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**RISK AND CAPITAL MANAGEMENT REPORT  
FOR 2017**

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## 1. Introduction

The Reserve Bank of Malawi published the Basel II Pillar 3 regulatory framework which aims at complementing the minimum capital requirements under Pillar 1 and the supervisory review process under Pillar 2. The Pillar 3 and Public disclosure is in line with section 96 of the Financial Services Act 2010 and in line with the directive on disclosure of information by banking institutions. The purpose of the framework is to encourage market discipline through a set of disclosure requirements which allows market participants to assess key pieces of information on the scope of application, capital risk exposures, risk assessment processes and hence capital adequacy of the bank. CDH Investment bank is regulated and supervised by the Reserve Bank of Malawi.

## 2. Corporate structure

CDH Investment Bank is a subsidiary of Continental Holdings Limited (the major shareholder) alongside Continental Capital Limited, Continental Asset Management Limited, Continental Asset Management Nominees Limited, Continental Commodities Limited and Continental Properties Limited. During the year, the operations of the subsidiary, CDH Forex Bureau ceased and the subsidiary became dormant from 28 June 2016.

CDHIB has the following shareholding structure: -

Name	2017	2016
	%	%
Continental Holdings Limited	74.45	74.45
Investments Alliance Limited	12.65	12.65
Kesaart Capital Limited	7.61	7.61
Unity Investments Limited	2.81	2.81
Savannah Investments Limited	<u>2.48</u>	<u>2.48</u>
	<u>100.00</u>	<u>100.00</u>

## 3 Capital management

The bank's capital management philosophy is aimed at maintaining an optimum level of capital and liquidity to enable it to pursue strategies that build long term shareholder value, whilst always meeting minimum regulatory capital and liquidity requirements. The risk appetite includes internal capital requirements which are the Bank's internal estimates of the capital required to cover all its material risks including those which are not captured under regulatory capital calculations.

### Regulatory capital

Reserve Bank of Malawi sets and monitors the capital requirements and requires the bank to maintain a minimum of 10 percent and 15 percent for core and total capital respectively. The Group's regulatory capital is analysed in two parts:-

- Tier I capital, which includes paid-up share capital, share premium, retained earnings, and other reserves less investment in subsidiaries
- Tier II capital, which includes investment revaluation reserve, property revaluation reserve, loan loss reserve and subordinated debt capital at 50% of the Tier I capital.



The capital adequacy position of CDHIB as at 31st December 2017, is as shown in the table below: -

	2017
Tier 1 capital	
Share capital	172,458
Share premium	746,744
Retained earnings	2,028,845
Less: Investments in unconsolidated banking and financial subsidiary companies	(15,0000)
Deferred Tax Asset	<u>(183,651)</u>
	<u><b>2,749,396</b></u>
Tier 2 capital	
Subordinated debt (50% of tier 1 capital)	639,680
Less: Investments in unconsolidated banking and financial subsidiary companies	(15,000)
Loan loss Reserve	430,345
	1,055,025
Total regulatory capital	<u><b>3,804,421</b></u>

Risk component	Approach to capital allocation	Risk weighted
Credit risk	Standardised	17,997,663
Market risk	Standardised	47,774
Operational risk	Basic indicator	5,551,127
Aggregated risk weighted assets		<u><b>23,596,564</b></u>

In its capital planning, the bank considers the impact of economic downturns/recession and the impact this would have on its capital and earnings. This is covered under the budgeting process where the statement of financial position and statement of profit or loss and other comprehensive income are projected in line with the bank's interest rate view.

In the event that actual performance is deviating from projected performance, the budget is revised to reflect the current economic situation and submitted to the board for approval with details of the measures to be taken and the revised targets.

The bank and its individually regulated operations have complied with all externally imposed capital requirements. The bank does not have any restrictions or impediments on transfer of funds or regulatory capital.



#### 4 Risk management framework

The board of directors of the bank has ultimate responsibility for the level of risk taken by the Bank and accordingly they have approved the overall business strategies and significant policies of the Bank, including those related to managing and taking risk. Senior management in the Bank is responsible for implementing strategies in a manner that limits risks associated with each strategy and that ensures compliance with applicable rules and regulation, both on a long term and day to day basis. The Bank has a risk management department, which is independent of those who accept risks. The Risk Management Department is tasked to:-

- identify current and emerging risks
- develop risk assessment and measurement systems
- establish policies, practices and other control mechanisms to manage risks
- develop risk tolerance limits for senior management and board approval
- monitor positions against approved risk tolerance limits
- report results of risk monitoring to senior management and the board.
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- To ensure that risk management is properly explained to and understood by all business lines, the board has established the following risk management policies:-
  - Credit Risk Management Policy
  - Liquidity Risk Management Policy
  - Operational Risk Management Policy
  - Capital Risk Management Policy
  - Market Risk Policy
  - Legal and compliance Risk policy
  - Reputational Risk policy
  - Stress Testing Framework

##### 4.1 Key risks

The Bank is exposed to the following financial risks from financial instruments:

- a) Credit risk;
- b) Liquidity risk
- c) Market risk
- d) Foreign exchange risk; and
- e) Operational risks
- f) Legal and compliance risks
- g) Reputational risks

##### 4.2 Risk Governance

CDHIB risk management approach is directed through compliance with legislation, policies and procedures and alignment with standards and best practices. It is the heads of departments that are leading in managing risk. Therefore everyone in the bank is responsible and accountable for risk management.

###### 4.2.1 Board of Directors (BOD)

The Board of directors retains the overall responsibility for strategic risk management of the bank. It is chiefly responsible for setting corporate strategy and reviewing management performance in implementing the bank's strategic plan.



The Board through its risk oversight role satisfy itself that the risk management processes designed and implemented by executives and Risk Manager is adapted to the board's corporate strategy and are functioning as directed, and that necessary steps are taken to foster a culture of risk-adjusted decision-making throughout the bank.

The board shall:

- a) manage the overall responsibility of risk management
- b) define clearly risk limits and approve those set by Senior Management
- c) review various policies of the Bank and make appropriate changes as and when deemed necessary.
- d) reevaluate these guidelines

The Bank has a unitary Board of Directors comprising a chairman, seven non-executive directors and one executive director. The Board has adopted without modification, the major principles of modern corporate governance as contained in the reports of Cadbury and King II, and the Basel Committee on Banking Supervision.

