



PRUDENTIAL PRACTICE GUIDE

Draft APG 110 Capital Adequacy

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About this guide

Prudential practice guides (PPGs) provide guidance on APRA's view of sound practice in particular areas. PPGs frequently discuss legal requirements from legislation, regulations or APRA's prudential standards, but do not themselves create enforceable requirements.

Prudential Standard APS 110 Capital Adequacy (APS 110) sets out APRA's requirements for capital adequacy for authorised deposit-taking institutions (ADIs). This PPG, *Prudential Practice Guide APG 110 Capital Adequacy* (APG 110), aims to assist ADIs in complying with those requirements.

This PPG should be read in conjunction with APS 110 and *Prudential Practice Guide CPG 110 Internal Capital Adequacy Assessment Process and Supervisory Review* (CPG 110), as well as APRA's other prudential standards and associated guidance for ADI capital. Not all of the practices outlined in this PPG will be relevant for every ADI, and some aspects may vary depending upon the size, complexity and risk profile of the institution.

Glossary

ADI	Authorised deposit-taking institution as defined in the <i>Banking Act 1959</i>
APS 110	<i>Prudential Standard APS 110 Capital Adequacy</i>
APS 112	<i>Prudential Standard APS 112 Capital Adequacy: Standardised Approach to Credit Risk</i>
APS 113	<i>Prudential Standard APS 113 Capital Adequacy: Internal Ratings-Based Approach to Credit Risk</i>
APS 115	<i>Prudential Standard APS 115 Capital Adequacy: Standardised Measurement Approach to Operational Risk</i>
APS 116	<i>Prudential Standard APS 116 Capital Adequacy: Market Risk</i>
APS 120	<i>Prudential Standard APS 120 Securitisation</i>
APS 180	<i>Prudential Standard APS 180 Capital Adequacy: Counterparty Credit Risk</i>
APS 330	<i>Prudential Standard APS 330 Public Disclosure</i>
Basel Committee	Basel Committee on Banking Supervision
CCB	Capital conservation buffer
CCyB	Countercyclical capital buffer
CPG 110	<i>Prudential Practice Guide CPG 110 Internal Capital Adequacy Assessment Process and Supervisory Review</i>
D-SIB	An ADI that has been determined by APRA to be a domestic systemically important bank
IRB ADI	An ADI which has been approved by APRA to use the internal ratings-based (IRB) approach to credit risk
Non-SFI	Non-significant financial institution, as defined in APS 110
Prudential capital requirement (PCR)	The minimum amount of Regulatory Capital that an ADI or NOHC must hold, as defined in APS 110. Eligible Regulatory Capital is defined in <i>Prudential Standard APS 111 Capital Adequacy: Measurement of Capital</i>
RWA	Risk-weighted assets
SA-CCR	Standardised approach to counterparty credit risk
SFI	Significant financial institution, as defined in APS 110
Standardised ADI	An ADI which has not been approved by APRA to use the internal ratings-based approach to credit risk

Introduction

1. APS 110 sets out APRA's requirements for capital adequacy for ADIs. Under APS 110, ADIs must maintain adequate capital for the risks associated with their activities. The ultimate responsibility for the prudent management of capital rests with the Board.
2. This PPG provides guidance to assist ADIs in meeting the requirements of APS 110. It focuses on key aspects of the standard that are specific to ADIs: the operation of capital buffers, the countercyclical capital buffer, simplified requirements for small ADIs, the IRB capital floor and the leverage ratio.
3. This PPG should be read in conjunction with CPG 110, which provides Boards, senior management and other key stakeholders with broader guidance on capital management. CPG 110 focuses on the internal capital adequacy assessment process (ICAAP) and APRA's supervisory review process for capital.
4. This PPG should also be read in conjunction with APRA's other prudential standards and guidance for ADI capital management, where relevant. A summary of these is set out in Table 1 below.

