



**FINANCIAL  
STATEMENTS  
2019**



The management of Rizal Commercial Banking and Subsidiaries (the Group), is responsible for the preparation and fair presentation of the financial statements, including the schedules attached therein, as of and for the year ended December 31, 2019 (including the comparative financial statements as of December 31, 2018 and for the years ended December 31, 2018 and 2017), in accordance with the prescribed financial reporting framework indicated therein, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative to do so.

The Board of Directors is responsible for overseeing the Group's financial reporting process.

The Board of Directors reviews and approves the financial statements, including the schedules attached therein, and submits the same to the stockholders.

Punongbayan & Araullo, the independent auditors appointed by the stockholders, have audited the financial statements of the Group in accordance with Philippine Standards on Auditing, and in their report to the stockholders, have expressed their opinion on the fairness of presentation upon completion of such audit.



HELEN Y. DEE  
Chairperson, Board of Directors



HORACIO E. CEBRERO III  
SEVP, Head – Treasury Group



EUGENE S. ACEVEDO  
President & Chief Executive Officer



FLORENTINO M. MADONZA  
FSVP, Head – Controllership Group



**The Board of Directors and the Stockholders**  
**Rizal Commercial Banking Corporation**  
Yuchengco Tower, RCBC Plaza  
6819 Ayala Avenue cor. Sen. Gil Puyat Avenue  
Makati City

**Report on the Audit of the Financial Statements**

**Opinion**

We have audited the financial statements of Rizal Commercial Banking Corporation and subsidiaries (together hereinafter referred to as the Group) and of Rizal Commercial Banking Corporation (the Parent Company), which comprise the statements of financial position as at December 31, 2019 and 2018, and the statements of profit or loss, statements of comprehensive income, statements of changes in equity and statements of cash flows for each of the three years in the period ended December 31, 2019, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Group and of the Parent Company as at December 31, 2019 and 2018, and their financial performance and their cash flows for each of the three years in the period ended December 31, 2019 in accordance with Philippine Financial Reporting Standards (PFRS).

**Basis for Opinion**

We conducted our audits in accordance with Philippine Standards on Auditing (PSA). Our responsibilities under those standards are further described in the *Auditors' Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Group in accordance with the Code of Ethics for Professional Accountants in the Philippines (Code of Ethics) together with the ethical requirements that are relevant to our audits of the financial statements in the Philippines, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

**Key Audit Matters**

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

The following are the key audit matters identified in our audit of the financial statements of the Group and of the Parent Company:

**(a) Expected Credit Loss Model for Loans and Receivables**

*Description of the Matter*

As of December 31, 2019, the Group's and the Parent Company's ECL allowance for loans and receivables amounted to P13,430 million and P12,726 million, respectively. We have identified the Group's and the Parent Company's ECL model significant to our audit as this:

- requires significant management judgment on the interpretation and implementation of the requirements of PFRS 9, *Financial Instruments*, in assessing impairment losses based on an ECL model that involves segmenting credit risk exposures, defining when does default occur and what constitute a significant increase in the credit risk of different exposures;



- involves high degree of estimation uncertainty related to management's use of various inputs and assumptions applied in the ECL model such as credit risk rating of the counterparty, expected amount and timing of cash flows, including recovery of collaterals for defaulted accounts, and forward-looking macroeconomic information which may be affected by management estimation bias; and,
- requires complex estimation process that entails implementation of internal controls and use of information system in ensuring the completeness and accuracy of data used in the ECL calculation and in the preparation of required disclosures in the financial statements.

The summary of significant accounting policies, the significant judgment, including estimation applied by the management, as those related to the credit risk assessment process of the Group and the Parent Company are disclosed in Notes 2, 3 and 4 to the financial statements, respectively. The other disclosures related to this matter are presented in Notes 11 and 16.

*How the Matter was Addressed in the Audit*

We obtained an understanding of the Group's and the Parent Company's accounting policies and methodologies applied and we evaluated whether those: (a) are established and implemented consistent with the underlying principles of PFRS 9; (b) are appropriate in the context of the Group's lending activities and asset portfolio that takes into consideration the different segments of credit exposures and the relevant regulatory framework; and, (c) are supported by pertinent processes and controls, including documentations of the accounting policies that capture in sufficient detail the judgment, including estimation applied in the development of the ECL model.

With respect to the use of significant judgment, including those involving estimation of inputs and assumptions used in the ECL model, we performed the following:

- assessed the Group's and the Parent Company's segmentation of its credit risk exposures based on homogeneity of credit risk characteristics and evaluated the appropriateness of the specific model applied for each loan portfolio;
- evaluated both the quantitative and qualitative criteria applied in the definition of default against historical analysis for each segment of loan portfolio and in accordance with credit risk management practices, and tested the criteria in the determination of the significant increase in credit risk, including assignment of a loan or group of loans into different stages of impairment;
- tested the Group's and the Parent Company's application of internal credit risk rating system for selected items of loans, and verified the mapping of the ratings to the ECL calculation;
- tested loss given default information across various types of loan by inspecting records of historical recoveries and relevant costs, including valuation and cash flows from collateral, and write-offs;
- reconciled and tested exposure at default for all outstanding loans against the relevant loan databases, including review of the potential exposures from undrawn commitments against historical drawdown;
- assessed the appropriateness of the identification of forward-looking information (overlays) used in the ECL model and validated their reasonableness against publicly available information and our understanding of Group's and Parent Company's loan portfolios and industry where they operate; and,

- tested the effective interest rate used in discounting the expected credit loss.

As part of our audit of the ECL methodology, we tested the completeness and accuracy of the data used in the ECL model through reconciliation of loan data subjected to the ECL calculations, which were prepared by management outside its general ledger system, against the relevant financial reporting applications and other accounting records. Moreover, we tested the stratification of loan data that were disaggregated into various portfolio segments for purposes of ECL calculations. Furthermore, we tested the mathematical formula and the computation logics applied in the calculation of the different inputs in the ECL model and the estimation of the credit losses for all loans and receivables subjected to impairment assessment.

We evaluated the completeness of the disclosures in the financial statements against the requirements of the relevant standards.

**(b) Classification and Measurement of Financial Instruments**

**Appropriateness of Disposals of Investment Securities at Amortized Cost**

*Description of the Matter*

As of December 31, 2019, the Parent Company carries in its financial statements investment securities held under its hold-to-collect (HTC) business model, which are measured at amortized cost amounting to P100,219 million. In 2019, the Parent Company disposed of certain government and corporate debt securities denominated in peso and US dollar under its HTC portfolio with carrying amount of P101,425 million. The disposals were determined to be significant in value but infrequent.

Management assessed that such disposals remain to be consistent with the Parent Company's HTC business model with the objective of collecting contractual cash flows. The assessment to determine whether the disposal of the HTC securities is consistent with the Parent Company's HTC business model is considered a key audit matter because the assessment involves significant judgment such as on the evaluation of the frequency and significance of the disposals that may impact the appropriateness of the Parent Company's business model in managing financial instruments. The disclosures in relation to this matter are included in Note 10 while the disclosures regarding the Parent Company's assessment of the business model applied in managing financial instruments are presented in Note 3 to the financial statements.

*How the Matter was Addressed in the Audit*

We checked the appropriateness of the Parent Company's disposals of HTC securities by reviewing the documentation of the approval of the Parent Company's Executive Committee as required by the BSP. We assessed whether the disposals were made consistent with the permitted sale events documented in the Parent Company's business model in managing financial assets manual and with the relevant requirements of both the financial reporting standard and the BSP. We also assessed the appropriateness and reasonableness of the underlying data used and the rationale documented by the Parent Company in the determination of the amount of HTC securities disposed.



**Fair Value Measurement of Unquoted Securities Classified at Fair Value Through Other Comprehensive Income**

*Description of the Matter*

The Group and the Parent Company have significant investments in unquoted equity securities measured at fair value through other comprehensive income amounting to P1,612 million and P1,581 million, respectively, as of December 31, 2019. The valuation of these financial instruments involve complex valuation techniques (i.e., price-to-book value method and discounted cash flow method) and significant estimation which are highly dependent on underlying assumptions and inputs such as price-to-book ratios of selected comparable listed entities, application of a certain haircut rate, and appropriate discount rate in computing the present value of future cash flows expected from dividend or redemption payments. These inputs are considered Level 3 unobservable inputs in the fair value hierarchy under PFRS 13, *Fair Value Measurement*, as discussed in Notes 3 and 7 to the financial statements. Accordingly, we have assessed the valuation of the unquoted equity securities as a key audit matter.

*How the Matter was Addressed in the Audit*

We evaluated the appropriateness of management's valuation methodology in accordance with PFRS 13. For equity security valued using the price-to-book value method, we used our own internal valuation expert to assess and challenge the valuation assumptions used, including the identification and selection of comparable listed entities and the related financial information such as net book value per share and quoted prices of those listed entities. In testing the reasonableness of the haircut rate used, we reviewed available non-financial information relevant to the assessment of the potential marketability of the subject security, and the consistency of the application of the haircut rate used in prior period in light of the current industry and economic circumstances. With respect to the equity security measured using the discounted cash flow method, we evaluated the reasonableness of the amount of future cash flows from the dividend or redemption expected to be received from the counterparty, and the appropriate discount rate used. We also tested the mathematical accuracy of the calculation for both valuation techniques used by management.

**(c) Merger of the Parent Company and RCBC Savings Bank**

*Description of the Matter*

The Parent Company, together with RCBC Savings Bank (RSB), a wholly-owned subsidiary, executed a Plan of Merger on November 27, 2018, which was previously approved by all members of the Bank's Board of Directors (BOD) and by all the stockholders of the Bank on February 26, 2019. The same was filed with the Securities and Exchange Commission (SEC) and was subsequently approved on July 22, 2019.

The merger of the Parent Company and RSB was significant to our audit due to the significance and complexity of the transaction and in particular determining the correct accounting treatment of the transaction. Such merger is classified as business combination under common control and is out of scope of PFRS 3, *Business Combination*, and, accordingly, judgement is involved in the accounting, presentation and disclosure of the merger.

The Parent Company has accounted for the merger using the pooling of interest method, according to which the assets and liabilities of RSB are included in the Parent Company's financial statements at their book values, no goodwill is recognized as a result of the combination and comparatives are presented as if the entities had always been combined.

The Parent Company's disclosures of the merger and pooling of interest method are set out in Notes 1, 2, 3, and 34 to the financial statements.

*How the Matter was Addressed in the Audit*

Our audit response included the following:

- Reviewed the minutes meeting of the BOD for the approval of the merger and approval of the SEC;
- Reviewed the Articles and Plan of Merger to understand the key terms and conditions, and confirmed our understanding with the management;
- Evaluated the appropriateness of the pooling of interest method used by the management that includes identification of assets and liabilities in accordance with the terms of Articles and Plan of Merger;
- Reviewed the carrying values of assets and liabilities of RSB at the date of merger including adjustments for the merger as determined by the management, if any;
- Assessed the impact of merger adjustment on exchange of shares and the resultant increase in the common stock of the Parent Company; and,
- Assessed the adequacy of disclosures made in the financial statements of the Parent Company.

**(d) Adoption of PFRS 16, Leases**

*Description of the Matter*

As described in Note 2 to the financial statements, the Group and the Parent Company have adopted on January 1, 2019, PFRS 16, *Leases*, which replaced Philippine Accounting Standard (PAS) 17, *Leases*, and the related interpretations to PAS 17. The adoption of this new standard, which primarily affected the Group's and the Parent Company's accounting for leases as a lessee by recognizing "right-of-use" assets and lease liabilities "on-balance sheet", is considered significant due to the complexities of the accounting requirements, significant judgement involved in determining the assumptions to be used in applying the new standard and significant data extraction exercise was undertaken by management to summarize all lease data such that the respective inputs could be uploaded into management's model. Key areas of judgment include: determination of lease term of contracts with renewal and termination options, appropriate discount rate in measuring lease liabilities and leasing arrangements within the scope of PFRS 16.

As of December 31, 2019, the adoption of the new lease requirements under PFRS 16 resulted in an increase in total resources by P2,465 million for the Group and P2,401 million for the Parent Company and total liabilities by P2,877 million for the Group and P2,797 million for the Parent Company. The right-of-use assets and lease liabilities are presented as part of Bank Premises, Furniture, Fixtures and Equipment and Other Liabilities, respectively, in the statement of financial position.

In 2019, depreciation of right-of-use assets of the Group and the Parent Company amounted to P818 million and P807 million, respectively, while interest expense from the accretion of lease liabilities of the Group and the Parent Company amounted to P221 million and P222 million, respectively.

Refer to Notes 2, 13, and 22 of the financial statements for the disclosure on the transition adjustments and details of the right-of-use assets and lease liabilities using the requirements of PFRS 16.



#### *How the Matter was Addressed in the Audit*

Our audit procedures to address the significant risk of material misstatement relating to the adoption of PFRS 16 by the Group and the Parent Company included:

- Assessed the design of key internal controls relevant to management's process in reviewing the terms and conditions of the lease contracts and determination of the related PFRS 16 adjustments;
- Evaluated the accounting policies applied by the management including the use of practical expedients permitted by the standard;
- Verified the completeness of the lease databases used by validating and comparing the scope of the operating leases identified under the previously applicable standard, PAS 17, and reviewed the residual lease expenses;
- On a representative sample basis, evaluated the reasonableness and appropriateness of the inputs and assumptions used in determining the lease term, discount rates applied in determining lease liabilities;
- Verified the accuracy of the underlying lease databases by agreeing a representative sample of leases to original contract or other supporting information, and checked the integrity and mathematical accuracy of the PFRS 16 calculations for each lease sampled through recalculation of the expected PFRS 16 adjustment; and,
- Assessed whether the disclosures within the financial statements are appropriate in light of the requirements of PFRS 16 and PAS 8, *Accounting Policies, Changes in Accounting Estimates and Errors*.

#### **Other Information**

Management is responsible for the other information. The other information comprises the information included in the Group's and the Parent Company's Securities and Exchange Commission (SEC) Form 20-IS (Definitive Information Statement), SEC Form 17-A and Annual Report for the year ended December 31, 2019, but does not include the financial statements and our auditors' report thereon. The SEC Form 20-IS, SEC Form 17-A and Annual Report for the year ended December 31, 2019 are expected to be made available to us after the date of this auditors' report.

Our opinion on the financial statements does not cover the other information and we will not express any form of assurance conclusion thereon.

In connection with our audits of the financial statements, our responsibility is to read the other information identified above when it becomes available and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audits, or otherwise appears to be materially misstated.

#### **Responsibilities of Management and Those Charged with Governance for the Financial Statements**

Management is responsible for the preparation and fair presentation of the financial statements in accordance with PFRS, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Group's and the Parent Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group and the Parent Company or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's and the Parent Company's financial reporting process.

#### **Auditors' Responsibilities for the Audit of the Financial Statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with PSA will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with PSA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's and the Parent Company's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's and the Parent Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Group and the Parent Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.



- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes public disclosure about the matter or when, extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

#### Report on Other Legal and Regulatory Requirements

Our audits were conducted for the purpose of forming an opinion on the basic financial statements taken as a whole. As discussed in Note 26 to the financial statements, the Parent Company presented the supplementary information required by the Bureau of Internal Revenue under Revenue Regulations (RR) 15-2010 in a supplementary schedule filed separately from the basic financial statements. RR 15-2010 requires the supplementary information to be presented in the notes to financial statements. Such supplementary information is the responsibility of management. The supplementary information is not a required part of the basic financial statements prepared in accordance with PFRS; it is neither a required disclosure under the Revised Securities Regulation Code Rule 68 of the SEC.

The engagement partner on the audits resulting in this independent auditors' report is Anthony L. Ng.

#### PUNONGBAYAN & ARAULLO



By: **Anthony L. Ng**  
Partner

CPA Reg. No. 0109764  
TIN 230-169-270  
PTR No. 8116552, January 2, 2020, Makati City  
SEC Group A Accreditation  
Partner - No. 1638-A (until May 29, 2020)  
Firm - No. 0002-FR-5 (until Mar. 26, 2021)  
BIR AN 08-002511-038-2019 (until Sept. 4, 2022)  
Firm's BOA/PRC Cert. of Reg. No. 0002 (until Jul. 24, 2021)

February 24, 2020

Notes	GROUP		PARENT COMPANY			
	2019	2018	December 31, 2019	December 31, 2018 (As restated - see Note 34)	January 1, 2018 (As restated - see Note 34)	
<b>RESOURCES</b>						
	P	P	P	P	P	
CASH AND OTHER CASH ITEMS	9	16,907	17,392	16,808	17,321	14,861
DUE FROM BANGKO SENTRAL NG PILIPINAS	9	87,255	56,495	85,453	55,059	57,519
DUE FROM OTHER BANKS	9	18,818	20,342	18,468	19,815	19,469
LOANS ARISING FROM REVERSE REPURCHASE AGREEMENTS	9	5,768	10,032	5,629	10,000	9,748
TRADING AND INVESTMENT SECURITIES - Net	10	160,719	118,449	157,444	114,149	69,640
LOANS AND RECEIVABLES - Net	11	449,219	398,300	442,093	392,160	348,163
INVESTMENTS IN SUBSIDIARIES AND ASSOCIATES - Net	12	444	423	7,724	7,012	7,204
BANK PREMISES, FURNITURE, FIXTURES AND EQUIPMENT - Net	13	11,059	8,415	9,071	6,681	6,954
INVESTMENT PROPERTIES - Net	14	4,142	3,631	4,017	3,505	3,270
DEFERRED TAX ASSETS	26	2,140	2,094	1,888	1,874	1,771
OTHER RESOURCES - Net	15	10,608	9,022	9,523	8,631	7,720
<b>TOTAL RESOURCES</b>		<b>P 767,079</b>	<b>P 644,595</b>	<b>P 758,118</b>	<b>P 636,207</b>	<b>P 546,319</b>

See Notes to Financial Statements.

Statements  
of Profit  
or Loss

	Notes	GROUP		PARENT COMPANY		
		2019	2018	December 31, 2019	December 31, 2018 (As restated - see Note 34)	January 1, 2018 (As restated - see Note 34)
<b>LIABILITIES AND EQUITY</b>						
<b>DEPOSIT LIABILITIES</b>	17	<b>P 456,581</b>	P 423,399	<b>P 456,593</b>	P 423,529	P 389,130
<b>BILLS PAYABLE</b>	18	<b>101,606</b>	56,001	<b>93,938</b>	48,759	36,600
<b>BONDS PAYABLE</b>	19	<b>96,814</b>	53,090	<b>96,814</b>	53,090	28,060
<b>SUBORDINATED DEBT</b>	20	<b>-</b>	9,986	<b>-</b>	9,986	9,968
<b>ACCRUED INTEREST, TAXES AND OTHER EXPENSES</b>	21	<b>6,202</b>	5,277	<b>5,898</b>	5,061	4,024
<b>OTHER LIABILITIES</b>	22	<b>23,026</b>	15,672	<b>22,113</b>	14,707	11,608
Total Liabilities		<b>684,229</b>	563,425	<b>675,356</b>	555,132	479,390
<b>EQUITY</b>	23					
Attributable to:						
Parent Company's Shareholders		<b>82,831</b>	81,144	<b>82,762</b>	81,075	66,929
Non-controlling Interests		<b>19</b>	26	<b>-</b>	-	-
		<b>82,850</b>	81,170	<b>82,762</b>	81,075	66,929
<b>TOTAL LIABILITIES AND EQUITY</b>		<b>P 767,079</b>	P 644,595	<b>P 758,118</b>	P 636,207	P 546,319

See Notes to Financial Statements.

	Notes	GROUP			PARENT COMPANY		
		2019	2018	2017	2019	2018 (As restated - see Note 34)	2017 (As restated - see Note 34)
<b>INTEREST INCOME</b>							
Loans and receivables	11	<b>P 32,646</b>	P 27,037	P 21,956	<b>P 31,748</b>	P 26,258	
Trading and investment securities	10	<b>4,498</b>	3,403	2,430	<b>4,439</b>	3,367	
Others	9	<b>434</b>	493	378	<b>415</b>	419	
		<b>37,578</b>	30,933	24,764	<b>36,602</b>	30,044	
<b>INTEREST EXPENSE</b>							
Deposit liabilities	17	<b>8,626</b>	6,295	3,959	<b>8,598</b>	6,275	
Bills payable and other borrowings	18, 19, 20, 22, 24	<b>6,584</b>	4,149	2,784	<b>6,121</b>	3,815	
		<b>15,210</b>	10,444	6,743	<b>14,719</b>	10,090	
<b>NET INTEREST INCOME</b>		<b>22,368</b>	20,489	18,021	<b>21,883</b>	19,954	
<b>IMPAIRMENT LOSSES - Net</b>	16	<b>7,397</b>	1,899	2,155	<b>7,192</b>	1,782	
<b>NET INTEREST INCOME AFTER IMPAIRMENT LOSSES</b>		<b>14,971</b>	18,590	15,866	<b>14,691</b>	18,172	
<b>OTHER OPERATING INCOME</b>							
Trading and securities gains (losses) - net	10	<b>7,492</b>	-	900	<b>7,432</b>	(21)	
Service fees and commissions		<b>3,875</b>	3,323	3,138	<b>3,543</b>	3,112	
Share in net earnings of subsidiaries and associates	12	<b>21</b>	14	92	<b>473</b>	287	
Foreign exchange gains - net	19	<b>347</b>	843	798	<b>378</b>	1,013	
Trust fees	27	<b>323</b>	278	279	<b>323</b>	278	
Miscellaneous - net	25	<b>1,432</b>	1,548	1,893	<b>618</b>	825	
		<b>13,490</b>	6,006	7,100	<b>12,767</b>	5,494	
<b>TOTAL OPERATING INCOME (Forward)</b>		<b>P 28,461</b>	P 24,596	P 22,966	<b>P 27,458</b>	P 23,666	

See Notes to Financial Statements.

Notes	GROUP			PARENT COMPANY		
	2019	2018	2017	2019	2018 (As restated - see Note 34)	2017 (As restated - see Note 34)
<b>TOTAL OPERATING INCOME</b>	<b>P 28,461</b>	P 24,596	P 22,966	<b>P 27,458</b>	P 23,666	P 22,057
<b>OTHER OPERATING EXPENSES</b>						
Employee benefits	24 6,833	6,562	5,991	6,109	5,927	5,474
Taxes and licenses	14 3,103	2,238	1,821	2,966	2,100	1,703
Occupancy and equipment-related	28, 29 2,800	3,457	3,185	2,756	3,366	3,078
Depreciation and amortization	13, 14, 15 2,503	1,821	1,914	2,183	1,468	1,555
Miscellaneous	25 6,559	5,325	4,904	6,912	5,748	5,211
	<u>21,798</u>	<u>19,403</u>	<u>17,815</u>	<u>20,926</u>	<u>18,609</u>	<u>17,021</u>
<b>PROFIT BEFORE TAX</b>	<b>6,663</b>	5,193	5,151	<b>6,532</b>	5,057	5,036
<b>TAX EXPENSE</b>	26 <u>1,275</u>	<u>872</u>	<u>841</u>	<u>1,145</u>	<u>737</u>	<u>728</u>
<b>NET PROFIT</b>	<b><u>P 5,388</u></b>	<u>P 4,321</u>	<u>P 4,310</u>	<b><u>P 5,387</u></b>	<u>P 4,320</u>	<u>P 4,308</u>
<b>ATTRIBUTABLE TO:</b>						
<b>PARENT COMPANY'S SHAREHOLDERS</b>	<b>P 5,387</b>	P 4,320	P 4,308			
<b>NON-CONTROLLING INTERESTS</b>	<u>1</u>	<u>1</u>	<u>2</u>			
	<b><u>P 5,388</u></b>	<u>P 4,321</u>	<u>P 4,310</u>			
<b>Earnings Per Share</b>						
Basic and diluted	30 <u>P 2.78</u>	<u>P 2.62</u>	<u>P 3.08</u>			

See Notes to Financial Statements.

Notes	GROUP			PARENT COMPANY		
	2019	2018	2017	2019	2018 (As restated - see Note 34)	2017 (As restated - see Note 34)
<b>NET PROFIT</b>	<b>P 5,388</b>	P 4,321	P 4,310	<b>P 5,387</b>	P 4,320	P 4,308
<b>OTHER COMPREHENSIVE INCOME (LOSS)</b>						
<b>Items that will not be reclassified subsequently to profit or loss</b>						
Actuarial gains (losses) on defined benefit plan	24 ( 1,798 )	( 1,269 )	1,510	( 1,777 )	( 1,338 )	1,576
Fair value losses on equity securities at fair value through other comprehensive income (FVOCI)	10, 23 ( 586 )	( 1,018 )	( 156 )	( 837 )	( 628 )	( 269 )
Share in other comprehensive income (losses) of the subsidiaries and associates:						
Actuarial gains (losses) on defined benefit plan	12 -	6	4	( 21 )	75	( 62 )
Fair value gains (losses) on equity securities at FVOCI	12, 23 -	-	-	251	( 390 )	113
	<u>( 2,384 )</u>	<u>( 2,281 )</u>	<u>1,358</u>	<u>( 2,384 )</u>	<u>( 2,281 )</u>	<u>1,358</u>
<b>Items that will be reclassified subsequently to profit or loss</b>						
Fair value gains (losses) on debt securities at FVOCI	10, 23 ( 116 )	149	-	( 116 )	149	-
Translation adjustments on foreign operations	12 -	-	( 1 )	-	-	( 1 )
Reclassification of cumulative translation adjustment on dissolution of a foreign subsidiary	12, 23 -	( 32 )	-	-	( 32 )	-
	<u>( 116 )</u>	<u>117</u>	<u>( 1 )</u>	<u>( 116 )</u>	<u>117</u>	<u>( 1 )</u>
<b>Total Other Comprehensive Income (Loss)</b>	23 <u>( 2,500 )</u>	<u>( 2,164 )</u>	<u>1,357</u>	<u>( 2,500 )</u>	<u>( 2,164 )</u>	<u>1,357</u>
<b>TOTAL COMPREHENSIVE INCOME FOR THE YEAR</b>	<b><u>P 2,888</u></b>	<u>P 2,157</u>	<u>P 5,667</u>	<b><u>P 2,887</u></b>	<u>P 2,156</u>	<u>P 5,665</u>
<b>ATTRIBUTABLE TO:</b>						
<b>PARENT COMPANY'S SHAREHOLDERS</b>	<b>P 2,887</b>	P 2,156	P 5,665			
<b>NON-CONTROLLING INTERESTS</b>	<u>1</u>	<u>1</u>	<u>2</u>			
	<b><u>P 2,888</u></b>	<u>P 2,157</u>	<u>P 5,667</u>			

See Notes to Financial Statements.



Statements  
of Changes  
in Equity

## GROUP

Notes	ATTRIBUTABLE TO PARENT COMPANY'S SHAREHOLDERS										NON-CONTROLLING INTERESTS	TOTAL EQUITY	
	COMMON STOCK	PREFERRED STOCK	CAPITAL PAID IN EXCESS OF PAR	REVALUATION RESERVES	TREASURY SHARES	RESERVE FOR TRUST BUSINESS	OTHER RESERVES	GENERAL LOAN LOSS RESERVE	SURPLUS	TOTAL			
Balance at January 1, 2019													
As previously reported	P 22,509	P 3	P 42,138	P 266	( P 13,230)	P 454	( P 97)	P 2,594	P 26,507	P 81,144	P 26	P 81,170	
Effect of merger	-	-	430	-	( 489)	-	-	-	-	( 59)	-	( 59)	
Effect of adoption of Philippine Financial Reporting Standard (PFRS) 16	2	-	-	-	-	-	-	-	( 277)	( 277)	( 8)	( 285)	
As restated	<u>22,509</u>	<u>3</u>	<u>42,568</u>	<u>266</u>	<u>( 13,719)</u>	<u>454</u>	<u>( 97)</u>	<u>2,594</u>	<u>26,230</u>	<u>80,808</u>	<u>18</u>	<u>80,826</u>	
Transactions with owners -													
Cash dividends	23	-	-	-	-	-	-	-	( 864)	( 864)	-	( 864)	
Net profit for the year	-	-	-	-	-	-	-	-	5,387	5,387	1	5,388	
Other comprehensive loss	-	-	-	( 2,500)	-	-	-	-	( 2,500)	( 2,500)	-	( 2,500)	
General loan loss appropriation	23	-	-	-	-	-	-	538	( 538)	-	-	-	
Transfer of fair value loss on financial asset at fair value through other comprehensive income (FVOCI) to surplus	10, 23	-	-	-	41	-	-	-	( 41)	-	-	-	
Transfer from surplus to reserve for trust business	27	-	-	-	-	31	-	-	( 31)	-	-	-	
		<u>-</u>	<u>-</u>	<u>-</u>	<u>( 2,459)</u>	<u>-</u>	<u>31</u>	<u>538</u>	<u>4,777</u>	<u>2,887</u>	<u>1</u>	<u>2,888</u>	
Balance at December 31, 2019	<b>P 22,509</b>	<b>P 3</b>	<b>P 42,568</b>	<b>( P 2,193)</b>	<b>( P 13,719)</b>	<b>P 485</b>	<b>( P 97)</b>	<b>P 3,132</b>	<b>P 30,143</b>	<b>P 82,831</b>	<b>P 19</b>	<b>P 82,850</b>	
Balance at January 1, 2018													
As previously reported	P 17,152	P 3	P 31,524	P 1,974	( P 12,042)	P 436	( P 97)	P -	P 28,049	P 66,999	P 28	P 67,027	
Effect of merger	-	-	1,188	-	( 1,188)	-	-	-	-	-	-	-	
Effect of adoption of PFRS 9	2	-	-	456	-	-	-	2,227	( 4,614)	( 1,931)	( 3)	( 1,934)	
As restated	<u>17,152</u>	<u>3</u>	<u>32,712</u>	<u>2,430</u>	<u>( 13,230)</u>	<u>436</u>	<u>( 97)</u>	<u>2,227</u>	<u>23,435</u>	<u>65,068</u>	<u>25</u>	<u>65,093</u>	
Transactions with owners:													
Issuance of common stock	23	5,357	-	9,426	-	-	-	-	-	14,783	-	14,783	
Cash dividends	-	-	-	-	-	-	-	-	( 863)	( 863)	-	( 863)	
Total transactions with owners		<u>5,357</u>	<u>-</u>	<u>9,426</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>( 863)</u>	<u>13,920</u>	<u>-</u>	<u>13,920</u>	
Net profit for the year	-	-	-	-	-	-	-	-	4,320	4,320	1	4,321	
Other comprehensive loss	-	-	-	( 2,164)	-	-	-	-	( 2,164)	( 2,164)	-	( 2,164)	
General loan loss appropriation	23	-	-	-	-	-	-	367	( 367)	-	-	-	
Transfer from surplus to reserve for trust business	27	-	-	-	-	18	-	-	( 18)	-	-	-	
		<u>-</u>	<u>-</u>	<u>-</u>	<u>( 2,164)</u>	<u>18</u>	<u>-</u>	<u>367</u>	<u>3,935</u>	<u>2,156</u>	<u>1</u>	<u>2,157</u>	
Balance at December 31, 2018	<b>P 22,509</b>	<b>P 3</b>	<b>P 42,138</b>	<b>P 266</b>	<b>( P 13,230)</b>	<b>P 454</b>	<b>( P 97)</b>	<b>P 2,594</b>	<b>P 26,507</b>	<b>P 81,144</b>	<b>P 26</b>	<b>P 81,170</b>	
Balance at January 1, 2017													
As previously reported	P 13,999	P 3	P 22,635	P 621	P -	P 415	( P 97)	P -	P 24,531	P 62,107	P 26	P 62,133	
Effect of merger	3,153	-	8,889	-	( 12,042)	-	-	-	-	-	-	-	
As restated	<u>17,152</u>	<u>3</u>	<u>31,524</u>	<u>621</u>	<u>( 12,042)</u>	<u>415</u>	<u>( 97)</u>	<u>-</u>	<u>24,531</u>	<u>62,107</u>	<u>26</u>	<u>62,133</u>	
Transaction with owners -													
Cash dividends	23	-	-	-	-	-	-	-	( 773)	( 773)	-	( 773)	
Net profit for the year	-	-	-	-	-	-	-	-	4,308	4,308	2	4,310	
Other comprehensive income	23	-	-	-	1,357	-	-	-	-	1,357	-	1,357	
Transfer of fair value gains on financial assets at FVOCI to surplus	10, 23	-	-	-	( 4)	-	-	-	4	-	-	-	
Transfer from surplus to reserve for trust business	27	-	-	-	-	21	-	-	( 21)	-	-	-	
		<u>-</u>	<u>-</u>	<u>-</u>	<u>1,353</u>	<u>21</u>	<u>-</u>	<u>-</u>	<u>4,291</u>	<u>5,665</u>	<u>2</u>	<u>5,667</u>	
Balance at December 31, 2017	<b>P 17,152</b>	<b>P 3</b>	<b>P 31,524</b>	<b>P 1,974</b>	<b>( P 12,042)</b>	<b>P 436</b>	<b>( P 97)</b>	<b>P -</b>	<b>P 28,049</b>	<b>P 66,999</b>	<b>P 28</b>	<b>P 67,027</b>	

See Notes to Financial Statements.

Statements  
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in Equity

Notes	PARENT COMPANY								
	COMMON STOCK	PREFERRED STOCK	CAPITAL PAID IN EXCESS OF PAR	REVALUATION RESERVES	TREASURY SHARES	RESERVE FOR TRUST BUSINESS	GENERAL LOAN LOSS RESERVE	SURPLUS	TOTAL EQUITY
Balance at January 1, 2019									
As previously reported	P 22,509	P 3	P 42,138	P 266	( P 13,230)	P 454	P 2,587	P 26,348	P 81,075
Effect of adoption of Philippine Financial Reporting Standards (PFRS) 16	2 -	-	-	-	-	-	-	( 277)	( 277)
Effect of merger	-	-	430	-	( 489)	-	-	-	( 59)
As restated	<u>22,509</u>	<u>3</u>	<u>42,568</u>	<u>266</u>	<u>( 13,719)</u>	<u>454</u>	<u>2,587</u>	<u>26,071</u>	<u>80,739</u>
Transactions with owners -									
Cash dividends	23 -	-	-	-	-	-	-	( 864)	( 864)
Net profit for the year	-	-	-	-	-	-	-	5,387	5,387
Other comprehensive loss	-	-	-	( 2,500)	-	-	-	-	( 2,500)
General loan loss appropriation	23 -	-	-	-	-	-	543	( 543)	-
Transfer of fair value loss on financial asset at fair value through other comprehensive income (FVOCI) to surplus	10, 23 -	-	-	41	-	-	-	( 41)	-
Transfer from surplus to reserve for trust business	27 -	-	-	-	-	31	-	( 31)	-
	<u>-</u>	<u>-</u>	<u>-</u>	<u>( 2,459)</u>	<u>-</u>	<u>31</u>	<u>543</u>	<u>4,772</u>	<u>2,887</u>
Balance at December 31, 2019	<b>P 22,509</b>	<b>P 3</b>	<b>P 42,568</b>	<b>( P 2,193)</b>	<b>( P 13,719)</b>	<b>P 485</b>	<b>P 3,130</b>	<b>P 29,979</b>	<b>P 82,762</b>
Balance at January 1, 2018									
As previously reported	P 17,152	P 3	P 31,524	P 1,974	( P 12,042)	P 431	p -	P 27,887	P 66,929
Effect of merger	-	-	1,188	-	( 1,188)	-	-	-	-
Effect of adoption of PFRS 9	2 -	-	-	456	-	-	1,793	( 4,179)	( 1,930)
As restated	<u>17,152</u>	<u>3</u>	<u>32,712</u>	<u>2,430</u>	<u>( 13,230)</u>	<u>431</u>	<u>1,793</u>	<u>23,708</u>	<u>64,999</u>
Transactions with owners:									
Issuance of common shares during the year	23 5,357	-	9,426	-	-	-	-	-	14,783
Cash dividends	-	-	-	-	-	-	-	( 863)	( 863)
Total transactions with owners	<u>5,357</u>	<u>-</u>	<u>9,426</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>( 863)</u>	<u>13,920</u>
Net profit for the year	-	-	-	-	-	-	-	4,320	4,320
Other comprehensive loss	23 -	-	-	( 2,164)	-	-	-	-	( 2,164)
General loan loss appropriation	-	-	-	-	-	-	794	( 794)	-
Transfer from surplus to reserve for trust business	-	-	-	-	-	23	-	( 23)	-
	<u>-</u>	<u>-</u>	<u>-</u>	<u>( 2,164)</u>	<u>-</u>	<u>23</u>	<u>794</u>	<u>3,503</u>	<u>2,156</u>
Balance at December 31, 2018	<b>P 22,509</b>	<b>P 3</b>	<b>P 42,138</b>	<b>P 266</b>	<b>( P 13,230)</b>	<b>P 454</b>	<b>P 2,587</b>	<b>P 26,348</b>	<b>P 81,075</b>
Balance at January 1, 2017									
As previously reported	P 13,999	P 3	P 22,635	P 621	P -	P 378	P -	P 24,401	P 62,037
Effect of merger	3,153	-	8,889	-	( 12,042)	-	-	-	-
As restated	<u>17,152</u>	<u>3</u>	<u>31,524</u>	<u>621</u>	<u>( 12,042)</u>	<u>378</u>	<u>-</u>	<u>24,401</u>	<u>62,037</u>
Transaction with owners -									
Cash dividends	23 -	-	-	-	-	-	-	( 773)	( 773)
Net profit for the year	-	-	-	-	-	-	-	4,308	4,308
Other comprehensive income	23 -	-	-	1,357	-	-	-	-	1,357
Transfer of fair value gains on financial assets at FVOCI to surplus	10, 23 -	-	-	( 4)	-	-	-	4	-
Transfer from surplus to reserve for trust business	27 -	-	-	-	-	53	-	( 53)	-
	<u>-</u>	<u>-</u>	<u>-</u>	<u>1,353</u>	<u>-</u>	<u>53</u>	<u>-</u>	<u>4,259</u>	<u>5,665</u>
Balance at December 31, 2017	<b>P 17,152</b>	<b>P 3</b>	<b>P 31,524</b>	<b>P 1,974</b>	<b>( P 12,042)</b>	<b>P 431</b>	<b>P -</b>	<b>P 27,887</b>	<b>P 66,929</b>

See Notes to Financial Statements.



Statements  
of Cash  
Flows

	Notes	GROUP			PARENT COMPANY		
		2019	2018	2017	2019	2018 (As restated - see Note 34)	2017 (As restated - see Note 34)
<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>							
Profit before tax		P 6,663	P 5,193	P 5,151	P 6,532	P 5,057	P 5,036
Adjustments for:							
Interest received		41,050	29,528	24,455	41,050	28,000	23,782
Interest income	9, 10, 11	( 37,578 )	( 30,933 )	( 24,764 )	( 36,602 )	( 30,044 )	( 24,461 )
Interest expense	17, 18, 19, 20, 24	15,210	10,444	6,743	14,719	10,090	6,830
Interest paid		( 9,501 )	( 11,392 )	( 6,886 )	( 9,501 )	( 9,501 )	( 6,662 )
Gain on sale of financial assets at amortized cost -net	10	3,685	69	-	3,685	69	-
Impairment losses - net	16	7,397	1,899	2,155	7,192	1,782	1,958
Depreciation and amortization	13, 14, 15	2,503	1,821	1,914	2,183	1,468	1,555
Dividend income	25	( 304 )	( 189 )	( 234 )	( 95 )	( 187 )	( 196 )
Recoveries from written-off assets	25	179	206	187	179	206	187
Share in net earnings of subsidiaries and associates	12	( 21 )	( 14 )	( 92 )	( 473 )	( 287 )	( 833 )
Gains on assets sold - net	25	( 109 )	( 96 )	( 441 )	( 20 )	( 28 )	( 658 )
Operating profit before working capital changes		29,174	6,536	8,188	28,849	6,625	6,538
Decrease (increase) in financial assets at fair value through profit and loss		2,022	( 21 )	10,488	1,893	( 140 )	10,522
Decrease (increase) in financial assets at fair value through other comprehensive income		( 35,241 )	( 16,624 )	( 316 )	( 34,563 )	( 14,441 )	( 565 )
Increase in loans and receivables		( 61,164 )	( 34,325 )	( 50,359 )	( 51,147 )	( 41,930 )	( 120,649 )
Increase in investment properties		( 630 )	( 329 )	( 774 )	( 631 )	( 376 )	( 323 )
Decrease (increase) in other resources		( 4,081 )	1,646	1,852	( 3,505 )	2,534	8,563
Increase in deposit liabilities		33,182	34,987	35,335	33,064	34,399	128,965
Increase (decrease) in accrued interest, taxes and other expenses		( 4,499 )	( 1,037 )	( 593 )	( 4,096 )	( 242 )	( 31 )
Increase in other liabilities		10,846	74	1,911	3,105	4,437	4,496
Cash generated from (used in) operations		( 30,391 )	( 7,019 )	( 6,364 )	( 27,031 )	( 8,650 )	( 38,708 )
Income taxes paid		( 1,548 )	( 1,015 )	( 605 )	( 1,386 )	( 613 )	( 988 )
Net Cash From (Used in) Operating Activities		( 31,939 )	( 8,034 )	( 5,759 )	( 28,417 )	( 9,263 )	( 37,720 )
<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>							
Additional investments in securities at amortized cost		( 128,062 )	( 77,488 )	( 33,570 )	( 126,480 )	( 140,237 )	( 33,359 )
Proceeds from disposal and maturity of securities at amortized cost		116,025	47,755	25,296	111,217	111,059	18,553
Acquisitions of bank premises, furniture, fixtures, and equipment	13	( 2,245 )	( 1,214 )	( 1,521 )	( 1,717 )	( 980 )	( 3,364 )
Proceeds from disposals of bank premises, furniture, fixtures and equipment	13	908	401	203	831	227	559
Acquisitions of intangible assets	15	( 233 )	( 179 )	( 304 )	( 231 )	( 156 )	( 341 )
Cash dividends received	25	304	189	296	95	187	196
Net Cash Used in Investing Activities		( 13,303 )	( 30,536 )	( 9,600 )	( 16,285 )	( 29,900 )	( 17,756 )
<b>CASH FLOWS FROM FINANCING ACTIVITIES</b>							
Proceeds from availments of bills payable	18, 31	89,737	44,522	20,561	89,100	42,769	15,477
Issuance of bonds payable	19, 31	45,697	23,520	-	45,697	23,520	-
Payments of bills payable	18, 31	( 44,388 )	( 32,790 )	( 14,472 )	( 44,177 )	( 30,912 )	( 10,788 )
Redemption of subordinated debt	20	( 9,986 )	-	-	( 9,986 )	18	16
Dividends paid	23	( 864 )	( 863 )	( 773 )	( 864 )	( 863 )	( 773 )
Payment of lease liabilities	22	( 1,186 )	-	-	( 1,086 )	-	-
Issuance of common stock	23	-	14,783	-	-	14,783	-
Redemption of bonds payable	19, 31	-	-	( 13,687 )	-	-	( 13,687 )
Net Cash From (Used in) Financing Activities		79,010	49,172	( 8,371 )	78,684	49,315	( 9,755 )
<b>NET INCREASE (DECREASE) IN CASH AND CASH EQUIVALENTS (Forward)</b>		<b>P 33,768</b>	<b>P 10,602</b>	<b>( P 12,212 )</b>	<b>P 33,982</b>	<b>P 10,152</b>	<b>P 10,209</b>

See Notes to Financial Statements.

	Notes	GROUP			PARENT COMPANY		
		2019	2018	2017	2019	2018 (As restated - see Note 34)	2017 (As restated - see Note 34)
<b>NET INCREASE (DECREASE) IN CASH AND CASH EQUIVALENTS</b>		<b>P 33,768</b>	P 10,602	( P 12,212 )	<b>P 33,982</b>	P 10,152	P 10,209
<b>CASH AND CASH EQUIVALENTS AT BEGINNING OF YEAR</b>							
Cash and other cash items	9	17,392	14,693	15,176	17,321	14,861	11,000
Due from Bangko Sentral ng Pilipinas	9	56,495	58,801	66,520	55,059	57,519	50,871
Due from other banks	9	20,342	19,818	25,293	19,815	19,469	24,109
Loans arising from reverse repurchase agreement	9	10,032	9,831	7,889	10,000	9,748	4,931
Interbank loans receivable	9, 11	9,522	38	515	9,592	38	515
		<b>113,783</b>	103,181	115,393	<b>111,787</b>	101,635	91,426
<b>CASH AND CASH EQUIVALENTS AT END OF YEAR</b>							
Cash and other cash items	9	16,907	17,392	14,693	16,808	17,321	14,861
Due from Bangko Sentral ng Pilipinas	9	87,255	56,495	58,801	85,453	55,059	57,519
Due from other banks	9	18,818	20,342	19,818	18,468	19,815	19,469
Loans arising from reverse repurchase agreement	9	5,768	10,032	9,831	5,629	10,000	9,748
Interbank loans receivable	9, 11	18,803	9,522	38	19,411	9,592	38
		<b>P 147,551</b>	P 113,783	P 103,181	<b>P 145,769</b>	P 111,787	P 101,635

*See Notes to Financial Statements.*



## 1. CORPORATE MATTERS

### 1.1 Incorporation and Operations

Rizal Commercial Banking Corporation (the Parent Company, the Bank or RCBC), a universal bank engaged in all aspects of banking, was originally incorporated on September 23, 1960. The Bank renewed its corporate existence on December 10, 2009. It provides products and services related to traditional loans and deposits, trade finance, domestic and foreign fund transfers or remittance, cash management, treasury, and trust and custodianship services. Under relevant authority granted by the Bangko Sentral ng Pilipinas (BSP), the Bank is also licensed to deal in different types of derivatives products such as, but not limited, to foreign currency forwards, interest rate swaps and cross currency swaps. The Parent Company and its subsidiaries (together hereinafter referred to as the Group) are engaged in all aspects of traditional banking, investment banking, retail financing (credit cards, auto loans, mortgage/housing and microfinance loans), remittance, leasing and stock brokering.

As a banking institution, the Group's operations are regulated and supervised by the BSP. As such, the Group is required to comply with banking rules and regulations such as those relating to maintenance of reserve requirements on deposit liabilities and deposit substitutes and those relating to the adoption and use of safe and sound banking practices, among others, as promulgated by the BSP. The Group's activities are subject to the provisions of Republic Act (RA) No. 8791, the *General Banking Law of 2000*, and other related banking laws.

The Parent Company's common shares are listed in the Philippine Stock Exchange (PSE).

The Group and the Parent Company's banking network within and outside the Philippines as of December 31 follows:

	Group		Parent Company	
	2019	2018	2019	2018
Automated teller machines (ATMs)	1,530	1,593	1,530	1,593
Branches	496	497	479	479
Extension offices	11	12	7	7

RCBC is a 41.66%-owned subsidiary of Pan Malayan Management and Investment Corporation (PMMIC), a company incorporated and domiciled in the Philippines. PMMIC is the holding company of the flagship institutions of the Yuchengco Group of Companies (YGC), with registered business address at 48<sup>th</sup> Floor, Yuchengco Tower, RCBC Plaza, 6819 Ayala Avenue cor. Sen. Gil Puyat Avenue, Makati City. As of December 31, 2019, Cathay Life Insurance Corporation (Cathay) also owns 23.35% interest in RCBC.

The Parent Company's registered address, which is also its principal office, is at Yuchengco Tower, RCBC Plaza, 6819 Ayala Avenue cor. Sen. Gil Puyat Avenue, Makati City.

### 1.2 Subsidiaries and Associates

The Parent Company holds ownership interests in the following subsidiaries and associates at the end of 2019 and 2018:

Subsidiaries	Line of Business	Explanatory Notes	Effective Percentage of Ownership	
			2019	2018
Subsidiaries:				
RCBC Forex Brokers Corporation (RCBC Forex)	Foreign exchange dealing		100.00	100.00
RCBC Telemoney Europe (RCBC Telemoney)	Remittance		100.00	100.00
RCBC International Finance Limited (RCBC IFL)	Remittance		100.00	100.00
RCBC Investment Ltd.	Remittance	(a)	100.00	100.00
RCBC Capital Corporation (RCBC Capital)	Investment house		99.96	99.96
RCBC Securities, Inc. (RSI)	Securities brokerage and dealing	(b)	99.96	99.96
RCBC Bankard Services Corporation (RBSC)	Credit card management	(b)	99.96	99.96
RCBC-JPL Holding Company, Inc. (RCBC JPL)	Property holding		99.41	99.41
Rizal Microbank, Inc.	Thrift banking and microfinance		98.03	98.03
RCBC Leasing and Finance Corporation (RCBC LFC)	Financial leasing	(c)	99.67	99.31
RCBC Rental Corporation (RRC)	Property leasing	(c), (d)	99.67	99.31
Special Purpose Companies (SPCs):	Real estate buying and selling	(e)		
Cajel Realty Corporation (Cajel)			100.00	100.00
Niyog Property Holdings, Inc. (NPHI)			100.00	100.00
Crescent Park Property and Development Corporation				
Best Value Property and Development Corporation (Best Value)			-	100.00
(Crescent Park)			-	100.00
Crestview Properties Development Corporation (Crestview)			-	100.00
Eight Hills Property and Development Corporation (Eight Hills)			-	100.00
Gold Place Properties Development Corporation (Gold Place)			-	100.00
Goldpath Properties Development Corporation (Goldpath)			-	100.00
Greatwings Properties Development Corporation (Greatwings)			-	100.00
Lifeway Property and Development Corporation (Lifeway)			-	100.00
Niceview Property and Development Corporation (Niceview)			-	100.00
Princeway Properties Development Corporation (Princeway)			-	100.00
Top Place Properties Development Corporation (Top Place)			-	100.00

<u>Associates</u>	<u>Line of Business</u>	<u>Effective Percentage of Ownership</u>
Associates:		
YGC Corporate Services, Inc. (YCS)	Support services for YGC	40.00
Luisita Industrial Park Co. (LIPC)	Real estate buying, developing, selling and rental	35.00
Honda Cars Phils., Inc. (HCPI)	Sale of motor vehicles	12.88

Except for RCBC Telemoney (Italy), RCBC IFL (Hongkong) and RCBC Investment Ltd. (Hongkong), all other subsidiaries and associates are incorporated and conducting their businesses in the Philippines. RCBC Telemoney was operational only until March 1, 2016. RCBC North America, Inc., a former wholly owned subsidiary, was dissolved in May 2018 after it has ceased its operations in March 2014.

Explanatory Notes:

- (a) A wholly-owned subsidiary of RCBC IFL.
- (b) Wholly-owned subsidiaries of RCBC Capital.
- (c) The increase in ownership interest in RCBC LFC resulted from the issuance of shares of stock to the Parent Company after the former has secured in 2018 the Securities and Exchange Commission (SEC) approval of its application for increase in authorized capital stock from which the subscriptions were made (see Note 12.1).
- (d) A wholly-owned subsidiary of RCBC LFC.
- (e) In 2019, the SPCs, except for NPHI and Cajel, were liquidated pursuant to BSP recommendation and upon receipt of necessary regulatory clearance (see Note 15.3).

### 1.3 Merger with RCBC Savings Bank, Inc. (RSB)

The Bank, together with RSB, a wholly-owned subsidiary, executed a Plan of Merger on November 27, 2018, which was previously approved by all members of the Bank's Board of Directors (BOD) and by all the stockholders of the Bank on February 26, 2019. The same was filed with the SEC and was subsequently approved on July 22, 2019.

Upon issuance by the SEC of the Certificate of Filing of the Articles and Plan of Merger, RSB was merged into the Bank, which is the surviving corporation of the merger. As such, the financial information in the Parent Company's financial statements are restated for the periods prior to the combination of the Parent Company and RSB to reflect the combination as if it had occurred at the beginning of the earliest period presented in the financial statements, regardless of the actual date of the combination.

Upon the effective merger date, RCBC, as the surviving corporation, continues its existence as a corporation and conducts its business under its existing name. Issued and outstanding common shares of RSB was cancelled and exchanged with RCBC's shares. The Bank issued a total of 315,287,248 shares to the shareholders of RSB, in exchange for their respective shares, based on a share exchange ratio agreed by both parties (see Notes 23 and 34).

### 1.4 Approval of Financial Statements

The consolidated financial statements of RCBC and subsidiaries and the separate financial statements of RCBC as of and for the year ended December 31, 2019 (including the comparative financial statements as of December 31, 2018 and for the years ended December 31, 2018 and 2017) were approved and authorized for issue by the BOD of the Parent Company on February 24, 2020.

## 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

The significant accounting policies that have been used in the preparation of these financial statements are summarized below. The accounting policies have been consistently applied to all the years presented, except when otherwise indicated.

### 2.1 Basis of Preparation of Financial Statements

#### (a) Statement of Compliance with Philippine Financial Reporting Standards

The consolidated financial statements of the Group and the separate financial statements of the Parent Company have been prepared in accordance with Philippine Financial Reporting Standards (PFRS). PFRS are adopted by the Financial Reporting Standards Council (FRSC) from the pronouncements issued by the International Accounting Standards Board (IASB), and approved by Philippine Board of Accountancy.

These financial statements have been prepared using the measurement bases specified by PFRS for each type of resource, liability, income and expense. The measurement bases are more fully described in the accounting policies that follow.

#### (b) Presentation of Financial Statements

The financial statements are presented in accordance with Philippine Accounting Standards (PAS) 1, *Presentation of Financial Statements*. The Group presents all items of income and expenses in two statements: a "statement of profit or loss" and a "statement of comprehensive income".

The Group presents a third statement of financial position as of the beginning of the preceding period when it applies an accounting policy retrospectively, or makes a retrospective restatement or reclassification of items that have a material effect on the information in the statement of financial position at the beginning of the preceding period. The related notes to the third statement of financial position are not required to be disclosed.

In 2019, the Parent Company made retrospective changes in the comparative separate financial statements for the year ended December 31, 2018 and in the corresponding figures as of January 1, 2018, to reflect the merger with RSB accounted for as common control business combination using pooling of interest method [see Notes 2.3 (a)(ii) and 34]. Accordingly, the Parent Company presents a third statement of financial position as of January 1, 2018 without the related notes, except for the disclosures required under PAS 8, *Accounting Policies, Changes in Accounting Estimates and Errors*.

The effect of this restatement in the comparative financial statements of the Parent Company for December 31, 2018 and the corresponding figures as of January 1, 2018 on the affected accounts are presented in Note 34. In 2018, the Group and the Parent Company adopted PFRS 9, *Financial Instruments*, which was applied retrospectively. The impact of the adoption of PFRS 9 resulted to an increase (decrease) in the balances as of January 1, 2018 of Revaluation Reserves, General Loan Loss Reserve, Surplus, Non-controlling Interests and Total Equity amounting to P456, P2,227, (P4,614), (P3), and (P1,934), respectively, for the Group, and of Revaluation Reserves, General Loan loss Reserve, Surplus and Total Equity amounting to P456, P1,793, (P4,179) and (P1,930), respectively, for the Parent Company.



*(c) Functional and Presentation Currency*

These financial statements are presented in Philippine pesos, the Group's functional and presentation currency (see Note 2.17). All amounts are in millions, except share and per share data or when otherwise indicated.

Items included in the financial statements of the Group are measured using its functional currency. Functional currency is the currency of the primary economic environment in which the Group operates.

**2.2 Adoption of New and Amended PFRS***(a) Effective in 2019 that are Relevant to the Group*

The Group adopted for the first time the following new PFRS, interpretation, amendments and improvements to PFRS, which are mandatorily effective for annual periods beginning on or after January 1, 2019:

PAS 19 (Amendments)	:	Employee Benefits – Plan Amendment Curtailment or Settlement
PAS 28 (Amendments)	:	Investment in Associates and Joint Ventures – Long-term Interests in Associates and Joint Ventures
PFRS 9 (Amendments)	:	Financial Instruments – Prepayment Features With Negative Compensation
PFRS 16	:	Leases
International Financial Reporting Interpretations Committee (IFRIC) 23	:	Uncertainty over Income Treatments
Annual Improvements to PFRS (2015 - 2017 Cycle)		
PAS 12 (Amendments)	:	Income Taxes – Tax Consequences of Dividends
PAS 23 (Amendments)	:	Borrowing Costs – Eligibility for Capitalization
PFRS 3 (Amendments) and PFRS 11 (Amendments)	:	Business Combinations and Joint Arrangements – Remeasurement of Previously Held Interest in a Joint Operation

Discussed below are the relevant information about these pronouncements.

- (i) PAS 19 (Amendments), *Employee Benefits – Plan Amendment, Curtailment or Settlement*. The amendments clarify that past service cost and gain or loss on settlement is calculated by measuring the net defined benefit liability or asset using updated actuarial assumptions and comparing the benefits offered and plan assets before and after the plan amendment, curtailment or settlement but ignoring the effect of the asset ceiling that may arise when the defined benefit plan is in a surplus position. Further, the amendments now require that if an entity remeasures its net defined benefit liability or asset after a plan amendment, curtailment or settlement, it should also use updated actuarial assumptions to determine current service cost and net interest for the remainder of the annual reporting period after the change to the plan. The application of these amendments had no significant impact on the Group's financial statements.

- (ii) PAS 28 (Amendments), *Investment in Associates and Joint Ventures – Long-term Interest in Associates and Joint Ventures*. The amendments clarify that the scope exclusion in PFRS 9 applies only to ownership interests accounted for using the equity method. Thus, the amendments further clarify that long-term interests in an associate or joint venture – to which the equity method is not applied – must be accounted for under PFRS 9, which shall also include long-term interests that, in substance, form part of the entity's net investment in an associate or joint venture. The application of these amendments had no significant impact on the Group's financial statements.

- (iii) PFRS 9 (Amendments), *Financial Instruments – Prepayment Features with Negative Compensation*. The amendments clarify that prepayment features with negative compensation attached to financial assets may still qualify under the “solely payments of principal and interests” (SPPI) test. As such, the financial assets containing prepayment features with negative compensation may still be classified at amortized cost or at fair value through other comprehensive income (FVOCI). The application of these amendments had no significant impact on the Group's financial statements.

- (iv) PFRS 16, *Leases*. The new standard replaced PAS 17, *Leases*, and its related interpretation IFRIC 4, *Determining Whether an Arrangement Contains a Lease*, Standard Interpretations Committee (SIC) 15, *Operating Leases – Incentives* and SIC 27, *Evaluating the Substance of Transactions Involving the Legal Form of a Lease*. For lessees, it requires an entity to account for leases “on-balance sheet” by recognizing a “right-of-use” asset and lease liability arising from contract that is, or contains, a lease.

For lessors, the definitions of the type of lease (i.e., finance and operating leases) and the supporting indicators of a finance lease are substantially the same with the provisions under PAS 17. In addition, basic accounting mechanics are also similar but with some different or more explicit guidance related to variable payments, sub-leases, lease modifications, the treatment of initial direct costs and lessor disclosures.

The Group has adopted PFRS 16 using the modified retrospective approach as allowed under the transitional provisions of the standard. The adoption of the standard has resulted in adjustments to the amounts recognized in the financial statements as at January 1, 2019, with the cumulative effect recognized in equity as an adjustment to the opening balance of Surplus for the current period. Accordingly, comparative information was not restated.

The new accounting policies of the Group as a lessee are disclosed in Note 2.16(a), while the accounting policies of the Group as a lessor, as described in Note 2.16(b), were not significantly affected.

Discussed below are the relevant information arising from the Group's adoption of PFRS 16 and how the related accounts are measured and presented on the Group's financial statements as at January 1, 2019.

- a. For contracts in place at the date of initial application, the Group has elected to apply the definition of a lease from PAS 17 and IFRIC 4 and has not applied PFRS 16 to arrangements that were previously not identified as leases under PAS 17 and IFRIC 4.

