



FIDELITY BANK PLC

CONDENSED UNAUDITED FINANCIAL STATEMENTS

FOR THE PERIOD ENDED

SEPTEMBER 30, 2019

FIDELITY BANK PLC

INTERIM STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
FOR THE PERIOD ENDED 30 SEPTEMBER 2019

	NOTES	Q3 2019	Q3 2018	YTD SEPT 2019	YTD SEPT 2018
		N'million	N'million	N'million	**N'million
Gross Earnings		57,399	46,705	161,055	139,001
Interest and similar income	6	48,268	41,095	132,558	117,764
Other interest and similar income	11	1,018	(744)	2,558	2,634
Interest and similar expense	7	(27,939)	(20,242)	(76,870)	(62,231)
Net interest income		21,347	20,110	58,246	58,168
Credit loss expense	8	(630)	(691)	4,843	(3,285)
Net interest income after credit loss expense		20,717	19,419	63,089	54,883
Fee and commission income	9	6,193	5,156	19,262	15,068
Fee and commission expense	9	(1,369)	(851)	(3,770)	(2,610)
Net Losses on derecognition of financial assets measured at amortised cost		-	-	(4,705)	-
Other operating income	10	1,920	1,197	6,676	3,535
Net gains from financial assets at fair val	11	200	29	329	(256)
Personnel expenses	12	(5,338)	(6,248)	(17,013)	(16,747)
Depreciation and amortisation	13	(1,512)	(816)	(3,889)	(3,632)
Other operating expenses	14	(12,858)	(10,833)	(36,976)	(30,177)
Profit before income tax		7,952	7,053	23,004	20,064
Income tax expense	15	(875)	(776)	(1,542)	(2,207)
PROFIT FOR THE PERIOD		7,078	6,277	21,462	17,857
Other comprehensive income:					
Items that will not be reclassified subsequently to profit or loss					
Revaluation gains on equity instruments at fair value through other comprehensive income*					
		(442)	-	5,917	103
Total items that will not be reclassified to profit or loss in subse		(442)	-	5,917	103
Items that will be reclassified subsequently to profit or loss					
Debt instruments at fair value through other comprehensive income*:					
- Net change in fair value during the period		(3,108)	-	1,136	(3,059)
- Changes in allowance for expected credit losses		(174)	-	-	(1)
- Reclassification adjustments to profit or loss		96	-	(29)	(372)
Net losses on debt instruments at fair value through other comprehensive income		(3,186)	-	1,107	(3,432)
Available-for-sale financial assets*:					
- Unrealised net gains arising during the period		-	-	-	-
- Net reclassification adjustments for realised net gains		-	-	-	-
Net gains on available-for-sale financial assets		-	-	-	-
Total items that will be reclassified to profit or loss in subseque		(3,186)	-	1,107	(3,432)
Other comprehensive (loss)/income for the year, net of tax		(3,628)	-	7,024	(3,329)
TOTAL COMPREHENSIVE INCOME FOR THE PERIOD		3,450	6,277	28,486	14,528
Earnings per share					
Basic and diluted (in kobo)	17	24	22	74	62

** Certain amounts in the comparative have been restated and do not correspond to the amount in the audited financial statements of the prior period presented

* Income from these instruments is exempted from tax

The accompanying notes to the interim financial statements are an integral part of these interim financial statements.

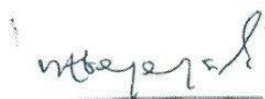
FIDELITY BANK PLC

**INTERIM STATEMENT OF FINANCIAL POSITION
AS AT 30 SEPTEMBER 2019**

		30 Sept 2019	30 Sept 2018	31 December 2018
	Notes	N'million	N'million	N'million
ASSETS				
Cash and balances with central bank	18	418,295	347,123	384,931
Due from banks	20	140,454	167,852	111,633
Loans and advances to customers	21	1,074,096	830,375	849,880
Investments:				
<i>Financial assets at fair value through profit or loss</i>	22.1	21,825	9,620	14,052
<i>Debt instruments at fair value through other comprehensive income</i>	22.2	93,532	138,940	157,639
<i>Equity instruments at fair value through other comprehensive income</i>	22.3	13,418	9,006	9,977
<i>Debt instruments at amortised cost</i>	22.4	117,856	97,237	118,662
Other assets	26	50,557	43,073	35,124
Property, plant and equipment	23	37,639	36,257	36,909
Right-of-use assets	25	1,324	-	-
Intangible assets	24	1,624	1,321	1,076
TOTAL ASSETS		1,970,621	1,680,804	1,719,883
LIABILITIES				
Deposits from customers	27	1,116,416	986,830	979,413
Current income tax payable	15	411	2,207	1,609
Other liabilities	28	335,568	270,441	298,623
Provision	29	2,098	1,873	3,343
Debts issued and other borrowed funds	30	294,401	227,066	242,479
TOTAL LIABILITIES		1,748,893	1,488,417	1,525,467
EQUITY				
Share capital	31	14,481	14,481	14,481
Share premium	32	101,272	101,272	101,272
Retained earnings	32	54,995	37,895	37,133
<i>Other equity reserves:</i>				
Statutory reserve	32	30,744	29,081	30,744
Small scale investment reserve (SSI)	32	764	2,194	764
Non-distributable regulatory reserve (NDR)	40	2,806	1,547	408
Fair value reserve	32	14,090	5,916	7,038
AGSMEIS reserve		2,576	-	2,576
TOTAL EQUITY		221,728	192,387	194,416
TOTAL LIABILITIES AND EQUITY		1,970,621	1,680,804	1,719,883

The accompanying notes to the interim financial statements are an integral part of these interim financial statements.

The Third Quarter financial statements were signed on behalf of the Board of Directors on **24 October 2019** by:



Victor Abejegah
Chief Financial Officer
FRC/2013/ICAN/00000001733



Nnamdi Okonkwo
Managing Director/ Chief Executive Officer
FRC/2014/ICA/00000006963

FIDELITY BANK PLC
INTERIM STATEMENT OF CHANGES IN EQUITY
FOR THE PERIOD ENDED 30 SEPTEMBER 2019

	Share capital	Share premium	Retained earnings	Statutory reserve	investment reserve	regulatory reserve	Fair value reserve	AGSMEIS Reserve	Total equity
	N'million	N'million	N'million	N'million	N'million	N'million	N'million		N'million
At 1 January 2019	14,481	101,272	37,133	30,744	764	408	7,038	2,576	194,416
Profit for the period	-	-	23,004	-	-	-	-	-	23,004
Other comprehensive income									
Net change in fair value of debt instrument at FVOCI	-	-	-	-	-	-	1,135	-	1,135
Net change in fair value of equity instrument at FVOCI	-	-	-	-	-	-	5,917	-	5,917
Changes in allowance for expected credit losses	-	-	-	-	-	-	-	-	-
Net reclassification adjustment for realised net gains	-	-	443	-	-	-	-	-	443
Total comprehensive income	-	-	23,447	-	-	-	7,052	-	30,499
Dividends paid	-	-	(3,187)	-	-	-	-	-	(3,187)
Transfers between reserves (Note 32)	-	-	(2,398)	-	-	2,398	-	-	-
At 30 September 2019	14,481	101,272	54,995	30,744	764	2,806	14,090	2,576	221,728

INTERIM STATEMENT OF CHANGES IN EQUITY
FOR THE PERIOD ENDED 30 SEPTEMBER 2018

Attributable to equity holders

	Share capital	Share premium	Retained earnings	Statutory reserve	Small scale investment reserve	Non-distributable regulatory reserve	Fair value reserve	AGSMEIS Reserve	Total equity
	N'million	N'million	N'million	N'million	N'million	N'million	N'million		N'million
At 1 January 2018	14,481	101,272	25,326	27,305	764	28,837	5,330	-	203,315
Impact of adopting IFRS 9 (Note 2.29)	-	-	(28,393)	-	-	-	3,915	-	(24,478)
Transfers between reserves (Note 32)	-	-	28,393	-	-	(28,393)	-	-	-
Restated opening balance under IFRS 9	14,481	101,272	25,326	27,305	764	444	9,245	-	178,837
Profit for the period	-	-	20,064	-	-	-	-	-	20,064
Other comprehensive income									
Net change in fair value of debt instrument at FVOCI	-	-	-	-	-	-	(3,059)	-	(3,059)
Net change in fair value of equity instrument at FVOCI	-	-	-	-	-	-	103	-	103
Changes in allowance for expected credit losses	-	-	-	-	-	-	(1)	-	(1)
Net reclassification adjustment for realised net gains	-	-	-	-	-	-	(372)	-	(372)
Total comprehensive income	-	-	20,064	-	-	-	(3,329)	-	16,735
Dividends paid	-	-	(3,186)	-	-	-	-	-	(3,186)
Transfers between reserves (Note 32)	-	-	(4,309)	1,776	1,430	1,103	-	-	-
At 30 September 2018	14,481	101,272	37,895	29,081	2,194	1,547	5,916	-	192,387

The accompanying notes to the interim financial statements are an integral part of these interim financial statements.

FIDELITY BANK PLC

**INTERIM STATEMENT OF CASH FLOWS
FOR THE PERIOD ENDED 30 SEPTEMBER 2019**

		30 Sept 2019 N'million	30 Sept 2018 N'million
	Note		
Operating Activities			
Cash flows used in operations	33	(49,578)	112,354
Interest received		121,373	77,505
Interest paid		(74,816)	(54,537)
Income tax paid	15c	(1,198)	(1,122)
Net cash flows from /(used in) operating activities		(4,219)	134,200
Investing activities			
Purchase of property, plant and equipment	23	(4,178)	(1,940)
Proceeds from sale of property and equipment		2,506	45
Purchase of intangible assets		(1,614)	(1,510)
Purchase of debt instruments at amortised cost		(40,986)	(34,413)
Purchase of debt instruments at FVOCI		(118,833)	(131,358)
Redemption of financial assets at amortised cost		45,752	134,118
Proceeds from sale of debt financial assets at FVOCI		141,199	55,468
Proceeds from sale of equity instrument at FVOCI	22.7	2,918	1,299
Dividends received	10	1,392	229
Net cash flows provided by investing activities		28,156	21,937
Financing activities			
Dividends paid		(3,187)	(3,186)
Lease Payments		(205)	-
Proceeds of debts issued and other borrowed funds	30	39,365	18,563
Repayment of debts issued and other borrowed funds	30	(61,720)	(27,862)
Net cash flows (used in)/ from financing activities		(25,747)	(12,485)
Net (decrease)/increase in cash and cash equivalents		(1,810)	143,653
Net foreign exchange difference on cash and cash equivalents		2,328	2,641
Cash and cash equivalents at 1 January	19	246,950	232,309
Cash and cash equivalents at 30 September	19	247,468	378,603

The accompanying notes to the interim financial statements are an integral part of these interim financial statements.

**Notes to the financial statements
for the period ended 30 September 2019**

1 Corporate information

These financial statements are for Fidelity Bank Plc (the "Bank"), a company incorporated in Nigeria on 19 November 1987. The registered office address of the Bank is at Fidelity Place, 1 Fidelity Bank Close Off Kofo Abayomi Street, Victoria-Island, Lagos, Nigeria.

The principal activity of the Bank is the provision of banking and other financial services to corporate and individual customers. Fidelity Bank Plc provides a full range of financial services including investment, commercial and retail banking.

2 Summary of significant accounting policies

2.1 Introduction to summary of significant accounting policies

The principal accounting policies adopted in the preparation of these financial statements are set out below. These policies have been consistently applied to the period presented, unless otherwise stated.

2.1.1 Basis of preparation

The Bank's interim financial statements for the nine months ended **30 September 2019** have been prepared in accordance with International Financial Reporting Standards ("IFRS") as issued by the International Accounting Standards Board ("IASB"). The Bank has applied IAS 34 - Interim Financial Reporting in preparing its interim financial statements and as such do not include all the information and disclosures required in the annual financial statements, and should be read in conjunction with the Bank's annual financial statements as at 31 December 2018.

Additional information required by national regulations is included where appropriate.

The interim financial statements comprise the statement of profit or loss and other comprehensive income, the statement of financial position, the statement of changes in equity, statement of cash flows and the notes.

The interim financial statements have been prepared in accordance with the assumption of going concern and items in the financial statements are measured at historical cost, except for financial assets measured at fair value.

The interim financial statements are presented in Naira, which is the Bank's presentation currency. The figures shown in the financial statements are stated in Naira millions unless otherwise stated.

2.1.2 Changes in accounting policies and disclosures

The accounting policies adopted in the preparation of the interim financial statements are consistent with those followed in the preparation of the Bank's annual financial statements for the year ended 31 December 2018, except for the adoption of new standards effective as of 1 January 2019. The Bank has not early adopted any other standard, interpretation or amendment that has been issued but is not yet effective.

The Bank applies, for the first time, IFRS 16 Leases that requires restatement of previous financial statements. As required by IAS 34, the nature and effect of these changes are disclosed below.

Several other amendments and interpretations are applied for the first time in 2019, but do not have an impact on the interim financial statements of the Bank.

IFRS 16 Leases

IFRS 16 supersedes IAS 17 Leases, IFRIC 4 Determining whether an Arrangement contains a Lease, SIC-15 Operating Leases-Incentives and SIC-27 Evaluating the Substance of Transactions Involving the Legal Form of a Lease. The standard sets out the principles for the recognition, measurement, presentation and disclosure of leases and requires lessees to account for most leases under a single on-balance sheet model.

Lessor accounting under IFRS 16 is substantially unchanged from IAS 17. Lessors will continue to classify leases as either operating or finance leases using similar principles as in IAS 17. Therefore, IFRS 16 did not have an impact for leases where the Bank is the lessor.

The Bank adopted IFRS 16 using the modified retrospective method of adoption with the date of initial application of 1 January 2019. The Bank elected to use the transition practical expedient allowing the standard to be applied only to contracts that were previously identified as leases applying IAS 17 and IFRIC 4 at the date of initial application. The Bank also elected to use the recognition exemptions for lease contracts that, at the commencement date, have a lease term of 12 months or less and do not contain a purchase option ('short-term leases'), and lease contracts for which the underlying asset is of low value ('low-value assets').

The effect of adoption IFRS 16 as at 1 January 2019 (increase/(decrease)) is as follows:

	N'million
Assets	
Right-of-use assets	1,490
Property, plant and equipment	(750)
Prepayments	(740)
Total assets	<u>-</u>
Total adjustment on equity (retained earnings)	<u>-</u>

The adoption of IFRS 16 does not give rise to a lease liability as the Bank does not have an enforceable right to renew or extend its leases as at the end of the reporting period and the non-cancellable periods have been fully paid.

Notes to the financial statements for the period ended 30 September 2019

2.1.2 Changes in accounting policies and disclosures continued

IFRS 16 Leases continued

(a) Nature of the effect of adoption of IFRS 16

The Bank has lease contracts for various buildings used as branches, offices and other outlets. Before the adoption of IFRS 16, the Bank classified each of its leases (as lessee) at the inception date as either a finance lease or an operating lease. A lease was classified as a finance lease if it transferred substantially all of the risks and rewards incidental to ownership of the leased asset to the Bank; otherwise it was classified as an operating lease. Finance leases were capitalised at the commencement of the lease at the inception date fair value of the leased property or, if lower, at the present value of the minimum lease payments. Lease payments were apportioned between interest (recognised as finance costs) and reduction of the lease liability. In an operating lease, the leased property was not capitalised and the lease payments were recognised as rent expense in profit or loss on a straight-line basis over the lease term. Any prepaid rent and accrued rent were recognised under Other assets and Other liabilities, respectively.

At the date of initial application of IFRS 16, the Bank does not have any lease classified as a finance lease (as lessee)

Upon adoption of IFRS 16, the Bank applied a single recognition and measurement approach for all leases, except for short-term leases and leases of low-value assets. The standard provides specific transition requirements and practical expedients, which have been applied by the Bank.

Leases previously accounted for as operating leases

The Bank recognised right-of-use assets and lease liabilities for those leases previously classified as operating leases, except for short-term leases and leases of low-value assets. The right-of-use assets for most leases were recognised based on the carrying amount as if the standard had always been applied, apart from the use of incremental borrowing rate at the date of initial application. In some leases, the right-of-use assets were recognised based on the amount equal to the lease liabilities, adjusted for any related prepaid and accrued lease payments previously recognised. Lease liabilities were recognised based on the present value of the remaining lease payments, discounted using the incremental borrowing rate at the date of initial application.

The Bank also applied the available practical expedients wherein it:

- * Used a single discount rate to a portfolio of leases with reasonably similar characteristics
- * Relied on its assessment of whether leases are onerous immediately before the date of initial application
- * Applied the short-term leases exemptions to leases with lease term that ends within 12 months at the date of initial application
- * Excluded the initial direct costs from the measurement of the right-of-use asset at the date of initial application
- * Used hindsight in determining the lease term where the contract contains options to extend or terminate the lease

(b) Summary of new accounting policies

Set out below are the new accounting policies of the Bank upon adoption of IFRS 16, which have been applied from the date of initial applicatio

Right-of-use assets

The Bank recognises right-of-use assets at the commencement date of the lease (i.e., the date the underlying asset is available for use). Right-of-use assets are measured at cost, less any accumulated depreciation and impairment losses, and adjusted for any remeasurement of lease liabilities. The cost of right-of-use assets includes the amount of lease liabilities recognised, initial direct costs incurred, and lease payments made at or before the commencement date less any lease incentives received. Unless the Bank is reasonably certain to obtain ownership of the leased asset at the end of the lease term, the recognised right-of-use assets are depreciated on a straight-line basis over the shorter of its estimated useful life and the lease term. Right-of-use assets are subject to impairment.

Lease liabilities

At the commencement date of the lease, the Bank recognises lease liabilities measured at the present value of lease payments to be made over the lease term. The lease payments include fixed payments (including in-substance fixed payments) less any lease incentives receivable, variable lease payments that depend on an index or a rate, and amounts expected to be paid under residual value guarantees. The lease payments also include the exercise price of a purchase option reasonably certain to be exercised by the Bank and payments of penalties for terminating a lease, if the lease term reflects the Bank exercising the option to terminate. The variable lease payments that do not depend on an index or a rate are recognised as expense in the period on which the event or condition that triggers the payment occurs.

In calculating the present value of lease payments, the Bank uses the incremental borrowing rate at the lease commencement date if the interest rate implicit in the lease is not readily determinable. After the commencement date, the amount of lease liabilities is increased to reflect the accretion of interest and reduced for the lease payments made. In addition, the carrying amount of lease liabilities is remeasured if there is a modification, a change in the lease term, a change in the in-substance fixed lease payments or a change in the assessment to purchase the underlying asset.