Table 1. APRA capital standards and guidance

Standards	APRA code	Covers
Capital adequacy	APS 110, APG 110, CPG 110	Capital adequacy: overarching requirements for maintaining capital adequacy and for capital management
Capital definitions	APS 111	Measurement of capital: criteria for measuring an ADI's regulatory capital, specifically the criteria that capital instruments must meet to qualify as Common Equity Tier 1 capital, Additional Tier 1 or Tier 2 capital
Credit risk	APS 112, APG 112, APS 120, APG 120, APS 180	Standardised approach to credit risk: measurement of credit risk capital requirements based on standardised risk weights, with associated capital requirements for securitisation and counterparty credit risk exposures.
Credit modelling	APS 113, APG 113	Internal ratings-based approach to credit risk: measurement of credit risk capital requirements based on advanced internal models
Operational risk	APS 115	Standardised measurement approach to operational risk: measurement of operational risk capital requirements
Market risk	APS 116, APS 117	Market risk: measurement of capital requirements for market risk and, for advanced ADIs, interest rate risk in the banking book risk.

Chapter 1 - Capital management

This section provides guidance on APS 110 Paragraphs 23-45, and Attachment B.

Minimum capital requirements

5. ADIs are subject to minimum prudential capital requirements (PCRs) under APS 110, as set out in Table 2. Minimum PCRs are set for different tiers of capital, namely Common Equity Tier 1 Capital (CET 1), Tier 1 Capital and Total Capital.
6. ADIs must maintain capital ratios above PCRs at all times. As required under APS 110 (paragraph 45), ADIs must inform APRA as soon as practicable where there are any significant departures from their ICAAPs, concerns about capital adequacy (including projected losses), or indications of significant adverse changes in market pricing.

Table 2. Minimum prudential capital requirements (PCR)

Minimum requirements	Standardised	IRB	D-SIB
CET1	4.5%	4.5%	4.5%
Tier 1	6%	6%	6%
Total Capital	8%	8%	8%

7. APRA may determine a higher PCR for an ADI at any time. Further detail on the process for any 'Pillar 2' supervisory adjustments to PCRs is set out in CPG 110.¹ There are a range of circumstances in which an adjustment may be required, including, but not limited to, where:
 - a) capital requirements under the prudential standards do not fully address risks specific to the entity, such as strategic risk, reputation risk, concentration risk or other risks;
 - b) an entity has a higher risk business model or complex organisational structure, is newly licensed, or is making material changes to business mix; or
 - c) there are material concerns regarding weaknesses in governance or risk management, a failure to comply with prudential standards or inadequacies in capital management.

¹ The Basel framework for capital rests on three pillars. 'Pillar 1' is quantitative requirements for capital as set out in the prudential standards and measured in risk weighted asset (RWA) terms. 'Pillar 2' is the supervisory review process, which includes supervision of risk management and may include adjustments to capital requirements. 'Pillar 3' is disclosure requirements designed to encourage market discipline.

8. APRA may also adjust an ADI's PCR to ensure that there is sufficient loss-absorbing capacity for resolution. This would typically be implemented through an adjustment to an ADI's Total Capital PCR.
9. An ADI must not disclose its individual PCR ratios. This approach is consistent across all ADIs, as disclosure by one may create pressure for disclosure by others. It is intended to manage the risk that disclosure could result in unintended or incorrect signalling, leading to financial instability at one or more ADIs.
10. A prudent ADI would discuss with APRA whether, and if so how, to disclose any material APRA-determined supervisory adjustments to 'Pillar 1' RWA requirements, such as supervisory overlays, in public financial and regulatory reporting. If disclosed, good practice would be to clearly identify and explain the supervisory adjustment, including any associated corrective action being undertaken.

Reductions in capital

11. An ADI must obtain APRA's prior approval for any planned reduction in capital, including a share buyback or where the aggregate amount of dividend payments on ordinary shares exceeds statutory after-tax earnings ('the profits test'). APRA's approval would be required for a reduction in capital even in circumstances where there is a subsequent offsetting benefit to capital adequacy, such as the write-off of intangible items which may reduce CET 1 deductions.
12. An ADI proposing a reduction must provide APRA with a forecast of its capital position extending for at least two years, as required by APS 110 (paragraph 42). Such a forecast would ideally include:
 - a) detailed capital projections at all tiers of capital;
 - b) supporting assumptions on the economic outlook, profitability, growth and other movements in RWAs; and
 - c) the results of recent stress testing, demonstrating that capital would remain adequate in adverse conditions after the proposed reduction.
13. Although decisions to reduce capital can be time sensitive, a prudent ADI would ensure it allowed sufficient time for the supervisory review of the proposal in its planning.