- b. The Group recognized lease liabilities in relation to leases which had previously been classified as operating leases under PAS 17. These liabilities were measured at the present value of the remaining lease payments, discounted using the Group's incremental borrowing rate as of January 1, 2019. The Group's weighted average incremental borrowing rate applied to the lease liabilities on January 1, 2019 ranged from 6.0% to 7.06%.
- c. The Group has elected not to include initial direct costs in the measurement of right-of-use assets at the date of initial application. The Group also elected to measure the right-of-use assets at its carrying amount as if the new standard had been applied since commencement date, but discounted using the Group's incremental borrowing rate at the date of application. The Right-of-use assets are presented as part of Bank Premises, Furniture, Fixtures and Equipment in the 2019 statement of financial position (see Note 13)
- d. For leases previously accounted for as operating leases with a remaining lease term of less than 12 months and for leases of low-value assets, the Group has applied the optional exemptions to not recognize right-of-use assets but to account for the lease expense on a straight-line basis over the remaining lease term.
- e. The Group has also used the following practical expedients, apart from those already mentioned above, as permitted by the standard:
- application of a single discount rate to a portfolio of leases with reasonably similar characteristics; and
  - reliance on its historical assessments on whether leases are onerous as an alternative to performing an impairment review on right-of-use assets. As at January 1, 2019, the Group has no onerous contracts.

The following table shows the effects of the adoption of PFRS 16 in the carrying amounts and presentation of certain accounts in the statement of financial position as at January 1, 2019.

	Group		
	Carrying Amount (PAS 17) December 31, 2018	Adjustments	Carrying Amount (PFRS 16) January 1, 2019
<b>Assets</b>			
Bank premises, furniture, fixtures and equipment – Net	8,415	3,106	11,521
Deferred tax assets – Net	2,094	( 11)	2,083
	<b>P 3,095</b>		
<b>Liabilities</b>			
Accrued interest, taxes and other expenses	5,277	( 74)	5,203
Other liabilities:			
Lease liability	-	3,571	3,571
Deferred charges	125	( 125)	-
	<b>3,372</b>		
<b>Impact on equity</b>	<b>(P 277)</b>		

	Parent Company (As restated – see Note 34)		
	Carrying Amount (PAS 17) December 31, 2018	Adjustments	Carrying Amount (PFRS 16) January 1, 2019
<b>Assets</b>			
Investment in subsidiaries and associates – Net	P 7,012	(P 14)	P 6,998
Bank premises, furniture, fixtures and equipment – Net	6,681	2,972	9,653
Deferred tax assets – Net	1,874	( 37)	1,837
	<b>P 2,921</b>		
<b>Liabilities</b>			
Accrued interest, taxes and other expenses	5,061	( 59)	5,002
Other liabilities:			
Lease liability	-	3,382	3,382
Deferred charges	125	( 125)	-
	<b>3,198</b>		
<b>Impact on equity</b>	<b>(P 277)</b>		

A reconciliation of the opening lease liabilities recognized at January 1, 2019 and the total operating lease commitments determined under PAS 17 at December 31, 2018 is shown below.

	Notes	Group	Parent Company
Operating lease commitments, December 31, 2018 (PAS 17)	29.8	P 4,564	P 4,349
Recognition exemptions:			
Leases of low value assets and leases with remaining term of less than 12 months	2.2(a)(iv)(d)	( 147)	( 146)
Operating lease liabilities before discounting		4,417	4,203
Discount using incremental borrowing rate	2.2(a)(iv)(b)	( 846)	( 821)
Lease liabilities, January 1, 2019 (PFRS 16)		<b>P 3,571</b>	<b>P 3,382</b>

- (v) IFRIC 23, *Uncertainty over Income Tax Treatments*. This interpretation provides clarification on the determination of taxable profit, tax bases, unused tax losses, unused tax credits, and tax rates when there is uncertainty over income tax treatments. The core principle of the interpretation requires the Group to consider the probability of the tax treatment being accepted by the taxation authority. When it is probable that the tax treatment will be accepted, the determination of the taxable profit, tax bases, unused tax losses, unused tax credits, and tax rates shall be on the basis of the accepted tax treatment. Otherwise, the Group has to use the most likely amount or the expected value, depending on the surrounding circumstances, in determining the tax accounts identified immediately above. The interpretation has no significant impact on the Group's financial statements.

- (vi) Annual Improvements to PFRS 2015-2017 Cycle. Among the improvements, the following amendments, which are effective from January 1, 2019, are relevant to the Group but had no significant impact on the Group's financial statements:
- PAS 12 (Amendments), *Income Taxes – Tax Consequences of Dividends*. The amendments clarify that an entity should recognize the income tax consequence of dividend payments in profit or loss, other comprehensive income or equity according to where the entity originally recognized the transactions that generated the distributable profits.
  - PAS 23 (Amendments), *Borrowing Costs – Eligibility for Capitalization*. The amendments clarify that if any specific borrowing remains outstanding after the related qualifying asset is ready for its intended use or sale, such borrowing is treated as part of the entity's general borrowings when calculating the capitalization rate.
  - PFRS 3 (Amendments), *Business Combinations* and PFRS 11 (Amendments), *Joint Arrangements – Remeasurement of Previously Held Interests in a Joint Operation*. The amendments clarify that previously held interest in a joint operation shall be remeasured when the Group obtains control of the business. On the other hand, previously held interests in a joint operation shall not be remeasured when the Group obtains joint control of the business.

(b) *Effective Subsequent to 2019 but Not Adopted Early*

There are amendments to existing standards effective for annual periods subsequent to 2019, which are adopted by the FRSC. Management will adopt the following relevant pronouncements in accordance with their transitional provisions; and, unless otherwise stated, none of these are expected to have significant impact on the Group's financial statements:

- (i) PAS 1 (Amendments), *Presentation of Financial Statements* and PAS 8 (Amendments), *Accounting Policies, Changes in Accounting Estimates and Errors – Definition of Material* (effective from January 1, 2020). The amendments provide a clearer definition of 'material' in PAS 1 by including the concept of 'obscuring' material information with immaterial information as part of the new definition, and clarifying the assessment threshold (i.e., misstatement of information is material if it could reasonably be expected to influence decisions made by primary users, which consider the characteristic of those users as well as the entity's own circumstances). The definition of material in PAS 8 has been accordingly replaced by reference to the new definition in PAS 1. In addition, amendment has also been made in other standards that contain definition of material or refer to the term 'material' to ensure consistency.
- (ii) Revised Conceptual Framework for Financial Reporting (effective from January 1, 2020). The revised conceptual framework will be used in standard-setting decisions with immediate effect. Key changes include (a) increasing the prominence of stewardship in the objective of financial reporting, (b) reinstating prudence as a component of neutrality, (c) defining a reporting entity, which may be a legal entity, or a portion of an entity, (d) revising the definitions of an asset and a liability, (e) removing the probability threshold for recognition and adding guidance on derecognition, (f) adding guidance on different measurement basis, and, (g) stating that profit or loss is the primary performance indicator and that, in principle, income and expenses in other comprehensive income should be recycled where this enhances the relevance or faithful representation of the financial statements.

No changes will be made to any of the current accounting standards. However, entities that rely on the framework in determining their accounting policies for transactions, events or conditions that are not otherwise dealt with under the accounting standards will need to apply the revised framework from January 1, 2020. These entities will need to consider whether their accounting policies are still appropriate under the revised framework.

- (iii) PFRS 3 (Amendments), *Business Combinations – Definition of Business* (effective January 1, 2020). The amendments clarify the definition of a business by providing a new framework for determining whether transactions should be accounted for as acquisitions (or disposals) of assets or businesses. The amendments also clarify the minimum requirements to be a business, remove the assessment of a market participant's ability to replace missing elements, and narrow the definition of outputs.
- (iv) PFRS 10 (Amendments), *Consolidated Financial Statements, and PAS 28 (Amendments) – Sale or Contribution of Assets between an Investor and its Associate or Joint Venture* (effective date deferred indefinitely). The amendments to PFRS 10 require full recognition in the investor's financial statements of gains or losses arising on the sale or contribution of assets that constitute a business as defined in PFRS 3 between an investor and its associate or joint venture. Accordingly, the partial recognition of gains or losses (i.e., to the extent of the unrelated investor's interests in an associate or joint venture) only applies to those sale or contribution of assets that do not constitute a business. Corresponding amendments have been made to PAS 28 to reflect these changes. In addition, PAS 28 has been amended to clarify that when determining whether assets that are sold or contributed constitute a business, an entity shall consider whether the sale or contribution of those assets is part of multiple arrangements that should be accounted for as a single transaction.

### 2.3 *Basis of Consolidation and Accounting for Investments in Subsidiaries and Associates in the Separate Financial Statements*

The Group's consolidated financial statements comprise the accounts of the Parent Company and its subsidiaries as enumerated in Note 1.2, after the elimination of material intercompany transactions. All intercompany resources and liabilities, equity, income, expenses and cash flows relating to transactions with subsidiaries are eliminated in full. Unrealized profits and losses from intercompany transactions that are recognized in assets are also eliminated in full. Intercompany losses that indicate impairment are recognized in the consolidated financial statements.

The financial statements of the subsidiaries are prepared in the same reporting period as the Parent Company, using consistent accounting policies.

The Parent Company accounts for its investments in subsidiaries, associates, interests in jointly controlled operations and non-controlling interests as follows:

(a) *Investments in Subsidiaries*

Subsidiaries are entities (including structured entities) over which the Group has control. The Group controls an entity when it has the power over the entity; it is exposed, or has rights to, variable returns from its involvement with the entity; and, it has the ability to affect those returns through its power over the entity. Subsidiaries are consolidated from the date the Group obtains control.



The Parent Company's investments in subsidiaries are initially recognized at cost and subsequently accounted for in its separate financial statements using the equity method. Under the equity method, all subsequent changes to the ownership interest in the equity of the subsidiaries are recognized in the Parent Company's carrying amount of the investments. Changes resulting from the profit or loss generated by the subsidiaries are credited or charged against the Share in Net Earnings of Subsidiaries and Associates account in the statements of profit or loss.

These changes include subsequent depreciation, amortization, impairment and fair value adjustments of assets and liabilities. Dividends received are accounted for as reduction in the carrying value of the investment.

Changes resulting from items of other comprehensive income of the subsidiaries or items that have been directly recognized in the subsidiaries' equity are recognized in other comprehensive income or equity, respectively, of the Parent Company.

However, when the Parent Company's share in losses of subsidiaries equals or exceeds its interest in the subsidiary, including any other unsecured receivables, the Parent Company does not recognize further losses, unless it has incurred obligations or made payments on behalf of the subsidiary. If the subsidiary subsequently reports profits, the Group resumes recognizing its share of those profits only after its share of the profits exceeds the accumulated share of losses that has not been recognized previously.

Unrealized gains on transactions between the Parent Company and its subsidiaries are eliminated to the extent of the Parent Company's interest in the subsidiaries. Unrealized losses are also eliminated unless the transaction provides evidence of an impairment of the assets that were transferred. Where necessary, accounting policies of subsidiaries are changed to ensure consistency with the policies adopted by the Parent Company.

The Parent Company reassesses whether or not it controls an entity if facts and circumstances indicate that there are changes to one or more of the three elements of controls. Accordingly, entities are deconsolidated from the date that control ceases.

Acquired subsidiaries are subject to either of the following relevant policies:

- (i) *Purchase method* – involves the revaluation at fair value of all identifiable assets and liabilities, including contingent liabilities of a subsidiary, at the acquisition date, regardless of whether or not they were recorded in the financial statements of a subsidiary prior to acquisition. On initial recognition, the assets and liabilities of a subsidiary are included in the consolidated statement of financial position at their revalued amounts, which are also used as the bases for subsequent measurement in accordance with the Group's accounting policies.

Goodwill represents the excess of acquisition cost over the fair value of the Group's share of the identifiable net assets of the acquired subsidiary at the date of acquisition. On the other hand, negative goodwill represents the excess of the Group's share in the fair value of identifiable net assets of the subsidiary at the date of acquisition over acquisition cost and is recognized directly in profit or loss.

- (ii) *Pooling of interest method* – is applicable for business combinations involving entities under common control. On initial recognition, the assets and liabilities of a subsidiary are included in the consolidated statement of financial position at their book values. Adjustments, if any, are recorded to achieve uniform accounting policies. The combining entities' results and financial positions are presented in the consolidated financial statements as if they had always been combined.

No goodwill or negative goodwill is recognized. Any difference between the cost of the investment and the subsidiary's identifiable net assets is recognized on consolidation in Capital Paid in Excess of Par account under Equity.

- (b) *Investments in Associates*

Associates are those entities over which the Group is able to exert significant influence but which are neither subsidiaries nor interests in joint venture. In the consolidated financial statements, investments in associates are initially recognized at cost and subsequently accounted for using the equity method. Under the equity method, the Group recognizes in profit or loss its share in the net earnings or losses of the associates. The cost of the investment is increased or decreased by the Group's equity in net earnings or losses of the associates since the date of acquisition. Dividends received are accounted for as reduction in the carrying value of the investment.

Acquired investments in associates are subject to purchase method of accounting as described in Note 2.3(a)(i). However, any goodwill that represents the excess of identifiable net assets of the acquiree at the date of acquisition or fair value adjustment attributable to the Group's share in the associate is included in the amount recognized as investments in associates. All subsequent changes to the ownership of interest in the equity of the associate are recognized in the Group's carrying amount of the investment. Changes resulting from the profit or loss generated by the associate are credited against Share in Net Earnings of Subsidiaries and Associates account in the statements of profits or loss. These changes include subsequent depreciation, amortization, impairment, and fair value adjustments of assets and liabilities.

Changes resulting from items of other comprehensive income of the associate or items that have been directly recognized in the associate's equity are recognized in other comprehensive income or equity, respectively, of the Group. However, when the Group's share in losses of an associate equals or exceeds its interest in the associate, including any other unsecured receivables, the Group does not recognize further losses, unless it has incurred obligations or made payments on behalf of the associate. If the associate subsequently reports profits, the Group resumes recognizing its share of those profits only after its share of the profits exceeds the accumulated share of losses that has not been recognized previously.

Unrealized gains on transactions between the Group and its associates are eliminated to the extent of the Group's interest in the associates. Unrealized losses are also eliminated unless the transaction provides evidence of an impairment of the assets that were transferred. Where necessary, accounting policies of associates are changed to ensure consistency with the policies adopted by the Group.

The Group reassesses whether or not an entity qualifies as an associate in the occurrence of changes to facts and circumstances surrounding its ability to exert significant influence.

*(c) Interest in Jointly Controlled Operations*

For interests in jointly controlled operations, the Group recognizes in its financial statements the assets that it controls, the liabilities and the expenses that it incurs and its share in the income from the sale of goods or services by the joint venture. The amounts of these related accounts are presented as part of the regular asset and liability accounts and income and expense accounts of the Group.

No adjustment or other consolidation procedures are required for the assets, liabilities, income and expenses of the joint venture that are recognized in the separate financial statements of the venturers.

*(d) Transactions with Non-controlling Interests*

Non-controlling interests (NCI) represent the portion of the net assets and profit or loss not attributable to the Group. The Group applies a policy of treating transactions with NCI as transactions with parties external to the Group. Disposals to NCI result in gains and losses for the Group that are recorded in profit or loss. Purchases of equity shares from NCI may result in goodwill, being the difference between any consideration paid and the relevant share acquired in the carrying value of the net assets of a subsidiary.

In the consolidated financial statements, the NCI component is shown as part of the Equity account in

In the Parent Company's financial statements, impairment loss is provided when there is objective evidence that the investments in subsidiaries and associates will not be recovered (see Note 2.18).

**2.4 Segment Reporting**

A business segment is a group of assets and operations engaged in providing products or services that are subject to risks and returns that are different from those of other business segments. A geographical segment is a segment engaged in providing products or services within a particular economic environment that is subject to risks and returns that are different from those of segments operating in other economic environments.

The Group's operations are structured according to the nature of the services provided (primary segment) and different geographical markets served (secondary segment). Financial information on business segments is presented in Note 8.

**2.5 Financial Instruments**

Financial assets and financial liabilities are recognized when the Group becomes a party to the contractual provisions of the financial instrument. For purposes of classifying financial instrument, an instrument is considered as an equity instrument if it is non-derivative and meets the definition of equity for the issuer in accordance with the criteria under PAS 32, *Financial Instruments: Presentation*. All other non-derivative financial instruments are treated as debt instruments.

Purchases or sales of financial assets that require delivery of assets within the time frame established by regulation or convention in the marketplace are recognized on the settlement date. Deposits, amounts due to banks and customers, and loans are recognized when cash is received by the Group or advanced to the borrowers.

At initial recognition, the Group measures a financial asset or financial liability at its fair value plus or minus, in the case of a financial asset or financial liability not at Fair Value Through Profit or Loss (FVTPL), transaction costs such as fees and commissions that are incremental or directly attributable to the acquisition or issue of the financial asset or financial liability. Transaction costs of financial assets and financial liabilities carried at FVTPL are expensed in profit or loss.

*(a) Classification and Measurement of Financial Assets*

The classification and measurement of financial assets is driven by the Group's business models for managing the financial assets and the contractual cash flow characteristics of the financial assets. The Group's classification and measurement of financial assets are described below.

*(i) Financial Assets at Amortized Cost*

Financial asset is measured at amortized cost if both of the following conditions are met:

- the financial asset is held within the Group's business model whose objective is to hold financial assets in order to collect contractual cash flows ("hold to collect or HTC"); and,
- the contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI on the principal amount outstanding.

Financial assets meeting these criteria are measured initially at fair value and are subsequently measured at amortized cost using the effective interest method, less any allowance for expected credit loss (ECL).

Where the business model is to hold assets to collect contractual cash flows, the Group assesses whether the financial instruments' cash flows represent SPPI. In making this assessment, the Group considers whether the contractual cash flows are consistent with basic lending arrangements, i.e., interest includes only consideration for the time value of money, credit risk, other basic lending risks and a profit margin. Where the contractual terms introduce exposure to risk or volatility that are inconsistent with basic lending arrangements, the related financial asset is classified and measured at FVTPL.

The Group's financial assets measured at amortized cost include those presented in the statement of financial position as Cash and Other Cash Items, Due from BSP, Due from Other Banks, Loans Arising from Reverse Repurchase Agreements, Investment securities at amortized cost under Trading and Investment Securities, Loans and Receivables and certain Other Resources accounts.

For purposes of cash flows reporting and presentation, cash equivalents comprise of accounts with original maturities of three months or less, including non-restricted balances of Due from BSP, Due from Other Banks, Loans Arising from Reverse Repurchase Agreements, and Interbank loans receivables (part of Loans and Receivables). Cash equivalents are short-term, highly liquid investments that are readily convertible to known amounts of cash and which are subject to insignificant risk of changes in value. Cash comprises cash and other cash items and demand deposits.

The Group may irrevocably elect at initial recognition to classify a financial asset that meets the amortized cost criteria as at FVTPL if that designation eliminates or significantly reduces an accounting mismatch had the financial asset been measured at amortized cost. In 2019 and 2018, the Group has not made such designation.

*(ii) Financial Assets at Fair Value Through Other Comprehensive Income*

Financial asset is classified and measured at FVOCI if both of the following conditions are met:

- the financial asset is held under a business model whose objective is achieved by both collecting contractual cash flows and selling (“hold to collect and sell”); and,
- the contractual terms of the financial asset give rise to cash flows that are SPPI on the principal amount outstanding.

At initial recognition, the Group can make an irrevocable election (on an instrument-by-instrument basis) to designate equity investments as at FVOCI; however, such designation is not permitted if the equity investment is held by the Group for trading or a contingent consideration recognized arising from a business combination. The Group has made irrevocable designation of equity instruments not held for trading into this category.

After initial recognition, financial assets at FVOCI are subsequently measured at fair value, with no deduction for any disposal costs. Gains and losses arising from changes in fair value, including the foreign exchange component, are recognized in other comprehensive income, net of any effects arising from income taxes, and are reported as part of Revaluation Reserves account in equity. Upon disposal, the cumulative fair value gains or losses on equity investments previously recognized in the Revaluation Reserves account is not reclassified to profit or loss, but is reclassified directly to Surplus account, while the cumulative fair value gains or losses for debt securities are reclassified to profit or loss.

Any dividends earned on holding equity instruments are recognized in profit or loss as part of Miscellaneous under Other Operating Income account, when the Group’s right to receive dividends is established, it is probable that the economic benefits associated with the dividend will flow to the Group, and the amount of the dividend can be reliably measured, unless the dividends clearly represent recovery of a part of the cost of the investment.

*(iii) Financial Assets at Fair Value Through Profit or Loss*

Debt instruments that do not meet the amortized cost criteria, or that meet the criteria but the Group has chosen to designate as at FVTPL at initial recognition, or those that do not qualify under the FVOCI or “hold to collect and sell” business model, are measured at FVTPL. Equity investments are classified as financial assets at FVTPL, unless the Group designates an equity investment that is not held for trading as at FVOCI at initial recognition. The Group’s financial assets at FVTPL include government securities, corporate debt securities, equity securities, and derivative instruments, which are held for trading purposes or designated as at FVTPL.

A financial asset is considered as held for trading if:

- it has been acquired principally for the purpose of selling it in the near term;
- on initial recognition, it is part of a portfolio of identified financial instruments that the Group manages together and has evidence of a recent actual pattern of short-term profit-taking; or,
- it is a derivative that is not designated and effective as a hedging instrument or financial guarantee.

Financial assets at FVTPL are measured at fair value. Unrealized gains and losses arising from changes (mark-to-market) in the fair value of the financial assets at FVTPL category and realized gains or losses arising from disposals of these instruments are included in Trading and Securities Gains (Losses) under Other Operating Income account in the statement of profit or loss.

Interest earned on these investments is reported in profit or loss under Interest Income account while dividend income is reported in profit or loss under Miscellaneous included in Other Operating Income account when the right of payment has been established.

*(b) Recognition of Interest Income Using Effective Interest Rate Method*

Interest income on financial assets measured at amortized cost and all interest-bearing debt financial assets classified as at FVTPL, or at FVOCI, is recognized using the effective interest rate method. The effective interest rate is the rate that exactly discounts estimated future cash receipts through the expected life of the financial instrument or, when appropriate, a shorter period, to the net carrying amount of the financial asset.

The effective interest rate is calculated by taking into account any discount or premium on acquisition, fees and costs that are an integral part of effective interest rate. The Group recognizes interest income using a rate of return that represents the best estimate of a constant rate of return over the expected life of the instrument; hence, it recognizes the effect of potentially different interest rates charged at various stages, and other characteristics of the product life cycle (including prepayments, penalty interest and charges).

If expectations regarding the cash flows on the financial asset are revised for reasons other than credit risk, the adjustment is booked as a positive or negative adjustment to the carrying amount of the asset with an increase or reduction in interest income. The Group calculates interest income by applying the effective interest rate to the gross carrying amount of the financial assets, except for those that are subsequently identified as credit-impaired and or are purchased or originated credit-impaired assets.

For financial assets that have become credit-impaired subsequent to initial recognition, interest income is calculated by applying the effective interest rate to the net carrying amount of the financial assets (after deduction of the loss allowance). If the asset is no longer credit-impaired, the calculation of interest income reverts to gross basis. For financial assets that were credit-impaired on initial recognition, interest income is calculated by applying a credit-adjusted effective interest rate to the amortized cost of the asset. The calculation of interest income does not revert to a gross basis even if the credit risk of the asset subsequently improves.

*(c) Reclassification of Financial Assets*

The Group can only reclassify financial assets if the objective of its business model for managing those financial assets changes. Accordingly, the Group is required to reclassify financial assets: (i) from amortized cost to FVTPL, if the objective of the business model changes so that the amortized cost criteria are no longer met; and, (ii) from FVTPL to amortized cost, if the objective of the business model changes so that the amortized cost criteria start to be met and the characteristic of the instrument’s contractual cash flows meet the amortized cost criteria.

A change in the objective of the Group’s business model will be effected only at the beginning of the next reporting period following the change in the business model.



*(d) Impairment of Financial Assets*

The Group recognizes a loss allowance for ECL on all financial assets that are measured at amortized cost and debt instruments classified as at FVOCI, as well as financial guarantee and loan commitments.

Equity securities, either measured as at FVTPL or designated as at FVOCI, are not subject to impairment.

The Group measures the ECL of a financial asset in such manner that reflects: (i) the time value of money; and, (ii) reasonable and supportable information about past events, current conditions and forecasts of future economic conditions that affect the collectability of the future cash flows of the financial assets.

The amount of allowance for ECL is updated at the end of each reporting period to reflect the changes in credit risk of the financial asset since initial recognition. The Group recognizes lifetime ECL when there has been a significant increase in credit risk (SICR) since initial recognition. However, if the credit risk on the financial instrument has not increased significantly since initial recognition, the Group measures the loss allowance for that financial instrument at an amount equal to 12-month ECL. Lifetime ECL represents the expected credit losses that will result from all possible default events over the expected life of a financial instrument. In contrast, 12-month ECL represents the portion of lifetime ECL that is expected to result from default events on a financial instrument that are possible within 12 months after the end of the reporting period.

The Group's ECL model follows a three-stage impairment approach, which guide in the determination of the loss allowance to be recognized in the financial statements. The staging of financial assets and definition of default for purposes of determining ECL are further discussed in Note 4.4.

ECL is a function of the probability of default (PD), loss-given default (LGD), and exposure-at-default (EAD), with the timing of the loss also considered, and is estimated by incorporating forward-looking economic information and through the use of experienced credit judgement. These elements are discussed more fully in Note 4.4.

The Group calculates ECL either on an individual or a collective basis. For modelling ECL parameters which were carried out on a collective basis, the financial instruments are grouped on the basis of shared credit risk characteristics, such as but not limited to instrument type, credit risk rating, collateral type, product type, historical net charge-offs, industry type, and geographical locations of the borrowers or counterparties.

The Group applies a simplified ECL approach for its accounts receivables wherein the Group uses a provision matrix that considers historical changes in the behavior of the portfolio of credit exposures based on internally collected data to predict conditions over the span of a given observation period. These receivables include claims from various counterparties, which are not originated through the Group's lending activities. For these instruments, the Group measures the loss allowance at an amount equal to lifetime ECL.

The Group recognizes an impairment loss in profit or loss for all financial instruments subjected to ECL impairment assessment with a corresponding adjustment to their carrying amount through a loss allowance account. With respect to investments in debt securities that are measured at FVOCI, the related loss allowance account is recognized in other comprehensive income and accumulated in the Revaluation Reserves account, and does not reduce the carrying amount of the financial asset in the statement of financial position. For loan commitments, the loss allowance is recognized as provisions (presented and included as part of Other Liabilities account in the statement of financial position). Where a financial instrument includes a drawn and undrawn component, and the Group cannot identify the ECL on the loan commitment component separately from those on the drawn commitment; the Group presents a combined allowance for ECL 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 provisions.

*(e) Financial Liabilities at Amortized Cost*

Financial liabilities including deposit liabilities, bills payable, bonds payable, subordinated debt, accrued interest and other expenses, and other liabilities (except derivatives with negative fair value, tax-related payables, post-employment defined benefit obligation and deferred income) are recognized initially at their fair value and subsequently measured at amortized cost using the effective interest method, for those with maturities beyond one year, less settlement payments.

All interest-related charges incurred on financial liabilities are recognized as an expense in the statement of profit or loss under the caption Interest Expense.

Deposit liabilities are stated at amounts in which they are to be paid. Interest is accrued periodically and recognized in a separate liability account before recognizing as part of deposit liabilities.

Bills payable, bonds payable and subordinated debt are recognized initially at fair value, which is the issue proceeds (fair value of consideration received), net of direct issue costs. These are subsequently measured at amortized cost; any difference between the proceeds net of transaction costs and the redemption value is recognized in profit or loss over the period of the borrowings using the effective interest method.

Dividend distributions to shareholders are recognized as financial liabilities when the dividends are declared by the Group.

*(f) Derecognition of Financial Assets**(i) Modification of Loans*

When the Group derecognizes a financial asset through renegotiation or modification of the contractual payment terms of the loans due to significant credit distress of the borrower, the Group assesses whether or not the new terms are substantially different to the original terms of the instrument.

In making such assessment, the Group considers, among others:

- if the borrower is in financial difficulty, whether the modification merely reduces the contractual cash flows to amounts the borrower is expected to be able to pay;
- whether any substantial new terms are introduced that will affect the risk profile of the loan;
- significant extension of the loan term when the borrower is not in financial difficulty;
- significant change in the interest rate;
- change in the currency the loan is denominated in; and/or,
- insertion of collateral, other security or credit enhancements that will significantly affect the credit risk associated with the loan.

If the terms are substantially different, the Group derecognizes the original financial asset and recognizes a new asset at fair value, and recalculates a new effective interest rate for the asset. The date of renegotiation is considered to be the date of initial recognition for impairment calculation, including for the purpose of determining whether SICR has occurred. However, the Group also assesses whether the new financial asset recognized is deemed to be credit-impaired at initial recognition, especially in circumstances where the renegotiation was driven by the debtor being unable to make the originally agreed payments. Differences in the carrying amount between the old financial asset derecognized and the fair value of the new financial asset are recognized as gain or loss in profit or loss upon derecognition. As to the impact on ECL measurement, the expected fair value of the new financial asset is treated as the final cash flow from the existing financial asset at the date of derecognition. Such amount is included in the calculation of 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.

If the terms are not substantially different, the renegotiation or modification does not result in derecognition, and the Group recalculates the gross carrying amount based on the revised cash flows of the financial asset and recognizes the gain or loss arising from the modification in profit or loss. The new gross carrying amount is recalculated by discounting the modified cash flows of the original effective interest rate (or credit-adjusted effective interest rate for purchased or originated credit-impaired financial assets).

As to the impact on ECL measurement, the derecognition of the existing financial asset will result in the expected cash flows arising from the modified financial asset to be included in the calculation of cash shortfalls from the existing financial asset.

*(ii) Derecognition of Financial Assets Other than Modification*

A financial asset (or where applicable, a part of a financial asset or part of a group of financial assets) is derecognized when the contractual rights to receive cash flows from the financial instruments expire, or when the financial assets and all substantial risks and rewards of ownership have been transferred to another party. If the Group neither transfers nor retains substantially all the risks and rewards of ownership and continues to control the transferred financial asset, the Group recognizes its retained interest in the financial asset and an associated liability for amounts it may have to pay. If the Group retains substantially all the risks and rewards of ownership of a transferred financial asset, the Group continues to recognize the financial asset and also recognizes a collateralized borrowing for the proceeds received.

*(g) Derecognition of Financial Liabilities*

Financial liabilities are derecognized from the statement of financial position only when the obligations are extinguished either through discharge, cancellation or expiration. Where an existing financial liability is replaced by another from the same lender on substantially different terms, or if the terms of an existing liability are substantially modified, such an exchange or modification is treated as a derecognition of the original liability and a recognition of the new liability, and the difference in the respective carrying amounts is recognized as gain or loss in profit or loss.

*(h) Financial Guarantees and Undrawn Loan Commitments*

The Group issues financial guarantees and loan commitments. Financial guarantees are those issued by the Group to creditors as allowed under existing rules and regulations whereby it guarantees third party obligations by signing as guarantor in the contract or agreement. Undrawn loan commitments and letters of credit are commitments under which, over the duration of the commitment, the Group is required to provide a loan with pre-specified terms to the customer. The nominal contractual value of financial guarantees and undrawn loan commitments, where the loan agreed to be provided is on market terms, are not reflected in the statement of financial position. These contracts are in the scope of the ECL requirements where the Group estimates the expected portion of the irrevocable undrawn loan commitments that will be drawn over their expected life based on the Group's historical observations of actual drawdowns and forward-looking forecasts. The ECL related to financial guarantees and loan commitments without outstanding drawn amounts is recognized under Other Liabilities account in the statement of financial position.

**2.6 Derivative Financial Instruments and Hedge Accounting**

The Group is a party to various foreign currency forward contracts, cross currency swaps, futures, interest rate swaps, debt warrants, options and credit default swap. These contracts are entered into as a service to customers and as a means of reducing or managing the Group's foreign exchange and interest rate exposures as well as for trading purposes. Amounts contracted are recorded as contingent accounts and are not included in the statement of financial position.

Derivatives are categorized as Financial Assets at FVTPL which are initially recognized at fair value on the date on which a derivative contract is entered into and are subsequently measured at their fair value. Fair values are obtained from active markets for listed or traded securities or determined using valuation techniques if quoted prices are not available, including discounted cash flow models and option pricing models, as appropriate. The change in fair value of derivative financial instruments is recognized in profit or loss, except when their effects qualify as a hedging instrument. Derivatives are carried as assets when fair value is positive and as liabilities when fair value is negative.

The best evidence of the fair value of a derivative at initial recognition is the transaction price (i.e., the fair value of the consideration given or received) unless the fair value of that instrument is evidenced by comparison with other observable current market transactions in the same instrument (i.e., without modification or repackaging) or based on a valuation technique whose variables include only data from observable markets. When such evidence exists, the Group recognizes a gain or loss at initial recognition.

## 2.7 Offsetting Financial Instruments

Financial assets and liabilities are offset and the resulting net amount, considered as a single financial asset or financial liability, is reported in the statement of financial position when there is a legally enforceable right to offset the recognized amounts and there is an intention to settle on a net basis, or realize the asset and settle the liability simultaneously. The right of set-off must be available at the end of the reporting period, that is, it is not contingent on future event. It must also be enforceable in the normal course of business, in the event of default, and in the event of insolvency or bankruptcy; and, must be legally enforceable for both entity and all counterparties to the financial instruments.

## 2.8 Bank Premises, Furniture, Fixtures and Equipment

Land is stated at cost less impairment losses, if any. As no finite useful life for land can be determined, the related carrying amounts are not depreciated. All other bank premises, furniture, fixtures and equipment are carried at cost less accumulated depreciation, amortization and any impairment in value.

The cost of an asset comprises its purchase price and directly attributable costs of bringing the asset to working condition for its intended use. Expenditures for additions, major improvements and renewals are capitalized, while expenditures for repairs and maintenance are charged to expense as incurred.

Depreciation is computed using the straight-line method over the estimated useful lives of the depreciable assets as follows:

Buildings	20-50 years
Furniture, fixtures and equipment	3-15 years

Leasehold rights and improvements are amortized over the term of the lease or the estimated useful lives of the improvements, whichever is shorter.

An asset's carrying amount is written down immediately to its recoverable amount if the asset's carrying amount is greater than its estimated recoverable amount (see Note 2.18).

The residual values, estimated useful lives, and method of depreciation and amortization of bank premises, furniture, fixtures and equipment (except land) are reviewed and adjusted if appropriate, at the end of each reporting period. An item of bank premises, furniture, fixtures and equipment, including the related accumulated depreciation, amortization and any impairment losses, is derecognized upon disposal or when no future economic benefits are expected to arise from the continued use of the asset. Any gain or loss arising on derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the item) is included in profit or loss in the year the item is derecognized.

## 2.9 Investment Properties

Investment properties pertain to land, buildings or condominium units acquired by the Group, in settlement of loans from defaulting borrowers through foreclosure or dacion in payment, which are either held by the Group for sale in the next 12 months or being used in the rendering of services or for administrative purposes. This also includes properties held for rental.

Investment properties are stated at cost, less accumulated depreciation and any impairment losses (see Note 2.18). The cost of an investment property comprises its purchase price and directly attributable costs incurred such as legal fees, transfer taxes and other transaction costs.

Transfers from other accounts (such as bank premises, furniture, fixtures and equipment) are made to investment properties when and only when, there is a change in use, evidenced by ending of owner-occupation or commencement of an operating lease to another party or holding the property for capital appreciation, while transfers from investment properties are made when, and only when, there is a change in use, evidenced by commencement of owner-occupation or commencement of development with a view to sell. In isolation, a change in management's intentions for the use of a property does not provide evidence of a change in use.

Depreciation and impairment loss are recognized in the same manner as in bank premises, furniture, fixtures and equipment.

Direct operating expenses related to investment properties, such as repairs and maintenance, and real estate taxes are normally charged against current operations in the period in which these costs are incurred.

Investment properties, including the related accumulated depreciation and any impairment losses, are derecognized upon disposal or when permanently withdrawn from use and no future economic benefit is expected from its disposal. Any gain or loss on the retirement or disposal of investment properties is recognized in Miscellaneous Income or Miscellaneous Expense, respectively, under Other Operating Income or Other Operating Expenses, respectively, in the year of retirement or disposal.

## 2.10 Assets Held-for-Sale and Disposal Group

Assets held-for-sale and disposal group, which are presented as part of Other Resources account, include shares of stock and real and other properties acquired through repossession, foreclosure, exchange or purchase that the Group intends to sell within one year from the date of classification as held-for-sale and for which the Group is committed to immediately dispose through an active marketing plan. The Group classifies an asset (or disposal group) as held-for-sale if its carrying amount will be recovered principally through a sale transaction rather than through continuing use.

In the event that the sale of the asset is extended beyond one year, the extension of the period required to complete the sale does not preclude an asset from being classified as held-for-sale if the delay is caused by events or circumstances beyond the Group's control and there is sufficient evidence that the Group remains committed to its plan to sell the asset.

Assets classified as held-for-sale are measured at the lower of their carrying amounts, immediately prior to their classification as held-for-sale and their fair value less costs to sell. Assets classified as held-for-sale are not subject to depreciation or amortization. Asset that ceases to be classified as held-for-sale is measured at the lower of: (a) its carrying amount before the asset was classified as held-for-sale, adjusted for any depreciation, amortization or revaluations that would have been recognized had the asset not been classified as held-for-sale; and, (b) its recoverable amount at the date of the subsequent decision not to sell. Any adjustment to the carrying amount of an asset that ceases to be classified as held-for-sale resulting in either a gain or loss, is recognized in profit or loss. The Group recognizes an impairment loss for any initial or subsequent write-down of the assets held-for-sale to fair value less cost to sell, to the extent that it has not been previously recognized in profit or loss.

On the other hand, any gain from any subsequent increase in fair value less costs to sell of an asset up to the extent of the cumulative impairment loss that has been previously recognized is recognized in profit or loss.

The gains or losses arising from the sale or remeasurement of assets held-for-sale is recognized in Miscellaneous Income (Expenses) under the Other Operating Income (Expenses) account in the statement of profit or loss.



### 2.11 Intangible Assets

Intangible assets include goodwill, branch licenses, trading right, and computer software licenses which are accounted for under cost model and are reported under Other Resources account in the statement of financial position. The cost of the asset is the amount of cash and cash equivalents paid or the fair value of the other considerations given to acquire an asset at the time of acquisition.

Goodwill represents the excess of the cost of acquisition over the fair value of the identifiable net assets acquired at the date of acquisition (see Note 2.3).

Branch licenses represent the rights given by the BSP to the Group to establish a certain number of branches in various areas in the country.

Goodwill and branch licenses are classified as intangible assets with indefinite useful life and, thus, not subject to amortization but are tested annually for impairment (see Note 2.18). After initial recognition, goodwill and branch licenses are subsequently carried at cost less accumulated impairment losses. Goodwill is allocated to cash-generating units for the purpose of impairment testing. Each of those generating units is represented by each primary reporting segment.

Trading right, included as part of Miscellaneous under Other Resources account, represents the right given to RSI, a subsidiary engaged in stock brokerage, to preserve its access to the trading facilities and to transact business at the PSE. Trading right is assessed as having an indefinite useful life. It is carried at the amount allocated from the original cost of the exchange membership seat (after a corresponding allocation was made to the value of the PSE shares) less allowance for impairment, if any. The trading right is tested annually for any impairment in value (see Note 2.18).

Acquired computer software licenses are capitalized on the basis of the costs incurred to acquire and bring to use the specific software. These costs are amortized on a straight line basis over the expected useful lives of the software of three to ten years.

Costs associated with developing or maintaining computer software programs are recognized as expense as incurred. Costs that are directly associated with the production of identifiable and unique software products controlled by the Group, and that will probably generate economic benefits exceeding costs beyond one year, are recognized as intangible assets. Direct costs include employee costs incurred on software development and an appropriate portion of relevant overhead costs.

Computer software development costs recognized as assets are amortized using the straight-line method over their useful lives (not exceeding ten years).

When an intangible asset is disposed of, the gain or loss on disposal is determined as the difference between the proceeds and the carrying amount of the asset and is recognized in profit or loss.

### 2.12 Other Resources

Other resources (excluding items classified as intangible assets) pertain to other assets controlled by the Group as a result of past events. These are recognized in the financial statements when it is probable that the future economic benefits will flow to the Group and the asset has a cost or value that can be measured reliably.

### 2.13 Provisions and Contingencies

Provisions are recognized when present obligations will probably lead to an outflow of economic resources and they can be estimated reliably even if the timing or amount of the outflow may still be uncertain. A present obligation arises from the presence of a legal or constructive obligation that has resulted from past events (e.g., legal dispute or onerous contracts).

Provisions are measured at the estimated expenditure required to settle the present obligation, based on the most reliable evidence available at the end of the reporting period, including the risks and uncertainties associated with the present obligation. Where there are a number of similar obligations, the likelihood that an outflow will be required in settlement is determined by considering the class of obligations as a whole.

When time value of money is material, long-term provisions are discounted to their present values using a pretax rate that reflects market assessments and the risks specific to the obligation. The increase in provision due to passage of time is recognized as interest expense.

Provisions are reviewed at the end of each reporting period and adjusted to reflect the current best estimate.

In those cases, where the possible outflow of economic resource as a result of present obligations is considered improbable or remote, or the amount to be provided for cannot be measured reliably, no liability is recognized in the financial statements. Similarly, possible inflows of economic benefits to the Group that do not yet meet the recognition criteria of an asset are considered contingent assets; hence, are not recognized in the financial statements. On the other hand, any reimbursement that the Group can be virtually certain to collect from a third party with respect to the obligation is recognized as a separate asset not exceeding the amount of the related provision.

### 2.14 Equity

Preferred and common stock represent the nominal value of shares of stock that have been issued. Capital paid in excess of par includes any premiums received on the issuance of capital stock. Any transaction costs associated with the issuance of shares of stock are deducted from capital paid in excess of par, net of any related income tax benefits.

Treasury shares are stated at the cost of reacquiring such shares and are deducted from equity attributable to the Parent Company's equity holders until the shares are cancelled, reissued or disposed of.

Revaluation reserves consist of:

- (a) Net unrealized fair value gains or losses arising from remeasurements of financial assets at FVOCI;
- (b) Reserves on remeasurements of post-employment defined benefit plan comprising of net accumulated actuarial gains or losses arising from experience adjustments and other changes in actuarial assumptions, and actual return on plan assets (excluding account included in net interest);
- (c) Accumulated translation adjustments related to the cumulative gains from the translation of the financial statements of foreign subsidiaries whose functional currency is different from that of the Parent Company; and,
- (d) Share in other comprehensive income or loss of subsidiaries and associates.

Reserve for trust business representing the accumulated amount set aside by the Group under existing regulations requiring the Parent Company to appropriate and transfer to surplus 10% of its net profits accruing from their trust business until the surplus shall amount to 20% of the regulatory capital. The reserve shall not be paid out in dividends, but losses accruing in the course of the trust business may be charged against this account.

Other reserves refer to the amount attributable to the Parent Company arising from the changes in the ownership of the NCI in the Group.

Surplus represents all current and prior period results of operations as disclosed in the statement of profit or loss, reduced by the amount of dividends declared.

General loan loss reserve pertains to the accumulated amount of appropriation from Surplus made by the Group arising from the excess of the one-percent general loan loss provisions for outstanding loans as required by the BSP under Circular No. 1011, *Guidelines on the Adoption of PFRS 9* (Circular No. 1011) over the computed allowance for ECL.

NCI represents the portion of the net assets and profit or loss not attributable to the Group and are presented separately in the consolidated statement of profit or loss and consolidated statement of comprehensive income and within equity in the consolidated statement of financial position and consolidated statement of changes in equity.

### 2.15 Other Income and Expense Recognition

Revenue is recognized when (or as) the Group satisfies a performance obligation by transferring control of the promised services to the customer. A contract with a customer that results in a recognized financial instrument in the Group's financial statements may partially be within the scope of PFRS 9 and partially within the scope of PFRS 15, *Revenue from Contracts from Customers*. In such case, the Group first applies PFRS 9 to separate and measure the part of the contract that is in-scope of PFRS 9, and then applies PFRS 15 to the residual part of the contract. Expenses and costs, if any, are recognized in profit or loss upon utilization of the assets or services or at the date these are incurred. All finance costs are reported in profit or loss on accrual basis.

The Group also earns service fees and commissions in various banking services, and gains on sale of properties, which are supported by contracts approved by the parties involved. These revenues are accounted for by the Group in accordance with PFRS 15.

For revenues arising from these various banking services which are to be accounted for under PFRS 15, the following provides information about the nature and timing of satisfaction of performance obligations in contracts with customers, including significant payment terms, and the related revenue recognition policies:

#### a) Charges, Fees and Commissions

The following charges, fees and commissions are recognized as follows:

- (i) *Commissions and fees* – these income arising from loans, deposits, and other banking transactions are recognized as income based on agreed terms and conditions with customers, which are generally when the services have been performed.

- (ii) *Annual membership fees* – pertains to annual fees charged to credit cardholders. Revenues from membership fees are recognized over time from the date of renewal of the credit card until the validity date covered by the said renewal, usually termed as the expiry date of the issued cards. The credit card's validity period is deemed to be servicing period.

- (iii) *Interchange fees, net of interchange costs* – are recognized as income upon presentation by member establishments of charges arising from RCBC Bankard and non-RCBC Bankard (associated with MasterCard, JCB, VISA and China UnionPay labels) credit card availments passing through the Point of Sale (POS) terminals of the Parent Company. These discounts are computed based on agreed rates and are deducted from the amounts remitted to member establishments. Interchange costs pertain to the other credit card companies' share in RCBC Bankard's merchant discounts whenever their issued credit cards transact in the Parent Company's POS terminals.

The Parent Company has a rewards program related to its credit card operations, which allows its cardholders to accumulate award credits or loyalty points that can be redeemed for free products. The loyalty points give rise to a separate performance obligation as they provide a material right to the cardholder.

Accordingly, the Parent Company allocates a portion of the interchange fee billed to participating merchants to the loyalty points granted to cardholders based on relative stand-alone selling price and recognizes liability equivalent to the estimated loyalty points until these are redeemed. Revenue is recognized upon actual redemption by the cardholder.

- (iv) *Loan syndication fees* - are recognized as revenue when the syndication has been completed and the Group retained no part of the loan package for itself or retained a part at the same effective interest rate for the other participants.
- (v) *Underwriting and arrangers fees* – are fees arising from negotiating, or participating in the negotiation of a transaction for a third party such as arrangement of the acquisition of shares or other securities or the purchase or sale of businesses, are recognized at the completion of the underlying transaction and where there are no further obligations to perform under the agreement.

#### b) Trust Fees

These are service fees calculated in reference to the net asset value of the funds managed and deducted from the customer's account balance on a monthly basis which are recognized over time as the asset management services are provided. These are also applicable for wealth management and asset custody services that are continuously provided over an extended period of time.

For other income outside the scope of PFRS 15, the following provides information about the nature and the related revenue recognition policies:

#### a) Trading and Securities Gains (Losses)

These are recognized when the ownership of the securities is transferred to the buyer and is computed as the difference between the selling price and the carrying amount of the securities disposed of. These also include trading gains and losses as a result of the mark-to-market valuation of investment securities classified as FVTPL.

b) *Gains on Assets Sold*

Gains on assets sold arise from the disposals of bank premises, furniture, fixtures and equipment, investment properties, real estate properties for sale, and assets held-for-sale. The Group recognizes the gain on sale at the time the control of the assets is transferred to the buyer, when the Group does not retain either continuing managerial involvement to the degree usually associated with ownership, or effective control over the assets sold, and when the collectability of the entire sales price is reasonably assured. Gains on assets sold are included as part of Miscellaneous income under Other Operating Income account in the statement of profit or loss.

c) *Dividend Income*

Dividend income is recognized when the Group's right to receive payment is established.

Collections from accounts, which did not qualify for revenue recognition are treated as customers' deposit included as part of Accounts payable under Other Liabilities account in the statement of financial position.

Costs and expenses are recognized in profit or loss upon utilization of the assets and/or services or at the date those are incurred. All finance costs are reported in profit or loss on accrual basis, except capitalized borrowing costs which are included as part of the cost of the related qualifying asset, if any (see Note 2.20).

## 2.16 Leases

The Group accounts for its leases as follows:

(a) *Group as Lessee*

(i) *Accounting for Leases in Accordance with PFRS 16 (2019)*

For any new contracts entered into on or after January 1, 2019, the Group considers whether a contract is, or contains, a lease. A lease is defined as a contract, or part of a contract, that conveys the right to use an asset (the underlying asset) for a period of time in exchange for consideration. To apply this definition, the Group assesses whether the contract meets three key evaluations which are whether:

- the contract contains an identified asset, which is either explicitly identified in the contract or implicitly specified by being identified at the time the asset is made available to the Group;
- the Group has the right to obtain substantially all of the economic benefits from use of the identified asset throughout the period of use, considering its rights within the defined scope of the contract; and,
- the Group has the right to direct the use of the identified asset throughout the period of use. The Group assesses whether it has the right to direct 'how and for what purpose' the asset is used throughout the period of use.

The right-of-use asset is measured at cost, which is made up of the initial measurement of the lease liability, estimates of any costs to dismantle and remove the asset at the end of the lease, and any lease payments made in advance of the lease commencement date (net of any incentives received). Subsequently, the Group depreciates the right-of-use asset on a straight-line basis from the lease commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term. The Group also assesses the Right-of-use asset for impairment when such indicators exist (see Note 2.18).

On the other hand, the Group measures the lease liability at the present value of the lease payments unpaid at the commencement date, discounted using the interest rate implicit in the lease if that rate is readily available or the Group's incremental borrowing rate. Lease payments include fixed payments (including in-substance fixed) less lease incentives receivable, if any, variable lease payments based on an index or rate, amounts expected to be payable under a residual value guarantee, and payments arising from options (either renewal or termination) reasonably certain to be exercised. Subsequent to initial measurement, the liability will be reduced for payments made and increased for interest. It is remeasured to reflect any reassessment or modification, or if there are changes in in-substance fixed payments. When the lease liability is remeasured, the corresponding adjustment is reflected in the right-of-use asset, or to profit and loss if the right-of-use asset is already reduced to zero.

The Group has elected to account for short-term leases and leases of low-value assets using the practical expedients. Instead of recognizing a right-of-use asset and lease liability, the payments in relation to these are recognized as an expense in profit or loss on a straight-line basis over the lease term.

On the statement of financial position, Right-of-use assets and Lease liabilities have been included as part of Bank Premises, Furniture, Fixtures and Equipment, and Other Liabilities, respectively.

(ii) *Accounting for Leases in Accordance with PAS 17 (2018)*

Leases which do not transfer to the Group substantially all the risks and benefits of ownership of the asset are classified as operating leases. Operating lease payments (net of any incentive received from the lessor) are recognized as expense in profit or loss on a straight-line basis over the lease term. Associated costs, such as repairs and maintenance and insurance, are expensed as incurred.

The Group determines whether an arrangement is, or contains, a lease based on the substance of the arrangement. It makes an assessment of whether the fulfillment of the arrangement is dependent on the use of a specific asset or assets and the arrangement conveys a right to use the asset. A reassessment is made after inception of the lease, only if one of the following applies:

- there is a change in contractual terms, other than a renewal or extension of the arrangement;
- a renewal option is exercised or extension granted, unless that term of the renewal or extension was initially included in the lease term;
- there is a change in the determination of whether fulfillment is dependent on a specified asset; or,
- there is a substantial change to the asset.

*(b) Group as Lessor*

Leases which transfer to the lessee all risks and benefits incidental to ownership of the leased item are classified as finance leases and are presented at an amount equal to the Group's net investment in the lease. Finance income is recognized based on the pattern reflecting a constant periodic rate of return on the Group's net investment outstanding in respect of the finance lease, and is included as part of Interest Income on loans and receivables.

Leases which do not transfer to the lessee substantially all the risks and benefits of ownership of the asset are classified as operating leases. Lease income from operating leases is recognized in profit or loss on a straight-line basis over the lease term. These are recognized as part of Miscellaneous income under Other Operating Income account in the statement of profit or loss.

**2.17 Foreign Currency Transactions and Translations**

The Group's transactions in foreign currencies are accounted for as follows:

*(a) Transactions and Balances*

Except for the foreign subsidiaries and accounts of the Group's foreign currency deposit unit (FCDU), the accounting records of the Group are maintained in Philippine pesos. Foreign currency transactions during the period are translated into the functional currency at exchange rates which approximate those prevailing at transaction dates. Resources and liabilities denominated in foreign currencies are translated to Philippine pesos at the prevailing Bankers Association of the Philippines closing rates (BAPCR) [Philippine Dealing System closing rates (PDSCR) for 2017 and prior] at the end of the reporting period.

Foreign exchange gains and losses resulting from the settlement of foreign currency transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognized in profit or loss, except when recognized in other comprehensive income and deferred in equity as qualifying cash flow hedges and qualifying net investment hedges. Translation differences on non-monetary items, such as equity securities classified as at FVTPL, are reported as part of fair value gain or loss in profit or loss.

For financial reporting purposes, the accounts of the FCDU are translated into their equivalents in Philippine pesos based on the BAPCR (PDSCR for 2017 and prior) prevailing at the end of each reporting period (for resources and liabilities) and at the weighted average BAPCR (PDSCR for 2017 and prior) for the period (for income and expenses). Any foreign exchange difference is recognized in profit or loss.

Changes in the fair value of monetary financial assets (debt securities) denominated in foreign currency classified as financial assets at FVTPL and financial assets at FVOCI are analyzed between translation differences resulting from changes in the amortized cost of the security and other changes in the carrying amount of the security. Accordingly, translation differences related to changes in amortized cost of investment in debt securities are recognized in profit or loss, and other changes in the carrying amount are recognized as gains and losses in other comprehensive income.

*(b) Translation of Financial Statements of Foreign Subsidiaries*

The results of operations and financial position of all the Group's foreign subsidiaries (none of which has the currency dependency of a hyperinflationary economy) that have a functional currency different from the presentation currency are translated into the presentation currency as follows:

- (i)* Assets and liabilities at the end of each reporting period as presented in the statement of financial position are translated at the closing rate at the date of that statement of financial position;
- (ii)* Income and expenses are translated at average exchange rates during the period (unless this average is not a reasonable approximation of the cumulative effect of the rates prevailing on the transactions' dates, in which case income and expenses are translated at the dates of the transactions); and,
- (iii)* All resulting exchange differences are recognized as a component of equity.

In consolidation, exchange differences arising from the translation of the net investment in foreign entities are recognized in other comprehensive income which form part of Revaluation Reserves account in equity. When a foreign operation is sold, the accumulated translation and exchange differences are recognized in profit or loss as part of the gain or loss on assets sold.

The translation of the financial statements into Philippine peso should not be construed as a representation that the amounts stated in currencies other than the Philippine peso could be converted in Philippine peso amounts at the translation rates or at any other rates of exchange.

**2.18 Impairment of Non-financial Assets**

Investments in subsidiaries and associates, bank premises, furniture, fixtures and equipment (including right-of-use asset), investment properties, and other resources (including intangible assets and non-current assets held for sale) and other non-financial assets are subject to impairment testing. Intangible assets (including goodwill, branch licenses and trading rights) with an indefinite useful life or those not yet available for use are tested for impairment at least annually.

For purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows [cash-generating units (CGU)]. As a result, some assets are tested for impairment either individually or at the CGU level. Except for intangible assets with an indefinite useful life (i.e., goodwill, branch licenses and trading rights) or those not yet available for use, individual assets or CGU are tested for impairment whenever events or changes in circumstances indicate that their carrying amount may not be recoverable.

Goodwill is reviewed for impairment annually or more frequently if events or changes in circumstances indicate that the carrying value may be impaired. Impairment is determined for goodwill by assessing the recoverable amount of the CGU (or group of CGUs) to which the goodwill relates. Where the recoverable amount of the CGU (or group of CGUs) is less than the carrying amount of the CGU (or group of CGUs) to which goodwill has been allocated, an impairment loss is recognized immediately in profit or loss. Impairment losses relating to goodwill cannot be reversed for subsequent increases in its recoverable amount in future periods.

Other intangible assets with indefinite useful lives, branch licenses and exchange trading right, are tested for impairment either individually or at the cash generating unit level, as appropriate when circumstances indicate that the intangible asset may be impaired.



Impairment loss is recognized in profit or loss for the amount by which the asset's or CGU's carrying amount exceeds its recoverable amount which is the higher of its fair value less costs to sell and its value in use. The fair value less costs to sell is the amount obtainable from the sale of an asset in an arm's length transaction, while in determining value in use management estimates the expected future cash flows to be generated from the continued use of the asset or CGU, and determines the suitable interest rate in order to calculate the present value of those cash flows. The data used for impairment testing procedures are directly linked to the Group's latest approved budget, adjusted as necessary to exclude the effects of asset enhancements.

Discount factors are determined individually for each CGU and reflect management's assessment of respective risk profiles, such as market and asset-specific risk factors.

All assets, except for intangible assets with indefinite useful life, are subsequently reassessed for indications that an impairment loss previously recognized may no longer exist. An impairment loss is reversed if the asset's or CGU's recoverable amount exceeds its carrying amount.

### 2.19 Employee Benefits

Entities under the Group provide respective post-employment benefits to employees through a defined benefit plan and defined contribution plan, as well as other benefits, which are recognized and measured as follows:

#### (a) Post-employment Defined Benefit Plan

A defined benefit plan is a post-employment plan that defines an amount of post-employment benefit that an employee will receive on retirement, usually dependent on one or more factors such as age, years of service and salary. The legal obligation for any benefits from this kind of post-employment plan remains with the Group, even if plan assets for funding the defined benefit plan have been acquired. Plan assets may include assets specifically designated to a long-term benefit fund, as well as qualifying insurance policies. The Group's post-employment defined benefit plan covers all regular full-time employees. The pension plan is tax-qualified, non-contributory and administered by trustees.

The liability recognized in the statement of financial position for defined benefit post-employment plan is the present value of the defined benefit obligation at the end of the reporting period less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows for expected benefit payments using a discount rate derived from the interpolated yields of government bonds as calculated by Bloomberg which used Bloomberg Valuation (BVAL) Evaluated Pricing Service to calculate the PHP BVAL Reference Rates. These yields are denominated in the currency in which the benefits will be paid and that have terms to maturity approximating to the terms of the related post-employment liability.

Remeasurements, comprising of actuarial gains and losses arising from experience adjustments and other changes in actuarial assumptions, effect of the changes to the asset ceiling, if any, and actual return on plan assets (excluding amount included in net interest), are reflected immediately in the statement of financial position with a charge or credit recognized in other comprehensive income in the period in which they arise. Remeasurements are not reclassified to profit or loss in the subsequent periods.

Net interest is calculated by applying the discount rate at the beginning of the period, taking account of any changes in the net defined benefit liability or asset during the period as a result of contributions and benefit payments. Net interest is reported as part of Other Interest Income or Expense account in the statement of profit or loss.

Past-service costs are recognized immediately in profit or loss in the period of a plan amendment or curtailment.

#### (b) Post-employment Defined Contribution Plan

A defined contribution plan is a post-employment plan under which the Group pays fixed contributions into an independent entity such as the Social Security System. The Group has no legal or constructive obligations to pay further contributions after payment of the fixed contribution. The contributions recognized in respect of defined contribution plans are expensed as they fall due. Liabilities or assets may be recognized if underpayment or prepayment has occurred.

#### (c) Short-term Benefits

Short-term employee benefits include wages, salaries, bonuses, and non-monetary benefits provided to current employees, which are expected to be settled before twelve months after the end of the reporting period during which an employee services are rendered, but does not include termination benefits. The undiscounted amount of the benefits expected to be paid in respect of services rendered by employees in an accounting period is recognized in profit or loss during that period and any unsettled amount at the end of the reporting period is included as part of Accrued Interest, Taxes and Other Expenses in the statement of financial position.

#### (d) Termination Benefits

Termination benefits are payable when employment is terminated by the Group before the normal retirement date, or whenever an employee accepts voluntary redundancy in exchange for these benefits. The Group recognizes termination benefits at the earlier of: (i) when it can no longer withdraw the offer of such benefits, and, (ii) when it recognizes costs for a restructuring that is within the scope of PAS 37, *Provisions, Contingent Liabilities and Contingent Assets*, and involves the payment of termination benefits. In the case of an offer made to encourage voluntary redundancy, the termination benefits are measured based on the number of employees expected to accept the offer. Benefits falling due more than 12 months after the end of the reporting period are discounted to their present value.

#### (e) Bonus Plans

The Group recognizes a liability and an expense for bonuses, based on a fixed formula. The Group recognizes a provision where it is contractually obliged to pay the benefits, or where there is a past practice that has created a constructive obligation.

