	Modified Capital Disclosure	All-in	Transitional
	Common Equity Tier 1 Capital: instruments and reserves		
1	Directly issued qualifying common share capital (and equivalent for non-join stock companies) plus related stock surplus	6,259	
2	Retained Earnings	980	
3	Accumulated other comprehensive income (and other reserves)	436	
4	*Directly issued capital subject to phase out from CET1 (only applicable to non-joint stock companies)*	-	
5	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)	-	
6	**Common Equity Tier 1 capital before regulatory adjustments**	7,675	7,675
	Common Equity Tier 1 capital: regulatory adjustments		
28	Total regulatory adjustments to Common Equity Tier 1	2,336	
29	**Common Equity Tier 1 Capital (CET1)**	5,339	5,339
	Additional Tier 1 capital: instruments		
30	Directly issued qualifying Additional Tier 1 instruments plus related stock surplus	0	
31	of which: classified as equity under applicable accounting standards	1235	
32	of which: classified as liabilities under applicable accounting standards	0	
33	*Directly issued capital instruments subject to phase out from Additional Tier 1*	0	
34	Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group AT1)	0	
35	*of which: instruments issued by subsidiaries subject to phase out*	0	
36	**Additional Tier 1 capital before regulatory adjustments**	1235	
	Additional Tier 1 Capital: regulatory adjustments		
43	**Total regulatory adjustments to Additional Tier 1 capital**	0	
44	**Additional Tier 1 capital (AT1)**	0	
45	**Tier 1 Capital (T1 = CET1 + AT1)**	6,574	6,574
	Tier 2 capital: instruments and allowances		
46	Directly issued qualifying Tier 1 instruments plus related stock surplus	0	
47	*Directly issued capital instruments subject to phase out from Tier 2*	0	
48	Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier 2)	0	
49	*of which: insturments issued by subsidiaries subject to phase out*	0	
50	Collective allowances	0	
51	**Tier 2 capital before regualatory adjustments**	0	
	Tier 2 capital: regulatory adjustments		
57	**Total regulatory adjustments to Tier 2 capital**	0	
58	**Tier 2 capital (T2)**	0	
59	**Total capital (TC = T1 + T2)**	6,574	6,574
60	**Total risk-weighted assets**	23,318	23,318
60a	**Common Equity Tier 1 (CET1) Capital RWA**	23,318	23,318
60b	**Tier 1 Captial RWA**	23,318	23,318
60c	**Total Capital RWA**	23,318	23,318
	Capital Ratios		
61	Common Equity Tier 1 (as percentage of risk-weighted assets)	22.90%	22.90%
62	Tier 1 (as percentage of risk-weighted assets)	28.19%	28.19%
63	Total Capital (as percentage of risk-weighted assets)	28.19%	28.19%
	OSFI all-in target		
69	Common Equity Tier 1 capital all-in target ratio	7.0%	
70	Tier 1 capital all-in target ratio	8.5%	
71	Total capital all-in target ratio	10.5%	
	Capital Instruments subject to phase-out arrangements (only applicable between 1 Jan 2013 and 1 Jan 2022)		
80	*Current cap on CET1 instruments subject to phase out arrangement*	0	
81	*Amounts excluded from CET1 due to cap (excess over cap after redemptions and maturities)*	0	
82	*Current cap on AT1 instruments subject to phase out arrangements*	0	
83	*Amounts excluded from AT1 due to cap (excess over cap after redemptions and maturities)*	0	
84	*Current cap on T2 instruments subject to phase out arrangements*	0	
85	*Amounts excluded from T2 due to cap (excess over cap after redemptions and maturities)*	0	

Table ORA: General qualitative information on a bank's operational risk framework

Purpose: To describe the main characteristics and elements of a bank's operational risk management framework.

Content: Qualitative information.

Frequency: Annual.

Format: Flexible.

SMSBs must describe:	Comments:
(a) Policies, frameworks and guidelines for the management of operational risk.	The Company incurs operational risk in all its business activities. The capital charge for operational risk is determined using the basic indicator approach within the Basel III framework. Operational risk can never be fully eliminated, but it is adequately managed through frequent reviews of all the different aspects of this risk, such as file management, employee motivation and business interruption. Security and fraud risks, including the risk of a data breach, are threats which the Company is mitigating through enhanced technology services, and cybersecurity training and insurance.
(b) The structure and organisation of operational risk management and control function.	The operational risk management function is structured with oversight from the Board of Directors, supported by committees such as the Risk Oversight Committee, Audit Committee, and Risk Management Committee. The Chief Risk Management Officer (CRMO) reports directly to the Risk Oversight Committee and oversees risk management activities independently from operational management.
(c) Operational risk measurement system (ie the systems and data used to measure operational risk in order to estimate the operational risk capital charge).	The Simplified Standardized Approach
(d) The scope and main context of reporting framework on operational risk to executive management and to the board of directors.	Operational risk reporting is conducted regularly to executive management, the Board of Directors, and various committees. It encompasses information on risk exposures, trends, control effectiveness, compliance with risk limits, and significant incidents. Internal Audit reports directly to the Audit Committee, while senior management provides regular reports to the Board of Directors.
(e) The risk mitigation and risk transfer used in the management of operational risk. This includes mitigation by policy (such as the policies on risk culture, risk appetite, and outsourcing), by divesting from high-risk businesses, and by the establishment of controls. The remaining exposure can then be absorbed by the bank or transferred. For instance, the impact of operational losses can be mitigated with insurance.	Senior Management provides regular reports to the Board of Directors and its various committees about the operation of departments within the approved risk limits. The Internal Auditor provides quarterly reports directly to the Audit Committee. The Company has insurance to provide adequate protection against unexpected business interruptions.

Capital Ratios

Dollars in thousands

A Ratio Calculations

Common Equity Tier 1 (CET1) simplified risk-based capital ratio ratio (%)	22.90%
Tier 1 simplified risk-based capital ratio (%)	28.19%
Total simplified risk-based capital ratio (%)	28.19%

B Capital

Net CET1 capital	5339
Net Tier 1 capital	6574
Total capital	6574

C Adjusted Total Assets and Operational Risk RWA

Total Assets	18829
CET1 capital deductions	2336
Additional Tier 1 capital deductions	
Tier 2 capital deductions	
Adjusted Total Assets (CET1)	16493
Adjusted Total Assets (Tier 1)	16493
Adjusted Total Assets (Total Capital)	16493
Operational Risk RWA	6825