Short-term leases and leases of low-value assets

The Bank applies the short-term lease recognition exemption to its **short-term leases** (i.e., those leases that have a lease term of 12 months or less from the commencement date and do not contain a purchase option). It also applies the lease of **low-value assets recognition exemption to leases** (i.e., below \$5,000). Lease payments on short term leases and leases of low-value assets are recognised as expense on a straight-line basis over the lease term.

For policy applicable before 1 January 2019, see Note 2.9

Notes to the financial statements for the period ended 30 September 2019

2.1.2 Changes in accounting policies and disclosures continued

IFRS 16 Leases continued

(c) Below is a list of other interpretations and amendment that were effective for the first time in 2019 but do not have a significant impact on the Bank:

- i IFRIC Interpretation 23 Uncertainty over Income Tax Treatment
- ii Amendments to IFRS 9: Prepayment Features with Negative Compensation
- iii Amendments to IAS 19: Plan Amendment, Curtailment or Settlement
- iv Amendments to IAS 28: Long-term interests in associates and joint ventures
- v Annual Improvements 2015-2017 Cycle
 - (a) IFRS 3 Business Combinations
 - (b) IFRS 11 Joint Arrangements
 - (c) IAS 12 Income Taxes
 - (d) IAS 23 Borrowing Costs

2.1.3 Significant accounting judgements, estimates and assumptions

The preparation of the Bank's interim financial statements requires management to make judgements, estimates and assumptions that affect the reported amount of revenues, expenses, assets and liabilities and the accompanying disclosure, as well as the disclosure of contingent liability about these assumption and estimates that could result in outcome that require a material adjustment to the carrying amount of assets and liabilities affected in future periods.

Management discusses with the Audit Committee the development, selection and disclosure of the Bank's critical accounting policies and estimates, and the application of these policies and estimates.

ESTIMATES AND ASSUMPTIONS

The key assumption concerning the future and other key sources of estimation uncertainty at the reporting date, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial period, are described below. The Bank based its assumption and estimates on parameters available when the interim financial statements were prepared. Existing circumstances and assumption about future developments, however, may change due to market changes or circumstances beyond the control of the Bank. Such changes are reflected in the assumptions when they occur.

Going Concern

The Bank's management has made an assessment of its ability to continue as a going concern and is satisfied that it has the resources to continue in the business for the foreseeable future. Furthermore, management is not aware of any material uncertainties that may cast significant doubt upon the Bank's ability to continue as a going concern. Therefore, the interim financial statements continue to be prepared on the going concern basis.

Allowances for credit losses

Measurement of the expected credit loss allowance

The measurement of the expected credit loss allowance for financial assets measured at amortised cost and FVOCI is an area that requires the use of complex models and significant assumptions about future economic conditions and credit behaviour (e.g. the likelihood of customers defaulting and the resulting losses). Explanation of the inputs, assumptions and estimation techniques used in measuring ECL is further detailed in Note 3, which also sets out key sensitivities of the ECL to changes in these elements.

A number of significant judgements are also required in applying the accounting requirements for measuring ECL,

- * Determining criteria for significant increase in credit risk;
- * Choosing appropriate models and assumptions for the measurement of ECL;
- * Establishing the number and relative weightings of forward-looking scenarios for each type of product/market and the associated EC
- * Establishing groups of similar financial assets for the purposes of measuring ECL.

Notes to the financial statements for the period ended 30 September 2019

2.1.3 Significant accounting judgements, estimates and assumptions *continued*

Determination of collateral Value

Management monitors market value of collateral in a regular basis. Management uses its experienced judgement on independent opinion to adjust the fair value to reflect the current circumstances. The amount and collateral required depend on the assessment of credit risk of the counterpart

The Directors believes that the underlying assumptions are appropriate and that the Bank's interim financial statements therefore present the financial position and results fairly. The areas involving a higher degree of judgement or complexity, or areas where assumptions and estimates are significant to the financial statements, are disclosed in the notes.

Fair value measurement of financial instruments

When the fair values of financial assets and financial liabilities recorded in the statement of financial position cannot be measured based on quoted prices in active markets, their fair values are measured using valuation techniques including the discounted cash flow (DCF) model. The inputs to these models are taken from observable markets where possible, but where this is not feasible, a degree of judgement is required in establishing fair values. Judgements include considerations of inputs such as liquidity risk, credit risk and volatility changes in assumptions about these factors could affect the reported fair value of financial instruments. See Note 3.5 for further disclosures.

JUDGEMENTS

In the process of applying the Bank's accounting policies, management has made the following judgements, which have significant effect on the amount recognised in the interim financial statements:

Depreciation and carrying value of property, plant and equipment

The estimation of the useful lives of assets is based on management's judgement. Any material adjustment to the estimated useful lives of items of property and equipment will have an impact on the carrying value of these items.

Significant judgement in determining the lease term of contracts with renewal options

The Bank determines the lease term as the non-cancellable term of the lease, together with any periods covered by an option to extend the lease if it is reasonably certain to be exercised, or any periods covered by an option to terminate the lease, if it is reasonably certain not to be exercised.

The Bank applies judgement in evaluating whether it is reasonably certain to exercise the option to renew. That is, it considers all relevant factors that create an economic incentive for it to exercise the renewal. After the commencement date, the Bank reassesses the lease term if there is a significant event or change in circumstances that is within its control and affects its ability to exercise (or not to exercise) the option to renew (e.g., a change in business strategy).

2.2 Standards issued but not yet effective

The new and amended standards and interpretations that are issued, but not yet effective, up to the date of issuance of the Bank's interim financial statements are disclosed below. The Bank intends to adopt these new and amended standards and interpretations, if applicable, when they become effective.

IFRS 17 Insurance Contracts

In May 2017, the IASB issued IFRS 17 Insurance Contracts (IFRS 17), a comprehensive new accounting standard for insurance contracts covering recognition and measurement, presentation and disclosure. Once effective, IFRS 17 will replace IFRS 4 Insurance Contracts (IFRS 4) that was issued in 2005. IFRS 17 applies to all types of insurance contracts (i.e., life, non-life, direct insurance and re-insurance), regardless of the type of entities that issue them, as well as to certain guarantees and financial instruments with discretionary participation features.

A few scope exceptions will apply. The overall objective of IFRS 17 is to provide an accounting model for insurance contracts that is more useful and consistent for insurers. In contrast to the requirements in IFRS 4, which are largely based on grandfathering previous local accounting policies, IFRS 17 provides a comprehensive model for insurance contracts, covering all relevant accounting aspects. The core of IFRS 17 is the general model, supplemented by:

- * A specific adaptation for contracts with direct participation features (the variable fee approach)
- * A simplified approach (the premium allocation approach) mainly for short-duration contracts

IFRS 17 is effective for reporting periods beginning on or after 1 January 2021, with comparative figures required. Early application is permitted, provided the entity also applies IFRS 9 and IFRS 15 on or before the date it first applies IFRS 17.

IFRS 17 will have no impact on the Bank, as it does not issue insurance contract.

Amendments to IFRS 10 and IAS 28: Sale or Contribution of Assets between an Investor and its Associate or Joint Venture

The amendments address the conflict between IFRS 10 and IAS 28 in dealing with the loss of control of a subsidiary that is sold or contributed to an associate or joint venture. The amendments clarify that the gain or loss resulting from the sale or contribution of assets that constitute a business, as defined in IFRS 3, between an investor and its associate or joint venture, is recognised in full. Any gain or loss resulting from the sale or contribution of assets that do not constitute a business, however, is recognised only to the extent of unrelated investors' interests in the associate or joint venture. The IASB has deferred the effective date of these amendments indefinitely, but an entity that early adopts the amendments must apply them prospectively. These amendments will currently have no impact on the financial statements of the Bank.

The Bank will apply these amendments when they become effective.

Notes to the financial statements for the period ended 30 September 2019

2.2 Standards issued but not yet effective *continued*

Definition of a Business - Amendments to IFRS 3

The IASB issued amendments to the definition of a business in IFRS 3 Business Combinations to help entities determine whether an acquired set of activities and assets is a business or not. They clarify the minimum requirements for a business, remove the assessment of whether market participants are capable of replacing any missing elements, add guidance to help entities assess whether an acquired process is substantive, narrow the definitions of a business and of outputs, and introduce an optional fair value concentration test. These amendments will currently have no impact on the financial statements of the Bank.

The Bank will apply this amendment when it becomes effective on 1 January 2020.

The Conceptual Framework for Financial Reporting

The IASB issued the Conceptual Framework in March 2018. It sets out a comprehensive set of concepts for financial reporting, standard setting, guidance for preparers in developing consistent accounting policies and assistance to others in their efforts to understand and interpret the standards. The Conceptual Framework includes some new concepts, provides updated definitions and recognition criteria for assets and liabilities and clarifies some important concepts. It is arranged in eight chapters, as follows:

- Chapter 1 – The objective of financial reporting
- Chapter 2 – Qualitative characteristics of useful financial information
- Chapter 3 – Financial statements and the reporting entity
- Chapter 4 – The elements of financial statements
- Chapter 5 – Recognition and derecognition
- Chapter 6 – Measurement
- Chapter 7 – Presentation and disclosure
- Chapter 8 – Concepts of capital and capital maintenance

The Conceptual Framework is accompanied by a Basis for Conclusions. The Board has also issued a separate accompanying document, Amendments to References to the Conceptual Framework in IFRS Standards, which sets out the amendments to affected standards in order to update references to the Conceptual Framework. In most cases, the standard references are updated to refer to the Conceptual Framework. There are exemptions in developing accounting policies for regulatory account balances for two standards, namely, IFRS 3 and for those applying IAS 8. These amendments will currently have no impact on the financial statements of the Bank.

The Bank will apply this amendment when it becomes effective on 1 January 2020.

Definition of Material - Amendments to IAS 1 and IAS 8

In October 2018, the IASB issued amendments to IAS 1 Presentation of Financial Statements and IAS 8 to align the definition of 'material' across the standards and to clarify certain aspects of the definition. The new definition states that, 'Information is material if omitting, misstating or obscuring it could reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements, which provide financial information about a specific reporting entity.' The amendments clarify that materiality will depend on the nature or magnitude of information, or both. An entity will need to assess whether the information, either individually or in combination with other information, is material in the context of the financial statements. These amendments will currently have no impact on the financial statements of the Bank.

The Bank will apply this amendment when it becomes effective on 1 January 2020.

2.3 Foreign currency translation and transaction

(a) *Functional and presentation currency*

Items included in the interim financial statements of the Bank are measured using the currency of the primary economic environment in which the entity operates ("the functional currency").

The interim financial statements are presented in Naira, which is the Bank's presentation currency.

(b) *Transactions and balances*

Foreign currency transactions (i.e. transactions denominated, or that require settlement, in a currency other than the functional currency) are translated into the functional currency using the exchange rates prevailing at the dates of the transactions or valuation where items are re-measured.

Monetary items denominated in foreign currency are translated with the closing rate as at the reporting date. Nonmonetary items measured at historical cost denominated in a foreign currency are translated with the exchange rate as at the date of initial recognition; non-monetary items in a foreign currency that are measured at fair value are translated using the exchange rates at the date when the fair value was determined.

Foreign exchange gains and losses resulting from the settlement of foreign currency transactions and from the translation at period-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognised in the profit or loss.

In the case of changes in the fair value of monetary assets denominated in foreign currency classified as fair value through other comprehensive income (FVOCI), a distinction is made between translation differences resulting from changes in amortised cost of the security and other changes in the carrying amount of the security. Translation differences related to changes in the amortised cost are recognised in profit or loss, and other changes in the carrying amount, except impairment, are recognised in other comprehensive income.

Translation differences on non-monetary financial instruments, such as equities held at fair value through profit or loss, are reported as part of the fair value gain or loss. Translation differences on non-monetary financial instruments, such as equities classified as FVOCI financial assets, are included in other comprehensive income.

Notes to the financial statements for the period ended 30 September 2019

2.4 Financial assets and liabilities

2.4.1 Initial recognition

The Bank initially recognises loans and advances, deposits and debt securities issued on the date on which they are originated. All other financial instruments (including regular-way purchases and sales of financial assets) are recognised on the trade date, which is the date on which the Bank becomes a party to the contractual provisions of the instrument.

A financial asset or financial liability is measured initially at fair value plus, (for an item not at fair value through profit or loss), transaction costs that are directly attributable to its acquisition or issue. Transaction costs of financial assets carried at fair value through profit or loss are expensed in profit or loss.

Day 1 profit or loss

When the transaction price of the instrument differs from the fair value at origination and the fair value is based on a valuation technique using only inputs observable in market transactions, the Bank recognises the difference between the transaction price and fair value in Net gains/(losses) from financial instruments. In those cases where fair value is based on models for which some of the inputs are not observable, the difference between the transaction price and the fair value is deferred and is only recognised in profit or loss when the inputs become observable, or when the instrument is derecognised.

Amortised cost and gross carrying amount

The amortised cost of a financial asset or financial liability is the amount at which the financial asset or financial liability is measured on initial recognition minus the principal repayments, plus or minus the cumulative amortisation using the effective interest method of any difference between the initial amount and the maturity amount and, for financial assets, adjusted for any expected credit loss allowance.

The gross carrying amount of a financial asset is the amortised cost of a financial asset before adjusting for any expected credit loss allowance.

Effective interest method

The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial asset or financial liability to the gross carrying amount of a financial asset (i.e. its amortised cost before any impairment allowance) or to the amortised cost of a financial liability. The calculation does not consider expected credit losses and includes transaction costs, premiums or discounts and fees and points paid or received that are integral to the effective interest rate, such as origination fees.

For purchased or originated credit-impaired (POCI) financial assets — assets that are credit-impaired at initial recognition — the Bank calculates the credit-adjusted effective interest rate, which is calculated based on the amortised cost of the financial asset instead of its gross carrying amount and incorporates the impact of expected credit losses in estimated future cash flows.

When the Bank revises the estimates of future cash flows, the carrying amount of the respective financial assets or financial liability is adjusted to reflect the new estimate discounted using the original effective interest rate. Any changes are recognised in profit or loss.

Interest income

Interest income and expenses are recognised in profit or loss using the effective interest method. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument to:

- * the gross carrying amount of the financial asset; or
- * the amortised cost of the financial liability.

When calculating the effective interest rate for financial instruments other than credit-impaired financial assets, the Bank estimates future cash flows considering all contractual terms of the financial instrument, but not expected credit losses. For credit-impaired financial assets, a credit-adjusted effective interest rate is calculated using estimated future cash flows including expected credit losses.

2.4.2 Financial assets - Subsequent measurement

a) Debt instruments

The classification and subsequent measurement of debt instruments depend on the Bank's business model for managing the financial assets and the contractual terms of the cash flows. Based on these factors, the Bank classifies its debt instruments into one of the following measurement categories:

Amortised cost: Financial assets that are held within a business model whose objective is collection of contractual cash flows and where such cash flows represent solely payments of principal and interest are measured at amortised cost. A gain or loss due to impairment or upon derecognition of a debt investment that is subsequently measured at amortised cost is recognised in profit or loss. Interest income from these financial assets is included in "Interest and similar income" using the effective interest rate method.

Fair value through other comprehensive income (FVOCI): Financial assets that are held within a business model whose objective is achieved both by collection of contractual cash flows and by selling the assets, where those cash flows and by selling the assets, where those cash flows represent solely payments of principal and interest, and are not designated at fair value through profit or loss, are measured at fair value through other comprehensive income. Movements in the carrying amount are taken through OCI, except for recognition of impairment gains and losses, interest revenue and foreign exchange gains and losses on the instrument's amortised cost which are recognised in profit or loss.

When the financial asset is derecognised, the cumulative gain or loss previously recognised in OCI is reclassified from equity to profit or loss and recognised in "Other operating income". Interest income from these financial assets is included in "Interest and similar income" using the effective interest rate method.

Notes to the financial statements for the period ended 30 September 2019

2.4 Financial assets and liabilities *continued*

2.4.2 Financial assets - Subsequent measurement *continued*

Fair value through profit or loss (FVTPL): Assets that do not meet the criteria for amortised cost or FVOCI are measured at fair value through profit or loss. A gain or loss on a debt investment that is subsequently measured at fair value through profit or loss is recognised in profit or loss and presented in the profit or loss statement within "Net gains/(losses) from financial instruments classified as held for trading" in the period in which it arises. Interest income from these financial assets is included in "Interest and similar income".

Business Model assessment

The Bank makes an assessment of the objective of a business model in which an asset is held at a portfolio level because this best reflects the way the business is managed and information is provided to management. The information considered includes:

- * the stated policies and objectives for the portfolio and the operation of those policies in practice. In particular, whether management's strategy focuses on earning contractual interest revenue, maintaining a particular interest rate profile, matching the duration of the financial assets to the duration of the liabilities that are funding those assets or realising cash flows through the sale of the assets;
- * how the performance of the portfolio is evaluated and reported to the Bank's management;
- * the risks that affect the performance of the business model (and the financial assets held within that business model) and how those risks are managed;
- * how managers of the business are compensated - e.g. whether compensation is based on the fair value of the assets managed or the contractual cash flows collected.
- * the frequency, volume and timing of sales in prior periods, the reasons for such sales and its expectations about future sales activity. However, information about sales activity is not considered in isolation, but as part of an overall assessment of how the Bank's stated objective for managing financial assets is achieved and how cash flows are realized.

Solely payments of principal and interest (SPPI) assessment

Principal is defined as the fair value of the financial asset on initial recognition. Interest is defined as consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs (e.g. liquidity risk and administrative costs), as well as profit margin.

In assessing whether the contractual cash flows are solely payments of principal and interest, the Bank considers the contractual terms of the instrument. This includes assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition. In making the assessment, the Bank considers:

- * contingent events that would change the amount and timing of cash flows;
- * leverage features;
- * prepayment and extension terms;
- * terms that limit the Bank's claim to cash flows from specified assets (e.g. non-recourse asset arrangements); and
- * features that modify consideration of the time value of money - e.g. periodical rate of interest

Financial assets with embedded derivatives are considered in their entirety when determining whether their cash flows are solely payments of principal and interest.

Reclassifications

The Bank reclassifies debt investments when and only when its business model for managing those assets changes.

Modifications

If the terms of a financial asset are modified, the Bank evaluates whether the cash flows of the modified asset are substantially different. If the cash flows are substantially different, then the contractual rights to cash flows from the original financial asset are deemed to have expired. In this case, the original financial asset is derecognised and a new financial asset is recognised at fair value.

