

BASEL II DISCLOSURES

1.1 General

The BASEL II disclosures contained herein relate to Citibank N.A., India Branches (herein also referred to as the 'Bank') and the Non Banking Financial Companies which are subsidiaries of Citigroup Inc. as defined and covered below under the definition of 'Consolidated Bank' for the year ended March 31, 2012. These are complied in accordance with Reserve Bank of India (the 'RBI') regulations on 'Implementation of New Capital Adequacy Framework' vide DBOD.No.BP.BC.11/ 21.06.001 / 2011-12 dated July 1, 2011 as amended from time to time.

The Bank does not have any subsidiaries nor does it hold any significant stake in any company. The RBI guidelines on Financial Regulation of Systemically Important NBFCs and Banks' Relationship vide circular ref. DBOD. No. FSD. BC.46 / 24.01.028/ 2006-07 December 12, 2006 read with 'Guidelines for consolidated accounting and other quantitative methods to facilitate consolidated supervision' vide circular ref. DBOD.No.BP.BC.72/ 21.04.018/2001-02 dated February 25, 2003 mandate coverage of the 'Consolidated Bank' (herein also referred to as 'Citi'). This includes, in addition to the India branch of Citibank N.A (which is the banking subsidiary of Citigroup Inc. operating in India), the following wholly/majority owned non banking finance companies, which are subsidiaries of Citigroup Inc. held through intermediary holding companies:

Citicorp Finance (India) Limited
CitiFinancial Consumer Finance India Limited
Citicorp Maruti Finance Limited

Investments in below mentioned companies have been deducted from the capital of respective parent companies:

Citicorp Capital Markets Limited
Citicorp Clearing Services India Limited

As prescribed in the above guidelines, the Bank is not required to prepare consolidated financial statements. However, certain prudential guidelines apply on a Consolidated Bank basis, including that of capital adequacy computation under Basel II guidelines.

No quantitative disclosures shall apply since there are no subsidiaries of the Bank. Further, the Bank does not have any interests in insurance entities.

1.2 Capital Structure

The capital funds of the Consolidated Bank include the following:

Tier 1 Capital:

1. Interest-free funds from Head Office specifically for the purpose of meeting capital adequacy norms.
2. Statutory reserves calculated at 25 % of each year's profit.
3. Capital reserve not eligible for repatriation so long as the Bank functions in India.
4. Other free reserves
5. Remittable surplus retained for meeting capital adequacy requirements

Tier 2 Capital:

1. Revaluation reserves arising from revaluation of the premises owned after a discount of 55%
2. General Provisions on Standard Assets
3. Investment reserve account

Quantitative disclosures:

	March 31, 2012	Rs. in Lakhs March 31, 2011
Tier I Capital		
Interest-free funds from Head Office	683,476	687,556
Other reserves eligible for Tier I	23,009	22,453
Statutory reserve	365,379	313,430
Remittable Surplus retained for CRAR	661,032	656,508
	<u>1,732,897</u>	<u>1,679,947</u>
Deductions:		
Intangible assets	18,755	16,730
Deferred Tax asset	35,977	34,580
Credit Enhancement on securitisation (50%)	847	3,536
Investment in Subsidiaries	11,423	12,413
Other deductions	21,958	7,050
Total deductions	<u>88,961</u>	<u>74,309</u>
Tier I Capital	<u>1,643,936</u>	<u>1,605,638</u>
Tier II Capital		
Preference Share capital	-	6,300
Property Revaluation Reserves	15,891	16,215
Investment Reserve	11,928	-
General Loss provision on Standard assets and other eligible reserves	52,841	51,214
	<u>80,660</u>	<u>73,729</u>
Deductions:		
Investment in Subsidiaries	11,423	18,713
Credit Enhancement on securitisation (50%)	847	3,536
Total deductions	<u>12,270</u>	<u>22,248</u>
Tier II Capital	<u>68,390</u>	<u>51,481</u>
Total Capital Funds	<u>1,712,326</u>	<u>1,657,119</u>

1.3 Capital Adequacy

The Bank has in place processes to assess and maintain on an ongoing basis the amounts, types and distribution of internal capital that they consider adequate to cover the nature and level of the risks to which they are or might be exposed. The capital plan is put up to the Local Operations Management Committee (LOMC) for review and approval from time to time. The Bank India Branch is primarily engaged in providing wholesale, retail and private banking services.