#### (f) Compensated Absences

Compensated absences are recognized for the number of paid leave days (including holiday entitlement) remaining at the end of the reporting period. They are included in the Accrued Interest, Taxes and Other Expenses account in the statement of financial position at the undiscounted amount that the Group expects to pay as a result of the unused entitlement.

## 2.20 Borrowing Costs

Borrowing costs are recognized as expense in the period in which they are incurred, except to the extent that they are capitalized. Borrowing costs that are directly attributable to the acquisition, construction or production of a qualifying asset (i.e., an asset that takes a substantial period of time to get ready for its intended use or sale) are capitalized as part of the cost of such asset. The capitalization of borrowing costs commences when expenditures for the asset and borrowing costs are being incurred and activities that are necessary to prepare the asset for its intended use or sale are in progress. Capitalization ceases when substantially all such activities are completed.

Investment income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing costs eligible for capitalization.

## 2.21 Income Taxes

Tax expense recognized in profit or loss comprises the sum of current tax and deferred tax not recognized in other comprehensive income or directly in equity, if any.

Current tax assets or liabilities comprise those claims from, or obligations to, tax authorities relating to the current or prior reporting period, that are unpaid at the end of the reporting period. They are calculated according to the tax rates and tax laws applicable to the periods to which they relate, based on the taxable profit for the year. All changes to current tax assets or liabilities are recognized as a component of tax expense in the statement of profit or loss.

Deferred tax is provided using the liability method, on temporary differences at the end of the reporting period between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes. Under the liability method, with certain exceptions, deferred tax liabilities are recognized for all taxable temporary differences and deferred tax assets are recognized for all deductible temporary differences and the carry-forward of unused tax losses and unused tax credits to the extent that it is probable that taxable profit will be available against which the deferred tax assets can be utilized. Deferred tax assets are reassessed at the end of each reporting period. Previously unrecognized deferred tax assets are recognized to the extent that it has become probable that future taxable profit will be available to allow such deferred tax assets to be recovered.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the period when the asset is realized or the liability is settled provided such tax rates have been enacted or substantively enacted at the end of the reporting period.

The carrying amount of deferred tax assets is reviewed at the end of each reporting period and reduced to the extent that it is probable that sufficient taxable profit will be available to allow all or part of the deferred tax assets to be utilized.

The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Group expects, at the end of the reporting period, to recover or settle the carrying amount of the assets and liabilities.

Most changes in deferred tax assets or liabilities are recognized as a component of tax expense in profit or loss, except to the extent that it relates to items recognized in other comprehensive income or directly in equity. In this case, the tax is also recognized in other comprehensive income or directly in equity, respectively.

Deferred tax assets and deferred tax liabilities recognized by the entities under the Group are offset if they have a legally enforceable right to set off current tax assets against current tax liabilities and the deferred taxes relate to the same entity and the same taxation authority.

## 2.22 Related Party Relationships and Transactions

Related party transactions are transfers of resources, services or obligations between the Group and its related parties, regardless of whether a price is charged.

Parties are considered to be related if one party has the ability to control the other party or exercise significant influence over the other party in making financial and operating decisions. These parties include: (a) individuals owning, directly or indirectly through one or more intermediaries, control or are controlled by, or under common control with the Group (b) associates; (c) individuals owning, directly or indirectly, an interest in the voting power of the Group that gives them significant influence over the Group and close members of the family of any such individual; and, (d) the funded retirement plan of each of the entities under the Group.

In considering each possible related party relationship, attention is directed to the substance of the relationship and not merely on the legal form.

All material related party transactions shall be approved by at least two-thirds vote of the BOD, with at least a majority of the independent directors voting to approve the material related party transactions. In case that a majority of the independent directors' is not secured, the material related party transaction may be ratified by the vote of the stockholders representing at least two-thirds of the outstanding capital stock.

Transactions amounting to 10% or more of the consolidated total assets based on the latest audited consolidated financial statements entered into with related parties are considered material.

## 2.23 Earnings and Dilutive Earning Per Share

Basic earnings per share (EPS) is determined by dividing the adjusted net profit for the year attributable to common shareholders by the weighted average number of common stocks outstanding during the period, after giving retroactive effect to any stock dividends declared in the current period.

Diluted EPS is also computed by dividing net profit by the weighted average number of common stocks subscribed and issued during the period. However, net profit attributable to common stocks and the weighted average number of common stocks outstanding are adjusted to reflect the effects of potentially dilutive convertible preferred stocks. Convertible preferred stocks are deemed to have been converted into common stocks at the issuance of preferred stocks.

In cases of redemption of preference shares, the net income used in the computation of basic and diluted EPS is decreased by the excess of the fair value of consideration paid to holders of the instruments over the carrying amount of such repurchased the instruments.

### 2.24 Trust and Fiduciary Activities

The Group commonly acts as trustee and in other fiduciary capacities that result in the holding or placing of assets on behalf of individuals, trusts, retirement benefit plans and other institutions. The resources, liabilities and income or loss arising thereon are excluded from these financial statements, as these are neither resources nor income of the Group.

### 2.25 Events After the End of the Reporting Period

Any post year-end event that provides additional information about the Group's financial position at the end of the reporting period (adjusting event) is reflected in the financial statements. Post year-end events that are not adjusting events, if any, are disclosed when material to the financial statements.

## 3. SIGNIFICANT ACCOUNTING JUDGMENTS AND ESTIMATES

The preparation of the Group's financial statements in accordance with PFRS requires management to make judgments and estimates that affect the amounts reported in the financial statements and related notes. Judgments and estimates are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. Actual results may ultimately vary from these estimates.

### 3.1 Critical Management Judgments in Applying Accounting Policies

In the process of applying the Group's accounting policies, management has made the following judgments, apart from those involving estimation, which have the most significant effect on the amounts recognized in the financial statements:

#### (a) Determination of Lease Term of Contracts with Renewal and Termination Options (2019)

In determining the lease term, management considers all relevant factors and circumstances that create an economic incentive to exercise a renewal option or not exercise a termination option. Renewal options and/or periods after termination options are only included in the lease term if the lease is reasonably certain to be extended or not terminated.

For leases of offices and branches, the factors that are normally the most relevant are (a) if there are significant penalties should the Group pre-terminate the contract, and (b) if any leasehold improvements are expected to have a significant remaining value, the Group is reasonably certain to extend and not to terminate the lease contract.

The Group did not include renewal options as part of the lease term as the terms are renewable upon mutual agreement.

The lease term is reassessed if an option is actually exercised or not exercised or the Group becomes obliged to exercise or not exercise it. The assessment of reasonable certainty is only revised if a significant event or a significant change in circumstances occurs, which affects this assessment, and that is within the control of the Group.

#### (b) Application of ECL to Financial Assets at Amortized Cost and Financial Assets at FVOCI

The Group uses the general approach to calculate ECL for all debt instruments carried at amortized cost and FVOCI, together with loan commitments and financial guarantee contracts. The allowance for impairment is based on the ECLs associated with the probability of default of a financial instrument in the next 12 months, unless there has been a significant increase in credit risk since origination of the financial instrument, in such case, a lifetime ECL for the instrument is recognized.

The Group has established a policy to perform an assessment, at the end of each reporting period, whether a financial instrument's credit risk has increased significantly since initial recognition, by considering the change in the risk of default occurring over the remaining life of the financial instrument.

#### (c) Evaluation of Business Models Applied in Managing Financial Instruments

The Group manages its financial assets based on business models that maintain adequate level of financial assets to match its expected cash outflows, largely, its core deposit funding arising from customers' withdrawals and continuing loan disbursements to borrowers, while maintaining a strategic portfolio of financial assets for trading activities consistent with its risk appetite.

The Group's business models reflect how it manages its portfolio of financial instruments. The Group's business models need not be assessed at entity level or as a whole but applied at the level of a portfolio of financial instruments (i.e., group of financial instruments that are managed together by the Group) and not on an instrument-by-instrument basis (i.e., not based on intention or specific characteristics of individual financial instrument).

In determining the classification of a financial instrument, the Group evaluates in which business model a financial instrument or a portfolio of financial instruments belongs to taking into consideration the objectives of each business model established by the Group (e.g., held-for-trading, generating accrual income, direct matching to a specific liability) as those relate to the Group's investment, trading and lending strategies.

If more than an infrequent sale is made out of a portfolio of financial assets carried at amortized cost, an entity should assess whether and how such sales are consistent with the objective of collecting contractual cash flows. In making this judgment, the Group considers certain circumstances documented in its business model manual to assess that an increase in the frequency or value of sales of financial instruments in a particular period is not necessarily inconsistent with the HTC business model if the Group can explain the reasons for those sales and why those sales do not reflect a change in the Group's objective for the business model.

In 2019 and 2018, the Parent Company disposed of certain debt securities from its HTC portfolio in accordance with its investment policy and has applied these evaluation process to ensure that the disposal is consistent with the Group's HTC business model (see Note 10.3).

*(b) Testing the Cash Flow Characteristics of Financial Assets and Continuing Evaluation of the Business Model*

In determining the classification of financial assets, the Group assesses whether the contractual terms of the financial assets give rise on specified dates to cash flows that are SPPI on the principal outstanding, with interest representing time value of money and credit risk associated with the principal amount outstanding. The assessment as to whether the cash flows meet the test is made in the currency in which the financial asset is denominated. Any other contractual term that changes the timing or amount of cash flows (unless it is a variable interest rate that represents time value of money and credit risk) does not meet the amortized cost criteria. In cases where the relationship between the passage of time and the interest rate of the financial instrument may be imperfect, known as modified time value of money, the Group assesses the modified time value of money feature to determine whether the financial instrument still meets the SPPI criterion. The objective of the assessment is to determine how different the undiscounted contractual cash flows could be from the undiscounted cash flows that would arise if the time value of money element was not modified (the benchmark cash flows).

If the resulting difference is significant, the SPPI criterion is not met. In view of this, the Group considers the effect of the modified time value of money element in each reporting period and cumulatively over the life of the financial instrument.

*(c) Determination of Timing of Satisfaction of Performance Obligation*

The Group determines that its revenue shall be recognized at a point in time for loan syndication and underwriting fees and commission. In making its judgment, the Group considers the timing of receipt and consumption of benefits provided by the Company to the customers. The services provided by the Company would need substantial reperformance from other entities. This demonstrates that the customers does not simultaneously receive and consume the benefits provided by the Group.

*(d) Distinction Between Investment Properties and Owner-occupied Properties*

The Group determines whether a property qualifies as an investment property. In making its judgment, the Group considers whether the property generates cash flows largely independent of the other assets held by the Group. Owner-occupied properties generate cash flows that are attributable not only to property but also to other assets used in the production, supply process, and in the Group's banking operation.

Some properties comprise a portion that is held to earn rental or for capital appreciation and another portion that is held for use for administrative purposes. If these portions can be sold separately (or leased out separately under finance lease) then these portions can be accounted for separately. If the portions cannot be sold separately, the property is accounted for as investment property only if an insignificant portion is held for use in operations or for administrative purposes. Judgment is applied in determining whether ancillary services are so significant that a property does not qualify as investment property.

As of the end of the reporting period, the Group has a certain building which comprise a portion that is held for rental and other portion is used for operations which were classified by the Group as Investment Property or as part of Bank Premises, Furniture, Fixtures and Equipment according to its current use.

*(e) Distinction Between Operating and Finance Leases where the Group is the Lessor*

The Group has entered into various lease agreements either as a lessor or a lessee. Judgment was exercised by management to distinguish each lease agreement as either an operating or finance lease by looking at the transfer or retention of significant risk and rewards of ownership of the properties covered by the agreements. Failure to make the right judgment will result in either overstatement or understatement of assets or liabilities.

In determining whether the lease arrangements of RCBC LFC qualify as a finance lease, the following factors have been considered:

- (i)* the lease provides the lessee an option to purchase the asset; or,
- (ii)* the lease transfers ownership of the property at the end of the lease and the related lease terms approximate the estimate useful life of the asset being leased.

*(f) Classification and Determination of Fair Value of Acquired Properties*

The Group classifies its acquired properties as Bank Premises, Furniture, Fixtures and Equipment if used in operations, as Assets Held-for-Sale and Disposal Group presented under Other Resources account if the Group expects that the assets will be sold within one year from the date of recognition, as Investment Properties if held for rental or for currently undetermined future use and is regarded as held for capital appreciation, or as financial assets. At initial recognition, the Group determines the fair value of acquired properties through internal and external appraisal depending on the Group's threshold policy. The appraised value is determined based on the current economic and market conditions, as well as the physical condition of the property.

The Group's methodology in determining the fair value of acquired properties are further discussed in Note 7.4.

*(g) Assessment of Significant Influence on HCPI in which the Group and the Parent Company Holds Less than 20% Ownership*

The management considers that the Group and the Parent Company have significant influence on HCPI even though it holds less than 20% of the ordinary shares in the latter. In making this judgment, management considered the Group's and the Parent Company's rights to commit and undertake to vote, and to regulate the conduct of voting and the relationship between them with respect to their exercise of their voting rights (see Note 12.2).

*(h) Recognition of Provisions and Contingencies*

Judgment is exercised by management to distinguish between provisions and contingencies. Policies on recognition of provisions and contingencies are discussed in Note 2.13 and relevant disclosures are presented in Note 29. In dealing with the Group's various legal proceedings, the Group's estimate of the probable costs that may arise from claims and contingencies has been developed in consultation and coordination with the Group's internal and outside counsels acting in defense for the Group and the Parent Company's legal cases and are based upon the analysis of probable results.



Although the Group does not believe that its on-going proceedings, as disclosed in Note 29, will have material adverse effect on the Group's financial position, it is possible that future results of operations could be materially affected by changes in the estimates or in the effectiveness of the strategies conducted relating to those proceedings.

(i) *Common Control Business Combination*

The management considers the merger between RCBC and RSB as common control business combination because there was no change in control, the ultimate controlling party, which is RCBC, has control over the combined resources. The ultimate controlling party basically combined its resources; hence, a business combination without commercial substance. The common control business combination between RCBC and RSB was accounted as using pooling of interest method [see Notes 1.3, 2.1(b), 23 and 34].

**3.2 Key Sources of Estimation Uncertainty**

The following are the key assumptions concerning the future, and other key sources of estimation uncertainty at the end of each reporting period, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next reporting period:

(a) *Determination of Appropriate Discount Rate in Measuring Lease Liabilities (2019)*

The Group measures its lease liabilities at present value of the lease payments that are not paid at the commencement date of the lease contract. The lease payments were discounted using a reasonable rate deemed by management equal to the Group's incremental borrowing rate. In determining a reasonable discount rate, management considers the term of the leases, the underlying asset and the economic environment. Actual results, however, may vary due to changes in estimates brought about by changes in such factors.

(b) *Expectations of Expected Credit Losses*

When measuring allowance for ECL for relevant categories of financial assets, management applies judgment in assessing whether a financial asset has experienced SICR since initial recognition, and in the estimation of the contractual cash flows due from counterparty and those that the Group management considers the merger between RCBC and RSB as common control business combination because there was no change in the ultimate controlling party, which is RCBC, has control over the combined resources. The ultimate controlling party basically combined its resources and, hence, a business combination without commercial substance. The common control business combination between RCBC and RSB was accounted as using pooling of interest method [see Notes 1.3, 2.1(b), 23 and 34].

**3.2 Key Sources of Estimation Uncertainty**

Each of the above factors may result in different levels of loss allowance.

The following are the key assumptions concerning the future, and other key sources of estimation uncertainty at the end of each reporting period, that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next reporting period:

Significant factors affecting the estimates on the ECL model include:

- internal rating matrix which determines the PD to be assigned to a financial asset;
- criteria for assessing if there has been an SICR and when a financial asset will be transferred between the three stages;
- the Group's definition of default for different segments of credit exposures that considers the regulatory requirements;
- establishing groups of similar financial assets (i.e., segmentation) for the purposes of measuring ECL on a collective basis;
- establishment of LGD parameters based on historical recovery rates of claims against defaulted counterparties across different group of financial instruments; and,
- establishing the number and relative weightings of forward-looking scenarios for each type of product/market and the associated ECL.

The explanation of inputs, assumptions and estimation techniques used in measuring ECL and the analysis of the allowance for ECL on various groups of financial instruments is further discussed in Note 4.4.

(c) *Fair Value Measurement for Financial Assets at FVTPL and at FVOCI*

The Group carries certain financial assets at fair value which requires judgment and extensive use of accounting estimates. In cases when active market quotes are not available, fair value is determined by reference to the current market value of another financial instrument which is substantially the same or is calculated based on the expected cash flows of the underlying net base of the instrument or other more appropriated valuation techniques (see Note 7.2).

The amount of changes in fair value would differ if the Group had utilized different valuation methods and assumptions. Any change in fair value of the financial assets and financial liabilities would affect profit or loss or other comprehensive income.

The fair value of derivative financial instruments that are not quoted in an active market is determined through valuation techniques using the net present value computation (see Note 7.2).

The carrying values of the Group and the Parent Company's trading and investment securities and the amounts of fair value changes recognized on those financial assets are disclosed in Note 10.

(d) *Estimation of Useful Lives of Bank Premises, Furniture, Fixtures and Equipment, Right-of-use Assets, Investment Properties, Computer Software, Goodwill, Branch Licenses and Trading Rights*

The Group estimates the useful lives of bank premises, furniture, fixtures and equipment, right-of-use assets, investment properties and computer software based on the period over which the assets are expected to be available for use. The estimated useful lives of these assets are reviewed periodically and are updated if expectations differ from previous estimates due to physical wear and tear, technical or commercial obsolescence and legal or other limits on the use of the assets.

The Group's goodwill, branch licenses and trading rights were regarded as having an indefinite useful lives considering there is no foreseeable limit to the period over which such assets are expected to generate net cash inflows for the Group. The assessment of having indefinite useful lives is reviewed periodically and is updated whether events and circumstances such as the period of control over these assets and legal or similar limits on the use of these assets continue to support such assessment.

The carrying amounts of bank premises, furniture, fixtures and equipment, including right-of-use assets, investment properties and computer software are analyzed in Notes 13, 14 and 15, respectively, while the carrying amounts of goodwill, branch licenses and trading rights are analyzed in Note 15. Based on management's assessment as of December 31, 2019 and 2018, there are no changes in the useful lives of these assets. Actual results, however, may vary due to changes in estimates brought about by changes in factors mentioned above.

(e) *Determination of Realizable Amount of Deferred Tax Assets*

The Group reviews its deferred tax assets at the end of each reporting period and reduces the carrying amount to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred tax asset to be utilized. Significant judgment is applied by management to determine the amount of deferred tax assets that can be recognized based on the likely timing and level of the Group's future taxable income together with its future tax planning strategies. The Group assessed its projected performance in determining the sufficiency of the future taxable income to support the recognition of deferred tax assets.

The carrying values of recognized and unrecognized deferred tax assets as of December 31, 2019 and 2018 are disclosed in Note 26.1.

(f) *Estimation of Impairment Losses of Non-financial Assets*

Except for intangible assets with indefinite useful lives, PFRS requires that an impairment review be performed when certain impairment indications are present. The Group's policy on estimating the impairment of non-financial assets is discussed in detail in Note 2.18.

The Group assesses impairment on these non-financial assets and considers the following important indicators:

- significant changes in asset usage;
- significant decline in assets' market value;
- obsolescence or physical damage of an asset;
- significant underperformance relative to expected historical or projected future operating results;
- significant changes in the manner of usage of the acquired assets or the strategy for the Group's overall business; and,
- significant negative industry or economic trends.

If such indications are present and where the carrying amount of the asset exceeds its recoverable amount, the asset is considered impaired and is written down to its recoverable amount. Though management believes that the assumptions used in the estimation of fair values of non-financial assets are appropriate and reasonable, significant changes in these assumptions may materially affect the assessment of recoverable values and any resulting impairment loss could have a material adverse effect on the results of operations.

(g) *Determination of Fair Value of Investment Properties*

The Group's investment properties are composed of parcels of land, buildings and condominium units which are held for capital appreciation or held-for-lease, and are measured using cost model. The estimated fair value of investment properties disclosed in Note 7.4 is determined by either an independent or internal appraiser on the basis of current appraised values of the properties or similar properties in the same location and condition.

For investment properties with appraisal conducted prior to the end of the current reporting period, management determines whether there are significant circumstances during the intervening period that may require adjustments or changes in the disclosure of fair value of those properties.

A significant change in key inputs and sources of information used in the determination of the fair value disclosed for those assets may result in adjustment in the carrying amount of the assets reported in the financial statements if their fair value will indicate evidence of impairment.

(h) *Valuation of Post-employment Defined Benefits*

The determination of the Group's obligation and cost of post-employment defined benefits is dependent on the selection of certain assumptions used by actuaries in calculating such amounts. Those assumptions include, among others, discount rates, and salary increase rate. A significant change in any of these actuarial assumptions may generally affect the recognized expense, other comprehensive income or loss, and the carrying amount of the post-employment benefit obligation in the next reporting period.

The amounts of post-employment benefit obligation and related income or expense, and an analysis of the movements in the estimated present value of post-employment benefit obligation, as well as the significant assumptions used in estimating such obligation, are presented in Note 24.2.

#### 4. RISK MANAGEMENT POLICIES AND OBJECTIVES

The Group is exposed to risks in relation to its operating, investing, and financing activities, and the business environment in which it operates. The Group's objectives in risk management are to ensure that it identifies, measures, monitors, and controls the various risks that arise from its business activities, and that it adheres strictly to the policies, procedures, and control systems which are established to address these risks.

A committee system is a fundamental part of the Group's process of managing risk. The following five committees of the Parent Company's BOD are relevant in this context:

- The Executive Committee, which meets weekly, has the power to act and pass upon such matters as the Board may entrust to it for action in between BOD meetings. It may also consider and approve loans and other credit related matters, investments, purchase of shares of stock, bonds, securities and other commercial papers for the Bank's portfolio. The Executive Committee also has the power to review an asset or loan to ensure timely resolution and recognition of losses of impaired assets.
- The Risk Oversight Committee (ROC), which meets monthly, carries out the BOD's oversight responsibility for Group's capital adequacy and risk management strategy and actions covering credit, market and operational risks under Pillar I of the Basel framework; as well as the management of other material risks determined under Pillar II and the Internal Capital Adequacy Assessment Process (ICAAP) (see Note 5.2). Risk limits are reviewed and approved by the ROC.
- The Audit and Compliance Committee (ACC), which meets monthly, reviews the results of the Internal Audit examinations and recommends remedial actions to the BOD as appropriate. The ACC also performs oversight functions over the Regulatory Affairs Group on matters such as compliance risk assessment, annual testing work plan, compliance breaches, and other regulatory issues.
- The Related Party Transactions (RPT) Committee, which meets monthly and as necessary, reviews proposed RPT within the materiality threshold to determine whether or not the transaction is on terms no less favorable to the Group than terms available to any unconnected third party under the same or similar circumstances. On favorable review, the RPT Committee endorses transactions to the BOD for approval.
- The Anti-Money Laundering (AML) Board Committee, which meets monthly, oversees the implementation of the Bank's Money Laundering and Terrorist Financing Prevention Program (MTPP) and ensures that ML/TF risks are effectively managed. This Committee also ensures that infractions are immediately corrected, issues are addressed and AML training of directors, officers, and staff are regularly conducted.

Four senior management committees also provide a regular forum to take up risk issues.

- The Credit and Collection Committee (CRECOL), chaired by the Chief Executive Officer (CEO) and composed of the heads of credit risk-taking business units and the head of credit management group, meets weekly to review and approve credit exposures within its authority. It also reviews plans and progress on the resolution of problem loan accounts.

- The Asset/Liability Committee (ALCO), chaired by the Treasurer of the Parent Company and with the participation of the CEO and key business and support unit heads meets weekly to appraise market trends, and economic and political developments. It provides direction in the management of interest rate risk, liquidity risk, foreign currency risk, and trading and investment portfolio decisions. It sets prices or rates for various asset and liability and trading products, in light of funding costs and competitive and other market conditions. It receives confirmation that market risk limits (as described in the succeeding pages) are not breached; or if breached, it provides guidance on the handling of the relevant risk exposure in between ROC meetings.
- The Related Party Transactions Management Committee (RPT ManCom), composed of the Group Heads of the business units as specified in the charter or their respective designates. It meets monthly to review and approve proposed RPT within the materiality threshold for the purpose of determining whether or not the transaction is on terms no less favorable to the Bank than terms available to any unconnected third party under the same or similar circumstances unless the transaction requires BOD approval. On favorable review, the RPT ManCom endorses the transaction for BOD confirmation.
- The Anti-Money Laundering Management Committee (AMLCom), which meets weekly, evaluates the unusual/suspicious transaction reported by the different bank units to determine the filing of Suspicious Transaction Reports (STRs) to the Anti-Money Laundering Council (AMLC).

The AMLCom is composed of the Chief Compliance Officer as the Chairperson and Presiding Officer and the Heads of Operations Group, Retail Banking Group, Controllershship Group, Legal Affairs Group, Operational Risk Management Division, Legal Affairs Division as members, and AML Monitoring and Reporting Division (AMRD) as the Rapporteur. The AMRD, through the Chief Compliance Officer, reports to the AML Board Committee its monthly activities including the results of the AMLCom meetings.

The Parent Company established a Risk Management Group, headed by the Chief Risk Officer, to ensure that consistent implementation of the objectives of risk identification, measurement and/or assessment, mitigation, and monitoring are pursued via practices commensurate with the group-wide risk profile.

In addition to established risk management systems and controls, the Group holds capital commensurate with the levels of risk it undertakes (see Note 5), in accordance with regulatory capital standards and internal benchmarks set by the Parent Company's BOD.

#### 4.1 Group's Strategy in Using Financial Instruments

It is the Group's intent to generate returns mainly from the traditional financial intermediation and service-provision activities, augmented by returns from positions based on views on the financial markets. The main source of risk, therefore, remains to be that arising from credit risk exposures. Nevertheless, within BSP regulatory constraints, and subject to limits and parameters established by the BOD and/or the ROC, the Group is exposed to liquidity risk and interest rate risk inherent in the Group's operations, and other market risks, which include foreign exchange risk.

In the course of performing financial intermediation function, the Group accepts deposits from customers at fixed and floating rates, and for various periods, and seeks to earn interest margins by investing these funds in high-quality assets. The conventional strategy to enhance net interest margin is the investment of short-term funds in longer-term assets, such as fixed-income securities. While, in doing so, the Group maintains liquidity at prudent levels to meet all claims that fall due, the Group fully recognizes the consequent interest rate risk exposure.

The Group's investment portfolio is composed mainly of marketable, sovereign and corporate debt instruments.

The Parent Company was granted by the BSP additional derivatives authorities effective January 2011. Products approved under the Limited Dealer Authority (Type 2) are foreign currency forwards, non-deliverable forwards, interest rate and cross currency swaps while credit-linked notes and bond options were approved under the Limited User Authority (Type 3). In February 2012, bond forwards, non-deliverable swaps and foreign exchange options have been included under the same Limited User Authority (Type 3). In June 2013, the Parent Company was granted a Type 2 license non-deliverable swaps, foreign currency options, bond and interest rate options, and asset swaps. During the same period, additional Type 3 licenses for foreign exchange-option and bond-option linked notes were likewise approved. The Parent Company's derivatives portfolio consists mostly of short-term currency forward contracts and swaps, and interest rate swaps and futures.

#### 4.2 Liquidity Risk

Liquidity risk refers to current and prospective risk to earnings or capital arising from a bank's inability to meet its obligations when they come due without incurring unacceptable losses or costs. Liquidity risk includes the inability to manage unplanned decreases or changes in funding sources. The Group manages liquidity risk by limiting the maturity mismatch between assets and liabilities, and by holding sufficient liquid assets of appropriate quality and marketability.

The Group recognizes the liquidity risk inherent in its activities, and identifies, measures, monitors and controls the liquidity risk inherent to the members of the Group which are financial intermediaries.

The Group's liquidity policy is to manage its operations to ensure that funds available are more than adequate to meet demands of its customers and to enable deposits to be repaid on maturity. The Group's liquidity policies and procedures are set out in its funding and liquidity plan which contains certain funding requirements based on assumptions and uses resources and liability maturity gap analysis.

The Group uses Maximum Cumulative Outflow (MCO) model to measure liquidity risk arising from mismatches of assets and liabilities. MCO is a liquidity gap tool to project cash flow expectations on a status quo condition.

The MCO is generated by distributing the cash flows of the Group's assets, liabilities and off-balance sheet items to time buckets based cash flow expectations such as contractual maturity, nature of the account, behavioral patterns, projections on business strategies, and/or optionality of certain products.

The incorporation of behavioral cash flow assumptions and business projections or targets results in a dynamic gap report which realistically captures the behavior of the products and creates a forward-looking cash flow projection.

The Group monitors MCO regularly to ensure that it remains within the set limits. The Parent Company generates and monitors daily its MCO. The subsidiaries generate at least monthly their respective MCO reports. The liquidity profile of the Group is reported monthly to the Parent Company's ROC. To supplement the status quo scenario parameters reflected in the MCO report, the Group also conducts liquidity stress testing to determine the impact of extreme factors, scenarios and events to the Group's liquidity profile.

The gap analyses as of December 31, 2019 and 2018 are presented below.

	<b>Group 2019</b>					
	<b>One to Three Months</b>	<b>Three Months to One Year</b>	<b>One to Five Years</b>	<b>More than Five Years</b>	<b>Non-maturity</b>	<b>Total</b>
<b>Resources:</b>						
Cash and cash equivalents	P 83,728	P 2,935	P 2,014	P -	P 58,874	P 147,551
Investments - net	81,467	3,965	38,843	35,077	1,367	160,719
Loans and receivables - net	27,376	73,230	110,665	97,738	121,407	430,416
Other resources - net	103	127	298	100	27,765	28,393
Total resources	<u>P 192,674</u>	<u>P 80,257</u>	<u>P 151,820</u>	<u>P 132,915</u>	<u>P 209,413</u>	<u>P 767,079</u>
<b>Liabilities:</b>						
Deposit liabilities	54,793	28,183	20,933	3	352,669	456,581
Bills payable	75,139	-	18,919	7,546	2	101,606
Bonds payable	12,304	15,000	69,510	-	-	96,814
Other liabilities	950	27	-	-	28,251	29,228
Total liabilities	143,186	43,210	109,362	7,549	380,922	684,229
<b>Equity</b>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>82,850</u>	<u>82,850</u>
Total liabilities and equity	<u>143,186</u>	<u>43,210</u>	<u>109,362</u>	<u>7,549</u>	<u>463,772</u>	<u>767,079</u>
<b>On-book gap</b>	<u>49,488</u>	<u>37,047</u>	<u>42,458</u>	<u>125,366</u>	<u>(254,359)</u>	<u>-</u>
<b>Cumulative on-book gap</b>	<u>49,488</u>	<u>86,535</u>	<u>128,993</u>	<u>254,359</u>	<u>-</u>	<u>-</u>
Contingent resources	18,088	-	-	-	-	18,088
Contingent liabilities	24,141	-	-	-	-	24,141
<b>Off-book gap</b>	<u>(6,053)</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>(6,053)</u>
<b>Cumulative off-book gap</b>	<u>(6,053)</u>	<u>(6,053)</u>	<u>(6,053)</u>	<u>(6,053)</u>	<u>(6,053)</u>	<u>-</u>
<b>Periodic gap</b>	<u>43,435</u>	<u>37,047</u>	<u>42,458</u>	<u>125,366</u>	<u>(254,359)</u>	<u>(6,053)</u>
<b>Cumulative total gap</b>	<u>P 43,435</u>	<u>P 80,482</u>	<u>P 122,940</u>	<u>P 248,306</u>	<u>(P 6,053)</u>	<u>P -</u>



	Group					
	2018					
	One to Three Months	Three Months to One Year	One to Five Years	More than Five Years	Non-maturity	Total
<b>Resources:</b>						
Cash and cash equivalents	P 51,696	P 1,389	P 2,171	P 756	P 57,771	P 113,783
Investments - net	19,248	5,112	26,288	60,665	7,559	118,872
Loans and receivables - net	25,743	63,353	102,472	98,146	99,064	388,778
Other resources - net	13,497	206	400	57	9,002	23,162
<b>Total resources</b>	<b>110,184</b>	<b>70,060</b>	<b>131,331</b>	<b>159,624</b>	<b>173,396</b>	<b>644,595</b>
<b>Liabilities:</b>						
Deposit liabilities	51,950	10,390	9,920	6,119	345,020	423,399
Bills payable	7,476	42,245	5,095	1,185	-	56,001
Bonds payable	-	-	53,090	-	-	53,090
Subordinated debt	-	-	-	9,986	-	9,986
Other liabilities	12,454	41	-	-	8,454	20,949
<b>Total liabilities</b>	<b>71,880</b>	<b>52,676</b>	<b>68,105</b>	<b>17,290</b>	<b>353,474</b>	<b>563,425</b>
<b>Equity</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>81,170</b>	<b>81,170</b>
<b>Total liabilities and equity</b>	<b>71,880</b>	<b>52,676</b>	<b>68,105</b>	<b>17,290</b>	<b>434,644</b>	<b>644,595</b>
On-book gap	38,304	17,384	63,226	142,334	(261,248)	-
Cumulative on-book gap	38,304	55,688	118,914	261,248	-	-
Contingent resources	15,844	-	-	-	-	15,844
Contingent liabilities	15,960	-	-	-	-	15,960
Off-book gap	(116)	-	-	-	-	(116)
Cumulative off-book gap	(116)	(116)	(116)	(116)	(116)	-
Periodic gap	38,188	17,384	63,226	142,334	(261,248)	(116)
Cumulative total gap	P 38,188	P 55,572	P 118,798	P 261,132	(P 116)	P -

	Parent Company					
	2019					
	One to Three Months	Three Months to One Year	One to Five Years	More than Five Years	Non-maturity	Total
<b>Resources:</b>						
Cash and cash equivalents	P 83,036	P 2,434	P 1,689	P -	P 58,610	P 145,769
Investments - net	80,354	3,965	38,843	33,717	565	157,444
Loans and receivables - net	25,609	72,058	104,816	97,619	122,580	422,682
Other resources - net	47	127	298	100	31,651	32,223
<b>Total resources</b>	<b>189,046</b>	<b>78,585</b>	<b>145,645</b>	<b>131,436</b>	<b>213,406</b>	<b>758,118</b>
<b>Liabilities:</b>						
Deposit liabilities	53,178	25,283	19,449	3	358,680	456,593
Bills payable	74,530	-	18,460	946	2	93,938
Bonds payable	12,304	15,000	69,510	-	-	96,814
Other liabilities	863	-	-	-	27,148	28,011
<b>Total liabilities</b>	<b>140,875</b>	<b>40,283</b>	<b>107,419</b>	<b>949</b>	<b>385,830</b>	<b>675,356</b>
<b>Equity</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>82,762</b>	<b>82,762</b>
<b>Total liabilities and equity</b>	<b>140,875</b>	<b>40,283</b>	<b>107,419</b>	<b>949</b>	<b>468,592</b>	<b>758,118</b>
<b>On-book gap</b>	<b>48,171</b>	<b>38,302</b>	<b>38,226</b>	<b>130,487</b>	<b>(255,186)</b>	<b>-</b>
<b>Cumulative on-book gap</b>	<b>48,171</b>	<b>86,473</b>	<b>124,699</b>	<b>255,186</b>	<b>-</b>	<b>-</b>
Contingent resources	17,955	-	-	-	-	17,955
Contingent liabilities	24,019	-	-	-	-	24,019
<b>Off-book gap</b>	<b>(6,064)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(6,064)</b>
<b>Cumulative off-book gap</b>	<b>(6,064)</b>	<b>(6,064)</b>	<b>(6,064)</b>	<b>(6,064)</b>	<b>(6,064)</b>	<b>-</b>
<b>Periodic gap</b>	<b>42,107</b>	<b>38,302</b>	<b>38,226</b>	<b>130,487</b>	<b>(255,186)</b>	<b>(6,064)</b>
<b>Cumulative total gap</b>	<b>P 42,107</b>	<b>P 80,409</b>	<b>P 118,635</b>	<b>P 249,122</b>	<b>(P 6,064)</b>	<b>P -</b>

		Parent Company					
		2018 (As restated)					
		One to	Three	One to	More	Non-maturity	Total
		Three	Months to	Five	than Five		
		Months	One Year	Years	Years		
<b>Resources:</b>							
Cash and cash equivalents	P	40,351	P 1,388	P 1,635	P 644	P 67,769	P 111,787
Investments - net		16,940	5,112	23,191	60,606	15,312	121,161
Loans and receivables - net		26,772	63,344	102,472	98,146	91,834	382,568
Other resources - net		13,516	194	385	31	6,565	20,691
<b>Total resources</b>		<b>97,579</b>	<b>70,038</b>	<b>127,683</b>	<b>159,427</b>	<b>181,480</b>	<b>636,207</b>
<b>Liabilities:</b>							
Deposit liabilities		53,518	10,763	11,890	3,580	343,778	423,529
Bills payable		4,988	368	33,386	10,017	-	48,759
Bonds payable		-	-	53,090	-	-	53,090
Subordinated debt		-	9,986	-	-	-	9,986
Other liabilities		12,098	18	-	-	7,652	19,768
<b>Total liabilities</b>		<b>70,604</b>	<b>21,135</b>	<b>98,366</b>	<b>13,597</b>	<b>351,430</b>	<b>555,132</b>
<b>Equity</b>		<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>81,075</b>	<b>81,075</b>
<b>Total liabilities and equity</b>		<b>70,604</b>	<b>21,135</b>	<b>98,366</b>	<b>13,597</b>	<b>432,505</b>	<b>636,207</b>
On-book gap		26,975	48,903	29,317	145,830	(251,025)	-
Cumulative on-book gap		26,975	75,878	105,195	251,025	-	-
Contingent resources		15,808	-	-	-	-	15,808
Contingent liabilities		15,912	-	-	-	-	15,912
Off-book gap	(	104)	-	-	-	-	(104)
Cumulative off-book gap	(	104)	(104)	(104)	(104)	(104)	-
Periodic gap		26,871	48,903	29,317	145,830	(251,025)	(104)
Cumulative total gap	P	26,871	P 75,774	P 105,091	P 250,921	(P 104)	P -

Pursuant to applicable BSP regulations, the Group is required to maintain reserves against deposit liabilities which are based on certain percentages of deposits. The required reserves against deposit liabilities shall be kept in the form of deposits placed in the Group's demand deposit accounts with the BSP. The BSP also requires the Parent Company to maintain asset cover of 100% for foreign currency-denominated liabilities of its FCDU.

#### 4.2.1 Foreign Currency Liquidity Management

The liquidity risk management policies and objectives described also apply to the management of any foreign currency to which the Group maintains significant exposure. Specifically, the Group ensures that its measurement, monitoring, and control systems account for these exposures as well. The Group sets and regularly reviews limits on the size of the cash flow mismatches for each significant individual currency and in aggregate over appropriate time horizons. The Group also assesses its access to foreign exchange markets when setting up its risk limits.

Following BSP Circular No. 639 on ICAAP, the Group likewise calculates and maintains a level of capital needed to support unexpected losses attributable to liquidity risk (see Note 5.2).

#### 4.2.2 Liquidity Risk Stress

To augment the effectiveness of the Group's gap analysis, the Group regularly assesses liquidity risk based on behavioral and hypothetical assumptions under stress conditions. Survivability and resilience of the Bank are assessed for a minimum stress period of 30 days for all crisis scenarios enumerated in BSP Circular 981: *Guidelines on Liquidity Risk Management*. The results of these liquidity stress simulations are reported monthly to ALCO and ROC.

#### 4.2.3 Liquidity Coverage Ratio and Net Stable Funding Ratio

On March 10, 2016, the BSP issued Circular No. 905, *Implementation of Basel III Framework on Liquidity Standards - Liquidity Coverage Ratio and Disclosure Standards*, which provides the implementing guidelines on liquidity coverage ratio (LCR) and disclosure standards that are consistent with the Basel III framework. The LCR is the ratio of high-quality liquid assets to total net cash outflows, which should not be lower than 100.00%. Compliance with the LCR minimum requirement commenced on January 1, 2018 with the prescribed minimum ratio of 90.00% for 2018 and 100.00% effective January 1, 2019.

To promote the short-term resilience of the liquidity risk profile, the Bank maintains adequate stock of unencumbered high-quality liquid assets (HQLAs) that consists of cash or assets that can be converted into cash at little or no loss of value in private markets, to meet its liquidity needs under stressed conditions. The stock of liquid assets should enable the Bank to withstand significant liquidity shocks for at least 30 calendar days, which would give time for corrective actions to be taken by the Bank management and/or the BSP. Details of the Group and Parent Company's LCR as of December 31, 2019 are summarized below.

	Group		Parent Company	
	Total Unweighted Value	Total Weighted Value	Total Unweighted Value	Total Weighted Value
Total stock of HQLA	P 177,859	P 170,908	P 175,084	P 168,288
Expected Net Cash Outflows*	860,119	120,016	858,411	115,270
Liquidity Coverage Ratio		<b>142.40%</b>		<b>145.99%</b>

\*Includes Restricted Term Deposits and Deposits pledged as collateral or under hold-out arrangements

Net Stable Funding Ratio (NSFR), as detailed in BSP Circular 1007, *Implementing Guidelines on the adoption of the Basel III Framework on Liquidity Standards - Net Stable Funding Ratio*, measures the availability of medium and long-term stable funding to support illiquid assets and business activities on an on-going basis. It is an assessment of the level of sustainable funding required to reduce funding risk over a one-year time horizon. The NSFR complements the LCR, which promotes short-term resilience of the Bank's liquidity profile.

To promote long-term resilience against liquidity risk, the Bank maintains a stable funding profile in relation to the composition of its assets and off-balance sheet activities and seeks to meet this objective by limiting overreliance on short-term wholesale funding and promoting enhanced assessment of funding risk across all on- and off-balance sheet accounts.

Details of the Group and Parent Company’s Basel III NSFR as of December 31, 2019 are summarized below.

	<u>Group</u>		<u>Parent Company</u>	
Available stable funding	P	466,447	P	462,545
Required stable funding		<u>420,616</u>		<u>409,585</u>
Basel III NSFR		<u><b>110.90%</b></u>		<u><b>112.93%</b></u>

The Bank has complied with the daily minimum regulatory requirement of 100% for both ratios beginning in 2019. For the Bank subsidiaries, per BSP Memo dated March 8, 2019, the observation period for LCR and NSFR was extended up to end-December 2019 to give sufficient time to build up liquidity position given the combined impact of these liquidity measures.

### 4.3 Market Risk

The Group’s exposure to market risk is the potential diminution of earnings arising from the adverse movement of market interest rates and foreign exchange rates, as well as the potential loss of market value, primarily of its holdings of foreign exchange currencies, debt securities and derivatives.

The market risks of the Group are: (a) foreign exchange risk, (b) interest rate risk and (c) equity price risk. The Group manages these risks via a process of identifying, analyzing, measuring and controlling relevant market risk factors, and establishing appropriate limits for the various exposures. The market risk metrics in use, each of which has a corresponding limit, include the following:

- Nominal Position – an open risk position that is held as of any point in time expressed in terms of the nominal amount of the exposure.
- Dollar Value of 01 (DV01) – an estimate of the price impact due to a one-basis point change in the yield of fixed income securities. It effectively captures both the nominal size of the portfolio as well as its duration. A given DV01 limit accommodates various combinations of portfolio nominal size and duration, thus providing a degree of flexibility to the trading/risk taking function, but at the same time represents a ceiling to the rate sensitivity of the exposure according to the Group’s risk appetite.
- Value-at-Risk (VaR) – an estimate of the amount of loss that a given risk exposure is unlikely to exceed during a given time period, at a given level of statistical confidence. Analytically, VaR is the product of: (a) the sensitivity of the market value of the position to movements of the relevant market risk factors, and (b) the volatility of the market risk factor for the given time horizon at a specified level of statistical confidence. Typically, the Group uses a 99% confidence level for this measurement. VaR is used as a risk measure for trading positions, which are marked-to-market (as opposed to exposures resulting from banking, or accrual, book resources and liabilities). Foreign Exchange Position VaR uses a one-day holding period, while Fixed Income VaR uses a defeasance period assessed periodically as appropriate to allow an orderly unwinding of the position. VaR models are back-tested to ensure that results remain consistent with the expectations based on the chosen statistical confidence level.

The Parent Company use VaR as an important tool for measuring market risk, they are cognizant of its limitations, notably the following:

- The use of historical data as a basis for determining the possible range of future outcomes may not always cover all possible scenarios, especially those of an exceptional nature.
- VaR is based on historical volatility. Future volatility may be different due to either random, one-time events or structural changes (including changes in correlation). VaR may be unable to capture volatility due to either of these.
- The holding period assumption may not be valid in all cases, such as during periods of extremely stressed market liquidity.
- VaR is, by definition, an estimate at a specified level of confidence. Losses may occur beyond VaR. A 99% VaR implies that losses can exceed VaR 1% of the time.
- In cases where a parametric distribution is assumed to calculate VaR, the assumed distribution may not fit the actual distribution well.
- VaR assumes a static position over the holding period. In reality, trading positions change, even during the trading day.

In addition to the limits corresponding to the above measurements, the following are also in place:

- Loss Limit – represents a ceiling on accumulated month-to-date and year-to-date losses. For trading positions, a Management Action Trigger (MAT) is also usually defined to be at 50% of the Loss Limit. When MAT is breached, the risk-taking unit must consult with ALCO for approval of a course of action moving forward.
- Product Limit – the nominal position exposure for certain specific financial instruments is established.

Stress Testing, which uses more severe rate/price volatility and/or holding period assumptions, (relative to those used for VaR) is applied to marked-to-market positions to arrive at “worst case” loss estimates. This supplements the VaR measure, in recognition of its limitations mentioned above.

A summary of the VaR position of the trading portfolios at December 31 is as follows:

	<u>Group</u>			
	<u>At December 31</u>	<u>Average</u>	<u>Maximum</u>	<u>Minimum</u>
<b>2019:</b>				
Foreign currency risk	P 72	P 34	P 88	P 10
Interest rate risk	<u>218</u>	<u>653</u>	<u>1,354</u>	<u>131</u>
Overall	<u><b>P 290</b></u>	<u><b>P 687</b></u>	<u><b>P 1,442</b></u>	<u><b>P 141</b></u>
<b>2018:</b>				
Foreign currency risk	P 34	P 38	P 72	P 13
Interest rate risk	<u>730</u>	<u>190</u>	<u>843</u>	<u>47</u>
Overall	<u><b>P 764</b></u>	<u><b>P 228</b></u>	<u><b>P 915</b></u>	<u><b>P 60</b></u>

	<b>Group</b>			
	<u>At December 31</u>	<u>Average</u>	<u>Maximum</u>	<u>Minimum</u>
2017:				
Foreign currency risk	P 7	P 11	P 32	P 2
Interest rate risk	<u>363</u>	<u>287</u>	<u>501</u>	<u>154</u>
Overall	<u>P 370</u>	<u>P 298</u>	<u>P 533</u>	<u>P 156</u>
	<b>Parent Company</b>			
	<u>At December 31</u>	<u>Average</u>	<u>Maximum</u>	<u>Minimum</u>
2019:				
Foreign currency risk	P 72	P 34	P 88	P 10
Interest rate risk	<u>218</u>	<u>653</u>	<u>1,354</u>	<u>131</u>
Overall	<u>P 290</u>	<u>P 687</u>	<u>P 1,442</u>	<u>P 141</u>
2018 (As restated):				
Foreign currency risk	P 34	P 38	P 71	P 13
Interest rate risk	<u>672</u>	<u>153</u>	<u>773</u>	<u>44</u>
Overall	<u>P 706</u>	<u>P 191</u>	<u>P 844</u>	<u>P 57</u>
2017 (As restated):				
Foreign currency risk	P 7	P 11	P 31	P 2
Interest rate risk	<u>147</u>	<u>125</u>	<u>277</u>	<u>40</u>
Overall	<u>P 154</u>	<u>P 136</u>	<u>P 308</u>	<u>P 42</u>

### 4.3.1 Foreign Exchange Risk

Foreign exchange risk is the risk to earnings or capital arising from changes in foreign exchange rates. The net foreign exchange exposure, or the difference between foreign currency denominated assets and foreign currency denominated liabilities, is capped by current BSP regulations. Compliance with this ceiling by the Group and the respective foreign currency positions of its subsidiaries are reported to the BSP on a daily basis as required. Beyond this constraint, the Group manages its foreign exchange exposure by limiting it within the conservative levels justifiable from a return/risk perspective. In addition, the Group regularly calculates VaR for each currency position, which is incorporated in the foregoing market risk management discussion.

The breakdown of the financial resources and financial liabilities as to foreign and Philippine peso-denominated balances, after elimination of intercompany accounts or transactions, as of December 31 follows:

	<b>Group</b>		
	<u>Foreign Currencies</u>	<u>Philippine Pesos</u>	<u>Total</u>
2019:			
<b>Resources:</b>			
Cash and other cash items	P 1,184	P 15,723	P 16,907
Due from BSP	-	87,255	87,255
Due from other banks	17,973	845	18,818
Loans arising from reverse repurchase agreements	-	5,768	5,768
Financial assets at FVTPL	1,657	3,891	5,548
Financial assets at FVOCI	42,696	11,549	54,245
Investment securities at amortized cost - net	93,922	7,004	100,926
Loans and receivables - net	92,602	356,617	449,219
Other resources	<u>69</u>	<u>829</u>	<u>898</u>
	<u>P 250,103</u>	<u>P 489,481</u>	<u>P 739,584</u>
<b>Liabilities:</b>			
Deposit liabilities	P 89,630	P 366,951	P 456,581
Bills payable	93,937	7,669	101,606
Bonds payable	66,314	30,500	96,814
Accrued interest and other expenses	1,162	4,857	6,019
Other liabilities	<u>833</u>	<u>16,518</u>	<u>17,351</u>
	<u>P 251,876</u>	<u>P 426,495</u>	<u>P 678,371</u>
2018:			
<b>Resources:</b>			
Cash and other cash items	P 1,554	P 15,838	P 17,392
Due from BSP	-	56,495	56,495
Due from other banks	19,470	872	20,342
Loans arising from reverse repurchase agreements	-	10,032	10,032
Financial assets at FVTPL	3,088	4,482	7,570
Financial assets at FVOCI	506	21,481	21,987
Investment securities at amortized cost - net	73,224	15,668	88,892
Loans and receivables - net	75,755	322,545	398,300
Other resources	<u>66</u>	<u>919</u>	<u>985</u>
	<u>P 173,663</u>	<u>P 448,332</u>	<u>P 621,995</u>
<b>Liabilities:</b>			
Deposit liabilities	P 86,766	P 336,633	P 423,399
Bills payable	38,671	17,330	56,001
Bonds payable	53,090	-	53,090
Subordinated debt	-	9,986	9,986
Accrued interest and other expenses	849	4,135	4,984
Other liabilities	<u>716</u>	<u>11,228</u>	<u>11,944</u>
	<u>P 180,092</u>	<u>P 379,312</u>	<u>P 559,404</u>



	Parent Company		
	Foreign Currencies	Philippine Pesos	Total
<b>2019:</b>			
<b>Resources:</b>			
Cash and other cash items	P 1,167	P 15,641	P 16,808
Due from BSP	-	85,453	85,453
Due from other banks	17,919	549	18,468
Loans and receivables arising from reverse repurchase agreements	-	5,629	5,629
Financial assets at FVTPL	1,581	3,219	4,800
Financial assets at FVOCI	42,072	10,353	52,425
Investment securities at amortized cost - net	93,215	7,004	100,219
Loans and receivables - net	92,596	349,497	442,093
Other resources	69	827	896
	<b>P 248,619</b>	<b>P 478,172</b>	<b>P 726,791</b>
<b>Liabilities:</b>			
Deposit liabilities	P 89,630	P 366,963	P 456,593
Bills payable	93,937	1	93,938
Bonds payable	66,314	30,500	96,814
Accrued interest and other expenses	1,162	4,596	5,758
Other liabilities	833	15,720	16,553
	<b>P 251,876</b>	<b>P 417,780</b>	<b>P 669,656</b>
<b>2018 (As restated):</b>			
<b>Resources:</b>			
Cash and other cash items	P 1,542	P 15,779	P 17,321
Due from BSP	-	55,059	55,059
Due from other banks	18,861	954	19,815
Loans and receivables arising from reverse repurchase agreements	-	10,000	10,000
Financial assets at FVTPL	3,000	3,693	6,693
Financial assets at FVOCI	500	18,315	18,815
Investment securities at amortized cost	74,744	13,897	88,641
Loans and receivables - net	75,729	316,431	392,160
Other resources	66	916	982
	<b>P 174,442</b>	<b>P 434,044</b>	<b>P 609,486</b>
<b>Liabilities:</b>			
Deposit liabilities	P 85,732	P 337,797	P 423,529
Bills payable	43,404	5,355	48,759
Bonds payable	53,090	-	53,090
Subordinated debt	-	9,986	9,986
Accrued interest and other expenses	849	3,985	4,834
Other liabilities	635	10,378	11,013
	<b>P 183,710</b>	<b>P 367,501</b>	<b>P 551,211</b>

#### 4.3.2 Interest Rate Risk in the Banking Book (IRRBB)

The interest rate risk inherent in the Group's financial statements arises from re-pricing mismatches between financial assets and financial liabilities. The IRRBB Management Framework details the Group's policy on managing its assets and liabilities to ensure that exposure to fluctuations in interest rates are kept within acceptable limits.

To aid the Group in managing IRRBB, the following measurement techniques are used. These are prepared and reported to ALCO and ROC, on a monthly basis.

Technique	Description
<b>Interest Rate Gap or Repricing Gap</b>	<b>Contractual Gap</b> Measures the sensitivity of assets, liabilities and off-balance sheet items towards changes in the market interest rates based on the repricing frequency of each item.
	<b>Behavioral Gap</b> Behavioral assumption (BeA) is applied to the contractual cash flows to reflect sensitivity to market conditions or behavioral characteristics (i.e. early redemption of deposits, prepayment of loans, etc.).
<b>Earnings Approach</b> Net Interest Income at Risk	Measures the sensitivity of earnings to market interest rates movements over a short- and medium-term horizon. Interest rate volatility is based on the maximum volatility of the 1-mo, 3-mo, 6-mo and 1-yr tenors over a 260-day look back.
Technique	Description
<b>Economic Value Approach</b> Earnings-at-Risk	Measures the sensitivity of capital to market interest rates given the resulting Net Interest Income (NII)-at-Risk and fair value through profit and loss portfolio value-at-risk (FVTPL VaR).
Capital-at-Risk	Measures the sensitivity of capital to market interest rates given the resulting EaR and fair value through other comprehensive income value-at-risk (FVOCI VaR).
Economic Value of Equity	Measures the sensitivity of economic value of all non-trading book assets, liabilities and interest rate sensitive off-balance sheet products to interest rate movements over a longer time horizon
Stress Test	Assesses the ability to withstand such changes, usually in relation to the capacity of its capital and earnings to absorb potentially significant losses. Stress testing, which includes both scenario and sensitivity analysis, is an integral part of IRR management. Scenario analysis estimates possible outcomes given an event or series of events, while sensitivity analysis estimates the impact of change in one or only a few of model's significant parameters.
	<i>Earnings approach:</i> NII-at-Risk Stress Test assumes gradual increase in Peso and USD interest rates to 400bps and 300bps, respectively. These are based on past local and global market events.
	<i>Economic Value approach:</i> The EVE Stress Test uses Basel's six interest rate scenarios to capture parallel and non-parallel gap risks. The standardized scenarios are as follows: 1) parallel shock up; 2) parallel shock down; 3) steeper shock (short rates down and long rates up); 4) flattener shock (short rates up and long rates down); 5) short rates shock up; and 6) short rates shock down.

The interest rate gap analyses of financial assets and financial liabilities as of end of the reporting period based on re-pricing maturities are shown below and in the succeeding pages. It should be noted that such interest rate gap analyses are based on the following key assumptions:

- Loans and time deposits are subject to re-pricing on their contractual maturity dates. Non-performing loans, however, are not re-priced;
- Debt securities at amortized cost are bucketed based on their re-pricing profile;
- Held-for-trading securities and derivatives are considered as non-rate sensitive; and,
- For financial assets and financial liabilities with no definite re-pricing schedule or maturity, slotting is based on the Group's empirical assumptions.

These assumptions are reviewed on a regular basis. Similarly, other assumptions and behavioral models used in the preparation of other IRRBB metrics are also being reviewed, annually, at the minimum.