If the cash flows of the modified asset carried at amortised cost are not substantially different, then the modification does not result in derecognition of the financial asset. In this case, the Bank recalculates the gross carrying amount of the financial asset and recognises the amount arising from adjusting the gross carrying amount as a modification gain or loss in profit or loss. If such a modification is carried out because of financial difficulties of the borrower, then the gain or loss is presented together with impairment losses.

(b) **Equity instruments**

The Bank subsequently measures all unquoted equity investments at fair value through other comprehensive income. Where the Bank has elected to present fair value gains and losses on equity investments in other comprehensive income, there is no subsequent reclassification of fair value gains and losses to profit or loss. Dividends from such investments continue to be recognised in profit or loss as other income when the right to receive payments is established.

Notes to the financial statements for the period ended 30 September 2019

2.4 Financial assets and liabilities *continued*

2.4.3 Impairment of financial assets

Overview of the ECL principles

The Bank assesses on a forward looking basis the expected credit losses (ECL) associated with its loans and other debt financial assets not held at FVPL, together with loan commitments and financial guarantee contracts, in this section all referred to as 'financial instruments'. The impairment methodology applied depends on whether there has been a significant increase in credit risk since initial recognition.

The measurement of ECL reflects an unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes, time value of money and reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions. Equity instruments are not subject to impairment under IFRS 9.

The ECL allowance is based on the credit losses expected to arise over the life of the asset (the lifetime expected credit loss or LTECL), unless there has been no significant increase in credit risk since origination, in which case, the allowance is based on the 12 months' expected credit loss (12mECL). The 12mECL is the portion of LTECLs that represent the ECLs that result from default events on a financial instrument that are possible within the 12 months after the reporting date.

Both LTECLs and 12mECLs are calculated on either an individual basis or a collective basis, depending on the nature of the underlying portfolio of financial instruments.

The Bank has established a policy to perform an assessment, at the end of each reporting period, of whether a financial instrument's credit risk has increased significantly since initial recognition, by considering if it is 30 days past due. Based on the above process, the Bank groups its loans into Stage 1, Stage 2 and Stage 3, as described below:

- * **Stage 1:** When loans are first recognised, the Bank recognises an allowance based on 12 months expected credit losses (12mECLs). Stage 1 loans also include facilities where the credit risk has improved and the loan has been reclassified from Stage 2.
- * **Stage 2:** When a loan has shown a significant increase in credit risk since origination, the Bank records an allowance for the lifetime expected credit losses (LTECLs). Stage 2 loans also include facilities, where the credit risk has improved and the loan has been reclassified from Stage 3.
- * **Stage 3:** These are loans considered as credit-impaired. The bank records an allowance for the LTECLs.

POCI: Purchased or originated credit impaired (POCI) assets are financial assets that are credit impaired on initial recognition. POCI assets are recorded at fair value at original recognition and interest income is subsequently recognised based on a credit-adjusted EIR. ECLs are only recognised or released to the extent that there is a subsequent change in the expected credit losses

The calculations of ECLs

The Bank calculates ECLs based on a single scenario to measure the expected cash shortfalls, discounted at an approximation to the EIR. A cash shortfall is the difference between the cash flows that are due to an entity in accordance with the contract and the cash flows that the entity expects to receive.

The mechanics of the ECL calculations are outlined below and the key elements are, as follows:

PD: The Probability of Default is an estimate of the likelihood of default over a given time horizon. A default may only happen at a certain time over the assessed period, if the facility has not been previously derecognised and is still in the portfolio. The concept of PDs is further explained in Note 3.2.4.

EAD: The Exposure at Default is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date, including repayments of principal and interest, whether scheduled by contract or otherwise, expected drawdowns on committed facilities, and accrued interest from missed payments. The EAD is further explained in Note 3.2.4.

LGD: The Loss Given Default is an estimate of the loss arising in the case where a default occurs at a given time. It is based on the difference between the contractual cash flows due and those that the lender would expect to receive, including from the realisation of any collateral. It is usually expressed as a percentage of the EAD. The LGD is further explained in Note 3.2.4

When estimating the ECLs, the Bank considers only a single scenario which is considered to be the most likely scenario. When relevant, the assessment also incorporates how defaulted loans are expected to be recovered, including the probability that the loans will cure and the value of collateral or the amount that might be received for selling the asset.

The maximum period for which the credit losses are determined is the contractual life of a financial instrument unless the Bank has the legal right to call it earlier, with the exception of revolving facilities which could extend beyond the contractual life.

Provisions for ECLs for undrawn loan commitments are assessed as set out below. The calculation of ECLs (including the ECLs related to the undrawn element) for revolving facilities is explained in Note 3.2.4 (c).

The mechanics of the ECL method are summarised below:

Stage 1

The 12mECL is calculated as the portion of LTECLs that represent the ECLs that result from default events on a financial instrument that are possible within the 12 months after the reporting date. The Bank calculates the 12mECL allowance based on the expectation of a default occurring in the 12 months following the reporting date.

These expected 12-month default probabilities are applied to a forecast EAD and multiplied by the expected LGD and discounted by an approximation to the original EIR.

Notes to the financial statements for the period ended 30 September 2019

2.4 Financial assets and liabilities *continued*

2.4.3 Impairment of financial assets *continued*

Stage 2

When a financial instrument has shown a significant increase in credit risk since origination, the Bank records an allowance for the LTECLs. The mechanics are similar to those explained above but PDs and LGDs are estimated over the lifetime of the instrument. The expected cash shortfalls are discounted by an approximation to the original EIR.

Stage 3

For financial instruments considered credit-impaired (as defined in Note 3), the Bank recognises the lifetime expected credit losses for these loans. The method is similar to that for Stage 2 assets, with the PD set at 100%.

POCI

POCI assets are financial assets that are credit impaired on initial recognition. The Bank only recognises the cumulative changes in lifetime ECLs since initial recognition, discounted by the credit-adjusted EIR.

Loan commitments and letters of credit

When estimating LTECLs for undrawn loan commitments, the Bank estimates the expected portion of the loan commitment that will be drawn down over its expected life. The ECL is then based on the present value of the expected shortfalls in cash flows if the loan is drawn down. The expected cash shortfalls are discounted at an approximation to the expected EIR on the loan.

For revolving facilities that include both a loan and an undrawn commitment, ECLs are calculated and presented together with the loan. For loan commitments and letters of credit, the ECL is recognised within provisions.

Financial guarantee contracts

The Bank's liability under each guarantee is measured at the higher of the amount initially recognised less cumulative amortisation recognised in the profit or loss, and the ECL provision. For this purpose, the Bank estimates ECLs based on the present value of the expected payments to reimburse the holder for a credit loss that it incurs. The shortfalls are discounted by the risk-adjusted interest rate relevant to the exposure. The ECLs related to financial guarantee contracts are recognised within Provisions.

Bank overdraft and other revolving facilities

The Bank's product offering includes a variety of corporate and retail overdraft and credit cards facilities, in which the Bank has the right to cancel and/or reduce the facilities with one day's notice. The Bank does not limit its exposure to credit losses to the contractual notice period, but, instead calculates ECL over a period that reflects the Bank's expectations of the customer behaviour, its likelihood of default and the Bank's future risk mitigation procedures, which could include reducing or cancelling the facilities.

Restructured financial assets

If the terms of a financial asset are renegotiated or modified or an existing financial asset is replaced with a new one due to financial difficulties of the borrower, then an assessment is made of whether the financial asset should be derecognised and ECL is measured as follows:

- if the expected restructuring will not result in derecognition of the existing asset, then the expected cash flows arising from the modified financial asset are included in calculating cash shortfalls from the existing asset.
- if the expected restructuring will result in derecognition of the existing asset, then the expected fair value of the new asset is treated as the final cash flow from the existing financial asset at the time of its derecognition. This amount is included in calculating the cash shortfalls from the existing financial asset that are discounted from the expected date of derecognition to the reporting date using the original effective interest rate of the existing financial asset.

Credit-impaired financial assets

At each reporting date, the Bank assesses whether financial assets carried at amortised cost and debt instruments carried at FVOCI are credit-impaired. Financial assets are credit-impaired when one or more events that have a detrimental impact on the estimated future cash flows of the financial asset have occurred.

Evidence that a financial asset is credit-impaired includes the following:

- there is significant financial difficulty of a customer/issuer/obligor (potential bad debt indicator);
- there is a breach of contract, such as a default or delinquency in interest or principal payments;
- the Bank, for economic or legal reasons relating to the borrower's financial difficulty, granting to the borrower a concession that the Bank would not otherwise consider.
- it becomes probable that a counterparty/borrower may enter bankruptcy or other financial reorganisation;
- there is the disappearance of an active market for a financial asset because of financial difficulties; or
- observable data indicates that there is a measurable decrease in the estimated future cash flows from a group of financial assets.
- the financial asset is 90 days past due

A loan that has been renegotiated due to a deterioration in the borrower's financial condition is usually considered to be credit-impaired unless there is evidence that the risk of not receiving contractual cash flows has reduced significantly and there are no other indicators of impairment. In addition, a loan that is overdue for 90 days or more is considered impaired.

Notes to the financial statements for the period ended 30 September 2019

2.4 Financial assets and liabilities *continued*

2.4.3 Impairment of financial assets *continued*

Collateral valuation

To mitigate its credit risks on financial assets, the Bank seeks to use collateral, where possible. The collateral comes in various forms, such as cash, securities, letters of credit/guarantees, real estate, receivables, inventories, other non-financial assets and credit enhancements such as netting agreements. The Bank's accounting policy for collateral assigned to it through its lending arrangements under IFRS 9 is the same as it was under IAS 39. Collateral, unless repossessed, is not recorded on the Bank's statement of financial position. However, the fair value of collateral affects the calculation of ECLs. It is generally assessed, at a minimum, at inception and re-assessed on a quarterly basis. However, some collateral, for example, cash or securities relating to margining requirements, is valued daily. Details of the impact of the Bank's various credit enhancements are disclosed in Note 3.

To the extent possible, the Bank uses active market data for valuing financial assets held as collateral. Other financial assets which do not have readily determinable market values are valued using models. Non-financial collateral, such as real estate, is valued based on data provided by third parties such as mortgage brokers, or based on housing price indices.

Collateral repossessed

The Bank determines whether a repossessed asset can be best used for its internal operations or should be sold. Assets determined to be useful for the internal operations are transferred to their relevant asset category at the lower of their repossessed value or the carrying value of the original secured asset. Assets for which selling is determined to be a better option are transferred to assets held for sale at their fair value (if financial assets) and fair value less cost to sell for non-financial assets at the repossession date in, line with the Bank's policy.

In its normal course of business, the Bank does not physically repossess properties or other assets in its retail portfolio, but engages external agents to recover funds, generally at auction, to settle outstanding debt. Any surplus funds are returned to the customers/obligors. As a result of this practice, the residential properties under legal repossession processes are not recorded on the statement of financial position.

2.4.4 Presentation of allowance for ECL

Loan allowances for ECL are presented in the statement of financial position as follows:

- financial assets measured at amortised cost: as a deduction from the gross carrying amount of the assets;
- loan commitments and financial guarantee contracts: the loss allowance is recognised as a provision;
- where a financial instrument includes both a drawn and an undrawn component, and the Bank cannot identify the ECL on the loan commitment component separately from those on the drawn component: the Bank presents a combined loss allowance for both components. The combined amount is presented as a deduction from the gross carrying amount of the drawn component. Any excess of the loss allowance over the gross amount of the drawn component is presented as a provision; and
- debt instruments measured at FVOCI: no loss allowance is recognised in the statement of financial position because the carrying amount of these assets is their fair value. However, the loss allowance is disclosed and is recognised in the fair value reserve.

Write-off

The Bank writes off financial assets, in whole or part, when it has exhausted all practical recovery efforts and has concluded there is no reasonable expectation of recovery. Indicators that there is no reasonable expectation of recovery include ceasing enforcement activity and where the Bank's recovery method is foreclosing on collateral and the value of the collateral is such that there is no reasonable expectation of recovering in full.

The Bank may write-off financial assets that are still subject to enforcement activity.

2.4.5 Financial liabilities

Initial and subsequent measurement

Financial liabilities are initially measured at their fair value, except in the case of financial liabilities recorded at FVPL, transaction costs are added to, or subtracted from, this amount. Financial liabilities, other than loan commitments and financial guarantees, are measured at amortised cost or at FVPL when they are held for trading and derivative instruments or the fair value designation is applied.

After initial measurement, debt issued and other borrowed funds are subsequently measured at amortised cost. Amortised cost is calculated by taking into account any discount or premium on issue funds, and costs that are an integral part of the EIR. The Bank classifies financial liabilities as held for trading when they have been purchased or issued primarily for short-term profit making through trading activities or form part of a portfolio of financial instruments that are managed together, for which there is evidence of a recent pattern of short-term profit taking. Held-for-trading liabilities are recorded and measured in the statement of financial position at fair value.

In both the current and prior period, all financial liabilities are classified and subsequently measured at amortised cost.

Notes to the financial statements for the period ended 30 September 2019

2.4.5 Financial liabilities *continued*

Derecognition

Financial liabilities are derecognised when they are extinguished i.e. When the obligation specified in the contract is discharged, cancelled or expires.

The exchange between the Bank and its original lenders of debt instruments with substantially different terms, as well as substantial modifications of the terms of existing financial liabilities, is accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability. The terms are substantially different if the discounted present value of the cash flows under the new terms, including any fees paid net of any fees received and discounted using the original effective interest rate, is at least 10% different from the discounted present value of the remaining cash flows of the original financial liability. In addition, other qualitative factors, such as the currency that the instrument is denominated in, changes in the type of interest rate, new conversion features attached to the instrument and change in covenants are also taken into consideration.

If an exchange of debt instruments or modification of terms is accounted for as an extinguishment, any costs or fees incurred are recognised as part of the gain or loss on the extinguishment. If the exchange or modification is not accounted for as an extinguishment, any costs or fees incurred adjust the carrying amount of the liability and are amortised over the remaining term of the modified liability.

Financial guarantee contracts and loan commitments

Financial guarantees contracts are contracts that require the Bank to make specified payments to reimburse the holder for a loss that it incurs because a specified debtor fails to make payment when it is due in accordance with the terms of the debt instrument. Such financial guarantees are given to banks, financial institutions and others on behalf of customers to secure loans, overdrafts and other banking facilities.

Loan commitments are firm commitments to provide credit under pre-specified terms and conditions.

Financial guarantees issued or commitments to provide a loan at below-market interest rate are initially measured at fair value and the initial fair value is amortised over the life of the guarantee or the commitment. Subsequently, they are measured at the higher of the amount of loss allowance and the premium received on initial recognition less income recognised in accordance with the principles of IFRS 15.

For loan commitments and financial guarantee contracts, the loss allowance is recognised as a provision. However, for contracts that include both a loan and an undrawn commitment and the Bank cannot separately identify the expected credit losses on the undrawn commitment component from those on the loan component, the expected credit losses on the undrawn commitment are recognised together with the loss allowance for the loan. To the extent that the combined expected credit losses exceed the gross carrying amount of the loan, the expected credit losses are recognised as a provision.

2.5 Revenue recognition

Interest Income and expense

Interest income and expense for all interest-bearing financial instruments are recognised within 'Interest income' and 'Interest expense' in the Statement of profit or loss and other comprehensive income using the effective interest method.

Fees and commission income

Fees and commissions are generally recognised on an accrual basis when the service has been provided in line with the requirement of IFRS 15 - Revenue from Contracts with Customers. Loan commitment fees for loans that are likely to be drawn down are deferred (together with related direct costs) and recognised as an adjustment to the effective interest rate on the loan. Loan syndication fees are recognised as revenue when the syndication has been completed and the Bank has retained no part of the loan package for itself or has retained a part at the same effective interest rate as the other participants. Commission and fees arising from negotiating, or participating in the negotiation of, a transaction for a third party, are recognised on completion of the underlying transaction.

Income from bonds or guarantees and letters of credit

Income from bonds or guarantees and letters of credit are recognised on a straight line basis over the life of the bond or guarantee in accordance with the requirement of IFRS 15.

Dividend income

Dividends are recognised in profit or loss when the entity's right to receive payment is established.

2.6 Impairment of non-financial assets

Assets are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. Additionally, intangible assets that have an indefinite useful life and are not subject to amortisation are tested annually for impairment. An impairment loss is recognised for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use. For the purpose of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash inflows (cash-generating units). The impairment test may also be performed on a single asset when the fair value less cost to sell or the value in use can be determined reliably. Non-financial assets other than goodwill that suffered impairment are reviewed for possible reversal of the impairment at each reporting date.

Impairment losses recognised in prior periods are assessed at each reporting date for any indications that the loss has decreased or no longer exists. An impairment loss is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortisation, if no impairment loss had been recognised. An impairment loss in respect of goodwill is not reversed.

Notes to the financial statements for the period ended 30 September 2019

2.7 Statement of cash flows

The Statement of cash flows shows the changes in cash and cash equivalents arising during the period from operating activities, investing activities and financing activities. Cash and cash equivalents include highly liquid investments.

The cash flows from operating activities are determined by using the indirect method. Net income is therefore adjusted by non-cash items, such as measurement gains or losses, changes in provisions, as well as changes from receivables and liabilities. In addition, all income and expenses from cash transactions that are attributable to investing or financing activities are eliminated.

The Bank's assignment of the cash flows to operating, investing and financing category depends on the Bank's business model (management approach). Interest received and interest paid are classified as operating cash flows, while dividends received and dividends paid are included in investing and financing activities respectively.

2.8 Cash and cash equivalents

Cash and cash equivalents comprise balances with less than three months' maturity from the date of acquisition, including cash in hand, deposits held at call with banks and other short-term highly liquid investments with original maturities of three months or less.

For the purposes of the statement of cash flows, cash and cash equivalents include cash and non-restricted balances with central bank.

2.9 Leases

Leases are divided into finance leases and operating leases

(a) The company is the lessee (Policy applicable before 1 January 2019)

(i) Operating lease

Leases in which a significant portion of the risks and rewards of ownership are retained by another party, the lessor, are classified as operating leases. Payments, including prepayments, made under operating leases (net of any incentives received from the lessor) are charged to profit or loss on a straight-line basis over the period of the lease. When an operating lease is terminated before the lease period has expired, any payment required to be made to the lessor by way of penalty is recognised as an expense in the period in which termination takes place.