The Bank has an Internal Capital Adequacy Assessment Process (ICAAP) which establishes a framework for the Bank to perform a comprehensive assessment of the risks they face and to relate capital adequacy to these risks. Further more, the capital analysis performed by the Bank is expected to encompass all significant risks, not only those risks captured by the Pillar 1 minimum regulatory capital calculation. A forward looking capital forecast is prepared annually for the Bank and reviewed by the senior management team. Capital positions are updated in the ALCO. As per applicable guidelines, the ICAAP is subjected to external review.

Citi uses a Risk Based Capital framework to capture and quantify risks across the business. The returns of the products or lines of activity are assessed in relation to the risk capital and are tested against the benchmark.

As required under the Basel II guidelines issued by the Reserve Bank of India, the Bank has adopted Standardised Approach (SA) for credit risk, Standardized Duration approach (SDA) for computing capital requirement for market risks and Basic Indicator Approach (BIA) for operational risk.

Capital requirements for credit risk:

Category	Nature	Rs. in Lakhs			
		As at March 31, 2012		As at March 31, 2011	
		Risk weighted assets	Capital charge	Risk weighted assets	Capital charge
Wholesale exposures	Generally includes exposures to Banks, Financial Institutions and Corporates	5,513,728	496,236	4,601,150	414,013
Retail exposures	Generally includes exposures to individuals and households, small businesses of a retail nature	2,186,695	196,803	2,543,525	228,917
Securitization exposures	Includes credit enhancement which is reduced from Capital funds (refer capital funds details at 1.2 above)	1695	1695	7,071	7,071

Capital requirements for market risk:

Category	Nature	Rs in lakhs			
		As at March 31, 2012		As at March 31, 2011	
		Risk weighted assets	Capital charge	Risk weighted assets	Capital charge
Interest rate risk	Includes specific and general risk on interest rate instruments in the trading book	434,834	39,135	498,227	44,840
Foreign exchange risk	Includes specific and general risk on currencies (including gold)	82,219	7,400	100,329	9,030
Equity risk	Includes specific and general risk on equity instruments	17,989	1,619	36,549	3,289
Total		535,042	48,154	635,105	57,159

Capital requirements for operational risk:

Per the Basic Indicator approach for Operational risk the Bank is required to maintain capital at the rate of 15 % of average gross income (as defined by NCAF circular) of previous three years. The risk weighted assets (RWA) for operational risk are calculated by dividing the operational risk capital charge by 9%. The capital requirement for Operational risk is Rs.123,154 lakhs (Previous year: 129,534 lakhs).

Capital adequacy ratio

Entity	As at March 31, 2012			As at March 31, 2011		
	Total capital ratio	Tier I Capital ratio	Tier II Capital ratio	Total capital ratio	Tier I Capital ratio	Tier II Capital ratio
Citibank N.A.	16.03%	15.15%	0.88%	17.31%	16.49%	0.82%
Consolidated Bank	17.79%	17.08%	0.71%	17.97%	17.42%	0.55%

1.4 Credit risk: General Disclosures

The three principal businesses of the Bank viz Corporate Banking, Commercial Banking and Consumer Banking approve and implement policies and procedures appropriate to their respective risk, business and portfolio. These policies address risk measurement, reporting, monitoring, mitigation and remediation. Senior Management in the credit and business chain are involved in all policy recommendations and review the portfolio on a regular basis.

For the Corporate Bank, the Global Credit Policy along with the Local Credit Policy lays down the parameters/norms for credit exposure. Based on the industry assessment and detailed company analysis and after considering the Target Market Norms & Risk Acceptance Criteria, a credit exposure is approved. Business and Risk Management jointly review and approve facilities for the clients on a periodic basis, periodicity depends on the client. Further Industry specialist and product specialists review and approve sizeable credits. Credit approval limits are granted to individuals based on experience and seniority. The Bank has a global internal policy of internal rating on a global scale to assign Obligor Risk Ratings (ORRs). ORRs define one-year probability of default and are continuously monitored and updated, if required. The Bank also assigns an Obligor Limit Rating (OLR), which provides a medium to long-term view of credit quality. Approval authority is defined as per Total Credit Facilities Approval Grid, which requires higher level of authority to approve large exposures and/or low rated exposures.

