

Citibank Singapore Limited
Registration Number: 200309485K

Pillar 3 Disclosure
Year ended 31 December 2015

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1. Introduction

Citibank Singapore Limited (“CSL” or the “Bank”) is incorporated in the Republic of Singapore and has its registered office at 8 Marina View, #21-00 Asia Square Tower 1, Singapore 018960. The Bank operates in Singapore under a full bank licence with an Asian Currency Unit and Qualifying Full Bank privileges granted by the Monetary Authority of Singapore (“MAS”). The immediate holding company of the Bank is Citigroup Holding (Singapore) Private Limited, which is incorporated in Singapore. The Bank’s ultimate holding company is Citigroup Inc. (“Citigroup”), which is incorporated in the United States of America.

As at end of 2015, the Bank is accessible to its customers at more than 1,500 touch points, including 23 branches, 227 Citibank ATMs and close to 200 units under the ATM5 shared network.

The Capital Requirements Directive (CRD), often referred to as Basel III, introduced the need for banks operating under this new legislative framework to publish certain information relating to their risk management and capital adequacy. The disclosure of this information is known as Pillar 3 and is designed to complement the other two pillars of the Basel III, namely the minimum capital requirements (Pillar 1) and the supervisory review process (Pillar 2). This disclosure has been prepared in accordance with MAS Notice No. 637 which came into effect on 1 January 2008.

Since 2008, CSL has adopted Standardised Approach (“SA”) for Credit Risk, Basic Indicator Approach (“BIA”) for Operational Risk and Standardised Approach (“SA”) for Market Risk. The adoption of Advanced-Internal Risk Based Approach (“A-IRBA”) for Credit Risk, Advanced Measurement Approach (“AMA”) for Operational Risk and Internal Models Approach (“IMA”) for Market Risk by CSL will be dependent on state of readiness of adoption by Citigroup and other relevant considerations.

This Pillar 3 disclosure should be read in conjunction with Citibank Singapore Limited’s Financial Statements for the financial year ended 2015.

2. Corporate Governance

A sound risk management process, strong internal controls and well documented policies and procedures are the foundation for ensuring the safety and soundness of the Bank. The Bank’s board of directors (“Board”) and senior management team (“Senior Management”) ensure that capital levels are adequate for the Bank’s risk profile. They also ensure that the risk management and control processes are appropriate in light of the Bank’s risk profile and business plans.

The Bank has put in place a risk management system, which leverages in part the risk management framework developed by Citigroup, to oversee and monitor material risks faced by the Bank, including credit, market and operational risks. CSL’s Audit Committee assists the Board in overseeing financial, legal, compliance, operational risks and information technology controls and is supported by the Bank’s internal audit, operational risk management, legal and compliance functions. The Audit Committee reviews significant control and compliance related matters and the audit findings of the compliance and internal audit functions at its quarterly meetings, including management’s response to the audit findings and progress of the related corrective action plans. The Senior Management, Audit Committee and relevant staff will update the Board during its quarterly meetings about pertinent operational, legal and compliance risk management issues which have arisen during the quarter.

The Bank has a Risk Management Committee, which together with the Audit Committee and Senior Management assists the Board in fulfilling its oversight responsibility relating to the establishment and operation of an enterprise-wide risk management system.

In recognition of the fact that internal controls are merely one aspect of risk management, the Bank has a Risk Management Engagement Framework (“Framework”) which sets out the scope and responsibilities of the Audit Committee and Risk Management Committee in overseeing internal controls and risk and to describe the terms of engagement between both committees.

The Framework comprises the risk management terms of reference (“TORs”) framework (i.e. the TORs of the Risk Management Committee and the Audit Committee) and the risk management engagement framework (i.e. how both committees will engage with each other, management and the Board in the oversight of enterprise risk). Under the TORs of the Risk Management Committee, the Risk Management Committee has oversight of the establishment and operation of an independent risk management system for managing risks on an enterprise-wide basis. Coverage of internal controls has been specifically delegated by the Board to the Audit Committee which, under its TORs, also has oversight of significant financial reporting issues; the internal audit function; and the scope/results of the external audit. Under its TORs, the Board approved the overall regulatory policies and risk appetite framework for the Bank.

The terms of engagement between the Audit Committee and the Risk Management Committee are described in the Framework to set out the roles and responsibilities of each committee. The quarterly Audit Committee meetings are scheduled just before the quarterly Risk Management Committee meetings. At the quarterly Audit Committee meetings, the Chief Financial Officer provides a summary of quarterly assessment on internal controls. The Risk Management Committee receives updates at its quarterly meeting on matters discussed during the immediately preceding Audit Committee meeting and a summary from the Consumer Credit Risk Manager, including a forward-looking assessment of any potential or emerging risks, particularly in terms of the top strategic and material risks monitored by the Risk Management Committee on an ongoing basis. These emerging risks are in turn communicated back to the Audit Committee for the Audit Committee to determine any incremental controls needed. The Audit Committee and Risk Management Committee Chairpersons will then brief the Board at the quarterly Board meetings on the highlights of their respective committee discussions.

Underpinning the TORs and engagement between the two committees are three lines of defence – the first layer being business management (i.e. the Business Heads, In-Business Control and Operations), the second layer being the risk and control functions (Legal, Compliance, Finance, Operational Risk Management, Credit Risk, Liquidity Risk, Market Risk and Fundamental Credit Risk) and the third layer being internal and external audit.

At each quarterly Audit Committee and Risk Management Committee meeting, a quarterly Summary of Internal Control Assessment and a Summary of Risk Assessment are provided respectively to the Audit Committee and the Risk Management Committee. These summaries draw on the work done, issues raised and findings made under the three lines of defence during the preceding quarter.

The Framework assists the Board in having a holistic view of enterprise risk management across the Bank.