(ii) Finance lease

Leases of assets where the Bank has substantially all the risks and rewards of ownership are classified as finance leases. Finance leases are capitalised at the lease's commencement at the lower of the fair value of the leased property and the present value of the minimum lease payments. Each lease payment is allocated between the liability and finance charges so as to achieve a constant rate on the finance balance outstanding. The corresponding rental obligations, net of finance charges, are included in 'Deposits from banks' or 'Deposits from customers' depending on the counter party. The interest element of the finance cost is charged to profit or loss over the lease period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period. The investment properties acquired under finance leases are measured subsequently at their fair value.

For policy applicable from 1 January 2019 see note 2.1.2.

(b) The company is the lessor

(i) Operating lease

When assets are subject to an operating lease, the assets continue to be recognised as property and equipment based on the nature of the asset. Lease income is recognised on a straight line basis over the lease term. Lease incentives are recognised as a reduction of rental income on a straight-line basis over the lease term.

(ii) Finance lease

When assets are held subject to a finance lease, the related asset is derecognised and the present value of the lease payments (discounted at the interest rate implicit in the lease) is recognised as a receivable. The difference between the gross receivable and the present value of the receivable is recognised as unearned finance income. Lease income is recognised over the term of the lease using the net investment method (before tax), which reflects a constant periodic rate of return.

2.10 Property, plant and equipment

Land and buildings comprise mainly branches and offices. All property and equipment used by the Bank is stated at historical cost less accumulated depreciation and accumulated impairment losses, if any. Historical cost includes expenditure that is directly attributable to the acquisition of the items

Subsequent expenditures are included in the asset's carrying amount or are recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Bank and the cost of the item can be measured reliably. The carrying amount of the replaced part is derecognised. All other repair and maintenance costs are charged to 'Other operating expenses' during the financial period in which they are incurred.

Land is not depreciated. Depreciation of other assets is calculated using the straight-line method to allocate their cost to their residual values over their estimated useful lives, as follows:

- Building: Depreciated over 50 years
- Leasehold Improvements: the lower of useful life and lease period.
- Motor vehicles: 4 years
- Furniture and fittings: 5 years
- Computer equipment: 5 years
- Office equipment: 5 years

Notes to the financial statements for the period ended 30 September 2019

2.10 Property, plant and equipment *continued*

The assets' residual values, depreciation method and useful lives are reviewed annually, and adjusted if appropriate. Gains and losses on disposals are determined by comparing the proceeds with the carrying amount. These are included in 'Other operating expenses' in profit or loss.

Construction cost and improvements in respect of offices is carried at cost as capital work in progress. On completion of construction or improvements, the related amounts are transferred to the appropriate category of property and equipment. Payments in advance for items of property and equipment are included as Prepayments in "Other Assets" and upon delivery are reclassified as additions in the appropriate category of property and equipment.

2.11 Intangible assets

Costs associated with maintaining computer software programmes are recognised as an expense as incurred. Development costs that are directly attributable to the design and testing of identifiable and unique software products controlled by the Bank, are recognised as intangible assets when the following criteria are met:

- there is an ability to use or sell the software product;
- it is technically feasible to complete the software product so that it will be available for use;
- management intends to complete the software product and use or sell it;
- it can be demonstrated how the software product will generate probable future economic benefits;
- adequate technical, financial and other resources to complete the development and to use or sell the software product are available;
- the expenditure attributable to the software product during its development can be reliably measured.

Subsequent expenditure on computer software is capitalised only when it increases the future economic benefits embodied in the specific asset to which it relates.

Direct computer software costs recognised as intangible assets are amortised on the straight-line basis over 3 years and are carried at cost less any accumulated amortisation and any accumulated impairment losses.

2.12 Income taxation

The tax expense for the period comprises current and deferred tax. Tax is recognised in arriving at profit or loss, except to the extent that it relates to items recognised in other comprehensive income or directly in equity. In this case, the tax is also recognised in other comprehensive income or directly in equity, respectively.

(i) *Current income tax*

The tax expense for the period comprises current and deferred tax. Tax is recognised in arriving at profit or loss, except to the extent that it relates to items recognised in other comprehensive income or directly in equity. In this case, the tax is also recognised in other comprehensive income or directly in equity, respectively.

(ii) *Deferred income tax*

Deferred income tax is recognised, using the liability method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the interim financial statements. Deferred income tax is determined using tax rates (and laws) that have been enacted or substantially enacted by the reporting date and are expected to apply when the related deferred income tax asset is realised or the deferred income tax liability is settled.

Deferred income tax assets are recognised only to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilised. Deferred income tax is provided on temporary differences arising from investments in subsidiaries and associates, except where the timing of the reversal of the temporary difference is controlled by the Bank and it is probable that the difference will not reverse in the foreseeable future.

Deferred income tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and when the deferred income tax assets and liabilities relate to income taxes levied by the same taxation authority on either the same taxable entity or different taxable entities where there is an intention to settle the balance on a net basis.

2.13 Provisions

Provisions for restructuring costs and legal claims are recognised when: the Bank has a present legal or constructive obligation as a result of past events; it is more likely than not that an outflow of resources will be required to settle the obligation; and the amount has been reliably estimated. The Bank recognises no provisions for future operating losses.

If the effect of the time value of money is material, provisions are discounted using a current pre-tax rate that reflects, when appropriate, the risks specific to the liability. When discounting is used, the increase in the provision due to the passage of time is recognised as a finance cost.

Notes to the financial statements for the period ended 30 September 2019

2.14 Share capital

(i) Share issue costs

Incremental costs directly attributable to the issue of new shares or options or to the acquisition of a business are shown in equity as a deduction, net of tax, from the proceeds.

Dividends on ordinary shares

Dividends on ordinary shares are recognised in equity in the period in which they are approved by the Bank's shareholders. Dividends for the period that are declared after the reporting date are dealt with in the subsequent events note.

Dividends proposed by the Directors but not yet approved by members are disclosed in the interim financial statements in accordance with the requirements of the Company and Allied Matters Act.

2.15 Fair value measurement

The Bank measures some financial instruments at fair value at each reporting date. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. The fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:

- * In the principal market for the asset or liability
- * In the absence of a principal market, in the most advantageous market for the asset or liability

The principal or the most advantageous market must be accessible by the Bank.

The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability, assuming that market participants act in their economic best interest.

A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The Bank uses valuation techniques that are appropriate in the circumstances and for which sufficient data are available to measure fair value, maximising the use of relevant observable inputs and minimising the use of unobservable inputs.

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorised within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

- Level 1 — Quoted (unadjusted) market prices in active markets for identical assets or liabilities
- Level 2 — Valuation techniques for which the lowest level input that is significant to the fair value measurement is directly or indirectly observable
- Level 3 — Valuation techniques for which the lowest level input that is significant to the fair value measurement is unobservable

For assets and liabilities that are recognised in the financial statements at fair value on a recurring basis, the Bank determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation (based on the lowest level input that is significant to the fair value measurement as a whole) at the end of each reporting period.

2.16 Comparatives

Except when a standard or an interpretation permits or requires otherwise, all amounts are reported or disclosed with comparative information. Where IAS 8 applies, comparative figures have been adjusted to conform with changes in presentation in the current period.

Segment Reporting

IFRS 8 requires an entity to report financial and descriptive information about its reportable segments, which are operating segments or aggregations of operating segments that meet specified criteria. Operating segments are components of an entity about which separate financial information is available that is evaluated regularly by the chief operating decision-maker in deciding how to allocate resources and in assessing performance. The bank has determined the (Executive Committee) as its chief operating decision maker.

IFRS 8.20 states that an entity shall disclose information to enable users of its financial statements to evaluate the nature and financial effects of the types of business activities in which it engages and the economic environments in which it operates. Following the management approach to IFRS 8, operating segments are reported in accordance with the internal reports provided to the Bank's Managing Director (the chief operating decision maker). The following summary describes each of the bank's reportable segments.

Retail banking

The retail banking segment offers a comprehensive range of retail, personal and commercial services to individuals, small and medium business customers including a variety of E-Business products to serve the retail banking segment.

Corporate banking

The corporate banking segment offers a comprehensive range of commercial and corporate banking services to the corporate business customers including other medium and large business customers. The segment covers Power and infrastructure, Oil and Gas Upstream and Downstream, Real Estate, Agro-Allied and other industries.

Investment banking

The bank's investment banking segment is involved in the funding and management of the bank's securities, trading and investment decisions on asset management with a view of maximising the bank's shareholders returns.

**Notes to the financial statements
for the period ended 30 September 2019**

3 Financial risk management and fair value measurement and disclosure

3.1 Introduction and overview

Set out below is the information about the nature and extent of risks arising from the financial instruments to which the bank is exposed at the end of the reporting period.

Enterprise Risk Management

Fidelity Bank runs an Enterprise-wide Risk Management system which is governed by the following key principles:

- i) Comprehensive and well defined policies and procedures designed to identify, assess, measure, monitor and report significant risk exposures of the entity. These policies are clearly communicated throughout the Bank and are reviewed annually.
- ii) Clearly defined governance structure.
- iii) Clear segregation of duties within the Risk Management Division and also between them and the business
- iv) Management of all classes of banking risk broadly categorized into credit, market, liquidity, operational risk independently but in a co-ordinated manner at all relevant levels within the Bank.

Risk Management Governance Structure

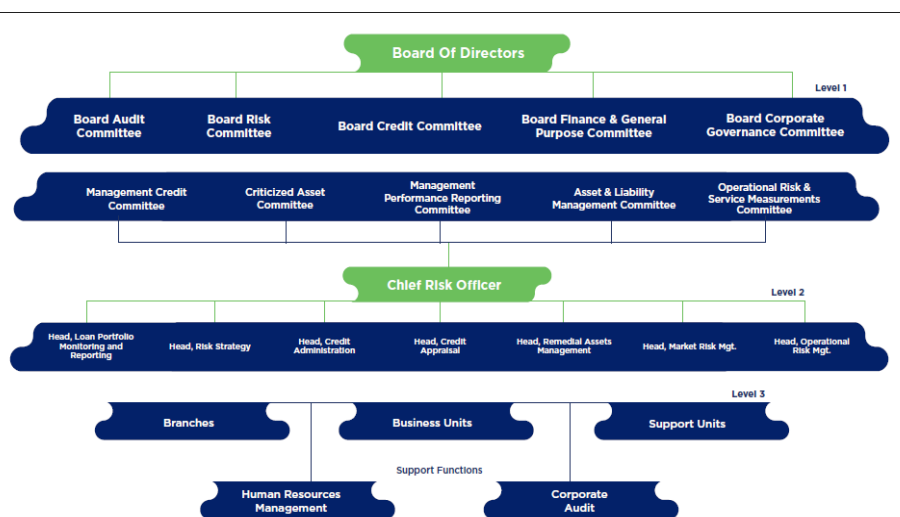
Enterprise-wide risk management roles and responsibilities are assigned to stakeholders in the Bank at three levels as follows:

Level 1 - Board/Executive Management oversight is performed by the Board of Directors, Board Audit Committee, Board Risk Committee, Board Credit Committee, Board Finance & General Purpose Committee and Executive Management Committee (EXCO).

Level 2 - Senior Management function is performed by the Management Credit Committee (MCC), Criticised Assets Committee (CAC), Asset and Liability Management Committee (ALCO), Operational Risk & Service Measurements Committee (ORSMC), Management Performance Reporting Committee (MPR), The Chief Risk Officer (CRO) and Heads of Enterprise Risk Strategy, Loan Processing, Credit Administration, Remedial Assets Management, Market Risk Management & ALM and IT & Operational Risk Management.

Level 3 - This is performed by all enterprise-wide Business and Support Units. Business and Support Units are required to comply with all risk policies and procedures and to manage risk exposures that arise from daily operations.

The Bank's Corporate Audit Division assists the Board Risk Committee by providing independent appraisal of the Bank's risk framework for internal risk assurance. The Division assesses compliance with established controls and enterprise-wide risk management methodologies. Significant risk related infractions and recommendations for improvement in processes are escalated to relevant Management and Board committees.



Enterprise Risk Philosophy

Fidelity Enterprise Risk Mission

Risk Culture

The Bank's risk culture proactively anticipates and curtails losses that may arise from its banking risk underwriting. This culture evolved out of the understanding that the Bank is in a growth phase which requires strong risk management. By design therefore, the Bank operates a managed risk culture, which places emphasis on a mixture of growth and risk control to achieve corporate goals without compromising asset or service quality.

Risk Appetite

The risk appetite describes the quantum of risk that we would assume in pursuit of the Bank's business objectives at any point in time. For the Bank, it is the core instrument used in aligning the Bank's overall corporate strategy, the Bank's capital allocation and risks.

**Notes to the financial statements
for the period ended 30 September 2019**

3.1 Introduction and overview *continued*

The Bank define the Bank's Risk Appetite quantitatively at two levels: Enterprise level and Business/Support Unit level. To give effect to the above, the Board of Directors of the Bank sets target Key Performance Indicators (KPIs) at both enterprise and business/support unit levels

At the Business and Support unit level, the enterprise KPIs are cascaded to the extent that the contribution of each Business/Support Unit to risk losses serves as input for assessing the performance of the Business/Support Unit.

3.2 Credit risk

3.2.1 Management of credit risk

Credit risk is the risk that the Bank will incur a loss because its customers or counterparties fail to discharge their contractual obligations. The Bank manages and controls credit risk by setting limits on the amount of risk it is willing to accept for individual counterparties and for geographical and industry concentrations, and by monitoring exposures in relation to such limits.

Credit risk is the single largest risk for the Bank's business; management therefore carefully manages its exposure to credit risk. The Bank measures and manage credit risk following the principles below:

- Consistent standards as documented in the Bank's credit policies and procedures manual are applied to all credit applications and credit approval decisions.
- Credit facilities are approved for counter-parties only if underlying requests meet the Bank's standard risk acceptance criteria.
- Every extension of credit or material change to a credit facility (such as its tenor, collateral structure or major covenants) to any counterparty requires approval at the appropriate authority level. The approval limits are as follows:

Approval Authority	Approval limits
Executive Directors	N50 million and below
Managing Director/CEO	Above N50 million but below N100 million
Management Credit and Investment Committee	Above N100 million but below N500 millio
Board Credit Committee	Above N500 million but below N1 billion
Full Board	N1 billion and above

- The Bank assigns credit approval authorities to individuals according to their qualifications, experience, training and quality of previous credit decisions. These are also reviewed by the Bank periodically.
- The Bank measures and consolidates all the Bank's credit exposures to each obligor on a global basis. The Bank's definition of an "obligor" include a group of individual borrowers that are linked to one another by any of a number of criteria the Bank have established, including capital ownership, voting rights, demonstrable control, other indication of group affiliation; or are jointly and severally liable for all or significant portions of the credit the Bank have extended.
- The Bank's respective business units are required to implement credit policies and procedures while processing credit approvals including those granted by Management and Board Committees.
- Each business unit is responsible for the quality, performance and collection of its credit portfolio including those approved by the Management and Board Committees.
- The Bank's Credit Control and Loan Portfolio Monitoring & Reporting departments regularly undertake independent audit and credit quality reviews of credit portfolios held by business units.

**Notes to the financial statements
for the period ended 30 September 2019**

3.2.2 Credit risk ratings

A primary element of the Bank's credit approval process is a detailed risk assessment of every credit associated with a counter-party. The Bank's risk assessment procedures consider both the credit worthiness of the counter-party and the risks related to the specific type of credit facility or exposure. This risk assessment not only affects the structuring of the transaction and the outcome of the credit decision, but also influences the level of decision-making authority required to extend or materially change the credit and the monitoring procedures we apply to the on-going exposure.

The Bank has its own in-house assessment methodologies and rating scale for evaluating the creditworthiness of its counter-parties. The Bank's programmed 9-grade rating model was developed in collaboration with Agosto & Company, a foremost rating agency in Nigeria, to enable comparison between the Bank's internal ratings and the common market practice, which ensures comparability between different portfolios of the Bank.

Bank rating	Applicable score band	Agusto & CO	Description of the grade
AAA	90% - 100%	AAA	Investment grade Exceptionally strong business fundamentals and overwhelming capacity to meet obligations in a timely manner.
AA	80% - 89%	AA	Standard Monitoring Very good business fundamentals and very strong capacity to meet obligations
A	70% - 79%	A	Good business fundamentals and strong capacity to meet obligations
BBB	60% - 69%	BBB	Satisfactory business fundamentals and adequate capacity to meet obligations
BB	50% - 59%	BB	Satisfactory business fundamentals but ability to repay may be contingent upon
B	40% - 49%	B	Weak business fundamentals and capacity to repay is contingent upon refinancing.
CCC	30% - 39%	CCC	Very weak business fundamentals and capacity to repay is contingent upon
CC	20% - 29%	CC	Very weak business fundamentals and capacity to repay in a timely manner may be
C	0% - 19%	C	Default Imminent Solvency

We generally rate all the Bank's credit exposures individually. The rating scale and its mapping to the Standard and Poors agency rating scale is as follows:

Internal Rating Categories	Interpretation	Mapping to External
AAA	Impeccable financial condition and overwhelming capacity to meet obligations in a timely manner	AAA
AA	Very good financial condition and very low likelihood of default	AA
A	Good financial condition and low likelihood of default	A
BBB to BB	Satisfactory financial condition and adequate capacity to meet obligations	BBB to BB
B to CCC	Weak financial condition and capacity to repay is in doubt and may be contingent upon refinancing	B to D

3.2.3 Credit Limits

Portfolio concentration limits are set by the Bank to specify maximum credit exposures we are willing to assume over given periods. The limits reflect the Bank's credit risk appetite. The parameters on which portfolio limits are based include limits per obligor, products, sector, industry, rating grade, geographical location, type of collateral, facility structure and conditions of the exposure.

Monitoring Default Risk

The Bank's credit exposures are monitored on a continuing basis using the risk management tools described above. The Bank has also put procedures in place to identify at an early stage credit exposures for which there may be an increased risk of loss. Counter-parties that on the basis of the application of the Bank's risk management tools, demonstrate the likelihood of problems, are identified well in advance so that the Bank can effectively manage the credit exposure and maximize the recovery. The objective of this early warning system is to address potential problems while adequate alternatives for action are still available. This early risk detection is a tenet of the Bank's credit culture and is intended to ensure that greater attention is paid to such exposures. In instances where the Bank has identified counterparties where problems might arise, the respective exposure is placed on a watch-list.

**Notes to the financial statements
for the period ended 30 September 2019**

3.2.4 Expected credit loss measurement

The table below summarises the impairment requirements under IFRS 9 (other than purchased or originated credit-impaired financial assets):

Change in credit quality since initial recognition		
Stage 1	Stage 2	Stage 3
Initial recognition	Significant increase in credit risk since initial recognition	Credit-impaired assets
12 month expected credit losses	Lifetime Expected credit losses	Lifetime Expected credit losses

(a) Significant increase in credit risk

At initial recognition, the Bank allocates each exposure to a credit risk grade based on available information about the borrower that is determined to be predictive of the risk of default and applying experienced credit judgement. Credit risk grades are defined and calibrated such that the risk of default occurring increases as the credit risk deteriorates.