The Board meets four times a year. There are adequate and efficient communication and monitoring systems in place to ensure that the Directors receive all relevant, accurate information to guide them in making necessary strategic decisions, and providing effective leadership, control and strategic direction over the Bank's operations, and in ensuring that the Bank fully complies with relevant legal, ethical and regulatory requirements.

#### Board meetings - meeting attendance

Member		Date	Date	Date	Date
		23 March 2017	4 July 2017	3 October 2017	4 December 2017
Mr Franklin Kennedy	Chairman	✓	✓	✓	✓
Mr Robert Abbey	Director	✓	✓	✓	✓
Mr John McGrath	Director	✓	A	✓	✓
Mr Charles Asare	Director	✓	✓	✓	✓
Mr Kofi Sekyere	Director	✓	✓	✓	✓
Mr Ted Sauti-Phiri	Director	✓	✓	✓	✓
Mr Gibson Ngalamila	Director	✓	✓	✓	✓
Mr Kingsley Zulu	Director	✓	✓	✓	✓
Mr Misheck Esau	Managing Director				
Mr Dan Mwangwela	Company Secretary				

#### Key

✓ = Attendance

A = Apology

#### 4.2.2 Board Audit Committee (BAC)

The Committee comprise of three non-executive directors.

The committee assists the board in fulfilling its oversight responsibilities for the financial reporting process, the system of internal control and risk management, and the banks process for monitoring compliance with laws and regulations. The committee meets on a quarterly basis.



#### 4.2.3 Board Risk and Compliance Committee (BRCC)

The Committee comprise of three non-executive directors.

The committee is responsible for determining the bank risk appetite, tolerance limits for critical exposures, provide oversight of the ERM program to ensure that that the ERM process is used to develop and achieve strategic objectives of the bank. It provides audit and risk management advice to the Executive management.

#### 4.2.4 Chief Executive Officer/Managing Director (MD)

The Chief Executive Officer has the ultimate responsibility and accountability for establishing and maintaining suitable systems of internal control and risk management and manages the bank in a manner that is consistent with best practice in risk management.

#### 4.2.5 Operational Risk Committee (ORIC)

This is a management risk committee responsible to identify emerging enterprise risks, prioritize identified enterprise risks, direct and approve risk treatments, ensure that sufficient resources are allocated to implement treatment, monitor the results, review and update the risk register in preparation of the quarterly board report. The Committee meets on a monthly basis and on an adhoc basis.

#### 4.2.6 Asset and Liability Management Committee (ALCO)

The Committee is responsible for the structuring and management of the bank's book/balance sheet and investment policy.

Its objective is to maintain a balance between risk and return. It focuses on the management, identification and measurement of both the risks as related to interest rate risk and tenor mismatches, asset quality, capital planning, liquidity management and returns, as approved by the Board. The Committee meets fortnightly.

#### 4.2.7 Credit Risk Committee (CRECO)

The Committee oversees the credit and lending strategies and objectives of the bank including: overseeing the credit risk management, review Internal credit policies and establishing portfolio limits, review the quality and performance of the banks' credit portfolio and any matters as delegated by the board. The Committee meets on an adhoc basis with a minimum of one meeting per week.

#### 4.2.8 Risk Manager (RM)

The Risk Manager is responsible to manage the ERM program. This involves working with risk owners and executive management to analyze operational and enterprise risks, develop effective risk treatments, monitoring and ensuring that risks tolerance limits are maintained within the bank policy. He shall also coordinate risk management training and education, continuous improvement of ERM framework and associated policies and procedures.

#### 4.2.9 Legal and Compliance Officer (LCO)

The officer is tasked to understand and advocate the rules and regulations and effective management of and proactively work and advise the bank to manage legal and compliance risk in order to meet stakeholder expectations.



The Legal and Compliance Officer shall carry regular reviews and assessment of legal and compliance risks in the bank's activities including new products.

#### 4.2.10 Chief Internal Auditor (CIA)

The Chief Internal Auditor will provide independent and objective insight on the effectiveness of the bank consistent activities with regards to risk appetite and risk tolerance as defined by the board. Key roles include:

- Reviewing the management of key risks
- Evaluating the reporting of key risks
- Evaluating risk management process

#### 4.2.11 Chief Finance Officer (CFO)

The Chief Finance Officer plays broad strategic role in Enterprise wide risk management through involvement in financial reporting and performance management. The function is relied upon as the owner of business information, reporting and financial data and assist in decision support operations that enables effective and efficient operations of the bank.

### 5 Management of risks

CDHIB has risk governance structures which approves limits and thresholds consistent with the applicable regulatory requirements.

#### 5.1 Credit risk

Credit risk is the risk of financial loss to the Bank if a counter party to a financial instrument fails to meet their contractual obligations, and arises principally from the Bank's loans and advances to customers and other banks and its investment in securities. For risk management reporting purposes, the Bank considers and consolidates all elements of credit risk exposure (such as individual obligor default risk, country and sector risk).

##### Management of credit risk

The Boards of Directors of the Bank have delegated responsibility for the management of credit risk to their Credit Committees to which separate Credit departments report. The Credit Committees are responsible for oversight of credit risk, including:-

- Formulating credit policies, covering collateral requirements, credit assessment, risk grading and reporting, documentary and legal procedures, and compliance with regulatory and statutory requirements.
- Establishing the authorisation structure for the approval and renewal of credit facilities. All credit facilities are authorized by Head Office management. Larger facilities require approval by The Credit Committee or the Board of Directors as appropriate.
- Reviewing and assessing credit risk. The Credit Department assesses all credit exposures in excess of designated limits, prior to facilities being committed to customers by the branches concerned. Renewals and reviews of facilities are subject to the same review process.
- Limiting concentrations of exposure to counterparties, geographies and industries (for loans and advances), and by issuer, credit rating band, market liquidity and country (for investment securities).
- Reviewing compliance of business units with agreed exposure limits.