3. Capital Structure and Capital Adequacy

The Bank’s capital management is designed to ensure that it maintains sufficient capital consistent with the Bank’s risk profile and all applicable regulatory standards and guidelines. The Bank adopts a balanced approach in risk taking, balancing Senior Management and Board’s oversight with well-defined independent risk management functions. The Board engages Senior Management regularly in key activities that may impact capital assessment and adequacy.

Other than paid-up capital of the Bank, CSL’s capital is historically generated via retained earnings from the business.

3.1. Capital Management

(in S\$million)	Basel III 2015	Basel III 2014
1 Tier 1 Capital		
Paid-up ordinary share capital	1,528	1,528
Disclosed reserves ¹	2,268	2,189
Total regulatory adjustments to Common Equity Tier 1	-	-
Regulatory adjustments due to insufficient Tier 1 Capital	(1)	(1)
Common Equity Tier 1 capital	3,795	3,715
2 Tier 2 Capital		
General provisions	104	75
Net Tier 2 capital	104	75
3 Total eligible capital	3,899	3,790
Risk Weighted Assets	17,600	17,326
Common Equity Tier 1 capital adequacy ratio	21.56%	21.44%
Tier 1 capital adequacy ratio	21.56%	21.44%
Total capital adequacy ratio	22.15%	21.88%

Note

¹ Disclosed reserves comprises translation reserves, statutory reserves and accumulated profits

Pursuant to section 9 of the Banking Act (Cap 19) of Singapore, the Bank is required to maintain a paid-up capital and capital funds of not less than \$1,500,000,000. The Bank's capital fund is the aggregate of its paid-up capital and published reserves, which includes foreign currency translation reserve, statutory reserve and accumulated profits.

In 2007, MAS approved the Bank's application to adopt the Basel II Standardised Approach with effect from 1 January 2008 for computing its regulatory capital requirements. The Bank's capital adequacy ratio ("CAR") is computed in accordance with MAS Notice to Banks No. 637. The Basel III capital adequacy requirements apply with effect from 1 January 2013.

At the end of 2015, CSL's Common Equity Tier 1 capital adequacy ratio and Tier 1 capital adequacy ratio is 21.56% (2014: 21.44%) and total capital adequacy ratio is 22.15% (2014: 21.88%).

The above ratios are well above the regulatory requirements for Common Equity Tier 1, Tier 1 and total capital adequacy of 5.5%, 8% and 10% respectively.

3.2. Risk Weighted Assets (RWA)

The following tables detail the classes of RWA and the types of credit exposure of the Bank as at 31 December 2015:-

1. Credit RWA		(S\$ million)
	Standardised Approach for Credit Risk [SA (CR)]	Total Credit RWA
i)	Cash and Cash Equivalents	-
ii)	Central Governments and Central Banks Asset Class	-
iii)	Public Sector Entity Asset Class	42.27
iv)	Multilateral Development Bank Asset Class	-
v)	Bank Asset Class	5,205.66
vi)	Corporate Asset Class	5.64
vii)	Regulatory Retail Asset Class	3,833.56
viii)	Residential Mortgage Asset Class	3,233.79
ix)	Commercial Real Estate Asset Class	6.48
x)	Other Exposures Asset Class	2,583.09
Total Credit RWA under SA (CR)		14,910.49
Total Credit Valuation Adjustment (CVA) RWA		10.37
Total Credit RWA		14,920.86

2. Market RWA				in S\$ million
Market Risk Type	Specific Risk	General Market Risk	Additional Capital Charge for Options	Total Capital Requirement
Interest Rate Risk	3.39	1.24	-	4.63
Equity Risk	-	-	-	-
Foreign Exchange Risk	-	1.01	1.96	2.97
Commodity Risk	-	-	-	-
Total Capital Requirement under SA(MR)	3.39	2.25	1.96	7.60
Market RWA under Standardised Approach for Market Risk [SA (MR)] = A*12.5				94.96

3. Operational RWA		(S\$ million)
Operational Risk Capital Requirement		206.77
Total Operational RWA (=B*12.5)		2,584.60

4. Risk Categorization

To assess adequacy of the Bank's capital to support its current and future activities, the Bank has identified material risks applicable to CSL's lines of business.

The material risks identified are Credit Risk, Operational Risk, Market Risk, Interest Rate Risk in the Banking Book ("IRRBB"), Liquidity Risk, Business & Strategic Risk, Reputation Risk and Model Risk.

CSL defines these material risks as follows:

4.1. Credit Risk

Credit risk is the risk to earnings or capital arising from an obligor's failure to meet the terms of any contract with the Bank or an obligor's failure to perform as agreed. Credit risk also arises in conjunction with a broad range of the Bank's activities, including selecting investment portfolio products, derivatives trading partners, foreign exchange counterparties, country or sovereign exposure, as well as indirectly through guarantor performance.

4.1.1 Credit Risk Management Policy

The Bank's credit risk management process relies on corporate-wide standards to ensure consistency and integrity, with business-specific policies and practices to ensure applicability and ownership.

For the Consumer/Retail portfolio, credit risk is governed by local regulatory requirements, the Global Consumer Credit and Fraud Risk Policy ("GCCFRP") and local product specific Business Credit Policy & Procedure Manual ("BCPPM"). Credit authority levels, credit delegation process, approval processes for portfolios categorization, product and transaction approvals, and other types of required approvals, as well as, appointment of credit officers and their responsibilities are defined in these policy documents.

For the Commercial portfolio, credit risk is governed by the Global Commercial Credit Policy ("GCCP").

In addition to compliance with the global credit risk policies, CSL also complies with MAS Notice No. 612 on credit grading of facilities where loans are graded into Pass, Special Mention, Substandard, Doubtful and Loss.

4.1.2 Impairment Allowances policy

The Bank complies with Singapore Financial Reporting Standards ("FRS") as required by the Companies Act, Chapter 50 ("Companies Act"). In accordance with Section 201(19) of the Companies Act, the requirements of FRS39 Financial Instruments: Recognition and Measurement in respect of loan loss provisioning have been modified by the requirements of Notice to Banks No 612 'Credit Files, Grading and Provisioning' ("MAS 612") issued by the MAS.