	Group					
	2019					
	One to Three Months	Three Months to One Year	One to Five Years	More than Five Years	Non-rate Sensitive	Total
<b>Resources:</b>						
Cash and cash equivalents	P 96,972	P 1,380	P 2,014	P -	P 47,185	P 147,551
Investments - net	77,604	3,965	38,843	35,077	5,230	160,719
Loans and receivables - net	195,605	58,556	78,541	38,456	59,258	430,416
Other resources - net	107	127	294	187	27,678	28,393
<b>Total resources</b>	<b>P 370,288</b>	<b>P 64,028</b>	<b>P 119,692</b>	<b>P 73,720</b>	<b>P 139,351</b>	<b>P 767,079</b>
<b>Liabilities:</b>						
Deposit liabilities	148,379	12,456	20,939	3	274,804	456,581
Bills payable	75,139	-	18,917	7,549	1	101,606
Bonds payable	12,305	15,000	69,509	-	-	96,814
Other liabilities	86	27	-	-	29,115	29,228
<b>Total liabilities</b>	<b>235,909</b>	<b>27,483</b>	<b>109,365</b>	<b>7,552</b>	<b>303,920</b>	<b>684,229</b>
<b>Equity</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>82,850</b>	<b>82,850</b>
<b>Total liabilities and equity</b>	<b>235,909</b>	<b>27,483</b>	<b>109,365</b>	<b>7,552</b>	<b>386,770</b>	<b>767,079</b>
<b>On-book gap Cumulative on-book gap</b>	<b>134,379</b>	<b>36,545</b>	<b>10,327</b>	<b>66,168</b>	<b>(247,419)</b>	<b>-</b>
Contingent resources	18,088	-	-	-	-	18,088
Contingent liabilities	24,141	-	-	-	-	24,141
<b>Off-book gap Cumulative off-book gap</b>	<b>(6,053)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(6,053)</b>
<b>Periodic gap Cumulative total gap</b>	<b>128,326</b>	<b>36,545</b>	<b>10,327</b>	<b>66,168</b>	<b>(247,419)</b>	<b>(6,053)</b>
<b>Periodic gap Cumulative total gap</b>	<b>P 128,326</b>	<b>P 164,871</b>	<b>P 175,198</b>	<b>P 241,366</b>	<b>(P 6,053)</b>	<b>P -</b>

	Group					
	2018					
	One to Three Months	Three Months to One Year	One to Five Years	More than Five Years	Non-rate Sensitive	Total
<b>Resources:</b>						
Cash and cash equivalents	P 44,797	P 423	P 856	P 112	P 67,595	P 113,783
Investments - net	1,227	7,063	22,311	70,923	17,348	118,872
Loans and receivables - net	225,566	31,295	71,307	18,113	42,497	388,778
Other resources - net	208	173	400	57	22,324	23,162
<b>Total resources</b>	<b>271,798</b>	<b>38,954</b>	<b>94,874</b>	<b>89,205</b>	<b>149,764</b>	<b>644,595</b>
<b>Liabilities:</b>						
Deposit liabilities	148,687	21,665	19,122	3,576	230,349	423,399
Bills payable	39,181	3,122	10,943	2,755	-	56,001
Bonds payable	-	-	53,090	-	-	53,090
Subordinated debt	-	-	-	9,986	-	9,986
Other liabilities	1,902	152	-	-	18,895	20,949
<b>Total liabilities</b>	<b>189,770</b>	<b>24,939</b>	<b>83,155</b>	<b>16,317</b>	<b>249,244</b>	<b>563,425</b>
<b>Equity</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>81,170</b>	<b>81,170</b>
<b>Total liabilities and equity</b>	<b>189,770</b>	<b>24,939</b>	<b>83,155</b>	<b>16,317</b>	<b>330,414</b>	<b>644,595</b>
<b>On-book gap Cumulative on-book gap</b>	<b>82,752</b>	<b>14,015</b>	<b>11,719</b>	<b>72,888</b>	<b>(181,374)</b>	<b>-</b>
Contingent resources	15,844	-	-	-	-	15,844
Contingent liabilities	15,922	-	-	-	38	15,960
<b>Off-book gap Cumulative off-book gap</b>	<b>(78)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(38)</b>	<b>(116)</b>
<b>Periodic gap Cumulative total gap</b>	<b>82,674</b>	<b>14,015</b>	<b>11,719</b>	<b>72,888</b>	<b>(181,412)</b>	<b>(116)</b>
<b>Periodic gap Cumulative total gap</b>	<b>P 82,674</b>	<b>P 96,689</b>	<b>P 108,408</b>	<b>P 181,296</b>	<b>(P 116)</b>	<b>P -</b>

Parent Company						
2019						
	One to Three Months	Three Months to One Year	One to Five Years	More than Five Years	Non-rate Sensitive	Total
<b>Resources:</b>						
Cash and cash equivalents	P 96,281	P 879	P 1,689	P -	P 46,920	P 145,769
Investments - net	76,491	3,965	38,843	33,717	12,152	165,168
Loans and receivables - net	194,109	57,384	72,692	38,228	60,269	422,682
Other resources - net	51	127	294	187	23,840	24,499
<b>Total resources</b>	<b>366,932</b>	<b>62,355</b>	<b>113,518</b>	<b>72,132</b>	<b>143,181</b>	<b>758,118</b>
<b>Liabilities:</b>						
Deposit liabilities	146,240	9,532	19,449	3	281,369	456,593
Bills payable	74,530	-	18,460	946	2	93,938
Bonds payable	12,304	15,000	69,510	-	-	96,814
Other liabilities	-	-	-	-	28,011	28,011
<b>Total liabilities</b>	<b>233,074</b>	<b>24,532</b>	<b>107,419</b>	<b>949</b>	<b>309,382</b>	<b>675,356</b>
<b>Equity</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>82,762</b>	<b>82,762</b>
<b>Total liabilities and equity</b>	<b>233,074</b>	<b>24,532</b>	<b>107,419</b>	<b>949</b>	<b>392,144</b>	<b>758,118</b>
<b>On-book gap</b>	<b>133,858</b>	<b>37,823</b>	<b>6,099</b>	<b>71,183</b>	<b>(248,963)</b>	<b>-</b>
<b>Cumulative on-book gap</b>	<b>133,858</b>	<b>171,681</b>	<b>177,780</b>	<b>248,963</b>	<b>-</b>	<b>-</b>
Contingent resources	17,955	-	-	-	-	17,955
Contingent liabilities	24,019	-	-	-	-	24,019
<b>Off-book gap</b>	<b>(6,064)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(6,064)</b>
<b>Cumulative off-book gap</b>	<b>(6,064)</b>	<b>(6,064)</b>	<b>(6,064)</b>	<b>(6,064)</b>	<b>(6,064)</b>	<b>-</b>
<b>Periodic gap</b>	<b>127,794</b>	<b>37,823</b>	<b>6,099</b>	<b>71,183</b>	<b>(248,963)</b>	<b>(6,604)</b>
<b>Cumulative total gap</b>	<b>P 127,794</b>	<b>P 165,617</b>	<b>P 171,716</b>	<b>P 242,899</b>	<b>(P 6,064)</b>	<b>P -</b>

2018 (As restated)						
	One to Three Months	Three Months to One Year	One to Five Years	More than Five Years	Non-rate Sensitive	Total
<b>Resources:</b>						
Cash and cash equivalents	P 34,259	P 158	P -	P -	P 77,370	P 111,787
Investments - net	1,074	7,063	22,311	49,409	41,304	121,161
Loans and receivables - net	226,304	31,053	66,896	18,113	40,202	382,568
Other resources - net	138	160	385	31	19,977	20,691
<b>Total resources</b>	<b>261,775</b>	<b>38,434</b>	<b>89,592</b>	<b>67,553</b>	<b>178,853</b>	<b>636,207</b>
<b>Liabilities:</b>						
Deposit liabilities	147,960	21,665	19,122	3,579	231,203	423,529
Bills payable	36,531	1,631	9,141	1,456	-	48,759
Bonds payable	-	-	53,090	-	-	53,090
Subordinated debt	-	9,986	-	-	-	9,986
Other liabilities	1,634	129	-	-	18,005	19,768
<b>Total liabilities</b>	<b>186,125</b>	<b>33,411</b>	<b>81,353</b>	<b>5,035</b>	<b>249,208</b>	<b>555,132</b>
<b>Equity</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>81,075</b>	<b>81,075</b>
<b>Total liabilities and equity</b>	<b>186,125</b>	<b>33,411</b>	<b>81,353</b>	<b>5,035</b>	<b>330,283</b>	<b>636,207</b>
<b>On-book gap</b>	<b>75,650</b>	<b>5,023</b>	<b>8,239</b>	<b>62,518</b>	<b>(151,430)</b>	<b>-</b>
<b>Cumulative on-book gap</b>	<b>75,650</b>	<b>80,673</b>	<b>88,912</b>	<b>151,430</b>	<b>-</b>	<b>-</b>
Contingent resources	15,808	-	-	-	-	15,808
Contingent liabilities	15,874	-	-	-	38	15,912
<b>Off-book gap</b>	<b>(66)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(38)</b>	<b>(104)</b>
<b>Cumulative off-book gap</b>	<b>(66)</b>	<b>(66)</b>	<b>(66)</b>	<b>(66)</b>	<b>(104)</b>	<b>-</b>
<b>Periodic gap</b>	<b>75,584</b>	<b>5,023</b>	<b>8,239</b>	<b>62,518</b>	<b>(151,468)</b>	<b>(104)</b>
<b>Cumulative total gap</b>	<b>P 75,584</b>	<b>P 80,607</b>	<b>P 88,846</b>	<b>P 151,364</b>	<b>(P 104)</b>	<b>P -</b>

The table below summarizes the potential impact on the Group and the Parent Company's annual interest income of parallel rate shifts using the repricing.

	Changes in Interest Rates (in basis points)			
	- 100	- 200	+ 100	+ 200
<b>December 31, 2019</b>				
Group	(P 1,225)	(P 2,450)	P 1,225	P 2,450
Parent Company	(1,205)	(2,410)	1,205	2,410
<b>December 31, 2018</b>				
Group	(P 1,167)	(P 2,334)	P 1,167	P 2,334
Parent Company (As restated)	(1,420)	(2,841)	1,420	2,841

### 4.3.3 Equity Price Risk

The Group's exposure to price risk on equity securities held and classified in the statement of financial position as financial assets at FVTPL or financial assets at FVOCI as of December 31, 2019 and 2018 is managed through diversification of portfolio and monitoring of changes in market prices. Diversification of the portfolio is done in accordance with the limits set by the Group.

Moreover, RCBC Capital and RSI estimate the potential loss and determine the market and position risk requirement on equity securities at FVTPL in the computation of the market and position risk requirement for all equity positions.

RCBC Capital uses the delta-normal approach as its VaR model to estimate the daily potential loss that can be incurred from equity securities held for trading. VaR is a key measure in the management of market price risk. VaR is defined as a statistical estimate of the maximum possible loss on a given position during a time horizon within a given confidence interval. RCBC Capital uses a 99% confidence level and a minimum 260-day observation period in VaR calculation. In addition, RSI computes its market and position risk for all equity positions, if any, in conjunction with the Risk Based Capital Adequacy ratio required to be maintained. Market and position risk requirement is calculated using position risk factor multiplied by mark-to-market value security.

## 4.4 Credit Risk

Credit risk is the risk that the counterparty in a transaction may default, and arises from lending, trade finance, treasury, derivatives and other activities undertaken by the Group. The Group manages credit risk through a system of policies and authorities that govern the processes and practices of all credit-originating and borrowing relationship management units.

The Enterprise Risk Division of CRISMS assists senior management: (a) in establishing risk concentration limits at the portfolio level; and (b) in the continuous monitoring of the actual credit risk portfolio from the perspective of those limits and other risk management objectives. The Credit Management Group (CMG), on the other hand, is responsible for: (a) the development of credit policies relating to account management; (b) the financial evaluation and credit risk rating of borrowers; and, (c) asset quality review.

At the individual borrower level, exposure to credit risk is managed via adherence to a set of policies, the most notable features of which, in this context are: (a) credit approving authority, except as noted below, is not exercised by a single individual but rather, through a hierarchy of limits that is effectively exercised collectively; (b) business center managers have limited approval authority only for credit exposure related to deposit-taking operations in the form of bills purchase, acceptance of second endorsed checks and 1:1 loan accommodations; (c) an independent credit risk assessment by the CMG of large corporate and middle-market borrowers, summarized into a borrower risk rating, is provided as input to the credit decision-making process; and, (d) borrower credit analysis is performed at origination and at least annually thereafter or co-terminus with the renewal of the credit line. In addition, adverse economic and market conditions that may impact a certain borrower or a group of borrowers may trigger the Group to conduct a special credit review prior to expiry of credit line.

In 2018, CMG also started identifying homogenous target market and design Credit Programs that will accelerate credit processing of accounts without sacrificing underwriting quality, and, set up enhanced data framework that would deepen the Bank's ability to identify potential problem accounts earlier.

### 4.4.1 Concentrations of Credit Risk

Credit risk concentration in the context of banking generally denotes the risk arising from an uneven distribution of counterparties in credit or in any other business relationships, or from a concentration in business sectors or geographic regions which is capable of generating losses large enough to jeopardize an institution's solvency. The Group monitors concentrations of credit risk by sector.

An analysis of concentrations of credit risk of the loan portfolio at the end of the reporting period is shown in Note 11.1.

In the course of the Group's implementation of ICAAP (see Note 5.2), it adopts a quantification of credit risk concentration following frameworks prescribed by some of the more advanced European central banks as well as established concentration metrics. Using sector distribution as a tool, the Group performs a straightforward application of the Herfindahl-Hirshman Index (HHI) to determine the existence of credit risk concentration.

The Group supplements this methodology with the use of the Comprehensive Concentration Index (CCI) to monitor and analyze name concentration.

The Group, however, recognizes the inherent limitations of the use of HHI and CCI to assess credit concentration risk. To augment this measure and to appropriately manage said risk, the Group performs an in-depth analysis of its large borrowing groups. To ensure the independence of this process, the review and analysis are done during the ROC meetings.

### 4.4.2 Credit Risk Assessment

The Group's credit risk assessment is performed based on the different segments of financial asset portfolio such as (a) corporate, which generally include corporate banking group loans, commercial and small-medium size segment loans, lease contract and finance receivables, and unquoted debt securities classified as loan (UDSCL), (b) retail, which include housing, auto, credit cards, and microfinance lending; and, (c) treasury, which covers credit exposures on debt securities under the Group's HTC portfolio and financial assets at FVOCI. The Group also established credit risk assessment procedures for sales contract receivables and other risk assets including accounts receivables.

#### (a) Corporate Loans

Loans, regardless if the accounts have been fully paid, extended or renewed in subsequent period, are subjected to evaluation for possible losses. The Group's estimation of credit exposure for risk management purposes is complex and requires the use of models, as the exposure varies with changes in market conditions (or industry performance), expected cash flows, and the passage of time. The assessment of credit risk of a portfolio of assets requires further estimations as to the PDs occurring, of the associated loss ratios, and of default correlations between counterparties; accordingly, such credit risk is measured using PD, LGD, and EAD, for purposes of measuring ECL.



The Group uses its internal credit risk rating system (ICRRS) to determine any evidence of potential deterioration in the quality of an instrument that take into consideration both quantitative and qualitative criteria. The rating system classifies performing accounts from a scale of AAA indicating an extremely strong capacity of the counterparty to meet financial commitments down to ratings lower than CCC demonstrating weakness in the counterparty's economic and financial condition that could lead to payment default on financial commitments. Past due accounts, accounts identified for phase-out and those that exhibit the characteristics of classified loans shall be risk-rated following the guidelines on credit classification per BSP Manual of Regulations for Banks and under the BSP Circular No. 1011, i.e., Especially Mentioned, Substandard, Doubtful or Loss. These guidelines are used by the Group to assign the individually assessed loan or a group of loans within a particular portfolio segment to a specific stage category under the PFRS 9 loan impairment standards (i.e. Stage 1, 2, 3).

In assessing accounts subject to individual assessment, the Group has established a materiality threshold of P15 for all exposures classified under Stage 3. Such threshold shall be regularly reviewed at the end of reporting period to ensure that it appropriately captures what the Parent Company considers as material items of loan for individual assessment. The provision for ECL for individually assessed exposures shall reflect consideration of the facts and circumstances that affect the repayment of each individual loan as of evaluation date.

The ICRRS is established by the Group in congruence with and with reference to the credit risk rating methodology used by Standard & Poor's (S&P) in measuring the creditworthiness of an individual borrower, whether the related borrowing is still performing or current in status. The risk ratings determined by the Group for its portfolio of loans and receivables at a given review date is updated to consider the possible shift in the economy or business environment or circumstances affecting the industry and the entity or borrower, in particular. Accordingly, a periodic assessment of credit quality may improve the borrower's rating or it could lead to one or more rating downgrades over time; hence, could lead to the transfer of credit exposure in different stages of impairment. The credit risk ratings in ICRRS are calibrated such that the risk of default increases exponentially at each higher risk rating (e.g., a difference in the PD between a risk rating of A and A- is lower than the difference in the PD between a B and B- risk rating).

In the process of applying the Group's ICRRS in determining the credit quality of loans and receivables, the Group analyzes the credit quality of the borrowers and counterparties through a set of criteria and rating scale classified into the following:

Rating Scale	Rating Description/Criteria
AAA	Extremely strong capacity to meet financial commitments
AA*	Very strong capacity to meet financial commitments
A*	Strong capacity to meet financial commitments, but somewhat susceptible to adverse economic conditions and changes in circumstances
BBB*	Adequate capacity to meet financial commitments, but more subject to adverse economic conditions

Rating Scale	Rating Description/Criteria
BB*	Less vulnerable in the near-term but faces major ongoing uncertainties to adverse business, financial and economic conditions
B*	More vulnerable to adverse business, financial and economic conditions but currently has the capacity to meet financial commitments
CCC and below*	Not at risk of loss at the moment and the borrower has the financial capacity to meet its obligations but its exposure to adverse business, financial or economic conditions has weakened it and, unless present trends are reversed, could eventually lead to losses.
Especially Mentioned	Has potential weaknesses that deserve management's close attention and if left uncorrected, these weaknesses may affect the repayment of the loan.
Substandard	Have well-defined weakness(es), that may jeopardize repayment/liquidation in full, either in respect of the business, cash flow or financial position, which may include adverse trends or developments that affect willingness or repayment ability of the borrower.
Doubtful	Loans and credit accommodations that exhibit more severe weaknesses than those classified as "Substandard", whose characteristics on the basis of currently known facts, conditions and values make collection or liquidation highly improbable.
Loss	Loans considered absolutely uncollectible or worthless

\* Ratings from AA to CCC are modified by a plus (+) or minus (-) sign to show relative standing within the rating categories.

As part of credit risk assessment documentation and reporting, the Group includes financial instruments rated as AAA to B- under the "Pass" classification, while instruments rated CCC+ and below are grouped under the Watchlisted classification. Generally, "Pass" classification include loans and other credit accommodations that do not have a greater-than-normal credit risk and do not possess the characteristics of classified loans. These are credits that have the apparent ability and willingness to satisfy their obligations in full and therefore, no loss in ultimate collection is anticipated. On the other hand, watchlisted counterparties are characterized by the following:

- those that belong to an unfavorable industry or has company-specific risk factors which represent a concern;
- the operating performance and financial strength may be marginal and it is uncertain if borrower can attract alternative course of finance;
- borrower finds it hard to cope with any significant economic downturn and a default in such a case is more than a possibility; and,
- borrower incurs net losses and has salient financial weaknesses, reflected on their financial statements, specifically in profitability.

Split classification/rating may apply for non-performing secured loans and other credit accommodations, depending on the recoverability and liquidity of the collateral. The secured portion may be classified as “substandard” or “doubtful”, as appropriate, while the unsecured portion shall be classified “loss” if there is no other source of payment other than the collateral.

In the case of syndicated loans, the Group shall maintain credit information on the borrower, and grade and make provision for its portion of the syndicated loan in accordance with its policy. The lead financial institution or bank shall provide participating financial institutions with the credit information on the borrower upon request by the participating financial institutions and inform the latter if the loan will be classified so as to achieve uniform classification of the syndicated loan.

(b) *Retail Products*

Credit Risk Management Division (CRMD) is tasked to measure, control and manage credit risk on the consumer loans business of the Group through the performance of regular monitoring, reporting and recommendation of risk mitigation measures of the actual credit risk portfolio to the Credit Committee and Risk Committee, as well as accomplishment of the corresponding review and development of credit policies and guidelines to sustain asset quality.

For consumer loans, risk assessment is performed on an individual borrower through the use of a credit application scorecard for Housing, Auto and Personal Loans while for Corporate Salary Loans, rule-based credit criteria on company accreditation and borrower evaluation has been established. The credit application scorecard makes use of customer, loan and collateral characteristics which have been assigned weights based on their predictive power in determining the propensity of an account to default or maintain a satisfactory credit performance. Credit decisions are based on recommended score cut-offs.

Asset quality of the Group is monitored through a regular portfolio performance review including customer segmentation and loan concentration risk assessment to identify sources of risk and to determine risk mitigation on segments that drive delinquency or manifests triggers for default. Likewise, close monitoring and review of industry performance, economic changes and market conditions that may affect the consumer loans business is also taken into consideration to establish a holistic risk assessment process.

For the credit card portfolio of the Group, credit risk assessment is performed through segmentation process to diversify the portfolio risk into different homogeneous populations or segments. Over-all account distribution is analyzed for three different snapshots with respect to month-on-month days past due to see consistency in the portfolio.

For microfinance and small business loans, regardless if the accounts have been fully paid, extended or renewed in subsequent period, are subjected to evaluation for possible losses. Credit risk assessment is performed based on groups of loan portfolio segmented by product type such as (a) credit accommodations to small-medium size borrowers; and, (b) agricultural and microfinance loans.

The groupings of financial instruments into a pool of shared credit quality are subject to the regular review by the Group’s CMD in order to ensure that credit exposures within a particular group remain appropriately homogenous.

(c) *Debt Securities at Amortized Cost and at FVOCI*

For debt securities, the Group adopts similar credit risk ratings published by reputable external rating agency (such as S&P). These ratings are continuously monitored and updated. The PD associated with each rating is determined based on realized default rates over the previous 12 months, as published by the rating agency.

#### 4.4.3 Assessment of Significant Increase in Credit Risk

In assessing whether the credit risk on a financial instrument has increased significantly since initial recognition, the Group assesses the change in the risk of a default occurring over the remaining life of the financial instrument. In making this assessment, the Group assesses on a periodic basis both quantitative and qualitative information that is reasonable and supportable, including historical experience and forward-looking information as appropriate. These may include macroeconomic conditions, economic sector and geographical region relevant to the counterparty or borrower and other factors that are counterparty-specific. As the Group holds various arrays of financial instruments, the extent of assessment may depend on the materiality of the financial instrument or the complexity of the portfolio being assessed.

The Group ECL model follows a three-stage impairment approach in determining the loss allowance to be recognized in the financial statements:

- (i) Stage 1 – comprises of all credit exposures that are considered ‘performing’ and with no observed SICR since initial recognition. These include those financial instruments with low credit risk. For these financial instruments, the loss allowance is determined based on a 12-month ECL.
- (ii) Stage 2 – comprises of all financial instruments assessed to have SICR since initial recognition based on the Group’s quantitative and qualitative criteria, though not yet deemed to be credit-impaired. Using the Group’s ICRR, Stage 2 includes credit exposures that are considered ‘under-performing’ in which risk ratings were downgraded by at least three notches and/or downgraded to CCC+ to Especially Mentioned. Stage 2 financial instruments may also include those facilities where the credit risk has improved and have been reclassified from Stage 3 subject to the Group’s observation period on the creditworthiness of the counterparty. A lifetime ECL is recognized for these financial instruments.
- (iii) Stage 3 – comprises credit exposures which are assessed as ‘credit-impaired’, thus considered by the Group as ‘non-performing’, which is assessed consistently with the Group’s definition of default. Generally, this includes accounts classified as Substandard, Doubtful and Loss. The Group recognizes a lifetime ECL for all credit-impaired financial assets.

The Group considers low credit risk for listed debt security when its credit risk rating is equivalent to a globally understood definition of ‘investment grade’ (which should be from at least one major rating agency); other debt securities are considered to be low credit risk when they have a low risk of default and the issuer has a strong capacity to meet its contractual cash flow obligations in the near term.

Financial assets that are credit-impaired on initial recognition are classified as purchased or originated credit-impaired assets. ECL is only recognized or released to the extent that there is a subsequent change in the ECLs.

The criteria for determining whether credit risk has increased significantly vary by portfolio and include quantitative changes in probabilities of default and qualitative factors, including a backstop based on delinquency. The credit risk of a particular exposure is deemed to have increased significantly since initial recognition if, based on the Group's internal credit assessment, the borrower or counterparty is determined to have well-defined credit weaknesses. Under the Group's ICRRS, these are exposures rated at least Substandard. For exposures with no internal credit risk rating performed, if contractual payments are more than a specified days past due threshold, the credit risk is deemed to have increased significantly since initial recognition. Depending on the number of days past due which differ across the various retail products of the Group, a credit exposure may be transferred to Stage 2 or Stage 3. Days past due are determined by counting the number of days since the earliest elapsed due date in respect of which full payment has not been received. In subsequent reporting periods, if the credit risk of the financial instrument improves such that there is no longer a SICR since initial recognition, the Group shall revert to recognizing a 12-month ECL. As a general rule, an upgrade or transfer of credit exposure from Stage 3 to Stage 1 is allowed when there is sufficient evidence to support that full collection of principal and interest is probable, consistent with the Group's definition of curing period.

For portfolios in respect of which the Group has limited historical data, external benchmark information (e.g., Basel LGD) is used to supplement the internally available data. The portfolios for which external benchmark information represents a significant input into measurement of ECL include exposures to foreign borrowers and low default borrower segments.

#### 4.4.4 Definition of Default and Credit-impaired Assets

##### (a) Loans and Receivables

The Group defines a loan instrument as in default, which is aligned with the definition of credit-impaired, when the borrower is more than 90 days past due on its contractual payments, except for the 30 days past due threshold for retail loans of the Group and one day past due for microfinance loan portfolio of Rizal Microbank. As part of a qualitative assessment of whether a customer is in default, the Group also considers a variety of instances and factors that may indicate unlikeliness to pay which may include (a) significant financial difficulty of the issuer or borrower; (b) the restructuring of a loan by the Group, for economic or legal reasons relating to the borrower's financial difficulty, on terms that the Group would not consider otherwise; or (c) it becoming probable that the borrower will enter bankruptcy or other financial reorganization. When such events occur, the Group carefully considers whether the event should result in treating the customer as defaulted.

A loan that has been renegotiated due to a deterioration in the borrower's 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. An instrument is considered to be no longer in default or have cured when the borrower is able to repay the installments in arrears and the account no longer meets any of the default criteria for a consecutive period of 180 days, observation period, within which the borrower shall make consecutive payments.

The definitions of default and observation period have been aligned with the definition used for regulatory capital purposes. Definitions of default and cure period can be rebutted and the rebuttal will be monitored and reviewed by the CRMD on annual basis to ensure definitions remains appropriate.

These criteria are consistent with the definition of default used for internal credit risk management purposes that is aligned with the default criteria used for regulatory capital purposes. Such definition is consistently applied in determining PD, LGD, and EAD for each loan portfolio segment and throughout the ECL calculations of the Group.

##### (b) Investments in Debt Securities

Investments in debt securities is assessed as credit-impaired and impairment losses are incurred if, and only if, there is objective evidence of impairment as a result of an event that occurred after the initial recognition of the security (a "loss event") and that loss event has impact on the estimated future cash flows of the securities. Losses expected as a result of future events, shall also be considered in estimating the ECL. Objective evidence that the security is impaired includes observable data that comes to the attention of the holder of the security about the following loss events:

- significant financial difficulty of the issuer or obligor;
- breach of contract, such as a default or delinquency in interest or principal payments;
- the financial institution, for economic or legal reasons relating to the issuer's financial difficulty, granting to the issuer a concession that the financial institution would not otherwise consider;
- it becoming probable that the issuer will enter bankruptcy or other financial reorganization;
- the disappearance of an active market for that security because of financial difficulties; or,
- observable data indicating that there is a measurable decrease in the estimated future cash flows from a portfolio of securities since the initial recognition of those assets, although the decrease cannot yet be identified with the individual securities in the portfolio, including adverse change in the payment status of issuers in the portfolio; or national or local economic conditions that correlate with defaults on the securities in the portfolio.

The disappearance of an active market because a financial institution's held securities are no longer publicly traded is not evidence of impairment. A downgrade of an issuer's credit rating is not, by itself, evidence of impairment, although it may be evidence of impairment when considered with other available information. A decline in the fair value of a security below its cost or amortized cost is not necessarily evidence of impairment (for example, a decline in fair value of an investment in debt security that results from an increase in the risk-free interest rate).

In making an assessment of whether an investment in sovereign debt is credit-impaired, the Group considers the following factors:

- the market's assessment of creditworthiness as reflected in the bond yields;
- the rating agencies' assessment of creditworthiness;
- the country's ability to access the capital markets for new debt issuance;
- the probability of debt being restructured, resulting in holders suffering losses through voluntary or mandatory debt forgiveness; or,
- the internal support mechanism in place to provide the necessary support as 'lender of last resort' to that country, as well as the intention, reflected in public statements, of governments and agencies to use those mechanisms. This includes an assessment of the depth of those mechanisms and, irrespective of the political intent, whether there is the capacity to fulfill the required criteria.

#### 4.4.5 Modifications of Financial Assets

In certain cases, the Group modifies the terms of the loans provided to the borrowers due to commercial renegotiations, or for distressed loans, with a view of maximizing recovery of the contractual amount of obligation that the Group is owed to. Restructuring policies and practices are based on indicators or criteria which, in the management's judgment, indicate that payment will most likely continue. Such policies are continuously reviewed and updated as necessary. Restructuring is most commonly applied to term or corporate loans (see Note 11.2).

The risk of default of such assets after modification is assessed at the reporting date and compared with the risk under the original terms at initial recognition, when the modification is not substantial and so does not result in derecognition of the original asset. The Group monitors the performance of the financial asset subsequent to its modification.

The Group may determine that the credit risk has significantly improved after restructuring (in accordance with the new terms for six consecutive months or more), so that the assets are moved from Stage 3 or Stage 2.

The Group continues to monitor if there is a subsequent SICR in relation to such modified assets through the use of specific models for modified assets.

#### 4.4.6 Expected Credit Loss Measurement Inputs

Integral in the Group's established policies in measuring and calculating ECL on financial instrument is the use of appropriate model for each segment of financial asset that applies relevant inputs and assumptions, including forward-looking information as appropriate.

##### (a) Key Inputs and Assumptions in the Expected Credit Loss Model

The ECL is determined by projecting the PD, LGD and EAD for each future month and for each individual exposure or collective segment.

- (i) Probability of default (PD) represents an estimate of likelihood of a borrower defaulting on its financial obligation over a given time horizon, either over the next 12 months (12-month PD) or over the remaining lifetime (lifetime PD) of the obligation. PD is calculated based on statistical rating models, and assessed using rating tools tailored to the various categories of counterparties and exposures which considers both quantitative and qualitative factors. In determining PD, the Group performed segmentation of its credit exposures based on homogenous characteristics [including corporate loan and retail loan (including credit-card and microfinance)] and developed a systematic PD methodology for each portfolio. Generally, if a counterparty or exposure migrates between rating classes, this will lead to a change in the estimate of the associated PD.
- (ii) Loss given default (LGD) pertains to estimate of loss related to the amount that may not be recovered after the borrower defaults. The Group estimates LGD parameters based on historical recovery rates of claims against defaulted counterparties, which takes into consideration the realization of any collateral that is integral to the financial asset. For secured credit exposure, the determination of LGD is dependent on the Group's collateral data which are available at the origination of the instrument which takes into account the amount and timing of the cash inflows (actual recovery) and outflows (actual expenses) and on the time value of money. Recoveries are calculated on a discounted cash flows basis using the effective interest rate as the discounting factor.

- (iii) Exposure at default (EAD) represents the gross carrying amount of the exposure in the event of default which include the amortized cost amount of an instrument and any accrued interest receivable. For lending commitments, the EAD includes the amount of drawn and undrawn irrevocable loan commitments under the contract, which are estimated based on historical observations and forward-looking forecast. For some financial assets (e.g., credit card lending), EAD is determined by modelling the range of possible exposure outcomes at various points in time using scenario and statistical technique which considers the ability of borrowers to increase its exposure from the time of ECL calculation to the time of default (i.e., credit conversion factor).

These three components are multiplied together and adjusted for the likelihood of survival (i.e., the exposure has not been prepaid or defaulted in an earlier month). This effectively calculates an ECL for each future month, which is then discounted back to and summed at the end of the reporting period. The discount rate used in the ECL calculation is the original effective interest rate or an approximation thereof.

The lifetime PD is developed by applying a maturity profile to the current 12-month PD. The maturity profile looks at how defaults develop on a portfolio from the point of initial recognition throughout the life of the instrument. The maturity profile is based on historical observed data and is assumed to be the same across all assets within a portfolio and credit grade band. Such profile is supported by a historical analysis (i.e., an observation period of five years) which uses, among others the number of rated accounts and ratings of bad accounts at the time of default. Bad accounts are defaulted accounts classified into three classes such as the non-performing loans, accounts classified as Substandard, Doubtful or Loss, and real past due accounts. In a risk rating model applied by the Group, a better rating or score denotes less probability of default than those of a worse rating. Identifying the counterparty default is done through a computation of the portfolio's observed default frequency (ODF). In cases when ODF method and the data to be used is limited, the Group may also employ the implied probability of default frequency (IPD) and the application of overlay factors in the PD. Using the historical defaults under the Group's ICRRS based on S&P scale, ODF is calculated per rating class using the cumulative five-year data as the basis for grouping. This represents the actual numbers of bad borrower cases that have occurred during the five-year timeframe. On the other hand, unrated account are distributed to existing S&P rating classes using normal distribution assumption. In cases when there is zero-percent ODF in any of the rating class, these are grouped together with the next rating class with at least one bad borrower using cumulative five-year data. If there is no rating class after certain rating, grouping shall be decided by management.

The 12-month and lifetime EADs are determined based on the expected payment profile, which varies by product type.

For loans with periodic amortization and one-time full payment at end of the term, EAD is based on the contractual repayments owed by the borrower over a 12-month or lifetime basis. This will also be adjusted for any expected overpayments made by a borrower. Early repayment or refinancing assumptions are also incorporated into the calculation.

For revolving products (such as credit cards and credit line facilities), EAD is determined by taking current drawn balance and adding a "credit conversion factor" which allows for the expected drawdown of the remaining limit by the time of default. These assumptions vary by product type and current limit utilization band, based on analysis of the Group's recent default data.



The 12-month and lifetime LGDs are determined based on the factors which impact the recoveries made post default, and may vary by product type. For secured products, this is primarily based on collateral type and projected collateral values, historical discounts to market or book values due to forced sales, time to repossession and recovery costs observed. For unsecured products, LGD is typically set at product level due to the limited differentiation in recoveries achieved across different borrowers. The LGD is influenced by collection strategies.

For cash and cash equivalents and debt securities, the Group applies the low credit risk simplification. The probability of default and loss given defaults are publicly available and are considered to be low credit risk investments. It is the Group's policy to measure ECL on such instruments on a 12-month basis. However, when there has been a significant increase in credit risk since origination, the allowance will be based on the lifetime ECL. The Group uses the ratings from S&P to determine whether the debt instrument has significantly increased in credit risk and to estimate ECL.

The assumptions underlying the ECL calculation are monitored and reviewed on an annual basis. There have been no significant changes in estimation techniques or significant assumptions made during the reporting period.

The determination of the 12-month and lifetime PD, LGD, and EAD includes the overlay of forward-looking economic information discussed below.

*(b) Overlay of Forward-looking Information*

The Group incorporates forward-looking information (FLI) in its calculation of ECL. The Group has performed historical analysis and has identified the key macroeconomic variables (MEVs) impacting credit risk associated with its borrowers and/or counterparties and the ECL for relevant portfolio of debt instruments.

The MEVs and their associated impact on the PD, LGD and EAD vary by financial instrument. To project the MEVs for the full remaining life of each financial instrument, a mean reversion approach has been used, which means that MEVs tend to either a long run average rate (e.g., for unemployment) or a long run average growth rate (e.g., GDP) over a period of two to five years. The impact of these economic variables on the PD, LGD and EAD has been determined by performing statistical regression analysis to understand the impact changes in these variables have had historically on default rates and on the components of LGD and EAD.

The MEVs considered by the Group includes economic data and forecasts published by government bodies (e.g., BSP and Philippine Statistics Authority), international organizations (e.g., International Monetary Fund), and certain reputable private and academic organizations involved in forecasting. Accordingly, the Group has identified key drivers for credit risk for its corporate loans portfolio, which include among others, Gross Domestic Product (GDP) growth rate, inflation rate unemployment rate, interest rate (i.e., based on 91-day T-bill Yield), and foreign currency exchange rates. On the other hand, the key drivers for the Group's retail and consumer loans portfolio include unemployment rate, GDP growth rate, consumer spending growth rate, and inflation rate. Using an analysis of historical data, the Group has estimated relationships between MEVs and credit risk and credit losses.

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 projections. The Group considers these forecasts to represent its best estimate of the possible outcomes.

Management has also considered other FLI not incorporated within the above economic scenarios, such as any regulatory, legislative, or political changes, but are not deemed to have a significant impact on the calculation of ECL. Management reviews and monitors the appropriateness of FLIs on a regular basis and additional factors may be incorporated from time to time as deemed appropriate.

#### 4.4.7 Credit Risk Exposures

An analysis of the maximum credit risk exposure relating to loans and receivables is shown below:

		2019			
		Gross Maximum Exposure	Fair Value of Collaterals	Net Exposure	Financial Effect of Collaterals
<b>Group</b>					
Loans and discounts	P	377,947	P 604,210	P -	P 377,947
Credit card receivables		<u>31,043</u>	<u>-</u>	<u>31,043</u>	<u>-</u>
	<b>P</b>	<b><u>408,990</u></b>	<b><u>P 604,210</u></b>	<b><u>P 31,043</u></b>	<b><u>P 377,947</u></b>
		2019			
		Gross Maximum Exposure	Fair Value of Collaterals	Net Exposure	Financial Effect of Collaterals
<b>Parent Company</b>					
Loans and discounts	P	373,480	P 596,863	P -	P 373,480
Credit card receivables		<u>31,043</u>	<u>-</u>	<u>31,043</u>	<u>-</u>
	<b>P</b>	<b><u>404,523</u></b>	<b><u>P 596,863</u></b>	<b><u>P 31,043</u></b>	<b><u>P 373,480</u></b>
		2018			
		Gross Maximum Exposure	Fair Value of Collaterals	Net Exposure	Financial Effect of Collaterals
<b>Group</b>					
Loans and discounts	P	340,011	P 506,783	P -	P 340,011
Credit card receivables		<u>21,550</u>	<u>-</u>	<u>21,550</u>	<u>-</u>
	<b>P</b>	<b><u>361,561</u></b>	<b><u>P 506,783</u></b>	<b><u>P 21,550</u></b>	<b><u>P 340,011</u></b>
<b>Parent Company (As restated)</b>					
Loans and discounts	P	337,065	P 501,526	P -	P 337,065
Credit card receivables		<u>21,550</u>	<u>-</u>	<u>21,550</u>	<u>-</u>
	<b>P</b>	<b><u>358,615</u></b>	<b><u>P 501,526</u></b>	<b><u>P 21,550</u></b>	<b><u>P 337,065</u></b>

The table below sets out the gross carrying amounts of the exposures to credit risk on financial assets with low credit risk measured at amortized cost and debt securities at FVOCI as of December 31.

	Group		Parent Company	
	2019	2018	2019	2018 (As restated)
Cash equivalents	P 130,644	P 96,391	P 128,961	P 94,466
Debt securities				
At amortized cost	101,065	89,027	100,268	88,686
At FVOCI	50,612	15,526	49,584	15,138
	<b>P 282,321</b>	<b>P 200,944</b>	<b>P 278,813</b>	<b>P 198,290</b>

Cash equivalents includes loans and advances to banks [i.e., Due from BSP, Due from Other Banks, Loans Arising from Repurchase Agreements, and Interbank Loans Receivables (see Note 9)]. Debt securities includes government and corporate bonds and bills. These are held with central bank, financial institutions and other counterparties that are reputable and with low credit risk; hence, ECL is negligible.

The information about the credit exposures on the above financial assets as well as on loan commitments by stages of impairment as of December 31, 2019 and 2018, shown at their gross carrying amounts with the corresponding allowance for ECL are shown in the succeeding pages. All instruments, which were not assessed by the Group for ECL based on individual credit risk rating were evaluated on a collective basis, applying applicable PD and LGD based on the segment of instrument.

The maximum exposure to credit risks for other financial assets is limited to their carrying values as of December 31, 2019 and 2018.

a) Loans and receivables – Group and Parent Company

	Corporate Loans				
	Stage 1	Stage 2	Stage 3	Purchased credit-impaired*	Total
<b>2019</b>					
Pass					
AAA to BBB	P 13,625	P 28	P 17	P -	P 13,670
BBB- to B-	261,751	21	266	-	262,038
Watchlisted	29	5,811	46	-	5,886
Especially mentioned	-	1,053	268	-	1,321
Defaulted	-	-	8,416	52	8,468
Unrated	2,361	83	106	-	2,550
	277,766	6,996	9,119	52	293,933
Allowance for ECL	(706)	(529)	(4,659)	(36)	(5,930)
Carrying amount	<b>P 277,060</b>	<b>P 6,467</b>	<b>P 4,460</b>	<b>P 16</b>	<b>P 288,003</b>

	Corporate Loans				
	Stage 1	Stage 2	Stage 3	Purchased credit-impaired*	Total
<b>2018</b>					
Pass					
AAA to BBB	P 8,085	P 4	P 1	P -	P 8,090
BBB- to B-	244,778	3	182	-	244,963
Watchlisted	60	2,596	7,610	-	10,266
Especially mentioned	-	247	90	-	337
Defaulted	-	-	2,553	52	2,605
Unrated	1,879	6	26	-	1,911
	254,802	2,856	10,462	52	268,172
Allowance for ECL	(483)	(294)	(3,145)	(36)	(3,958)
Carrying amount	<b>P 254,319</b>	<b>P 2,562</b>	<b>P 7,317</b>	<b>P 16</b>	<b>P 264,214</b>

\*Purchased credit-impaired financial assets pertain to the non-performing loans of RCBC – JPL which were acquired as credit-impaired prior to 2018.

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<b>2019</b>				
<b>Housing loans</b>				
Standard monitoring	P 44,966	P 5,845	P -	P 50,811
Default	-	-	2,603	2,603
	44,966	5,845	2,603	53,414
Allowance for ECL	(450)	(258)	(226)	(934)
Carrying amount	<b>44,516</b>	<b>5,587</b>	<b>2,377</b>	<b>52,480</b>
<b>Credit cards</b>				
Current	28,331	-	-	28,331
1-29 dpd	779	-	-	779
30-59 dpd	-	356	-	356
60-89 dpd	-	310	-	310
Defaulted	-	-	1,267	1,267
	29,110	666	1,267	31,043
Allowance for ECL	(510)	(278)	(1,051)	(1,839)
Carrying amount	<b>28,600</b>	<b>388</b>	<b>216</b>	<b>29,204</b>

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<b>2019</b>				
<b>Auto loans</b>				
Standard monitoring	P 34,092	P 5,176	P -	P 39,268
Default	-	-	2,147	2,147
	34,092	5,176	2,147	41,415
Allowance for ECL	( 341)	( 202)	( 755)	( 1,298)
<b>Carrying amount</b>	<b>33,751</b>	<b>4,974</b>	<b>1,392</b>	<b>40,117</b>
<b>Personal and salary loans</b>				
Standard monitoring	P 998	P 108	P -	P 1,106
Default	-	-	42	42
	998	108	42	1,148
Allowance for ECL	( 54)	( 47)	( 37)	( 138)
<b>Carrying amount</b>	<b>944</b>	<b>61</b>	<b>5</b>	<b>1,010</b>
<b>Leasing and finance receivables*</b>				
AAA+ – B+	P 1,891	P -	P -	P 1,891
B – B-	-	1,985	-	1,985
CCC and below	-	-	569	569
	1,891	1,985	569	4,445
Allowance for ECL	( 62)	( 275)	( 246)	( 583)
<b>Carrying amount</b>	<b>1,829</b>	<b>1,710</b>	<b>323</b>	<b>3,862</b>
<b>Micro and small business loans**</b>				
Unclassified	P 1,142	P -	P -	P 1,142
Especially mentioned	-	29	-	29
Defaulted	-	-	143	143
	1,142	29	143	1,314
Allowance for ECL	( 15)	( 11)	( 55)	( 81)
<b>Carrying amount</b>	<b>1,127</b>	<b>18</b>	<b>88</b>	<b>1,233</b>
Total gross amount	P 112,199	P 13,809	P 6,771	P 132,779
Total allowance for ECL	( 1,432)	( 1,071)	( 2,370)	( 4,873)
<b>Total carrying amount</b>	<b>P 110,767</b>	<b>P 12,738</b>	<b>P 4,401</b>	<b>P 127,906</b>

\*Leasing and finance receivables are from RLFC

\*\*Micro and small business loans are from RMB

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<b>2018</b>				
<b>Housing loans</b>				
Standard monitoring	P 41,561	P 4,998	P -	P 46,560
Default	-	-	797	797
	41,561	4,998	797	47,356
Allowance for ECL	( 416)	( 337)	( 138)	( 891)
<b>Carrying amount</b>	<b>41,145</b>	<b>4,661</b>	<b>659</b>	<b>46,465</b>
<b>Credit cards</b>				
Current	19,815	20	-	19,835
1-29 dpd	430	5	-	435
30-59 dpd	-	220	-	220
60-89 dpd	-	168	-	168
Defaulted	-	-	892	892
	20,245	413	892	21,550
Allowance for ECL	( 380)	( 163)	( 757)	( 1,300)
<b>Carrying amount</b>	<b>19,865</b>	<b>250</b>	<b>135</b>	<b>20,250</b>
<b>Auto loans</b>				
Standard monitoring	P 31,823	P 4,162	P -	P 35,985
Default	-	-	707	707
	31,823	4,162	707	36,692
Allowance for ECL	( 340)	( 352)	( 166)	( 858)
<b>Carrying amount</b>	<b>31,483</b>	<b>3,810</b>	<b>541</b>	<b>35,834</b>
<b>Personal and salary loans</b>				
Standard monitoring	P 645	P 32	P -	P 647
Default	-	-	19	19
	645	32	19	696
Allowance for ECL	( 84)	( 20)	( 17)	( 121)
<b>Carrying amount</b>	<b>561</b>	<b>13</b>	<b>2</b>	<b>575</b>
<b>Leasing and finance receivables*</b>				
AAA+ – B+	P 1,795	P -	P -	P 1,795
B – B-	-	1,543	-	1,543
CCC and below	-	-	652	652
	1,795	1,543	652	3,990
Allowance for ECL	( 33)	( 254)	( 183)	( 470)
<b>Carrying amount</b>	<b>1,762</b>	<b>1,289</b>	<b>469</b>	<b>3,520</b>
<b>Micro and small business loans**</b>				
Unclassified	P 1,098	P -	P -	P 1,098
Especially mentioned	-	41	-	41
Defaulted	-	-	82	82
	1,098	41	82	1,221
Allowance for ECL	( 9)	( 7)	( 64)	( 80)
<b>Carrying amount</b>	<b>1,089</b>	<b>34</b>	<b>18</b>	<b>1,141</b>

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
Total gross amount	P 97,167	P 11,189	P 3,149	P 111,505
Total allowance for ECL	( 1,262)	( 1,133)	( 1,325)	( 3,720)
Total carrying amount	<b>P 95,905</b>	<b>P 10,056</b>	<b>P 1,824</b>	<b>P 107,785</b>

\*Leasing and finance receivables are from RLFC

\*\* Micro and small business loans are from RMB

b) Investments in debt securities at amortized cost and at FVOCI

	Group		Parent Company	
	HTC	FVOCI	HTC	FVOCI
<b>2019</b>				
Government securities				
AAA to A+	P 68,342	P 24,226	P 68,342	P 24,226
BBB+ to BBB-	23,869	19,055	23,869	19,055
	<u>92,211</u>	<u>43,281</u>	<u>92,211</u>	<u>43,281</u>
Corporate debt securities				
AAA	267	2,396	267	2,396
AA+ to A+	5,527	1,824	5,527	1,824
A to A-	1,002	999	1,002	999
BBB+ to BBB-	897	1,702	862	1,085
BB+ to BB-	636	412	399	-
B+ and below	525	-	-	-
	<u>8,854</u>	<u>7,333</u>	<u>8,057</u>	<u>6,304</u>
Allowance for ECL	( 139)	( 2)	( 49)	( 1)
	<u>8,715</u>	<u>7,331</u>	<u>8,008</u>	<u>6,303</u>
	<b>P 100,926</b>	<b>P 50,612</b>	<b>P 100,219</b>	<b>P 49,584</b>
<b>2018 (As restated)</b>				
Government securities				
AA+ to A+	P 2,058	P -	P 2,058	P -
BBB+ to BBB-	64,026	15,138	64,026	15,138
	<u>66,084</u>	<u>15,138</u>	<u>66,084</u>	<u>15,138</u>
Corporate debt securities				
AAA	1,352	-	1,352	-
AA+ to A+	2,255	-	2,255	-
A to A-	1,283	-	1,283	-
BBB+ to BBB-	12,135	5	13,125	-
BB+ to BB-	5,828	383	5,478	-
B+ and below	90	-	109	-
	<u>22,943</u>	<u>388</u>	<u>23,602</u>	<u>-</u>
Allowance for ECL	( 135)	-	( 45)	-
	<u>22,808</u>	<u>388</u>	<u>23,557</u>	<u>-</u>
	<b>P 88,892</b>	<b>P 15,526</b>	<b>P 89,641</b>	<b>P 15,138</b>

Credit exposures for debt securities not held for trading are all classified as Stage 1.

c) Loan Commitments

The credit quality of the Group and Parent Company's irrevocable loan commitments with amounts determined after considering credit conversion factor, as of December 31 follows:

	Group and Parent Company			
	Stage 1	Stage 2	Stage 3	Total
<b>2019</b>				
Corporate loans				
Pass				
AAA to BBB	P 2,180	P -	P -	P 2,180
BBB- to B-	3,307	-	-	3,307
Watchlisted	-	226	-	226
Unrated	101	-	13	114
	<u>5,588</u>	<u>226</u>	<u>13</u>	<u>5,827</u>
ECL provisions	( 10)	( 9)	( 5)	( 24)
	<u>5,578</u>	<u>217</u>	<u>8</u>	<u>5,803</u>
Credit cards				
Current	7,599	-	-	7,599
1-29 dpd	-	-	-	-
30-59 dpd	-	-	-	-
60-89 dpd	-	-	-	-
Defaulted	-	-	-	-
	<u>7,599</u>	<u>-</u>	<u>-</u>	<u>7,599</u>
ECL provisions	( 101)	-	-	( 101)
	<u>7,498</u>	<u>-</u>	<u>-</u>	<u>7,498</u>
	<b>P 13,076</b>	<b>P 217</b>	<b>P 8</b>	<b>P 13,301</b>
<b>2018</b>				
Corporate loans				
Pass				
AAA to BBB	P 1,479	P -	P -	P 1,479
BBB- to B-	24,967	-	-	24,967
Watchlisted	-	16	-	16
Unrated	657	-	-	657
	<u>27,103</u>	<u>16</u>	<u>-</u>	<u>27,119</u>
ECL provisions	( 10)	-	-	( 10)
	<u>27,093</u>	<u>16</u>	<u>-</u>	<u>27,109</u>
Credit cards				
Current	54,153	37	-	54,190
1-29 dpd	341	7	-	348
30-59 dpd	-	71	-	71
60-89 dpd	-	45	-	45
Defaulted	-	-	241	241
	<u>54,494</u>	<u>160</u>	<u>241</u>	<u>54,895</u>
ECL provisions	( 84)	-	-	( 84)
	<u>54,410</u>	<u>160</u>	<u>241</u>	<u>54,811</u>
	<b>P 81,503</b>	<b>P 176</b>	<b>P 241</b>	<b>P 81,920</b>



#### 4.4.8 Allowance for Expected Credit Loss

The following tables show the reconciliation of the loss allowance for ECL by class of significant financial instruments.

##### a) Loans and receivables – Group and Parent Company

	Corporate Loans				
	Stage 1	Stage 2	Stage 3	Purchased credit-impaired	Total
<b>2019</b>					
Balance at beginning of year	P 483	P 294	P 3,145	P 36	P 3,958
Transfers:					
Stage 1 to Stage 2	( 14)	14	-	-	-
Stage 1 to Stage 3	( 9)	-	9	-	-
Assets derecognized or repaid	( 1,347)	( 20)	519	-	( 848)
New assets originated:					
Remained in Stage 1	1,598	-	-	-	1,598
Moved to Stages 2 and 3	-	241	986	-	1,227
	228	235	1,514	-	1,972
Balance at end of year	<b>P 706</b>	<b>P 529</b>	<b>P 4,659</b>	<b>P 36</b>	<b>P 5,930</b>
<b>2018</b>					
Balance at beginning of year	P 471	P 1,193	P 1,700	P 46	P 3,410
Transfers:					
Stage 1 to Stage 2	( 1)	1	-	-	-
Stage 1 to Stage 3	( 1)	-	1	-	-
Stage 2 to Stage 1	13	( 13)	-	-	-
Stage 3 to Stage 1	1	-	( 1)	-	-
Assets derecognized or repaid	( 390)	( 963)	( 293)	-	( 1,646)
New assets originated:					
Remained in Stage 1	388	-	-	-	388
Moved to Stage 2 and 3	-	77	1,738	( 10)	1,805
	12	( 899)	1,445	( 10)	548
Balance at end of year	<b>P 483</b>	<b>P 294</b>	<b>P 3,145</b>	<b>P 36</b>	<b>P 3,958</b>

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<b>2019</b>				
<b>Housing loans</b>				
Balance at beginning of year	P 416	P 337	P 138	P 891
Transfers:				
Stage 1 to Stage 2	( 36)	36	-	-
Stage 1 to Stage 3	( 6)	-	6	-
Stage 2 to Stage 1	69	( 69)	-	-
Stage 2 to Stage 3	-	( 99)	99	-
Assets derecognized or repaid	( 17)	( 53)	( 54)	( 124)
New assets originated:				
Remained in Stage 1	24	-	-	24
Moved to Stage 2 and 3	-	106	37	143
	34	( 79)	88	43
Balance at end of year	<b>450</b>	<b>258</b>	<b>226</b>	<b>934</b>
<b>Credit cards</b>				
Balance at beginning of year	380	163	757	1,300
Transfers:				
Stage 1 to Stage 2	( 15)	15	-	-
Stage 1 to Stage 3	( 28)	-	28	-
Stage 2 to Stage 3	-	( 28)	28	-
Stage 3 to Stage 2	-	17	( 17)	-
Stage 2 to Stage 1	23	( 23)	-	-
Stage 3 to Stage 1	26	-	( 26)	-
New assets originated:				
Assets derecognized	( 946)	( 291)	( 663)	( 1,900)
Assets originated	1,156	395	867	2,418
Write offs	-	-	( 1,559)	( 1,559)
Others	( 86)	( 30)	1,636	1,580
	130	115	294	539
Balance at end of year	<b>510</b>	<b>278</b>	<b>1,051</b>	<b>1,839</b>
<b>Auto loans</b>				
Balance at beginning of year	340	352	166	858
Transfers:				
Stage 1 to Stage 2	( 40)	40	-	-
Stage 1 to Stage 3	( 9)	-	9	-
Stage 2 to Stage 1	68	( 68)	-	-
Stage 2 to Stage 3	-	( 95)	95	-
New assets originated:				
Remained in Stage 1	7	-	-	7
Moved to Stages 2 and 3	-	79	881	960
Financial assets derecognized or repaid	( 25)	( 93)	( 26)	( 144)
Write-offs	-	( 13)	( 370)	( 383)
	1	( 150)	589	440
Balance at end of year	<b>P 341</b>	<b>P 202</b>	<b>P 755</b>	<b>P 1,298</b>

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<b>Personal and salary loans</b>				
Balance at beginning of year	P 84	P 20	P 17	P 121
Transfers:				
Stage 1 to Stage 2	( 8)	8	-	-
Stage 1 to Stage 3	( 5)	-	5	-
Stage 2 to Stage 1	1	( 1)	-	-
Stage 2 to Stage 3	( 11)		11	-
New assets originated:				
Remained in Stage 1	22	-	-	22
Moved to Stages 2 and 3	-	7	7	14
Financial assets derecognized or repaid	( 15)	( 2)	-	( 17)
Write-offs	-	-	( 16)	( 16)
Others	( 25)	26	13	14
	( 30)	27	20	18
<b>Balance at end of year</b>	<b>54</b>	<b>47</b>	<b>37</b>	<b>138</b>
<b>Leasing and finance receivables*</b>				
Balance at beginning of year	P 33	P 254	P 183	P 470
Transfers:				
Stage 1 to Stage 2	( 142)	142	-	-
Stage 2 to Stage 3	-	( 234)	234	-
Stage 3 to Stage 2	-	3	( 3)	-
New assets originated:				
Remained in Stage 1	36	-	-	36
Moved to Stages 2 and 3	-	34	-	34
Others	135	76	( 168)	( 43)
	29	21	63	113
<b>Balance at end of year</b>	<b>62</b>	<b>275</b>	<b>246</b>	<b>583</b>
<b>Micro and small business loans**</b>				
Balance at beginning of year	P 9	P 7	P 64	P 80
Transfers:				
Stage 1 to Stage 2	( 4)	4	-	-
Stage 2 to Stage 3	-	( 3)	3	-
Financial assets derecognized or repaid	( 2)	( 3)	-	( 5)
New assets originated:				
Remained in Stage 1	12	-	-	12
Moved to Stages 2 and 3	-	6	-	6
Write-offs	-	-	( 12)	( 12)
	6	4	( 9)	1
<b>Balance at end of year</b>	<b>15</b>	<b>11</b>	<b>55</b>	<b>81</b>
	<b>P 1,479</b>	<b>P 939</b>	<b>P 1,800</b>	<b>P 4,218</b>

\*Leasing and finance receivables are from RLFC

\*\*Micro and small business loans are from RMB

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<b>2018</b>				
<b>Housing loans</b>				
Balance at beginning of year	P 147	P 180	P 767	P 1,094
Transfers:				
Stage 1 to Stage 2	( 33)	33	-	-
Stage 2 to Stage 1	327	( 327)	-	-
Stage 2 to Stage 3	-	( 165)	165	-
Stage 3 to Stage 2	-	423	( 423)	-
New assets originated:				
Remained in Stage 1	63	-	-	63
Moved to Stage 2 and 3	-	366	2	368
Financial assets derecognized or repaid	( 88)	( 173)	( 373)	( 634)
	269	157	( 629)	( 204)
<b>Balance at end of year</b>	<b>416</b>	<b>337</b>	<b>138</b>	<b>891</b>
<b>Credit cards</b>				
Balance at beginning of year	P 260	P 355	P 439	P 1,054
Transfers:				
Stage 1 to Stage 2	( 9)	9	-	-
Stage 1 to Stage 3	( 25)	-	25	-
Stage 2 to Stage 1	28	( 28)	-	-
Stage 2 to Stage 3	-	( 61)	61	-
Stage 3 to Stage 1	14	-	( 14)	-
Stage 3 to Stage 2	-	42	( 42)	-
New assets originated:				
Remained in Stage 1	76	-	-	76
Moved to Stage 2 and 3	-	23	33	56
Write-offs	-	-	( 1,129)	( 1,129)
Others	36	( 177)	1,384	1,243
	120	( 192)	318	246
<b>Balance at end of year</b>	<b>380</b>	<b>163</b>	<b>757</b>	<b>1,300</b>
<b>Auto Loans</b>				
Balance at beginning of year	P 82	P 268	P 329	P 679
Transfers:				
Stage 1 to Stage 2	( 40)	40	-	-
Stage 1 to Stage 3	( 1)	-	1	-
Stage 2 to Stage 1	-	( 14)	-	-
Stage 2 to Stage 3	-	( 32)	32	-
New assets originated:				
Remained in Stage 1	296	-	-	296
Moved to Stage 2	-	324	24	348
Financial assets derecognized or repaid	( 11)	( 234)	( 210)	( 455)
Write-offs	-	-	( 10)	( 10)
	258	84	( 163)	179
<b>Balance at end of year</b>	<b>340</b>	<b>352</b>	<b>166</b>	<b>858</b>

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<i>Personal and salary loans</i>				
Balance at beginning of year	P 25	P 4	P 24	P 53
Transfers:				
Stage 1 to Stage 2	( 1)	1	-	-
Stage 1 to Stage 3	( 24)	-	24	-
Stage 2 to Stage 3	-	( 13)	13	-
Stage 3 to Stage 2	-	41	( 41)	-
New assets originated:				
Remained in Stage 1	118	-	-	118
Moved to Stages 2 and 3	-	40	-	40
Financial assets derecognized or repaid	( 34)	( 53)	-	( 87)
Write-offs	-	-	( 3)	( 3)
	<u>59</u>	<u>16</u>	<u>( 7)</u>	<u>67</u>
Balance at end of year	<u>84</u>	<u>20</u>	<u>17</u>	<u>121</u>
<i>Leasing and finance receivables*</i>				
Balance at beginning of year	39	186	145	370
Transfers:				
Stage 1 to Stage 2	( 16)	16	-	-
Stage 2 to Stage 3	-	( 4)	4	-
New assets originated:				
Remained in Stage 1	10	-	-	10
Moved to Stages 2 and 3	-	56	134	190
Write off	-	-	( 100)	( 100)
	<u>( 6)</u>	<u>68</u>	<u>38</u>	<u>100</u>
Balance at end of year	<u>33</u>	<u>254</u>	<u>183</u>	<u>470</u>
<i>Micro and small business loans**</i>				
Balance at beginning of year	8	2	66	76
Transfers:				
Stage 1 to Stage 2	( 6)	6	-	-
Stage 2 to Stage 3	-	( 3)	3	-
Financial assets derecognized or repaid	( 22)	( 6)	( 19)	( 47)
New assets originated:				
Remained in Stage 1	29	-	-	29
Moved to Stages 2 and 3	-	8	14	22
	<u>1</u>	<u>5</u>	<u>( 2)</u>	<u>4</u>
Balance at end of year	<u>9</u>	<u>7</u>	<u>64</u>	<u>80</u>
	<u>P 1,262</u>	<u>P 1,133</u>	<u>P 1,373</u>	<u>P 3,768</u>

\*Leasing and finance receivables are from RLFC

\*\*Micro and small business loans are from RMB

Presented below are the composition of allowance for ECL as by loan portfolio (see Note 11):

	Group		Parent Company	
	2019	2018	2019	2018
				(As restated – see Note 34)
Corporate	P 5,930	P 3,958	P 5,894	P 3,922
Credit card	1,839	1,300	1,839	1,300
Auto	1,298	858	1,298	858
Personal and salary	138	121	138	121
Leasing and finance	583	470	-	-
Microfinance and small business	81	80	-	-
Other receivables	3,561	3,504	3,557	3,488
	<u>P 13,430</u>	<u>P 10,291</u>	<u>P 12,726</u>	<u>P 9,689</u>

b) *Investments in debt securities at amortized cost and at FVOCI*

ECL for investments in debt securities at amortized cost amounted to P4 and P45 in 2019 and 2018, respectively, for the Group and P4 and P26, respectively, for the Parent Company. The allowance for ECL for investments in debt securities at amortized cost amounted to P139 and P135 for the Group and P49 and P45 for the Parent Company in December 31, 2019 and 2018, respectively. No ECL was recognized for debt securities at FVOCI acquired in 2019 and 2018.

c) *Loan commitments*

Allowance for ECL recognized both by the Group and Parent Company related to undrawn loan commitments as of December 31, 2019 and 2018 amounted to P125 and P94, respectively, presented as ECL provisions on loan commitments under Other Liabilities account (see Note 22). ECL (recovery) recognized in profit or loss in 2019 and 2018 amounted to P23 and (P13), respectively.