## 5.1 Credit risk (continued)

### Exposure to credit risk

The Bank's exposure to credit risk principally comprises loans and advances to customers analysed as follows:

#### Consolidated and Separate

	Loans and advances to customers			
	Investment securities		Loans and advances to customers	
	2017	2016	2017	2016
Standard (fully performing)	9,351,745	-	13,208,767	10,390,574
Past due but not impaired	-	-	83,332	6,584
Past due and impaired	—	—	<u>2,003,178</u>	<u>674,430</u>
Gross exposure to credit risk	-	-	15,295,277	11,071,588
Less: Allowance for impairment	-	-	(1,138,428)	(187,379)
Allowance for impairment	—	—	<u>(1,294,689)</u>	<u>(440,150)</u>
	<u>9,351,745</u>	—	<u>12,862,160</u>	<u>10,444,059</u>

Neither past due nor impaired assets comprise:

Current 1-30 days (Standard)	<u>9,351,745</u>	—	<u>13,208,767</u>	<u>10,444,917</u>
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Past due but not impaired loans and advances comprise:

	Consolidated and Separate	
	2017	2016
30-60 days	44,145	6,584
61-90 days	73,488	203,101
>90 days	<u>1,966,877</u>	<u>471,329</u>
	<u>2,086,510</u>	<u>681,014</u>

An estimate of the fair value of collateral held against loans and advances to customers is shown below:

Against past due but not impaired		
Property	231,400	12,240
Against neither past due nor impaired		
Property	413,102	985,679
Motor vehicles	800,460	287,146
Others	<u>8,160,157</u>	<u>8,958,251</u>
	<u>9,373,719</u>	<u>10,231,076</u>

The Group's policy is to pursue the timely realisation of the collateral in an orderly manner. The Group generally does not use the non-cash collateral for its own operations.

## 5.1 Credit risk (continued)

### Impaired loans and securities

Impaired loans and securities are loans and securities for which the Group determines that it is probable that it



will be unable to collect all principal and/or interest due according to the contractual terms of the loan / securities agreements.

#### Past due but not impaired loans

These are loans and securities where contractual interest or principal payments are past due but the Group believes that impairment is not appropriate on the basis of the level of security / collateral available and / or the stage of collection of amounts owed to the Group.

#### Allowances for impairment

The Group establishes an allowance for impairment losses that represents its estimate of incurred losses in its loan portfolio. The main components of this allowance are a specific loss component that relates to individually significant exposures.

#### Impairment policy

The Group writes off a loan / security balance (and any related allowances for impairment losses) when the Credit committee determines that the loans / securities are uncollectible. This determination is reached after considering information such as the occurrence of significant changes in the borrower / issuer's financial position such that the borrower / issuer can no longer pay the obligation, or that proceeds from collateral will not be sufficient to pay back the entire exposure.

The Bank monitors concentrations of credit risk by sector. An analysis of concentrations of credit risk at the reporting date is shown below:

Economic sector risk concentrations within the customer loan portfolio were as follows:

	Consolidated and Separate	
	2017	2016
Agriculture	718,245	936,342
Construction	464,475	23,586
Manufacturing	5,318,843	3,348,307
Wholesale and retail	4,439,272	2,819,903
Tourism and leisure	2,811	2,876
Transport	736,961	848,296
Others	<u>3,614,670</u>	<u>3,092,278</u>
	<u>15,295,277</u>	<u>11,071,588</u>

The risk that counterparties to trading instruments might default on their obligations is monitored on an on-going basis. In monitoring credit risk exposure, consideration is given to trading instruments with a positive fair value and the volatility of the fair value of trading instruments.

The credit quality of financial assets is managed by the Group. The table below shows the credit quality by class of financial asset for credit risk related items.

Consolidated and Separate	Note	Performing			Non - Performing			Total	Security against impaired loans	Net impairment				
		Standard	Special Mention	Sub-Standard	Doubtful	Loss								
<b>2017</b>														
<b>Credit quality</b>														
Financial assets at fair value through profit or loss		9,351,745	-	-	-	-	9,351,745	-	-	-				
Financial assets held to maturity		23,965,922	-	-	-	-	23,965,922	-	-	-				
Loans and advances to related party		2,437,836	-	-	-	-	2,437,836	-	-	-				
Loans and advances to other banks		7,008,894	-	-	-	-	7,008,894	-	-	-				
Loans and advances to customers		<u>13,208,761</u>	<u>-</u>	<u>99,547</u>	<u>429,055</u>	<u>1,557,908</u>	<u>15,295,277</u>	<u>3,177,081</u>	<u>1,294,689</u>					
Total recognised financial instruments		<u>55,973,164</u>	<u>-</u>	<u>99,547</u>	<u>429,055</u>	<u>1,557,908</u>	<u>58,059,674</u>	<u>3,177,081</u>	<u>1,294,689</u>					
<b>2016</b>														
<b>Credit quality</b>														
Financial assets at fair value through profit or loss		10,685,308	-	-	-	-	10,685,308	-	-	-				
Financial assets held to maturity		36,449,244	-	-	-	-	36,449,244	-	-	-				
Loans and advances to related party		2,880,898	-	-	-	-	2,880,898	-	-	-				
Loans and advances to customers		<u>10,390,574</u>	<u>-</u>	<u>170,295</u>	<u>177,434</u>	<u>333,285</u>	<u>11,071,588</u>	<u>1,279,312</u>	<u>440,150</u>					
Total recognised financial instruments		<u>60,406,024</u>	<u>-</u>	<u>170,295</u>	<u>177,434</u>	<u>333,285</u>	<u>61,087,038</u>	<u>1,279,312</u>	<u>440,150</u>					

## 5.1 Credit risk (continued)

Maximum exposure to credit risk without taking into account any collateral

The table below shows the maximum exposure to credit risk by class of financial instrument. Financial instruments include financial instruments defined and recognised under IAS 39 Financial Instruments: Recognition and measurement as well as other financial instruments not recognised. The maximum exposure is presented gross, before the effect of mitigation through the use of master netting and collateral agreements.

	Consolidated		Separate	
Gross maximum exposure	2017	2016	2017	2016
Cash held with the Reserve Bank of Malawi	2,238,054	1,611,267	2,238,054	1,611,267
Cash held with local banks	5,843	866	5,843	866
Cash held with foreign banks	1,391,842	1,859,924	1,391,842	1,859,924
Clearing balances	(1,000)	(940,002)	(1,000)	(940,002)
Cash balances	315,076	496,799	315,076	496,799
Financial assets at fair value through profit or loss	9,351,745	10,685,308	9,351,745	10,685,308
Financial assets held to maturity	23,965,922	36,449,244	23,965,922	36,449,244
Loans and advances to related parties	2,437,836	2,880,898	2,437,836	2,880,898
Loans and advances to other banks	7,008,894	-	7,008,894	-
Personal and Business Banking				
- Other loans and advances	1,247,620	1,268,888	1,247,620	1,268,888
Corporate and Investment Banking:				
- Corporate lending	<u>12,546,702</u>	<u>9,080,056</u>	<u>12,546,702</u>	<u>9,080,056</u>
Total recognised financial instruments	60,508,534	63,393,248	60,508,534	63,393,248
Financial guarantees	723,738	160,613	723,738	160,613
Total unrecognised financial instruments	<u>723,738</u>	<u>160,613</u>	<u>723,738</u>	<u>160,613</u>
Total credit risk exposure	<u>61,232,272</u>	<u>63,553,861</u>	<u>61,232,272</u>	<u>63,553,861</u>