The Bank monitors its loans and debt portfolios to determine when there is a significant increase in credit risk in order to transition from stage 1 to stage 2. In assessing significant increase in credit risk, management considers only 'backstop' (30 days past due presumption) indicators. Financial assets that have been granted forbearance could be considered to have significantly increased in credit risk.

Backstop indicators

A backstop is applied and the financial instrument considered to have experienced a significant increase in credit risk if the borrower is more than 30 days past due on its contractual payments.

For assessing increase in credit risk, the Bank sets the origination date of revolving and non-revolving facilities as the last reprice date i.e. the last time the lending was re-priced at a market rate.

(b) Definition of default

The Bank considers a financial asset to be in default which is fully aligned with the credit-impaired, when it meet the following criteria:

Quantitative criteria

- Internal credit rating - Downgrade from Performing to Non-performing
- Internal credit rating - Downgrade from Performing to Non-performing

(c) Measuring ECL – Explanation of inputs, assumptions and estimation techniques

The Expected Credit Loss (ECL) is measured on either a 12-month (12M) or lifetime basis depending on whether a significant increase in credit risk has occurred since initial recognition or whether an asset is considered to be credit-impaired. Expected credit losses are the discounted product of the Probability of Default (PD), Exposure at Default (EAD), and Loss Given Default (LGD), defined as follows:

- The PD represents the likelihood of a borrower defaulting on its financial obligation (as per "Definition of default and credit impaired" above), either over the next 12 months (12M PD), or over the remaining lifetime (Lifetime PD) of the obligation.
- EAD is based on the amounts the Bank expects to be owed at the time of default, over the next 12 months (12M EAD) or over the remaining lifetime (Lifetime EAD). For a revolving commitment, the Bank includes the current drawn balance plus any further amount that is expected to be drawn up to the current contractual limit by the time of default, should it occur.
- Loss Given Default (LGD) represents the Bank's expectation of the extent of loss on a defaulted exposure. LGD varies by type of counterparty, type and seniority of claim and availability of collateral or other credit support. LGD is expressed as a percentage loss per unit of exposure at the time of default (EAD). LGD is calculated on a 12-month or lifetime basis, where 12-month LGD is the percentage of loss expected to be made if the default occurs in the next 12 months and Lifetime LGD is the percentage of loss expected to be made if the default occurs over the remaining expected lifetime of the loan.

The ECL is determined by projecting the PD, LGD and EAD for each future month and for each individual exposure or collective segment. These three components are multiplied together and adjusted for the likelihood of survival (i.e. the exposure has not prepaid or defaulted in an earlier month). This effectively calculates an ECL for each future month, which is then discounted back to the reporting date and summed. The discount rate used in the ECL calculation is the original effective interest rate or an approximation thereof.

The Lifetime PD is derived by using historical data to develop specific lifetime PD models for all asset classes. The long term span of historical data is then used to directly model the PD across the life of an exposure. For debt instruments that are not internally rated, the Bank obtains the issuer ratings of such instruments and matches them to its internal rating framework to determine the equivalent rating. The lifetime PD curves developed for that rating band will then be used.

The 12-month and lifetime EADs are determined based on the expected payment profile, which varies by product type. The assumptions underlying the ECL calculation – such as how the maturity profile of the PDs and how collateral values change etc. – are monitored and reviewed on a regular basis. There have been no significant changes in estimation techniques or significant assumptions made during the reporting period.

**Notes to the financial statements
for the period ended 30 September 2019**

3.2.4 Expected credit loss measurement *continued*

(d) Forward-looking information incorporated in ECL models

The assessment of SICR and the calculation of ECL both incorporate forward-looking information. The Bank has performed historical analysis and identified the key economic variables impacting credit risk and expected credit losses for each portfolio.

These economic variables and their associated impact on the PD, EAD and LGD vary by financial instrument. Expert judgment has also been applied in this process. Forecasts of these economic variables (the “base economic scenario”) are provided by the Bank’s strategy team on a quarterly basis. The specific macro-economic model applied is a Markov multi-state model of transitions in continuous time with macroeconomic co-variables. The impact of these economic variables on the PD, EAD and LGD has been determined by performing statistical regression analysis to understand the impact these variables have had historically on default rates and on the components of LGD and EAD.

In addition to the base economic scenario, the Bank’s strategy team also provides other possible scenarios along with scenario weightings. The number of other scenarios used is based on the analysis of each major product type to ensure non-linearities are captured. The number of scenarios and their attributes are reassessed at each reporting date. At 1 January 2018 and 31 December 2018, the Bank concluded that three scenarios appropriately captured non-linearities for all its portfolios.

As with any economic forecasts, the projections and likelihoods of occurrence are subject to a high degree of inherent uncertainty and therefore the actual outcomes may be significantly different to those projected. The Bank considers these forecasts to represent its best estimate of the possible outcomes and has analysed the non-linearities and asymmetries within the Bank’s different portfolios to establish that the chosen scenarios are appropriately representative of the range of possible scenarios.

Economic variable assumption

The most significant period-end assumptions used for the ECL estimate as at 30 September 2019 are set out below. The scenarios “base”, “upside” and “downside” were used for all portfolios.

	2019	2020	2021	2022
9M to 31 December				
Inflation rate				
Base Case	11.50%	11.30%	10.80%	8.50%
Best Case	9.50%	9.30%	8.80%	4.10%
Worse Case	13.50%	13.30%	12.80%	10.50%
Crude Oil (\$)				
Base Case	60.00	55.00	50.00	50.00
Best Case	75.00	70.00	65.00	60.00
Worse Case	45.00	40.00	35.00	30.00
Foreign Reserves (\$ Bn)				
Base Case	38.33	35.14	31.94	30.44
Best Case	46.43	43.33	40.24	39.44
Worse Case	0.00	0.00	0.00	0.00
Unemployment rate				
Base Case	23.53%	23.93%	24.33%	24.73%
Best Case	22.03%	22.43%	22.83%	23.23%
Worse Case	25.03%	25.43%	25.83%	26.23%
Real Gross Domestic Product				
Base Case	2.50%	2.90%	3.40%	3.60%
Best Case	3.00%	3.40%	3.90%	4.10%
Worse Case	1.00%	1.40%	1.90%	2.10%
Monetary Policy Rate (MPR)				
Base Case	14.00%	13.00%	13.50%	13.50%
Best Case	12.00%	11.00%	11.50%	11.50%
Worse Case	15.00%	15.00%	15.50%	15.50%

(e) Grouping financial instruments for collective assessment

For expected credit loss provisions modelled on a collective basis, a grouping of exposures is performed on the basis of shared risk characteristics, such that risk exposures within a group are homogeneous.

In performing this grouping, there must be sufficient information for the group to be statistically credible. Where sufficient information is not available internally, the Bank has considered benchmarking internal/external supplementary data to use for modelling purposes. The characteristics used to determine groupings include instrument type, credit risk ratings and industry.

The aggregation of financial instruments may change over time as new information becomes available.

3.2.5 Credit quality

Maximum exposure to credit risk – Financial instruments subject to impairment

The credit risk model is applied as per homogeneous group of risk assets which can be a portfolio or a rating model (e. g. Master Rating). The bank set up 6 portfolios three of which are a mix of Corporate and Commercial Accounts segregated on the basis of related economic sectors. The other three portfolios are made up of retails accounts segregated on the basis of similarity of risk characteristics. Details of the portfolios are shown below:

Code	Description
Portfolio 1	Agriculture, Energy, Manufacturing, Construction & Real Estate
Portfolio 2	Government, Public Sector & NBFIs
Portfolio 3	Transport, Communication, Commerce & General
Portfolio 4	Automobile, Equipment & Mortgage Loans
Portfolio 5	Medium and Small Scale Enterprises
Portfolio 6	Personal & Employee Loans

The following table contains an analysis of the credit risk exposure of financial instruments for which an ECL allowance is recognised. The gross carrying amount of financial assets below also represents the Bank's maximum exposure to credit risk on these assets.

3.2.6 Description of collateral held

Potential credit losses from any given exposure are mitigated using a range of tools including collateral securities, insurance bonds and policies as well as different forms of guarantees. The Bank assesses the degree of reliance that can be placed on these credit risk mitigants carefully in the light of issues such as legal enforceability, market valuation, correlation with exposure and the counterparty risk of the guarantor.

(a) Key Collateral Management Policies

The Bank's risk mitigation policies determine the eligibility of collateral types. Eligible collateral types for credit risk mitigation include: cash; residential, commercial and industrial property in acceptable locations; fixed assets such as motor vehicles, plant and machinery; marketable securities; bank guarantees; confirmed domiciliation of payments; credit and insurance bonds, warehouse warrants, lien on shipping documents; back-to-back letters of credit; etc. The Bank also enters into collateralised reverse repurchase agreements where appropriate. For certain types of lending, typically mortgages and asset financing, the right to take charge over physical assets is a significant consideration in determining appropriate pricing and recoverability in the event of default.

The Bank reports collateral values in accordance with the Bank's risk mitigation policy, which prescribes the frequency of valuation for different collateral types, based on the level of price volatility of each type of collateral and the nature of the underlying product or risk exposure. Depending on the nature of the collateral, frequent or periodic evaluations are carried out to determine the adequacy of collateral margins. Services of independent professional appraisers are used where the Bank lacks adequate internal valuation capability or where dictated by industry practice or legal requirements. Where appropriate, collateral values are adjusted to reflect current market conditions, the probability of recovery and the period of time to realise the collateral in the event of repossession.

The Bank will only grant unsecured loans where clean lending is a market feature and insistence on security would compromise Bank's market share. In such an instance, the Bank ensures that the borrower has proven record of sound financial condition and ability to repay the loan from internal sources in the ordinary course of business. In addition, we ensure that total outstanding borrowings of the obligor do not exceed 70% of estimated asset value.

The Bank believes that the requirement for collateral is not a substitute for the ability to pay, which is a primary consideration in the Bank's lending decisions. Although the Bank will usually collateralise its credit exposure to a customer, such an obligor is expected to repay the loan in the ordinary course of business without forcing the Bank to look to the collateral for ultimate repayment. Therefore, if while reviewing a loan request, there is the possibility that the collateral will need to be relied upon to repay the loan, the Bank will not grant the facility.

Where guarantees are used for credit risk mitigation, the creditworthiness of the guarantor is assessed and established using the credit approval process in addition to that of the obligor or main counterparty. Management of secured credits requires periodic inspections of the collateral to ensure its existence and adequacy for the bank's exposure. These inspections include examination of security agreements to determine enforceability of liens, verification of adequate insurance protection, proper legal registration and adequacy of overall safeguards.

When obligations are secured by marketable securities, predetermined maintenance margins are established and the securities are liquidated if the value falls to this limit except if additional and satisfactory security is provided. In all cases, only valuations done at the instance of the Bank can be considered acceptable for the purposes of credit risk mitigation. The Bank ensures that all properties and chattels pledged as collateral are properly and adequately insured with the Bank's interest duly noted as first loss beneficiary. Only insurance policies obtained from an insurance firm in the Bank's pre-approved list of Insurance Companies are acceptable as eligible collateral. The Bank's policies regarding obtaining collateral have not significantly changed during the reporting period and there has been no significant change in the overall quality of the collateral held by the Bank since the prior period.

3.3 Liquidity risk

Liquidity risk is the risk that the Bank is unable to meet its payment obligations associated with its financial liabilities when they fall due and to replace funds when they are withdrawn. The consequence may be the failure to meet obligations to repay depositors and fulfil commitments to lenders.

3.3.1 Management of liquidity risk

The Bank's principal liquidity objective is to ensure that the Bank holds sufficient liquid reserve to enable it meet all probable cashflow obligations, without incurring undue transaction costs under normal conditions. Liquidity management safeguards the ability of the bank to meet all payment obligations as they fall due. The Bank's liquidity risk management framework has been an important factor in maintaining adequate liquidity and a healthy funding profile during the period and is structured to identify, measure and manage The Bank's liquidity risk at all times. The Board approved liquidity policy guides the management of liquidity risk strategically through the Board Risk Committee (BRC) as well as Asset and Liability Committee (ALCO) and daily by the ALM group. The liquidity management framework is designed to identify measure and manage The Bank's liquidity risk position at all times. Underlying Assets and Liabilities Management policies and procedures are reviewed and approved regularly by the Assets and Liability Management Committee (ALCO).

The Bank has established liquidity and concentration limits and ratios, tolerance levels as well as triggers, through which it identifies liquidity risk. It also uses gap analysis to identify short, medium and long term mismatches, deploying gapping strategies to appropriately manage them. Periodic monitoring is carried out to trigger immediate reaction to deviations from set limits.

The Bank's reporting system tracks cash flows on a daily basis. This system allows management to assess The Bank's short-term liquidity position in each location by currency and products. The system captures all of The Bank's cash flows from transactions on the Bank's Statement of financial position, as well as liquidity risks resulting from off-balance sheet transactions. We take account of products that have no specific contractual maturities by extrapolating from their historical behaviour of cash flows.

Asset Liquidity

The asset liquidity component tracks the volume and booking location of the Bank's inventory of unencumbered liquid assets, which we can use to raise liquidity in times of need. The liquidity of these assets is an important element in protecting us against short-term liquidity squeezes. We keep a portfolio of highly liquid securities in major currencies around the world to supply collateral for cash needs associated

Short-Term Liquidity

Funding Diversification

Diversification of the Bank's funding profile in terms of investor types, regions, products and instruments is also an important element of the Bank's liquidity risk management practices. In addition, the bank invests in liquid assets to facilitate quick conversion to cash, should the need arise.

Stress Testing

As a result of volatilities which take place in the Bank's operating environment, the Bank conducts stress tests to evaluate the size of potential losses related to rate movements under extreme market conditions. These are conducted on elements of its trading portfolio in response to the economic and market outlook. Consideration is given to historical events, prospective events and regulatory guidelines. The Bank, after ALCO's authorization, responds to the result of this activity, by modifying the portfolio and taking other specific steps to reduce the expected impact in the event that these risks materialize.

**Notes to the financial statements
for the period ended 30 September 2019**

3.4 Market Risk

The Bank takes on exposure to market risks, which is the risk that the fair value or future cash flows of a financial instrument will be adversely affected by changes in market prices such as interest rates, foreign exchange rates, equity prices and commodity prices.

3.4.1 Management of market risk

Essentially, the banking business in which the Bank is engaged is subject to the risk that financial market prices and rates will move and result in profits or losses for us. Market risk arises from the probability of adverse movements in financial market prices and rates. The Bank's definition of financial market prices in this regard refer to interest rates, equity prices, foreign exchange rates, commodity prices, the correlations among them and their levels of volatility. Interest rate and equity price risks consist of two components each: general risk, which describes value changes due to general market movements, and specific risk which has issuer-related causes.

The Bank assumes market risk in both the Bank's trading and non-trading activities. The Bank underwrite market risks by making markets and taking proprietary positions in the inter-bank, bonds, foreign exchange and other security markets. The Bank separates its market risk exposures between the trading and the banking books. Overall authority and management of market risk in the Bank is invested on the Assets and Liability Management Committee (ALCO).

The Board approves the Bank's Market Risk Management policy and performs its oversight management role through the Board Risk Committee (BRC). The Bank's trading strategy evolves from its business strategy, and is in line with its risk appetite. The Bank's Market Risk and ALM group manages the Bank's market risk in line with established risk limits, which are measured, monitored and reported on, periodically. Established risk limits, which are monitored on a daily basis by the Bank's Market Risk group, include intraday, daily devaluation for currency positions, net open position, dealers', deposit placement, stop loss, duration and management action trigger limits. Daily positions of the Bank's trading books are marked-to-market to enable the Bank obtain an accurate view of its trading portfolio exposures. Financial market prices used in the mark-to-market exercise are independently verified by the Market Risk Group with regular reports prepared at different levels to reflect volatility of the Bank's earnings

3.4.1.2 Foreign exchange risk

The Bank takes on exposure to the effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows. The Board sets limits on the level of exposure by currency and its aggregate for both overnight and intra-day positions, which are monitored daily.

Notes to the financial statements for the period ended 30 September 2019

3.5 Fair value of financial assets and liabilities *continued*

(a) Fair valuation methods and assumptions

(i) Cash and balances with central banks

Cash and balances with central bank represent cash held with central banks of the various jurisdictions in which the Bank operates. The fair value of these balances approximates their carrying amounts.

(ii) Due from other banks

Due from other banks represents balances with local and correspondence banks, inter-bank placements and items in the course of collection. The fair value of the current account balances, floating placements and overnight deposits approximates their carrying amounts.

(iii) Treasury bills and bonds

Treasury bills represent short term instruments issued by the Central banks of the jurisdiction where the Bank operates. The fair value of treasury bills are derived from the quoted yields, while the fair value of bonds are determined with reference to quoted prices in active markets for identical assets. For certain securities market prices cannot be readily obtained especially for illiquid Federal Government Bonds, State Government and Corporate Bonds. The positions was marked-to-model at June 30 2019 and 31 December 2018 based on yields for identical assets. Fair value is determined using discounted cash flow model.

(iv) Equity securities

The fair value of quoted equity securities are determined by reference to quoted prices (unadjusted) in active markets for identical instruments. The fair value of unquoted equity securities are determined based on the level of information available. The investment in unquoted entities is carried at fair value. They are measured at fair value using price multiples.

The fair value of equity security (for investment in quoted company) categorised as Level 1 was determined by applying the closing price of relevant equity security as at the reporting date.

(v) Loans and advances to customers

Loans and advances are carried at amortised cost net of allowance for impairment. The estimated fair value of loans and advances represents the discounted amount of estimated future cash flows expected to be received. Expected cash flows are discounted at current market rates to determine fair value.

(vi) Overdraft

The management assessed that the fair value of Overdrafts approximate their carrying amounts largely due to the short-term maturities of these instruments.

(vii) Other assets

Other assets represent monetary assets which usually has a short recycle period and as such the fair values of these balances approximate their carrying amount.

(viii) Deposits from banks and due to customers

The estimated fair value of deposits with no stated maturity, which includes non-interest bearing deposits, is the amount repayable on demand. The estimated fair values of fixed interest-bearing deposits and borrowings are determined using a discounted cash flow model based on a current yield curve appropriate for the remaining term to maturity.

(ix) Other liabilities

Other liabilities represent monetary assets which usually has a short recycle period and as such the fair values of these balances approximate their carrying amount.