Capital buffers

14. ADIs are required to hold regulatory capital buffers above minimum CET 1 requirements. There are three types of regulatory buffer: the capital conservation buffer (CCB), the

additional CCB for domestic systemically important banks (D-SIB), and the countercyclical capital buffer (CCyB).²

15. ADIs must have sufficient CET 1 to meet the CCB buffer requirement, and cannot double-count for this purpose any amount of CET 1 that is already being used to meet minimum requirements for Tier 1 and Total Capital.³
16. APRA may also determine a PCR, CCB or CCyB expressed as a dollar amount, rather than or in addition to a ratio to risk weighted assets (RWAs). This may be adopted, for example, in the early stages after licensing a new ADI.

Table 3. Capital buffers

CET 1 (% RWA)	Standardised	IRB	D-SIB
Minimum PCR	4.50%	4.50%	4.50%
CCB	2.50%	3.75%	3.75%
Additional CCB for D-SIBs	-	-	1.00%
CCyB	1.00%	1.00%	1.00%
Total	8.00%	9.25%	10.25%

Note: the CCyB may be set within a range of 0 - 3.5 per cent of RWA, with a baseline level of 1.0 per cent

17. APRA expects that ADIs will also set their own management buffers and targets for all tiers of capital. These targets would typically be defined as a range to account for any sizeable outflows, such as dividends. A prudent ADI would ensure it maintains:
 - a) an adequate management buffer above the top of the CCB in stable operating conditions, to allow for business growth, volatility in RWAs, profit and capital surplus, and dividend policy; and
 - b) an adequate combined regulatory and management buffer sufficient to withstand a severe but plausible downturn while remaining above PCR, calibrated based on regular stress testing.

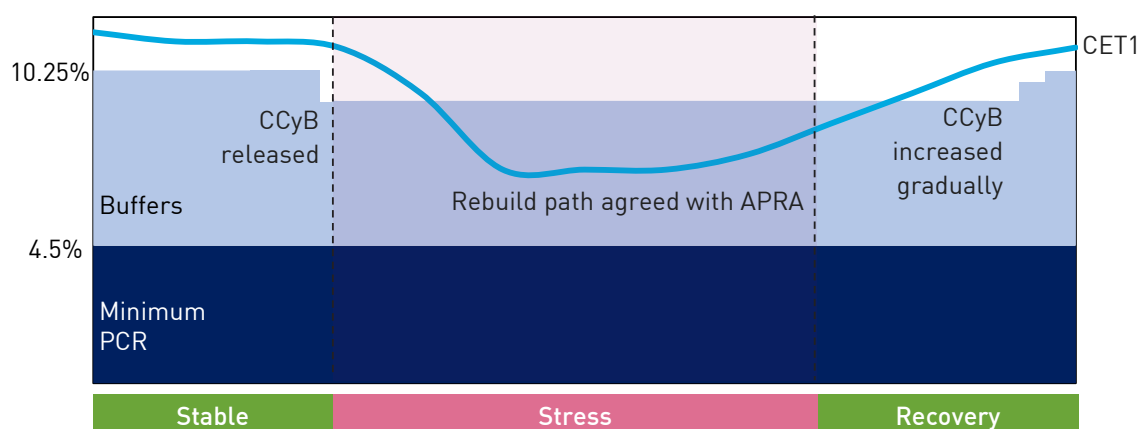
² APRA Information Paper, Domestic systemically important banks in Australia, [information-paper-domestic-systemically-important-banks-in-australia-december-2013.pdf](https://www.apra.gov.au/information-paper-domestic-systemically-important-banks-in-australia-december-2013.pdf) ([apra.gov.au](https://www.apra.gov.au))

³ For example, an ADI with a minimum CET 1 of 4.5% and minimum Tier 1 of 6.0% would typically hold Additional Tier 1 (AT1) capital instruments of 1.5%. If this ADI only held AT1 of 1.0%, then 5.0% of its CET 1 would not be eligible to be used to meet the CCB requirement.