Net exposure to credit risk without taking into account any collateral or other credit enhancements



In respect of certain financial assets, the Group has legally enforceable rights to offset them with financial liabilities. However, in normal circumstances, there would be no intention of settling net, or of realising the financial assets and settling the financial liabilities simultaneously. Consequently, the financial assets are not offset against the respective financial liabilities for financial reporting purposes. However, the exposure to credit risk relating to the respective financial assets is mitigated as follows:

	At 31 December 2017	
Consolidated	Carrying amount	Net exposure to credit risk
Cash and balances with banks	3,949,815	3,949,815
Loans and advances to related party	2,437,836	2,437,836
Loans and advances to other banks	7,008,894	7,008,894
Loans and advances to customers	12,862,160	12,862,160
	<u>33,317,667</u>	<u>33,317,667</u>
Financial assets	<u>59,576,372</u>	<u>59,576,372</u>

  

	At 31 December 2016	
Consolidated	Carrying amount	Net exposure to credit risk
Cash and balances with banks	3,028,854	3,028,854
Loans and advances to related party	2,880,898	2,880,898
Loans and advances to customers	10,444,059	10,444,059
	<u>47,134,552</u>	<u>47,134,552</u>
Financial assets	<u>63,488,363</u>	<u>63,488,363</u>

  

	At 31 December 2017	
Separate	Carrying amount	Net exposure to credit risk
Cash and balances with banks	3,949,815	3,949,815
Loans and advances to other banks	2,437,836	2,437,836
Loans and advances to other banks	7,008,894	7,008,894
Loans and advances to customers	12,862,160	12,862,160
	<u>33,317,667</u>	<u>33,317,667</u>
Financial assets	<u>59,576,372</u>	<u>59,576,372</u>

  

	At 31 December 2016	
Separate	Carrying amount	Net exposure to credit risk
Cash and balances with banks	3,028,854	3,028,854
Loans and advances to other banks	2,880,898	2,880,898
Loans and advances to customers	10,444,059	10,444,059
	<u>47,134,552</u>	<u>47,134,552</u>
Financial assets	<u>63,488,363</u>	<u>63,488,363</u>



## Collateral held and other credit enhancements and their financial effect

The Group hold collateral and other credit enhancements against certain of its credit exposures. The table below sets out the principle types of collateral held against different types of financial assets.

### Type of credit exposure

	<u>2017</u> %	<u>2016</u> %	Principle type of collateral held
Loans and advances to banks			
- Inter-bank placement	100	100	Marketable securities
Loans and advances to retail customers			
- Personal loans	92	95	Cash and property
Loan advances to corporate customers			
- Asset Finance	100	100	Property and equipment
- Other	90	90	Commercial property floating charges over corporate assets
Loan and advances to corporate customers			

### Loan and advances to corporate customers

The general credit worthiness of a corporate customer tends to be the most relevant indicator of credit quality of a loan extended to it. However, collateral provides additional security and the Group generally requests that corporate borrowers provide it. The Group may take collateral in the form of a first charge over real estate, floating charges over all corporate assets and other liens and guarantees.

Because the Group's focus on corporate customers' creditworthiness, the Group does not routinely update the valuation of collateral held against all loans to corporate customers. Valuation of collateral is updated when the credit risk of a loan significantly deteriorates significantly and the loan is monitored more closely for impaired loans, the group obtains appraisals of collateral measurement.

### Other types of collateral and credit enhancements

In addition to the collateral included in the table above, the Group also holds other types of collateral and credit enhancements such as second charges for which specific values are not generally available. Assets obtained by taking possession of collateral.

Details of financial and non-financial assets obtained by the Group during the year by taking possession of collateral held as security against loans and advances as well as calls made on credit enhancements and held at the year-end are shown below:

Consolidated and Separate	2017	2016
Property	413,102	985,679
Motor Vehicles	800,460	287,146
Stocks	433,750	2,172,620
Guarantees	607,275	654,637
Cash	2,709,132	2,333,107
Debentures	506,250	361,387
Others	<u>3,903,750</u>	<u>3,436,500</u>
	<u>9,373,719</u>	<u>10,231,076</u>

The Group policy is to pursue timely realisation of the collateral in an orderly manner. The Group generally does not use the non-cash collateral for its own operations but will be actively marketed to be sold.

Liquidity risk is the risk that the Group will encounter difficulty in meeting obligations arising from its financial liabilities.



#### Management of liquidity risk

The Group's approach to managing liquidity is to ensure as far as possible that it will always have sufficient liquidity to meet its liabilities when due, both under stressed and normal conditions, without causing damage to the Group's reputation.

The daily liquidity position is monitored. It is assumed that under normal circumstances customer demand deposits will remain stable or increase in value and unrecognised loan/ overdraft commitments are not expected to be immediately drawn down in their entirety. Regular stress testing is done under normal and severe, market conditions and the results are discussed with the Asset and Liability Committee (ALCO) and the Board Risk and Compliance Committee (BRC).

All liquidity policies and procedures are subject to review and approval by ALCO. These are management committees which meet once a month or more often if necessary. The daily monitoring of liquidity is the responsibility of an integrated treasury department which monitors the level of mismatches in the maturity positions of assets and liabilities.

#### Asset and Liability Management Committee (ALCO)

The primary objective of ALCO is to ensure a proper balance in terms of maturity profile, cost and yield, risk exposure etc. between funds mobilized and funds deployed. ALCO seeks to manage risks in order to minimize the volatility of net interest income and protect the long term economic value of the Bank. The committee also monitors the capital adequacy of the Bank.

Key functions of ALCO include setting pricing guidelines for assets and liabilities, setting limits and managing liquidity risk and interest rate risk and ensuring that contingency funding plans are in place to avert funding crises.