(x) Debt issued and other borrowed funds

The fair of the Bank's Eurobond issued is derived from quoted market prices in active markets. The fair values of the Bank's interest-bearing borrowings and loans are determined by using the DCF method using discount rate that reflects the issuer's borrowing rate as at the end of the reporting period. The fair value is determined by using discounted cashflow method.

3.6 Operational Risk Management

Operational risk is the potential for loss arising from inadequate or failed internal processes, people and systems or from external events. This definition includes legal and regulatory risk, but excludes strategic and reputational risk.

The scope of operational risk management in the Bank covers risk exposures that may lead to unavailability of service, information deficiency, financial loss, increased costs, loss of professional reputation, failure to keep or increase market share, risks which result in the imposition of sanctions on the Bank by regulators or legal proceedings against the Bank by third parties.

Organizational Set-up

Operational Risk Management is an independent risk management function within Fidelity Bank. The Operational Risk & Service Measurements Committee is the main decision-making committee for all operational risk management matters and approves the Bank's standards for identification, measurement, assessment, reporting and monitoring of operational risk. Operational Risk Management is responsible for defining the operational risk framework and related policies while the responsibility for implementing the framework day to day operational risk management lies with the Bank's business and support units. Based on this business partnership model the Bank ensures close monitoring and high awareness of operational risk.

Notes to the financial statements for the period ended 30 September 2019

3.6 Operational Risk Management *continued*

Operational Risk Framework

As is common with all businesses, operational risk is inherent in all operations and activities of the Bank. We therefore carefully manage operational risk based on a consistent framework that enables us to determine the Bank's operational risk profile in comparison to the Bank's risk appetite and to define risk mitigating measures and priorities. We apply a number of techniques to efficiently manage operational risk in the Bank's business, for example: as part of the Bank's strategy for making enterprise risk management the Bank's discriminating competence, the Bank has redefined business requirements across all networks and branches using the following tools:

Loss Data Collection

The Bank implements an event driven Loss Data Collection (LDC) system designed to facilitate collection of internal loss data triggered at the occurrence of a loss event anywhere within the divisions of the Bank. The LDC system captures data elements, which discriminate between boundary events related to credit, market and operational risk. The system facilitates collection of loss data arising from actual losses, potential losses and near misses. Work-flow capabilities built within the Bank's predefined Event Escalation Matrix enable risk incidents to be reported to designated Event Identifiers, Event Managers, Event Approvers and Action Owners that manage each risk incident from point of occurrence to closure.

Risk and Control Self Assessments (RCSA)

The Bank implement a quantitative methodology for the Bank's Risk and Control Self Assessments, which supports collection of quantitative frequency and severity estimates. Facilitated top-down RCSA workshops are used by the bank to identify key risks and related controls at business unit levels. During these workshops business experts and senior management identify and discuss key risks, controls and required remedial actions for each respective business unit and the results captured within the operational risk database for action tracking.

Key Risk Indicators (KRIs)

The Bank has measures quantifiable risk statistics or metrics that provide warning signals of risk hotspots in the Bank's entity. The Bank has established key risk indicators with tolerance limits for core operational groups of the Bank. The Bank's KPI database integrates with the Loss Data Collection and Risk & Control Self Assessment models and systems to provide red flags that typically inform initiatives for risk response actions in the Bank.

Business Continuity Management (BCM)

The Bank recognises that adverse incidences such as technology failure, natural and man-made disasters could occur and may affect the Bank's critical resources leading to significant business disruption. To manage this risk, our BCM plans assist in building resilience for effective response to catastrophic events. In broad categories, the plans which are tested periodically, cover disaster recovery, business resumption, contingency planning and crisis management.

4 Capital management

The Bank's objectives when managing capital, which is a broader concept than the 'equity' on the face of statement of financial position, are:

- a. To comply with the capital requirements set by the regulators of the banking markets where the entities within the Bank operate;
- b. To safeguard the Bank's ability to continue as a going concern so that it can continue to provide returns for shareholders and benefits for other stakeholders; and
- c. To maintain a strong capital base to support the development of its business.

Capital adequacy and the use of regulatory capital are monitored daily by the Bank's management, employing techniques based on the guidelines developed by the Central Bank of Nigeria (CBN), for supervisory purposes. The required information is filed with the CBN on a

The CBN requires each bank to: (a) hold the minimum level of the regulatory capital of N25 billion and (b) maintain a ratio of total regulatory capital to the risk-weighted asset at or above the minimum of 15% for an international licensed Bank

In 2016, the Central Bank of Nigeria issued circular BSD/DIR/CIR/GEN/LAB/06/03 to all Bank's and discount houses on the implementation of Basel II/III issued 10 December 2013 and guidance notes to the regulatory capital measurement and management for the Nigerian Banking System for the implementation of Basel II/III in Nigeria. The capital adequacy ratio for the period ended 30 June 2019 and the comparative period 31 December 2018 is in line with the new circular. The computations are consistent with the requirements of Pillar I of Basel II Accord (Internal Convergence of capital measurement and Capital Standards). Although the guidelines comply with the requirement of the Basel II accord certain sections were adjusted to reflect the peculiarities of the Nigerian environment.

The Bank's regulatory capital as managed by its Financial Control and Treasury Units is made up of Tier 1 and Tier 2 capital as follows:

Tier 1 capital: This includes only permanent shareholders' equity (issued and fully paid ordinary shares/common stock and perpetual noncumulative preference shares) and disclosed reserves (created or increased by appropriations of retained earnings or other surpluses). There is no limit on the inclusion of Tier 1 capital for the purpose of calculating regulatory capital.

Tier 2 capital: This includes revaluation reserves, general provisions/general loan loss reserves, Hybrid (debt/equity), capital instruments and subordinated debt. Tier 2 capital is limited to a maximum of 33.3% of the total of Tier 1 capital.

The CBN excluded the following reserves in the computation of total qualifying capital:

- 1 The Regulatory Risk Reserve created pursuant to Section 12.4 (a) of the Prudential Guidelines which was effective on 1 July 2010 is excluded from regulatory capital for the purposes of capital adequacy assessment;
- 2 Collective impairment on loans and receivables and other financial assets no longer forms part of Tier 2 capital; and
- 3 Other Comprehensive Income (OCI) Reserves is recognized as part of Tier 2 capital subject to the limits on the Calculation of Regulatory Capital.

6 Interest and similar income

Loans and advances to customers (see note 6.1)
Treasury bills and other investment securities:
-Fair value through other comprehensive income
-Amortised cost
Advances under finance lease
Placements and short term funds

Q3 2019	Q3 2018	YTD SEPT 2019	YTD SEPT 2018
N'million	N'million	N'million	N'million
35,628	32,463	95,940	84,199
-	-	-	-
5,445	2,693	17,176	14,719
4,365	3,373	10,979	12,632
848	1,389	2,621	4,130
1,982	1,178	5,842	2,085
48,268	41,095	132,558	117,764

7 Interest and similar expense

Term deposits
Debts issued and other borrowed funds
Savings deposits
Current accounts
Inter-bank takings

Q3 2019	Q3 2018	YTD SEPT 2019	YTD SEPT 2018
N'million	N'million	N'million	N'million
16,603	12,326	46,420	38,605
8,069	5,505	21,328	16,782
2,175	1,533	5,920	4,564
1,083	878	3,193	2,279
8	(0)	8	1
27,939	20,242	76,870	62,231

8 Credit loss expense

The table below shows the ECL charges on financial instruments for the year recorded in profit or loss for the period ended **30 September 2019**:

Note	Stage 1	Stage 1	Stage 2	Stage 2	Stage 3	Total	Q3 2019	Q3 2018	YTD SEPT 2018
	Individual	Collective	Individual	Collective			N'million	N'million	N'million
Balances with Central Bank of Nigeria	-	-	-	-	-	-	-	-	-
Due from banks	-	1	-	-	-	1	(109)	-	-
Loans and advances to customers	-	(11,613)	-	5,428	1,805	(4,380)	1,452	691	3,285
Debt instruments measured at FVOCI	-	94	-	-	-	94	(80)	-	-
Debt instruments measured at amortised costs	-	(181)	-	-	-	(181)	(96)	-	-
Financial guarantees	-	1	-	-	-	1	1	-	-
Loan commitments	-	-	-	-	-	-	-	-	-
Letters of credit	-	(526)	-	-	-	(526)	(686)	-	-
Total impairment loss	-	(12,223)	-	5,428	1,805	(4,990)	483	691	3,285
Other assets	-	147	-	-	-	147	147	-	-
Total impairment loss	-	(12,076)	-	5,428	1,805	(4,843)	630	691	3,285

9 Net fee and commission income

Fee and commission income is disaggregated below and includes a total fees in scope of IFRS 15, Revenues from Contracts with Customers:

	Q3 2019	Q3 2018	YTD SEPT 2019	YTD SEPT 2018
	N'million	N'million	N'million	N'million
Fee and commission type:				
ATM charges	1,236	880	3,227	2,620
Accounts maintenance charge	801	705	2,485	2,104
Commission on travellers cheque and foreign bills	810	634	2,357	1,769
Commission on E-banking activities	1,027	440	2,625	1,366
Commission on fidelity connect	359	318	1,239	982
Other fees and commissions	(315)	307	451	867
Commission and fees on banking services	(256)	126	440	361
Commission and fees on NXP	469	158	887	510
Collection fees	(304)	326	23	906
Telex fees	111	171	783	504
Cheque issue fees	(16)	41	129	130
Letters of credit commissions and fees	513	261	1,045	883
Commissions on off balance sheet transactions	987	216	1,074	950
Remittance fees	51	46	162	110
Total revenue from contracts with customers	5,475	4,630	16,928	14,063
Other non-contract fee income:				
*Credit related fees	718	527	2,335	1,005
Total fees and commission income	6,193	5,156	19,262	15,068
Fee and commission expense	(1,369)	(851)	(3,770)	(2,610)
Net fee and commission income	4,824	4,305	15,492	12,457

10 Other operating income

	Q3 2019	Q3 2018	YTD SEPT 2019	YTD SEPT 2018
	N'million	N'million	N'million	N'million
Net foreign exchange gains	(626)	1,012	2,328	2,641
Dividend income (Note 22.7)	20	88	1,392	229
Profit on disposal of property, plant and equipment	2,421	(17)	2,506	11
Profit on disposal of unquoted securities	-	-	-	-
Other income	105	114	450	654
	1,920	1,197	6,676	3,535

11 Net gains from financial instruments classified as fair value through profit or loss

	Q3 2019	Q3 2018	YTD SEPT 2019	YTD SEPT 2018
	N'million	N'million	N'million	N'million
Net losses from financial instruments classified as held for trading				
Net (losses)/gains arising from:				
- Bonds	(58)	19	104	(132)
- Treasury bills	257	10	224	(124)
	0	-	-	0
	200	29	329	(256)
Net losses from financial instruments classified as held for trading				
*Interest income on financial assets measured at FVTPL are not calculated using the effective interest rate method and have been presented separately in the Interim Statement of Profit or Loss and other comprehensive income	1,018	(744)	2,558	2,634
	1,018	(744)	2,558	2,634

12 Personnel expenses

	Q3 2019	Q3 2018	YTD SEPT 201	YTD SEPT 2018
	N'million	N'million	N'million	N'million
Wages and salaries	6,476	6,248	17,013	16,747
End of the year bonus (see note 29)	(1,137)	-	-	-
	5,338	6,248	17,013	16,747

13 Depreciation and Amortisation

	Q3 2019	Q3 2018	YTD SEPT 201	YTD SEPT 2018
	N'million	N'million	N'million	N'million
Depreciation (Note 23)	801	734	2,320	2,813
Intangible-computer software (Note 25)	580	82	1,099	819
Depreciation of ROU asset (Note 28)	131	-	470	-
	1,512	816	3,889	3,632

14 Other operating expenses

	Q3 2019	Q3 2018	YTD SEPT 201	YTD SEPT 2018
	N'million	N'million	N'million	N'million
Marketing, communication & entertainment	2,673	1,902	7,103	5,581
Banking sector resolution cost	2,834	2,471	8,073	6,293
Deposit insurance premium	1,258	803	3,624	2,507
Outsourced cost	1,108	1,033	3,232	2,968
Repairs and maintenance	775	778	2,434	2,073
Computer expenses	666	840	2,362	3,036
Security expenses	329	312	782	932
Other expenses	836	867	2,588	1,136
Rent and rates	67	221	185	661
Training expenses	141	100	357	529
Cash movement expenses	241	209	858	599
Travelling and accommodation	238	202	813	574
Consultancy expenses	576	181	1,163	535
Corporate finance expenses	171	132	443	435
Legal expenses	248	120	577	396
Electricity	115	107	356	336
Office expenses	61	114	484	312
Directors' emoluments	94	62	330	258
Insurance expenses	90	93	292	287
Stationery expenses	81	71	230	200
Bank charges	154	71	387	198
Auditors' remuneration	50	80	150	180
Telephone expenses	25	24	71	76
Postage and courier expenses	28	40	83	75
	12,858	10,833	36,976	30,177

15 Taxation

	Q3 2019	Q3 2018	YTD SEPT 201	YTD SEPT 2018
	N'million	N'million	N'million	N'million
a Current taxes on income for the reporting period	795	705	1,310	2,006
Technology levy	80	71	230	201
Police Trust Fund	-	-	2	-
Current income tax expense	875	776	1,542	2,207
Deferred tax expense	-	-	-	-
Income tax expense	875	776	1,542	2,207

16 Net reclassification adjustments for realised net gains

The net reclassification adjustments for realised net (gains)/ losses from other comprehensive income to profit or loss are in

17 Earnings per share (EPS)**Basic and Diluted**

Basic earnings per share is calculated by dividing the net profit attributable to equity holders of the Bank by the weighted average number of ordinary shares in issue during the period. The diluted earnings per share is the same as basic EPS because there are no potential ordinary shares outstanding during the reporting period.

	Q3 2019	Q3 2018	YTD SEPT 201	YTD SEPT 2018
	N'million	N'million	N'million	N'million
Profit attributable to equity holders of the Bank	7,078	6,277	21,462	17,857
Weighted average number of ordinary shares in issue	28,963	28,963	28,963	28,963
Basic & diluted earnings per share (expressed in kobo per share)	24	22	74	62

18 Cash and balances with central bank

	30 Sept 2019	30 Sept 2018	31 December 2018
	N'million	N'million	N'million
Cash	28,006	24,711	44,624
Balances with central bank other than mandatory reserve deposits	79,008	54,791	90,693
Included in cash and cash equivalents (note 19)	107,014	79,503	135,317
Mandatory reserve deposits with central bank (see note 18.1 below)	281,053	237,393	219,386
Special cash reserve (see note 18.2 below)	30,228	30,228	30,228
Carrying amount	418,295	347,123	384,931

18.1 Mandatory reserve deposits are not available for use in the Bank's day-to-day operations. It represents a percentage of the Customers' deposits and are non interest-bearing. The amount, which is based on qualified assets, is determined by the Central Bank of Nigeria from time to time. For the purpose of statement of cash flows, these balances are excluded from the cash and cash equivalents.

18.2 Special cash reserve represents a 5% of weekly average of deposits held with Central Bank of Nigeria as a regulatory requirement.

19 Cash and cash equivalents

Cash and cash equivalents comprise balances with less than three months' maturity from the date of acquisition, including cash on hand, deposits held at call with other banks and other short-term highly liquid investments with original maturities of less than three months.

	30 Sept 2019	30 Sept 2018	31 December 2018
	N'million	N'million	N'million
Cash and balances with central bank (Note 18)	107,014	79,503	135,317
Due from banks	140,454	167,852	111,633
Total cash and cash equivalents	247,468	247,355	246,950

20 Due from banks

	30 Sept 2019	30 Sept 2018	31 December 2018
	N'million	N'million	N'million
Current accounts with foreign banks	37,956	77,985	53,684
Placements with other banks and discount houses	103,306	89,867	58,755
Sub-total	141,261	167,852	112,439
Less: Allowance for impairment losses	(807)	-	(806)
	140,454	167,852	111,633

Impairment allowance for due from banks

The table below shows the credit quality and the maximum exposure to credit risk based on the external credit rating system and year-end stage classification. The amounts presented are gross of impairment allowances.

	2019			
	Stage 1 individual	Stage 2 Individual	Stage 3 Individual	Total
	N'million	N'million	N'million	N'million
External rating grade				
Performing				
High grade	99,901	-	-	99,901
Standard grade	40,553	-	-	40,553
Total	140,454	-	-	140,454

20 Due from banks - continued

An analysis of changes in the gross carrying amount and the corresponding ECL allowances is, as follows:

	Stage 1 N'million	Stage 2 N'million	Stage 3 N'million	Total N'million
Gross carrying amount as at 1 January 2019	112,439	-	-	112,439
New assets originated or purchased	124,412	-	-	124,412
Assets derecognised or repaid (excluding write offs)	(101,492)	-	-	(101,492)
Accrued Interest	4,575	-	-	4,575
Foreign exchange adjustments	520	-	-	520
At 30 September 2019	140,454	-	-	140,454

	Stage 1 individual N'million	Stage 2 Individual N'million	Stage 3 Individual N'million	Total N'million
ECL allowance as at 1 January 2019	806	-	-	806
New assets originated or purchased	936	-	-	936
Assets derecognised or repaid (excluding write offs)	(964)	-	-	(964)
Foreign exchange adjustments	29	-	-	29
At 30 September 2019	807	-	-	807

Contractual amounts outstanding in relation to Due from banks that were still subject to enforcement activity, but otherwise had already been written off, were nil both at 30 Sept 2019 and at 31 December 2018.

21 Loans and advances to customers

	30 Sept 2019 N'million	30 Sept 2018 N'million	31 December 2018 N'million
Loans to corporate and other organisations	1,079,274	852,195	743,308
Loans to individuals	47,186	35,353	163,315
	1,126,460	887,549	906,623
Less: Allowance for ECL/impairment losses	(52,364)	(57,174)	(56,743)
	1,074,096	830,375	849,880

21 Loans and advances to customers - continued

	30 Sept 2019 N'million	30 Sept 2018 N'million	31 December 2018 N'million
Loans to corporate entities and other organisations			
Overdrafts	131,821	71,362	57,572
Term loans	929,759	751,706	659,101
Advance under finance lease	17,694	29,127	26,634
	1,079,274	852,195	743,307
Less: Allowance for ECL/impairment losses	(50,221)	(54,292)	(42,036)
	1,029,053	797,903	701,271
Loans to individuals			
Overdrafts	4,970	5,252	7,314
Term loans	41,850	29,874	155,802
Advance under finance lease	366	227	201
	47,186	35,353	163,317
Less: Allowance for ECL/impairment losses	(2,143)	(2,882)	(14,708)
	45,043	32,472	148,609
Net loans and advances include	1,074,096	830,375	849,880

21.1 Impairment allowance for loans and advances to customers

21.1.1 Corporate and other organisations

The table below shows the credit quality and the maximum exposure to credit risk based on the Bank's internal credit rating system and year-end stage classification. The amounts presented are gross of impairment allowances.