Use of buffers in stress

18. APRA expects that an ADI would not normally operate in the capital buffer range during stable conditions, and would not ordinarily make a discretionary distribution that takes it into the buffer range.
19. An ADI may, however, use buffers during periods of stress, if needed. The CCyB is designed to ensure that an ADI can absorb the impact of losses and continue to lend during periods of stress. To do so would not be a breach of prudential requirements: indeed, this is the intent of the buffer framework.⁴
20. APRA does not expect ADIs to maintain operating targets above the capital buffer range in a severe stress scenario. It is important that ADIs make use of the flexibility in capital buffers to continue to lend to support households and businesses during periods of stress, rather than seek to conserve capital by restricting credit supply.
21. An illustration of how buffers may be used in a systemic stress scenario is presented below, including a capital rebuild path that would be agreed with APRA. In such circumstances, a prudent ADI would conduct more regular stress testing, review, update and potentially initiate recovery plans and other contingency measures, and moderate capital distributions (including meeting any constraints of the buffer range).

Figure 1. Major bank capital ratios: use of buffers in stress



22. An ADI that is operating in the buffer range, or that expects to do so, would agree a restoration path back out of the range with APRA. To support this, a prudent ADI would provide capital projections, based on a range of scenarios and approved by the Board, to APRA.
23. The timeframe that APRA would expect an ADI to move out of the buffer range would depend on the nature and severity of the stress scenario, as well as a range of other

⁴ Buffers also accommodate changes in capital ratios from procyclicality in credit risk RWA. APRA expects that IRB ADIs would aim to avoid excessive procyclicality by, for example, adopting a through-the-cycle rating philosophy and modifying inputs in rating systems to remove excessive volatility. Further guidance on this is provided in APG 113.

factors. Such factors could include the outlook for the ADI's profitability, growth and capital, as well as the outlook for the industry and economy more broadly. During a prolonged or severe stress period, an ADI's restoration path out of the buffer range may be a year or more. During a milder or shorter period of stress, the restoration path may be able to be quicker than this.⁵

Capital distributions

24. Capital distributions are those that impact CET 1, including dividends, share buybacks, dividend and interest payments on Additional Tier 1 instruments, and discretionary bonus payments to staff.⁶
25. If an ADI's CET 1 capital ratio falls within the capital buffer range, maximum limits on capital distributions as a proportion of earnings come into force. The capital buffer range is the sum of the CCB (including any D-SIB buffer) and the CCyB.
26. The maximum limits reduce as CET 1 falls through the buffer range, depending on which quartile of the range the ADI is in. The quartiles are set out in APS 110 (Attachment B). Examples are presented in Table 4, based on typical buffers for a Standardised ADI or D-SIB.

Table 4. Buffer range constraints

Buffer range	Earnings that must be retained ⁷	Maximum earnings that can be paid out	Example 1: Standardised ADI CET 1	Example 2: D-SIB CET 1
Above the top	0%	100%	>8.0%	>10.25%
Fourth quartile	40%	60%	>7.1%	>8.8%
Third quartile	60%	40%	>6.3%	>7.4%
Second quartile	80%	20%	>5.4%	>5.9%
First quartile	100%	0%	>4.5%	>4.5%

Note: the CET 1 levels have been rounded to 1 decimal place. The examples here assume the CET 1 buffers as outlined in Table 3 above. APS 110 refers to minimum capital conservation ratios, which represents the proportion of earnings to be retained. An ADI may not make any distributions if it does not have positive earnings and is within the CCB.

⁵ APRA may impose limits on the period in which an ADI may operate within the capital buffer range, on a case-by-case basis, under APS 110 (Attachment B, paragraph 5).

⁶ Payments that do not result in a depletion of CET1 are not considered distributions for the purpose of calculating constraints under APS 110 Attachment B.

⁷ Earnings would typically be based on the most recent rolling 12-month period.