The Commercial Markets Business Credit Policies and Procedures define the guidelines and policies under which portfolio is managed supplemented by Credit Programs and MME framework. The sales team prospects customers within approved industry segments. The due diligence is performed by Credit Analyst unit and or Independent Risk who assesses the borrowing requirements and recommends facilities within the parameters set out by the credit programs / framework. The due diligence process includes, but is not restricted to, detailed financial analysis obtaining adequate market information and reference checks from buyers, suppliers, bankers and competitors. All proposals are approved by two officers, at least one of whom has credit initials to cover the facilities proposed.

Consumer banking has segregated Credit Policy and Risk Management Unit, which recommends/approves lending policy, reviews portfolio and takes credit actions. This is supported by a credit operations unit, which reviews proposals for adherence to laid down policies as well as does all verifications prior to disbursal of credit. Credit appraisal is independent of the business stream to ensure unbiased credit judgment. Additionally, there is a collections unit for recovery of past due payments.

NORMS FOR DETERMINING WHEN TO CLASSIFY VARIOUS TYPES OF ASSETS AS NON-PERFORMING

The Bank follows the RBI guidelines for asset classification, which are briefly described herein below.

Term Loans and Consumer loans are treated as a non-performing if the interest and/ or installments of principal remain overdue for a period of more than 90 days.

Cash credits & Overdrafts are treated as non- performing if it remains 'out of order' for a period of more than 90 days.

An account will be treated "out of order" if the outstanding balance remains continuously in excess of the sanctioned limit/drawing power. In case where the outstanding balance is less than the sanctioned limit/drawing power, but there are no credits continuously for three months as on balance-sheet date or credits are not enough to cover the interest debited during the same period, these accounts will be treated as out of order.

Bills purchased /discounted are treated as non-performing if the bill remains overdue and unpaid for a period of more than 90 days during the financial year.

Any other facility (including dues on forward exchange and derivative contracts) will be treated as non- performing if any amount to be received remains overdue for a period of more than 90 days.

Quantitative disclosures:

i) Total Gross Credit Exposure by Industry and geography:

Rs. in Lakhs

Particulars	As of March 2012		As of March 2011	
	Fund Based	Non-Fund Based	Fund Based	Non-Fund Based
Agriculture & Allied Activities	1,110	2,803	1,998	2,797
Aviation	-	289	-	-
Banks	2,602,367	1,597,992	2,031,475	1,663,696
Beverage & Tobacco	96,345	36,419	77,967	18,609
Cement And Cement Prods	19,547	9,912	8,682	9,554
Computer Software	109,069	196,012	171,251	100,976
Constructions	20,607	5,794	16,410	4,727
Drugs & Pharmaceuticals	251,415	63,751	176,968	52,366
Edible Oils & Vanaspati	10,850	1,400	9,522	1,264
Electronics	139,325	140,544	98,817	85,728
Fertilizers	21,573	14,339	17,508	4,330
Gems And Jewellery	5,341	1,737	2,672	1,986
Glass And Glass Ware	19,604	6,649	8,350	3,828
Iron & Steel	75,733	82,208	93,245	62,926
Leather And Leather Products	14,285	1,743	12,844	342
Mining & Quarrying	23,756	32,024	19,789	33,178
Other Food Processing	89,699	38,392	52,444	12,098
Other Industries	1,218,821	77,386	1,008,773	231,494
Other Infrastructure	14,787	5,612	7,540	296
Other Services	-	-	37	-
Other Textile	67,875	10,902	73,525	7,808
Others	1,663,453	19,295	1,467,640	25,398
Others Metal And Metal Products	141,686	58,977	88,539	55,106
Others-Chemicals	141,275	27,950	86,540	22,306
Others-Engineering	234,554	114,084	110,223	92,664
Paper And Paper Products	85,129	15,553	38,918	6,726
Petro Chemicals	83,706	21,335	40,099	13,707
Petroleum, Coal Products And Nuclear Fuels	69,329	258,685	57,516	171,056
Power	52,361	35,670	13,285	22,993
Professional And Other Services	4,741,791	194,375	4,307,966	98,199
Retail Advances	524,528	54,291	1,045,980	38,966
Roads And Ports	-	2,993	0	2,427
Rubber, Plastic & Their Products	52,842	32,164	26,438	17,342
Shipping	25,554	9,815	29,489	10,549
Sugar	4,858	2,085	3,371	4,761
Telecommunications	387,382	86,186	304,881	93,843
Tourism And Hotels And Restaurants	5,013	327	1,239	660
Trading	-	-	-	13
Transport Operator	29,985	17,050	23,544	12,595
Vehicles, Vehicle Parts And Transport Equipments	283,770	113,935	233,985	89,421
Wood And Wood Products	4,186	13,550	3,317	5,396
Overseas	-	-	-	-