	30 September 2019				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
Internal Grading Performance					-
Performing					-
High grade (AAA - A)	258,046	69,445	-	-	327,491
Standard grade (BBB - B)	502,314	197,598	-	-	699,912
Sub-standard grade (CCC)	-	1,101	-	-	1,101
Non-performing:	-	-	-	-	-
Individually impaired	-	-	50,769	-	50,769
Total	760,360	268,144	50,769	-	1,079,274

	31 December 2018				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
Internal Grading Performance					-
Performing					-
High grade (AAA - A)	15,131	-	-	-	15,131
Standard grade (BBB - B)	524,831	169,408	-	-	694,239
Sub-standard grade (CCC - C)	-	-	-	-	-
Non-performing:	-	-	-	-	-
Individually impaired	-	-	33,937	-	33,937
Total	539,962	169,408	33,937	-	743,307

An analysis of changes in the gross carrying amount and the corresponding ECL allowances in relation to Corporate lending is, as follows:

	30 September 2019				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
at					
1 January 2019	539,962	169,408	33,937	-	743,307
New assets originated or purchased	690,670	-	-	-	690,670
Assets derecognised or repaid (excluding write	(279,146)	(103,092)	(13,124)	-	(395,363)
Transfers to Stage 1	(19,206)	20,107	(901)	-	-
Transfers to Stage 2	(185,152)	181,855	3,297	-	(0)
Transfers to Stage 3	(35)	(3,167)	3,202	-	-
Accrued Interest	12,676	2,854	22,123	-	37,653
Foreign exchange adjustments	592	179	2,235	-	3,007
At 30 September 2019	760,360	268,144	50,769	-	1,079,274

21 Loans and advances to customers - continued

	30 September 2019				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
2019	11,155	16,454	14,427	-	42,036
New assets originated or purchased	4,580	-	-	-	4,580
offs)	(10,960)	(5,180)	(6,627)	-	(22,767)
Transfers to Stage 1	86	(86)	-	-	-
Transfers to Stage 2	(2,771)	3,798	(1,027)	-	-
Transfers to Stage 3	-	3,042	(3,042)	-	-
Accrued Interest	-	3,256	20,215	-	23,470
Foreign exchange adjustments	203	643	2,056	-	2,902
At 30 September 2019	2,293	21,926	26,002	-	50,221

	31 December 2018				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
Gross carrying amount as at 1 January 2018	580,934	91,212	79,333	-	751,479
New assets originated or purchased	282,912	-	-	-	282,912
Assets derecognised or repaid (excluding write off)	(208,289)	(1,178)	(78,534)	-	(288,001)
Transfers to Stage 1	44,392	(44,392)	-	-	-
Transfers to Stage 2	(164,415)	164,580	(165)	-	-
Transfers to Stage 3	-	(41,603)	41,603	-	-
Accrued interest	3,458	703	317	-	4,478
Amounts written off	-	-	(8,782)	-	(8,782)
Foreign exchange adjustments	970	86	165	-	1,221
At 31 December 2018	539,962	169,408	33,937	-	743,307

	31 December 2018				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
ECL allowance as at 1 January 2018	10,952	16,376	14,388	-	41,716
New assets originated or purchased	4,577	-	-	-	4,577
Assets derecognised or repaid (excluding write off)	(2,545)	(1)	(4,535)	-	(7,081)
Transfers to Stage 1	166	(166)	-	-	-
Transfers to Stage 2	(2,083)	2,083	-	-	-
Transfers to Stage 3	-	(2,640)	2,640	-	-
ECL of exposures transferred between stages during the period	56	524	1,633	-	2,213
Amounts written off	32	278	301	-	611
At 31 December 2018	11,155	16,454	14,427	-	42,036

The contractual amount outstanding on loans that have been written off, but were still subject to enforcement activity was nil at 30 September 2019 (2018: nil).

The increase in ECLs of the portfolio was driven by an increase in the gross size of the portfolio and movements between

21.1.2 Loans to individuals

The table below shows the credit quality and the maximum exposure to credit risk based on the Bank's internal credit rating system and year-end stage classification. The amounts presented are gross of impairment allowances.

	30 September 2019				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
Internal Grading Performance					
Performing					
High grade (AAA - A)	274	-	-	-	274
Standard grade (BBB - B)	43,702	114	-	-	43,816
Sub-standard grade (CCC)	-	13	-	-	13
Past due but not impaired (C)	-	-	-	-	-
Non-performing	-	-	3,083	-	3,083
Individually impaired	-	-	-	-	-
Total	43,976	126	3,083	-	47,186

	31 December 2018				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
Internal Grading Performance					
Performing					
High grade (AAA - A)	-	-	-	-	-
Standard grade (BBB - B)	107,641	-	-	-	107,641
Sub-standard grade (CCC)	34,534	3,476	-	-	38,010
Past due but not impaired (C)	-	-	-	-	-
Non-performing	-	-	-	-	-
Individually impaired	-	-	17,666	-	17,666
Total	142,175	3,476	17,666	-	163,317

21 Loans and advances to customers - continued

An analysis of changes in the gross carrying amount and the corresponding ECL allowances in relation to individual lending is, as follows:

	30 September 2019				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
Gross carrying amount as at 1 January 2019	142,175	3,476	17,666	-	163,317
New assets originated or purchased	71,583	-	-	-	71,583
Assets derecognised or repaid (excluding write o	(170,291)	(4,287)	(18,558)	-	(193,135)
Transfers to Stage 1	(28)	28	-	-	-
Transfers to Stage 2	(290)	284	6	-	0
Transfers to Stage 3	-	(236)	236	-	-
Accrued Interest	-	-	-	-	-
Foreign exchange adjustments	737	145	3,398	-	4,280
At 30 September 2019	43,976	126	3,083	-	47,186

	30 September 2019				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
ECL allowance as at 1 January 2019	3,300	48	11,360	-	14,708
New assets originated or purchased	503	-	-	-	503
Assets derecognised or repaid (excluding write o	(58)	(0)	(287)	-	(346)
Transfers to Stage 1	-	-	-	-	-
Transfers to Stage 2	(79)	79	-	-	-
Transfers to Stage 3	-	(81)	81	-	-
Changes in ECL during the period	(3,169)	(105)	(9,649)	-	(12,923)
Foreign exchange adjustments	53	63	85	-	201
At 30 September 2019	550	4	1,590	-	2,143

	31 December 2018				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
Gross carrying amount as at 1 January 2018	38,424	149	5,264	-	43,837
New assets originated or purchased	149,368	-	-	-	149,368
Assets derecognised or repaid (excluding write o	(22,581)	(124)	(1,143)	-	(23,848)
Transfers to Stage 1	1,027	(1,027)	-	-	-
Transfers to Stage 2	(24,412)	25,166	(754)	-	-
Transfers to Stage 3	-	(20,715)	20,715	-	-
Accrued Interest	349	27	128	-	504
Amounts written off	-	-	(6,544)	-	(6,544)
Foreign exchange adjustments	-	-	-	-	-
At 31 December 2018	142,175	3,476	17,666	-	163,317

	31 December 2018				
	Stage 1	Stage 2	Stage 3	POCI	Total
	Individual	Individual			
N'million	N'million	N'million	N'million	N'million	
ECL allowance as at 1 January 2018	388	1,467	10,754	-	12,609
New assets originated or purchased	4,039	-	-	-	4,039
Assets derecognised or repaid (excluding write o	(509)	(1)	(910)	-	(1,420)
Transfers to Stage 1	36	(36)	-	-	-
Transfers to Stage 2	(835)	1,060	(225)	-	-
Transfers to Stage 3	-	(2,448)	2,448	-	-
Impact on year end ECL of exposures transferred between stages during the year	181	6	5,837	-	6,024
Amounts written off	-	-	(6,544)	-	(6,544)
Foreign exchange adjustments	-	-	-	-	-
At 31 December 2018	3,300	48	11,360	-	14,708

The increase in ECLs of the portfolio was driven by an increase in the gross size of the portfolio and movFurther analysis of economic factors is outlined in Note 3.

21.2 Advances under finance lease may be analysed as follows:

	30 Sept 2019 N'million	31 December 2018 N'million
Gross investment		
- No later than 1 year	60	4,003
- Later than 1 year and no later than 5 years	11,436	20,474
- Later than 5 years	6,563	2,358
	18,059	26,835
Unearned future finance income on finance leases	(229)	(201)
Net investment	17,830	26,634

The net investment may be analysed as follows:

- No later than 1 year	60	3,987
- Later than 1 year and no later than 5 years	11,271	19,888
- Later than 5 years	6,500	2,760
	17,830	26,634

21.3 Nature of security in respect of loans and advances:

	30 Sept 2019 N'million	31 December 2017 N'million
Secured against real estate	373,914	63,635
Secured by shares of quoted companies	49,621	-
Secured others	670,631	807,582
Advances under finance lease	19,773	26,835
Unsecured	12,521	8,571
Gross loans and advances to customers	1,126,460	906,623

22 Investments

22.1 Financial assets at fair value through profit and loss (FVTPL)

	30 Sept 2019 N'million	30 Sept 2018 N'million	31 December 2018 N'million
Held for trading:			
Federal Government bonds	1,092	-	86
Treasury bills	20,733	9,620	13,966
Total financial assets measured at FVTPL	21,825	9,620	14,052

22.2 Debt instruments at fair value through other comprehensive income (FVOCI)

	30 Sept 2019 N'million	30 Sept 2018 N'million	31 December 2018 N'million
Treasury bills	63,135	123,455	137,545
Federal Government bonds	13,189	9,115	14,131
State bonds	4,238	6,371	4,437
Corporate bonds	12,969	-	1,526
Total debt instruments measured at FVOCI	93,532	138,940	157,639

22.3 Equity instruments at fair value through other comprehensive income (FVOCI)

	30 Sept 2019 N'million	30 Sept 2018 N'million	31 December 2018 N'million
Unquoted equity investments:			
- Mobile Telecommunications Network (MTN)	-	3,086	2,474
- African Finance Corporation (AFC)	2,198	2,802	2,377
- Unified Payment Services Limited (UPSL)	7,767	1,509	1,969
- Nigerian Inter Bank Settlement System (NIBBS)	1,072	1,287	1,475
- The Central Securities Clearing System (CSCS)	2,381	322	1,682
Total equity instruments at FVOCI	13,418	9,006	9,977

	30 Sept 2019 N'million	30 Sept 2018 N'million	31 December 2018 N'million
22.4 Debt instruments at amortised cost			
Treasury bills	47,498	19,155	37,725
Federal Government bonds	69,076	72,274	75,146
State Government bonds	1,310	2,229	2,129
Corporate bonds	-	3,585	3,872
Sub-total	117,885	97,243	118,872
Allowance for impairment	(29)	(6)	(210)
Total debt instruments measured at amortised cost	117,856	97,237	118,662

22.7 Pledged assets

Treasury Bills and Bonds are pledged to the Nigerian Inter Bank Settlement System Company Plc (NIBSS) in respect of the Bank's ongoing participation in the Nigerian settlement system. The Bank pledged Treasury bills, Bonds and cash balance in its capacity as collection bank for government taxes and Interswitch electronic card transactions. The Bank also pledged Federal Government bonds and Corporate bonds denominated in foreign currency to Renaissance Capital in respect of its short term borrowings.

The nature and carrying amounts of the assets pledged as collaterals are as follows:

	30 Sept 2019 N'million	30 Sept 2018 N'million	31 December 2018 N'million
Treasury bills - Amortised cost	26,925	11,339	17,727
Corporate Bonds - Amortised cost	-	3,579	3,835
Federal Government bonds - Amortised cost	51,399	34,957	53,666
Federal Government bonds - FVOCI	-	-	-

More information regarding the valuation methodologies can be found in Note 3.

22.8 Impairment losses on financial investments subject to impairment assessment

22.8.1 Debt instruments measured at FVOCI

The table below shows the fair value of the Bank's debt instruments measured at FVOCI by credit risk, based on the Bank's internal credit rating system and year-end stage classification.

	30 September 2019			
	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
Internal Grading Performing				
High grade	80,562	-	-	80,562
Standard grade	12,969	-	-	12,969
Total	93,532	-	-	93,532

	31 December 2018			
	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
Internal Grading Performing				
High grade	151,676	-	-	151,676
Standard grade	5,963	-	-	5,963
Total	157,639	-	-	157,639

An analysis of changes in the fair value and the corresponding ECLs is, as follows:

	30 September 2019			
	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
Gross Carrying amount as at 1 January 2019	157,639	-	-	157,639
New assets purchased	108,986	-	-	108,986
Assets derecognised or matured (excluding write-offs)	(175,289)	-	-	(175,289)
Accrued Interest	952	-	-	952
Changes in fair value	1,244	-	-	1,244
At 30 September 2019	93,532	-	-	93,532

	30 September 2019			
	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
ECL allowance as at 1 January 2019	279	-	-	279
New assets purchased	319	-	-	319
Assets derecognised or matured (excluding write offs)	(145)	-	-	(145)
Foreign Exchanges Adjustment	(80)	-	-	(80)
At 30 September 2019	373	-	-	373

31 December 2018

	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
Gross Carrying amount as at 1 January 2018	63,108	-	-	63,108
New assets purchased	246,754	-	-	246,754
Assets derecognised or matured (excluding write-offs)	(156,482)	-	-	(156,482)
Accrued Interest	1,835	-	-	1,835
Changes in fair value	2,424	-	-	2,424
At 31 December 2018	157,639	-	-	157,639

31 December 2018

	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
ECL allowance as at 1 January 2018	9	-	-	9
New assets purchased	375	-	-	375
Assets derecognised or matured (excluding write offs)	(105)	-	-	(105)
At 31 December 2018	279	-	-	279

22.8.2 Debt instruments measured at amortised cost

The table below shows the credit quality and the maximum exposure to credit risk per based on the Bank's internal credit rating system and year-end stage classification. The amounts presented are gross of impairment allowances.

30 September 2019

	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
Internal rating grade				
Performing				
High grade	116,574	-	-	116,574
Standard grade	1,310	-	-	1,310
Total	117,885	-	-	117,885

31 December 2018

	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
Internal rating grade				
Performing				
High grade	112,871	-	-	112,871
Standard grade	6,001	-	-	6,001
Total	162,537	-	-	118,872

An analysis of changes in the gross carrying amount and the corresponding ECLs is, as follows:

30 September 2019

	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
Gross carrying amount as at 1 January 2019	118,872	-	-	118,872
New assets originated or purchased	60,519	-	-	60,519
Assets derecognised or matured (excluding write-offs)	(63,639)	-	-	(63,639)
Accrued Interest	2,008	-	-	2,008
Foreign exchange adjustments	125	-	-	125
At 30 September 2019	117,885	-	-	117,885

31 December 2018

	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
Gross carrying amount as at 1 January 2018	116,026	-	-	116,026
New assets originated or purchased	51,373	-	-	51,373
Assets derecognised or matured (excluding write-offs)	(51,842)	-	-	(51,842)
Accrued Interest	2,871	-	-	2,871
Foreign exchange adjustments	444	-	-	444
At 31 December 2018	118,872	-	-	118,872

30 September 2019

	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
ECL allowance as at 1 January 2019	210	-	-	210
New assets purchased	137	-	-	137
Assets derecognised or matured (excluding write offs)	(212)	-	-	(212)
Changes in ECL during the period	(106)	-	-	(106)
At 30 September 2019	29	-	-	29

31 December 2018

	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
	N'million	N'million	N'million	N'million
ECL allowance as at 1 January 2018	11	-	-	11
New assets purchased	264	-	-	264
Assets derecognised or matured (excluding write offs)	(65)	-	-	(65)
Changes in ECL during the period	-	-	-	-
At 31 December 2018	210	-	-	210

**Notes to the financial statements
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23 Property, plant and equipment

	Land	Buildings	Leasehold Improvements	Office Equipment	Furniture & fittings	Computer equipment	Motor Vehicles	Work in Progress	Total
	N'million	N'million	N'million	N'million	N'million	N'million	N'million	N'million	N'million
Cost									
At 1 January 2019	15,303	16,648	8,013	8,908	2,254	13,673	6,015	1,477	72,291
Additions	179	57	105	70	18	2,930	148	671	4,178
Reclassifications	-	281	-	550	-	-	-	(831)	-
Transfer to ROU asset (Note 2.1.2)	-	-	(4,449)	-	-	-	-	-	(4,449)
Disposals	(343)	(43)	-	(124)	(5)	(7)	(452)	-	(974)
At 30 September 2019	15,139	16,943	3,669	9,404	2,267	16,596	5,711	1,317	71,046
Accumulated depreciation									
At 1 January 2019	-	(2,798)	(5,914)	(7,522)	(1,971)	(11,979)	(5,198)	-	(35,382)
Charge for the period	-	(250)	(144)	(433)	(85)	(1,060)	(327)	-	(2,299)
Reclassifications	-	-	-	-	-	-	-	-	-
Transfer to ROU asset (Note 2.1.2)	-	-	3,698	-	-	-	-	-	3,698
Disposals	-	3	1	120	2	3	446	-	576
At 30 September 2019	-	(3,045)	(2,359)	(7,835)	(2,054)	(13,036)	(5,078)	-	(33,407)
Carrying amount at 30 September 2019	15,139	13,898	1,310	1,569	213	3,560	633	1,317	37,639
Cost									
At 1 January 2018	15,066	16,128	7,669	8,296	2,128	12,971	5,914	2,236	70,408
Additions	242	-	353	125	129	552	449	431	2,281
Reclassifications	-	523	-	501	-	166	-	(1,190)	-
Disposals	(5)	(3)	(9)	(14)	(3)	(16)	(348)	-	(398)
At 31 December 2018	15,303	16,648	8,013	8,908	2,254	13,673	6,015	1,477	72,291
Accumulated depreciation									
At 1 January 2018	-	(2,436)	(4,891)	(6,976)	(1,855)	(10,788)	(4,958)	-	(31,904)
Charge for the period	-	(362)	(1,023)	(559)	(118)	(1,201)	(552)	-	(3,815)
Disposals	-	-	-	13	2	10	312	-	337
At 30 December 2018	-	(2,798)	(5,914)	(7,522)	(1,971)	(11,979)	(5,198)	-	(35,382)
Carrying amount at 31 December 2018	15,303	13,850	2,099	1,386	283	1,694	817	1,477	36,909

24 Intangible assets - Computer software

	30 Sept 2019	30 Sept 2018	31 December 2018
	N'million	N'million	N'million
Cost			
Balance at beginning of year	4,188	3,361	3,361
Additions	1,614	1,510	2,879
Disposal during the period	(242)	(30)	(2,052)
Balance	5,560	4,841	4,188
Accumulated amortization			
Balance at beginning of year	3,112	2,732	2,732
Amortisation for the period/year	1,099	819	2,432
Disposal during the period	(275)	(30)	(2,052)
Balance	3,936	3,520	3,112
Carrying amount	1,624	1,321	1,076

These relate to purchased softwares.