27. In the example above, a D-SIB planning a dividend payout of 50 per cent of earnings would not be constrained until CET 1 fell below 7.4 per cent, at which point the maximum distribution would be limited to 40 per cent of earnings.
28. A prudent ADI would, however, adopt a cautious approach to capital distributions during a period of stress even if it is operating above these levels. An ADI's actions would typically include moderating dividend payout ratios, and considering the use of dividend reinvestment plans and other capital management initiatives to reinforce capital positions and provide the capacity to continue lending.⁸
29. An ADI may seek to raise capital in such conditions, such as through an issuance of new equity. In these circumstances, an ADI may apply to APRA to make payments in excess of limits in the buffer range, but only where it has a capital plan that details measures to raise capital equal to or greater than the amount it plans to distribute (as required under APS 110, paragraph 31). In assessing such an application, APRA would have regard to the likelihood of the capital raising being successful, the impact on the ADI's capital position, market conditions, precedents for other ADIs, the economic outlook, capital projections and other factors.
30. The limits specified in APS 110 (Attachment B) continue to apply while an ADI is operating within the buffer range. If an ADI moves further into/out of the buffer range (into a higher/lower quartile), then the more/less restrictive constraint would apply. If an ADI rebuilds its CET1 ratio above the top of the buffer range, then limits would immediately cease to apply.

⁸ APRA may impose restrictions on capital distributions even where an ADI's CET1 ratio is above the buffer range, under APS 110 (Attachment B, paragraph 4).

Chapter 3 - Simplified requirements

This section provides guidance on simplified capital requirements for non-SFIs.

46. Smaller, less complex ADIs may be eligible for simplified capital requirements. These ADIs are classified as non-significant financial institutions (non-SFIs) for regulatory capital purposes.¹⁴
47. Non-SFIs are small domestic ADIs with total assets less than \$20 billion, no trading activities, no international activities and no offshore funding.¹⁵ These ADIs use the Standardised approach to determining capital requirements, as IRB ADIs are classified as SFIs.
48. The table below summarises the threshold and criteria for classifying ADIs as non-SFIs. However, an ADI that meets the non-SFI criteria may still be determined to be an SFI by APRA, having regard to matters such as complexity in its operations or its membership of a group.

Table 7. Non-SFIs eligible for simplified requirements

Categories	Non-SFI	SFI
Capital approach	Standardised only	IRB or Standardised
Size	Total assets < \$20 billion	Total assets > \$20 billion
Foreign ADIs	Excludes foreign-owned ADIs	Includes foreign-owned ADIs
Criteria	<ul style="list-style-type: none"> No trading book No material non-centrally cleared derivatives Activities only in Australia No offshore funding 	<ul style="list-style-type: none"> Operates a trading book Has material non-centrally cleared derivatives Overseas activities Sources funding offshore
Examples	Small banks and mutual ADIs	Major banks, complex banking groups and large regional banks

49. APRA will notify an ADI that has total assets less than AUD \$20 billion and is not foreign-owned ADI whether it is classified as an SFI or non-SFI before 1 January 2023. An ADI

¹⁴ The definition of a non-SFI is set out in APS 110, paragraph 9.

¹⁵ Total assets is as derived in Reporting Standards ARS 322.0 Statement of Financial Position or ARS 720.0 ABS/RBA Statement of Financial Position. Offshore funding includes, for non-deposit funding, offshore securities as defined in Reporting Standard ARS 210 Liquidity and for deposit funding, offshore deposits from a non-resident, which under ARF 210.3.2, is determined by the domicile of the counterparty. Offshore funding would not include, for example, overseas investors that buy AUD-denominated securities of an ADI (such as securitisations).

that has total assets in excess of AUD \$20 billion or is a foreign-owned ADI will be classified as an SFI.

Simplified requirements

50. A non-SFI is subject to simplified requirements for determining its risk-based capital ratio, as set out in APS 110 (Attachment A, paragraph 3) and summarised below.

Table 8. Simplified capital ratio requirements and how they compare

Total RWA is the sum of	Non-SFIs	SFI (Standardised)	SFI (IRB)
Credit	APS 112	APS 112	APS 113 ¹⁶
Securitisation	APS 120	APS 120	APS 120
Counterparty credit	-	APS 180	APS 180
Operational	10 per cent of credit and securitisation RWAs	APS 115	APS 115
Market	-	APS 116	APS 116
IRRBB	-	-	APS 117

51. Non-SFIs are also excluded from certain other capital requirements, as set out in the table below. APRA may remove the exclusion for one or more risk areas, where it deems that it is necessary to do so based on the nature and risk of the non-SFI's business.