The table below analyses financial assets and financial liabilities into relevant maturity rankings based on the remaining contractual maturities:



Consolidated	Carrying amount	Cash inflow/ (outflow)	Up to 1 month	1-3 months	3-6 months	6-12 months	1-3 years
2017							
<b>ASSETS</b>							
Cash and cash equivalents	3,949,815	3,949,815	3,949,815				
Loans and advances to customers	12,862,160	14,616,073	3,029,307	2,251,605	983,369	5,584,264	2,767,528
Loans and advances to related party	2,437,836	2,478,669	1,591,312	364,029	-	523,328	-
Loans and advances to other banks	7,008,894	7,011,491	7,011,491	-	-	-	-
Financial assets at fair value through profit or loss	9,351,745	12,394,826	1,562,137	-	1,407,179	7,422,080	2,003,430
Financial assets held to maturity	23,965,922	32,549,799	66,333	6,225,764	757,710	10,160,401	15,339,591
Amounts due from related parties	<u>127,747</u>	<u>127,747</u>	<u>127,747</u>	-	-	-	-
<b>Total assets</b>	<b>59,704,119</b>	<b>73,128,420</b>	<b>17,338,142</b>	<b>8,841,398</b>	<b>3,148,258</b>	<b>23,690,073</b>	<b>20,110,549</b>
<b>LIABILITIES</b>							
Current and savings account	7,340,872	7,339,180	7,339,180	-	-	-	-
Foreign currency accounts	3,115,063	3,108,366	3,108,366	-	-	-	-
Term deposit accounts	15,740,544	15,973,804	8,554,073	3,770,855	2,282,228	1,366,648	-
Investment funds	30,489,716	31,760,934	11,342,956	7,802,048	6,414,648	6,201,282	-
Subordinated debt	1,000,000	1,000,000	-	-	-	-	1,000,000
Balances due to other banks	<u>135,000</u>	<u>135,000</u>	<u>135,000</u>	-	-	-	-
<b>Total liabilities</b>	<b><u>57,821,195</u></b>	<b><u>59,317,284</u></b>	<b><u>30,479,575</u></b>	<b><u>11,572,903</u></b>	<b><u>8,696,876</u></b>	<b><u>7,567,930</u></b>	<b><u>1,000,000</u></b>
<b>Net liquidity gap</b>	<b><u>1,882,924</u></b>	<b><u>13,811,136</u></b>	<b><u>(13,141,433)</u></b>	<b><u>(2,731,505)</u></b>	<b><u>(5,548,618)</u></b>	<b><u>16,122,143</u></b>	<b><u>19,110,549</u></b>
<b>Cumulative liquidity gap</b>	<b><u>-</u></b>	<b><u>-</u></b>	<b><u>(13,141,433)</u></b>	<b><u>(15,872,938)</u></b>	<b><u>(21,421,556)</u></b>	<b><u>(5,299,413)</u></b>	<b><u>13,811,136</u></b>

Consolidated	Carrying amount	Cash inflow/ (outflow)	Up to 1 month	1-3 months	3-6 months	6-12 months	1-3 years
2016							
<b>ASSETS</b>							
Cash and cash equivalents	3,028,854	3,028,854	3,028,854	-	-	-	-
Loans and advances to customers	10,444,059	12,813,273	2,637,719	114,664	1,609,874	2,804,479	5,646,519
Financial assets	47,134,552	45,802,534	1,028,261	4,072,314	20,773,322	14,567,124	5,361,513
Amounts due from related parties	148,820	148,820	148,820	-	-	-	-
Balances due from other banks	<u>2,880,898</u>	<u>3,214,622</u>	<u>-</u>	<u>617,411</u>	<u>-</u>	<u>2,597,211</u>	<u>-</u>
<b>Total assets</b>	<b>63,637,183</b>	<b>65,008,103</b>	<b>6,843,654</b>	<b>4,804,389</b>	<b>22,383,196</b>	<b>19,968,814</b>	<b>11,008,032</b>
<b>LIABILITIES</b>							
Current and savings account	5,256,053	5,249,602	5,249,602	-	-	-	-
Foreign currency accounts	3,673,371	3,666,623	3,666,623	-	-	-	-
Term deposit accounts	11,433,267	11,264,190	28,808	8,601,055	2,634,327	-	-
Investment funds	33,769,619	31,125,529	11,264,420	12,340,431	4,420,678	3,100,000	-
Subordinated debt	1,000,000	1,000,000	-	-	-	-	1,000,000
Balances due to other banks	5,950,000	5,950,000	5,950,000	-	-	-	-
<b>Total liabilities</b>	<b><u>61,082,310</u></b>	<b><u>58,255,944</u></b>	<b><u>26,159,453</u></b>	<b><u>20,941,486</u></b>	<b><u>7,055,005</u></b>	<b><u>3,100,000</u></b>	<b><u>1,000,000</u></b>
<b>Net liquidity gap</b>	<b><u>2,554,873</u></b>	<b><u>6,752,159</u></b>	<b><u>(19,315,799)</u></b>	<b><u>(16,137,097)</u></b>	<b><u>15,328,191</u></b>	<b><u>16,868,814</u></b>	<b><u>10,008,032</u></b>
<b>Cumulative liquidity gap</b>	<b><u>-</u></b>	<b><u>-</u></b>	<b><u>(19,315,799)</u></b>	<b><u>(35,452,896)</u></b>	<b><u>(20,124,705)</u></b>	<b><u>(3,255,891)</u></b>	<b><u>6,752,141</u></b>