ii) Residual contractual maturity breakdown of assets as at March 31, 2012 and as at March 31, 2011.

Rs. in Lakhs

Maturity Bucket	As at March 31, 2012		As at March 31, 2011	
	Loans and Advances	Investments	Loans and Advances	Investments
Day 1	24,026	2,590,855	33,599	1,361,182
2 to 7 days	108,852	525,221	175,304	0
8 to 14 days	136,914	37,943	113,584	0
15 to 28 days	199,704	60,529	200,907	447,130
29 days to 3 months	682,460	128,975	589,940	170,426
Over 3 months to 6 months	780,630	46,556	579,175	100,293
Over 6 months to 12 months	584,693	130,427	671,447	240,778
Over 1 year to 3 years	1,193,141	697,305	1,291,547	754,092
Over 3 years to 5 years	291,294	14,746	242,725	2,078
Over 5 years	1,381,112	120,860	894,836	30,478
Total	5,382,826	4,353,417	4,793,064	3,106,457

iii) Amount of NPAs (Gross)

Rs. in Lakhs

Particulars	As at March 31, 2012	As at March 31, 2011
Substandard	73,821	109,517
Doubtful 1	7,890	26,048
Doubtful 2	3,489	5,348
Doubtful 3	1,407	3,085
Loss	7,002	4,120

iv) Net NPAs: Rs.80,874 Lakhs (Previous year Rs.105,990 Lakhs)

v) NPA ratios:

- Gross NPAs to gross advances: 6.59% (Previous year: 3.06%)
- Net NPAs to net advances: 5.49% (Previous year: 2.23%)

vi) Movement of NPAs

Rs. in Lakhs

Particulars	As at March 31, 2012			As at March 31, 2011		
	Gross NPA	Provision	Net NPA	Gross NPA	Provision	Net NPA
Opening Balance as on April 1	148,118	42,128	105,991	248,733	62,846	185,887
Additions during the year	93,678	44,227	49,450	140,088	31,468	108,620
Recoveries/write offs during the year	113,035	38,468	74,567	240,693	52,189	188,504
Closing Balance as on March 31	128,761	47,886	80,874	148,128	42,125	106,003

vii) Non-performing Investments (NPIs): Rs. 30,000 Lakhs (Previous year: 18,000 Lakhs)

viii) Provision for NPIs: Rs. 19,200 Lakhs (Rs.18,000 Lakhs)

ix) Movement of provisions held towards depreciation on investments

Particulars	Rs. in Lakhs	
	As at March 31, 2012	As at March 31, 2011
Opening Balance as on April 1	110,623	68,770
Additions during the year	1,200	41,853
Recoveries/write offs during the year	27,432	-
Closing Balance as on March 31	84,391	110,623

1.5 Credit Risk: Disclosures for portfolios subject to the standardized approach

The Bank has approved use of ratings issued by CRISIL Limited, Fitch India and ICRA Limited for local exposures as permitted by Reserve Bank of India. For the foreign exposures, the ratings assigned by Standard & Poor's, Moody's and Fitch are used by the Bank.

Where the obligors have obtained rating of the facility from any of the above credit rating agencies, the Bank has applied the risk weights relevant to the ratings so assigned. Where the obligors have not yet obtained such a rating, the exposure has been taken as unrated and appropriate risk weights applied.