Specific impairment allowance for unsecured loans is made on the carrying amount according to loan delinquency. Specific impairment allowance for secured loans is made on excess of carrying amount over market value of collateral, according to loan delinquency. Secured loans are generally collateralized by securities, properties and motor vehicles. Market prices of securities are monitored periodically to identify shortfalls in collateral values against loan carrying amounts.

Collective impairment allowance is determined based on the Straight Rate to Write-off ("SR-0") methodology with a 12 months Forward Looking Credit Loss Adjustment. The SR-0 method computes Loan Loss Reserve ("LLR") required for loans and advances as at 31 December 2015 based on the flow rate. In addition there is consideration for adjustments that may be required for observable market data indicating potential future deterioration of credit condition. Further adjustments may also be managed using Expected Loss computed based on Basel III.

With the internal LLR impairment assessment methodology, the Bank has a process to ensure that the LLR is adequate to meet the requirements under MAS Notice No. 612.

Details of specific and collective impairment allowances and non-performing credit facilities as well as reconciliation of changes in the allowance for loan impairment are disclosed in Notes 16 and 17 of the Bank's financial statements.

4.1.3 Credit Risk Assessment and allowances

Credit risk assessment is performed as follows:

A) Retail Portfolio

The target markets for retail lending are individual borrowers. Key retail lending products are mortgage loan, credit card facility, revolving credit facility and margin lending facility.

There is an established set of measures, procedures, and policies for monitoring the performance of the retail asset portfolios. This is done through a monthly Portfolio Quality Review ("PQR") covering the following key areas:

- Leading indicators (including macroeconomic indicators), new booking characteristics, test programmes, significant credit changes, portfolio classified as "Performance Exception" and portfolio performance indicators (delinquencies, net flows, credit losses). Where applicable, results are compared against historical performance and/or plan/benchmarks

- Monitoring of limits stipulated in approved programmes
- Concentration limits/caps for high risk segments
- Test programmes & Significant Credit Change tracking
- Deviation rates and related performance of exceptions approved
- Reporting Key Risk Indicators (“KRI”) if benchmarks are triggered and actions are taken, where applicable. KRIs include tripwires identified during the annual stress tests
- Keeping an inventory of credit changes made. For significant credit changes, performance against benchmarks is tracked for 12 months

Depending on the product, either Number of Payments Missed or Day Past Due (“DPD”) is used by CSL to assess the level of individual impairment allowance required. Details of Number of Payments Missed bucket for Mortgage Loans are as follows:

Number of Payments Missed	Classification (MAS 612)
0 – 1	Pass
2 – 3	Special Mention
4	Substandard
5 – 6	Doubtful
≥ 7	Loss
PDO ¹ Account < 4	Substandard
PDO Account ≥ 4	As per number of payments missed
Rewrite < 4	Substandard
Rewrite ≥ 4	As per number of payments missed

For loans with underlying collaterals, there is a split classification and methodology for accounts falling under the substandard, doubtful and loss classification.

For Ready Credit and Credit Cards:

Number of Payments Missed	Classification (MAS 612)
0 – 1	Pass
2 – 3	Special Mention
4	Sub Standard
6-May	Doubtful
≥ 7	Loss
Rewrite + RAS (0 – 3)	Substandard
Rewrite + RAS (4)	Doubtful
Rewrite + RAS (≥ 5)	Loss
Settlement (0 – 3)	Substandard
Settlement (4 – 6)	Doubtful
Settlement (≥ 7)	Loss
Blk B (0 – 3)	Substandard
Blk B (4 – 6)	Doubtful
Blk B (≥ 7)	Loss

For Auto and Education Loans:

Number of Payments Missed	Classification (MAS 612)
0 – 1	Pass
2	Special Mention
3	Substandard
4	Doubtful
≥ 5	Loss
PDO Account < 4	Substandard
PDO Account ≥ 4	As per number of payments missed

¹ Past Due Obligation (“PDO”)

Facilities secured by cash, mutual funds, fixed income securities, shares:

DPD (Citibank)	Classification (MAS 612)
0-29	Pass
30-59	Special Mention
60-89	Substandard
90-119	Doubtful
>=120	Loss

Credit Risk Mitigation (CRM)

For the purpose of calculating and assessing Net Credit RWA, the Bank takes into account eligible collateral pledged by customers that are primarily cash deposits, mutual funds, fixed income securities and shares.

The Bank's Credit Operations Department is guided by its Credit Policy and Procedures for collateral valuation and management. It marks to market the CRM eligible financial collateral value on a daily, weekly and monthly (whichever is applicable) basis. Margin call and force sell actions will take place if the Quantum of Financing ("QOF") is higher than that prescribed in the Credit Policy. Trade will be rejected if the QOF reaches margin call or force sell status.

As the end of December 2015, the Bank's gross credit exposure (excluding CVA) is S\$36 billion, of which S\$3.0 billion is offset by CRM in the retail assets portfolios. After applying the required risk weights, the Bank's Credit RWA is S\$14.91 billion. Given the immateriality of CRM, which is 8.33% of total credit exposure, asset class breakdowns are not provided and for the same reason, there is no CRM risk concentration exposure to the Bank.

Twelve month forecasts of portfolio performance are carried out as part of the annual budget process. This process includes a review of volume growth, expected losses and reserves and related profitability, and is subject to the independent review and concurrence of the Regional and Global Risk Management Office, Business and Finance. Once the forecasts are approved, they are used as credit benchmarks to monitor performance of the portfolio in the following financial year.

Large consumer portfolios are subject to annual business stress testing, where the major asset product portfolios are put through a set of generated stress scenarios to determine their loss absorption capacity.