The information on how the significant changes in the gross carrying amount of the financial instruments contributed to the changes in the amount of allowance for ECL are presented in Note 4.4.9.

**4.4.9 Significant Changes in Gross Carrying Amount Affecting Allowance for ECL**

The tables below provides information how the significant changes in the gross carrying amount of financial instruments in 2019 contributed to the changes in the allowance for ECL.

a) *Loans and receivables – Group and Parent Company*

	<b>Corporate Loans</b>				
	<b>Stage 1</b>	<b>Stage 2</b>	<b>Stage 3</b>	<b>Purchased credit-impaired</b>	<b>Total</b>
<b>2019</b>					
Balance at beginning of year	P 254,802	P 2,856	P 10,462	P 52	P 268,172
Transfers:					
Stage 1 to Stage 2	( 1,666)	1,666	-	-	-
Stage 1 to Stage 3	( 831)	-	831	-	-
Stage 2 to Stage 3	-	( 8)	8	-	-
Assets derecognized or repaid	( 137,855)	( 2,319)	( 4,448)	-	( 144,622)
New assets originated:					
Remained in Stage 1	163,316	-	-	-	162,316
Moved to Stages 2 and 3	-	4,801	2,266	-	7,067
	<u>22,964</u>	<u>4,140</u>	<u>( 1,343)</u>	<u>-</u>	<u>24,761</u>
Balance at end of year	<b>P 277,766</b>	<b>P 6,996</b>	<b>P 9,119</b>	<b>P 52</b>	<b>P 292,933</b>
<b>2018</b>					
Balance at beginning of year	P 235,021	P 10,361	P 2,692	P 70	P 248,143
Transfers:					
Stage 1 to Stage 2	( 49)	49	-	-	-
Stage 1 to Stage 3	( 109)	-	109	-	-
Stage 2 to Stage 1	95	( 95)	-	-	-
Stage 3 to Stage 1	2	-	( 2)	-	-
Assets derecognized or repaid	( 118,573)	( 9,497)	( 980)	( 18)	( 129,067)
New assets originated:					
Remained in Stage 1	138,415	-	-	-	138,415
Moved to Stage 2 and 3	-	2,038	8,643	-	10,681
	<u>19,781</u>	<u>( 7,505)</u>	<u>7,770</u>	<u>( 18)</u>	<u>20,029</u>
Balance at end of year	<b>P 254,802</b>	<b>P 2,856</b>	<b>P 10,462</b>	<b>P 52</b>	<b>P 268,172</b>

	<b>Retail and Other Products</b>			
	<b>Stage 1</b>	<b>Stage 2</b>	<b>Stage 3</b>	<b>Total</b>
<b>2019</b>				
<b>Housing loans</b>				
Balance at beginning of year	P 41,561	P 4,998	P 797	P 47,356
Transfers:				
Stage 1 to Stage 2	( 3,635)	3,635	-	-
Stage 1 to Stage 3	( 583)	-	583	-
Stage 2 to Stage 3	-	( 1,281)	1,281	-
Stage 3 to Stage 2	-	5	( 5)	-
Stage 2 to Stage 1	1,176	( 1,176)	-	-
Assets derecognized or repaid	( 5,235)	( 1,168)	( 642)	( 7,045)
New assets originated:				
Remained in Stage 1	11,672	-	-	11,672
Moved to Stages 2 and 3	-	832	589	1,421
	<u>3,405</u>	<u>847</u>	<u>1,806</u>	<u>6,058</u>
<b>Balance at end of year</b>	<b>44,966</b>	<b>5,845</b>	<b>2,603</b>	<b>53,414</b>
<b>Credit cards</b>				
Balance at beginning of year	P 20,245	P 413	P 892	P 21,550
Transfers:				
Stage 1 to Stage 2	( 424)	424	-	-
Stage 1 to Stage 3	( 678)	-	678	-
Stage 2 to Stage 1	72	( 72)	-	-
Stage 2 to Stage 3	-	( 71)	71	-
Stage 3 to Stage 1	34	-	( 34)	-
Stage 3 to Stage 2	-	21	( 21)	-
New assets originated:				
Remained in Stage 1	94,718	-	-	94,718
Moved to Stage 2 and 3	-	978	1,184	2,162
Write-offs	( 690)	( 258)	( 611)	( 1,559)
Asset derecognized or repaid	( 84,167)	( 769)	( 892)	( 85,828)
	<u>8,865</u>	<u>253</u>	<u>375</u>	<u>9,493</u>
<b>Balance at end of year</b>	<b>29,110</b>	<b>666</b>	<b>1,267</b>	<b>31,043</b>
<b>Auto Loans</b>				
Balance at beginning of year	P 31,823	P 4,162	P 707	P 36,692
Transfers:				
Stage 1 to Stage 2	( 3,155)	3,155	-	-
Stage 1 to Stage 3	( 665)	-	665	-
Stage 2 to Stage 1	981	( 981)	-	-
Stage 2 to Stage 3	-	( 1,000)	1,000	-
Stage 3 to Stage 2	-	2	( 2)	-
New assets originated:				
Remained in Stage 1	7,358	-	-	7,358
Moved to Stage 2 and 3	-	765	178	943
Write-offs	-	( 74)	( 309)	( 383)
Asset derecognized or repaid	( 2,250)	( 853)	( 92)	( 3,195)
	<u>2,269</u>	<u>1,014</u>	<u>1,440</u>	<u>4,722</u>
<b>Balance at end of year</b>	<b>34,092</b>	<b>5,176</b>	<b>2,147</b>	<b>41,415</b>

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<b>Personal and salary loans</b>				
Balance at beginning of year	P 645	P 32	P 19	P 696
Transfers:				
Stage 1 to Stage 2	( 71)	71	-	-
Stage 1 to Stage 3	( 24)	-	24	-
Stage 2 to Stage 1	4	( 4)	-	-
Stage 2 to Stage 3	-	( 15)	15	-
New assets originated:				
Remained in Stage 1	667	-	-	667
Moved to Stage 2 and 3	-	60	11	71
Write-offs	-	-	( 16)	( 16)
Asset derecognized or repaid	( 223)	( 36)	( 11)	( 270)
	353	76	23	452
<b>Balance at end of year</b>	<b>998</b>	<b>108</b>	<b>42</b>	<b>1,148</b>
<b>Leasing and finance receivables</b>				
Balance at beginning of year	P 1,795	P 1,543	P 652	P 3,990
Transfers:				
Stage 1 to Stage 3	( 205)	-	205	-
Stage 2 to Stage 3	-	( 103)	103	-
New assets originated:				
Remained in Stage 1	1,745	-	-	1,745
Moved to Stages 2 and 3	-	1,294	374	1,668
Asset derecognized or repaid	( 1,444)	( 749)	( 765)	( 2,958)
	96	442	( 83)	455
<b>Balance at end of year</b>	<b>1,891</b>	<b>1,985</b>	<b>569</b>	<b>4,445</b>
<b>Microfinance and small business loans</b>				
Balance at beginning of year	P 1,098	P 41	P 82	P 1,221
Transfers:				
Stage 1 to Stage 2	( 20)	20	-	-
Stage 1 to Stage 3	( 3)	-	3	-
Stage 2 to Stage 1	9	( 9)	-	-
Stage 2 to Stage 3	-	( 3)	3	-
New assets originated:				
Remained in Stage 1	807	-	-	807
Moved to Stages 2 and 3	-	16	70	86
Write-offs	-	-	( 12)	( 12)
Asset derecognized or repaid	( 749)	( 36)	( 3)	( 788)
	44	( 12)	61	93
<b>Balance at end of year</b>	<b>1,142</b>	<b>29</b>	<b>143</b>	<b>1,314</b>
	<b>P 112,199</b>	<b>P 13,809</b>	<b>P 6,771</b>	<b>P 132,779</b>

\*Leasing and finance receivables are from RLFC

\*\*Micro and small business loans are from RMB

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<b>2018</b>				
<b>Housing loans</b>				
Balance at beginning of year	P 41,165	P 922	P 1,675	P 43,762
Transfers:				
Stage 1 to Stage 2	( 3,283)	3,283	-	-
Stage 1 to Stage 3	-	-	-	-
Stage 2 to Stage 1	394	( 394)	-	-
Stage 2 to Stage 3	-	( 2,020)	2,020	-
Stage 3 to Stage 2	-	2,115	( 2,115)	-
Assets derecognized or repaid	( 4,288)	( 1,136)	( 789)	( 6,213)
New assets originated:				
Remained in Stage 1	7,573	-	-	7,573
Moved to Stage 2 and 3	-	2,228	6	2,234
	396	4,076	( 878)	3,594
<b>Balance at end of year</b>	<b>41,561</b>	<b>4,998</b>	<b>797</b>	<b>47,356</b>
<b>Credit cards</b>				
Balance at beginning of year	15,488	478	439	16,405
Transfers:				
Stage 1 to Stage 2	( 300)	300	-	-
Stage 1 to Stage 3	( 490)	-	490	-
Stage 2 to Stage 1	39	( 39)	-	-
Stage 2 to Stage 3	-	( 83)	83	-
Stage 3 to Stage 1	14	-	( 14)	-
Stage 3 to Stage 2	-	42	( 42)	-
New assets originated:				
Remained in Stage 1	3,972	-	-	3,972
Moved to Stage 2 and 3	-	58	45	103
Write-offs	-	-	( 1,129)	( 1,129)
Others	1,522	( 343)	1,020	2,199
	4,757	( 65)	453	5,145
<b>Balance at end of year</b>	<b>20,245</b>	<b>413</b>	<b>892</b>	<b>21,550</b>



	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<i>Auto Loans</i>				
Balance at beginning of year	P 30,156	P 5,880	P 559	P 36,595
Transfers:				
Stage 1 to Stage 2	( 316)	316	-	-
Stage 1 to Stage 3	( 73)	-	73	-
Stage 2 to Stage 1	266	( 266)	-	-
Stage 2 to Stage 3	-	( 376)	376	-
New assets originated:				
Remained in Stage 1	2,788	-	-	2,788
Moved to Stage 2 and 3	-	1,961	-	1,961
Write-offs	-	-	( 53)	( 53)
Assets derecognized or repaid	( 998)	( 3,353)	( 248)	( 4,599)
	1,667	( 1,718)	148	97
Balance at end of year	31,823	4,162	707	36,692
<i>Personal and salary loans</i>				
Balance at beginning of year	P 381	P 17	P 52	P 450
Transfers:				
Stage 1 to Stage 2	( 23)	23	-	-
Stage 1 to Stage 3	( 358)	-	358	-
Stage 2 to Stage 3	-	( 130)	130	-
Stage 3 to Stage 2	-	507	( 507)	-
New assets originated:				
Remained in Stage 1	3,961	-	-	3,961
Moved to Stages 2 and 3	-	263	2	265
Write-offs	-	-	( 8)	( 8)
Asset derecognized or repaid	( 3,316)	( 648)	( 8)	( 3,972)
	264	15	( 33)	246
Balance at end of year	645	32	19	696
<i>Leasing and finance receivables*</i>				
Balance at beginning of year	P 1,395	P 1,403	P 344	P 3,142
Transfers:				
Stage 1 to Stage 2	( 215)	215	-	-
Stage 3 to Stage 2	-	11	( 11)	-
New assets originated:				
Remained in Stage 1	769	-	-	769
Moved to Stage 2 and 3	-	68	419	487
Write off	-	-	( 100)	( 100)
Asset derecognized or repaid	( 154)	( 154)	-	( 308)
	400	140	308	848
Balance at end of year	1,795	1,543	652	3,990

	Retail and Other Products			
	Stage 1	Stage 2	Stage 3	Total
<i>Microfinance and small business loans**</i>				
Balance at beginning of year	P 909	P 9	P 66	P 984
Transfers:				
Stage 1 to Stage 2	( 27)	27	-	-
Stage 2 to Stage 3	-	( 3)	3	-
New assets originated:				
Remained in Stage 1	879	-	-	879
Moved to Stage 2 and 3	-	20	44	64
Asset derecognized or repaid	( 663)	( 12)	( 31)	( 706)
	189	32	16	237
Balance at end of year	1,098	41	82	1,221
Balance at end of year	P 97,167	P 11,189	P 3,149	P 111,505

\*Leasing and finance receivables are from RLCF

\*\*Micro and small business loans are from RMB

The amounts of "Transfers to" include the changes in the ECL on the exposures transferred from one stage to another during the year.

Generally, the increase in the ECL allowances was driven by an increase in the gross size of the portfolio and movements between stages as a result of increase in credit risk and improvement in economic conditions.

The Group's receivables arising from salary loans are generally fully recoverable as those are collected through salary deductions, except for those receivables from resigned employees which were provided with full ECL allowance.

b) *Investment in debt securities at amortized cost and at FVOCI*

	Group		Parent Company	
	HTC	FVOCI	HTC	FVOCI
<b>2019</b>				
Balance at beginning of year	P 89,027	P 15,526	P 88,686	P 15,138
Assets purchased	128,062	143,095	126,480	140,237
Assets derecognized	( 116,025)	( 107,893)	( 114,898)	( 105,675)
Fair value gains	-	( 116)	-	( 116)
Balance at end of year	P 101,065	P 50,612	P 100,268	P 49,584

	Group		Parent Company (As restated)	
	HTC	FVOCI	HTC	FVOCI
<b>2018</b>				
Balance at beginning of year	P 60,068	P -	P 59,648	P -
Effect of adoption of PFRS 9 (see Note 2.2)	( 261)	415	35	-
Assets purchased	77,488	19,828	77,237	19,827
Assets derecognized	( 48,403)	( 4,866)	( 48,234)	( 4,838)
Fair value gains	-	149	-	149
Balance at end of year	P 89,027	P 15,526	P 88,686	P 15,138

#### 4.4.10 Collateral Held as Security and Other Credit Enhancements

The Group holds collateral against loans and advances to customers in the form of hold-out deposits, real estate mortgage, standby letters of credit or bank guaranty, government guaranty, chattel mortgage, assignment of receivables, pledge of equity securities, personal and corporate guaranty and other forms of security. Estimates of fair value are based on the value of collateral assessed at the time of borrowing and are generally updated annually.

Generally, collateral is not held over loans and advances to other banks, except when securities are held as part of reverse repurchase and securities borrowing arrangements. Collateral is not usually held against trading and investment securities, and no such collateral was held as of December 31, 2019 and 2018.

The estimated fair value of collateral and other security enhancements held against the loan portfolio as of December 31 are presented below.

	Group			
	Stage 1	Stage 2	Stage 3	Total
<b>2019</b>				
Real properties	P 273,269	P 19,945	P 5,185	P 298,399
Chattel	85,646	2,815	1,181	89,462
Hold-out deposits	8,465	410	16	8,891
Equity securities	23,537	395	7,072	31,004
Others	171,591	1,668	3,015	176,274
	<b>P 562,508</b>	<b>P 25,233</b>	<b>P 16,469</b>	<b>P 604,210</b>

	Group			
	Stage 1	Stage 2	Stage 3	Total
<b>2018</b>				
Real properties	P 229,742	P 19,220	P 4,458	P 253,960
Chattel	51,450	21,290	4,286	77,026
Hold-out deposits	9,175	21	620	9,816
Equity securities	6,437	-	-	6,437
Others	149,065	9,401	1,618	159,544
	<b>P 445,869</b>	<b>P 49,932</b>	<b>P 10,982</b>	<b>P 506,783</b>

	Parent Company			
	Stage 1	Stage 2	Stage 3	Total
<b>2019</b>				
Real properties	P 272,429	P 19,930	P 5,099	P 297,458
Chattel	83,734	2,802	989	87,525
Equity securities	23,537	395	7,072	31,004
Hold-out deposits	8,465	410	16	8,891
Others	167,768	1,623	2,594	171,985
	<b>P 555,933</b>	<b>P 25,160</b>	<b>P 15,770</b>	<b>P 596,863</b>
<b>2018 (As restated)</b>				
Real properties	P 229,264	P 19,220	P 4,395	P 253,419
Chattel	65,926	8,535	1,653	76,114
Hold-out deposits	9,175	21	274	9,470
Equity securities	6,437	-	-	6,437
Others	145,974	9,372	740	156,086
	<b>P 456,776</b>	<b>P 37,148</b>	<b>P 7,602</b>	<b>P 501,526</b>

The Group and the Parent Company have recognized certain properties arising from foreclosures in settlement of loan account amounting to P924 and P912, respectively, in 2019 and P672 and P818, respectively, in 2018 (see Note 14.1).

The Group and the Parent Company's manner of disposing the collateral for impaired loans and receivables is normally through sale of these assets after foreclosure proceedings have taken place. The Group and the Parent Company do not generally use the non-cash collateral for its own operations.

There were no changes in the Group and the Parent Company's collateral policies in 2019 and 2018.

#### 4.4.11 Maximum Exposure to Credit Risk of Financial Instruments not Subject to Impairment

The following table contains analysis of the maximum credit risk exposure from financial assets not subject to impairment (i.e., FVTPL).

	Group		Parent Company	
	2019	2018	2019	2018 (As restated – see Note 34)
Government securities	P 3,438	P 3,511	P 3,438	P 3,419
Corporate debt securities	287	1,657	287	1,547
Derivative financial assets	1,075	1,727	1,075	1,727
	<b>P 4,800</b>	<b>P 6,895</b>	<b>P 4,800</b>	<b>P 6,693</b>

#### 4.4.12 Write-offs

The Group and the Parent Company write off financial assets, in whole or in part, when it has exhausted all practical recovery efforts and has concluded that there is no reasonable expectation of recovery of the financial asset. Indicators that there is no reasonable expectation of recovery include: cessation of enforcement activity; and, where the Group and Parent Company's recovery method is through foreclosure of collateral and the value of the collateral is less than the outstanding contractual amounts of the financial assets to be written-off.

The Group and Parent Company may write off financial assets that are still subject to enforcement activity. The outstanding amounts of such assets written off in 2019 and 2018 amounted to P2,701 and P2,790 respectively, for the Group, and P2,689 and P1,469, respectively, for the Parent Company. The Group and the Parent Company still seek to recover amounts legally owed in full, but which have been partially written off due to no reasonable expectation of full recovery.

#### 4.4.13 Credit Risk Stress Test

To enhance the assessment of credit risk, the Group adopted a credit risk stress testing framework using break-even sales and cash flow debt service to determine a borrower's vulnerability and ultimately impact to the Group's capital adequacy. The Parent Company adopted a portfolio credit risk testing framework that takes into consideration the causal relationships among industry sectors.

#### 4.4.14 Sensitivity Analysis on ECL Measurement

Set out below are the changes to the Group's ECL as of December 31, 2019 that would result from reasonably possible changes in these parameters from the actual assumptions used in the Group's economic variable assumptions:

	Change in MEVs		Impact on ECL	
	Upside Scenario	Downside Scenario	Upside Scenario	Downside Scenario
Credit card receivables			(P 772)	P 114
Unemployment rate	- 2.75%	+ 4.25%		
Inflation rate	- 6.60%	+ 1.10%		
Corporate loans			( 447)	337
GDP growth rate	+ 0.70%	- 1.40%		
Inflation rate	- 3.61%	+ 3.49%		
91D TD bill	- 3.81%	+1.00%		
Salary loans			( 34)	3
Unemployment rate	- 2.50%	+ 4.50%		
USD-Php exchange rate	- P10.50	+ P3.00		
Inflation rate	- 0.50%	+ 2.50%		
Bank lending rate	- 0.50%	+ 5.00%		
Housing loans			( 23)	65
Unemployment rate	- 2.00%	+ 4.50%		
Inflation rate	- 0.50%	+ 2.50 %		
Bank lending rate	- 0.50%	+ 5.00%		
Auto loans			( 10)	47
GDP	+ P12,470	- P162,112		
USD-Php exchange rate	- P3.00	+ P10.50		
Bank lending rate	- 0.01%	+ 0.05%		
Personal loans			( 7)	28
GDP	+ P12,470	- P162,112		
USD-Php exchange rate	- P3.00	+ P10.50		
Bank lending rate	- 0.01%	+ 0.05%		

## 4.5 Operational Risk

Operational risks are risks arising from the potential inadequate information systems and systems, operations or transactional problems (relating to service or product delivery), breaches in internal controls, fraud, or unforeseen catastrophes that may result in unexpected loss. Operational risks include the risk of loss arising from various types of human or technical error, settlement or payments failures, business interruption, administrative and legal risks, and the risk arising from systems not performing adequately.

The Operational Risk Management Division (ORMD) assists management in meeting its responsibility to understand and manage operational risk exposures and to ensure consistent application of operational risk management tools across the Group.

The ORMD applies a number of techniques to efficiently manage operational risks. Among these are as follows:

- Each major business line has an embedded designated operational risk officer who acts as a point person for the implementation of various operational risk tools. The operational risk officers attend annual risk briefings conducted by the ORMD to keep them up-to-date with different operational risk issues, challenges and initiatives;
- With ORMD's bottom up self-assessment process, which is conducted at least annually, areas with high risk potential are highlighted and reported, and control measures are identified. The result of said self-assessment exercise also serves as one of the inputs in identifying specific key risk indicators (KRIs);
- KRIs are used to monitor the operational risk profile of the Group and of each business unit, and alert management of impending problems in a timely fashion;
- Internal loss information is collected, reported, and utilized to model operational risk; and,
- The ORMD reviews product and operating manuals, policies, procedures and circulars, thus allowing the embedding of desired operational risk management practices in all business units.

Operational Risk Management, as it relates to capital adequacy, is currently under Basic Indicator Approach (see Note 5.2).

The Group has also developed a Business Continuity Plan (BCP) based on several crisis severity levels which is tested at least annually and updated for any major changes in systems and procedures. Central to the Group's BCP is a disaster recovery plan to address the continued functioning of systems, recovery of critical data, and contingency processing requirements in the event of a disaster.

### 4.5.1 Reputation Risk

Reputation risk is the risk to earnings or capital arising from negative public opinion. This affects the Group's ability to establish new relationships or services, or to continue servicing existing relationships. This risk can expose the Group to litigation, financial loss, or damage to its reputation. Reputation risk arises whenever technology-based banking products, services, delivery channels, or processes may generate adverse public opinion such that it seriously affects the Group's earnings or impairs its capital. This risk is present in activities such as asset management and regulatory compliance.

The Group adopted a reputation risk monitoring and reporting framework to manage public perception. Central to the said framework is the creation of the RCBC Marketing Council chaired by the head of the Parent Company's Chief Marketing Officer.

#### **4.5.2 Legal Risk and Regulatory Risk Management**

Changes in laws and regulations and fiscal policies could adversely affect the Group's operations and financial reporting. In addition, the Group faces legal risks in enforcing its rights under its loan agreements, such as foreclosing of collateral. Legal risk is higher in new areas of business where the law remains untested by the courts. The Group uses a legal review process as the primary control mechanism for legal risk. Such a legal review aims to verify and validate the existence, genuineness and due execution of legal documents, and verify the capacity and authority of counterparties and customers to enter into transactions. In addition, the Group seeks to minimize its legal risk by using stringent legal documentation, imposing certain requirements designed to ensure that transactions are properly authorized, and consulting internal and external legal advisors.

Regulatory risk refers to the potential for the Group to suffer financial loss due to mid-stream changes in regulatory regime affecting current position and/or strategy. Compliance Risk is the risk of loss resulting from failure to comply with laws, regulations, rules, related self-regulatory organization standards, and codes of conduct applicable to its banking activities. The Group's Compliance Program, the design and implementation of which is overseen and coordinated by the Chief Compliance Officer, is the primary control process for regulatory and compliance risk issues. The Compliance Office is committed to safeguard the integrity of the Group by maintaining a high level of regulatory compliance. It is responsible for communicating and disseminating new rules and regulations to all units, assessing and addressing identified compliance issues, performing periodic compliance testing and reporting compliance findings to the Audit and Compliance Committee and the BOD.

#### **4.6 Anti-Money Laundering Controls**

The AMLA or RA No. 9160 was passed in September 2001. It was subsequently amended by RA No. 9194, RA No. 10167, and RA No. 10365 in March 2003, June 2012 and February 2013, respectively. Together with the Terrorism Financing Prevention and Suppression Act (CFT) which was passed in June 2012 by virtue of RA No. 10168, these laws provide the regulatory framework for the Philippine Anti-Money Laundering and Terrorist Financing Prevention regulations.

On January 27, 2011, BSP Circular No. 706 (the Circular) was implemented superseding prior rules and regulations on AMLA. The Circular requires the Group to adopt a comprehensive and risk-based Money Laundering and Terrorist Financing Prevention Program (MTTP) designed according to the covered institution's corporate structure and risk profile. In compliance with the risk-based approach mandated by the Circular, the Group profiles its clients based on their level of risk, specifically, Low, Normal, or High. These risk levels have their corresponding level of due diligence, specifically, Reduced, Average or Enhanced. BSP Circular No. 706 was later amended by BSP Circular Nos. 950 and 1022.

The salient changes in the MORB in light of BSP Circular No. 1022 includes the definition of a beneficial owner, expansion of the definition of Politically Exposed Persons or PEPs to include persons who are related to a PEP within the second degree of affinity and consanguinity, mandatory conduct of an institutional risk assessment ("IRA") every two years, adoption of procedures on sanctions screening, among others.

The Group's MTTP follows a risk-based approach wherein enhanced controls are applied on certain aspects of the business that pose higher ML/TF risks in order to mitigate the same.

The Bank strengthened its first line of defense by separating sales and service functions and delineated the reporting line of said functions. The Sales function is focused on marketing and sales, relationship management, cross-selling, credit-related matters and documentation, and loan-related referrals and documentation; while the Service function is focused on BC operations such as: (a) customer servicing, which includes KYC and account opening, account maintenance and tellering, cash and vault management and ATM servicing, (b) BC administration, (c) customer experience management such as inquiries, feedback and problem resolution, and (d) compliance and audit.

The Bank also created middle offices, Customer Information Management Division (CIMD) and Branch Operations Control Division (BOCD), tasked to review and validate KYC documents. The CIMD ensures the uniqueness of Customer Information Files and accuracy of information captured in the CRM. It also reviews the completeness of account opening documents. The BOCD, on the other hand, ensures the proper implementation of KYC, the performance of independent EDD based on customer risk profile, and monitoring adherence of BCs to standard operating procedures. It also acts as the additional control layer to track exceptions and decides on dispositions, recommends sanctions or additional trainings for BCs, and recommends process improvements. The key processes of the BOCD are KYC, exceptions reporting, and quality assurance.

The Bank implemented automated client risk profiling through its Finacle CRM. The risk assessment process involves a detailed analysis of the data obtained during the identification stage in order to more accurately determine whether the customer poses a low, medium or high risk for money laundering/terrorism financing.

In order to manage the risks of some of its higher risk customers like Money Service Businesses and Online Gambling Businesses, the Bank established a Special Handling Unit ("SHU") responsible in the conduct of EDD, account review and transaction monitoring of said clients.

The Bank also uses technology to automate its compliance activities and to equip itself with improved defenses against money laundering and terrorist financing. It uses watch list filtering, transaction monitoring and automated regulatory reporting systems..

The Group's Chief Compliance Officer, through the Testing and Monitoring Division, monitors AML/CFT compliance by conducting regular compliance testing of the head office and business units. Results of its AML/CFT activities and compliance monitoring are regularly reported to the AML Board Committee, Audit and Compliance Committee and the BOD to ensure that all AML/CFT matters are appropriately escalated.

In summary, the Group continuously improved controls over Money Laundering risks and had implemented the necessary enhancements of the on-boarding procedures, risk profiling model, transaction processing and monitoring, covered and suspicious transaction reporting and watchlist management.

## **5. CAPITAL MANAGEMENT**

### **5.1 Regulatory Capital**

The Group's lead regulator, the BSP, sets and monitors the capital requirements of the Group.

In implementing the current capital requirements, the BSP requires the Group to maintain a prescribed ratio of qualifying regulatory capital to total risk-weighted assets including market risk and operational risk computed based on BSP-prescribed formula provided under its circulars.

On January 15, 2013, the BSP issued Circular No. 781, *Basel III Implementing Guidelines on Minimum Requirements*, which provides the implementing guidelines on the revised risk-based capital adequacy requirements particularly on the minimum capital and disclosure requirements for universal banks and commercial banks as well as their subsidiary banks and quasi-banks, in accordance with the Basel III standards. Circular No. 781 is effective on January 1, 2014.

The BSP has adopted the Basel III risk-based capital adequacy framework effective January 1, 2014, which requires the Group to maintain at all times the following:

- (a) Common Equity Tier 1 (CET1) of at least 6.0% of risk-weighted assets;
- (b) Tier 1 Capital of at least 7.5% of risk-weighted assets;
- (c) Qualifying Capital (Tier 1 plus Tier 2 Capital) of at least 10.0% of risk-weighted assets; and,
- (d) Capital Conservation Buffer of 2.5% of risk-weighted assets, comprised of CET1 Capital.

Under the relevant provisions of the current BSP regulations, the required minimum capitalization for the Parent Company, RSB, Rizal Microbank, RCBC Capital and RCBC LFC is P20,000, P2,000, P400, P300 and P300, respectively.

In computing for the capital adequacy ratio (CAR), the regulatory qualifying capital is analyzed into two tiers which are: (i) Tier 1 Capital comprised of CET1 and Additional Tier 1 (AT1) capital, and, (ii) Tier 2 Capital, defined as follows and are subject to deductions as defined in relevant regulations:

(a) CET1 Capital includes the following:

- (i) paid-up common stock;
- (ii) common stock dividends distributable;
- (iii) additional paid-in capital;
- (iv) deposit for common stock subscription;
- (v) retained earnings;
- (vi) undivided profits;
- (vii) other comprehensive income from net unrealized gains or losses on financial assets at FVOCI and cumulative foreign currency translation; and,
- (viii) minority interest in subsidiary banks which are less than wholly-owned, subject to regulatory conditions.

(b) AT1 Capital includes:

- (i) instruments that do not qualify as CET1, but meet the criteria set out in Annex B of BSP Circular 781;
- (ii) financial liabilities meeting loss absorbency requirements set out in Annex E of BSP Circular 781;
- (iii) financial liabilities bearing loss absorbency features at point of non-viability as set out in Annex F of BSP Circular 781;
- (iv) additional paid-in capital resulting from issuance of AT1 capital;
- (v) deposit for subscription to AT1 instruments; and,
- (vi) minority interest in subsidiary banks which are less than wholly-owned, subject to regulatory conditions.

(c) Tier 2 Capital includes:

- (i) instruments issued that are not qualified as Tier 1 capital but meet the criteria set forth in Annex C of BSP Circular 781;
- (ii) financial liabilities bearing loss absorbency features at point of non-viability as set out in Annex F of BSP Circular 781;
- (iii) deposit for subscription of Tier 2 capital;
- (iv) appraisal increment reserve on bank premises, as authorized by the Monetary Board (MB) of the BSP;
- (v) general loan loss provisions; and,
- (vi) minority interest in subsidiary banks that are less than wholly-owned, subject to regulatory conditions.

In the calculation of Risk-based CAR, the total Qualifying Capital is expressed as a percentage of Total Risk-Weighted Assets based on book exposures, where Risk Weighted Assets is composed of Credit Risk, Market Risk and Operational Risk, net of specific provisions and exposures covered by credit risk mitigation (CRM).

Banking book exposures shall be risk-weighted based on third party credit assessment of the individual exposure given by eligible external credit institutions and the corresponding external credit assessment are mapped with the corresponding risk weights following the Standardized Credit Risk Weights table as provided under BSP Circular 538, *Revised Risk-Based Capital Adequacy Framework*.

BSP Circular No. 856, *Implementing Guidelines on the Framework for Dealing with Domestic Systemically Important Banks under Basel III*, covers the implementing guidelines on the framework for dealing with domestic systemically important banks (D-SIBs) in accordance with the Basel III standards. Banks identified as D-SIBs shall be required to have higher loss absorbency, on top of the minimum CET1 capital and capital conservation buffer. Compliance with this requirement was phased-in starting January 1, 2017, with full compliance on January 1, 2019.

The Group and Parent Company's regulatory capital position based on the Basel III risk-based capital adequacy framework as reported to the BSP follows:

	<u>Group</u>	<u>Parent Company</u>
<b>2019:</b>		
Tier 1 Capital		
CET 1	<b>P 70,153</b>	<b>P 64,997</b>
AT1	<u>3</u>	<u>3</u>
	<b>70,156</b>	<b>65,000</b>
Tier 2 Capital	<u>4,701</u>	<u>4,614</u>
Total Qualifying Capital	<b>P 74,857</b>	<b>P 69,614</b>
Total Risk – Weighted Assets	<b>P 544,143</b>	<b>P 528,786</b>
Capital ratios:		
Total qualifying capital expressed as a percentage of total risk-weighted assets	<b>13.76%</b>	<b>13.16%</b>
Tier 1 Capital Ratio	<b>12.89%</b>	<b>12.29%</b>
Total CET 1 Ratio	<b>12.89%</b>	<b>12.29%</b>



	<u>Group</u>	<u>Parent Company</u>
2018:		
Tier 1 Capital		
CET 1	P 67,539	P 53,512
AT1	<u>3</u>	<u>3</u>
	67,542	53,515
Tier 2 Capital	<u>13,871</u>	<u>13,173</u>
Total Qualifying Capital	<u>P 81,413</u>	<u>P 66,688</u>
Total Risk – Weighted Assets	<u>P 504,657</u>	<u>P 404,136</u>
Capital ratios:		
Total qualifying capital expressed as a percentage of total risk-weighted assets	16.13%	16.50%
Tier 1 Capital Ratio	13.38%	13.24%
Total CET 1 Ratio	13.38%	13.24%

The foregoing capital ratios comply with the related BSP prescribed ratios.

## 5.2 Internal Capital Adequacy Assessment and Pillar 2 Risk-Weighted Assets

In January 2009, the BSP issued Circular No. 639 on the ICAAP and Supervisory Review Process covering universal and commercial banks on a group-wide basis. As a supplement to BSP Circular No. 538 on the Risk-Based Capital Adequacy Framework, ICAAP sets out the following principles:

- Banks must have a process for assessing capital adequacy relative to their risk profile, operating environment, and strategic/business plans;
- The Bank's ICAAP is the responsibility of the BOD, must be properly documented and approved and with policies and methodologies integrated into banking operations;
- The Bank's ICAAP should address other material risks – Pillar 2 risks – in addition to those covered by Pillar 1, with risk measurement methodologies linked to the assessment of corresponding capital requirement both on a business-as-usual (BAU) and stressed scenario;
- The minimum CAR prescribed by the BSP after accounting for Pillar 1 and other risks is retained at 10%; and,
- The Bank's ICAAP document must be submitted to the BSP every January 31 of each year, beginning 2011.

The Group identified the following Pillar 2 risks as material to its operations, and consequently set out methodologies to quantify the level of capital that it must hold.

- Credit Risk Concentration** – The Group has so far limited its analysis to credit risk concentration arising from the uneven sector distribution of the Group's credit exposures. Aside from using a simplified application of the HHI, concentration is estimated using the Comprehensive Concentration Index (CCI). The capital charge is estimated by calculating the change in the Economic Capital (EC) requirement of the credit portfolio as an effect of credit deterioration in the largest industry exposure.
- Interest Rate Risk in the Banking Book (IRRBB)** – It is the current and prospective negative impact on earnings and capital arising from interest rate shifts. The Group IRRBB estimates as its NII-at-risk, and accordingly deducts the same from regulatory qualifying capital. Stressed IRRBB is calculated by applying the highest observed market volatilities over a determined timeframe.
- Liquidity Risk** – The Group estimates its liquidity risk under BAU scenario using standard gap analysis. Stressed liquidity risk on the other hand assumes a repeat of a historical liquidity stress, and estimates the impact if the Group were to partially defend its deposits and partially pay-off by drawing from its reserve of liquid assets.

- Information Technology (IT) Risk** – It is the current and prospective negative impact to earnings arising from failure of IT systems and realization of cyber security threats. The Group treats this risk as forming part of Operational Risk.
- Compliance Risk** – It is the current and prospective negative impact on earnings and capital arising from violation of laws, regulations, ethical standards, and the like. For BAU scenario, the Group estimates compliance risk charge from historical fines and penalties as the worst-case loss determined via a frequency-severity analysis of each penalty type. The resulting compliance risk charge calculation is likewise directly deducted from earnings.
- Strategic Business Risk** – It is the current and prospective negative impact on earnings and capital arising from adverse business decisions, improper implementation, and failure to respond to industry changes. The Group treats strategic business risk as a catch-all risk, and expresses its estimate as a cap on additional risk-weighted assets given other risks and the desired level of capital adequacy. The Group maintains that the assessment of strategic risk is embedded in the budget of the Group. Its capital impact therefore on a BAU case is already expressed in the amount of risk projected to be taken on in the forecast years. However, the Group does recognize the need to set up processes that would enable to put a number to the risk incurred by going into specific strategies.
- Reputation Risk** – From the adoption of a theoretical measure, the Group amended its approach to reputation risk in 2011 by adopting instead a reputation risk monitoring and reporting process, run primarily by its Public Relations Committee. The measurement of reputation risk under stress is folded into the Group's assessment of stressed liquidity risk.

## 5.3 Basel III Leverage Ratio

BSP issued Circular No. 881, *Implementing Guidelines on the Basel III Leverage Ratio Framework*, which provides the implementing guidelines on the leverage ratio framework designed to act as a supplementary measure to the risk-based capital requirements. It sets out a minimum leverage ratio of 5.00% on a solo and consolidated basis and shall be complied with at all times. The monitoring period has been set every quarter starting December 31, 2014 and extended until June 30, 2018 per BSP Circular No. 990, *Amendments to the Basel III Leverage Ratio Framework*, issued on January 22, 2018. Effective July 1, 2018, the monitoring of the leverage ratio was implemented as a Pillar I minimum requirement.

The Basel III leverage ratio intends to restrict the build-up of leverage to avoid destabilizing deleveraging processes which can damage the broader financial system and the economy. Likewise, it reinforces the risk-based requirements with a simple, non-risk based “backstop” measure. The Basel III leverage ratio is defined as the ratio of capital measure (Tier 1 Capital) and the exposure measure. Exposure measure includes: on-balance sheet exposures, securities financing transactions exposures and off-balance sheet.

The Group and Parent Company's Basel III leverage ratio as reported to the BSP are as follows:

	<u>Group</u>	<u>Parent Company</u>
<b>2019</b>		
Tier 1 Capital	<b>P 70,156</b>	<b>P 65,000</b>
Exposure measure	<u><b>776,949</b></u>	<u><b>762,697</b></u>
	<u><b>9.03%</b></u>	<u><b>8.52%</b></u>
<b>2018 :</b>		
Tier 1 Capital	<b>P 67,542</b>	<b>P 53,515</b>
Exposure measure	<u><b>661,017</b></u>	<u><b>512,466</b></u>
	<u><b>10.22%</b></u>	<u><b>10.44%</b></u>

## 6. CATEGORIES AND OFFSETTING OF FINANCIAL ASSETS AND FINANCIAL LIABILITIES

### 6.1 Carrying Amounts and Fair Values by Category

The following table summarizes the carrying amounts and corresponding fair values of financial assets and financial liabilities presented in the statements of financial position.

	Group			
	2019		2018	
	Carrying Amount	Fair Value	Carrying Amount	Fair Value
<b>Financial Assets</b>				
At amortized cost:				
Cash and cash equivalents	P 147,551	P 147,551	P 113,783	P 113,783
Investment securities - net	100,926	101,455	88,892	86,876
Loans and receivables - net	430,416	449,822	388,778	401,745
Other resources	898	898	985	985
	<u>679,791</u>	<u>699,726</u>	<u>592,438</u>	<u>603,389</u>
At fair value:				
Investment securities at FVTPL	5,548	5,548	7,570	7,570
Investment securities at FVOCI	54,245	54,245	21,987	21,987
	<u>59,793</u>	<u>59,793</u>	<u>29,557</u>	<u>29,557</u>
	<u>P 739,584</u>	<u>P 759,519</u>	<u>P 621,995</u>	<u>P 632,946</u>
<b>Financial Liabilities</b>				
At amortized cost:				
Deposit liabilities	P 456,581	P 458,303	P 423,399	P 424,437
Bills payable	101,606	101,606	56,001	56,001
Bonds payable	96,814	84,925	53,090	55,281
Subordinated debt	-	-	9,986	9,955
Accrued interest and other expenses	6,019	6,019	4,984	4,984
Other liabilities	17,351	17,351	11,944	11,944
	<u>678,371</u>	<u>668,204</u>	<u>559,404</u>	<u>562,602</u>
At fair value –				
Derivative financial liabilities	863	863	894	894
	<u>P 679,234</u>	<u>P 669,067</u>	<u>P 560,298</u>	<u>P 563,496</u>
	Parent Company			
	2019		2018 (As restated)	
	Carrying Amount	Fair Value	Carrying Amount	Fair Value
<b>Financial Assets</b>				
At amortized cost:				
Cash and cash equivalents	P 145,769	P 145,769	P 111,787	P 111,787
Investment securities - net	100,219	100,682	88,641	85,514
Loans and receivables - net	422,682	442,088	382,568	394,069
Other resources	896	896	982	982
	<u>669,566</u>	<u>689,435</u>	<u>583,978</u>	<u>592,352</u>
At fair value:				
Investment securities at FVTPL	4,800	4,800	6,693	6,693
Investment securities at FVOCI	52,425	52,425	18,815	18,815
	<u>57,225</u>	<u>57,225</u>	<u>25,508</u>	<u>25,508</u>
	<u>P 726,791</u>	<u>P 746,660</u>	<u>P 609,486</u>	<u>P 617,860</u>

	Parent Company			
	2019		2018 (As restated)	
	Carrying Amount	Fair Value	Carrying Amount	Fair Value
<b>Financial Liabilities</b>				
At amortized cost:				
Deposit liabilities	P 456,593	P 456,593	P 423,529	P 426,169
Bills payable	93,938	93,938	48,759	48,759
Bonds payable	96,814	84,925	53,090	55,281
Subordinated debt	-	-	9,986	9,955
Accrued interest and other expenses	5,758	5,758	4,834	4,834
Other liabilities	16,553	16,553	11,013	11,013
	<u>669,656</u>	<u>657,767</u>	<u>551,211</u>	<u>556,011</u>
At fair value –				
Derivative financial liabilities	863	863	894	894
	<u>P 670,519</u>	<u>P 658,630</u>	<u>P 552,105</u>	<u>P 556,905</u>

Except for investment securities at amortized cost, bonds payable and subordinated debt with fair value disclosed different from their carrying amounts, management considers that the carrying amounts of other financial assets and financial liabilities presented above which are measured at amortized cost, approximate the fair values either because those instruments are short-term in nature or the effect of discounting for those with maturities of more than one year is not material. The fair value information disclosed for the Group and Parent Company's investment securities at amortized cost and other financial assets and liabilities measured at fair value on a recurring basis are determined based on the procedures and methodologies discussed in Note 7.2.

### 6.2 Offsetting Financial Assets and Financial Liabilities

The following financial assets presented in the statements of financial position at gross amounts are covered by enforceable master netting arrangements and similar arrangements:

	Notes	Group			
		Gross amounts recognized in the statements of financial position	Related amounts not set off in the statements of financial position		Net amount
			Financial instruments	Collateral received	
<b>December 31, 2019</b>					
Loans and receivables – Receivable from customers	11	P 434,263	(P 8,891)	P -	P 425,372
Trading and investment securities – Investment securities at amortized cost	10	100,926	( 75,771)	-	25,155
Other resources – Margin deposits	15	40	-	( 40)	-
<b>December 31, 2018</b>					
Loans and receivables – Receivable from customers	11	P 389,073	(P 9,814)	(P 6,437)	P 372,822
Trading and investment securities – Investment securities at amortized cost	10	88,892	( 20,653)	-	68,239
Other resources – Margin deposits	15	19	-	( 19)	-

Parent Company						
Notes	Gross amounts recognized in the statements of financial position	Related amounts not set off in the statements of financial position		Net amount		
		Financial instruments	Collateral received			
<b>December 31, 2019</b>						
Loans and receivables – Receivable from customers	11	P 426,002	(P 8,891)	P -	P 417,111	
Trading and investment securities – Investment securities at amortized cost	10	100,219	( 75,771)	-	24,448	
Other resources – Margin deposits	15	40	-	( 40)	-	
<b>December 31, 2018</b> <i>(As restated)</i>						
Loans and receivables – Receivable from customers	11	P 382,637	(P 9,814)	P -	P 372,823	
Trading and investment securities – Investment securities at amortized cost	10	88,641	( 20,653)	-	67,988	
Other resources – Margin deposits	15	19	-	( 19)	-	

The following financial liabilities presented in the statements of financial position at gross amounts are covered by enforceable master netting arrangements and similar agreements:

Group						
Notes	Gross amounts recognized in the statements of financial position	Related amounts not set off in the statements of financial position		Net amount		
		Financial instruments	Collateral received			
<b>December 31, 2019</b>						
Deposit liabilities	17	P 456,581	(P 8,891)	P -	P 447,690	
Bills payable	18	101,606	( 75,771)	-	25,835	
Other liabilities – Derivative financial liabilities	22	863	-	( 40)	823	
<b>December 31, 2018</b>						
Deposit liabilities	17	P 423,399	(P 9,814)	P -	P 413,585	
Bills payable	18	56,001	( 20,653)	-	35,348	
Other liabilities – Derivative financial liabilities	22	894	-	( 862)	32	
Parent Company						
Notes	Gross amounts recognized in the statements of financial position	Related amounts not set off in the statements of financial position		Net amount		
		Financial instruments	Collateral received			
<b>December 31, 2019</b>						
Deposit liabilities	17	P 456,593	(P 8,891)	P -	P 447,702	
Bills payable	18	93,938	( 75,771)	-	18,167	
Other liabilities – Derivative financial liabilities	22	863	-	( 40)	823	

Parent Company						
Notes	Gross amounts recognized in the statements of financial position	Related amounts not set off in the statements of financial position		Net amount		
		Financial instruments	Collateral received			
<b>December 31, 2018</b> <i>(As restated)</i>						
Deposit liabilities	17	P 423,529	(P 9,814)	P -	P 413,715	
Bills payable	18	48,759	( 20,653)	-	28,106	
Other liabilities – Derivative financial liabilities	22	894	-	( 19)	875	

For financial assets and financial liabilities subject to enforceable master netting agreements or similar arrangements above, each agreement between the Group and its counterparties allows for net settlement of the relevant financial assets and liabilities when both elect to settle on a net basis. In the absence of such an election, financial assets and liabilities will be settled on a gross basis. However, each party to the master netting agreement or similar agreement will have the option to settle all such amounts on a net basis in the event of default of the other party.

For purposes of presenting the above information, the related amounts not set off in the statements of financial position pertains to: (a) hold-out deposits and equity securities which serve as the Group's collateral enhancement for certain loans and receivables; (b) collateralized bills payable under sale and repurchase agreements; and, (c) margin deposits which serve as security for outstanding financial market transactions and other liabilities. The financial instruments that can be set off are only disclosed to the extent of the amounts of the Group's obligations to counterparties.

## 7. FAIR VALUE MEASUREMENT AND DISCLOSURES

### 7.1 Fair Value Hierarchy

In accordance with PFRS 13, *Fair Value Measurement*, the fair value of financial assets and financial liabilities and non-financial assets which are measured at fair value on a recurring or non-recurring basis and those assets and liabilities not measured at fair value but for which fair value is disclosed in accordance with other relevant PFRS, are categorized into three levels based on the significance of inputs used to measure the fair value.

The fair value hierarchy has the following levels:

- Level 1: quoted prices (unadjusted) in active markets for identical assets or liabilities that an entity can access at the measurement date;
- Level 2: inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (i.e., as prices) or indirectly (i.e., derived from prices); and,
- Level 3: inputs for the asset or liability that are not based on observable market data (unobservable inputs).

The level within which the asset or liability is classified is determined based on the lowest level of significant input to the fair value measurement.

For purposes of determining the market value at Level 1, a market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis.

For investments which do not have quoted market price, the fair value is determined by using generally acceptable pricing models and valuation techniques or by reference to the current market value of another instrument which is substantially the same after taking into account the related credit risk of counterparties, or is calculated based on the expected cash flows of the underlying net asset base of the instrument.

When the Group uses valuation technique, it maximizes the use of observable market data where it is available and rely as little as possible on entity specific estimates. However, areas such as credit risk (both own and counterparty), volatilities and correlations require management to make estimates. If all significant inputs required to determine the fair value of an instrument are observable, the instrument is included in Level 2. Otherwise, it is included in Level 3. Changes in assumptions could also affect the reported fair value of the financial instruments. The Group uses judgment to select a variety of valuation techniques and to make assumptions that are mainly based on market conditions existing at the end of each reporting period.

## 7.2 Financial Instruments Measured at Fair Value

The table below shows the fair value hierarchy of the Group's classes of financial assets and financial liabilities measured at fair value in the statements of financial position on a recurring basis as of December 31, 2019 and 2018.

	Group			
	Level 1	Level 2	Level 3	Total
<b>2019:</b>				
<b>Financial assets at FVTPL:</b>				
Government securities	P 3,438	P -	P -	P 3,438
Corporate debt securities	287	-	-	287
Equity securities	748	-	-	748
Derivative assets	16	1,059	-	1,075
	<u>4,489</u>	<u>1,059</u>	<u>-</u>	<u>5,548</u>
<b>Financial assets at FVOCI:</b>				
Equity securities	1,773	248	1,612	3,633
Government securities	43,281	-	-	43,281
Corporate debt securities	7,331	-	-	7,331
	<u>52,385</u>	<u>248</u>	<u>1,612</u>	<u>54,245</u>
<b>Total Resources at Fair Value</b>	<b><u>P 56,874</u></b>	<b><u>P 1,307</u></b>	<b><u>P 1,612</u></b>	<b><u>P 59,793</u></b>
<b>Derivative liabilities</b>	<b><u>P -</u></b>	<b><u>P 863</u></b>	<b><u>P -</u></b>	<b><u>P 863</u></b>
	Group			
	Level 1	Level 2	Level 3	Total
<b>2018:</b>				
<b>Financial assets at FVTPL:</b>				
Government securities	P 3,511	P -	P -	P 3,511
Corporate debt securities	1,657	-	-	1,657
Equity securities	675	-	-	675
Derivative assets	-	1,727	-	1,727
	<u>5,846</u>	<u>1,727</u>	<u>-</u>	<u>7,573</u>

	Group			
	Level 1	Level 2	Level 3	Total
<b>Financial assets at FVOCI:</b>				
Equity securities	2,045	427	3,989	6,461
Government securities	15,138	-	-	15,138
Corporate debt securities	388	-	-	388
	<u>17,571</u>	<u>427</u>	<u>3,989</u>	<u>21,987</u>
<b>Total Resources at Fair Value</b>	<b><u>P 23,417</u></b>	<b><u>P 2,154</u></b>	<b><u>P 3,989</u></b>	<b><u>P 29,557</u></b>
<b>Derivative liabilities</b>	<b><u>P -</u></b>	<b><u>P 894</u></b>	<b><u>P -</u></b>	<b><u>P 894</u></b>

	Parent Company			
	Level 1	Level 2	Level 3	Total
<b>2019:</b>				
<b>Financial assets at FVTPL:</b>				
Government securities	P 3,438	P -	P -	P 3,438
Corporate debt securities	287	-	-	287
Derivative assets	16	1,059	-	1,075
	<u>3,741</u>	<u>1,059</u>	<u>-</u>	<u>4,800</u>
<b>Financial assets at FVOCI:</b>				
Equity securities	1,015	245	1,581	2,841
Government securities	43,281	-	-	43,281
Corporate debt securities	6,303	-	-	6,303
	<u>50,599</u>	<u>245</u>	<u>1,581</u>	<u>52,425</u>
<b>Total Resources at Fair Value</b>	<b><u>P 54,340</u></b>	<b><u>P 1,304</u></b>	<b><u>P 1,581</u></b>	<b><u>P 57,225</u></b>
<b>Derivative liabilities</b>	<b><u>P -</u></b>	<b><u>P 863</u></b>	<b><u>P -</u></b>	<b><u>P 863</u></b>
<b>2018 (As restated):</b>				
<b>Financial assets at FVTPL:</b>				
Government securities	P 3,419	P -	P -	P 3,419
Corporate debt securities	1,547	-	-	1,547
Derivative assets	-	1,727	-	1,727
	<u>4,966</u>	<u>1,727</u>	<u>-</u>	<u>6,693</u>
<b>Financial assets at FVOCI:</b>				
Equity securities	1,476	255	1,946	3,677
Government securities	15,138	-	-	15,138
	<u>16,614</u>	<u>255</u>	<u>1,946</u>	<u>18,815</u>
<b>Total Resources at Fair Value</b>	<b><u>P 21,580</u></b>	<b><u>P 255</u></b>	<b><u>P 1,946</u></b>	<b><u>P 23,781</u></b>
<b>Derivative liabilities</b>	<b><u>P -</u></b>	<b><u>P 894</u></b>	<b><u>P -</u></b>	<b><u>P 894</u></b>

Described below are the information about how the fair values of the Group's classes of financial assets and financial liabilities were determined.

(a) *Government and Corporate Debt Securities*

The fair value of the Group's government and corporate debt securities are categorized within Level 1 of the fair value hierarchy.

Fair values of peso-denominated government debt securities issued by the Philippine government, are determined based on the reference price per Bloomberg which used BVAL. These BVAL reference rates are computed based on the weighted price derived using an approach based on a combined sequence of proprietary BVAL algorithms of direct observations or observed comparables.

Fair values of actively traded corporate debt securities are determined based on their market prices quoted in the PDS or based on the direct reference price per Bloomberg at the end of each reporting period; hence, categorized within Level 1.

(b) *Equity Securities*

The fair values of certain equity securities classified as financial assets at FVTPL and at FVOCI as of December 31, 2019 and 2018 were valued based on their market prices quoted in the PSE at the end of each reporting period; hence, categorized within Level 1.

Level 2 category includes the Group's investments in proprietary club shares as their prices are not derived from a market considered as active due to lack of trading activities among market participants at the end of each reporting period.

For equity securities which are not traded in an active market and with fair value categorized within Level 3, their fair value is determined through valuation techniques such as market-based approach (price-to-book value method) using current market values of comparable listed entities, discounted cash flow method, net asset value method, or dividend discounted model.

The price-to-book value method used to value a certain equity security of the Parent Company uses the price-to-book ratio of comparable listed entities as multiple in determining the fair value adjusted by a certain valuation discount. The price-to-book ratio used in the fair value measurement as of December 31, 2019 and 2018 ranges from 0.470:1 to 1.51:1 and from 0.620:1 to 2.110:1, respectively. Increase or decrease in the price-to-book ratio and net asset value would result in higher or lower fair values, all else equal.

In 2018, for a certain preferred equity security, the Group has used the discounted cash flow method applying a discount rate of 6.28% to determine the present value of future cash flows from dividends or redemption expected to be received from the instrument.

A reconciliation of the carrying amounts of Level 3 equity securities at the beginning and end of 2019 and 2018 is shown below.

	<b>Group</b>		
	<b>Financial Assets at FVOCI</b>	<b>Financial Assets at FVTPL</b>	<b>Total</b>
<b>2019:</b>			
Balance at beginning of year	P 3,989	P -	P 3,989
Disposals	( 2,000)	-	( 2,000)
Fair value losses w- net	( 376)	-	( 376)
Balance at end of year	<b><u>P 1,613</u></b>	<b><u>P -</u></b>	<b><u>P 1,613</u></b>
<b>2018:</b>			
Balance at beginning of year	P 1,710	P 543	P 2,253
Additions	2,000	-	2,000
Reclassification	543	( 543)	-
Fair value losses - net	( 264)	-	( 264)
Balance at end of year	<b><u>P 3,989</u></b>	<b><u>P -</u></b>	<b><u>P 3,989</u></b>
	<b>Parent Company</b>		
	<b>Financial Assets at FVOCI</b>	<b>Financial Assets at FVTPL</b>	<b>Total</b>
<b>2019:</b>			
Balance at beginning of year	P 1,946	P -	P 1,946
Fair value losses - net	( 365)	-	( 365)
Balance at end of year	<b><u>P 1,581</u></b>	<b><u>P -</u></b>	<b><u>P 1,581</u></b>
<b>2018 (As restated):</b>			
Balance at beginning of year	P 1,481	P 543	P 2,024
Reclassifications	543	( 543)	-
Fair value losses - net	( 78)	-	( 78)
Balance at end of year	<b><u>P 1,946</u></b>	<b><u>P -</u></b>	<b><u>P 1,946</u></b>

There were neither transfers between the levels of the fair value hierarchy nor gains or losses recognized in the statements of profit or loss for Level 3 financial assets in 2019 and 2018.

(c) *Derivative Assets and Liabilities*

The fair value of the Group's derivative assets categorized within Level 1 is determined by the current mid-price based on the last trading transaction as defined by third-party market makers.

On the other hand, the fair values of certain derivative financial assets and liabilities categorized within Level 2 were determined through valuation techniques using net present value computation which makes use of the streams of cash flows related to the derivative financial instruments such as interest rate swaps and currency swaps.



### 7.3 Financial Instruments Measured at Amortized Cost for Which Fair Value is Disclosed

The table below summarizes the fair value hierarchy of the Group and Parent Company's financial assets and financial liabilities which are not measured at fair value in the statements of financial position but for which fair value is disclosed.

	Group			
	Level 1	Level 2	Level 3	Total
<b>2019:</b>				
<b>Financial Assets:</b>				
Cash and other cash items	P 16,907	P -	P -	P 16,907
Due from BSP	87,255	-	-	87,255
Due from other banks	18,818	-	-	18,818
Loans arising from reverse repurchase agreements	5,768	-	-	5,768
Interbank loans	18,803	-	-	18,803
Investment securities at amortized cost	101,455	-	-	101,455
Loans and receivables - net	-	-	449,822	449,822
Other resources	-	-	898	898
	<b>P 249,006</b>	<b>P -</b>	<b>P 450,720</b>	<b>P 699,726</b>
<b>Financial Liabilities:</b>				
Deposit liabilities	P -	P -	P 458,303	P 458,303
Bills payable	-	-	101,606	101,606
Bonds payable	-	84,925	-	84,925
Accrued interest and other expenses	-	-	6,019	6,019
Other liabilities	-	-	17,351	17,351
	<b>P -</b>	<b>P 84,925</b>	<b>P 583,279</b>	<b>P 668,204</b>
<b>2018:</b>				
<b>Financial Assets:</b>				
Cash and other cash items	P 17,392	P -	P -	P 17,392
Due from BSP	56,495	-	-	56,495
Due from other banks	20,342	-	-	20,342
Loans arising from reverse repurchase agreements	10,032	-	-	10,032
Interbank loans	9,522	-	-	9,522
Investment securities at amortized cost	86,876	-	-	86,876
Loans and receivables - net	-	-	401,745	401,745
Other resources	-	-	985	985
	<b>P 200,659</b>	<b>P -</b>	<b>P 402,730</b>	<b>P 603,389</b>
<b>Financial Liabilities:</b>				
Deposit liabilities	P -	P -	P 424,437	P 424,437
Bills payable	-	-	56,001	56,001
Bonds payable	-	55,281	-	55,281
Subordinated debt	-	9,955	-	9,955
Accrued interest and other expenses	-	-	4,984	4,984
Other liabilities	-	-	11,944	11,944
	<b>P -</b>	<b>P 65,236</b>	<b>P 497,366</b>	<b>P 562,602</b>

	Parent Company			
	Level 1	Level 2	Level 3	Total
<b>2019:</b>				
<b>Financial Assets:</b>				
Cash and other cash items	P 16,808	P -	P -	P 16,808
Due from BSP	85,453	-	-	85,453
Due from other banks	18,468	-	-	18,468
Loans arising from reverse repurchase agreements	5,629	-	-	5,629
Interbank loans	19,411	-	-	19,411
Investment securities at amortized cost	100,682	-	-	100,682
Loans and receivables - net	-	-	442,088	442,088
Other resources	-	-	896	896
	<b>P 246,451</b>	<b>P -</b>	<b>P 442,984</b>	<b>P 689,435</b>
<b>Financial Liabilities:</b>				
Deposit liabilities	P -	P -	P 456,593	P 456,593
Bills payable	-	-	93,938	93,938
Bonds payable	-	84,925	-	84,925
Accrued interest and other expenses	-	-	5,758	5,758
Other liabilities	-	-	16,553	16,553
	<b>P -</b>	<b>P 84,925</b>	<b>P 572,842</b>	<b>P 657,767</b>
<b>2018 (As restated):</b>				
<b>Financial Assets:</b>				
Cash and other cash items	P 17,321	P -	P -	P 17,321
Due from BSP	55,059	-	-	55,059
Due from other banks	19,815	-	-	19,815
Loans arising from reverse repurchase agreements	10,000	-	-	10,000
Interbank loans	9,592	-	-	9,592
Investment securities at amortized cost	85,514	-	-	85,514
Loans and receivables - net	-	-	394,069	394,069
Other resources	-	-	982	982
	<b>P 200,418</b>	<b>P -</b>	<b>P 395,051</b>	<b>P 592,352</b>
<b>Financial Liabilities:</b>				
Deposit liabilities	P -	P -	P 426,169	P 426,169
Bills payable	-	-	48,759	48,759
Bonds payable	-	55,281	-	55,281
Subordinated debt	-	9,955	-	9,955
Accrued interest and other expenses	-	-	4,834	4,834
Other liabilities	-	-	11,013	11,013
	<b>P -</b>	<b>P 65,236</b>	<b>P 490,775</b>	<b>P 556,011</b>

The following are the methods used to determine the fair value of financial assets and financial liabilities not presented in the statements of financial position at their fair values:

(a) *Due from BSP and Other Banks, and Loans and Receivables Arising from Reverse Repurchase Agreements*

Due from BSP pertains to deposits made to the BSP for clearing and reserve requirements, overnight and term deposit facilities, while loans and receivables arising from reverse repurchase agreements pertain to loans and receivables from BSP arising from overnight lending from excess liquidity. Due from other banks includes items in the course of collection. The fair value of floating rate placements and overnight deposits is their carrying amount. The estimated fair value of fixed interest-bearing deposits is based on the discounted cash flows using prevailing money market interest rates for debt with similar credit risk and remaining maturity, which for short-term deposits approximate the nominal value.