Table 9. Exemptions and reduced requirements

Risk area	Excluded or reduced requirement	Relevant standard
Operational Risk	10 per cent of credit and securitisation RWAs	APS 115
Counterparty credit risk (CCR)	No counterparty credit risk capital requirements or reporting requirements under <i>Reporting Standard ARS 180.0 Counterparty Credit Risk</i> (ARS 180.0).	APS 180
Interest rate risk in the banking book	No specific risk management requirements, with some reporting requirements.	APS 117

¹⁶ An IRB ADI may determine RWA in accordance with APS 112 for those asset classes where it is required to use the standardised approach or where APRA has approved partial use.

Risk area	Excluded or reduced requirement	Relevant standard
Leverage ratio	No leverage ratio requirement under APS 110 or reporting under ARS 110.0.	APS 110, Attachment D
Disclosures	Centralised disclosures of key metrics by APRA on behalf of ADIs.	APS 330

Chapter 4 - IRB Capital floor

This section provides guidance on APS 110 Attachment A (paragraph 4).

52. IRB ADIs must calculate and meet a capital floor for their IRB RWAs as a proportion of Standardised RWA, at Level 1 and Level 2. The aim of the floor is to ensure that the IRB and Standardised approaches do not excessively diverge.
53. An IRB ADI's total RWA is the greater of its total RWA calculated under the IRB approach and 72.5 per cent of the total RWA calculated under the standardised approach. That is, an IRB ADI's RWA requirements cannot fall below 72.5 per cent of total RWA calculated under the standardised approach.
54. The capital floor applies at the aggregate RWA level and not at an asset class level. The figure below illustrates the components of the capital floor.

Figure 2. Components of the IRB capital floor



Credit Risk includes Counterparty Credit Risk, Credit Valuation Adjustment and Securitisation.

55. As set out in the table below, for some risk areas the numerator and denominator would be the same.

Table 10. IRB floor calculation

Floor calculation	Credit		Operational risk	Market risk	IRRBB
Numerator (IRB)	APS 113 ¹⁷	APS 120, APS 180	APS 115	APS 116	APS 117
Denominator (Standardised)	APS 112	APS 120, APS 180	APS 115	APS 116 ¹⁸	-
Method	IRB/ Standardised	Standardised/ Standardised	Standardised/ Standardised	IRB/ Standardised	IRB/ -

56. For the exposures of a banking subsidiary in New Zealand, an IRB ADI must use the rules prescribed by the Reserve Bank of New Zealand to determine its RWA under APS 112 and APS 113 for the purposes of the floor calculation.
57. Table 11 provides an illustrative example of the calculation of the capital floor by an IRB ADI. In this example, the IRB ADI's total RWA under the IRB approach is 71 per cent of its total RWA calculated under the standardised approaches. This is less than the capital floor of 72.5 per cent so the IRB ADI must apply \$1327 (\$1830 x 72.5%) as its total RWA in calculating its risk-based capital ratios.

Table 11. Example calculation of the capital floor

Risk area	IRB approaches (\$RWA)	Standardised approaches (\$RWA)
Credit risk	1,050	1,600
Operational risk	180	180
Market risk	40	50
IRRBB	30	
Total RWA	1,300	1,830
IRB RWA / Standardised RWA		71%
Total RWA to be applied		1,327 (72.5%*1,830)

¹⁷ Certain portfolios may be treated as Standardised under the IRB approach, and the credit risk RWA would be the same for the numerator and denominator (such as margin lending).

¹⁸ Under paragraph 5 of Attachment A to APS 110, during a transitional period, the capital charge for market risk would be the same for the numerator and denominator for an IRB ADI that uses an internal model approach to determine its market risk capital charge. This applies until 1 January 2025.

Chapter 5 - Leverage ratio

This section provides guidance on APS 110 Attachment D.

58. An IRB ADI must maintain a minimum leverage ratio of 3.5 per cent, calculated as Tier 1 Capital divided by an exposure measure. The purpose of the leverage ratio is to complement the risk-based capital framework by limiting the overall leverage on an ADI's balance sheet. The table below sets out the calculation.