B) Commercial Portfolio

Target markets for commercial lending are companies with turnover of US\$10 million and below. Credits with total approved limit of US\$1million and below are delinquency managed (retail reporting) while credits with total approved limit of more than US\$1million remains classifiably managed (wholesale reporting).

The GCCP documents the core credit policies for identifying, measuring, approving and reporting credit risk for commercial lending under the delinquency and classifiably managed process.

Within the risk framework of the GCCP, CSL's Small Enterprises credit risk management is outlined in greater detail in the Business Credit Program ("CP"), which is developed locally to incorporate applicable local regulations, market practices and environment and processes for approving and managing the risks of the portfolio. There is an established monitoring and review process through portfolio limits, caps and triggers. Portfolio reviews are conducted monthly, and quarterly portfolio reviews are conducted with senior management in the region and global office. The Small Enterprises Wholesale Portfolio constitutes only 0.08% of the total RWA for Credit Risk. As such, Concentration Risk, Cross Border Risk and Residual Risk are deemed immaterial for this portfolio.

To assess the allowance of Commercial Lending Portfolio, the following classification is used in accordance with the Bank’s internal Credit Policy and MAS Notice No. 612:

Delinquency Managed - Number of Missed Payments	Classifiably Managed -Classification	Classification (MAS 612)
0-1	Pass	Pass
2	Special Mention	Special mention
3	Substandard Performing / Non-Performing	Substandard
NA	Doubtful	Doubtful
4	Loss	Loss

C) Treasury Portfolio Credit Risk

The Corporate Treasury and Integrated Foreign Exchange and Fixed Income (“CTFX”) business through its activities manages the funds of the businesses that it supports. The credit risk evaluation for CTFX placements is as follows:

- **Third Party Placements**

All approval of limits for third party placements is carried out centrally by the Global Risk Management unit. Each counterparty limit is determined globally and allocated to each country. This process ensures that Citigroup’s global exposure is centrally aggregated and controlled. Prior to making any third party placements, CTFX checks to ensure that there are limits available for the transactions. The Risk Management Unit monitors the placements with counterparties to ensure that they are within the limits allocated.

A daily monitoring process is also in place to check for compliance with exposure limits to single counterparty groups. A figure of 20% of capital funds is used as the internal trigger in addition to compliance with the regulatory limit of 25% of capital funds.

- **Inter-Company**

Pursuant to the banking licence granted by MAS, CSL is required to maintain its net inter-company exposure in accordance to the target ratio specified by MAS. The net inter-company exposure is monitored on a daily basis. Inter-company exposure is also monitored to ensure adequate capital is maintained at all times.

4.1.4 Credit Ratings of External Credit Assessment Institution (ECAI)

In terms of assessing counterparty credit risk, the rating services of Moody’s Investors Service and Standard & Poor’s are selected as CSL’s approved ECAI for providing credit ratings. ECAI is used in the Bank’s Wholesale and Treasury portfolios.

The Bank uses an internally developed system to calculate its risk weighted assets and this system receives its external ratings from a credit system that has a feed for external ratings from the approved ECAI.

The alignment of the alphanumeric scale of each recognized ECAI used by CSL with relevant risk weights are detailed in the table below:

Credit Ratings and Credit Quality Grade

Rating Agencies		Credit Ratings						
Moody's Investor Services		Aaa					Caa1	
		Aa1	A1	Baa1	Ba1	B1	Caa2	
		Aa2	A2	Baa2	Ba2	B2	Caa3	
		Aa3	A3	Baa3	Ba3	B3	Ca	
							C	
Standard & Poor's		AAA					CCC+	
		AA+	A+	BBB+	BB+	B+	CCC	
		AA	A	BBB	BB	B	CCC-	
		AA-	A-	BBB-	BB-	B-	CC	
							D	
Basel Credit Ratings		AAA	A+	BBB+	BB+	B+	CCC+	
Credit Quality Grade		1	2	3	4	5	6	Unrated
Basel Asset Class - Bank	<= 3 months	20%	20%	20%	50%	50%	150%	20%
	>3 months	20%	50%	50%	100%	100%	150%	50%
Basel Asset Class - Corporate	<= 3 months	20%	50%	100%	100%	150%	150%	100%
	>3 months	20%	50%	100%	100%	150%	150%	100%
Original Maturity Date		Risk Weight Applied						

4.1.5 Credit Risk Exposure Disclosure

- Gross Credit exposure**

The gross credit exposures of the Bank is represented by the maximum exposure to credit risk for balance sheet and off-balance sheet financial instruments, before taking into account any collateral held or other credit enhancement at the balance sheet date. Gross credit exposures and residual contractual maturity breakdown can be found in Note 31 of the Bank's financial statements.

Average gross credit exposure is used for analysis purposes only. The monthly average balance is the common method used for analysis. As average gross credit exposures are not used to determine the maximum credit exposure to the Bank, they are not disclosed.

- Geographic and Industry Breakdown**

Geographic distribution of the Bank's major credit exposure is disclosed in Notes 14 to 16 of the Bank's financial statements while industry distribution is disclosed in the 'Industry Analysis' section of Note 31.

Individual and collective impairment allowance by major industry is also disclosed in Note 31 of the Bank's financial statements.

Further disclosures are as follows:

- Classified Exposure - by Major Industry**

Industry	Amount (S\$million)
Professional & Private Individuals	185
Housing	10
Total	195

- **Classified Exposure - by Geographical Location**

Country	Amount (S\$million)
Singapore	195
Indonesia	0
Others	0
Total	195

- **Past due loans under MAS612 – by Major Industry**

Past Due Loans (>90 dpd)	Amount (S\$million)
Professional & Private Individuals	19
Housing	0
Total	19

- **Past due loans under MAS 612 – by Geographical Location**

Past Due Loans (>90 dpd)	Amount (S\$million)
Singapore	19
Others	0
Total	19

- **Individual impairment allowance – by Geographical Location**

Industry	Amount (S\$million)
Singapore	0
Others	0
Total	0

- **Charges for individual impairment allowance and charge-offs – by Major Industry**

Industry	Amount (S\$million)
Professional & Private Individuals	0
Total	0

Note: Collective impairment allowance is done on a total portfolio basis, thus breakdown by geography and industry is not available.