(b) *Investment Securities at Amortized Cost*

The fair value of investment securities at amortized cost consisting of government securities and corporate debt securities is determined based on reference prices appearing in Bloomberg.

(c) *Deposits Liabilities and Borrowings*

The estimated fair value of demand deposits with no stated maturity, which includes non-interest-bearing deposits, is the amount repayable on demand. The estimated fair value of long-term fixed interest-bearing deposits and other borrowings without quoted market price is based on discounted cash flows using interest rates for new debts with similar remaining maturity. The Level 2 fair value of bonds payable and subordinated debt is determined based on the average of ask and bid prices as appearing on Bloomberg. For bills payable categorized within Level 3, fair value is determined based on their discounted amount of estimated future cash flows expected to be received or paid, or based on their cost which management estimates to approximate their fair values.

(d) *Other Resources and Other Liabilities*

Due to their short duration, the carrying amounts of other resources and liabilities in the statements of financial position are considered to be reasonable approximation of their fair values.

#### 7.4 Fair Value Disclosures for Investment Properties Carried at Cost

The total estimated fair values of the investment properties amounted to P10,045, P7,624 and P8,415 in the Group's financial statements and P9,595, P7,284 and P8,062 in the Parent Company's financial statements as of December 31, 2019, 2018 and 2017, respectively (see Note 14.3). The fair value hierarchy of these properties as of December 31, 2019 and 2018 is categorized as Level 3.

The fair values of the Group and Parent Company's investment properties were determined based on the following approaches:

(a) *Fair Value Measurement for Land*

The Level 2 fair value of land was derived using the market comparable approach that reflects the recent transaction prices for similar properties in nearby locations as determined by an independent appraiser. Under this approach, when sales prices and/or actual sales transaction of comparable land in close proximity are used in the valuation of the subject property with no adjustment on the price, fair value is included in Level 2.

On the other hand, if the observable and recent prices of the reference properties were adjusted for differences in key attributes such as property size, location and zoning, and accessibility, or any physical or legal restrictions on the use of the property, the fair value will be categorized as Level 3. The most significant input into this valuation approach is the price per square feet, hence, the higher the price per square feet, the higher the fair value.

(b) *Fair Value Measurement for Buildings*

The Level 3 fair value of the buildings was determined using the cost approach that reflects the cost to a market participant to construct an asset of comparable usage, construction standards, design and layout, adjusted for obsolescence. The more significant inputs used in the valuation include direct and indirect costs of construction such as but not limited to, labor and contractor's profit, materials and equipment, surveying and permit costs, electricity and utility costs, architectural and engineering fees, insurance and legal fees.

These inputs were derived from various suppliers and contractor's quotes, price catalogues, and construction price indices. Under this approach, higher estimated costs used in the valuation will result in higher fair value of the properties.

There has been no change in the valuation techniques for investment properties in both years.

## 8. SEGMENT INFORMATION

### 8.1 Business Segments

The Group's operating businesses are managed separately according to the nature of services provided (primary segments) and the different geographical markets served (secondary segments) with a segment representing a strategic business unit. The Group's business segments follow:

- (a) *Retail* – principally handles the business centers offering a wide range of consumer banking products and services. Products offered include individual customer's deposits, credit cards, home and mortgage loans, auto, personal and microfinance loans, overdraft facilities, payment remittances and foreign exchange transactions. It also upsells bank products [unit investment trust funds (UITFs), etc.] and cross-sells bancassurance products. The segment includes the net assets of the servicing entity, RBSC, and portfolios of Rizal Microbank, Inc.
- (b) *Corporate* – principally handles distinct customer segments: (i) conglomerates; (ii) large corporations; (iii) emerging corporates, which focus on large middle accounts often referred to as the "Next 500 Corporations"; (iv) Japanese multinationals with a strong presence in the country; (v) Filipino-Chinese businesses; and, (vi) Korean businesses. This segment includes portfolio of RLFC.
- (c) *Small and Medium Enterprises (SME)* – principally handles the financial needs of the country's small businesses or the SMEs and the Commercial Middle Market segments. The SME Banking Group provides a holistic approach serving both the financial (e.g. loans, deposits, investments, insurance, etc.) and non-financial needs (e.g. networking, financial literacy trainings, etc.) of client to help them grow their business. Clients are the entrepreneurs located in different parts of the country and spread in various industry sectors such as manufacturing, wholesale & retail trade, construction, hotels, agriculture, and healthcare, among others.

- (d) *Treasury* – principally provides money market, trading and treasury services, as well as the management of the Group’s funding operations by use of treasury bills, government securities and placements and acceptances with other banks, through treasury and wholesale banking.
- (e) *Others* – consists of other subsidiaries except for RSBC and Rizal Microbank, Inc., which is presented as part of Retail, and RLFC which is presented under Corporate.

These segments are the basis on which the Group reports its primary segment information. Other operations of the Group comprise the operations and financial control groups. Transactions between segments are conducted at estimated market rates on an arm’s length basis.

Segment revenues and expenses that are directly attributable to primary business segment and the relevant portions of the Group’s revenues and expenses that can be allocated to that business segment are accordingly reflected as revenues and expenses of that business segment.

For secondary segments, revenues and expenses are attributed to geographic areas based on the location of the resources producing the revenues, and in which location the expenses are incurred.

There were no changes in the Group’s operating segments in 2019 and 2018.

### 8.2 Analysis of Primary Segment Information

Primary segment information (by business segment) on a consolidated basis as of and for the years ended December 31, 2019, 2018 and 2017 follow:

	<u>Retail</u>	<u>Corporate</u>	<u>SME</u>	<u>Treasury</u>	<u>Others</u>	<u>Total</u>
<b>2019:</b>						
<b>Revenues</b>						
From external customers						
Interest income	P 37,465	P 20,012	P 4,608	P 6,978	P 103	P 69,166
Interest expense	(17,303)	(13,879)	(3,648)	(6,164)	(42)	(41,036)
Net interest income	20,162	6,133	960	814	61	28,130
Non-interest income	4,928	2,266	171	8,207	1,163	16,735
	<u>25,090</u>	<u>8,399</u>	<u>1,131</u>	<u>9,021</u>	<u>1,224</u>	<u>44,865</u>
Intersegment revenues						
Interest income	-	3,463	1,940	-	8	5,411
Non-interest income	591	-	-	-	-	591
	<u>591</u>	<u>3,463</u>	<u>1,940</u>	<u>-</u>	<u>8</u>	<u>6,002</u>
Total net revenues	<u>25,681</u>	<u>11,862</u>	<u>3,071</u>	<u>9,021</u>	<u>1,232</u>	<u>50,867</u>
<b>Expenses</b>						
Operating expenses excluding depreciation and amortization	15,910	5,412	1,129	1,109	285	23,845
Depreciation and amortization	418	381	7	14	14	834
	<u>16,328</u>	<u>5,793</u>	<u>1,136</u>	<u>1,123</u>	<u>299</u>	<u>24,679</u>
Profit before tax	9,353	6,069	1,935	7,898	933	26,188
Tax income	-	-	-	-	(1,275)	(1,275)
Net profit or loss	<u>P 9,353</u>	<u>P 6,069</u>	<u>P 1,935</u>	<u>P 7,898</u>	<u>(P 342)</u>	<u>P 24,913</u>
Total resources	<u>P 760,419</u>	<u>P 228,346</u>	<u>P 52,419</u>	<u>P 109,199</u>	<u>P 5,467</u>	<u>P 1,115,850</u>
Total liabilities	<u>P 677,077</u>	<u>P 80,654</u>	<u>P 43,722</u>	<u>P 14,703</u>	<u>P 1,287</u>	<u>P 817,443</u>

	<u>Retail</u>	<u>Corporate</u>	<u>SME</u>	<u>Treasury</u>	<u>Others</u>	<u>Total</u>
<b>2018:</b>						
<b>Revenues</b>						
From external customers						
Interest income	P 24,744	P 15,967	P 2,786	P 4,711	P 127	P 48,335
Interest expense	(7,788)	(11,419)	(2,383)	(3,178)	(12)	(24,780)
Net interest income	16,956	4,548	403	1,533	115	23,555
Non-interest income	4,249	2,455	170	1,228	837	8,939
	<u>21,205</u>	<u>7,003</u>	<u>573</u>	<u>2,761</u>	<u>952</u>	<u>32,494</u>
Intersegment revenues						
Interest income	-	3,165	955	-	6	4,126
Non-interest income	531	-	-	-	-	531
	<u>531</u>	<u>3,165</u>	<u>955</u>	<u>-</u>	<u>6</u>	<u>4,657</u>
Total net revenues	<u>21,736</u>	<u>10,168</u>	<u>1,528</u>	<u>2,761</u>	<u>958</u>	<u>37,151</u>
<b>Expenses</b>						
Operating expenses excluding depreciation and amortization	13,467	2,326	460	625	280	17,158
Depreciation and amortization	762	416	7	14	4	1,203
	<u>14,229</u>	<u>2,742</u>	<u>467</u>	<u>639</u>	<u>284</u>	<u>18,361</u>
Profit before tax	7,507	7,426	1,061	2,122	674	18,790
Tax income	-	-	-	-	(872)	(872)
Net profit or loss	<u>P 7,507</u>	<u>P 7,426</u>	<u>P 1,061</u>	<u>P 2,122</u>	<u>(P 198)</u>	<u>P 17,918</u>
Total resources	<u>P 149,800</u>	<u>P 229,525</u>	<u>P 42,635</u>	<u>P 109,199</u>	<u>P 5,957</u>	<u>P 537,116</u>
Total liabilities	<u>P 418,787</u>	<u>P 113,195</u>	<u>P 34,514</u>	<u>P 14,703</u>	<u>P 1,685</u>	<u>P 582,884</u>
<b>2017:</b>						
<b>Revenues</b>						
From external customers						
Interest income	P 19,692	P 13,579	P 1,583	P 3,398	P 501	P 38,753
Interest expense	(4,262)	(8,154)	(1,309)	(2,161)	(256)	(16,142)
Net interest income	15,430	5,425	274	1,237	245	22,611
Non-interest income	3,962	2,548	111	1,738	1,125	9,484
	<u>19,392</u>	<u>7,973</u>	<u>385</u>	<u>2,975</u>	<u>1,370</u>	<u>32,095</u>
Intersegment revenues						
Interest income	-	2,043	849	-	6	2,898
Non-interest income	499	-	-	-	499	998
	<u>499</u>	<u>2,043</u>	<u>849</u>	<u>-</u>	<u>505</u>	<u>3,896</u>
Total net revenues	<u>19,891</u>	<u>10,016</u>	<u>1,234</u>	<u>2,975</u>	<u>1,875</u>	<u>35,991</u>
<b>Expenses</b>						
Operating expenses excluding depreciation and amortization	12,232	1,941	353	551	986	16,063
Depreciation and amortization	828	425	7	13	341	1,614
	<u>13,060</u>	<u>2,366</u>	<u>360</u>	<u>564</u>	<u>1,327</u>	<u>17,677</u>
Profit before tax	6,831	7,650	874	2,411	548	18,314
Tax income	-	-	-	-	(841)	(841)
Net profit or loss	<u>P 6,831</u>	<u>P 7,650</u>	<u>P 874</u>	<u>P 2,411</u>	<u>(P 293)</u>	<u>P 17,473</u>
Total resources	<u>P 136,979</u>	<u>P 233,209</u>	<u>P 33,309</u>	<u>P 83,728</u>	<u>P 14,828</u>	<u>P 502,053</u>
Total liabilities	<u>P 402,961</u>	<u>P 164,107</u>	<u>P 26,784</u>	<u>P 20,692</u>	<u>P 9,261</u>	<u>P 623,805</u>

### 8.3 Reconciliation

Presented below is a reconciliation of the Group's segment information to the key financial information presented in its consolidated financial statements.

	2019	2018	2017
<b>Revenue</b>			
Total segment revenues	P 50,867	P 37,151	P 35,991
Elimination of intersegment revenues	( 15,010 )	( 10,656 )	( 10,872 )
Net revenues as reported in profit or loss	<u>P 35,857</u>	<u>P 26,495</u>	<u>P 25,119</u>
<b>Profit or loss</b>			
Total segment operating income	P 26,188	P 18,790	P 18,314
Elimination of intersegment profit	( 20,799 )	( 14,469 )	( 14,004 )
Group net profit as reported in profit or loss	<u>P 5,389</u>	<u>P 4,321</u>	<u>P 4,310</u>
<b>Resources</b>			
Total segment resources	P 1,155,850	P 537,116	P 502,053
Elimination of intersegment assets	( 388,771 )	107,479	51,821
Total resources	<u>P 767,079</u>	<u>P 644,595</u>	<u>P 553,874</u>
<b>Liabilities</b>			
Total segment liabilities	P 817,443	P 582,884	P 623,805
Elimination of intersegment liabilities	( 133,214 )	( 19,459 )	( 136,844 )
Total liabilities	<u>P 684,229</u>	<u>P 563,425</u>	<u>P 486,961</u>

### 8.4 Analysis of Secondary Segment Information

Secondary information (by geographical locations) as of and for the years ended December 31, 2019, 2018 and 2017 follow:

	Philippines	Asia and Europe	Total
<b>2019:</b>			
<b>Statement of profit or loss</b>			
Total income	P 51,068	P -	P 51,068
Total expenses	45,666	14	45,680
Net profit (loss)	<u>P 5,402</u>	<u>(P 14)</u>	<u>P 5,388</u>
<b>Statement of financial position</b>			
Total resources	<u>P 767,050</u>	<u>P 29</u>	<u>P 767,079</u>
Total liabilities	<u>P 684,155</u>	<u>P 74</u>	<u>P 684,229</u>
<b>Other segment information</b>			
Depreciation and amortization	<u>P 2,503</u>	<u>P -</u>	<u>P 2,503</u>

2018:

Statement of profit or loss

	Philippines	Asia and Europe	Total
Total income	P 36,930	P 9	P 36,939
Total expenses	32,580	38	32,618
Net profit (loss)	<u>P 4,350</u>	<u>(P 29)</u>	<u>P 4,321</u>

Statement of financial position

	Philippines	Asia and Europe	Total
Total resources	P 644,451	P 144	P 644,595
Total liabilities	P 563,355	P 70	P 563,425

Other segment information

	Philippines	Asia and Europe	Total
Depreciation and amortization	P 1,821	P -	P 1,821

2017:

Statement of profit or loss

	Philippines	United States	Asia and Europe	Total
Total income	P 32,212	P -	P 6	P 32,218
Total expenses	27,877	-	31	27,908
Net profit (loss)	<u>P 4,335</u>	<u>P -</u>	<u>(P 25)</u>	<u>P 4,310</u>

Statement of financial position

	Philippines	United States	Asia and Europe	Total
Total resources	P 553,731	P 1	P 143	P 553,875
Total liabilities	P 486,889	P 1	P 71	P 486,961

Other segment information –  
Depreciation and amortization

	Philippines	United States	Asia and Europe	Total
Depreciation and amortization	P 1,914	P -	P -	P 1,914

## 9. CASH AND CASH EQUIVALENTS

The components of Cash and Cash Equivalents follow:

	Group		Parent Company	
	2019	2018	2019	2018
Cash and other cash items	P 16,907	P 17,392	P 16,808	P 17,321
Due from BSP	87,255	56,495	85,453	55,059
Due from other banks	18,818	20,342	18,468	19,815
Loans arising from reverse repurchase agreements	5,768	10,032	5,629	10,000
Interbank loans receivables (see Note 11)	18,803	9,522	19,411	9,592
	<u>P 147,551</u>	<u>P 113,783</u>	<u>P 145,769</u>	<u>P 111,787</u>

Cash consists primarily of funds in the form of Philippine currency notes and coins, and includes foreign currencies acceptable to form part of the international reserves in the Group's vault and those in the possession of tellers, including ATMs. Other cash items include cash items other than currency and coins on hand, such as checks drawn on other banks or other branches after the clearing cut-off time until the close of the regular banking hours.

Due from BSP represents the aggregate balance of deposit accounts maintained with the BSP primarily to meet reserve requirements (see Note 17), to serve as clearing account for interbank claims and to comply with existing trust regulations.

Loans arising from repurchase agreements, which normally mature within 30 days, represents overnight placements with private entities where the underlying securities cannot be sold or repledged to parties other than the contracting party.

Due from BSP includes:

	Group		Parent Company	
	2019	2018	2019	2018
Demand deposit and secured settlement accounts	P 53,337	P 51,495	P 52,353	P 50,059
Term deposit	32,643	5,000	32,000	5,000
Overnight deposit	1,275	-	1,100	-
	<b>P 87,255</b>	<b>P 56,495</b>	<b>P 85,453</b>	<b>P 55,059</b>

The balance of Due from other banks account represents regular deposits with the following:

	Group		Parent Company	
	2019	2018	2019	2018
Foreign banks	P 18,192	P 18,843	P 17,919	P 18,861
Local banks	626	1,499	549	954
	<b>P 18,818</b>	<b>P 20,342</b>	<b>P 18,468</b>	<b>P 19,815</b>

Interest on placements with BSP and other banks, which is presented as part of Interest Income on Others in the statements of profit or loss, consist of:

	Group		
	2019	2018	2017
BSP	P 269	P 324	P 334
Other banks	165	169	44
	<b>P 434</b>	<b>P 493</b>	<b>P 378</b>

	Parent Company		
	2019	2018	2017
BSP	P 262	P 324	P 333
Other banks	153	95	35
	<b>P 415</b>	<b>P 419</b>	<b>P 368</b>

Interests on Loans arising from reverse repurchase agreements and Interbank loan receivables are presented as part of Interest on Loans and receivables (see Note 11).

The Group's deposits in other banks and in BSP arising from overnight lending from excess liquidity earn annual interest as follows:

	2019	2018	2017
BSP	3.50% - 4.50%	3.00% - 4.50%	3.50%
Other banks	0.00% - 2.50%	0.00% - 2.50%	0.00% - 1.20%

## 10. TRADING AND INVESTMENT SECURITIES

This account is comprised of:

	Group		Parent Company	
	2019	2018	2019	2018
Financial assets at FVTPL	P 5,548	P 7,570	P 4,800	P 6,693
Financial assets at FVOCI	54,245	21,987	52,425	18,815
Investment securities at amortized cost	100,926	88,892	100,219	88,641
	<b>P 160,719</b>	<b>P 118,449</b>	<b>P 157,444</b>	<b>P 114,149</b>

### 10.1 Financial Assets at Fair Value Through Profit or Loss

Financial assets at FVTPL is composed of the following:

	Group		Parent Company	
	2019	2018	2019	2018
Government securities	P 3,438	P 3,511	P 3,438	P 3,419
Corporate debt securities	287	1,657	287	1,547
Equity securities	748	675	-	-
Derivative financial assets	1,075	1,727	1,075	1,727
	<b>P 5,548</b>	<b>P 7,570</b>	<b>P 4,800</b>	<b>P 6,693</b>



The carrying amounts of financial assets at FVTPL are classified as follows:

	<u>Group</u>		<u>Parent Company</u>	
	<u>2019</u>	<u>2018</u>	<u>2019</u>	<u>2018</u>
				(As restated – see Note 34)
Held-for-trading	P 3,725	P 5,168	P 3,725	P 4,966
Designated as at FVTPL	748	675	-	-
Derivative financial assets	<u>1,075</u>	<u>1,727</u>	<u>1,075</u>	<u>1,727</u>
	<u>P 5,548</u>	<u>P 7,570</u>	<u>P 4,800</u>	<u>P 6,693</u>

Equity securities are composed of listed shares of stock traded at the PSE and shares of stock designated as at FVTPL. Dividend income earned by the Group on these equity securities amounted to P10, P14 and P12 in 2019, 2018 and 2017, respectively, which are included as part of Miscellaneous income under the Other Operating Income account in the statements of profit or loss (see Note 25.1)

Treasury bills and other debt securities issued by the government and other private corporations earn annual interest as follows:

	<u>2019</u>	<u>2018</u>	<u>2017</u>
Peso denominated	3.25.00% - 15.00%	3.25% - 8.13%	2.13% - 8.75%
Foreign currency denominated	2.05.00% - 10.63%	2.05% - 11.63%	2.95% - 10.63%

Derivative instruments used by the Group include foreign currency short-term forwards, cross-currency swaps, debt warrants and options. Foreign currency forwards represent commitments to purchase/sell on a future date at a specific exchange rate. Foreign currency short-term swaps are simultaneous foreign currency spot and forward deals with tenor of one year.

Debt warrants attached to the bonds and other debt securities allows the Group to purchase additional debt securities from the same contracting issuer at the same price and yield as the initial purchased security. Option is a derivative financial instrument that specifies a contract between two parties for a future transaction on an asset at a reference price.

The aggregate contractual or notional amount of derivative financial instruments and the aggregative fair values of derivative financial assets and financial liabilities as of December 31 both in the Group and Parent Company's financial statements are shown below.

	<u>Notional Amount</u>	<u>Fair Values</u>	
		<u>Assets</u>	<u>Liabilities</u>
<b>2019:</b>			
Currency swaps and forwards	P 63,411	P 680	P 601
Interest rate swaps and futures	29,720	369	257
Debt warrants	5,326	16	-
Options	1,427	6	-
Credit default swap	<u>253</u>	<u>4</u>	<u>5</u>
	<u>P 100,137</u>	<u>P 1,075</u>	<u>P 863</u>

	<u>Notional Amount</u>	<u>Fair Values</u>	
		<u>Assets</u>	<u>Liabilities</u>
<b>2018:</b>			
Currency swaps and forwards	P 67,420	P 1,377	P 567
Interest rate swaps and futures	35,378	309	305
Debt warrants	5,531	18	-
Options	1,240	3	22
Credit default swap	<u>946</u>	<u>20</u>	<u>-</u>
	<u>P 110,515</u>	<u>P 1,727</u>	<u>P 894</u>

Derivative liabilities are shown as Derivative financial liabilities as part of Other Liabilities account in the statements of financial position (see Note 22). The significant portion of such derivative liabilities have maturity periods of less than a year.

Other information about the fair value measurement of the Group and Parent Company's financial assets at FVTPL are presented in Note 7.2.

## 10.2 Financial Assets at Fair Value Through Other Comprehensive Income

Financial assets at FVOCI as of December 31 consist of:

	<u>Group</u>		<u>Parent Company</u>	
	<u>2019</u>	<u>2018</u>	<u>2019</u>	<u>2018</u>
				(As restated – see Note 34)
Quoted equity securities	P 2,021	P 2,472	P 1,260	P 1,731
Unquoted equity securities	1,612	3,989	1,581	1,946
Government debt securities	43,281	15,138	43,281	15,138
Corporate debt securities	<u>7,331</u>	<u>388</u>	<u>6,303</u>	<u>-</u>
	<u>P 54,245</u>	<u>P 21,987</u>	<u>P 52,425</u>	<u>P 18,815</u>

The Group made an irrevocable designation for the above local equity securities as at FVOCI because they are held for long-term investments and are neither held-for-trading nor designated as at FVTPL. Unquoted equity securities include golf club shares and investments in non-marketable equity securities of private companies.

Included in the carrying amount of the Group's financial assets at FVOCI as of December 31, 2019 and 2018 are unquoted equity securities with fair value of P1,612 and P3,989, respectively, determined using the net asset value method, dividend discounted model, discounted cash flow method, or a market-based approach (price-to-book value method), hence, categorized under Level 3 of the fair value hierarchy (see Note 7.2). These unquoted equity securities include investments of the Parent Company with fair value of P1,581 and P1,946 as of December 31, 2019, and 2018, respectively.

As a result of the Group's disposal of certain equity securities classified as at FVOCI, the related fair value loss recognized in other comprehensive income under Revaluation Reserves account amounting to P41 were transferred to Surplus account (see Note 23.5). There were no disposal of equity securities classified as at FVOCI in 2018.

In 2019, 2018 and 2017, dividends on these equity securities were recognized amounting to P294, P175 and P222 by the Group and, P95, P187 and P196 by the Parent Company, respectively, which are included as part of Miscellaneous income under the Other Operating Income account in the statements of profit or loss (see Note 25.1).

### 10.3 Investment Securities at Amortized Cost

Investment securities at amortized cost as of December 31 consist of:

	Group		Parent Company	
	2019	2018	2019	2018 (As restated – see Note 34)
Government securities	P 92,211	P 66,084	P 92,211	P 66,084
Corporate debt securities	8,854	22,943	8,057	22,602
	<u>101,065</u>	<u>89,027</u>	<u>100,268</u>	<u>88,686</u>
Allowance for impairment	(139)	(135)	(49)	(45)
	<u>P 100,926</u>	<u>P 88,892</u>	<u>P 100,219</u>	<u>P 88,641</u>

Interest rates per annum on government securities and corporate debt securities range from the following:

	2019	2018	2017
Peso denominated securities	3.63% - 8.60%	3.63%-8.00%	2.13% - 8.60%
Foreign currency-denominated securities	1.63% - 10.63%	1.63%-10.63%	1.63%-10.63%

In 2019, the Parent Company disposed of certain government and corporate debt securities denominated in peso and US dollar under its HTC portfolio with aggregate carrying amount of P101,208 resulting in net gains amounting to P3,693. The disposals was in line with the Parent Company's objective to improve its qualifying capital in augmenting its capital adequacy ratio requirements. Meanwhile, a certain US dollar-denominated corporate bond with a carrying amount of P217 was disposed in September 2019 in response to increased credit risk resulting to a loss of P8.

In December 2018, the Parent Company disposed of certain US dollar-denominated bonds under its HTC portfolio with aggregate carrying amount of P3,113, resulting in net gains amounting to P69. The disposal was made in order to maintain adequate liquidity buffer for the expected cash outflows for loan drawdowns. Management had assessed that the disposals of the investment securities under the HTC portfolio during those periods are consistent with the Group's HTC business model with the objective of collecting contractual cash flows and have qualified under the permitted sale events set forth in the Group's business model in managing financial assets manual and the requirements of PFRS 9.

The above disposals of investment securities were approved by the Executive Committee of the Parent Company in compliance with the documentation requirements of the BSP.

The Group and the Parent Company recognized ECL on investment securities at amortized cost amounting to P4 in 2019 and P24 and P15, respectively, in 2018 (see Note 16).

Certain government securities are deposited with the BSP as security for the Group's faithful compliance with its fiduciary obligations in connection with its trust operations (see Note 27).

As of December 31, 2019 and 2018, certain investment securities of both the Group and Parent Company were pledged as collateral for bills payable under repurchase agreements (see Note 18).

### 10.4 Interest Income from Trading and Investment Securities

Interest income from trading and investment securities recognized by the Group and Parent Company in 2019, 2018 and 2017 are shown below.

	Group		
	2019	2018	2017
Debt securities at FVTPL	P 368	P 441	P 293
Debt securities at FVOCI	1,418	136	-
Debt securities at amortized cost	<u>2,712</u>	<u>2,826</u>	<u>2,137</u>
	<u>P 4,498</u>	<u>P 3,403</u>	<u>P 2,430</u>
	Parent		
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Financial assets at FVTPL	P 358	P 338	P 203
Debt securities at FVOCI	1,397	206	352
Investment securities at amortized cost	<u>2,684</u>	<u>2,823</u>	<u>2,217</u>
	<u>P 4,439</u>	<u>P 3,367</u>	<u>P 2,772</u>

### 10.5 Trading and Securities Gains (Losses)

The Group and the Parent Company recognized trading and securities gains (losses) in its trading or disposals of investment securities, including their fair value changes, in 2019, 2018, and 2017 as follows:

	Group		
	2019	2018	2017
<b>Profit or loss:</b>			
Financial assets at FVTPL	P 611	(P 117)	P 195
Debt securities at FVOCI	3,196	48	-
Investment securities at amortized cost	<u>3,685</u>	<u>69</u>	<u>705</u>
	<u>P 7,492</u>	<u>P -</u>	<u>P 900</u>
<b>Other comprehensive income (loss):</b>			
Equity securities at FVOCI	(P 586)	(P 1,018)	(P 156)
Debt securities at FVOCI	(116)	149	-
	<u>(P 702)</u>	<u>(P 869)</u>	<u>(P 156)</u>
	Parent		
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
<b>Profit or loss:</b>			
Financial assets at FVTPL	P 581	(P 137)	(P 19)
Debt securities at FVOCI	3,166	48	-
Investment securities at amortized cost	<u>3,685</u>	<u>68</u>	<u>687</u>
	<u>P 7,432</u>	<u>(P 21)</u>	<u>P 668</u>

	Parent		
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
<b>Other comprehensive income (loss):</b>			
Equity securities at FVOCI	(P 837)	(P 628)	(P 269)
Debt securities at FVOCI	( 116)	149	-
	<u>(P 953)</u>	<u>(P 479)</u>	<u>(P 269)</u>

## 11. LOANS AND RECEIVABLES

	Group		Parent Company	
	2019	2018	2019	2018 (As restated – see Note 34)
Receivables from customers:				
Loans and discounts	P 377,947	P 340,011	P 373,480	P 337,065
Credit card receivables	31,043	21,550	31,043	21,550
Customers' liabilities on acceptances, import bills and trust receipts	16,869	21,075	16,869	21,073
Bills purchased	4,815	3,112	4,771	3,112
Lease contract receivables	3,767	3,403	-	-
Receivables financed	678	587	-	-
	<u>435,119</u>	<u>389,738</u>	<u>426,163</u>	<u>382,800</u>
Unearned discount	( 856)	( 665)	( 161)	( 163)
	<u>434,263</u>	<u>389,073</u>	<u>426,002</u>	<u>382,637</u>
Other receivables:				
Interbank loans receivables (see Note 9)	18,803	9,522	19,411	9,592
Accrued interest receivables	4,332	4,498	4,318	4,472
Accounts receivables [see Notes 15.3 and 28.5(a) and (b)]	2,786	2,452	2,821	2,279
UDSCL	1,475	1,963	1,475	1,963
Sales contract receivables	990	1,083	792	906
	<u>28,386</u>	<u>19,518</u>	<u>28,817</u>	<u>19,212</u>
	<u>462,649</u>	<u>408,591</u>	<u>454,819</u>	<u>401,849</u>
Allowance for impairment (see Notes 4.4.8 and 16)	( 13,430)	( 10,291)	( 12,726)	( 9,689)
	<u>P 449,219</u>	<u>P 398,300</u>	<u>P 442,093</u>	<u>P 392,160</u>

Receivables from customers' portfolio earn average annual interest or range of interest as follows:

	2019	2018	2017
Loans and discounts:			
Philippine peso	8.69%	5.79%	5.00%
Foreign currencies	4.96%	4.53%	3.63%
Credit card receivables	23.58% - 24.86%	16.00% - 24.00%	17.00% - 27.00%
Lease contract receivables	8.00% - 18.00%	8.00% - 19.00%	8.00% - 20.00%
Receivables financed	8.00% - 14.00%	8.00% - 14.00%	11.00% - 12.50%

Included in UDSCL is a 10-year note with carrying amount of P485 and P801 as of December 31, 2019 and 2018, respectively, and bears 6.44% interest per annum. This pertains to the agreement entered into in June 2017 with a third party for the sale of various foreclosed real properties with book value of P1,127, for a total consideration of P1,385; of which P396 and P989 (with present value of P742 on date of sale) were in the form of cash and note receivable, respectively. Accordingly, the Group recognized a gain on sale amounting to P11 and is presented as part of Gains on assets sold under Miscellaneous income in the 2017 statement of profit or loss (see Notes 15.3 and 25.1).

Included also in UDSCL as of December 31, 2018 is a 10-year note from Philippine Asset Growth One, Inc. (PAGO) with a face amount of P731, which is part of the consideration received in relation to the Parent Company's disposal in February 2013 of its non-performing assets (NPAs), consisting of non-performing loans (NPLs) with a carrying amount of P507 and non-performing investment properties with a carrying amount of P1,236. This note receivable carries a variable interest rate of 1.00% per annum during the first five years, 7.00% per annum in the sixth to seventh year, and 7.50% per annum in the last three years. This note receivable has been written off in 2019.

Also included in the Parent Company's accounts receivables is the amount due from RCBC JPL which was acquired from Rizal Microbank in 2015 amounting to P222. As of December 31, 2019 and 2018, the outstanding balance amounted to P172 and P182, respectively. The receivable amount is unsecured, noninterest-bearing and payable in cash on demand (see Note 28). The receivable has been appropriately provided with allowance for ECL.

Interest income earned by the Bank from its loans and other receivables is broken down as follows:

	Group		
	2019	2018	2017
Loans and discounts	P 25,529	P 21,768	P 17,978
Credit card receivables	5,939	4,509	3,573
Others (see Note 9)	1,178	760	405
	<u>P 32,646</u>	<u>P 27,037</u>	<u>P 21,956</u>
	Parent		
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Loans and discounts	P 24,644	P 20,989	P 17,343
Credit card receivables	5,939	4,509	3,573
Others (see Note 9)	1,165	760	405
	<u>P 31,748</u>	<u>P 26,258</u>	<u>P 21,321</u>

### 11.1 Credit Concentration and Security of Receivables from Customers

The concentration of credit of receivables from customers as to industry follows:

	Group			
	2019		2018	
	Amount	Share	Amount	Share
Consumer	P 134,301	31%	P 115,151	30%
Electricity, gas and water	78,553	18%	74,380	19%
Real estate, renting and other related activities	54,244	12%	51,498	13%
Wholesale and retail trade	43,572	10%	40,454	10%
Manufacturing (various industries)	40,816	10%	44,056	11%
Financial intermediaries	38,617	9%	24,262	7%
Transportation and communication	20,505	5%	18,239	5%
Other community, social and personal activities	7,595	2%	6,731	2%
Agriculture, fishing, and forestry	5,439	1%	4,271	1%
Hotels and restaurants	4,109	1%	3,888	1%
Mining and quarrying	1,293	-	1,449	-
Others	5,219	1%	4,694	1%
	<b>P 434,263</b>	<b>100%</b>	<b>P 389,073</b>	<b>100%</b>

	Parent Company			
	2019		2018 (As restated)	
	Amount	Share	Amount	Share
Consumer	P 133,123	31%	P 113,930	30%
Electricity, gas and water	78,553	18%	74,379	19%
Real estate, renting and other related activities	52,881	12%	53,100	14%
Wholesale and retail trade	42,698	11%	39,669	11%
Manufacturing (various industries)	40,271	9%	43,355	11%
Financial intermediaries	38,617	9%	24,262	6%
Transportation and communication	16,963	4%	16,077	4%
Other community, social and personal activities	7,595	2%	5,956	2%
Agriculture, fishing, and forestry	5,254	2%	4,003	1%
Hotels and restaurants	4,109	1%	3,937	1%
Mining and quarrying	1,082	-	1,285	-
Others	4,856	1%	2,684	1%
	<b>P 426,002</b>	<b>100%</b>	<b>P 382,637</b>	<b>100%</b>

The breakdown of the receivables from customers' portfolio as to secured and unsecured follows:

	Group		Parent Company	
	2019		2018	
	2019	2018	2019	2018 (As restated – see Note 34)
Secured:				
Real estate mortgage	P 178,500	P 113,299	P 172,226	P 111,954
Chattel mortgage	45,983	44,271	45,960	42,294
Hold-out deposits	8,891	9,814	8,891	9,814
Other securities	12,592	18,733	12,027	17,228
	<b>245,966</b>	<b>186,117</b>	<b>239,104</b>	<b>181,290</b>
Unsecured	<b>188,297</b>	<b>202,956</b>	<b>186,898</b>	<b>201,347</b>
	<b>P 434,263</b>	<b>P 389,073</b>	<b>P 426,002</b>	<b>P 382,637</b>

### 11.2 Non-performing Loans, Restructured Loans and Allowance for Credit Loss

NPLs included in the total loan portfolio of the Group and the Parent Company as of December 31 are presented below.

	Group		Parent Company	
	2019		2018	
	2019	2018	2019	2018 (As restated – see Note 34)
Gross NPLs	P 17,679	P 9,173	P 16,085	P 8,206
Allowance for impairment	( 9,124)	( 4,857)	( 8,544)	( 4,377)
	<b>P 8,555</b>	<b>P 4,316</b>	<b>P 7,541</b>	<b>P 3,829</b>

Under banking regulations, loan accounts shall be considered non-performing, even without any missed contractual payments, when they are considered impaired under existing accounting standards, classified as doubtful or loss, in litigation, and/or there is evidence that full repayment of principal or interest is unlikely without foreclosure of collateral, if any. All other loans, even if not considered impaired, shall be considered non-performing if any principal and/or interest are unpaid for more than 90 days from contractual due date, or accrued interests for more than 90 days have been capitalized, refinanced, or delayed by agreement.

Restructured loans shall be considered non-performing. However, if prior to restructuring, the loans were categorized as performing, such classification shall be retained. Moreover, NPLs shall remain classified as such until (a) there is sufficient evidence to support that full collection of principal and interests is probable and payments of interest and/or principal are received for at least 6 months; or (b) written-off. Microfinance and other small loans with similar credit characteristics shall be considered non-performing after contractual due date or after they have become past due.

The breakdown of restructured receivables from customers follows:

	Group		Parent Company	
	2019		2018	
	2019	2018	2019	2018 (As restated)
Loans and discounts	P 310	P 697	P 310	P 108
Credit card receivables	4	8	4	8
	<b>P 314</b>	<b>P 705</b>	<b>P 314</b>	<b>P 116</b>

Interest income from restructured receivables from customers amounted P5, P6, P11 in 2019, 2018, 2017, respectively, for both the Group and the Parent Company.

A reconciliation of the allowance for impairment on loans and receivables at the beginning and end of 2019 and 2018 is shown below (see Note 16).

	Group		Parent Company	
	2019	2018	2019	2018 (As restated – see Note 34)
Balance at beginning of year	P 10,291	P 9,583	P 9,689	P 9,100
Impairment losses during the year	6,773	1,790	6,553	1,682
Accounts written off and others	(3,634)	(1,082)	(3,516)	(1,093)
Balance at end of year	P 13,430	P 10,291	P 12,726	P 9,689

## 12. INVESTMENTS IN SUBSIDIARIES AND ASSOCIATES

The components of the carrying values of investments in and advances to subsidiaries and associates are as follows (refer to Note 1.2 for the effective percentage of ownership, line of business, and country of incorporation of subsidiaries and associates):

	Note	Group	
		2019	2018
Acquisition costs of associates:			
HCPI		P 91	P 91
LIPC		57	57
YCS		4	4
		<u>152</u>	<u>152</u>
Accumulated equity in net earnings:			
Balance at beginning of year		271	265
Share in net earnings for the year		21	14
Share in actuarial gains on defined benefit plan		-	6
Cash dividends		-	(2)
Others	28	-	(12)
Balance at end of year		<u>292</u>	<u>271</u>
		<u>P 444</u>	<u>P 423</u>

	Note	Parent Company	
		2019	2018 (As restated – see Note 34)
Acquisition costs of subsidiaries:			
RCBC Capital		P 2,231	P 2,231
Rizal Microbank		1,242	1,242
RCBC LFC		1,987	1,187
NPHI		609	609
RCBC JPL		375	375
RCBC Forex		150	150
RCBC Telemoney		72	72
RCBC IFL		58	58
Cajel		51	51
Total acquisition costs		<u>6,775</u>	<u>5,975</u>

	Note	Parent Company	
		2019	2018 (As restated – see Note 34)
Accumulated equity in net earnings:			
Balance at beginning of year		614	557
Share in net earnings for the year		452	273
Share in actuarial gains (losses) on defined benefit plan		(21)	69
Share in fair value gains (losses) on financial assets at FVOCI		251	(388)
Cash dividends	28	(500)	-
Others		(291)	103
Balance at end of year		<u>505</u>	<u>614</u>
		<u>7,280</u>	<u>6,589</u>
Acquisition costs of associates:			
HCPI		91	91
LIPC		57	57
YCS		4	4
		<u>152</u>	<u>152</u>
Accumulated equity in net earnings:			
Balance at beginning of year		271	265
Share in net earnings for the year		21	14
Share in actuarial gains on defined benefit plan		-	6
Cash dividends	28	-	(2)
Share in fair value gains (losses) on financial assets at FVOCI		-	(12)
Balance at end of year		<u>292</u>	<u>271</u>
		<u>444</u>	<u>423</u>
		<u>P 7,724</u>	<u>P 7,012</u>

At the end of each reporting period, the Group has no material interest in unconsolidated structured entities.

Also, the Parent Company and its subsidiaries did not enter in any contractual arrangements to provide financial support to any entities under the Group.

The Parent Company received dividends from its subsidiaries and associates amounting to P500 and nil, respectively, in 2019, and nil and P2, respectively, in 2018, and P315 and P59, respectively, in 2017 (see Note 28).

### 12.1 Information About Investments in Subsidiaries

In May 2018, RCBC North America, Inc. was dissolved which resulted in the reclassification of the cumulative translation adjustment to profit or loss amounting to P32 (see Note 1.2).

In August 2018, the BOD of the Parent Company approved the additional capital infusion to RCBC LFC amounting to P800, which was paid to the latter in November 2018 after RCBC LFC's BOD approved the increase in its authorized capital stock in its meeting held in October 2018. The P800 deposit for future stock subscription presented as part of Other Resources account in the 2018 statement of financial position of the Parent Company (see Note 15) was reclassified as an additional investment in RCBC LFC subsequent to the SEC approval of the increase in authorized capital stock in March 2019.

On February 23, 2015, the Parent Company's BOD approved the subscription to P500 worth of shares of stock of RCBC LFC. In 2016, RCBC LFC filed its application with the SEC for increase in authorized capital stock after it has secured the certificate of authority to amend the articles of incorporation from the BSP. This application was approved by the SEC on April 24, 2018 which resulted in the issuance of shares to the Parent Company, hence, increase in the latter's ownership interest (see Note 1.2).

### 12.2 Information About Investments in Associates

The Parent Company, under a shareholder's agreement, agreed with another stockholder of HCPI to commit and undertake to vote, as a unit, the shares of stock thereof, which they proportionately own and hold, and to regulate the conduct of the voting and the relationship between them with respect to their exercise of their voting rights. As a result of this agreement, the Parent Company is able to exercise significant influence over the operating and financial policies of HCPI. Thus, HCPI has been considered by the Parent Company as an associate despite holding only 12.88% ownership interest.

The table below presents the summary of the unaudited financial information of the Group's significant associates as of and for the years ended December 31:

	<u>Resources</u>	<u>Liabilities</u>	<u>Revenues</u>	<u>Net Profit (Loss)</u>
<b>2019:</b>				
HCPI	P 5,745	P 2,407	P 19,700	P 156
LIPC	1,030	5,250	28	18
<b>2018:</b>				
HCPI	P 6,910	P 3,717	P 27,664	P 35
LIPC	993	5,236	29	( 482 )

On February 22, 2020, HCPI announced its plan to cease its production facility in Laguna in consideration of efficient allocation and distribution of its resources in Asia and Oceania. Automobile sales and after-sales services will continue through its regional network.

## 13. BANK PREMISES, FURNITURE, FIXTURES AND EQUIPMENT

The gross carrying amounts and accumulated depreciation and amortization of bank premises, furniture, fixtures and equipment at the beginning and end of 2019 and 2018 are shown below.

	<u>Group</u>					
	<u>Land</u>	<u>Buildings</u>	<u>Furniture, Fixtures and Equipment</u>	<u>Leasehold Rights and Improvements</u>	<u>Right-of- use Asset</u>	<u>Total</u>
<b>December 31, 2019</b>						
Cost	P 1,270	P 3,673	P 10,161	P 1,094	P 3,283	P 19,481
Accumulated depreciation and amortization	-	( 1,563 )	( 6,041 )	-	( 818 )	( 8,422 )
Net carrying amount	<u>P 1,270</u>	<u>P 2,110</u>	<u>P 4,120</u>	<u>P 1,094</u>	<u>P 2,465</u>	<u>P 11,059</u>

	<u>Group</u>					
	<u>Land</u>	<u>Buildings</u>	<u>Furniture, Fixtures and Equipment</u>	<u>Leasehold Rights and Improvements</u>	<u>Right-of- use Asset</u>	<u>Total</u>
<b>December 31, 2018</b>						
Cost	P 1,270	P 3,400	P 11,032	P 1,123	P -	P 16,825
Accumulated depreciation and amortization	-	( 1,400 )	( 7,010 )	-	-	( 8,410 )
Net carrying amount	<u>P 1,270</u>	<u>P 2,000</u>	<u>P 4,022</u>	<u>P 1,123</u>	<u>P -</u>	<u>P 8,415</u>
<b>January 1, 2018</b>						
Cost	P 1,283	P 3,368	P 9,684	P 1,167	P -	P 15,502
Accumulated depreciation and amortization	-	( 1,318 )	( 5,238 )	-	-	( 6,556 )
Net carrying amount	<u>P 1,283</u>	<u>P 2,050</u>	<u>P 4,446</u>	<u>P 1,167</u>	<u>P -</u>	<u>P 8,946</u>
	<u>Parent Company</u>					
	<u>Land</u>	<u>Buildings</u>	<u>Furniture, Fixtures and Equipment</u>	<u>Leasehold Rights and Improvements</u>	<u>Right-of- use Asset</u>	<u>Total</u>
<b>December 31, 2019</b>						
Cost	P 1,249	P 3,625	P 8,193	P 1,056	P 3,208	P 17,331
Accumulated depreciation and amortization	-	( 1,534 )	( 5,919 )	-	( 807 )	( 8,260 )
Net carrying amount	<u>P 1,249</u>	<u>P 2,091</u>	<u>P 2,274</u>	<u>P 1,056</u>	<u>P 2,401</u>	<u>P 9,071</u>
<b>December 31, 2018</b> (As restated – see Note 34)						
Cost	P 1,249	P 3,355	P 7,933	P 1,058	P -	P 13,595
Accumulated depreciation and amortization	-	( 1,374 )	( 5,540 )	-	-	( 6,914 )
Net carrying amount	<u>P 1,249</u>	<u>P 1,981</u>	<u>P 2,393</u>	<u>P 1,058</u>	<u>P -</u>	<u>P 6,681</u>
<b>January 1, 2018</b> (As restated – see Note 34)						
Cost	P 1,249	P 3,295	P 7,674	P 1,111	P -	P 13,329
Accumulated depreciation and amortization	-	( 1,276 )	( 5,099 )	-	-	( 6,375 )
Net carrying amount	<u>P 1,249</u>	<u>P 2,019</u>	<u>P 2,575</u>	<u>P 1,111</u>	<u>P -</u>	<u>P 6,954</u>



A reconciliation of the carrying amounts of bank premises, furniture, fixtures and equipment at the beginning and end of 2019 and 2018 is shown below.

	Group					Total
	Land	Buildings	Furniture, Fixtures and Equipment	Leasehold Rights and Improvements	Right-of-Use Asset	
Balance at January 1, 2019, net of accumulated depreciation and amortization	P 1,270	P 2,000	P 4,022	P 1,123	P -	P 8,415
Effect of PFRS 16 adoption	-	-	-	-	3,106	3,106
Additions	-	298	1,092	855	323	2,568
Disposals	-	(68)	(109)	(585)	(146)	(908)
Depreciation and amortization charges for the period	-	(120)	(885)	(299)	(818)	(2,122)
<b>Balance at December 31, 2019, net of accumulated depreciation and amortization</b>	<b>P 1,270</b>	<b>P 2,110</b>	<b>P 4,120</b>	<b>P 1,094</b>	<b>P 2,465</b>	<b>P 11,059</b>
Balance at January 1, 2018, net of accumulated depreciation and amortization	P 1,283	P 2,050	P 4,446	P 1,167	P -	P 8,946
Additions	-	47	877	290	-	1,214
Disposals	(13)	(12)	(296)	(10)	-	(331)
Reclassification	-	2	(131)	129	-	-
Depreciation and amortization charges for the period	-	(87)	(874)	(453)	-	(1,414)
<b>Balance at December 31, 2018, net of accumulated depreciation and amortization</b>	<b>P 1,270</b>	<b>P 2,000</b>	<b>P 4,022</b>	<b>P 1,123</b>	<b>P -</b>	<b>P 8,415</b>

	Parent Company					Total
	Land	Buildings	Furniture, Fixtures and Equipment	Leasehold Rights and Improvements	Right-of-Use Asset	
Balance at January 1, 2019 (As restated – see Note 34), net of accumulated depreciation and amortization	P 1,249	P 1,981	P 2,393	P 1,058	P -	P 6,681
Effect of PFRS 16 adoption	-	-	-	-	2,972	2,972
Additions	-	296	574	847	340	2,057
Disposals	-	(68)	(100)	(559)	(104)	(831)
Depreciation and amortization charges for the period	-	(118)	(593)	(290)	(807)	(1,808)
<b>Balance at December 31, 2019, net of accumulated depreciation and amortization</b>	<b>P 1,249</b>	<b>P 2,091</b>	<b>P 2,274</b>	<b>P 1,056</b>	<b>P 2,401</b>	<b>P 9,071</b>
Balance at January 1, 2018, net of accumulated depreciation and amortization	P 1,249	P 2,019	P 2,575	P 1,111	P -	P 6,954
Additions	-	80	631	269	-	980
Disposals	-	(4)	(192)	(31)	-	(227)
Reclassification	-	-	-	-	-	-
Depreciation and amortization charges for the period	-	(114)	(621)	(291)	-	(1,026)
<b>Balance at December 31, 2018, net of accumulated depreciation and amortization</b>	<b>P 1,249</b>	<b>P 1,981</b>	<b>P 2,393</b>	<b>P 1,058</b>	<b>P -</b>	<b>P 6,681</b>

Under BSP rules, investments in bank premises, furniture, fixtures and equipment should not exceed 50% of the respective unimpaired capital of the Parent Company and its bank subsidiaries. As of December 31, 2019 and 2018, the Parent Company and its bank subsidiary have satisfactorily complied with this BSP requirement.

The cost of the Group and the Parent Company's fully-depreciated bank premises, furniture, fixtures and equipment that are still in use in operations is P6,503 and P6,476, respectively, as of December 31, 2019, and P5,136 and P4,357, respectively, as of December 31, 2018.

The Group has leases for certain offices and branches. With the exception of short-term leases and leases of low-value underlying assets, each lease is reflected on the statement of financial position as a Right-of-use asset and a Lease liability. Variable lease payments which do not depend on an index or a rate are excluded from the initial measurement of the Lease liability and Right-of-use asset.

Each lease generally imposes a restriction that, unless there is a contractual right for the Group to sublet the asset to another party, the Right-of-use asset can only be used by the Group. Leases are either non-cancellable or may only be cancelled by incurring a substantive termination fee. Some leases contain an option to purchase the underlying lease asset outright at the end of the lease, or to extend the lease for a further term. The Group is prohibited from selling or pledging the underlying leased assets as security. For leases over branches and offices, the Group must keep those properties in a good state of repair and return the properties in their original condition at the end of the lease. Further, the Group must insure the leased assets and incur maintenance fees on such items in accordance with the lease contracts.

The use of extension and termination options gives the Group added flexibility in the event it has identified more suitable premises in terms of cost and/or location or determined that it is advantageous to remain in a location beyond the original lease term. An option is only exercised when consistent with the Group's regional markets strategy and the economic benefits of exercising the option exceeds the expected overall cost.

## 14. INVESTMENT PROPERTIES

Investment properties pertain to land, buildings or condominium units acquired by the Group, in settlement of loans from defaulting borrowers through foreclosure or dacion in payment and properties which are held for rental.

The gross carrying amounts and accumulated depreciation and impairment losses of investment properties at the beginning and end of 2019 and 2018 are shown below.

	<u>Group</u>			<u>Parent Company</u>		
	<u>Land</u>	<u>Buildings</u>	<u>Total</u>	<u>Land</u>	<u>Buildings</u>	<u>Total</u>
<b>December 31, 2019</b>						
Cost	P 1,797	P 3,035	P 4,832	P 1,649	P 3,016	P 4,665
Accumulated depreciation	-	( 638)	( 638)	-	( 625)	( 625)
Accumulated impairment (see Note 16)	( 18)	( 34)	( 52)	( 18)	( 5)	( 23)
Net carrying amount	<u>P 1,779</u>	<u>P 2,363</u>	<u>P 4,142</u>	<u>P 1,631</u>	<u>P 2,386</u>	<u>P 4,017</u>
December 31, 2018 (As restated – see Note 34)						
Cost	P 1,566	P 2,659	P 4,225	P 1,414	P 2,644	P 4,058
Accumulated depreciation	-	( 502)	( 502)	-	( 488)	( 488)
Accumulated impairment (see Note 16)	( 92)	-	( 92)	( 54)	( 11)	( 65)
Net carrying amount	<u>P 1,474</u>	<u>P 2,157</u>	<u>P 3,631</u>	<u>P 1,360</u>	<u>P 2,144</u>	<u>P 3,505</u>
January 1, 2018 (As restated – see Note 34)						
Cost	P 2,472	P 1,534	P 4,006	P 1,792	P 2,038	P 3,830
Accumulated depreciation	-	( 549)	( 549)	-	( 458)	( 458)
Accumulated impairment (see Note 16)	( 58)	-	( 58)	( 61)	( 41)	( 102)
Net carrying amount	<u>P 2,414</u>	<u>P 985</u>	<u>P 3,399</u>	<u>P 1,731</u>	<u>P 1,539</u>	<u>P 3,270</u>

The reconciliations of the carrying amounts of investment properties at the beginning and end of 2019 and 2018 follow:

	<u>Group</u>		<u>Parent Company</u>	
	<u>2019</u>	<u>2018</u>	<u>2019</u>	<u>2018</u>
Balance at January 1, net of accumulated depreciation and impairment	P 3,631	P 3,399	P 3,505	P 3,270
Additions	924	672	912	818
Disposals	( 294)	( 382)	( 281)	( 325)
Reclassification	-	39	-	-
Depreciation charges for the year	( 105)	( 97)	( 105)	( 169)
Impairment losses	( 14)	( 89)	( 14)	( 89)
Balance at December 31, net of accumulated depreciation and impairment	<u>P 4,142</u>	<u>P 3,631</u>	<u>P 4,017</u>	<u>P 3,505</u>

As of December 31, 2019 and 2018, there is no restriction on the realizability of investment properties or the remittance of income and proceeds of disposal therefrom.

### 14.1 Additions and Disposals of Investment Properties

The Group and the Parent Company foreclosed real and other properties totaling P924 and P912, respectively, in 2019, and P672 and P818, respectively, in 2018, in settlement of certain loan accounts.

As of December 31, 2019 and 2018, foreclosed investment properties still subject to redemption period by the borrowers amounted to P297 and P518, respectively, for the Group and P213 and P498, respectively, for the Parent Company.

The total gain recognized by the Group and the Parent Company from disposals of investment properties both amounted to P211 in 2019, P26 in 2018, and P159 and P33, respectively, in 2017, which is presented as part of Gains on assets sold – net under Miscellaneous Income account in the statements of profit or loss (see Note 25.1).

### 14.2 Income and Expenses from Investment Properties Held for Rental

The Group and Parent Company earned rental income from investment properties amounting to P275 both in 2019, P414 both in 2018, and P416 and P400, respectively, in 2017 and are presented as part of Rentals under Miscellaneous Income account in the statement of profit or loss [see Notes 25.1 and 28.5(a)]. Expenses incurred by the Group and Parent Company in relation to the investment properties include taxes and licenses amounting to P20 and P17, respectively, in 2019, P54 and P32, respectively, in 2018, and P41 and P15, respectively, in 2017.

### 14.3 Valuation and Measurement of Investment Properties

The fair value of investment properties as of December 31, 2019 and 2018, based on the available appraisal reports, amounted to P10,045 and P7,624, respectively, for the Group; and, P9,595 and P7,284, respectively, for the Parent Company (see Note 7.4).

## 15. OTHER RESOURCES

Other resources consist of the following:

	Notes	Group		Parent Company	
		2019	2018	2019	2018 (As restated – See Note 34)
Assets held-for-sale and disposal group	15.3	P 3,206	P 931	P 2,666	P 671
Creditable withholding taxes		2,393	2,362	2,371	2,253
Branch licenses	15.1	1,000	1,000	1,000	1,000
Software – net	15.2	902	945	895	934
Prepaid expenses	15.4	883	717	733	683
Refundable and other deposits		739	736	737	733
Goodwill	15.5	426	426	269	269
Unused stationery and supplies		354	298	345	292
Deferred charges		179	121	177	118
Returned checks and other cash items		90	171	90	171
Margin deposits	15.6	40	19	40	19
Deposit for future stock subscription	12.1	-	-	-	800
Miscellaneous	15.7	1,119	1,533	791	758
		11,331	9,259	10,114	8,701
Allowance for impairment	15.5, 16	(723)	(237)	(591)	(70)
		P 10,608	P 9,022	P 9,523	P 8,631

### 15.1 Branch Licenses

Branch licenses represent the rights granted by the BSP to the Parent Company in 2015 to establish a certain number of branches in the restricted areas in the country. Branch licenses are annually tested for impairment either individually or at the cash generating unit level, as appropriate when circumstances indicate that the intangible asset may be impaired. As of December 31, 2019 and 2018, the Group has assessed that the recoverable amount of these branch licenses is higher than the carrying value; hence, no impairment loss is required to be recognized in the statements of profit or loss.

### 15.2 Software

A reconciliation of the carrying amounts of software at the beginning and end of 2019 and 2018 is shown below.

	Group		Parent Company	
	2019	2018	2019	2018 (As restated – See Note 34)
Balance at beginning of year	P 945	P 1,035	P 934	P 1,051
Additions	233	179	231	156
Amortization	(276)	(269)	(270)	(273)
	P 902	P 945	P 895	P 934

Amortization charges for software are included as part of Depreciation and Amortization account in the statements of profit or loss.

### 15.3 Assets Held-for-Sale and Disposal Group

	Group		Parent Company	
	2019	2018	2019	2018 (As restated – see Note 34)
Equity securities	P 1,860	P -	P 1,860	P -
Foreclosed real properties	692	435	258	268
Foreclosed automobiles	654	496	548	403
	3,206	931	2,666	671
Allowance for impairment	(591)	(70)	(591)	(70)
Balance at end of year	P 2,615	P 861	P 2,075	P 601

Assets held-for-sale represents assets that are approved by management to be immediately sold in its present condition and management believes that the sale is highly probable at the time of reclassification. These mainly include real properties, automobiles, equipment and other assets foreclosed by the Parent Company and RCBC LFC in settlement of loans.