The amortisation of intangible asset recognised in depreciation and amortisation in profit or loss was N1.099 billion for the period ended **30 September 2019** (30 September 2018: N819).

25 Right-of-use assets

	30 June 2019	31 December
	N'million	N'million
Cost		
Effect of adoption of IFRS 16	1,490	-
Additions	304	-
	1,794	-
Accumulated depreciation		
Balance at beginning of year	-	-
Depreciation for the period/year	(470)	-
Balance	(470)	-
Carrying amount	1,324	-

26 Other assets

	30 Sept 2019	30 Sept 2018	31 December 2018
	N'million	N'million	N'million
Financial assets			
Sundry receivables	36,262	29,164	25,525
Others	3,324	1,477	3,515
Investment in SMEIS	2,576	1,430	1,430
Shared Agent Network Expansion Facility (SANEF)	50	-	-
	42,212	32,072	30,470
Less:			
Specific allowances for impairment	(3,009)	(2,414)	(2,219)
	39,203	29,658	28,251
Non financial assets			
Prepayments	10,623	12,970	6,564
Other non financial assets	731	446	309
	11,354	13,415	6,873
Total	50,557	43,073	35,124

Reconciliation of allowance for impairment

	30 Sept 2019	30 Sept 2018	31 December 2018
	N'million	N'million	N'million
At beginning of the period	2,219	1,869	1,869
Charge for the period	790	545	350
At end of the period	3,009	2,414	2,219

27 Deposits from customers

	30 Sept 2019	30 Sept 2018	31 December 2018
	N'million	N'million	N'million
Demand	367,206	417,620	391,576
Savings	248,881	201,661	227,970
Term	226,570	253,035	172,178
Domiciliary	263,186	107,383	179,753
Others	10,574	7,131	7,936
	1,116,416	986,830	979,413
Current	1,116,416	986,830	979,413
Non-current	-	-	-
	1,116,416	986,830	979,413

28 Other liabilities

	30 Sept 2019	30 Sept 2018	31 December 2018
	N'million	N'million	N'million
Customer deposits for letters of credit	0	66,262	68,254
Accounts payable	75,769	39,149	81,235
Manager's cheque	3,442	3,442	3,961
FGN Intervention fund (see note 28.1)	236,619	136,988	133,840
Payable on E-banking transactions	18,024	16,923	8,282
Other liabilities/credit balances	1,714	7,675	3,051
Payable to staff	1	1	-
	335,568	270,441	298,623

28.1 Included in the FGN Intervention fund is CBN Bailout Fund of **N91.319 billion**. This represents funds for states in the Federation that are having challenges in meeting up with their domestic obligation including payment of salaries. The loan was routed through the Bank for on-lending to the states. The Bailout fund is for a tenor of 20 years at 7% per annum and availed for the same tenor at 9% per annum. Repayments are deducted at source, by the Accountant General of the Federation (AGF), as a first line charge against each beneficiary state's

28.2 **Offshore Refinance Facility** has been reclassified from Customer deposits for letters of credit to Debts issued and other borrowed funds based on regulatory advise

29 Provision

	30 Sept 2019	30 Sept 2018	31 December 2018
	N'million	N'million	N'million
Provisions for year end bonus (see note 29.2)	1,180	1,873	2,000
Provisions for litigations and claims	643	-	545
Provision for guarantees and letters of credit	274	-	798
	2,098	1,873	3,343
At 1 January	2,000	2,200	2,200
Arising during the period	1,137	1,873	2,000
Utilised	(1,957)	(2,200)	(2,200)
At the end of the period	1,180	1,873	2,000
29.1 Current Provision	1,823	1,413	2,798
Non-current provisions	958	460	545
	2,781	1,873	3,343

29.2 A provision has been recognised in respect of staff year end bonus, the provision has been recognised based on the fact that there is a constructive and legal obligation on the part of the Bank to pay bonus to staff where profit has been declared. The provision has been calculated as a percentage of the profit after tax.

29.3 Impairment losses on guarantees and letters of credit

An analysis of changes in the gross carrying amount and the corresponding allowances for impairment losses in relation to guarantees and letters of credit is as follows:

29.3.1 Performance Bonds and guarantees

The table below shows the credit quality and the maximum exposure to credit risk based on the Bank's internal credit rating system and year-end stage classification. Details of Bank's internal grading system are explained in Note 3.2.2 and policies on whether ECLs are calculated on an individual or collective basis are set out in Note 3.2.1.

	30 September 2019			
	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
Internal rating grade	N'million	N'million	N'million	N'million
Performing				
High grade	81,002	-	-	81,002
Standard grade	121,503	-	-	121,503
Non-performing				
Individually impaired	-	-	-	-
Total	202,505	-	-	202,505

	31 December 2018			
	Stage 1 Individual	Stage 2 Individual	Stage 3	Total
Internal rating grade	N'million	N'million	N'million	N'million
Performing				
High grade	-	-	-	-
Standard grade	224,981	-	-	224,981
Sub-standard grade	13,462	-	-	13,462
Non-performing				
Individually impaired	-	-	-	-
Total	238,443	-	-	238,443

29.3.1 Performance Bonds and guarantees - Contd

The table below shows the credit quality and the maximum exposure to credit risk based on the Bank's internal credit rating system and year-end stage classification.

	30 September 2019			
	Stage 1	Stage 2	Stage 3	Total
	Individual	Individual		
	N'million	N'million	N'million	N'million
Gross carrying amount as at 1 January	238,443	-	-	238,443
New exposures	92,427	-	-	92,427
Exposure matured/lapsed	(128,365)	-	-	(128,365)
At 30 Sept 2019	202,505	-	-	202,505

	30 September 2019			
	Stage 1	Stage 2	Stage 3	Total
	Individual	Individual		
	N'million	N'million	N'million	N'million
ECL allowance as at 1 January	1	-	-	1
New exposures	3	-	-	3
Exposure derecognised or m	(0)	-	-	-
Foreign exchange	-	-	-	-
At 30 September 2019	3	-	-	4

	31 December 2018			
	Stage 1	Stage 2	Stage 3	Total
	Individual	Individual		
	N'million	N'million	N'million	N'million
Gross carrying amount as at 1 January	231,014	-	-	231,014
New exposures	139,136	-	-	139,136
Exposure matured/lapsed	(131,707)	-	-	(131,707)
At 31 December 2018	238,443	-	-	238,443

	31 December 2018			
	Stage 1	Stage 2	Stage 3	Total
	Individual	Individual		
	N'million	N'million	N'million	N'million
ECL allowance as at 1 January	449	-	-	449
New exposures	136	-	-	136
Exposure derecognised or m	(584)	-	-	(584)
Foreign exchange adjustments	-	-	-	-
At 31 December 2018	1	-	-	1

29.3.2 Letters of credit

The table below shows the credit quality and the maximum exposure to credit risk based on the Bank's internal credit rating system and year-end stage classification.

	30 September 2019			
	Stage 1	Stage 2	Stage 3	Total
	Individual	Individual		
	N'million	N'million	N'million	N'million
Internal rating grade				
Performing				
High grade	60,817	-	-	60,817
Standard grade	91,225	-	-	91,225
Non-performing				
Individually impaired	-	-	-	-
Total	152,042	-	-	152,042

An analysis of changes in the outstanding exposures and the corresponding ECLs is, as follows:

	30 September 2019			
	Stage 1	Stage 2	Stage 3	Total
	Individual	Individual		
	N'million	N'million	N'million	N'million
Gross carrying amount as at 1 January	188,641	-	-	188,641
New exposures	141,598	-	-	141,598
Exposure matured/lapsed	(178,197)	-	-	(178,197)
At 30 September 2019	152,042	-	-	152,042

29.3.2 Letters of credit - continued

30 September 2019				
	Stage 1	Stage 2	Stage 3	Total
	Individual	Individual		
	N'million	N'million	N'million	N'million
ECL allowance as at 1 January:	797	-	-	797
New exposures	683	-	-	683
Exposure matured/lapsed	(1,209)	-	-	(1,209)
At 30 September 2019	271	-	-	271

31 December 2018				
	Stage 1	Stage 2	Stage 3	Total
	Individual	Individual		
	N'million	N'million	N'million	N'million
Gross carrying amount as at 1 J	138,975	-	-	138,975
New exposures	146,536	-	-	146,536
Exposure matured/lapsed	(96,870)	-	-	(96,870)
At 31 December 2018	188,912	-	-	188,912

31 December 2018				
	Stage 1	Stage 2	Stage 3	Total
	Individual	Individual		
	N'million	N'million	N'million	N'million
ECL allowance as at 1 January:	179	-	-	179
New exposures	679	-	-	679
Exposure matured/lapsed	(61)	-	-	(61)
At 31 December 2018	378,350	-	-	378,350

30 Debts issued and other borrowed funds

	30 Sept 2019 N'million	30 Sept 2018 N'million	31 December 2018 N'million
Long term loan from Proparco Paris (see note 30.1)	5,389	7,310	6,628
Long term loan from African Development Bank (ADB) (see note 30.2)	23,157	12,564	13,842
European Investment Bank Luxembourg (see note 30.3)	4,065	4,596	4,480
Loan from Mashreq Bank	-	18,113	19,627
\$400 Million Euro Bond issued (see note 30.5)	149,427	130,805	143,098
Local Bond issued (see note 30.6)	31,348	29,226	30,004
Repurchase transaction with Renaissance Capital (see note 30.7)	22,195	24,451	23,088
Offshore Refinance Facility from ABSA	2,738	-	-
Offshore Refinance Facility from ACCESS BANK	3,982	-	140
Offshore Refinance Facility from BANK OF BEIRUT	7,426	-	-
Offshore Refinance Facility from BRITISH ARAB BANK	82	-	-
Offshore Refinance Facility from BYBLOS BANK	1,618	-	238
Offshore Refinance Facility from CITI BANK	17,928	-	-
Offshore Refinance Facility from DEUTSCHE BANK	2,156	-	-
Offshore Refinance Facility from FCMB BANK	228	-	897
Offshore Refinance Facility from FIRST BANK	16,119	-	-
Offshore Refinance Facility from STANDARD BANK	2,246	-	-
Offshore Refinance Facility from UBA	582	-	-
Offshore Refinance Facility from UBS	1,159	-	436
Offshore Refinance Facility from UNION BANK	2,558	-	-
	294,401	227,066	242,479

30 Debts issued and other borrowed funds - continued

- 30.1 The amount of **N5.389 billion (31 Dec 2018: N6.628 billion)** represents the amortised cost balance on the syndicated on-lending facility of \$40million granted to the Bank by Proparco Paris on 4 April 2016 to mature on 4 April 2021 at an interest rate of Libor plus 4.75% per annum. The initial loan matured on 4 April 2016 and was renewed on the same day. The Principal and Interest are repaid semi-annually. The borrowing is an unsecured borrowing.
- 30.2 The amount of **N23.157 billion (31 Dec 2018: N13.842 billion)** represents the amortised cost balance in the on-lending facility of \$75million granted to the Bank by ADB on 6 October 2014. The first tranche of \$40million was disbursed on 6 October 2014 while the second tranche of \$35million was disbursed 15 July 2015 both to mature 6 October 2021 at an interest rate of Libor plus 4.75% per annum. Interest is repaid semi-annually, with principal repayment at maturity. The borrowing is an unsecured borrowing.
- 30.3 The amount of **N4.065 billion (31 Dec 2018: N4.480 billion)** represents the amortised cost balance in the on-lending facility of \$21.946 million granted to the Bank by European Investment Bank on 13 April 2015 to mature 2 March 2023 at an interest rate of Libor plus 3.99% per annum. Interest is repaid quarterly, with principal repayment at maturity. The borrowing is an unsecured borrowing.
- 30.5 On 11 October 2017, Fidelity Bank PLC issued a \$400 million five year Eurobond at a 10.50 percent coupon. The Bond was used to finance the existing bondholders who subscribed to the tender offer of \$256 million, while the balance (net of issuance costs) will be used to support the trade finance business of Fidelity Bank. The issuance of the Bond was part of a strategic liability management exercise designed to extend, Fidelity Bank's debt maturity profile and proactively refinance the maturing 2018 Eurobond. The amount of N143.563 billion (31 Dec 2018 : N143.098 billion) represents the amortised cost of \$400 million, 5- year, 10.50% Eurobond issued at 99.48% in October 2017. The principal amount is repayable in October 2022, while the coupon is paid semi annually.
- 30.6 The amount of **N31.334 billion**, (31 Dec 2018: N30.004 billion) represents the amortised cost of a N30 billion, 6.5- year, 16.48% Local bond issued at 96.5% in May 2015. The principal amount for the Local bonds is repayable in Nov 2021. The coupon is paid semi annually. The purpose of the Local bond issuance is to finance the SME business of the economy of Nigeria.
- 30.7 The amount of **N22.195 billion**, (31 Dec 2018: N23.088 billion) represents a \$33million dollar borrowing under a repurchase agreement from Renaissance Capital, with Fidelity Bank pledging its USD denominated Eurobond and FGN, which the Bank has the right to buy at a later date.
- 30.8 The **Offshore refinance facilities** from various Institutions represent confirmation lines availed the bank by offshore banks for it's customers in respect of Letters of credit. The total as at **September 2019 is N58.822Bn (Dec 2018: N1.712Bn**, Sept 2018: Nil) Prior to Sept 2019, these amounts were classified as Customer deposits for letters of credit under "Other Liabilities"

31 Share capital

	30 Sept 2017	30 Sept 2018	31 December 2018
	N'million	N'million	N'million
Authorised			
32 billion ordinary shares of 50k each (2017: 32 billion ordinary shares)	16,000	16,000	16,000
Issued and fully paid			
28,963 million ordinary shares of 50k each (2017: 28,963 million ordinary shares)	14,481	14,481	14,481

There is no movement in the issued and fully paid shares during the period.

32 Other equity accounts

The nature and purpose of the other equity accounts are as follows:

Share premium

Premiums from the issue of shares are reported in share premium.

Retained earnings

32 Other equity accounts - continued

Statutory reserve

This represents regulatory appropriation to statutory reserve of 30% of profit after tax if the statutory reserve is less than paid-up share capital and 15% of profit after tax if the statutory reserve is greater than the paid up share capital.

Small scale investment reserve

The Small scale investment reserve is made up of N764million maintained to comply with the Central Bank of Nigeria (CBN) requirement that all licensed banks set aside a portion of the profit after tax in a fund to be used to finance equity investment in qualifying small scale industries. Under the terms of the guideline (amended by a CBN letter dated 11 July 2006), the contributions will be 10% of profit after tax and shall continue after the first 5 periods but banks' contribution shall thereafter reduce to 5% of profit after tax. However, this is no longer mandatory. And N1,430million is 5% of 2016 & 2017 PAT which relates to AGSMEIS; Agri-Business/Small and Medium Enterprises Investment Scheme (AGSMEIS), the AGSMEIS is maintained to support the Federal Government's effort at promoting Agricultural businesses and Small and Medium Enterprises. Effective 2017 all Deposit Money Banks (DMBs) are required to set aside 5% of their Profit After Tax for equity investment in permissible activities as stipulated in the scheme guidelines. The fund is domiciled with CBN.

Non-distributable regulatory reserve

The amount at which the loan loss provision under IFRS is less than the loan loss provision under prudential guideline is booked to a non-distributable regulatory reserve.

Fair value reserves (2017: Available-for-sale reserve)

The fair value reserve includes the net cumulative change in the fair value of financial assets measured at fair value through other comprehensive income (2017: available-for-sale investments) until the investment is derecognised or impaired.

33 Cash flows from operations

	30 Sept 2019 N'million	31 December 2018 N'million
Profit before income tax	23,004	13,010
Adjustments for:		
– Depreciation and amortisation	3,889	2,816
– Profit from disposal of property and equipment	(2,506)	(28)
– Foreign exchange gains on operating activities	(2,328)	(1,629)
– Foreign exchange losses/(gains) on debts issued and other borrowed funds	3,929	21
– Foreign exchange losses/(gains) on loans and advances to customers	(38,530)	4
– Foreign exchange (gains)/losses on deposits from customers	41,860	(16)
– Net gains from financial assets classified as FVTPL	(329)	285
– Impairment charge on loans and advances	(4,843)	2,593
– Impairment charge on other assets	147	-
– Dividend income	(1,392)	(141)
– Gain on debt instruments measured at FVOCI reclassified from equity	96	(372)
– Net interest income	(58,246)	(30,887)
	(35,250)	(14,344)
Changes in operating assets		
– Cash and balances with the Central Bank (restricted cash)	(61,667)	(43,122)
– Loans and advances to customers	(180,843)	(132,929)
– Financial assets at fair value through profit or loss	8,102	12,874
– Other assets	(15,580)	(1,948)
Changes in operating liabilities		
– Deposits from customers	178,863	152,673
– Other liabilities	36,945	60,327
– Provisions	(1,245)	(1,638)
– Interest payable on debts issued and other borrowed funds	21,097	4,532
Cash flows from/(used in) operations	(49,578)	36,425

34 Contingent liabilities and commitments

34.1 Capital commitments

At the reporting date, the Bank had capital commitments amounting to **N2.0 billion** (31 Dec 2018: N1.7 billion).

34.2 Confirmed credits and other obligations on behalf of customers

In the normal course of business the Bank is a party to financial instruments with off-statement of financial position risk. These instruments are issued to meet the credit and other financial requirements of customers. The contractual amounts of the off-balance sheet financial instruments are:

	30 Sept 2019 N'million	31 December 2018 N'million
Performance bonds and guarantees	202,505	238,443
Letters of credit	152,042	188,641
AGSMEIS Disbursement	42	9
	354,590	427,093

Unsettled transactions are transaction that the Bank has entered into, but is either yet to make payment or receive payment in respect of these transactions.