Table 12. Leverage ratio

Ratio	Numerator	Denominator
Definition	Tier 1 Capital	Exposure measure
Components	Tier 1 Capital	<ul style="list-style-type: none">On-balance sheet exposuresNon-market related off-balance sheet exposuresDerivative exposuresSecurities financing transaction exposures

59. For the purposes of calculating the exposure measure, an ADI must follow Australian Accounting Standards, subject to certain conditions specified in APS 110 (Attachment D, paragraph 2).

On-balance sheet exposures

60. An ADI must include all balance sheet assets in calculating the exposure measure for its on-balance sheet exposures. This includes any on-balance sheet collateral for derivatives and SFTs, but excludes on-balance sheet derivatives and SFTs covered by the treatment for derivative exposures specified in APS 110 (Attachment D).
61. Where an underlying asset being leased is a tangible asset, APRA expects an ADI to include a right of use asset in its Tier 1 Capital and exposure measure calculation for the leverage ratio. This appropriately reflects the economics of leasing transactions, including both the lessee's obligation to make future lease payments, as well as a right of use asset reflecting the lessee's control over the leased item's economic benefits during the lease term.
62. An ADI is expected to treat long settlement transaction and failed trades according to their accounting classification. For example, in calculating the exposure measure,
- if a long settlement transaction is classified as a derivative according to the Australian Accounting Standards, an ADI must apply the treatment for derivatives specified;

- b) if a failed trade is classified as a receivable according to the Australian Accounting Standards, an ADI must apply the treatment for on-balance sheet exposures; or
- c) if securities financing transaction have failed to settle, an ADI must apply the treatment for securities financing transaction exposures.

Non-market related off-balance sheet exposures

63. For the purpose of calculating non-market-related off-balance sheet exposures, an ADI must apply credit conversion factors (CCFs) to the gross notional amounts of off-balance sheet items. Off-balance sheet items have the same meaning as in APS 112.

Derivative exposures

Treatment of related collateral

64. An ADI must calculate its exposures associated with all derivative transactions. In doing so, an ADI must not reduce its exposure measure by the amount of any derivatives collateral received from a counterparty, unless the conditions for treating the cash variation margin in paragraphs 23 and 24 of Attachment D to APS 110 are met. This means that an ADI cannot reduce the replacement cost by collateral received and that the multiplier is fixed at one for the purpose of the potential future exposure calculation under APS 110 (Attachment D, paragraph 20). However, the maturity factor in the potential future exposure (PFE) add-on calculation can recognise the PFE-reducing effect from the regular exchange of variation margin
65. An ADI may reduce its exposure measure by treating the cash portion of variation margin exchanged between counterparties as a form of pre-settlement payment. Cash variation margin exchanged on the morning of the subsequent trading day, based on the previous end-of-day market values, would meet the condition that variation margin is calculated and exchanged on a daily basis, based on mark-to-market valuation of derivative positions.

Treatment of clearing services

66. If an entity falls outside of the Level 2 group of the ADI acting as a clearing member, then that entity would be considered a client and the treatment in APS 110 (Attachment D, paragraphs 25-27) would apply.

Additional treatment for written credit derivatives

67. Under APS 110 (Attachment D, paragraph 30), a written credit derivative refers to a broad range of credit derivatives through which an ADI effectively provides credit protection, and is not limited solely to credit default swaps and total return swaps. This includes, for example, all options where an ADI has the obligation to provide credit protection under certain conditions qualify as written credit derivatives.
68. The effective notional amount of such options sold by the ADI may be offset by the effective notional amount of options by which the ADI has the right to purchase credit

protection which satisfies the conditions set out in APS 110 (Attachment D, paragraph 33).