Separate	Carrying amount	Cash inflow/ (outflow)	Up to 1 month	1-3 months	3-6 months	6-12 months	1-3 years
2017							
<b>ASSETS</b>							
Cash and cash equivalents	3,949,815	3,949,815	3,949,815	-	-	-	-
Loans and advances to customers	12,862,160	14,616,073	3,029,307	2,251,605	983,369	5,584,264	2,767,507
Loans and advances to related party	2,437,836	2,478,669	1,591,312	364,029	-	523,328	-
Loans and advances to other banks	7,008,894	7,011,491	7,011,491	-	-	-	-
Financial assets at fair value through profit or loss	9,351,745	12,394,826	1,562,137	-	1,407,179	7,422,080	2,003,430
Financial assets held to maturity	23,965,922	32,549,799	66,333	6,225,764	757,710	10,160,401	15,339,591
Amounts due from related parties	<u>127,747</u>	<u>127,747</u>	<u>127,747</u>	-	-	-	-
<b>Total assets</b>	<b>59,704,119</b>	<b>73,128,420</b>	<b>17,338,142</b>	<b>8,841,398</b>	<b>3,148,258</b>	<b>23,690,073</b>	<b>20,110,528</b>
<b>LIABILITIES</b>							
Current and savings account	7,340,872	7,339,180	7,339,180	-	-	-	-
Foreign currency accounts	3,115,063	3,108,366	3,108,366	-	-	-	-
Term deposit accounts	15,740,544	15,973,804	8,554,073	3,770,855	2,282,228	1,366,648	-
Investment funds	30,489,716	31,760,934	11,342,956	7,802,048	6,414,648	6,201,282	-
Subordinated liability	1,000,000	1,000,000	-	-	-	-	1,000,000
Balances due to other banks	<u>135,000</u>	<u>135,000</u>	<u>135,000</u>	-	-	-	-
<b>Total liabilities</b>	<b><u>57,821,195</u></b>	<b><u>59,317,284</u></b>	<b><u>30,479,575</u></b>	<b><u>11,572,903</u></b>	<b><u>8,696,876</u></b>	<b><u>7,567,930</u></b>	<b><u>1,000,000</u></b>
<b>Net liquidity gap</b>	<b>1,882,924</b>	<b>13,811,136</b>	<b>(13,141,433)</b>	<b>(2,731,505)</b>	<b>(5,548,618)</b>	<b>16,122,143</b>	<b>19,110,528</b>
<b>Cumulative liquidity gap</b>	<b>-</b>	<b>-</b>	<b>(13,141,433)</b>	<b>(15,872,938)</b>	<b>(21,421,556)</b>	<b>(5,299,413)</b>	<b>13,811,115</b>

Separate	Carrying amount	Cash inflow/ (outflow)	Up to 1 month	1-3 months	3-6 months	6-12 months	1-3 years
2016							
<b>ASSETS</b>							
Cash and cash equivalents	3,028,854	3,028,854	3,028,854	-	-	-	-
Loans and advances to customers	10,444,059	12,813,273	2,637,719	114,664	1,609,874	2,804,479	5,646,519
Financial assets	47,134,552	45,802,534	1,028,261	4,072,314	20,773,322	14,567,124	5,361,513
Amounts due from related parties	148,820	148,820	148,820	-	-	-	-
Balances due from other banks	<u>2,880,898</u>	<u>3,214,622</u>	<u>—</u>	<u>617,411</u>	<u>—</u>	<u>2,597,211</u>	<u>—</u>
<b>Total assets</b>	<b>63,637,183</b>	<b>65,008,103</b>	<b>6,843,654</b>	<b>4,804,389</b>	<b>22,383,196</b>	<b>19,968,814</b>	<b>11,008,032</b>
<b>LIABILITIES</b>							
Current and savings account	5,256,053	5,249,602	5,249,602	-	-	-	-
Foreign currency accounts	3,673,371	3,666,623	3,666,623	-	-	-	-
Term deposit accounts	11,433,267	11,264,190	28,808	8,601,055	2,634,327	-	-
Investment funds	33,769,619	31,125,529	11,264,420	12,340,431	4,420,678	3,100,000	-
Subordinated liabilities	1,000,000	1,000,000	-	-	-	-	1,000,000
Balances due to other banks	<u>5,950,000</u>	<u>5,950,000</u>	<u>5,950,000</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>—</u>
<b>Total liabilities</b>	<b>61,082,310</b>	<b>58,255,944</b>	<b>26,159,453</b>	<b>20,941,486</b>	<b>7,055,005</b>	<b>3,100,000</b>	<b>1,000,000</b>
<b>Net liquidity gap</b>	<b>2,554,873</b>	<b>6,752,159</b>	<b>(19,315,799)</b>	<b>(16,137,097)</b>	<b>15,328,191</b>	<b>16,868,814</b>	<b>10,008,032</b>
<b>Cumulative liquidity gap</b>	<b>—</b>	<b>—</b>	<b>(19,315,799)</b>	<b>(35,452,896)</b>	<b>(20,124,705)</b>	<b>(3,255,891)</b>	<b>6,752,141</b>

## 5.2 Liquidity risk

The previous table shows the undiscounted cash flows on the Group's financial assets and liabilities on the basis of their expected maturities as opposed to their earliest possible contractual maturity. Out of these, 20% are demand deposits and overdrafts, and are classified in the up to one month category with the balance in the 1-3 years category as the Group's expected cash flows on these instruments varies significantly from their contractual maturity profile.

The Reserve Bank of Malawi has issued the following guidelines on the management of liquidity:

- Liquidity Ratio 1: Net liquidity (total liquid assets less suspense accounts in foreign currency) divided by total deposits must be at least 30 percent.
- Liquidity Ratio 2: Net liquidity (total liquid assets less suspense account in foreign currency and cheques in the course of collection) divided by total deposits must be at least 20 percent.

Liquidity Ratios 1 and 2 were as specified below:

### Consolidated and Separate

	2017	2016
Liquidity Ratio I	53.69 %	68.06%
Liquidity Ratio II	53.69 %	68.06%

## 5.3 Market risk

### Market risk management policy

Market risk is the risk that changes in market prices, such as interest rates and foreign exchange rates will affect the Group income or the value of its holding of financial instruments. The objective of the Group's market risk management policy is to manage and control market risk exposures within acceptable parameters while optimizing the return on risk.

### 5.3.1 Foreign exchange risk

Foreign exchange rate risk is the potential impact of adverse currency rates movements on earnings and economic value. It arises from change in value of local currency against foreign currencies.

Foreign currency transactions and positions are monitored by senior management and ALCO.

### 5.3.1 Foreign exchange risk (continued)

The responsibilities of the Integrated Treasury Department include monitoring of foreign exchange risk. This involves the risks of the Group incurring financial loss on settlement of foreign exchange positions taken in both the trading and banking books. The foreign exchange positions arise from the following activities:-

- Trading in foreign currencies through spot, forward and option transactions as a market maker or position taker, including the unhedged position arising from customer driven foreign exchange transactions.
- Holding foreign currency position in the bank books (e.g. in the form of loans, deposits, cross border investments, etc).

The treasury department is responsible for:-

- Setting the foreign exchange risk management strategy and tolerance levels.
- Ensuring that effective risk management systems and internal controls are in place.
- Monitoring significant foreign exchange exposure.
- Ensuring that foreign exchange operations are supported by adequate management information systems which complement the risk management strategy
- Reviewing the policies, procedures and currency limits regularly in line with changes in the economic environment.

The ALCO regularly monitors the controls put in place by the treasury department, which are approved and reviewed by the board from time to time.