The breakdown of the exposure (after mitigation) is as under:

Particulars	Rs. in Lakhs	
	As at March 31, 2012	As at March 31, 2011
Below 100% risk weight	11,409,164	9,262,855
100% risk weight	3,644,876	4,412,196
More than 100% risk weight	1,653,238	1,465,576
Deducted	1,695	1,844

1.6 Credit risk mitigation

The Bank has a three-stage approach to credit risk mitigation i.e. pre-disbursement due diligence, credit approval and post disbursement monitoring. The policies are individually varied for the corporate, consumer/retail and Small and Medium Enterprises (SMEs) segments. Risk mitigation and defeasance techniques are utilized as appropriate in the various lines of business. While security and support are used by the corporate bank as risk mitigants, various risk mitigation tools such as rewrite and settlement programs are used in the consumer bank based on well-defined policies and processes. Ongoing calculation and monitoring ensures that the management is comfortable with the residual risk, which is adequately supported by the capital employed.

Credit review in Consumer/Retail segment is based on an analysis of portfolio behaviour in addition to judgmental review at an obligor level. Pre-disbursement due diligence involves appraisal and legal verification of collateral documents. The legal documentation is vetted and pre-approved.

For SME segment, as per RBI guidelines, the Bank has adopted the comprehensive approach that allows fuller offset of collateral against exposures, by effectively reducing the exposure amount by the value ascribed to the collateral. Under this approach, eligible financial collateral is reduced from the credit exposure to counterparty when calculating their capital requirements subject to hair cuts as prescribed under the guidelines. Credit collateral information is maintained by the Credit Administration. This data is available at facility level and is being used for reporting purposes.

The eligible collaterals used by the Bank as risk mitigants are in the form of cash margin deposits, term deposits and eligible guarantees for arriving at the benefit for capital adequacy purposes. Corporate/parent guarantee etc. do act as a

risk mitigant but not taken benefit of when computing the prudential ratios. Given the nature of collateral, the Bank does not have any concentration risk within the mitigants accepted by the Bank.

Exposure covered by eligible financial collateral after application of hair cut:

Rs in Lakhs			
Category	Nature	As at March 31, 2012	As at March 31, 2011
Wholesale exposures	Generally includes exposures to Banks, Financial Institutions and Corporates	4,667	9,447
Retail exposures	Generally includes exposures to individuals and households, small businesses of a retail nature	Nil	Nil
Securitisation exposures	Includes credit enhancement which is reduced from Capital funds (refer capital funds details at 1.2 above)	Nil	Nil

Exposure covered by guarantees:

Rs in Lakhs			
Category	Nature	As at March 31, 2012	As at March 31, 2011
Wholesale exposures	Generally includes exposures to Banks, Financial Institutions and Corporates	Nil	3,783
Retail exposures	Generally includes exposures to individuals and households, small businesses of a retail nature	Nil	Nil
Securitisation exposures	Includes credit enhancement which is reduced from Capital funds (refer capital funds details at 1.2 above)	Nil	Nil

1.7 Securitisation

Securitisation risk includes the risk that the capital resources held by the firm in respect of assets which it has securitised or participated in any third party securitisation transactions are inadequate having regard to the economic substance of the transaction, including the degree of risk transfer achieved. Typically, in securitisation transactions bank acts as an originator, servicing agent, investor in pass through certificates and provider of credit enhancement or as guarantor.

As an Originator, assets in the form of loan receivables held on the books of the bank are assigned to an independent Special Purpose Vehicle (SPV) which is created as a specific trust by an independent third party acting as the Trustee. The Bank does not have any role in the formation or management of SPVs. The Bank has not sponsored any off-balance sheet vehicles for the purpose of securitisation. The Bank does not provide any direct or indirect support to the SPV. The Bank is not responsible for the solvency or otherwise of the SPV nor is it concerned with any gains or losses that the SPV may make. The Bank obtains True sale opinion and loans so securitised are recorded as sales once the management is satisfied that control over the underlying assets has been transferred. Pursuant to RBI guidelines, the gain arising on securitisation of portfolio, which is the difference between sale consideration and book value of loans, is deferred and recognised in profit and loss account over the life of securities issued by the SPV. Loss, if any, is recognised on upfront basis in the profit and loss account. Expenses relating to securitisation namely rating fees, trusteeship fees and legal expenses are charged to the profit and loss account. Where the Bank is acting as a servicing agent it earns servicing income from the transaction. In certain securitisation structures, the Bank would have retained interest in the form of excess interest strips (also called Interest only strips receivable - IOSR). The Bank provides credit enhancement to support the transaction in the form of guarantee, cash collateral and subordination of IOSR. The Bank has not held any Pass Through Certificates (PTCs) for securitisation transactions where it has acted as originator. The PTCs, if any, held by the Bank, as an investor, are risk weighted based on the external rating assigned to the transaction and are valued as per RBI/FIMMDA guidelines. The credit enhancements provided by the Bank, if any, are deducted from capital funds. The Bank does not have any continuing obligation/ exposure from the securitisation except IOSR and cash collateral. The Bank does not hold any