69. An ADI may reduce the effective notional amount of a written credit derivative by any negative change in the fair value amount that has been incorporated into the calculation of Tier 1 Capital with respect to the written credit derivatives. The effective notional amounts included in the exposure measure may be capped at the level of the maximum potential loss, which means that the maximum potential loss at the reporting date is the notional amount of the credit derivative minus any negative fair value that has already reduced Tier 1 Capital.¹⁹
70. An ADI may reduce the effective notional amount through the application of offsetting purchased credit derivatives if the conditions in APS 110 (Attachment D, paragraph 33) are met. For the purposes of offsetting:
- a) when a purchased credit derivative transaction exists, the effective notional amount of the written credit derivative may be reduced by any negative change in fair value reflected in Tier 1 Capital, provided that the effective notional amount of the offsetting purchased credit derivative is also reduced by any resulting positive change in fair value reflected in Tier 1 Capital; and;
 - b) when a purchased credit derivative transaction exists, and the effective notional amount of the purchased credit derivative has not been reduced by any resulting positive change in fair value reflected in Tier 1 Capital, then the effective notional amount of the written credit derivative may only be offset if the effective notional amount of that written credit derivative has not been reduced by any negative change in fair value reflected in Tier 1 Capital.
71. An ADI can meet the condition in APS 110 (Attachment D, paragraph 33(a)) that the credit protection purchased is otherwise subject to the same or more conservative material terms as those in the corresponding written credit derivatives if the strike price of the underlying purchased credit protection is equal to or lower than the strike price of the underlying sold credit protection.
72. The application of the same material terms condition under APS 110 (Attachment D, paragraph 33(a)) would result in the following treatments:
- a) for single name credit derivatives, the credit protection purchased through credit derivatives is on a reference obligation which ranks *pari passu* with or is junior to the underlying reference obligation of the written credit derivative. Credit protection purchased through credit derivatives that references a subordinated position may offset written credit derivatives on a more senior position of the same reference

¹⁹ For example, if a written credit derivative had a positive fair value of 20 on one date and has a negative fair value of 10 on a subsequent reporting date, the effective notional amount of the credit derivative may be reduced by 10. The effective notional amount cannot be reduced by 30. However, if on the subsequent reporting date the credit derivative has a positive fair value of five, the effective notional amount cannot be reduced at all.

entity as long as a credit event on the senior reference asset would result in a credit event on the subordinated reference asset; and

- b) for tranching products, the credit protection purchased through credit derivatives must be on a reference obligation with the same level of seniority.
73. One condition in APS 110 (Attachment D, paragraph 33(c)) is that the credit protection purchased through credit derivatives is not purchased from a counterparty whose credit quality is highly correlated with the value of the reference obligation. In making this determination, there does not need to be a legal connection between the counterparty and the underlying reference entity.
74. If an ADI writes credit protection through a credit derivative for a client, and enters into a back-to-back trade with a central counterparty whereby it purchases credit protection through a credit derivative on the same name, the purchased credit protection may be used to offset the written protection for the purposes of the leverage ratio. That is, an ADI may offset the effective notional amount of a written credit derivative sold to a client by means of a credit derivative on the same underlying name purchased from a central counterparty, provided that the criteria in APS 110 (Attachment D, paragraphs 32 and 33) are met.
75. APS 110 (Attachment D, paragraph 34) requires that credit protection purchased through a credit derivative on a pool of reference assets cannot offset a written credit derivative, unless both instruments reference the same pool of reference assets and the level of subordination of both transactions is identical. Tranching junior position hedges through credit derivatives that meet the following criteria would not be eligible for offsetting:
- a) the junior and senior tranches are on the same pool of reference entities;
 - b) the level of seniority of the debt of each of the reference entities in the portfolio is the same;
 - c) the designated credit events for the credit protection sold on the senior tranche, and purchased on the junior tranche, are the same; and
 - d) the anticipated economic recovery on the junior tranching protection purchased is equal to or greater than the anticipated economic loss on the senior tranching protection sold.

Securities financing transaction exposures

76. APS 110 (Attachment D, paragraph 43) sets out how an ADI that is acting as an agent in a securities financing transaction (SFT) must calculate its exposure measure for this transaction.
77. One requirement is that an ADI must include a further exposure equal to the full amount of the security or cash in its exposures measure where the ADI is further economically exposed to the underlying security or cash in the SFT. This may be, for example, due to the ADI managing collateral received in the ADI's name or on its own account, rather than on the customer's or borrower's account (such as by on-lending or managing unsegregated collateral, cash or securities). However, this does not apply to client

omnibus accounts that are used by agent lenders to hold and manage client collateral, provided that client collateral is segregated from the bank's proprietary assets and the bank calculates the exposure on a client-by-client basis.



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