#### 15.3.1 HHIC Equity Securities

In May 2019, RCBC, together with other local banks, entered into a Detailed Implementing Agreement with Hanjin Heavy Industries and Construction Philippines (HHIC-Phil), a subsidiary of Hanjin Heavy Industry Co., Ltd. (HHIC), a Korean shipbuilding company, to convert a part of the former's debt into a 20% stake in HHIC (see Note 29.7). Accordingly, in June 2019, the Bank received 7,100,129 common shares representing 8.53% ownership in HHIC in settlement of HHIC-Phil's gross outstanding loan amounting to USD63.5 million or P3,286. The Bank intends to sell its share after the lapse of the lock-up agreement on November 22, 2019.

The management is committed to sell the shares and believes that the disposal of the investment will occur within 12 months after the end of the reporting period. As a result, and as required under PFRS 5, *Non-current Assets Held for Sale and Discontinued Operations*, the carrying amount of the investment is at the lower of their carrying amounts, immediately prior to its classification as held-for-sale and its fair value less costs to sell.

#### 15.3.2 Other Foreclosed Assets

In 2015, the Parent Company classified a portion of investment properties amounting to P1,351 as assets held-for-sale since the carrying amount of those properties will be recovered principally through a sale transaction. The properties were readily available for immediate sale in its present condition and that management believes that the sale was highly probable at the time of reclassification. In June 2017, the properties were sold to a third party with total consideration of P1,385; of which P396 and P989 (present value is P742) were in the form of cash and note receivable, respectively (see Note 11).

In 2013, the Parent Company entered into a joint venture agreement with a third party developer to develop certain investment properties for the purpose of recovering the cost through eventual sale which led to the reclassification of the properties amounting to P337 as assets held-for-sale. This joint arrangement is accounted for as a jointly controlled operation as there was no separate entity created under this joint venture agreement. The joint venture agreement stipulates that the Parent Company shall contribute parcels of land and the co-venturer shall be responsible for the planning, conceptualization, design, construction, financing and marketing of units to be constructed on the properties.

In 2017, the joint venture agreement was terminated and both parties entered into a contract of sale, with the joint venturer property developer purchasing the properties contributed by the Parent Company at a consideration of P551 resulting in a gain from sale of P198, which is recognized as part of Gains on assets sold – net under Miscellaneous Income account in the 2017 statement of profit or loss (see Note 25.1). The outstanding receivables related to this transaction as of December 31, 2017 amounted to P463 and is presented as part of Accounts receivables under Loans and Receivables account in the 2017 statement of financial position (see Note 11).

In 2009, in accordance with the letter received by RSB from BSP dated March 26, 2009,

separate financial statements which resulted in the inclusion of the assets, liabilities, income and expenses of the SPCs of RSB in the Group's consolidated financial statements.

The approval of the BSP through the MB is subject to the following conditions: (i) RSB should immediately dissolve the SPCs once the underlying dacioned real property assets were sold or disposed of; and, (ii) the equity investments in the SPCs shall be disposed of within a reasonable period of time.

In partial compliance with the requirements of the BSP, the management of RSB resolved that certain SPCs be disposed of through the conversion of the SPCs' existing common shares into redeemable preferred shares which shall be subsequently redeemed. Accordingly, at their special meeting held on September 30, 2013, the respective BOD and the stockholders of the SPCs approved that a portion of the common shares of the SPCs owned by RSB shall be converted to redeemable preferred shares and that for such purpose, the Articles of Incorporation of the SPCs below have been amended. The amendment was approved by the SEC on November 28, 2013:

- |                   |                |
|-------------------|----------------|
| (a) Goldpath      | (g) Princeway  |
| (b) Eight Hills   | (h) Greatwings |
| (c) Crescent Park | (i) Top Place  |
| (d) Niceview      | (j) Crestview  |
| (e) Lifeway       | (k) Best Value |
| (f) Gold Place    |                |

On December 23, 2013, the BOD of RSB approved the foregoing SPCs' redemption of the SPCs' respective preferred shares for a total consideration of P1,555. This transaction resulted in the recognition of a redemption loss by RSB amounting to P185 which is reported in the 2013 consolidated financial statements of the Group as part of Other Reserves account pending the eventual retirement of these redeemable preferred shares.

On May 30, 2014 and on October 16, 2014, the retirement of the preferred shares was approved by the BOD and SEC, respectively; hence, the retirement of shares was executed by RSB. Consequently, the amount of the redemption loss was transferred directly to Surplus account from Other Reserves account as the redemption of shares of these SPCs is considered transaction between owners within the Group (see Note 23.7).

In relation to the SPCs disposal plan and to fully comply with the requirements of the BSP, the BOD of RSB has approved in its meeting held on May 30, 2014 the shortening of the corporate life of these SPCs until December 31, 2015 which was approved by the SEC in various dates during the last quarter of 2014. In 2019, the Group has completed the liquidation of the operations of SPCs. NPHI and Cajel are retained by the Parent Company and are presented under Investment in Subsidiaries and Associates account (see Note 12).

#### 15.4 Prepaid Expenses

Prepaid expenses include prepayments for insurance, taxes and licenses, and software maintenance.

#### 15.5 Goodwill

The Parent Company recognized goodwill amounting to P269 which arose from its acquisition of the net assets of another bank in 1998 from which it had expected future economic benefits and synergies that will result from combining the operations of the acquired bank.

Goodwill is subject to annual impairment testing and whenever there is an indication of impairment. In 2019 and 2018, the Parent Company engaged a third party consultant to perform an independent impairment testing of goodwill. The recoverable amount of the CGU has been based on Value-in-Use (VIU) calculation using the cash flow projections from financial budgets approved by the Parent Company's senior management covering a five-year period. Key assumptions in VIU calculation of CGUs are most sensitive to discount rates and growth rates used to project cash flows. Future cash flows and growth rates were based on experience, strategies developed, and prospects. The discount rate used for the computation of the net present value is the cost of equity and was determined by reference to comparable entities within the industry. In 2019 and 2018, the discount rate applied to cash flow projections is 12.89% and 9.32%, respectively, while the growth rate used to extrapolate cash flows beyond five-year period is 6.41% and 6.10% for 2019 and 2018, respectively. On the basis of the report of the third party consultant dated February 4, 2020 and January 16, 2019 with valuation date as of the end of 2019 and 2018, respectively, the Group has assessed that the recoverable amount of the goodwill is higher than its carrying value. Accordingly, no impairment loss is required to be recognized in the statements of profit or loss in both years.

In addition, the goodwill pertaining to the acquisition of Rizal Microbank amounting to P157 million was fully provided with impairment in 2011.

#### 15.6 Margin Deposits

Margin deposits serve as security for outstanding financial market transactions and other liabilities. These are designed to provide additional credit risk protection for counterparty exposures.

#### 15.7 Miscellaneous

Miscellaneous account includes various deposits, advance rentals, service provider fund and other assets.

### ALLOWANCE FOR EXPECTED CREDIT LOSS AND IMPAIRMENT

Changes in the amounts of allowance for impairment are summarized below.

	Notes	Group		Parent Company	
		2019	2018	2019	2018 (As restated – See Note 34)
Balance at beginning of year					
Loans and receivables	11	P 10,291	P 9,583	P 9,689	P 9,100
Investment securities					
at amortized cost	10.3	135	111	45	17
Investment properties	14	92	58	65	102
Other resources	15	237	191	70	33
		<u>10,755</u>	<u>9,943</u>	<u>9,869</u>	<u>9,252</u>

	Notes	Group		Parent Company	
		2019	2018	2019	2018 (As restated – See Note 34)
Impairment losses (recovery):					
Loans and receivables	11	6,773	1,790	6,553	1,682
Investment securities at at amortized cost	10.3	4	24	-	15
Loan commitments		4	(13)	23	(13)
Investment properties	14	14	89	14	89
Other resources	15	602	9	602	9
		<u>7,397</u>	<u>1,899</u>	<u>7,192</u>	<u>1,782</u>
Charge-offs and other adjustments during the year		(3,790)	(1,105)	(3,672)	(1,345)
Balance at end of year					
Loans and receivables	11	13,430	10,291	12,726	9,689
Investment securities at at amortized cost	10.3	139	135	49	45
Investment properties	14	52	92	23	65
Other resources	15	723	237	591	70
		<u>P 14,344</u>	<u>P 10,755</u>	<u>P 13,389</u>	<u>P 9,869</u>

## 17. DEPOSIT LIABILITIES

The following is the breakdown of deposit liabilities (see also Note 28.2):

	Group		Parent Company	
	2019	2018	2019	2018 (As restated – See Note 34)
Demand	P 70,523	P 56,413	P 70,971	P 57,004
Savings	179,247	174,107	179,418	174,198
Time	198,629	179,724	198,022	179,172
Long-term Negotiable Certificate of Deposits (LTNCD)	8,182	13,155	8,182	13,155
	<u>P 456,581</u>	<u>P 423,399</u>	<u>P 456,593</u>	<u>P 423,529</u>

The Parent Company's LTNCD as of December 31 are as follows:

Issuance Date	Maturity Date	Coupon Interest	Outstanding Balance	
			2019	2018
September 28, 2018	March 28, 2024	5.50%	P 3,580	P 3,580
August 11, 2017	February 11, 2023	3.75%	2,502	2,502
December 19, 2014	June 19, 2020	4.13%	2,100	2,100
November 14, 2013	May 14, 2019	3.25%	-	2,860
November 14, 2013	May 14, 2019	0.00%	-	2,113
			<u>P 8,182</u>	<u>P 13,155</u>

The Parent Company's LTNCD were used in the expansion of its term deposit base to support long-term asset growth and for other general funding purposes.

Analysis of unamortized debt issue cost is as follows:

	2019	2018	2017
Balance at beginning of the year	P 27	P 20	P 8
Additions	-	8	15
Amortization	(1)	(1)	(3)
Balance at end of the year	<u>P 26</u>	<u>P 27</u>	<u>P 20</u>

Amortization of debt issue cost is recorded as part of Interest expense in the statements of profit or loss.

The Group's deposit liabilities bear annual interest as follows:

	2019	2018	2017
Demand, Savings and Time deposits	0.10% - 4.50%	0.11% - 3.28%	0.10% - 1.84%

The total interest expense incurred by the Group and the Parent Company on deposit liabilities are as follows:

	Group		
	2019	2018	2017
Demand	P 217	P 199	P 147
Savings	449	491	469
Time	7,149	4,824	2,857
LTNCD	811	781	486
	<u>P 8,626</u>	<u>P 6,295</u>	<u>P 3,959</u>

	Parent Company		
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Demand	P 220	P 201	P 149
Savings	451	469	452
Time	7,116	4,824	2,857
LTNCD	811	781	487
	<u>P 8,598</u>	<u>P 6,275</u>	<u>P 3,945</u>

Under existing BSP regulations, non-FCDU deposit liabilities, including tax exempt LTNCDs, of the Parent Company and Rizal Microbank is subject to reserve requirement of 18% and 8%, respectively, at the start of 2019 until May 30, 2019. BSP reduced the reserve requirement for both Parent Company and Rizal Microbank, Inc. effective May 31, June 28, July 26, November 1 and December 6 by 100 basis points, 50 basis points, 50 basis points, 100 basis points and another 100 basis points, respectively. From December 6, 2019 and thereafter, the Parent Company and Rizal Microbank are subject to reserve requirement equivalent to 14% and 4%, respectively. Peso-denominated LTNCDs of the Parent Company are subject to reserve requirement equivalent to 3% in 2019 and 4% in 2018. As of December 31, 2019 and 2018, the Group is in compliance with such regulatory reserve requirements.

Under BSP Circular No. 1063, *Reduction in Reserve Requirements*, cash in vault and regular reserve deposit accounts with BSP are excluded as eligible forms of compliance for the reserve requirements. The required reserve shall only be kept in the form of demand deposit accounts with the BSP. Available reserves consist of Due from BSP amounting to P51,548, P51,409 and P55,386 for the Group and P51,502, P49,975 and P46,986 for the Parent Company as of December 31, 2019, 2018 and 2017, respectively (see Note 9).

## 18. BILLS PAYABLE

This account consists of borrowings from:

	<u>Group</u>		<u>Parent Company</u>	
	<u>2019</u>	<u>2018</u>	<u>2019</u>	<u>2018</u> (As restated – See Note 34)
Foreign banks	P 68,795	P 40,613	P 68,795	P 40,613
Local banks	32,810	15,386	25,142	8,144
Others	1	2	1	2
	<u>P 101,606</u>	<u>P 56,001</u>	<u>P 93,938</u>	<u>P 48,759</u>

Borrowings from foreign and local banks are subject to annual fixed interest rates as follows:

	<u>2019</u>	<u>2018</u>	<u>2017</u>
<u>Group</u>			
Peso denominated	2.00% - 7.35%	1.06% - 4.50%	0.88% - 2.98%
Foreign currency denominated	0.04% - 2.68%	1.06% - 3.46%	0.10% - 2.86%
<u>Parent Company</u>			
Foreign currency denominated	0.04% - 2.68%	1.06% - 3.46%	0.10% - 2.86%

The total interest expense incurred by the Group on the bills payable amounted to P2,069 in 2019, P1,541 in 2018 and P891 in 2017. The total interest expense incurred by the Parent Company on the bills payable amounted to P1,606 in 2019, P1,204 in 2018 and P636 in 2017.

As of December 31, 2019 and 2018, bills payable availed under repurchase agreements amounting to P75,771 and P20,653 are secured by the Group and Parent Company's investment securities.

## 19. BONDS PAYABLE

The composition of this account for the Group and the Parent Company follows:

<u>Issuance Date</u>	<u>Maturity Date</u>	<u>Coupon Interest</u>	<u>Face Value (in millions)</u>	<u>Outstanding Balance</u>	
				<u>2019</u>	<u>2018</u>
November 13, 2019	November 13, 2022	4.43%	P 7,500	P 7,500	P -
September 11, 2019	September 11, 2024	3.00%	\$ 300	15,154	-
June 4, 2019	June 4, 2021	6.15%	P 8,000	8,000	-
February 1, 2019	August 1, 2020	6.73%	P 15,000	15,000	-
March 15, 2018	March 16, 2023	4.13%	\$ 450	22,710	23,560
November 2, 2015	February 2, 2021	3.45%	\$ 320	16,203	16,826
January 21, 2015	January 22, 2020	4.25%	\$ 243	12,247	12,704
				<u>P 96,814</u>	<u>P 53,090</u>

In November 2019, the Parent Company issued unsecured Peso-denominated Senior Notes with principal amount and outstanding balance as of December 31, 2019 of P7,500 bearing an interest of 4.43% per annum, payable quarterly in arrears on February 13, May 13, August 13 and November 13. The Senior Notes will be redeemed on November 13, 2022.

In September 2019, the Parent Company issued unsecured US\$-denominated Senior Notes with principal amount of US\$300 bearing an interest of 3.00% per annum, payable semi-annually in arrears every March 11 and September 1 of each year. The Senior Notes, unless redeemed, will mature on September 11, 2024. As of December 31, 2019, the peso equivalent of this outstanding bond issue amounted to P15,154.

In June 2019, the Parent Company issued unsecured Peso-denominated Senior Notes with principal amount and outstanding balance as of December 31, 2019 of P8,000 bearing an interest of 6.15% per annum, payable quarterly in arrears every March 4, June 4, September 4 and December 4 of each year. The Senior Notes, unless redeemed, will mature on June 4, 2021.

In February 2019, the Parent Company issued unsecured Peso-denominated Senior Notes with principal amount and outstanding balance as of December 31, 2019 of P15,000 bearing an interest of 6.73% per annum, payable quarterly in arrears on February 1, May 1, August 1 and November 1. The Senior Note will be redeemed on August 1, 2020.

In March 2018, the Parent Company issued unsecured US\$-denominated Senior Notes with principal amount of US\$450 bearing an interest of 4.13% per annum, payable semi-annually in arrears every March 16 and September 16 of each year. The Senior Notes, unless redeemed, will mature on March 16, 2023. As of December 31, 2019 and 2018, the peso equivalent of this outstanding bond issue amounted to P22,710 and P23,560, respectively.

In November 2015, the Parent Company issued unsecured US\$-denominated Senior Notes with principal amount of US\$320 bearing an interest of 3.45% per annum, payable semi-annually in arrears every May 2 and November 2 of each year. The Senior Notes, unless redeemed, will mature on February 2, 2021. As of December 31, 2019 and 2018, the peso equivalent of this outstanding bond issue amounted to P16,203 and P16,826, respectively.

In January 2015, the Parent Company issued unsecured US\$ denominated Senior Notes with principal amount of US\$243 bearing an interest of 4.25% per annum, payable semi-annually in arrears every January 21 and July 21 of each year, which commenced on July 21, 2015. The Senior Notes, unless redeemed, will mature on January 22, 2020. As of December 31, 2019 and 2018, the peso equivalent of this outstanding bond issue amounted to P12,247 and P12,704, respectively.

Unamortized bond premium/discount amounted to P170, P174, and P51 as of December 31, 2019, 2018 and 2017, respectively. The related amortization of unamortized bond premium/discounts is recorded as part of Interest Expense in the statements of profit or loss.

The interest expense incurred on these bonds payable amounted to P3,550 in 2019, P1,911 in 2018, and P1,155 in 2017. The Group and Parent Company recognized foreign currency exchange gains related to these bonds payable amounting to P2,031 in 2019 and foreign currency exchange losses amounting to P1,489 and P118 in 2018 and 2017, respectively, which are netted against Foreign exchange gains presented under Other Operating Income account in the statements of profit or loss.



## 20. SUBORDINATED DEBT

On June 27, 2014, the Parent Company issued P7 billion Basel III-compliant Tier 2 Capital Notes (the “Tier 2 Notes”) which shall be part of the Group’s regulatory capital compliance in accordance with Basel III capital guidelines of the BSP. The Parent Company re-opened the Tier 2 Notes and issued an additional P3 billion of the Notes on September 5, 2014, which constituted a further issuance of, and formed a single series with the existing P7,000 Tier 2 Notes.

The significant terms and conditions of the Tier 2 Notes with an aggregate issue amount of P10,000, are as follows:

- (a) The Tier 2 Notes shall mature on September 27, 2024, provided that they are not redeemed at an earlier date.
- (b) Subject to satisfaction of certain regulatory approval requirements, the Parent Company may, on September 26, 2019, and on any Interest Payment Date thereafter, redeem all of the outstanding Tier 2 Notes at redemption price equal to 100% of its face value together with accrued and unpaid interest thereon. The terms and conditions of the Tier 2 Notes also allow for early redemption upon the occurrence of a Tax Redemption Event or a Regulatory Redemption Event.
- (c) The Tier 2 Notes shall initially bear interest at the rate of 5.375% per annum from and including June 27, 2014 to but excluding September 27, 2019 and shall be payable quarterly in arrears at the end of each interest period on March 27, June 27, September 27 and December 27 of each year.
- (d) Unless the Tier 2 Notes are previously redeemed, the initial interest rate will be reset on September 26, 2019 at the equivalent of the five-year PDST-R2 or the relevant five-year benchmark plus the initial spread of 1.93% per annum. Such reset interest shall be payable quarterly in arrears commencing on September 27, 2019 up to and including September 27, 2024, if not otherwise redeemed earlier.
- (e) The Tier 2 Notes have a loss absorption feature which means the notes are subject to a Non-Viability Write-Down in case of the occurrence of a Non-Viability Event, subject to certain conditions as set out in the terms and conditions of the notes, when the Issuer is considered non-viable as determined by the BSP. Non-Viability is defined as a deviation from a certain level of CET1 ratio or the inability of the Issuer to continue business (closure) or any other event as determined by the BSP, whichever comes earlier. Upon the occurrence of a Non-Viability Event, the Issuer shall write-down the principal amount of the notes to the extent required by the BSP, which could go as low as zero. A Non-Viability Write-Down shall have the following effects:
- (i) it shall reduce the claim on the notes in liquidation;
  - (ii) reduce the amount re-paid when a call or redemption is properly exercised; and,
  - (iii) partially or fully reduce the interest payments on the notes.

On May 27, 2019, the RCBC BOD approved the to exercise its call option and redeem its P10,000 5.375% Tier 2 Notes. The request was subsequently approved by the MB on July 25, 2019, subject to compliance with BSP conditions. On September 26, 2019, the Bank exercised the call option and fully redeemed the notes.

The total interest expense incurred by the Group and Parent Company on the notes amounted to P471 in 2019, P555 in 2018 and P554 in 2017.

## 21. ACCRUED INTEREST, TAXES AND OTHER EXPENSES

The composition of this account follows:

	Group		Parent Company	
	2019	2018	2019	2018 (As restated – See Note 34)
Accrued expenses	P 3,734	P 2,916	P 3,481	P 2,771
Accrued interest	2,285	2,068	2,277	2,063
Taxes payable	183	293	140	227
	<b>P 6,202</b>	<b>P 5,277</b>	<b>P 5,898</b>	<b>P 5,061</b>

Accrued expenses represent mainly the accruals for utilities, employee benefits and other operating expenses. Accrued interest primarily includes unpaid interest on deposit liabilities, bills payable, bonds payable and subordinated debt at the end of each reporting period.

## 22. OTHER LIABILITIES

Other liabilities consist of the following:

	Notes	Group		Parent Company	
		2019	2018	2019	2018 (As restated – See Note 34)
Accounts payable	28.5(b)	P 6,684	P 6,291	P 6,281	P 5,709
Bills purchased – contra		3,383	1,847	3,383	1,847
Post-employment defined benefit obligation	24.2	3,260	1,481	3,243	1,403
Lease liabilities		2,877	-	2,797	-
Outstanding acceptances payable		1,464	880	1,464	880
Manager’s checks		1,434	1,545	1,434	1,545
Derivative financial liabilities	10.1	863	894	863	894
Payment orders payable		671	432	671	432
Deposit on lease contracts		397	471	82	122
Other credits		300	392	300	392
Withholding taxes payable		293	304	283	289
Unearned income		233	380	214	347
Sundry credits		210	125	210	125
ECL provisions on loan commitments	4.4.8(c)	125	94	125	94
Guaranty deposits		115	57	115	57
Advance rentals		71	106	71	106
Due to BSP		26	29	26	29
Miscellaneous		620	344	551	436
		<b>P 23,026</b>	<b>P 15,672</b>	<b>P 22,113</b>	<b>P 14,707</b>

Accounts payable is mainly composed of prepaid card balances of customers, settlement billing from credit card operations and the Group's expenditure purchases which are to be settled within the next reporting period.

The Group and the Parent Company have elected not to recognize lease liabilities for short-term leases or leases of low value assets. Payments made under such leases are expensed on a straight-line basis. In addition, certain variable lease payments are not permitted to be recognized as lease liabilities and are expensed as incurred.

The lease liabilities are secured by the related underlying assets. The undiscounted maturity analysis of lease liabilities at December 31, 2019 is as follows:

Group	Within		Two to		More than		Total	
	1 Year		Five Years		Five Years			
Lease payments	P	1,022	P	1,596	P	705	P	3,323
Finance charges	(	156)	(	198)	(	92)	(	446)
Net present value	<b>P</b>	<b>866</b>	<b>P</b>	<b>1,398</b>	<b>P</b>	<b>613</b>	<b>P</b>	<b>2,877</b>
<b>Parent Company</b>								
Net present value	<b>P</b>	<b>840</b>	<b>P</b>	<b>1,365</b>	<b>P</b>	<b>592</b>	<b>P</b>	<b>2,797</b>

As of December 31, 2019, the Group and Parent Company do not have committed leases, which had not yet commenced.

Total cash outflow in respect of leases amounted to P1,186 and P1,086 for the Group and Parent Company, respectively, in 2019. Interest expense in relation to lease liabilities amounted to P221 and P222 for the Group and Parent Company, respectively, and is presented as part of Interest expense in the 2019 statement of profit or loss.

Miscellaneous liabilities include unclaimed balances for deposits and other miscellaneous liabilities.

## 23. EQUITY

### 23.1 Capital Stock

The movements in the outstanding capital stock of the Parent Company are as follows:

	Number of Shares		
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Preferred stock – voting, non-cumulative non-redeemable, participating, convertible into common stock – P10 par value Authorized – 200,000,000 shares			
Issued and outstanding			
Balance at beginning of year	267,887	276,845	293,987
Conversion of shares during the year	(477)	(8,958)	(17,142)
Balance at end of year	<b>267,410</b>	<b>267,887</b>	<b>276,845</b>

	Number of Shares		
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Common stock – P10 par value			
Authorized:			
Balance at beginning of year	2,600,000,000	1,400,000,000	1,400,000,000
Increase during the year	-	1,200,000,000	-
Balance at end of year	<b>2,600,000,000</b>	<b>2,600,000,000</b>	<b>1,400,000,000</b>
Issued and outstanding:			
Balance at beginning of year	1,935,628,775	1,399,916,364	1,399,912,464
Issuance of shares during the year	-	535,710,378	-
Conversion of shares during the year	121	2,033	3,900
Balance at end of year	<b>1,935,628,896</b>	<b>1,935,628,775</b>	<b>1,399,916,364</b>

As of December 31, 2019 and 2018, there are 750 and 756 holders, respectively, of the Parent Company's listed shares holding an equivalent of 100.00% of the Parent Company's total issued and outstanding shares. Such listed shares closed at P23.00 per share and P28.50 per share as of December 31, 2019 and 2018, respectively.

In 1986, the Parent Company listed its common shares with the PSE. The historical information on the Parent Company's issuance of common shares arising from the initial and subsequent public offerings, including private placements is presented below.

Issuance	Subscriber	Issuance Date	Number of Shares Issued
Initial public offering	Various	November 1986	1,410,579
Stock rights offering	Various	April 1997	44,492,908
Stock rights offering	Various	July 1997	5,308,721
Stock rights offering	Various	August 1997	830,345
Stock rights offering	Various	January 2002	167,035,982
Stock rights offering	Various	June 2002	32,964,018
Follow-on offering	Various	March 2007	210,000,000
Private placement	International Finance Corporation (IFC)	March 2011	73,448,275
Private placement	Hexagon Investments B.V.	September 2011	126,551,725
Private placement	PMMIC	March 2013	63,650,000
Private placement	IFC Capitalization Fund	April 2013	71,151,505
Private placement	Cathay	April 2015	124,242,272
Stock rights offering	Various	July 2018	535,710,378

On May 29, 2006, the Parent Company's stockholders approved the issuance of up to 200,000,000 convertible preferred shares with a par value of P10 per share, subject to the approval, among others, by the PSE. The purpose of the issuance of the convertible preferred shares is to raise the Tier 1 capital pursuant to BSP regulations, thereby strengthening the capital base of the Parent Company and allowing it to expand its operations. On February 13, 2007, the PSE approved the listing application of the underlying common shares for the 105,000 convertible preferred shares, subject to the compliance of certain conditions of the PSE. Preferred shares have the following features:

- Entitled to dividends at floating rate equivalent to the three-month London Interbank Offered Rate (LIBOR) plus a spread of 2.0% per annum, calculated quarterly;
- Convertible to common shares at any time after the issue date at the option of the Parent Company at a conversion price using the adjusted net book value per share of the Parent Company based on the latest available financial statements prepared in accordance with PFRS, adjusted by local regulations;

- (c) Non-redeemable; and,
- (d) Participating as to dividends on a pro rata basis with the common stockholders in the surplus of the Parent Company after dividend payments had been made to the preferred shareholders.

On June 28, 2010, the Parent Company's stockholders owning or representing more than two-thirds of the outstanding capital stock confirmed and ratified the approval by the majority of the BOD on their Executive Session held on May 21, 2010, the proposed increase in Parent Company's authorized capital stock and removal of pre-emptive rights from holders of capital stock, whether common or preferred, to subscribe for or to purchase any shares of stock of any class, by amending the Parent Company's Articles of Incorporation.

The proposed P16,000 authorized capital stock is divided into the following classes of stocks:

- (a) 1,400,000,000 common shares with a par value of ten pesos (P10.00) per share.
- (b) 200,000,000 preferred shares with a par value of ten pesos (P10.00) per share.

The removal of pre-emptive rights was approved by the BSP and SEC on October 20, 2010 and November 4, 2010, respectively. On the other hand, the increase in authorized capital stock of the Parent Company was approved by the BSP and SEC on August 24, 2011 and September 16, 2011, respectively.

Common shares may be transferred to local and foreign nationals and shall, at all times, not be less than 60% and not more than 40% of the voting stock, be beneficially owned by local nationals and by foreign nationals, respectively.

### 23.2 Issuance of Common Shares

On July 22, 2019, the effective date of merger, the Parent Company issued 315,287,248 common shares in exchange of the transfer of net assets of RSB at carrying value. The Parent Company recognized P10,507 as additional paid-in capital, which pertains to the difference between the par value of the shares issued and the carrying value of the net assets of RSB.

On November 27, 2017, the BOD of the Parent Company approved the increase in the Parent Company's authorized capital through the increase in the authorized common stock from 1,400,000,000 shares to 2,600,000,000 shares at P10 par value per share or for a total capital stock of P14,000 to P26,000. The BOD also approved the amendment of the Parent Company's Articles of Incorporation for the principal purpose of reflecting the said increase in authorized capital. These resolutions were approved by the Parent Company's stockholders representing at least two-thirds of its outstanding capital stock in a special meeting held on January 29, 2018. In the same meeting, the Parent Company's BOD approved the stock rights offering (Rights Offer) to be subscribed out of the increase in the authorized capital. The increase in authorized capital stock and the Rights Offer were approved by the BSP and SEC on June 29, 2018 and July 4, 2018, respectively. The offering of the stock rights representing 535,710,378 common shares (with equivalent amount of P5,357) occurred from June 25 to June 29, 2018 and the shares were listed at the PSE on July 16, 2018 (see Note 27). The Rights Offer and issuance generated P15,000 proceeds, reduced by P217 issue costs; hence, resulting in P9,426 excess of consideration received over par value recognized in Capital Paid in Excess of Par account in the 2018 consolidated statement of changes in equity.

In 2015, the Parent Company issued common shares to Cathay at P64 per share for a total issue price of P7,951. This issuance resulted in the recognition of Capital Paid in Excess of Par amounting to P6,709 reduced by the total issuance cost of P222. The acquisition involves Cathay: (i) acquiring from Hexagon Investments B.V., an entity controlled by funds managed by CVC Asia Pacific Limited, 118,935,590 secondary shares at P64 per share, pursuant to a Sale and Purchase Agreement; (ii) acquiring 36,724,138 secondary common shares from IFC Capitalization Fund also at P64 per share, pursuant to a Sale and Purchase Agreement; and, (iii) entering into a shareholders agreement with PMMIC and the Parent Company.

In 2013, the Parent Company issued common shares to PMMIC and IFC Capitalization Fund at P64 and P58 per share for a total issue price of P4,074 and P4,127, respectively. These issuances resulted in the recognition of Capital Paid in Excess of Par amounting to P3,437 and P3,415, respectively, reduced by total issuance costs of P101.

### 23.3 Treasury Shares

In 2019, subsequent to the effective date of the merger, the Parent Company acquired the 315,287,248 common shares issued in exchange of the net assets of RSB equal to the Parent Company's investment in RSB as at December 31, 2018.

On September 23, 2011, the Parent Company issued 5,821,548 common shares (equivalent of 18,082,311 preferred shares and with total par value of P58) from the treasury account reissuance (with total cost of P182) and an additional 120,730,177 common stock (with total par value of P1,207) from unissued portion of the increase in authorized capital stock on September 23, 2011 to Hexagon Investments B.V. that is equivalent to approximately 15.00% of the outstanding common shares. The issuance resulted in the recognition of additional Capital Paid in Excess of Par amounting to P2,264.

On March 17, 2011, the Parent Company issued 73,448,275 common shares, comprising of 50,427,931 treasury shares reissuance (with total cost of P771) and 23,020,344 unissued stock (with total par value of P230), to IFC

Capitalization Fund for a total consideration of P2,130 representing 7.20% ownership interest. The issuance resulted in the recognition of additional Capital Paid in Excess of Par amounting to P1,078.

### 23.4 Surplus and Dividend Declarations

The details of the cash dividend distributions follow:

Date Declared	Dividend		Record Date	Date Approved		Date Paid/Payable
	Per Share	Total Amount		by BOD	by BSP	
January 30, 2017	0.0749	0.02	March 21, 2017	January 30, 2017	March 22, 2017	March 24, 2017
April 24, 2017	0.0807	0.02	June 21, 2017	April 24, 2017	April 26, 2017	June 23, 2017
April 24, 2017	0.5520	772.75	April 27, 2017	April 24, 2017	April 26, 2017	May 25, 2017
April 24, 2017	0.5520	0.15	April 27, 2017	April 24, 2017	April 26, 2017	May 25, 2017
July 31, 2017	0.0840	0.02	September 21, 2017	July 31, 2017	September 5, 2017	September 22, 2017
October 30, 2017	0.0840	0.02	December 21, 2017	October 30, 2017	December 12, 2017	December 22, 2017
January 29, 2018	0.0919	0.02	March 21, 2018	January 29, 2018	March 1, 2018	March 28, 2018
March 26, 2018	0.0616	862.35	June 21, 2018	March 26, 2018	April 5, 2018	May 7, 2018
March 26, 2018	0.0616	0.17	April 27, 2018	March 26, 2018	April 5, 2018	May 7, 2018
April 30, 2018	0.1080	0.03	April 27, 2018	April 30, 2018	June 14, 2018	June 25, 2018
July 30, 2018	0.1108	0.03	September 21, 2018	July 30, 2018	September 4, 2018	September 24, 2018
November 26, 2018	0.0111	0.03	December 21, 2018	November 26, 2018	*	December 28, 2018
February 26, 2019	0.1205	0.03	March 21, 2019	February 26, 2019	*	March 25, 2019
April 29, 2019	0.4460	863.29	May 15, 2019	April 29, 2019	*	May 29, 2019
April 29, 2019	0.4460	0.12	May 15, 2019	April 29, 2019	*	May 29, 2019
May 27, 2019	0.1166	0.03	June 21, 2019	May 27, 2019	*	June 26, 2019
August 27, 2019	0.1121	0.03	September 21, 2019	August 27, 2019	*	September 24, 2019
November 25, 2019	0.1051	0.03	December 21, 2019	November 25, 2019	*	December 26, 2019

\* Not applicable; BSP approval not anymore required during these periods

In 2015, the BSP, through the MB, approved the liberalized rules for banks and quasi-banks on dividend declaration. The policy requires that dividend declaration be immediately recognized as a liability upon the approval of the BOD and that it be disclosed in the statement of changes in equity.

A portion of the Parent Company's surplus corresponding to the equity in net earnings of certain subsidiaries and associates totaling P11,356 and P10,883 as of December 31, 2019 and 2018, respectively, is not currently available for distribution as dividends.

### 23.5 Revaluation Reserves

The components and reconciliation of items of other comprehensive income presented in the statements of changes in equity of the Group and Parent Company at their aggregate amount under Revaluation Reserves account are shown below.

	Revaluation of Financial Assets at FVOCI	Accumulated Translation Adjustments on Foreign Operations	Actuarial Gains (Losses) on Defined Benefit Plan	Total
Balance as of January 1, 2019	P 1,555	P 53	(P 1,342)	P 266
Actuarial losses on defined benefit plan	-	-	( 1,798)	( 1,798)
Fair value loss on financial assets at FVOCI	( 702)	-	-	( 702)
Other comprehensive loss	( 702)	-	( 1,798)	( 2,500)
Transfer from fair value loss on financial asset at FVOCI to Surplus	41	-	-	41
Balance as of December 31, 2019	<b>P 894</b>	<b>P 53</b>	<b>(P 3,140)</b>	<b>(P 2,193)</b>
Balance as of January 1, 2018	P 2,424	P 85	(P 79)	P 2,430
Actuarial losses on defined benefit plan	-	-	( 1,263)	( 1,263)
Fair value loss on financial assets at FVOCI	( 869)	-	-	( 869)
Reversal of cumulative translation adjustment on dissolution of a foreign subsidiary	-	( 32)	-	( 32)
Other comprehensive loss	( 869)	( 32)	( 1,263)	( 2,164)
Balance as of December 31, 2018	<b>P 1,555</b>	<b>P 53</b>	<b>(P 1,342)</b>	<b>P 266</b>
Balance as of January 1, 2017	P 2,584	P 86	(P 1,593)	P 1,077
Fair value losses on financial assets at FVOCI	( 156)	-	-	( 156)
Actuarial gains on defined benefit plan	-	-	1,514	1,514
Translation adjustments on foreign operation	-	( 1)	-	( 1)
Other comprehensive income (loss)	( 156)	( 1)	1,514	1,357
Transfer from fair value gains on financial asset at FVOCI to Surplus	( 4)	-	-	( 4)
Balance as of December 31, 2017	<b>P 2,424</b>	<b>P 85</b>	<b>(P 79)</b>	<b>P 2,430</b>

### 23.6 Appropriation for General Loan Loss Reserves

Pursuant to the requirements of the BSP under Circular No. 1011, the Group shall recognize general loan loss provisions equivalent to one percent of all outstanding loans as of the end of the reporting period, except for accounts considered as credit risk-free under the existing BSP regulations. In cases when the computed allowance for ECL on those exposures is less than one percent of the general loan loss provisions required, the deficiency is recognized through appropriation from the Group's available Surplus. Such appropriation is considered as Tier 2 capital subject to the limit provided under the CAR framework. The outstanding balance of appropriation for General Loan Loss Reserves as of December 31, 2018 amounted to P2,594 and P2,587 for the Group and Parent Company, respectively, and the additional appropriation made in 2019 amounted to P538 and P543 for the Group and Parent Company, respectively.

### 23.7 Other Reserves

On December 23, 2013, the SPCs' BOD approved the redemption of the SPCs' respective preferred shares for a total consideration of P1,555. As a result thereof, the Group incurred a redemption loss amounting to P185 and is presented as part of Other Reserves account in the 2013 statement of financial position. On May 30, 2014 and on October 16, 2014, the BOD and SEC approved the execution of the retirement of the preferred shares resulting from the SPC's redemption on December 31, 2014. Consequently, the amount of the redemption loss of P185 previously recognized in the 2013 consolidated statement of changes in equity of the Group, as part of Other Reserves account, was transferred directly to Surplus (see Note 15.3).

As of December 31, 2019, this account consists of reserves arising from the acquisitions of RCBC LFC and Rizal Microbank for a total of P97.

## 24. EMPLOYEE BENEFITS

### 24.1 Salaries and Employee Benefits Expense

Expenses recognized for salaries and other employee benefits are shown below.

	Group		
	2019	2018	2017
Short-term employee benefits	<b>P 6,470</b>	P 6,034	P 5,617
Post-employment defined benefits	<b>363</b>	528	374
	<b><u>P 6,833</u></b>	<b><u>P 6,562</u></b>	<b><u>P 5,991</u></b>
		Parent Company	
		2018	2017
		(As restated – see Note 34)	(As restated – see Note 34)
	2019		
Short-term employee benefits	<b>P 5,782</b>	P 5,534	P 5,096
Post-employment defined benefits	<b>327</b>	393	378
	<b><u>P 6,109</u></b>	<b><u>P 5,927</u></b>	<b><u>P 5,474</u></b>

## 24.2 Post-employment Defined Benefit Plan

### (a) Characteristics of the Defined Benefit Plan

The Parent Company and certain subsidiaries maintain a funded, tax-qualified, non-contributory post-employment benefit plan that is being administered by the Parent Company's Trust and Investment Group, covering all regular full-time employees. The Parent Company's Trust and Investment Group manages the fund in coordination with the Parent Company's Retirement Committee, Trust Committee and the respective committees of the subsidiaries which act in the best interest of the plan assets and are responsible for setting the investment policies.

The normal retirement age of the Group's employees ranges between 55 to 60 but the plan also provides for an early retirement at age 50 to 55 with a minimum of 10 to 20 years of credited service. The maximum retirement benefit is the lump sum equivalent to two months pay per year of continuous employment based on the employees' salary at retirement. Any fraction of a year shall be computed proportionately.

### (b) Explanation of Amounts Presented in the Financial Statements

Actuarial valuations are made annually to update the post-employment benefit costs and the amount of contributions. All amounts presented below are based on the actuarial valuation reports obtained from independent actuaries in 2019 and 2018.

The amounts of post-employment benefit obligation recognized in the financial statements are determined as follows:

	Group		Parent Company	
	2019	2018	2019	2018
Present value of the obligation	P 6,210	P 4,800	P 6,029	P 4,556
Fair value of plan assets	( 2,950)	( 3,321)	( 2,786)	( 3,153)
Effect of asset ceiling test	-	2	-	-
Deficiency of plan assets	<u>P 3,260</u>	<u>P 1,481</u>	<u>P 3,243</u>	<u>P 1,403</u>

The Group and Parent Company's post-employment defined benefit obligation as of December 31, 2019 and 2018 are included as part of Other Liabilities account in the statements of financial position (see Note 22).

The movements in the present value of the defined benefit obligation follow:

	Group		Parent Company	
	2019	2018	2019	2018
Balance at beginning of year	P 4,800	P 4,995	P 4,556	P 4,757
Current service cost	363	528	327	393
Interest expense	311	303	292	287
Business combinations or disposals	131	-	( 97)	-
Remeasurements – actuarial losses (gains) arising from changes in:				
– financial assumptions	1,248	( 848)	1,483	( 690)
– experience adjustments	( 85)	216	( 71)	190
– demographic assumptions	( 6)	( 9)	-	( 7)
Benefits paid by the plan	( 552)	( 385)	( 461)	( 374)
Balance at end of year	<u>P 6,210</u>	<u>P 4,800</u>	<u>P 6,029</u>	<u>P 4,556</u>

The movements in the fair value of plan assets are presented below.

	Group		Parent Company	
	2019	2018	2019	2018
Balance at beginning of year	P 3,321	P 4,891	P 3,153	P 4,709
Interest income	241	292	207	282
Loss on plan assets (excluding amounts included in net interest)	( 471)	( 1,908)	( 375)	( 1,885)
Contributions paid into the plan	411	431	406	427
Business combinations or disposals	-	-	( 144)	-
Benefits paid by the plan	( 552)	( 385)	( 461)	( 380)
Balance at end of year	<u>P 2,950</u>	<u>P 3,321</u>	<u>P 2,786</u>	<u>P 3,153</u>



Amounts recognized in other comprehensive income were included within items that will not be reclassified subsequently to profit or loss.

In determining the amounts of post-employment obligation, the following ranges of actuarial assumptions were used:

	2019	2018	2017
<b>Group</b>			
Discount rates	4.95% - 5.23%	7.00% - 7.53%	5.48% - 6.00%
Expected rate of salary increases	3.40% - 8.00%	4.00% - 10.50%	4.00% - 8.00%
<b>Parent Company</b>			
Discount rates	5.23%	7.52%, 7.53%	5.73%, 6.00%
Expected rate of salary increases	5.00%	4.00%, 5.00%	4.00%, 5.00%

Assumptions regarding future mortality are based on published statistics and mortality tables. The average life expectancy of an individual retiring at the Group's normal retiring age of 60 is based on the 1994 GAM table, set back six years for females. These assumptions were developed by management with the assistance of an independent actuary. Discount factors are determined close to the end of each reporting period by reference to the interest rates of zero coupon government bonds with terms to maturity approximating to the terms of the post-employment obligation. Other assumptions are based on current actuarial benchmarks and management's historical experience.

(c) *Risks Associated with the Retirement Plan*

The plan exposes the Group to actuarial risks such as investment risk, interest rate risk, longevity risk and salary risk.

(i) *Investment and Interest Rate Risks*

The present value of the defined benefit obligation is calculated using a discount rate determined by reference to market yields of government bonds. Generally, a decrease in the interest rate of a reference government bonds will increase the plan obligation. However, this will be partially offset by an increase in the return on the plan's investments in debt securities and if the return on plan asset falls below this rate, it will create a deficit in the plan.

Currently, the plan assets of the Group are significantly invested in equity and debt securities, while the Group also invests in cash and cash equivalents and other investments. Due to the long-term nature of the plan obligation, a level of continuing equity investments is an appropriate element of the Group's long-term strategy to manage the plan efficiently.

(ii) *Longevity and Salary Risks*

The present value of the defined benefit obligation is calculated by reference to the best estimate of the mortality of the plan participants during their employment, and to their future salaries. Consequently, increases in the life expectancy and salary of the plan participants will result in an increase in the plan obligation.

(d) *Other Information*

The information on the sensitivity analysis for certain significant actuarial assumptions, the Group's asset-liability matching strategy, and the timing and uncertainty of future cash flows related to the post-employment plan are described below.

(i) *Sensitivity Analysis*

The following table summarizes the effects of changes in the significant actuarial assumptions used in the determination of the defined benefit obligation as of December 31, 2019 and 2018:

	<b>Group</b>		
	<b>Change in Assumption</b>	<b>Increase in Assumption</b>	<b>Decrease in Assumption</b>
<b>2019:</b>			
Discount rate	+/- 1%	(P 130)	P 746
Salary growth rate	+/- 1%	746	( 646)
<b>2018:</b>			
Discount rate	+/- 1%	(P 97)	P 465
Salary growth rate	+/- 1%	478	( 421)
	<b>Parent Company</b>		
	<b>Change in Assumption</b>	<b>Increase in Assumption</b>	<b>Decrease in Assumption</b>
<b>2019:</b>			
Discount rate	+/- 1%	(P 63)	P 722
Salary growth rate	+/- 1%	716	( 620)
<b>2018 (RCBC):</b>			
Discount rate	+/- 1%	(P 34)	P 397
Salary growth rate	+/- 1%	404	( 355)
<b>2018 (RSB):</b>			
Discount rate	+/- 1%	P 50	(P 44)
Salary growth rate	+/- 1%	( 51)	46



The sensitivity analysis is based on a change in an assumption while holding all other assumptions constant. This analysis may not be representative of the actual change in the defined benefit obligation as it is unlikely that the change in assumptions would occur in isolation of one another as some of the assumptions may be correlated. Furthermore, in presenting the sensitivity analysis, the present value of the defined benefit obligation at the end of each reporting period has been calculated using the projected unit credit method, which is the same as that applied in calculating the defined benefit obligation recognized in the statements of financial position.

(ii) *Asset-liability Matching Strategies*

To efficiently manage the retirement plan, the Parent Company through its Retirement Plan Committee in coordination with the Parent Company's Trust Departments, ensures that the investment positions are managed considering the computed retirement obligations under the retirement plan. This strategy aims to match the plan assets to the retirement obligations due by investing in assets that are easy to liquidate (i.e., government securities, corporate bonds, equities with high value turnover).

As the Group's retirement obligations are in Philippine peso, all assets are invested in the same currency. The Group actively monitors how the duration and the expected yield of the investments are matching the expected cash outflows arising from the retirement obligations. In view of this, various investments are made in a portfolio that may be liquidated within a reasonable period of time.

A large portion of the plan assets as of December 31, 2019 and 2018 consists of equity securities with the balance invested in fixed income securities and cash and cash equivalents. The Group believes that equity securities offer the best returns over the long term with an acceptable level of risk.

(iii) *Funding Arrangements and Expected Contributions*

The plan is currently underfunded by P3,260 and P3,243 for the Group and Parent Company, respectively, based on the latest funding actuarial valuations in 2019.

The maturity profile of undiscounted expected benefit payments from the plan within 10 years from the end of each reporting period follows:

	<u>Group</u>		<u>Parent Company</u>	
	<u>2019</u>	<u>2018</u>	<u>2019</u>	<u>2018</u>
Less than one year	P 315	P 161	P 310	P 111
More than one year to five years	1,340	1,457	1,230	1,373
More than five years to ten years	3,604	3,581	3,425	3,522
	<u>P 5,259</u>	<u>P 5,199</u>	<u>P 4,965</u>	<u>P 5,006</u>

The Group and Parent Company expect to contribute P483 and P475, respectively, to the plan in 2020.

## 25. MISCELLANEOUS INCOME AND EXPENSES

These accounts consist of the following:

### 25.1 *Miscellaneous Income*

	Notes	<u>Group</u>		
		<u>2019</u>	<u>2018</u>	<u>2017</u>
Rentals	14.2	P 811	P 765	P 741
Dividend income	10	304	189	234
Recoveries from written off assets		179	206	187
Gains on assets sold – net	11, 14.1, 15.3	109	96	441
Others		50	292	290
		<u>P 1,453</u>	<u>P 1,548</u>	<u>P 1,893</u>
<u>Parent Company</u>				
	Notes	<u>2019</u>	<u>2018</u> (As restated – see Note 34)	<u>2017</u> (As restated – see Note 34)
Rentals	14.2, 28.5(a)	P 321	P 282	P 268
Recoveries from written off assets		179	206	187
Dividend income	10.2	95	187	196
Gains on assets sold – net	14.1, 15.3	20	28	658
Others		3	122	181
		<u>P 618</u>	<u>P 825</u>	<u>P 1,490</u>

Miscellaneous income classified as Others includes rebates, penalty charges and other income items that cannot be appropriately classified under any of the foregoing income accounts.

### 25.2 *Miscellaneous Expenses*

	Note	<u>Group</u>		
		<u>2019</u>	<u>2018</u>	<u>2017</u>
Credit card-related expenses		P 1,248	P 894	P 907
Insurance		1,014	946	759
Communication and information services		596	488	447
Management and other professional fees		490	454	368
Litigation/assets acquired expenses		353	228	166
Service and processing fees		348	223	155
Advertising and publicity		278	237	323
Transportation and travel		264	294	214
Banking fees		257	227	193
Stationery and office supplies		223	172	149
Other outside services		152	139	130
Donation and charitable contribution		68	53	51
Representation and entertainment		64	43	22
Membership fees		26	24	19
Others	29.5	1,178	903	1,001
		<u>P 6,559</u>	<u>P 5,325</u>	<u>P 4,904</u>

Notes	Parent Company		
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Credit card-related expenses	P 1,826	P 1,486	P 887
Insurance	996	883	988
Communication and information services	569	467	426
Management and other professional fees	463	421	336
Service and processing fees	348	223	217
Litigation/assets acquired expense	343	223	191
Advertising and publicity	274	234	158
Banking fees	251	221	191
Transportation and travel	250	273	196
Stationery and office supplies	218	167	143
Other outside services	149	137	155
Donations and charitable contributions	68	52	51
Representation and entertainment	54	37	41
Membership fees	25	23	21
Others	29.5 1,078	901	1,210
	<b>P 6,912</b>	<b>P 5,748</b>	<b>P 5,211</b>

Interest allowed as a deductible expense is reduced by an amount equivalent to certain percentage of interest income subjected to final tax. Minimum corporate income tax (MCIT) of 2% on modified gross income is computed and compared with the RCIT. Any excess of the MCIT over the RCIT is deferred and can be used as a tax credit against regular income tax liability in the next three consecutive years. In addition, the Group's net operating loss carry over (NOLCO) is allowed as a deduction from taxable income in the next three consecutive years. Effective May 2004, RA No. 9294 restored the tax exemption of FCDUs and offshore banking units (OBUs). Under such law, the income derived by the FCDU from foreign currency transactions with non-residents, OBUs, local commercial banks including branches of foreign banks is tax-exempt while interest income on foreign currency loans from residents other than OBUs or other depository banks under the expanded system is subject to 10% gross income tax.

Interest income on deposits with other FCDUs and offshore banking units is subject to 7.5% final tax.

In 2019, 2018 and 2017, the Group opted to continue claiming itemized deductions for income tax purposes. The Parent Company's foreign subsidiaries are subject to income and other taxes based on the enacted tax laws of the countries and/or jurisdictions where they operate.

### 26.1 Current and Deferred Taxes

The tax expense as reported in the statements of profit or loss consists of:

	Group		
	2019	2018	2017
Current tax expense:			
Final tax	P 717	P 403	P 203
RCIT	611	664	711
Excess MCIT over RCIT	4	3	2
	<b>1,332</b>	1,070	916
Application of MCIT	-	-	(356)
	<b>1,332</b>	1,070	560
Deferred tax expense (income) relating to origination and reversal of temporary differences	(57)	(198)	281
	<b>P 1,275</b>	<b>P 872</b>	<b>P 841</b>
	Parent Company		
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Current tax expense:			
RCIT	P 498	P 577	P 631
Final tax	698	387	196
	<b>1,196</b>	964	827
Application of MCIT	-	-	(356)
	<b>1,196</b>	964	471
Deferred tax expense (income) relating to origination and reversal of temporary differences	(51)	(227)	257
	<b>P 1,145</b>	<b>P 737</b>	<b>P 728</b>

The Group's other expenses are composed of freight, various processing fees, fines and penalties, and seasonal giveaways. The Group and Parent Company's other expenses also include fees for records, facilities and management services to a related party under common control amounting to P152 and P97, P103 and P78, and P101 and P67 in 2019, 2018 and 2017, respectively (see Note 28).

## 26. INCOME AND OTHER TAXES

Under Philippine tax laws, the Parent Company and its domestic subsidiaries are subject to percentage and other taxes (presented as Taxes and Licenses in the statements of profit or loss), as well as income taxes. Percentage and other taxes paid consist principally of the gross receipts tax (GRT) and documentary stamp tax (DST).

RA No. 9238, which was enacted on February 10, 2004, provides for the reimposition of GRT on banks and non-bank financial intermediaries performing quasi-banking functions and other non-bank financial intermediaries beginning January 1, 2004.

The recognition of liability of the Parent Company and certain subsidiaries for GRT is based on the related regulations issued by the tax authorities.

Income taxes include the regular corporate income tax (RCIT) of 30%, and final tax paid at the rate of 20%, which represents the final withholding tax on gross interest income from government securities and other deposit substitutes.

A reconciliation of tax on pretax profit computed at the applicable statutory rates to tax expense reported in profit or loss is as follows:

	Group		
	2019	2018	2017
Tax on pretax profit at 30%	P 1,999	P 1,558	P 1,545
Adjustments for income subjected to lower income tax rates	( 403)	( 496)	( 434)
Tax effects of:			
Non-deductible expenses	1,110	1,059	595
Non-taxable income	( 1,391)	( 1,239)	( 786)
FCDU income	( 635)	( 182)	( 306)
Recognition of previously unrecognized deferred tax asset	38	123	-
Unrecognized temporary differences	551	46	( 130)
Utilization of NOLCO	( 1)	-	1
Utilization of MCIT	-	-	356
Others	7	3	-
	<u>P 1,275</u>	<u>P 872</u>	<u>P 841</u>
Parent Company			
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Tax on pretax profit at 30%	P 1,956	P 1,517	P 1,511
Adjustments for income subjected to lower income tax rates	( 395)	( 486)	( 430)
Tax effects of:			
Non-deductible expenses	1,096	1,107	577
Non-taxable income	( 1,465)	( 1,247)	( 876)
FCDU income	( 635)	( 182)	( 286)
Unrecognized temporary differences	550	28	( 119)
Recognition of previously unrecognized deferred tax asset	38	-	( 5)
Utilization of MCIT	-	-	356
	<u>P 1,145</u>	<u>P 737</u>	<u>P 728</u>

The deferred tax assets of the Group recognized in the consolidated statements of financial position as of December 31, 2019 and 2018 relate to the operations of the Parent Company and certain subsidiaries as shown below.

	Statements of Financial Position		Statements of Profit or Loss		
	2019	2018	2019	2018	2017
Allowance for impairment	P 1,725	P 1,646	P 79	(P 36)	(P 9)
Excess MCIT	204	105	99	( 1)	( 296)
Provision for credit card reward payments	117	156	( 39)	29	22
Post-employment benefit obligation	86	136	( 50)	84	( 8)
NOLCO	-	3	( 3)	3	-
Others	8	48	( 29)	47	10
Deferred tax assets	<u>P 2,140</u>	<u>P 2,094</u>			
Deferred tax income (expense) – net			<u>P 57</u>	<u>P 198</u>	<u>(P 281)</u>

The deferred tax assets of the Parent Company recognized in its statements of financial position as of December 31, 2019 and 2018 is shown below.

	Statement of Financial Position		Statements of Profit of Loss		
	2019	2018 (As restated – see Note 34)	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Allowance for impairment	P 1,550	P 1,496	P 54	P 136	(P 39)
Excess MCIT	124	105	19	55	( 306)
Provision for credit card reward payments	117	156	( 39)	29	22
Post-employment benefit obligation	77	65	12	( 2)	49
Others	20	52	5	9	17
Deferred tax assets	<u>P 1,888</u>	<u>P 1,874</u>			
Deferred tax income (expense) – net			<u>P 51</u>	<u>P 227</u>	<u>(P 257)</u>

As at January 1, 2019, the adoption of PFRS 16 has resulted to a decrease in net deferred tax assets of the Group and Parent Company amounting to P11 and P37, respectively, from the recognition of Right-of-use assets and Lease liabilities [see Note 2.4(iv)].

The Parent Company and certain subsidiaries have not recognized deferred tax assets on certain temporary differences since management believes that the Parent Company and certain subsidiaries may not be able to generate sufficient taxable profit in the future against which the tax benefits arising from those deductible temporary differences, NOLCO and other tax credits can be utilized.

The unrecognized deferred tax assets relate to the following:

	Group		Parent Company		
	2019	2018	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Allowance for impairment	P 2,304	P 1,441	P 1,961	P 1,688	P 1,161
Excess MCIT	1	4	-	-	-
NOLCO	12	4	-	-	-
Post-employment benefit obligation	892	-	896	( 17)	62
Others	-	-	-	149	210
	<u>P 3,209</u>	<u>P 1,449</u>	<u>P 2,857</u>	<u>P 1,820</u>	<u>P 1,433</u>

Consequently, deferred tax liabilities were also not recognized on certain taxable temporary differences as the settlement of those can be offset by the available deductible temporary differences in the future.

In addition, deferred tax liabilities on accumulated translation adjustments, relating to its foreign subsidiaries were not recognized since their reversal can be controlled, and it is probable that the temporary difference will not reverse in the foreseeable future.

The details of the Group's NOLCO, which can be claimed as deduction from future taxable income within three years from the year the taxable loss was incurred and within five years from the year SPC losses were incurred, is shown below.

<u>Inception Year</u>	<u>Amount</u>	<u>Utilized</u>	<u>Expired</u>	<u>Balance</u>	<u>Expiry Year</u>
2019	P 7	P -	P -	P 7	2022
2018	11	-	-	11	2021
2017	22	-	-	22	2020
2016	<u>8</u>	<u>-</u>	<u>8</u>	<u>-</u>	
	<b>P 48</b>	<b>P -</b>	<b>P 8</b>	<b>P 40</b>	

The breakdown of the Group's excess MCIT over RCIT with the corresponding validity periods follows:

<u>Inception Year</u>	<u>Amount</u>	<u>Utilized</u>	<u>Expired</u>	<u>Balance</u>	<u>Expiry Year</u>
2019	P 99	P -	P -	P 99	2022
2018	54	-	-	54	2021
2017	52	-	-	52	2020
2016	<u>2</u>	<u>-</u>	<u>2</u>	<u>-</u>	
	<b>P 207</b>	<b>P -</b>	<b>P 2</b>	<b>P 205</b>	

The breakdown of the Parent Company's excess MCIT over RCIT with the corresponding validity periods follows:

<u>Inception Year</u>	<u>Amount</u>	<u>Utilized</u>	<u>Expired</u>	<u>Balance</u>	<u>Expiry Year</u>
2019	P 19	P -	P -	P 19	2022
2018	53	-	-	53	2021
2017	52	-	-	52	2020
2016	<u>2</u>	<u>-</u>	<u>2</u>	<u>-</u>	
	<b>P 126</b>	<b>P -</b>	<b>P 2</b>	<b>P 124</b>	

The MCIT applied by the Group in 2017 solely pertains to the MCIT of the Parent Company as it has generated net taxable income and is liable for RCIT for that year.

### **26.2 Supplementary Information Required Under RR 15-2010**

The BIR issued RR 15-2010 on November 25, 2010 which require certain tax information to be disclosed as part of the notes to financial statements. Such supplementary information is, however, not a required part of the basic financial statements prepared in accordance with PFRS; it is neither a required disclosure under the SEC rules and regulations covering form and content of financial statements under the Revised Securities Regulation Code Rule 68.

The Parent Company presented this tax information required by the BIR as a supplemental schedule filed separately from the basic financial statements.

## **27. TRUST OPERATIONS**

Securities and properties (other than deposits) held by the Parent Company in fiduciary or agency capacity for its customers are not included in the financial statements, since these are not resources of the Parent Company.