securitisation exposures in its trading books as an investor or otherwise. Bank is not running any pipeline and warehousing risks with regard to its asset book.

Following the decline in transactions in securitisation market over last several years, the Bank has not carried out any retail loan securitizations in the current period. The wholesale loan securitisation has been largely restricted to single or more corporate loans securitisation not involving any 'packaging' or 'repackaging' of receivables. In these transactions the Bank has not retained any interest in the transactions nor has the Bank provided any credit enhancement. Bank has been able to achieve full risk defeasance by doing these securitisations. None of these wholesale loan assets are of a 'subprime' nature.

As regards the securitisation transactions carried out in the past years, the outstanding position is not significant and the Bank has already built up adequate provision for losses on them. The Bank does not carry any securitisation exposures as an investor. As regards, exposures as an originator of the transactions, the Bank monitors the performance of the portfolios and credit risk thereon and appropriately treats from a capital adequacy perspective. The Bank has not used any credit risk mitigants with regard to securitisation transactions.

Quantitative Disclosures (Banking Book):

	Rs. in Lakhs	
Particulars:	2011-12	2010-11
Total amount of exposures securitised during the year		
Corporate Loans	Nil	Nil
Commercial Vehicles	Nil	Nil
Mortgage	66,520	31,741
For exposures securitised losses recognised by Citi during the current period broken by the exposure type	Nil	Nil
Corporate Loans	Nil	Nil
Amount of assets intended to be securitised within a year	Nil	Nil
Of above, amount of assets originated within a year before securitisation	Nil	Nil
Unrecognised gain on securitisation of deals	709	709
Unrecognised loss on securitisation of deals	Nil	Nil
Aggregate amount of On-Balance Sheet securitisation exposures/wholeloan sale retained or purchased		
IOSR (subordinated)	1,158	1,487
IOSR (non-subordinated)	0	0
Cash Collaterals	4,659	5,189
Investment in Pass Through Certificates (PTCs)	Nil	Nil
Aggregate amount of off-balance sheet securitisation exposures		
Guarantees	0	0
Exposures that have been deducted entirely from Tier 1 and Tier 2 capital		
IOSR (subordinated)	1,158	1,487
IOSR (non-subordinated)	Nil	Nil
Cash Collaterals	4,659	5,189
Guarantees	0	0

Aggregate amount of securitisation exposures retained and the associated capital charges, broken down between exposures and further broken down into different risk weight bands for each regulatory capital approach:

Exposure Type	Capital Approach	2011-12			2010-11		
		Amount	Rating	Capital Charge	Amount	Rating	Capital Charge
IOSR (subordinated)	Deducted from capital	1,158	Unrated	1,158	1,487	Unrated	1,487
IOSR (non-subordinated) 1	Deducted from capital	Nil	Unrated	Nil	Nil	Unrated	Nil
Cash Collaterals	Deducted from capital	4,659	Unrated	4,659	5,189	Unrated	5,189
PTC Tranche 1	Forms part of RWA	Nil	Nil	Nil	Nil	Nil	Nil
PTCs Tranche 2	Forms part of RWA	Nil	Nil	Nil	Nil	Nil	Nil
Guarantees	Deducted from capital	Nil	Nil	Nil	Nil	Nil	Nil

The Bank has from time to time used ratings of CRISIL Limited, ICRA Limited and Fitch India for rating its securitisation transactions.

There are no quantitative disclosures required to be made for trading book as Citi is not holding any position.

1.8 Market risk in trading book

Market Risk is the risk of loss due to changes in the market values of the Bank's assets and liabilities caused by changes in interest rates, currency exchange rates and security prices.