#### 5.3.2 Interest rate risk

Interest rate risk is the exposure of Group's financial condition to adverse movements in interest rates. It basically arises from timing differences in the maturity of re-pricing of the Group's assets and liabilities. Changes in interest rates can have adverse effects on the Group's earnings and its economic value. ALCO monitors interest rate risk in the Group.

Stress testing on the three elements of market risk is done by an independent risk function. The results are discussed with ALCO and the Risk Committee and appropriate risk mitigation measures and contingency plans are implemented. Below is a summary of the Group's interest rate gap position:



Variable rate instruments expose the Group to cash flow interest rate risk whereas fixed rate instruments expose the Group to fair value interest rate risk.

Consolidated	Fixed Rate Instruments							Total carrying amount
	Zero rate	Floating rate	0-3 months	3-6 months	6-9 months	9-12 months	Over 12 months	
2017								
Cash and cash equivalents	3,949,815	-	-	-	-	-	-	3,949,815
Loans and advances to customers	-	12,862,160	-	-	-	-	-	12,862,160
Loans and advances to related party	-	2,437,836	-	-	-	-	-	2,437,836
Loans and advances to other banks	-	7,008,894	-	-	-	-	-	7,008,894
Financial assets at fair value through profit or loss	-	-	1,562,137	1,407,179	6,382,429	-	-	9,351,745
Financial assets held to maturity	—	—	6,020,102	633,156	—	8,345,365	8,967,299	23,965,922
Total assets	3,949,815	22,308,890	7,582,239	2,040,335	6,382,429	8,345,365	8,967,299	50,576,372
Deposits from banks	-	-	135,000	-	-	-	-	135,000
Current and savings accounts	-	-	7,340,872	-	-	-	-	7,340,872
Foreign currency accounts	-	-	3,115,063	-	-	-	-	3,115,063
Term deposit accounts	-	-	12,000,667	1,373,851	2,366,026	-	-	15,740,544
Investment funds	-	-	19,116,577	5,823,933	5,549,206	-	-	30,489,716
Subordinated liabilities	—	—	—	—	—	—	1,000,000	1,000,000
Total liabilities	—	—	41,708,178	7,197,784	7,915,232	—	1,000,000	57,821,195
Interest gap	3,949,815	22,308,890	(34,125,939)	(5,157,449)	(1,532,805)	8,345,365	7,967,299	1,755,177
Impact on post tax profit or equity of an increase in the interest rate 5%	-	780,811	(1,194,408)	(180,511)	(53,648)	292,088	278,855	61,431
Impact on post tax profit or equity of a decrease in the interest rate 5%	-	(780,811)	1,194,408	180,511	53,648	(292,088)	(278,855)	(61,431)

Variable rate instruments expose the Group to interest rate risk whereas fixed rate instruments expose the Group to fair value interest rate risk. The sensitivity impact is calculated at 70% of 5% of the interest rate gap. The 70% is applied to take into account tax effects.

Consolidated

Fixed Rate Instruments



2016	Zero rate	Floating rate	0-3 months	3-6 months	6-9 months	9-12 months	Over 12 months	Total carrying amount
Cash and cash equivalents	3,028,854	-	-	-	-	-	-	3,028,854
Loans and advances to customers	-	10,444,059	-	-	-	-	-	10,444,059
Loans and advances to related party	-	2,880,898	-	-	-	-	-	2,880,898
Financial assets	<u>-</u>	<u>-</u>	<u>6,432,594</u>	<u>20,773,322</u>	<u>1,500,000</u>	<u>13,067,123</u>	<u>5,361,513</u>	<u>47,134,552</u>
<b>Total assets</b>	<b>3,028,854</b>	<b>13,324,957</b>	<b>6,432,594</b>	<b>20,773,322</b>	<b>1,500,000</b>	<b>13,067,123</b>	<b>5,361,513</b>	<b>63,488,363</b>
Deposits from banks	-	-	5,950,000	-	-	-	-	5,950,000
Current and savings accounts	-	-	5,256,053	-	-	-	-	5,256,053
Foreign currency accounts	-	-	3,673,371	-	-	-	-	3,673,371
Term deposit accounts	-	-	8,798,940	2,634,327	-	-	-	11,433,267
Investment funds	-	-	13,908,510	16,761,109	1,500,000	1,600,000	-	33,769,619
Subordinated liabilities	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>1,000,000</u>	<u>1,000,000</u>
<b>Total liabilities</b>	<b><u>-</u></b>	<b><u>-</u></b>	<b><u>37,586,874</u></b>	<b><u>19,395,436</u></b>	<b><u>1,500,000</u></b>	<b><u>1,600,000</u></b>	<b><u>1,000,000</u></b>	<b><u>61,082,310</u></b>
<b>Interest gap</b>	<b>3,028,854</b>	<b>13,324,957</b>	<b>(31,154,280)</b>	<b>1,377,886</b>	<b>-</b>	<b>11,467,123</b>	<b>4,361,513</b>	<b>2,406,053</b>
Impact on post tax profit or equity of an increase in the interest rate 5%	-	466,373	(1,090,400)	48,226	-	401,349	152,653	84,212
Impact on post tax profit or equity of a decrease in the interest rate 5%	-	(466,373)	1,090,400	(48,226)	-	(401,349)	(152,653)	(84,212)

Variable rate instruments expose the Group to interest rate risk whereas fixed rate instruments expose the Group to fair value interest rate risk. The sensitivity impact is calculated at 70% of 5% of the interest rate gap. The 70% is applied to take into account tax effects.