- **Asset Class Breakdown by Risk Weights after CRM, under SA(CR):**

	Risk Weights	Asset Class	Net Exposure/ Notional (S\$million)	Credit RWA (S\$million)
i)	0%	Cash Items	130.93	-
		Central Government & Central Government Exposure	3,530.12	-
		Multilateral Development Bank Exposure	-	-
		Public Sector Entities Exposure	304.06	-
ii)	20%	Cash Items - Cheques and other items in processing	-	-
		Public Sector Entities Exposure	211.34	42.27
		Banking Institutions Exposure - On Balance Sheet	4,083.38	816.68
		- Off Balance Sheet	14.77	2.95
		- OTC	26.84	5.37
		Corporate Exposure - OTC	0.40	0.08
iii)	35%	Exposures secured by Residential Property - On Balance Sheet	7,228.50	2,529.98
		- Off Balance Sheet	150.91	52.82
iv)	50%	Banking Institutions Exposure - On Balance Sheet	8,758.94	4,379.46
		- Off Balance Sheet	-	-
		- OTC	2.39	1.20
		Corporate Exposure - OTC	0.05	0.03
v)	75%	Regulatory Retail Exposure - Individuals	5,024.06	3,768.05
		- Small Business	11.66	8.75
		- Off Balance Sheet	14.20	10.65
		Exposures secured by Residential Property - On Balance Sheet	701.75	526.31
		- Off Balance Sheet	129.44	97.08
vi)	100%	Corporate Exposure - On Balance Sheet	3.65	3.65
		- Off Balance Sheet	1.60	1.60
		- OTC	0.28	0.28
		Regulatory Retail Exposure - On Balance Sheet	0.01	0.01
		Exposures secured by Residential Property - On Balance Sheet	12.21	12.21
		- Off Balance Sheet	15.39	15.39
		Other Exposures Asset Class	2,583.09	2,583.09
		Commercial Real Estate Exposure - On Balance Sheet	6.48	6.48
		- Off Balance Sheet	-	-
vii)	150%	Regulatory Retail Exposure - On Balance Sheet	30.74	46.11
		Corporate Exposure - OTC	-	-
		Total	32,977.19	14,910.50

- **RWA based on assessments by recognized ECAI:**

ECAI	RWA (S\$ million)
Moody's Investors Service	496
Standard & Poor's	4,707
Total	5,203

4.1.6 Counterparty Credit Risk (“CCR”) and Over-the-counter (“OTC”) derivatives

Counterparty risk exposure is included in CSL’s economic capital model by converting the current and future potential exposure to a counterparty into a one-year loan equivalent, aggregated with other direct and indirect exposure, and allocating economic capital based on the perceived credit quality of the obligor.

The gross credit exposure for OTC derivative transaction is calculated under the current exposure method. This comprises both replacement cost (on balance sheet mark-to-market) and potential future exposure after taking a Credit Conversion Factor (“CCF”) on the derivative contract notional amount.

There are no collaterals, credit reserves or specific policy with respect to exposures that give rise to general or specific wrong-way risk.

The gross positive fair value of derivative transactions is disclosed in Note 6 of the Bank’s financial statements.

Credit exposures by type of OTC derivatives are detailed below:

	Foreign exchange (S\$million)	Interest (S\$million)	Equity (S\$million)	Total (S\$million)
Exposure at default (EAD)	209.92	-	0.92	210.84

4.2 Market Risk

Market risk encompasses liquidity risk and price risk, both of which arise in the normal course of business of a global financial intermediary. Liquidity risk is the risk that an entity may be unable to meet a financial commitment to a customer, creditor, or investor when due. Price risk is the earnings risk from changes in interest rates, foreign exchange rates, and equity and commodity prices, and in their implied volatilities. Price risk arises in both trading and non-trading portfolios.

Market risk is measured in accordance with established standards to ensure consistency across businesses and the ability to aggregate risk. Each business is required to establish, with approval from independent market risk management, a market risk limit framework for identified risk factors that clearly defines approved risk profiles, which is within the parameters of Citigroup’s overall risk appetite.

CSL is fully 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 Senior Management to implement Citigroup’s risk policies and practices, and respond to the needs and issues in the Bank.

In terms of internal controls, Market Risk Management, an independent group, oversees market and liquidity risks and ensures that the approved risk profile is consistent with CSL’s overall risk appetite. Price risk limits are approved by Market Risk Management and monitored on a daily basis. Limit excesses are highlighted to the Risk Management Committee of CSL.

In line with Basel III requirements, stress testing procedures are developed in response to business or market specific concerns and applied to all Trading/Accrual portfolios within a specific business, as appropriate. The stress tests are performed periodically on Trading and Accrual portfolios at a frequency required under the independent market risk limit framework, or at the discretion of Market Risk Management.

4.2.1 Interest Rate Risk Management

The Bank’s interest rate positions arise from treasury and consumer banking activities. Interest rate risk arises in both trading portfolios and non-trading portfolios. Interest rate risk arises primarily due to the timing differences in the re-pricing of interest-bearing assets and liabilities. It is also a result of positions from non-interest bearing liabilities including shareholders’ funds and current accounts, as well as from certain fixed rate loans and liabilities. Interest rate risk is managed by the Treasury Department through monitoring of limits approved by the Market Risk Management. The Bank also uses interest rate and foreign exchange swaps to manage interest rate risk.

As of 31 December 2015 the Bank's Market Risk Management estimated that the interest rate sensitivity of a general increase of 100 basis points in interest rates, with all other variables held constant, would increase the Bank's profit before tax by approximately S\$10,491,336, whereas a general decrease of 100 basis points in interest rates, with all other variables held constant, would have an equal but opposite effect.