The capital charge for interest rate related instruments and equities would apply to current market value of these items in Banks trading book. Since the Bank is required to maintain capital for market risks on an ongoing basis, the trading positions are marked to market on a daily basis. The current market value is determined as per extant RBI guidelines on valuation of investments.

The minimum capital requirement is expressed in terms of two separately calculated charges: Specific risk charge for each security, which is designed to protect against an adverse movement in the price of an individual security owing to factors related to the individual issuer. General market risk charge, which is towards interest, exchange and price risk in the portfolio in different securities or instruments.

Specific charge is computed in line with the rates for capital charge provided under the RBI guidelines on Prudential Norms on Capital Adequacy. The capital requirements for general market risk are designed to capture the risk of loss arising from changes in market interest rates. The Bank follows the duration method for measurement of the general market risk charge on investments portfolio. Measurement of market risk charge for interest rates include all interest rate derivatives and off-balance sheet instruments in the trading book, which react to changes in interest rates. The Bank has adopted intermediate approach for measuring the price risk for options. Options are reported as a position equal to the market value of the underlying multiplied by the delta. In addition, capital charge is also provided for the gamma and vega risk.

Capital charge for market risks in foreign exchange is 9% on the open position limit of the Bank. This capital charge is in addition to the capital charge for credit risk on the on-balance sheet and off-balance sheet items pertaining to foreign exchange.

On the equity position in the investment portfolio capital charge has been maintained at 11.25% for specific risk and 9% for general risk.

The Bank is integrated into the overall Citigroup risk and control framework, balancing senior management oversight with well-defined independent risk management functions. It is the responsibility of the senior management of the Bank to implement Citigroup policies and practices, to oversee risk management, and to respond to the needs and issues in the Bank. The Bank's policy is to control material market risks through a framework of limits & triggers which are approved by LOMC and to manage any residual exposure through a series of sensitivity analyses, scenario tests and robust controls over calculating, monitoring and reporting results.

The risk appetite is largely determined and controlled due to regulatory limits on foreign exchange and interest rate exposure. The spot foreign exchange exposure is limited through Net Open Position which is approved by RBI and the interest rate exposure on derivatives is controlled through the gross PV01 limit which is restricted to 0.25% of the networth of the Bank as required by RBI. Further, the aggregate interest rate exposures on trading account is limited by limits on PV01 which is much below the stipulated Gross PV01 limits established by RBI.

Risk is measured in terms of:-

- (a) Factor sensitivities (DV01 – impact of change of rates by one basis point) for interest rate products, FX Delta for Spot position, Vega and Gamma limits for FX Options. These measures & limits are further sub-divided for each yield curves and currencies.
- (b) Value-at-risk Trigger, which measures maximum potential loss at 99% confidence level over 1-day holding period based on the day's outstanding risk positions across the entire mark-to-market exposures.
- (c) Loss Triggers: The Trading book and available for sale book profit and loss monitored against month-to-date and inception-to-date (for available for sale) Loss Triggers.
- (d) Aggregate Contract Trigger Limits: The notional positions for swaps (INR, FCY and cross-currency) and options are monitored against these limits.

All market risk taking activity in the Bank is centralised with Treasury and undertaken by authorised dealers. The Treasury is subject to limits and triggers across all products and risk factor. The Bank's Risk Management Policy approved by LOMC defines the process and procedures of limit approvals, changes, delegation, reporting and escalation in case of limit excesses and trigger breaches. The independent Market Risk Management reports and monitors the trading risk exposures against approved limits and triggers on a daily basis. An excess or a breach is reported and dealt with appropriately for corrective action with reporting to ALCO, LOMC and Senior Market Risk Management and Corporate Treasury.

Capital requirements for market risk:

Category	As at March 31, 2012		As at March 31, 2011	
	Risk weighted assets	Capital charge	Risk weighted assets	Capital charge
Interest rate risk	434,834	39,135	498,227	44,840
Foreign exchange risk (including gold)	82,219	7,400	100,329	9,030
Equity position risk	17,989	1,619	36,549	3,289
Total	522,582	47,032	635,105	57,159

1.9 Operational risk

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. The Bank is primarily engaged in commercial and consumer banking operations. Since many of these activities carry a high degree of operational risk, management places a very high value on maintaining an effective control environment to mitigate this. The appetite for residual operational risk is relatively low. There is satisfactory organizational set up for the management of Operational risk.

