciliation/mediation/advisories issued by BOs		
5.3	Of 5, number of complaints resolved after passing of Awards by BOs against the bank		
6.	Number of Awards unimplemented within the stipulated time (other than those appealed)		

Note: Maintainable complaints refer to complaints on the grounds specifically mentioned in BO Scheme 2006 and covered within the ambit of the Scheme.





## ANNEXURE - V-A

Top five grounds of complaints received by the bank from customers

Grounds of complaints, (i.e. complaints relating to)	Number of complaints pending at the beginning of the year	Number of complaints received during the year	% increase/ decrease in the number of complaints received over the previous year	Number of complaints pending at the end of the year	Of 5, number of complaints pending beyond 30 days
1	2	3	4	5	6
<b>Current Year</b>					
Ground - 1					
Ground - 2					
Ground - 3					
Ground - 4					
Ground - 5					
Others					
Total					
<b>Previous Year</b>					
Ground - 1					
Ground - 2					
Ground - 3					
Ground - 4					
Ground - 5					
Others					
Total					

Note: The master list for identifying the grounds of complaints is provided in Appendix 1.





## Appendix I

Master list of grounds of complaints to be used for disclosure on the top five ground-wise receipt of complaints by banks under the Annexure VIII-A

1. ATM/Debit Cards
2. Credit Cards
3. Internet/Mobile/Electronic Banking
4. Account opening/difficulty in operation of accounts
5. Mis-selling/Para-banking
6. Recovery Agents/Direct Sales Agents
7. Pension and facilities for senior citizens/differently abled
8. Loans and advances
9. Levy of charges without prior notice/excessive charges/foreclosure charges
10. Cheques/drafts/bills
11. Non-observance of Fair Practices Code
12. Exchange of coins, issuance/acceptance of small denomination notes and coins
13. Bank Guarantees/Letter of Credit and documentary credits
14. Staff behaviour
15. Facilities for customers visiting the branch/adherence to prescribed working hours by the branch, etc.
16. Others

  






ANNEXURE - VI

**Unauthorised Disclosures Report**  
**(Backed by valid documentary evidence)**

Date of Disclosure	Name of officer who disclosed	Brief particulars of disclosure	Place where the disclosure made	How the disclosure made (i.e. means)	To whom the disclosure made

PLACE:

SIGNATURE OF EMPLOYEE

DATE:

**Note:** Disclosures made by employees other than authorised spokespersons or unauthorised disclosure to be reported





ANNEXURE - VII

Disclosures Reports for Quarter: \_\_\_\_\_

1	Details of Disclosure Policy Committee Meetings held	:	
	Actions initiated during the quarter	:	
2	Reputational Risk issues that manifested during the quarter and Responses there against	:	
3	Efficiency and Effectiveness of Bank's Disclosures during the quarter	:	
4	Unauthorized/Inappropriate Disclosures noticed during the quarter	:	
5	Regulatory Compliance issues Respecting Disclosures during the quarter	:	
6	Statutory / Internal Audit Report Details on Disclosure Policy Compliance and Action thereon	:	

PLACE:

CGM / GM

DATE:

(CORPORATE COMMUNICATIONS)

*[Handwritten signature]*



**REFERENCES: -**

1. RBI/DOR/2021-22/83 DOR.ACC.REC.No.45/21.04.018/2021-22 : RBI Master Direction on Financial Statements - Presentation and Disclosures, 2021, as amended.
2. RBI/2022-23/12 DOR.CAP.REC.3/21.06.201/2022-23: RBI Master Circular on BASEL III Capital Regulations, as amended.
3. RBI/DOR/2021-22/86 DOR.STR.REC.51/21.04.048/2021-22: RBI Master Direction on Transfer of Loan Exposures, 2021, as amended.
4. RBI/DOR/2021-22/85 DOR.STR.REC.53/21.04.177/2021-22: Master Direction - Reserve Bank of India (Securitisation of Standard Assets) Directions, 2021, as amended.
5. RBI/2015-16/59 DBR No.Leg.BC.21/09.07.006/2015-16: RBI Master Circular on Customer Service in Banks.
6. RBI/2020-21/87CEPD.CO.PRD.Cir.No.01/13.01.013/2020-21: RBI Circular on Strengthening of Grievance Redress Mechanism in Banks dated January 27, 2021
7. RBI/2022-23/15 DOR.STR.REC.4/21.04.048/2022-23: RBI Master Circular - Prudential norms on Income Recognition, Asset Classification and Provisioning pertaining to Advances dated April 1, 2022.
8. RBI Circular - RBI/2018-2019/146 - DBR.BP.BC.No.29/21.07.001/2018-19 dated 22<sup>nd</sup> March 2019 - Deferred of Implementation of Indian Accounting Standards (Ind AS).
9. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended.
10. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended.
11. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended.
12. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 as amended.
13. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 as amended.
14. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 as amended.
15. SEBI Circular - CIR/CFD/CMD-1/142/2018 dated 19<sup>th</sup> November 2018 on Disclosure of reasons for delay in submission of financial results by listed entities.
16. Insurance Regulatory and Development Authority of India (Registration of Corporate Agents) Regulations, 2015.