The sensitivity analysis above has been determined assuming that the change in interest rates had occurred at the balance sheet date and had been applied to the exposure to interest rate risk for both derivative and non-derivative financial instruments in existence at that date and that all other variables, in particular foreign exchange rates, remain constant.

4.2.2 Interest Rate Risk in the Banking Book

Interest rate risk in the Banking Book arises from both interest bearing and non-interest bearing assets and liabilities. Interest rate risk is monitored on a daily basis within the approved limits framework set by the Market Risk Management. Assets and liabilities, which are contractual in nature, are monitored up to the repricing tenors. Non-interest bearing and perpetual products, e.g. current and saving accounts, credit cards and ready credit are monitored for interest rate risk on core / vector balances. The core / vector balances are computed based on statistical regression analysis and General Optimization Techniques.

Citi is implementing a new type of Interest Rate Risk Measurements with a new system of Ruby to incorporate the Net Interest Revenue forecast based on the cash-flow along with balance sheet and interest rate projection to supplement the current Gap based Interest Rate Risk Measurements.

Potential interest rate risk in the Banking Book is monitored through interest rate exposure at 100 basis points parallel move in interest rates. Interest rate exposure at each major currency level for the Banking Book is as follows:

Currency	+100bps Up Move (S\$million)
SGD	12.9
USD	0.4
GBP	0.0
CAD	-0.3
AUD	-0.1
EUR	-0.6
JPY	-0.7

4.2.3 Liquidity Risk

Liquidity in Singapore is managed at CLE (Country Legal Entity), as well as MLE (Material Legal Entity) level. CSL's liquidity management objective is to ensure that the Bank has adequate access to liquidity to meet all obligations as and when due, including under extreme but plausible conditions.

Consistent with Country Liquidity Management framework, liquidity risk management in CSL includes Funding and Liquidity Planning, Daily S2 reporting (Highly Stressed Market Disruption stress scenario), and the use of limits, triggers and stress testing. Liquidity is monitored and managed within a robust framework that includes review by the CSL Asset Liability Committee ("ALCO"), which consists of representation from all businesses with the CEO of CSL designated as the chairman of CSL ALCO. Key members of CSL ALCO also attend the Country ALCO.

In terms of internal control, under the Liquidity Risk Management Policy, there is a single set of standards for the measurement, reporting and management of liquidity risk in order to ensure consistency across businesses, stability in methodologies, and transparency of risk.

Details of market risk, interest rate sensitivity, foreign currency risk and liquidity risk analysis can be found in Note 31 of the Bank's financial statements.

4.3 Operational Risk

Operational Risk is the risk of loss resulting from inadequate or failed internal processes, systems, or human factors, or from external events. It includes reputation and franchise risks associated with Citi's business practices or market conduct. It also includes the risk of failing to comply with applicable laws, regulations, ethical standards, regulatory administrative actions or Citi policies.

Operational Risk does not encompass strategic risk or the risk of loss resulting solely from authorized judgments made with respect to taking credit, market, liquidity, or insurance risk.

CSL maintains an Operational Risk Management Framework with a Governance Structure to support its core operational risk management activities of anticipation, mitigation and recovery. To ensure effective management of operational risk across the Bank, the Governance Structure presents three lines of defense which are Business Management, Independent Control Functions, and Internal Audit.

The Framework establishes minimum standards for consistent identification, monitoring and reporting, measurement, and management of operational risks and supports the application of the operational risk capital model.

CSL implemented the Operational Risk Management (ORM) Policy and other related Standards and Tools (i.e. Manager's Control Assessment ("MCA"), Operational Loss Reporting etc.) and several escalation mechanisms related to operational risk. In line with Basel III requirements, CSL performs risk analysis on a regular basis to assess whether the minimum capital requirement for operational risk is adequate and adhered to.

The Business Risk, Compliance & Control Committee ("BRCC") governs operational risk in CSL. The Committee meets on a quarterly basis and provides direction on key operational risk issues according to a standard agenda. The CSL Audit Committee is the independent governing body monitoring operational risk within CSL.

The Bank uses the Basic Indicator approach for calculating Operational Risk Capital. The computation is set out in MAS Notice No. 637, Part IX division 2.

5. Remuneration

5.1 Remuneration of Employees

The Bank's remuneration policy is aimed at attracting and retaining talented individuals. The job scope and market factors are taken into account in determining the remuneration package for an employee. To ensure that the Bank remunerates its employees competitively and appropriately, the Bank regularly reviews its base salary ranges and benefits package using market data provided by recognized surveys of comparative groups in the financial sector in Singapore.

5.2 Financial Stability Board Principles of Sound Compensation Practices

In April 2009, the Financial Stability Board ("FSB") issued the Principles of Sound Compensation Practices ("FSB Principles"). In September 2009, the FSB issued implementation guidelines for the FSB Principles. The nine principles, which are intended to reduce incentives which encourage excessive risk taking, focus on three areas:

1. Effective governance of compensation;
2. Effective alignment of compensation with prudent risk taking; and
3. Effective supervisory oversight and engagement by stakeholders.

The FSB Principles are incorporated into the Corporate Governance Guidelines for Banks, Financial Holding Companies and Direct Insurers incorporated in Singapore issued by the MAS. The Bank has performed a self-assessment against the FSB Principles and has concluded that its remuneration policy and compensations practices are aligned with the FSB Principles.

5.3 Effective Governance of Compensation

5.3.1 Board Remuneration Committee

Citigroup has a remuneration policy which is applied in a consistent manner by its various businesses across the globe, including those operating in CSL (hereinafter referred to as “Global Remuneration Policy”).