Separate	2017	Fixed Rate Instruments							Total carrying amount
		Zero rate	Floating rate	0-3 months	3-6 months	6-9 months	9-12 months	Over 12 months	
Cash and cash equivalents	3,949,815		-	-	-	-	-	-	3,949,815
Loans and advances to customers	-	12,862,160		-	-	-	-	-	12,862,160
Loans and advances to related party	-	2,437,836		-	-	-	-	-	2,437,836
Loans and advances to other banks	-	7,008,894		-	-	-	-	-	7,008,894
Financial assets at fair value through profit or loss	-	-	1,562,137	1,407,179	6,382,429		-	-	9,351,745
Financial assets held to maturity	-	-	<u>6,020,102</u>	<u>633,156</u>		<u>8,345,365</u>	<u>8,967,299</u>	<u>23,965,922</u>	
Total assets	<u>3,949,815</u>	<u>22,308,890</u>	<u>7,582,239</u>	<u>2,040,335</u>	<u>6,382,429</u>	<u>8,345,365</u>	<u>8,967,299</u>	<u>59,576,372</u>	
Deposits from banks	-	-	135,000		-	-	-	-	135,000
Current and savings accounts	-	-	7,340,872		-	-	-	-	7,340,872
Foreign currency accounts	-	-	3,115,063		-	-	-	-	3,115,063
Term deposit accounts	-	-	12,000,667	1,373,851	2,366,026		-	-	15,740,544
Investment funds	-	-	19,116,577	5,823,933	5,549,206		-	-	30,489,716
Subordinated liabilities	-	-	-	-	-	-	-	1,000,000	1,000,000
Total liabilities	-	-	<u>41,708,178</u>	<u>7,197,784</u>	<u>7,915,232</u>		<u>1,000,000</u>	<u>57,821,195</u>	
Interest gap	<u>3,949,815</u>	<u>22,308,890</u>	<u>(34 125 939)</u>	<u>(5,157,449)</u>	<u>(1,532,805)</u>	<u>8,345,365</u>	<u>7,967,299</u>	<u>1,755,177</u>	
Impact on post tax profit or equity of an increase in the interest rate 5%	-	780,811	(1,194,408)	(180,511)	(53,648)	292,088	278,855	61,431	
Impact on post tax profit or equity of a decrease in the interest rate 5%	-	(780,811)	1,194,408	180,511	53,648	(292,088)	(278,855)	(61,431)	



Separate	Fixed rate instruments							Total carrying amount
	Zero rate	Floating rate	0-3 months	3-6 months	6-9 months	9-12 months	Over 12 months	
2016								
Cash and cash equivalents	3,028,854	-	-	-	-	-	-	3,028,854
Loans and advances to customers	-	10,444,059	-	-	-	-	-	10,444,059
Loans and advances to related party	-	2,880,898	-	-	-	-	-	2,880,898
Financial asset investments	-	-	6,432,594	20,773,322	1,500,000	13,067,123	5,361,513	47,134,552
<b>Total assets</b>	<b>3,028,854</b>	<b>13,324,957</b>	<b>6,432,594</b>	<b>20,773,322</b>	<b>1,500,000</b>	<b>13,067,123</b>	<b>5,361,513</b>	<b>63,488,363</b>
Deposits from banks	-	-	5,950,000	-	-	-	-	5,950,000
Current and savings accounts	-	-	5,256,053	-	-	-	-	5,256,053
Foreign currency accounts	-	-	3,673,371	-	-	-	-	3,673,371
Term deposit accounts	-	-	8,798,940	2,634,327	-	-	-	11,433,267
Investment funds	-	-	13,908,510	16,761,109	1,500,000	1,600,000	-	33,769,619
Subordinated debt	-	-	-	-	-	-	1,000,000	1,000,000
<b>Total liabilities</b>	<b>-</b>	<b>-</b>	<b>37,586,874</b>	<b>19,395,436</b>	<b>1,500,000</b>	<b>1,600,000</b>	<b>1,000,000</b>	<b>61,082,310</b>
Interest gap	3,028,854	13,324,957	(31,154,280)	1,377,886	-	11,467,123	4,361,513	2,406,053
Impact on post tax profit or equity of increase of interest rate	-	466,373	(1,090,400)	48,226	-	401,349	152,653	84,212
5%	-	(466,373)	1,090,400	(48,226)	-	(401,349)	(152,653)	(84,212)

#### Effective interest rates of financial assets and liabilities

The effective interest rates for the principal financial assets and liabilities at 30 June 2015 were in the following ranges:-

	Consolidated and Separate	
	2017	2016
	%	%
<b>Assets:</b>		
Government securities	19-39	13-32
Deposits with banking institutions	14-26	24-29
Loans and advances to customers (base rate)	26	35.00
<b>Liabilities:</b>		
Customer deposits	6-13	14-29

#### 5.4 Operational risks

Operational risk is the risk of direct or indirect loss arising from a wide variety of causes associated with the Group's processes, personnel, technology and infrastructure and from external factors other than credit, liquidity, interest rate and market risks such as those arising from legal and regulatory requirements and the requirement to observe generally accepted standards of corporate behaviour. Operational risks arise from all of the Group's operations.

The objective of the Group is to manage operational risks so as to balance the avoidance of financial losses and damages to the bank's reputation with overall cost effectiveness and to avoid control procedures that restrict initiative and creativity.

The primary responsibility for the development and implementation of controls to address operational risk is assigned by the Risk committee of the board to senior management within all operating units. The responsibility is supported by the development of overall standards in the Group for the management of operational risks in the following areas:-

- requirements for appropriate segregation of duties, including the independent authorisation of transactions.
- requirements for the reconciliation and monitoring of transactions
- compliance with regulatory and other legal requirements
- documentation of controls and procedures.
- requirements for the yearly assessment of operational risks faced, and the adequacy of controls and procedures to address the risks identified
- requirements for the reporting of operational losses and proposed remedial action.
- development of contingency plans
- training and professional development
- ethical and business standards
- risk mitigation, including insurance where it is cost effective
- implementation of anonymous hotline for reporting fraud and other inappropriate conduct as per fraud risk policy

Compliance with Group standards is supported by a programme of yearly reviews undertaken by the Group Internal Audit. The results of Internal Audit reviews are discussed with the management of the business unit to which they relate, with summaries submitted to the Board Audit, Risk and Compliance Committee.

Risk management function also assesses operational risks and discusses the results with senior management and the risk committee.

#### 5.5 Legal and Compliance risk

The office of Compliance Officer is an independent risk management unit, which also has unrestricted access to the managing director and the chairman of Board, Risk and Compliance Committee. The Group is subject to



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extensive supervisory and regulatory regimes, and the executive management remains responsible for overseeing the management of the bank's compliance risk.

Money laundering controls are managed within the compliance function. The Group has adopted anti-money laundering policies including Know-Your-Customer policies and procedures and adheres to the country's anti-money laundering legislation and Reserve Bank of Malawi regulations.

The management of compliance risk has become a distinct discipline within the Group's overall risk management framework. Ultimate responsibility for this risk lies with the Board of Directors. A combination of key activities are undertaken to manage the risk such as developing compliance management plans, training staff and other stakeholders on relevant regulatory requirements, and monitoring compliance. Compliance with the Know-Your-Customer and anti-money laundering procedures and legislation became an area of major focus for the Group. The Group has a Compliance Officer who consults the country's Financial Intelligence Authority on money laundering and anti-terrorist financing matters.

## 6 Equities

CDH Investment bank did not have equities as at 31st December 2017.