Citi's Risk and Control Self-Assessment (RCSA), in conjunction with the Operational Risk Standards process is the primary mechanism for identifying operational risks to which the organization is exposed. The Bank has an Operational risk governance structure defined by the Risk and Control Self-Assessment/Operational Risk Policy and Standards. The RCSA process and the operational risk process establish a foundation on which the activities of the sectors and functions, the resulting operational risks, and the associated controls are identified, periodically assessed, subjected to corrective action, appropriately documented, and communicated. The operational risk process is utilized to promote transparency, facilitate senior management and LOMC awareness and understanding of operational risk loss experience and exposures and to encourage the utilization of risk indicators to manage operational risks. The operational risk process is made up of components to identify and assess key operational risks, establish key risk indicators and perform comprehensive operational risk reporting. Senior management committee reviews results of RCSA testing and operational risk framework and identifies areas where the management of the operational risk can be strengthened. Operational Risk data is captured in a systematic manner to provide the details of the nature of the operational loss, key controls that failed and the preventive measures/corrective actions in respect of the same and the same reported to the committee.

The Bank has a separate function assigned with the responsibility for establishing and providing independent oversight of the operational risk management framework for Citibank, including data collection and risk measurement standards. This function is also responsible for ensuring the communication of aggregate Citi-wide operational risk exposures and loss experience to the senior management. Further, Internal Audit function provides independent assessment and evaluation of Citibank's compliance with the policy, including assessing the adequacy and effectiveness of the risk management and control processes for operational risk measurement methodology and systems.

Citi has adopted the basic indicator approach to operational risk for capital adequacy computation. Given the low experience of actual operational loss events, this is more than adequate to support this risk.

The act of fraud committed by a Relationship Manager reported in the financials for the previous year was duly investigated by the regulatory and enforcement agencies as well as internal audit and business groups within Citi. A detailed corrective action plan was implemented by the Bank including comprehensive evaluation of internal controls in all aspects of branch operations and particularly with regard to selling of investment products. Appropriate disciplinary action has been instituted against the employees involved in acts of wrong doing. The loss has been settled as per terms of Citi's insurance policy.

1.10 Interest rate risk in banking book (IRRBB)

Interest rate risk represents the Bank's exposure to adverse movements in interest rates with regard to its non-trading exposures. Interest rate risk is measured by doing a gap analysis as well as factor sensitivity analysis. Business-specific assumptions underlying these measurements, e.g., tenor bucket used for demand deposits, are documented and models used to measure interest rate risk are independently reviewed. Interest rate gap analysis utilizes the maturity or repricing schedules of balance sheet items to determine the differences between maturing or repricing items within given tenor buckets. Interest rate exposure (IRE) measures the potential pre-tax earnings impact, over a specified reporting period, for the accrual positions, from a defined change in the yield curve. Residual market risk is also monitored using a series of measures, including factor sensitivities (PV01) and stress testing. Factor sensitivities (PV01) are expressed as the change in the value of a position for a defined change in a market risk factor, such as a change in the value of a position for a one basis point change in interest rates. Independent Market Risk Management monitors factors for all relevant market risk.

The Bank undertakes Stress Testing for its banking book to assess the likely absolute loss and its impact on the net worth of the bank. Interest Rate stress parameters are based on sophisticated statistical analysis which provides tenor based stress parameter for different interest rate scenarios. The stress impact is estimated by multiplying factor sensitivity (dv01) for each tenor by the relevant tenor stress parameter which is further aggregated for each interest rate scenario. The stress

impact as provided below is based on the worst loss interest scenario thereby capturing the direction of the interest rate risk positioning across the yield curve. The size of the stress parameter differs for each tenor and for each interest scenario reflecting the underlying economic condition.

Impact on earnings/ economic value/ capital for interest rate shocks by currency:

Currency	As at March 31, 2012		Rs. in Lakhs As at March 31, 2011	
	Earnings	Capital	Earnings	Capital
INR	14,518	53,015	19,451	44,896
FCY	546	878	450	797
Total	15,064	53,918	19,901	45,693

Notes:

- Impact on Earnings reflects stress loss on interest rate risk up to 1yr.
- Impact on Capital reflects stress loss on interest rate risk for all tenors.