As with other global policies, practices and procedures that are relevant to the businesses in CSL, the Board has been apprised by Senior Management of the Global Remuneration Policy and concurs with Senior Management’s proposal to adopt the Global Remuneration Policy for CSL. On at least an annual basis, the Board will review with Senior Management, the Bank’s remuneration policies, structure and procedures that follow the objectives of the Global Remuneration Policy. As part of such review, the Board has been provided information on matters including the objective of the Global Remuneration Policy, the role, responsibility and composition of global, regional and country committees established for the purpose of reviewing and approving remuneration structures and guidelines, and the review and approval processes involved in determining remuneration packages for the Bank’s employees such as Covered Employees and Senior Managers (as defined below). The Board reviewed the compensation plans and programs in October 2015 discussing the linkage to performance management of the CE2 and talent management needs and programs for CSL. As mentioned above, the Bank has conducted a self assessment of the Global Remuneration Policy adopted by the Bank against the FSB Principles and concluded that the Bank’s remuneration structure/practices and processes are broadly aligned to the FSB Principles. The Board reviewed the said self-assessment in June 2015.

5.3.2 Review and Evaluation of Incentive/Compensation Programs

At a global level, the Citigroup Board of Directors (“Citigroup Board”) plays a key role in the design and oversight of the Global Remuneration Policy through the Citigroup Personnel and Compensation Committee (“PCC”). All remuneration proposals are brought to the Citigroup Board for review and final approval.

In Singapore, the Country Senior Personnel Committee (“CSPC”) meets on a need-to basis to review and approve all human resource related policies, including CSL’s remuneration policy, based on guidelines provided by global and regional offices. CSPC is chaired by the Citi Country Officer, Mr Michael Zink and comprises of the Chief Financial Officer (“CFO”), Country Human Resources Officer (“CHRO”), Senior Country Operations Officer (“SCOO”) and the Heads of Business for Global Consumer Banking, International Personal Banking and Citi Private Bank. The remuneration packages of the Bank’s management are reviewed and approved by the CEO of CSL and Regional Consumer Head for South East Asia. Where the Bank’s management staff is from a control function (e.g. Finance, Risk Management, Compliance), the relevant Asia Pacific control function head will also review and approve the remuneration package.

1. The PCC will regularly review the design and structure of compensation programs relevant to all employees in the context of risk management.
2. In 2010, in response to FRB Guidance and European Union Capital Requirements Directive (CRD 3), a new global program, “Covered Employees” (“CEs”) was implemented. This program covers senior executives as well as employees who, either individually or as part of a group, have the ability to expose Citigroup’s various businesses to material amounts of risk. Citigroup’s definitions of CEs are:
Group 1: Employees who are Section 16 officers under the US Securities Exchange Act.
Group 2: Senior employees who can take, or influence the taking of material risk for the company or for a material business unit of the company.
The Bank adopted Citigroup’s definition to identify CEs. As of 31 December 2015, the Bank has identified 5 staff in CE Group 2. Senior executives are defined by Citigroup as Senior Managers (“SM”) which include the direct reports of the Chief Executive Officer of the Bank. As of 31 December 2015, there are 10 SMs.
3. Formal risk goals are part of the CE performance evaluation process, increasing the focus on risk, risk related performance and risk metrics. Management also established an independent review process

with inputs from Risk Management, Legal, Human Resource, Internal Audit and Compliance, using both qualitative and quantitative data. The compensation recommendations for CEs are presented to the PCC, prior to final approval of the recommendations.

4. The PCC reviews the compensation recommendations for CEs at several points through-out the year-end process, including preliminary reviews in mid-December, detailed reviews with responsible global business heads in early January and final reviews in mid-January at the full PCC and Citigroup Board meeting.
5. In addition, the CE process, including all recommendations and supporting material is audited by Internal Audit globally at the conclusion of the year-end cycle.
6. CE Group 1 and CE Group 2 compensation deferral structure:
 - a) A minimum deferral level (40%) and even split between deferred stock and deferred cash for those receiving incentive compensation of at least USD100,000; a 10% deferral as deferred cash for those with incentive compensation from USD50,000 to USD99,999.
 - b) Deferred cash is subject to a discretionary performance-based vesting (PBV) condition based on the occurrence of a material adverse outcome as well as a discretionary clawback provision.
 - c) Deferred stock will be subject to a formulaic PBV condition based on performance of the CE's "reference business".
 - d) PBV or Performance Based Vesting provision: The deferred cash component will have a discretionary PBV feature, which will potentially apply if it is determined by PCC that a material adverse outcome has occurred.
 - a) CEs who have significant responsibility for the event may have unvested awards reduced or cancelled.
 - b) All terms of the deferral program to be interpreted based on facts and circumstances, at the discretion of key Asia Senior Management (with input as appropriate from PCC).
 - e) All non-vested portions of deferred incentive compensation are subjected to forfeiture if the PCC determines that the CE:
 - a) received the award based on materially inaccurate publicly reported financial statements; or
 - b) knowingly engaged in providing materially inaccurate information relating to publicly reported financial statements; or
 - c) engaged in behavior constituting misconduct or exercised materially imprudent judgment that caused harm to the Company's business operations, or that resulted or could result in regulatory sanctions (whether or not formalized); or
 - d) failed to supervise or monitor individuals engaging in, or failed to escalate behavior constituting misconduct (whether or not gross misconduct) or who exercised materially imprudent judgment that caused harm to the Company's business operations; or
 - e) failed to supervise or monitor individuals engaging in, or failed to escalate behavior that resulted or could result in regulatory sanctions (whether or not formalized); or
 - f) materially violated any risk limits established or revised by senior management and/or risk management.

Review for Control Functions staff

1. The overall incentive pools for Control functions staff (including Risk Management and Compliance) are set at the global level, after taking into consideration a number of factors including, but not limited to Citigroup's financial performance, risk metrics, business strategy in terms of building/divesting certain businesses and/or growth/contraction in certain geographical regions, and positioning against the external markets.
2. For Control function staff, compensation is weighted in favor of fixed compensation relative to variable compensation.
3. The key performance standards for Control functions are set by the independent manager in the region and cascaded down to the country to be included in the Balanced Scorecard.
4. CSL's Head of the Risk Management has a direct reporting line to the CEO and a matrix reporting line to APAC Group Credit Director for Consumer Risk.

5.4 Effective Alignment of Compensation with Prudent Risk Taking

1. The determination and approval of bonus pools and the respective allocation to the regional products and functions are conducted at the global level. In addition to financial performance, the pool calculations are based on a business scorecard approach which takes account of risk with increasing degrees of sophistication. Bonus pool amounts are reviewed and approved internally by Citigroup's CEO and presented to the PCC for final approval.
2. For CSL, the business will submit a bonus pool request, together with a detailed analysis based on business performance and balanced scorecard approach. Financial numbers are confirmed independently by Financial Control. The bonus pool will then be reviewed at the regional level before being submitted to global for approval.
3. Employees who receive annual variable remuneration that equals or exceeds the local currency equivalent of USD100,000 will receive a greater percentage of their total annual compensation as variable remuneration and are subject to the Capital Accumulation Program rules. Currently, a percentage, ranging from 25% to 60%, will be awarded as deferred variable remuneration and (a) granted in the form of equity, (b) vests in four equal annual installments and (c) subject to claw-back provisions.
4. From 2010, all deferred stock awarded under the Capital Accumulation Program are subject to claw back. Non-vested amounts may be forfeited if the PCC determines that the staff:
 - a) Received the award based on materially inaccurate publicly reported financial statements; or
 - b) Knowingly engaged in providing materially inaccurate information relating to publicly reported financial statements; or
 - c) Materially violated any risk limits established or revised by senior management and/or risk management; or
 - d) Engage in gross misconduct.

5.5 Effective Supervisory Oversight and Engagement by Stakeholders

CSL is an indirect wholly owned subsidiary of Citigroup, Inc. As mentioned above, the remuneration policies/practices/structures adopted by CSL are guided and approved by Citigroup, Inc. The CSL Board reviews and concurs on the Global Remuneration Policy, including any changes to the structure and processes from previous year, annually.

In the interest of transparency to stakeholders such as its depositors, CSL has made disclosures (as it considers appropriate and aligned with the FSB Principles) of its remuneration practices and policies, bearing in the mind the sensitivity of such information from a competitive perspective.

5.6 Share Schemes

The Bank's employees are entitled to participate in various share schemes implemented by the parent company, Citigroup. Information on the share schemes is disclosed in Note 11 of the Bank's financial statements.

5.7 Quantitative Disclosures

Table 1: Guaranteed Bonuses, Sign-on Awards and Severance Payments

Category	SM	CE 2
Number of guaranteed bonuses	0	0
Number of sign-on awards	0	0
Number of severance payments	0	1
Total amounts of above payments made during the Financial Year (\$'000)	0	563

Table 2: Breakdown of Remuneration Awarded in Current Financial Year

Category		SM		CE 2	
		Unrestricted %	Deferred %	Unrestricted %	Deferred %
Fixed remuneration	Cash-based	75.76	0	41.83	0
	Shares and share-linked instruments	0.00	0	0.00	0
	Other forms of remuneration	2.86	0	2.75	0
Variable remuneration	Cash-based	19.74	0	33.92	10.75
	Shares and share-linked instruments	0	1.64	0	10.75
	Other forms of remuneration	0	0	0	0
	Total	100		100	

Explanation Notes

1. Except for the unionized staff, all other staff are not guaranteed bonuses. Any bonuses and/or incentives paid to the non-unionized staff will be considered as variable compensation. As of 31 December 2015, 2,062 of the Bank's employees received variable compensation. This included the 5 CE2 and 10 SM.
2. Under the FSB Principles for Sound Compensation Practices, the mix of cash, equity and other forms of compensation must be consistent with risk alignment. It is recommended that a substantial proportion, such as 40% to 60% of the variable compensation should be awarded in shares or share-linked instruments (or where appropriate, other non-cash instruments), as long as these instruments create incentives aligned with long-term value creation and the time horizons of risk. Awards in shares or share-linked instruments should be subject to an appropriate share retention policy, For the Bank, the percentage of compensation of the SM and CE that was variable and the forms in which this compensation was awarded was dependent on the amount of variable compensation that such employees received. SM and CE who received their annual variable compensation that equaled or exceeded USD100,000 (or local currency equivalent) would receive a greater percentage of their total annual compensation as variable remuneration and are subject to the Capital Accumulation Program ("CAP") rules. Currently, the percentage ranged from 25% to 60% awarded as deferred variable remuneration in equity, vested in four equal annual installments and subject to claw back provision.

Table 3: Breakdown of Long-term Remuneration Awards

Category	SM %	CE 2 %
Change in deferred remuneration awarded in current financial year	55	22
Change in amount of outstanding deferred remuneration from previous financial year	100	34
Outstanding deferred remuneration (breakdown):		
Cash	0	45
Shares & share-linked Instruments	100	55
Other forms of remuneration	0	0
Total	100	100
Outstanding deferred remuneration (performance adjustments):		
Of which exposed to ex-post adjustments	100	100
Reductions in current year due to ex-post adjustments (explicit ¹)	0	0
Reductions in current year due to ex-post adjustments (implicit ²)	0	0

Outstanding retained remuneration³ (performance adjustments):		
Of which exposed to ex-post adjustments	0	0
Reductions in current year due to ex-post adjustments (explicit)	0	0
Reductions in current year due to ex-post adjustments (implicit)	0	0

Notes:

¹ Examples of explicit ex-post adjustments include malus, clawbacks or similar reversals or downward revaluations of awards.

² Examples of implicit ex-post adjustments include fluctuations in the value of shares or performance units.

³ Retained remuneration refers to remuneration held back for a period and will be returned to staff after that period. An example is retention bonus.

The above table shows the changes in remuneration awards granted in 2014 and 2015. Due to staff movements, the composition of SM and CE 2 had changed and this is reflected in the above percentages.