The Group and Parent Company's total trust resources amounted to P94,432 and P87,639 as of December 31, 2019 and 2018, respectively (see Note 29.1).

Investment in government securities which are shown as part of Investment securities at amortized cost (see Note 10.3) with a total face value of P17,968 and P955 as of December 31, 2019 and 2018, respectively for both the Group and the Parent Company are deposited with the BSP as security for faithful compliance with fiduciary obligations.

## **28. RELATED PARTY TRANSACTIONS**

The Group and Parent Company's related parties include its ultimate parent company, subsidiaries, associates, entities under common ownership, key management personnel and others.

The Related Party Transactions (RPT) Committees, which meet monthly and as necessary, review proposed RPT within the materiality threshold to determine whether or not the transaction is on terms no less favorable to the Group than terms available to any unconnected third party under the same or similar circumstances. On favorable review, the RPT Committees endorse transactions to the BOD for approval.



**Parent Company**

	2019		2018		2017	
	Amount of Transaction	Outstanding Balance	Amount of Transaction	Outstanding Balance	Amount of Transaction	Outstanding Balance
					(As restated)	(As restated)
<b>Subsidiaries</b>						
Loans and receivable	(P) 986	P 13	P 999	P 999	(P) 222	P -
Deposit liabilities	40	442	( 41)	402	( 2,155)	443
Interest income from loans and receivable	-	-	7	-	-	-
Interest expense on deposits	1	-	5	-	6	-
Dividend	500	-	100	-	355	-
Rental income	40	-	200	-	191	-
Occupancy and equipment-related expenses	365	-	352	-	13	-
Service and processing fees	591	-	531	-	499	-
Sale of investment securities	126	-	35	-	175	-
Purchase of investment securities	3	-	3	-	5	-
Assignment of receivables	( 10)	172	( 10)	182	( 10)	192

**Associates**

Loans and receivables	617	617	-	-	-	-
Deposit liabilities	53	76	( 142)	23	154	165
Interest expense on deposits	2	-	6	-	3	-
Interest income from loans and receivables	2	-	-	-	-	-
Dividend	-	-	2	-	59	-

**Related Parties Under Common Ownership**

Loans and receivables	352	3,480	( 142)	3,128	3,270	3,270
Deposit liabilities	2,166	4,764	( 142)	2,598	2,584	2,740
Interest income from loans and receivables	191	-	194	-	190	-
Interest expense on deposits	56	-	28	-	8	-
Occupancy and equipment-related expenses	946	-	790	-	715	-
Miscellaneous expenses – others	225	-	78	-	67	-

**Parent Company**

	2019		2018		2017	
	Amount of Transaction	Outstanding Balance	Amount of Transaction	Outstanding Balance	Amount of Transaction	Outstanding Balance
					(As restated)	(As restated)
<b>Key Management Personnel</b>						
Loans and receivables	(P) 4	P -	(P) 24	P 4	P 27	P 28
Deposit liabilities	108	202	( 197)	94	43	291
Interest income from loans and receivables	-	-	1	-	2	-
Interest expense on deposits	6	-	1	-	3	-
Salaries and employee benefits	329	-	298	-	328	-
<b>Other Related Interests</b>						
Loans and receivables	( 749)	2,404	( 3,683)	3,153	2,295	6,836
Deposit liabilities	2,622	3,318	( 1,564)	696	2,145	2,260
Interest income from loans and receivables	159	-	182	-	560	-
Interest expense on deposits	96	-	26	-	16	-

### 28.1 Loans and Receivables

The summary of the Group and Parent Company's significant transactions and the related outstanding balances for loans and receivables with its related parties as of and for the years ended December 31, 2019, 2018 and 2017 are as follows:

Related Party Category	Group			
	Issuances	Repayments	Interest Income	Loans Outstanding
<b>2019:</b>				
Stockholders	P -	P 55	P 19	P 206
Associates	617	-	2	617
Related parties under common ownership	108	210	-	256
Key management personnel	-	-	1	13
Other related interests	676	1,112	159	2,717
	<b>P 1,401</b>	<b>P 1,377</b>	<b>P 181</b>	<b>P 3,809</b>
<b>2018:</b>				
Stockholders	P -	P 55	P 17	P 261
Related parties under common ownership	376	32	2	358
Key management personnel	9	207	1	13
Other related interests	2,480	9,433	182	3,153
	<b>P 2,865</b>	<b>P 9,727</b>	<b>P 202</b>	<b>P 3,785</b>
<b>2017:</b>				
Stockholders	P -	P 55	P 16	P 316
Related parties under common ownership	210	196	-	14
Key management personnel	691	481	2	211
Other related interests	8,267	2,702	560	10,106
	<b>P 9,168</b>	<b>P 3,434</b>	<b>P 578</b>	<b>P 10,647</b>
Related Party Category	Parent Company			
	Issuances	Repayments	Interest Income	Loans Outstanding
<b>2019:</b>				
Stockholders	P -	P 55	P 19	P 206
Subsidiaries	-	986	-	13
Associate	617	-	2	617
Related parties under common ownership	543	191	191	3,480
Key management personnel	-	4	-	-
Other related interests	317	1,066	159	2,404
	<b>P 1,477</b>	<b>P 2,302</b>	<b>P 371</b>	<b>P 6,720</b>
<b>2018 (As restated – see Note 34):</b>				
Stockholders	P -	P 55	P 17	P 261
Subsidiaries	1,000	1	7	999
Related parties under common ownership	-	142	194	3,128
Key management personnel	-	24	1	4
Other related interests	622	4,305	182	3,153
	<b>P 1,622</b>	<b>P 4,527</b>	<b>P 401</b>	<b>P 7,545</b>

Related Party Category	Parent Company			
	Issuances	Repayments	Interest Income	Loans Outstanding
2017 (As restated – see Note 34):				
Stockholders	P -	P 55	P 16	P 316
Subsidiaries	-	222	-	-
Related parties under common ownership	9,744	6,474	190	3,270
Key management personnel	494	467	2	28
Other related interests	4,997	2,702	560	6,836
	<b>P 15,235</b>	<b>P 9,920</b>	<b>P 768</b>	<b>P 10,450</b>

In the ordinary course of business, the Group has loan transactions with each other, their other affiliates, and with certain Directors, Officers, Stockholders and Related Interests (DOSRIs). Under existing policies of the Group, these loans are made substantially on the same terms as loans to other individuals and businesses of comparable risks.

Under the current BSP regulations, the amount of individual loans to a DOSRI, 70% of which must be secured, should not exceed the amount of the encumbered deposit and book value of the investment in the Group and Parent Company and/or any of its lending and nonbank financial subsidiaries. In the aggregate, loans to DOSRIs, generally, should not exceed the total equity or 15% of the total loan portfolio of the Group and Parent Company. However, non-risk loans are excluded in both individual and aggregate ceiling computation.

The following table shows the other information relating to the loans, other credit accommodations and guarantees granted to DOSRI as of December 31 as reported to the BSP:

	Group		Parent Company		
	2019	2018	2019	2018*	2017
Total outstanding					
DOSRI loans	<b>P 448</b>	P 500	<b>P 416</b>	P 469	P 509
Unsecured DOSRI	<b>106</b>	94	<b>96</b>	83	61
Past due DOSRI	<b>3</b>	2	<b>3</b>	2	1
Non-accruing DOSRI	<b>2</b>	2	<b>2</b>	2	1
Percent of DOSRI loans to total loan portfolio	<b>0.10%</b>	0.13%	<b>0.10%</b>	0.16%	0.19%
Percent of unsecured DOSRI loans to total DOSRI loans	<b>23.66%</b>	18.80%	<b>23.08%</b>	17.70%	11.98%
Percent of past due DOSRI Loans to total DOSRI	<b>0.62%</b>	0.49%	<b>0.67%</b>	0.52%	0.14%
Percent of non-accruing DOSRI loans to total DOSRI loans	<b>0.45%</b>	0.40%	<b>0.55%</b>	0.51%	0.14%

\*excludes exposure from a subsidiary

On January 31, 2007, BSP issued Circular No. 560, *Ceiling on Loans, Other Credit Accommodations and Guarantees Granted to Subsidiaries and Affiliates*, which provides the rules and regulations that govern loans, other credit accommodations and guarantees granted to subsidiaries and affiliates of banks and quasi-banks. Under the said circular, the total outstanding exposures to each of the Parent Company's subsidiaries and affiliates shall not exceed 10% of bank's net worth, the unsecured portion of which shall not exceed 5% of such net worth. Further, the total outstanding exposures to subsidiaries and affiliates shall not exceed 20% of the net worth of the lending bank.



As of December 31, 2019, 2018 and 2017, the Group and Parent Company is in compliance with these regulatory requirements.

As of December 31, 2019, 2018 and 2017, the Group recognized impairment loss on certain loans and receivables from DOSRI amounting to nil, P0.2 and P0.06, respectively, and is recognized as part of Impairment Losses account in the statements of profit or loss.

## 28.2 Deposit Liabilities

The summary of the Group and Parent Company's significant transactions and the related outstanding balances for deposit liabilities with its related parties as of and for the years ended December 31, 2019, 2018 and 2017 are as follows (see Note 17):

Related Party Category	Group			
	Deposits	Withdrawals	Interest Expense	Outstanding Balance
<b>2019:</b>				
Stockholders	P 4,465	P 3,721	P 15	P 801
Associates	20,445	20,264	2	316
Related parties under common ownership	140,566	140,385	61	3,888
Key management personnel	943	835	6	202
Other related interests	<u>120,371</u>	<u>118,465</u>	<u>96</u>	<u>2,968</u>
	<b>P 286,790</b>	<b>P 283,670</b>	<b>P 180</b>	<b>P 8,175</b>
<b>2018:</b>				
Stockholders	P 7,947	P 8,370	P 2	P 57
Associates	37,554	37,696	6	135
Related parties under common ownership	136,836	135,980	37	3,707
Key management personnel	539	731	1	94
Other related interests	<u>163,957</u>	<u>165,189</u>	<u>26</u>	<u>1,062</u>
	<b>P 346,833</b>	<b>P 347,966</b>	<b>P 72</b>	<b>P 5,055</b>
<b>2017:</b>				
Stockholders	P 25,106	P 25,857	P 5	P 480
Associates	32,335	32,069	3	277
Related parties under common ownership	14,007	11,312	9	2,851
Key management personnel	416	373	3	286
Other related interests	<u>213,907</u>	<u>211,728</u>	<u>16</u>	<u>2,294</u>
	<b>P 285,771</b>	<b>P 281,339</b>	<b>P 36</b>	<b>P 6,188</b>

Related Party Category	Parent Company			
	Deposits	Withdrawals	Interest Expense	Outstanding Balance
<b>2019:</b>				
Stockholders	P 4,465	P 3,721	P 15	P 959
Subsidiaries	124,353	124,313	1	442
Associates	20,277	20,224	2	76
Related parties under common ownership	142,381	140,215	56	4,764
Key management personnel	943	835	6	202
Other related interests	<u>121,087</u>	<u>118,465</u>	<u>96</u>	<u>3,318</u>
	<b>P 413,506</b>	<b>P 407,773</b>	<b>P 176</b>	<b>P 9,761</b>
<b>2018 (As restated – see Note 34):</b>				
Stockholders	P 7,947	P 8,212	P 2	P 215
Subsidiaries	91,988	92,029	5	402
Associates	37,554	37,696	6	23
Related parties under common ownership	135,752	135,894	28	2,598
Key management personnel	535	732	1	94
Other related interests	<u>163,957</u>	<u>165,521</u>	<u>26</u>	<u>696</u>
	<b>P 438,733</b>	<b>P 441,084</b>	<b>P 68</b>	<b>P 4,028</b>
<b>2017 (As restated – see Note 34):</b>				
Stockholders	P 25,106	P 25,699	P 5	P 480
Subsidiaries	100,523	102,678	6	443
Associates	32,223	32,069	3	165
Related parties under common ownership	9,058	6,474	8	2,740
Key management personnel	416	373	3	291
Other related interests	<u>136,192</u>	<u>134,047</u>	<u>16</u>	<u>2,260</u>
	<b>P 303,518</b>	<b>P 301,340</b>	<b>P 41</b>	<b>P 6,379</b>
<b>2019:</b>				
Stockholders	P 4,465	P 3,721	P 15	P 959
Subsidiaries	124,353	124,313	1	442
Associates	20,277	20,224	2	76
Related parties under common ownership	142,381	140,215	56	4,764
Key management personnel	943	835	6	202
Other related interests	<u>121,087</u>	<u>118,465</u>	<u>96</u>	<u>3,318</u>
	<b>P 413,506</b>	<b>P 407,773</b>	<b>P 176</b>	<b>P 9,761</b>

Related Party Category	Parent Company			
	Deposits	Withdrawals	Interest Expense	Outstanding Balance
2018 (As restated – see Note 34):				
Stockholders	P 7,947	P 8,212	P 2	P 215
Subsidiaries	91,988	92,029	5	402
Associates	37,554	37,696	6	23
Related parties under common ownership	135,752	135,894	28	2,598
Key management personnel	535	732	1	94
Other related interests	<u>163,957</u>	<u>165,521</u>	<u>26</u>	<u>696</u>
	<u>P 438,733</u>	<u>P 441,084</u>	<u>P 68</u>	<u>P 4,028</u>
2017 (As restated – see Note 34):				
Stockholders	P 25,106	P 25,699	P 5	P 480
Subsidiaries	100,523	102,678	6	443
Associates	32,223	32,069	3	165
Related parties under common ownership	9,058	6,474	8	2,740
Key management personnel	416	373	3	291
Other related interests	<u>136,192</u>	<u>134,047</u>	<u>16</u>	<u>2,260</u>
	<u>P 303,518</u>	<u>P 301,340</u>	<u>P 41</u>	<u>P 6,379</u>

Deposit liabilities transactions with related parties have similar terms with other counterparties.

### 28.3 Sale and Purchase of Securities

The Parent Company and certain subsidiaries engage in the trading of investment securities as counterparties to the transaction. These transactions are priced similar to transactions with other counterparties outside the Group and there are no unsettled transactions as of the end of each reporting period.

### 28.4 Retirement Fund

The Parent Company and certain subsidiaries' retirement funds covered under their defined benefit post-employment plan maintained for qualified employees are administered and managed by the Parent Company's Trust Department in accordance with the respective trust agreements covering the plan.

The retirement funds have transactions with the Group and Parent Company as of December 31, 2019, 2018 and 2017 as follows:

Nature of Transactions	Group		Parent Company	
	Net Amount of Transaction	Outstanding Balance	Net Amount of Transaction	Outstanding Balance
<b>2019:</b>				
Investment in common shares of Parent Company	(P 674)	P 1,193	(P 673)	P 1,190
Investments in corporate debt securities	273	324	209	311
Deposits with the Parent Company	( 41)	64	( 65)	40
Fair value losses	( 369)	-	( 375)	-
Interest income	23	-	18	-

Nature of Transactions	Group		Parent Company	
	Net Amount of Transaction	Outstanding Balance	Net Amount of Transaction	Outstanding Balance
2018 (As restated):				
Investment in common shares of Parent Company	(P 855)	P 1,867	(P 853)	P 1,863
Investments in corporate debt securities	49	86	102	346
Deposits with the Parent Company	( 276)	105	( 276)	105
Fair value losses	( 855)	-	( 849)	-
Interest income	5	-	3	-
2017 (As restated):				
Investment in common shares of Parent Company	(P 6)	P 3,123	(P 6)	P 3,123
Investments in corporate debt securities	( 49)	2	8	293
Deposits with the Parent Company	309	381	264	381
Fair value gains	1,272	-	1,254	-
Interest income	5	-	4	-

The carrying amount and the composition of the plan assets as of December 31, 2019, 2018 and 2017 are disclosed in Note 24.2. Investments in corporate debt securities include long-term negotiable certificates of deposit issued by the Parent Company.

The information on the Group and Parent Company's contributions to the retirement fund and benefit payments through the fund are disclosed in Note 24.2.

The retirement fund neither provides any guarantee or surety for any obligation of the Group nor its investments in its own shares of stock covered by any restriction and liens.

### 28.5 Other Related Party Transactions

#### (a) Lease Contracts with RRC and Sublease Agreement with Subsidiaries

The Parent Company and certain subsidiaries occupy several floors of RCBC Plaza as leaseholders of RRC [see Note 29.8(b)]. Rental expense incurred by the Group related to this lease arrangement is included as part of Occupancy and Equipment-related expenses account in the 2018 statement of profit or loss. The Parent Company's lease contract with RRC is effective until December 31, 2020.

The Parent Company entered into sublease agreements with certain subsidiaries which occupy several floors of RCBC Plaza. Rental income by Parent Company related to these sublease arrangements is included as part of Rentals under the Miscellaneous income account in the statements of profit or loss (see Notes 14.2). The outstanding receivable on the lease contracts, if any, is presented as part of Accounts receivable under Loans and Receivables account in the statements of financial position (see Note 11). The related outstanding receivable is unsecured, noninterest-bearing and payable in cash on demand. Management believes that the receivables on the sublease agreements are fully recoverable.

*(b) Service Agreement with RBSC*

The Parent Company has Service Agreement (the Agreement) with RBSC, wherein RBSC shall provide the Parent Company with marketing, distribution, technical, collection and selling assistance and processing services in connection with the operation of the Parent Company's credit card business. The total service processing fees incurred by the Parent Company is recognized as part of the Service and processing fees under the Miscellaneous Expenses account in the statements of profit or loss (see Note 25.2). The outstanding payable related to the service agreement is presented as part of Accounts payable under Other Liabilities account in the statements of financial position (see Note 22). The related outstanding payable is unsecured, noninterest-bearing and payable in cash on demand.

*(c) Key Management Personnel Compensation*

The breakdown of key management personnel compensation follows:

	<b>Group</b>		
	<u>2019</u>	<u>2018</u>	<u>2017</u>
Short-term employee benefits	<b>P 406</b>	P 619	P 442
Post-employment defined benefits	<u>12</u>	<u>18</u>	<u>16</u>
	<b><u>P 418</u></b>	<b><u>P 637</u></b>	<b><u>P 458</u></b>
	<b>Parent Company</b>		
	<u>2019</u>	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Short-term employee benefits	<b>P 329</b>	P 405	P 416
Post-employment defined benefits	<u>-</u>	<u>6</u>	<u>14</u>
	<b><u>P 329</u></b>	<b><u>P 411</u></b>	<b><u>P 430</u></b>

**29. COMMITMENTS AND CONTINGENCIES**

In the normal course of operations of the Group, there are various outstanding commitments and contingent liabilities such as guarantees, commitments to extend credit, tax assessments, claims from customers and third parties, etc., with amounts not reflected in the financial statements. Management does not anticipate losses from these transactions that will adversely affect the Group's operations.

In the opinion of management, the suits and claims arising from the normal course of operations of the Group that remain unsettled, if decided adversely, will not involve sums that would have material effect on the Group's financial position or operating results.

**29.1 Contingent Accounts, Guarantees and Other Commitments**

The following is a summary of contingencies and commitments arising from transactions not given recognition in the statement of financial position, expressed at their equivalent peso contractual amounts as of December 31, 2019 and 2018:

	<u>2019</u>	<u>2018</u>
Trust department accounts	P 94,432	P 87,639
Outstanding guarantees issued	67,003	49,553
Derivative assets	63,904	57,253
Derivative liabilities	59,505	53,261
Unused commercial letters of credit	20,688	19,231
Spot exchange sold	14,216	6,436
Spot exchange bought	14,210	6,330
Inward bills for collection	2,586	1,009
Late deposits/payments received	715	607
Outward bills for collection	38	614
Others	19	17

**29.2 Sale of National Steel Corporation (NSC) Plant Asset**

In October 2008, Global Steel Philippines (SPV-AMC), Inc. and Global Ispat Holdings (SPVAMC), Inc. (collectively, "Global Steel"), which purchased the Iligan Plant assets ("NSC Plant Assets") of the National Steel Corporation ("NSC") from the Liquidator (as defined in the Asset Purchase Agreement ("APA") dated September 1, 2004) in 2004, initiated arbitration proceedings with the Singapore International Arbitration Center ("SIAC") seeking damages on account of the failure of the Liquidator and the Secured Creditors (as also defined in the APA), including the Bank and RCBC Capital, to deliver the NSC Plant Assets free and clear from liens and encumbrance, purportedly depriving Global Steel of the opportunity to use the NSC Plant Assets to secure additional loans to fund the operations of the NSC Steel Mill Plant and upgrade the same.

On May 9, 2012, the SIAC Arbitral Tribunal rendered a partial award in favor of Global Steel in the amounts of (a) US\$80, as and by way of lost opportunity to make profits and (b) P1,403, representing the value of the undelivered billet shop land measuring 3.41 hectares. On appeal, and on July 31, 2014, the Singapore High Court set aside the partial award. On March 31, 2015, the Singapore Court of Appeals rendered a decision which affirmed the earlier decision of the Singapore High Court but held that the Liquidator and Secured Creditors are still required to deliver to Global Steel clean title to the NSC Plant Assets.

The Bank's total exposure in connection with the obligation to transfer clean title to the NSC Plant Assets to Global Steel is approximately P217 in terms of estimated property taxes and transfer costs due on the NSC Plant Assets, as a result of the Philippine Supreme Court's affirmation of the ruling that all pre-closing taxes on the NSC Plant Assets are deemed paid. On the other hand, the Bank has a receivable from Global Steel in the amount of P486. The Bank has fully provisioned the receivable, which is classified in the books of the Bank as UDSCL with zero net book value. The Bank's exposure, however, may be varied depending on whether the Iligan City's assessment of the post-closing taxes will be sustained as valid (including those imposed on non-operational machineries).

Notwithstanding the finality of the Philippine Supreme Court's ruling on the pre-closing taxes, on October 19, 2016, the City of Iligan foreclosed on NSC's properties after issuing a Notice of Delinquency against the NSC, seeking to collect the taxes covering the period 1999 to 2016. In an Order dated April 4, 2017, the Makati City Regional Trial Court ("Makati Trial Court") (a) nullified the public auction of the NSC Plant Assets, among others, (b) enjoined any and all real property tax collection actions against the NSC until the decision dated October 7, 2011, which held that the NSC pre-closing taxes have been paid, is fully executed and NSC's remaining tax liabilities are correctly computed. Likewise, in an Omnibus Order dated May 21, 2018, the Makati Trial Court denied the Motion for Reconsideration and the Urgent Motion to recall the Orders dated October 18, 2016 and April 4, 2017 filed by the Iligan City LGU and Iligan City Treasurer, among others.

The City of Iligan, filed with the Court of Appeals a Petition for Certiorari dated July 6, 2018, essentially (a) asserting the said LGU's right to sell at public auction the NSC Plant and other assets due to non-payment both pre-closing and post-closing taxes; and (b) praying that the writ of execution issued by the Makati Trial Court be declared null and void, especially due to the non-payment of docket fees and non-deposit of the contested tax amount of P4,610. In a Resolution dated December 18, 2018, the Court of Appeals dismissed the Petition filed by the City of Iligan on account of the LGU's failure to submit the documents/pleadings identified in an earlier Resolution dated July 31, 2018. The Court of Appeals likewise denied the City of Iligan's Motion for Reconsideration in its Resolution dated June 20, 2019, prompting the LGU to file a Petition for Review with the Supreme Court on September 6, 2019. In a Resolution dated October 16, 2019, the Supreme Court *motu proprio* granted the City of Iligan's Petition, and ordered the remand of the case to the Court of Appeals for the determination of the propriety of consolidating the same with CA-G.R. SP No. 1249852, or for resolution of the merits of the case.

### 29.3 *Verotel Merchant Services B.V. Case*

In 2011, Verotel Merchant Services B.V. ("VMS"), a Dutch corporation, and Verotel International Industries, Inc. ("VII"), a Philippine corporation, civilly sued the Bank, Bankard, Inc. ("Bankard"), Grupo Mercarse Corp., CNP Worldwide, Inc. and several individuals before the Los Angeles Superior Court for various causes of action including fraud, breach of contract and accounting, claiming that VII and its alleged parent company, VMS, failed to receive the total amount of US\$1.5, which the defendants allegedly misappropriated. VMS is an internet merchant providing online adult entertainment and online gambling, in addition to the sale of pharmaceuticals over the internet. Following an initial jury verdict in favor of VMS, and a series of subsequent motions and a reduction of monetary damages awarded to VMS, the Bank/Bankard filed their Notice of Appeal with the California Court of Appeals on July 11, 2016. On October 2, 2017, the Bank/Bankard filed their Revised Opening Brief on their appeal of the verdict with the California Court of Appeals. On March 28, 2018, the Bank/Bankard was advised of the filing of VMS's Combined Respondents' Brief and Cross-Appellants' Opening Brief. On August 14, 2018, the Bank/Bankard filed their combined Reply and Cross-Respondent's Brief. In accordance with prior stipulations, VMS timely filed its Final Reply Brief dated October 31, 2018.

In a letter dated May 30, 2019, VMS requested the California Court of Appeals to take cognizance of the ruling in *Mazik vs. Geico General Insurance Company*, claiming that it is relevant in resolving its punitive damages appeal. In a letter dated June 3, 2019, the Bank/ Bankard objected to the letter filed by VMS as it violates Rule 8.254 of the California Rules of Court, which prohibits the inclusion of "argument or other discussion of authority" and description of issued raised by a party in its brief. The parties are still awaiting the advice of the California Court of Appeals on the schedule date of the oral arguments.

### 29.4 *Applicability of RR 4-2011*

In March 2011, the Bureau of Internal Revenue ("BIR") (a) issued RR 4-2011, prescribing a new way of reporting income solely for banks and other financial institutions, and (b) issued assessment notices to banks and other financial institutions for deficiency income tax for alleged non-intra-unit allocation of costs and expenses to exempt income and income subjected to final tax within RBU.

On April 6, 2015, the Bank and other Bankers Association of the Philippines (BAP) member banks ("BAP-member banks") filed a Petition for Declaratory Relief with application for provisional remedies with the Makati Trial Court, assailing the validity of RR 4-2011 for (a) being violative of their substantive due process rights and the equal protection clause of the Constitution; (b) being a deterrent to banks to invest in capital market transactions to the prejudice of the economy; and (c) setting a dangerous precedent for the disallowance of full deductions, due to its prescribed method of allocation.

Acting on the Petition, the Makati Trial Court issued a Temporary Restraining Order on April 8, 2015 and a Writ of Preliminary Injunction on April 17, 2015, enjoining the enforcement, in any manner, of RR 4-2011 against the Bank and other BAP-member banks, including issuing any Preliminary Assessment Notice ("PAN") or Final Assessment Notice ("FAN") against them during the pendency of the litigation, unless sooner dissolved. On June 10, 2015, Makati Trial Court issued a Confirmatory Order stating that the BIR is also prohibited from ruling or deciding on any administrative matter pending before it in relation to RR 4-2011 and insofar as the Bank and other BAP-member banks are concerned.

After the pre-trial conference terminated on August 3, 2017, the Makati Trial Court directed the parties to file their respective Memorandum on September 15, 2017, in lieu of holding trials. In an Order dated May 25, 2018, the Makati Trial Court granted the Petition for Declaratory Relief and declared RR 4-2011 null and void for being issued beyond the authority of the Secretary of Finance and Commissioner of Internal Revenue. The Makati Trial Court likewise made permanent the Writ of Preliminary Injunction it issued earlier.

Aggrieved, the Department of Finance ("DOF") and the BIR elevated the matter to the Supreme Court via a Petition for Review on Certiorari dated August 1, 2018, essentially alleging that (a) the validity of RR 4-2011 should have been brought instead before the Court of Tax Appeal (CTA); (b) upon the issuance of RR 4-2011, the Bank and BAP-member banks should have already adjusted their accounting and book keeping methods; and (c) the declaratory relief action was no longer proper in view of the issuance of PANs.

In response/compliance with the Resolution dated March 27, 2019, the Bank and BAP member banks pointed out that (a) the Makati Trial Court case was proper since the issue relates to the exercise of quasi-legislative power; (b) Regional Trial Courts have original jurisdiction over Declaratory Relief actions arising from the issuance of invalid Revenue Regulations; (c) the Bank and BAP-member banks have not breached RR 4-2011; and (d) the Makati Trial Court correctly held that RR 4-2011 is invalid (i) for mandating banks and other financial institutions to adopt a different method of accounting from the other classes of taxpayers, in denigration of the equal protection clause of the 1987 Philippine Constitution, and (ii) unlawfully amending the NIRC or Tax Code, and depriving the Bank and BAP-member banks their substantive rights to fully deduct legitimate business expenses from their gross income. The case remains pending before the Supreme Court.

### **29.5 Alleged Unauthorized Transfer of Funds – Bank of Bangladesh**

In February 2016, four allegedly unauthorized fund transfers were wired to four accounts with the Bank from the Bangladesh Bank's account with the Federal Reserve Bank of New York ("FRBNY"), before being further dispersed to other accounts with other banks and casinos. In August 2016, the MB approved the imposition of a P1,000 fine upon the Bank which it paid in full ahead of the August 2017 deadline. Such fine was fully recognized as part of miscellaneous expenses in the Bank's 2016 AFS. While the Bank's payment of the penalty did not affect its ability to perform its existing obligations or unduly hamper its operations, there may still be other regulatory cases arising from these events.

#### **29.5.1 U.S. Litigation relating to the Bangladesh Bank Incident**

On January 31, 2019, Bangladesh Bank filed a complaint with the U.S. District Court Southern District of New York ("SDNY") against the Bank, some of its current/former officers who were involved in the incident, a money service business and its principals, junket operators, and the casinos where the questioned funds passed through, claiming the existence of a conspiracy with North Korean hackers to steal funds from its FRBNY bank account/laundry the same. The complaint cited nine (9) causes of action, including conversion, fraud and conspiracy, and sought the return of the full amount allegedly stolen, plus interest, attorney's fees, and other damages, including treble damages under the Federal Racketeer Influence and Corrupt Organizations ("RICO") Act.

The Bank sought the dismissal of the case on both procedural and substantive grounds, including (a) forum non conveniens; (b) the ineffectual service of summons upon it; (c) the lack of nexus with New York in view of the Bank's minimal contact therewith; and (d) failure of the Complainant to plead a legitimate basis for federal court jurisdiction. Thus, the Bank filed a pre-motion to dismiss letter on April 8, 2019, and the joint motion to dismiss letter on April 30, 2019, to which the Bangladesh Bank filed its response. An initial pre-trial conference was held by the U.S. District Court on May 21, 2019 where the judge decided to stay discovery pending the resolution of the motions to dismiss.

On June 14, 2019 (U.S. Time), the Bank/other co-defendants, filed (a) a joint motion to dismiss based on the lack of subject matter jurisdiction, and (b) another joint motion to dismiss based on forum non conveniens. In response, Bangladesh Bank filed its Memoranda of Law essentially claiming that (a) the February 2016 cyber-heist targeted Bangladesh Bank, the US and the FRBNY as part of an overreaching cyber-conspiracy that began in 2014 with the Sony Pictures hacking and continued until 2018; (b) the two-year continuity close-ended requirement does not exist, and it clearly pled the existence of conspiracy between the defendants; (c) proof that Philippine courts can handle complex cases/international discovery requests is lacking, and litigation costs in the Philippines are high; and (d) the availability of key witnesses/evidence are contingent on New York as venue of the litigation.

On August 1, 2019 (U.S. Time), the Bank/co-defendants filed their Reply Memoranda, asserting that Bangladesh Bank's RICO conspiracy claim is fatally deficient given its failure to (a) plead the time-bound existence of a pattern in defendants' racketeering activities, not to mention the lack of any ongoing criminal activity; and (b) prove that the defendants took part in the criminal enterprise's affairs beyond their respective businesses (i.e., the casinos).

Also, money outflowed from New York to the Philippines, thus the more relevant witnesses/evidence are in the country, and Bangladesh Bank's US\$30,000 reserves is more than sufficient for any litigation in the Philippines where the legal fees are less. Moreover, Bangladesh Bank's earlier recovery of the amount of US\$15 proves the adequacy of Philippine courts, and the Philippine Blocking Statute/ non-ratification to the Hague Convention will make it burdensome/impossible for relevant documents/witnesses to be produced or appear in New York.

On August 21, 2019 (U.S. Time), Bangladesh Bank requested for leave to file a Sur-Reply dated August 19, 2019, to address certain new issues allegedly raised by the defendants in their last pleadings, which the Presiding Judge granted with a note that Bangladesh Bank's Sur-Reply may or may not be considered in the resolution of the two joint motions to dismiss.

On November 22, 2019 (U.S. Time), the Bank/co-defendants filed their Notice of Supplemental Authority stating that (a) the U.S. District Court SDNY in the 28 U.S.C. §1782 petition denied Bangladesh Bank's Motion to vacate/quash the BNYM subpoena in its Order dated November 20, 2019; and (b) BNYM produced the requested documents on September 19, 2019, which have since been served upon the Bank, thus proving that discovery is readily available under 28 U.S.C. §1782.

On November 26, 2019 (U.S. Time), Bangladesh Bank filed its Notice of Supplemental Authority and Response to Defendants' Notice of Supplemental Authority, arguing that (a) the discovery process underscores the importance of evidence in the U.S.; (b) the Bank is attempting to obstruct justice/suppress discovery in the Philippines (citing pleadings filed in the money-laundering case filed against five current and former employees); and (c) the intention is to shift the venue away from New York to the Philippines where Bangladesh Bank has no presence/its claims will die, making the denial of the Bank/co-defendants' forum non conveniens motion imperative.

On August 23, 2019 (U.S. Time), but without prior leave, Bangladesh Bank tried to intervene in the case/vacate the aforesaid Order, claiming that (a) the target documents/testimonial evidence contain potentially confidential/personal information; (b) these relate to the Federal RICO Act case, where discovery was stayed; (c) setting aside the propriety of its intervention, it has standing to question the discovery orders due to BNYM's failure to quash the subpoena; (d) the target evidence include those not germane to the Philippine Injunction and Damages case; and (e) the former NSD's petition violated the Local Rules requiring notification to the U.S. District Court SDNY Branch handling the Federal RICO Act case, and his subpoena application should be consolidated therewith. To cure its procedural misstep, the counsel for Bangladesh Bank formally sought to stay the enforcement of the subpoena on BNYM, claiming that it is the ultimate target of such discovery proceedings.

In response, the counsel for the former NSD underscored (a) BNYM's lack of objection to the discovery process; (b) Bangladesh Bank's own violation of the U.S. District Court SDNY's Individual Rules and Local Rules; (c) Bangladesh Bank's lack of standing to assail the application in issue; (d) the former NSD's compliance with the notification requirement to Bangladesh Bank's local counsel in the Philippines; and (e) the independent nature of the former NSD's Petition vis-à-vis the Federal RICO Act case. On August 30, 2019 (U.S. Time), the former NSD formally filed his Memorandum of Law in Opposition to Bangladesh Bank's Motion to Vacate Order and Take Discovery Under 28 U.S.C. §1782 and To Quash Subpoena Under FRCP 45, reiterating his arguments on the propriety of the subpoena upon BNYM, and his compliance with the requirements of 28 U.S.C. §1782.

As indicated above, on November 20, 2019 (U.S. Time), the U.S. District Court SDNY denied Bangladesh Bank's Motion to vacate/quash the previous Order dated August 9, 2019, even as it allowed Bangladesh Bank's intervention in the proceedings, thereby sustaining the former NSD's claim on (a) his compliance with the notification requirement to the U.S. District Court SDNY Branch handling the Federal RICO Act case vis-à-vis Bangladesh Bank's Philippine counsel in the Injunction and Damages case; (b) the lack of relation between the cases (grounded on the existence of an alleged conspiracy to steal/laundry the funds of Bangladesh Bank, and the alleged defamatory statements made after the incident); and (c) Bangladesh Bank's failure to prove how BNYM's compliance with the subpoena will conflict with the rulings to be issued in the Federal RICO Act case.

### 29.5.2 Philippine Litigation relating to the Bangladesh Bank Incident

On March 6, 2019, the Bank/the former NSD filed a complaint for Injunction and Damages against the Bangladesh Bank with the Makati Trial Court to put a stop to the latter's repeated acts of (a) defaming, harassing and threatening the Bank/the former NSD, and (b) making it appear that they were involved in the theft of the US\$81 from its FRBNY bank account, and thus, obligated to pay/return the same. The Bank/former NSD posited that (a) Bangladesh Bank lost the US\$81 the minute the said funds were transferred from its FRBNY's bank account, and they had no participation therein; and (b) Bangladesh Bank has been making very public/outrageous claims that the Bank (and its officers, including the former NSD) allegedly conspired with North Korean hackers to steal the said funds/laundry the same, which repeated negative publicity is apparently designed to force the Bank to settle therewith.

In his Officer's Return dated March 14, 2019, the Sheriff of the Makati Trial Court reported that, on March 12, 2019, he tendered the Summons and a copy of the Complaint upon the Deputy Governor of Bangladesh Bank and Head of its Financial Intelligence Unit ("Deputy Governor"). On the other hand, Bangladesh Bank, via its Return of Summons and Manifestation by Special Appearance, disputed the propriety of the service of summons in the case. It likewise refused to formally submit to the jurisdiction of the Makati Trial Court and file any Answer, and did not send any representative during any of the mediation conferences held.

At the July 19, 2019 hearing, the Makati Trial Court issued an Order holding that (a) Bangladesh Bank's claim of immunity from suit cannot be sustained as its own Charter expressly states that it has the power to sue and be sued; (b) Bangladesh Bank was properly/validly served with summons through the Deputy Governor and the Head of Bangladesh Bank's Manila delegation; and (c) the filing of the complaint for Injunction and Damages, in relation to the case initiated by Bangladesh Bank in the U.S. District Court SDNY, cannot be considered forum shopping as none of the requirements for *litis pendencia*, save for identity of parties, are present. The Makati Trial Court has directed the Bangladesh Bank to file its Answer to the Complaint within fifteen (15) days from notice, and set a status hearing which has been further reset to 14 February 2020. Bangladesh Bank's motion for reconsideration of the July 19, 2019 Order, anchored on its claim of (a) non-waiver of its sovereign immunity; and (b) non-defamatory nature of the statements made by Bangladeshi officials, on the purported involvement of the Bank in money laundering, remains pending to date.

### 29.5.3 Specific Litigation Involving the Bank's Officers

Anent the criminal complaint for money laundering filed against former Business Manager Maia S. Deguito ("BM Deguito), the Anti-Money Laundering Council of the Philippines ("AMLC") filed with the Department of Justice ("DOJ") a second criminal complaint against six (6) current and former employees of the Bank for alleged violation of Section 4(f) of R.A. No. 9160, as amended, arising from their alleged performance or failure to perform an act, which purportedly facilitated the crime of money laundering of US\$81. Acting on the complaint, the DOJ found probable cause against five (5) of such current and former employees and filed the corresponding Information with the Makati Trial Court, which it subsequently amended.

After arraignment, Pre-Trial/Trial ensued with the Prosecution (a) concluding its prosecutorial action upon the filing of its Formal Offer of Evidence on October 18, 2019, and (b) making a tender of excluded evidence after a number thereof were held to be inadmissible. All the accused requested leave, and filed their Demurrer to Evidence, which were deemed submitted for resolution in the Order dated December 10, 2019. The Makati Trial Court likewise tentatively reset the presentation of Defense evidence to January 23, 2020, at 8:30 am.

Acting on the criminal complaints filed by the Bank and a client in connection with a series of unauthorized acts/transactions relating to the money laundering of US\$81, the Office of the City Prosecutor of Makati City found probable cause to charge former BM Deguito and former SCRO Torres with several counts of falsification of commercial document and perjury, respectively, before the Metropolitan Trial Court of Makati City ("Makati MTC").

Due to the death of Mr. William Go, the Prosecution in the falsification of commercial document cases signified its intention to present the bank teller who processed the questioned transactions. Pending its resolution, the Makati MTC cancelled the October 22, 2019 hearing and set additional hearings on January 28, 2020, March 10 and 31, 2020, and April 21 and 28, 2020, all at 8:30 am.

The Makati MTC hearing the perjury case rejected the attempt of former SCRO Torres to recall/ cross-examine a Prosecution witness, the non-appearance of her counsel at the scheduled hearing being inexcusable. At the close of the testimony of the Questioned Document Examiner on October 3, 2019, the Makati MTC set the case for further hearing on March 19, 2020 and April 2, 2020, both at 8:30 am.

The Bank has several petitions for review currently pending in relation to actions that it has initiated against former Bank employees in relation to the Bangladesh Bank incident. There are no known trends, demands, and commitments, events, or uncertainties that will have a material impact on the Bank's operational performance and ability to service obligations.

### 29.6 RCBC Securities Case

In December 2011, RSI initiated a criminal case for falsification against its former agent, Mary Grace V. Valbuena ("Valbuena"), arising from questionable transactions with her own personal clients. Since then, RSI has filed additional criminal and civil cases, including charges of violation of Batas Pambansa Blg. 22 ("BP 22"), against Valbuena. On November 17, 2016, the Metropolitan Trial Court of Makati City, Branch 66, convicted Valbuena of the crime of violation of BP 22. Valbuena's conviction has since then been sustained by the Trial Court of Makati, Branch 141, and the Court of Appeals in its Decision dated September 6, 2019, which (a) denied Valbuena's Petition for Review for lack of merit, and (b) directed Valbuena to pay RSI the amount of P7.2, except that interest on the said amount shall be at the rate of (i) 12% per annum from January 18, 2012 to June 30, 2013, and (ii) 6% per annum from July 1, 2013 until full satisfaction of the amount due.

In May 2012, the Capital Markets Integrity Corporation ("CMIC") conducted an investigation on the complaint filed by one of Valbuena's personal clients against RSI. After due proceedings, the CMIC issued Resolutions dated July 3, 2015 and July 21, 2015, dismissing the complaint filed by the said client and denying his Motion for Reconsideration, respectively. The aforesaid Resolutions have since become final and executory.

In a Complaint dated December 30, 2013, Cognatio Holdings, Inc. ("Cognatio") complained against RSI, its former Vice President for Operations/Chief Finance Officer, its former Compliance Officer and Valbuena with the Enforcement and Investor Protection Department of the Securities and Exchange Commission ("EIPD-SEC"). In an Order dated April 3, 2019, the SEC-EIPD (a) ruled that RSI violated the Securities Regulations Code, imposing thereon a monetary fine of P5, and (b) directed its submission of amended internal control procedures to (i) strengthen its Chinese Wall Policy, and (ii) validate transactions executed by its salesmen. On April 25, 2019, RSI manifested that notwithstanding its disagreement with such factual findings, it will comply with the latter's directives. RSI likewise proposed to immediately pay a reduced amount in full and complete settlement of the monetary fine. In an Order dated July 16, 2019, the SEC-EIPD accepted RSI's settlement offer of P2.5, sans any finding of fault or guilt on the latter's part. Further, on August 5, 2019, RSI submitted its Board-approved Amended Internal Protocols to the Markets and Securities and Regulation Department, in compliance with the directive of the SEC-EIPD.

In September 2014, Carlos S. Palanca IV ("Palanca") and Cognatio filed a complaint against RSI with the CMIC, even as Cognatio's foregoing complaint was still pending with the EIPD-SEC. In its decision letter dated December 4, 2014, the CMIC dismissed Cognatio's complaint on the ground of prescription and *res judicata*. However, this was reversed by the SEC en banc on appeal. Aggrieved, RSI elevated the matter to the Court of Appeals, which held that Cognatio committed willful and deliberate forum shopping. In a Resolution dated September 5, 2018, the Court of Appeals denied Cognatio's Motion for Reconsideration, which prompted their filing of a Petition for Review dated October 8, 2018 with the Supreme Court. On February 11, 2019, RSI filed its Comment to the Petition for Review, and Cognatio responded by filing, on March 25, 2019, a Motion for Leave to file Reply and their attached Reply. The case remains pending to date.



On February 22, 2013, another client filed a complaint against RSI with the Makati Trial Court, essentially praying for the return of his shares of stock and cash payments approximately valued at P103, which he claims to have turned over to Valbuena. On May 20, 2013, RSI sought the dismissal of the complaint citing non-payment of the correct filing fees and failure to state a case of action. After the Makati Trial Court denied the same, RSI elevated the matter to the Court of Appeals, which sustained RSI's position and ordered the dismissal of the complaint in its Decision dated October 9, 2014. However, acting on client's Petition for Review, the Supreme Court – in its Decision dated October 17, 2018 - reversed the Court of Appeals and held that client's immediate payment of the deficiency docket fees shows that he did not intentionally attempt to evade the payment of the correct filing fees, so as to merit the dismissal of his complaint. In a Resolution dated January 23, 2019, the Philippine Supreme Court denied RSI's Motion for Reconsideration, and ordered the Makati Trial Court to proceed with the hearing of the case until its termination.

The proceedings before the Makati Trial Court were suspended to give way to mediation on July 16, 2019. After the filing of the Pre-Trial Briefs on August 13-14, 2019, the parties underwent Judicial Dispute Resolution, which was terminated on October 29, 2019 after settlement failed. In an Order dated November 12, 2019, the Makati Trial Court Branch to where the case was re-raffled, set the same for pre-trial conference on December 13, 2019, and directed the filing of the Judicial Affidavit of the parties' respective witnesses. On the aforesaid date, client and his counsel failed to appear/submit the required Judicial Affidavits of his witnesses, resulting in the resetting of the pre-trial conference to January 15, 2020. The Makati Trial Court issued a warning to client that it will dismiss the case should he and his counsel fail to appear during the said hearing date.

### **29.7 HHIC-Philippines, Inc. Rehabilitation Proceedings**

On January 9, 2019, HHIC-Phil filed a petition for corporate rehabilitation ("Petition") under Republic Act No. 10142, *the Financial Rehabilitation and Insolvency Act of 2010* ("FRIA"), with the Regional Trial Court of Branch 72, Olongapo City (the "Rehabilitation Court"). On January 14, 2019, the Rehabilitation Court gave due course to the Petition and appointed a Rehabilitation Receiver, who was soon replaced by Atty. Rosario S. Bernaldo.

To the extent allowable under the FRIA, the Parent Company, together with the four (4) other creditor banks ("co-creditor banks") negotiated with HHIC-Phil and HHIC for a modified rehabilitation plan ("MRP"), wherein: (a) the Parent Company/co-creditor banks will assume all the costs of maintaining/operating the Subic Shipyard to essentially preserve the assets thereat; (b) the said assets (except for an identified few) would be dacioned to the Parent Company/co-creditor banks, thru a trustee, in proportion to their respective loans and in full settlement of such loans; and (c) the Trustee, subject to the Parent Company/co-creditor banks' instruction, will assign the transferred assets to a new company organized for such purpose, or to any third party buyer/designee or nominee of the Bank/co-creditor banks, which shall then assume all costs necessary to maintain or operate the transferred assets.

On March 8, 2019, the Bank/co-creditor banks, HHIC-Phil and HHIC filed a Verified Joint Motion for Approval of Modified Rehabilitation Plan as a Pre-Negotiated Rehabilitation Plan Under Chapter III of the Financial Rehabilitation and Insolvency Act. However, the call for the approval of the MRP was deferred to address the issues raised in the Rehabilitation Court's Order dated April 12, 2019. On May 6, 2019, the Notice of Conference and the Modified Rehabilitation Plan of HHIC-Phil Inc. with Clarifications ("MRP with Clarifications") were electronically served upon all the known creditors and stakeholders, stating that the same will be submitted for their consideration on May 9, 2019. During the May 9, 2019 conference, more than fifty percent (50%) of the secured/unsecured creditors and stakeholders approved the MRP with Clarifications, which was reported to the Rehabilitation Court through a Manifestation dated May 14, 2019.

However, on June 14, 2019, the Rehabilitation Receiver filed a Motion dated June 13, 2019: (a) seeking further supporting details on certain items in the MRP with Clarifications from the Bank/co-creditor banks; and (b) praying that (i) all HHIC-Phil creditors agree to a uniform debt reduction/waiver of interest and penalties, (ii) the Parent Company/co-creditor banks be made to infuse working capital funds to HHIC-Phil in the meantime, and collectively limit their claim to USD350 should HHIC-Phil's assets be instead sold to a white knight, and (iii) the excess of such payment be used to paying all other creditors in proportion to their remaining exposures. The Parent Company/co-creditor banks opposed the Rehabilitation Receiver's Motion: (a) given their assumption of the cost of maintaining the shipyard; (b) requiring the infusion of additional working capital to HHIC-Phil when its account is past due may result in stiff penalties from its various financial regulators; and (c) the viability of the MRP with Clarifications arising from the waiver of the USD1,041 claims of the HHIC affiliates and HHIC-Phil's adoption of a new payment scheme, lessening its reliance on loans to finance its projects.

In the Order dated August 8, 2019, the Rehabilitation Court found the MRP with Clarifications to be still deficient and remanded the same for revision, and ordered the Parent Company/co-creditor banks make a complete and full disclosure of all transactions/submit all contract, agreements, waivers and other pertinent documents entered with foreign banks and other parties to the proceedings. On September 2, 2019, the Parent Company filed its Manifestation with Motion for Additional Time to Comply, disclosing the existence of a non-binding offer from a potential white knight, and praying that the Rehabilitation Receiver be given time to submit a further revised Rehabilitation Plan. On the other hand, two of the co-creditor banks filed an Omnibus Motion arguing that the MRP with Clarifications would (a) relieve HHIC-Phil of its USD7.2/a year bill for shipyard maintenance cost, (b) condone a huge portion of HHIC-Phil's debt, and (c) leave HHIC-Phil with more than sufficient operational funds during the remaining rehabilitation period, and that the FRIA does not prohibit a change in HHIC-Phil's line of business.

On September 11, 2019, HHIC-Phil filed its own Motion for Reconsideration of the Order dated August 8, 2019, arguing that the non-approval of the MRP with Clarifications will force it into liquidation. On the same date, another co-creditor bank requested for an extension of the date of submission of a further revised Rehabilitation Plan, and argued that no unjust enrichment of the Parent Company/co-creditor banks will actually occur. During the hearing on September 20, 2019, the Rehabilitation Court directed, among others, the setting of a monitoring hearing on November 5, 2019. On September 25, 2019, another co-creditor bank filed its Comment to HHIC-Phil's Motion for Reconsideration, stating that (a) although HHIC-Phil's business is not confined to building ships, it will continue with the completion of the four (4) ships mentioned in the MRP with Clarifications, and (b) the transfer of shipyard to the Bank/co-creditor banks will preserve and maximize the value thereof.

On 5 November 2019, the Rehabilitation Court issued an Order reconsidering the Order dated August 8, 2019 confirming the MRP with Clarifications. Not long after, a number of creditors (principally ship-owners with warranty claims/manufacturers of ship parts/engines) filed various motions for admission/clarification/correction of amount/reclassification of claims, as found in the Final Registry of Claims, praying that the Rehabilitation Court recall/vacate the Order confirming the MRP with Clarifications. The Parent Company/co-creditor banks filed their oppositions thereto pointing out that (a) these claims were already considered in the Rehabilitation Receiver's Submission (On Disputed and Challenged Claims and Those with Pending Motions for Correction/Rectification) (the "Submission") filed on September 16, 2019; (b) the movants failed to appeal within the five (5) day-period from notice of such Submission; (c) the same has been approved via the Order dated November 11, 2019; and (d) under no circumstances can the ship-owners Omnibus Motion filed in November 2019, be considered as the appeal mentioned in Section 26, Rule 2 of the FRIA. As for the ship engines/parts supplier, respectively, the Parent Company/co-creditor banks posited that (a) the ship engines supplier did not classify its claim as an administrative expense when it filed the same on January 18, 2020, and neither did it comment on the MRP/MRP with Clarifications/co-creditor bank's Motion for Reconsideration on the Order dated August 8, 2019 despite several opportunities to do so; and (b) the period to question the Rehabilitation Receiver's decision on the disputed claims, or appeal the same, have lapsed.



The Korean Development Bank (“KDB”) likewise filed a Motion to enforce its lien on the HHIC-Phil account in its possession, which was opposed by the Rehabilitation Receiver/a co-creditor bank given that KDB’s claim is fully secured by the real properties of HHIC.

Except for the above-mentioned proceedings, the Bank is not aware of any suits and claims by or against it or its subsidiaries, which if decided adversely, would have a material effect on its financial position or operating results.

### 29.8 Lease Commitments

#### (a) Parent Company as a Lessor

The Parent Company has entered into various lease contracts related to RSB Corporate Center, an investment property held for rental, with lease terms ranging from one to five years and with monthly rent depending on market price with 5% escalation rate every year. Total rent income earned from these leases amounted to P235, P258, and P209 in 2019, 2018, and 2017, respectively, which are presented as part of Rental under the Miscellaneous Income account in the statements of profit or loss (see Note 25.1).

The Parent Company’s future minimum rental receivables under this non-cancellable operating lease arrangement are as follows:

	Parent Company		
	2019	2018 (As restated – see Note 34)	2017 (As restated – see Note 34)
Within one year	P 444	P 421	P 271
After one year but not more than five years	852	804	486
	<u>P 1,296</u>	<u>P 1,225</u>	<u>P 757</u>

#### (b) Group as Lessee

The Parent Company and certain subsidiaries lease some of the premises occupied by their respective head offices [see Note 28.5(a)] and branches/business centers for lease periods from one to 25 years. The Group’s rental expense related to these leases (included as part of Occupancy and Equipment-related expenses account in the 2018 statement of profit or loss) amounted to P192, P1,187, and P977 in 2019, 2018, and 2017, respectively. Most of the lease contracts contain renewal options, which give the Group the right to extend the lease on terms mutually agreed upon by the parties.

The future minimum rental payables under these non-cancellable operating leases are as follow:

	Group	Parent Company
2018 (As restated):		
Within one year	P 1,123	P 1,092
After one year but not more than five years	2,447	2,324
More than five years	962	933
	<u>P 4,532</u>	<u>P 4,349</u>
2017 (As restated – see Note 34):		
Within one year	P 811	P 673
After one year but not more than five years	2,640	2,375
More than five years	335	291
	<u>P 3,786</u>	<u>P 3,339</u>

### 30. EARNINGS PER SHARE

The following shows the Group’s profit and per share data used in the basic and diluted EPS computations for the three years presented:

	2019	2018	2017
Net profit	<u>P 5,387</u>	<u>P 4,320</u>	<u>P 4,308</u>
Weighted average number of outstanding common shares of stock	<u>1,936</u>	<u>1,646</u>	<u>1,400</u>
Basic and diluted EPS	<u>P 2.78</u>	<u>P 2.62</u>	<u>P 3.08</u>

The convertible preferred shares did not have a significant impact on the EPS for each of the periods presented. The Group and the Parent Company has no potential dilutive shares as of the end of each reporting period.

### 31. NOTES TO STATEMENTS OF CASH FLOWS

Significant non-cash transaction of the Group and the Parent Company includes the impact of PFRS 16 adoption as discussed in Notes 2, 13 and 22; additions of real properties, chattel properties and other assets through foreclosures, dacion in payment and repossessions as discussed in Notes 14.1 and 15.3.2; and, partial settlement of certain loan in exchange of equity securities as discussed in Note 15.3.1

Presented below is the reconciliation of the Group and Parent Company’s liabilities arising from financing activities, which includes both cash and non-cash changes.

	Bills Payable (see Note 18)		Bonds Payable (see Note 19)		Total Financing Activities	
	Group	Parent	Group	Parent	Group	Parent
Balance at January 1, 2019	P 56,001	P 48,759	P 53,090	P 53,090	P 109,091	P 101,849
Cash flow from financing activities:						
Availments	89,737	89,100	45,697	45,697	135,434	134,797
Payments/redemption	( 44,388)	( 44,177)	-	-	( 44,388)	( 44,177)
Non-cash financing activities:						
Foreign exchange gains (losses)	256	256	( 2,031)	( 2,031)	( 1,775)	( 1,775)
Amortization of premium	-	-	58	58	58	58
Balance at December 31, 2019	<u>P 101,606</u>	<u>P 93,938</u>	<u>P 96,814</u>	<u>P 96,814</u>	<u>P 198,420</u>	<u>P 190,752</u>
Balance at January 1, 2018	P 43,967	P 36,600	P 28,060	P 28,060	P 72,027	P 64,660
Cash flow from financing activities:						
Availments	44,522	42,769	23,520	23,520	68,042	66,289
Payments/redemption	( 32,790)	( 30,912)	-	-	( 32,790)	( 30,912)
Non-cash financing activities:						
Foreign exchange gains	302	302	1,489	1,489	1,791	1,791
Amortization of premium	-	-	21	21	21	21
Balance at December 31, 2018	<u>P 56,001</u>	<u>P 48,759</u>	<u>P 53,090</u>	<u>P 53,090</u>	<u>P 109,091</u>	<u>P 101,849</u>
Balance at January 1, 2017	P 37,643	P 31,712	P 41,595	P 41,595	P 79,238	P 73,307
Cash flow from financing activities:						
Availments	20,561	15,477	-	-	20,561	15,477
Payments/redemption	( 14,472)	( 10,788)	( 13,687)	( 13,687)	( 28,159)	( 24,475)
Non-cash financing activities:						
Foreign exchange gains	235	199	118	118	353	317
Amortization of premium	-	-	34	34	34	34
Balance at December 31, 2017	<u>P 43,967</u>	<u>P 36,600</u>	<u>P 28,060</u>	<u>P 28,060</u>	<u>P 72,027</u>	<u>P 64,660</u>

In 2019, the Group exercised its call option and fully redeemed its Tier 2 Notes amounting to P9,986 (see Note 20).

### 32. SELECTED FINANCIAL PERFORMANCE INDICATORS

The following basic indicators and ratios measure the financial performance of the Group and Parent Company:

	<b>Group</b>		
	<b>2019</b>	2018	2017
Return on average equity			
$\frac{\text{Net profit}}{\text{Average total equity}}$	<b>6.47%</b>	5.78%	6.72%
Return on average resources			
$\frac{\text{Net profit}}{\text{Average total resources}}$	<b>0.80%</b>	0.73%	0.82%
Net interest margin			
$\frac{\text{Net interest income}}{\text{Average interest earning resources}}$	<b>4.03%</b>	4.00%	4.25%
Profit margin			
$\frac{\text{Net profit}}{\text{Revenues}}$	<b>15.02%</b>	16.31%	17.15%
Debt-to-equity ratio			
$\frac{\text{Total liabilities}}{\text{Total equity}}$	<b>8.26</b>	6.94	7.27
Resources-to-equity ratio			
$\frac{\text{Total resources}}{\text{Total equity}}$	<b>9.26</b>	7.94	8.27
Interest rate coverage			
$\frac{\text{Earnings before interest and taxes}}{\text{Interest expense}}$	<b>1.44</b>	1.50	1.73
Current ratio			
$\frac{\text{Total current assets}}{\text{Total current liabilities}}$	<b>0.47</b>	0.48	0.47
Acid test ratio			
$\frac{\text{Quick assets}}{\text{Total current liabilities}}$	<b>0.28</b>	0.26	0.20
Solvency ratio			
$\frac{\text{Total liabilities}}{\text{Total assets}}$	<b>89.20%</b>	87.41%	87.90%

	<b>Parent Company</b>		
	<b>2019</b>	2018 (As restated)	2017 (As restated)
Return on average equity			
$\frac{\text{Net profit}}{\text{Average total equity}}$	<b>6.48%</b>	5.79%	6.76%
Return on average resources			
$\frac{\text{Net profit}}{\text{Average total resources}}$	<b>0.81%</b>	0.74%	0.83%
Net interest margin			
$\frac{\text{Net interest income}}{\text{Average interest earning resources}}$	<b>4.02%</b>	4.02%	4.33%
Profit margin			
$\frac{\text{Net profit}}{\text{Revenues}}$	<b>15.48%</b>	16.98%	17.94%
Debt-to-equity ratio			
$\frac{\text{Total liabilities}}{\text{Total equity}}$	<b>8.19</b>	6.85	7.16
Resources-to-equity ratio			
$\frac{\text{Total resources}}{\text{Total equity}}$	<b>9.19</b>	7.85	8.16
Interest rate coverage			
$\frac{\text{Earnings before interest and taxes}}{\text{Interest expense}}$	<b>1.44</b>	1.50	1.74
Current ratio			
$\frac{\text{Total current assets}}{\text{Total current liabilities}}$	<b>0.44</b>	0.48	0.43
Acid test ratio			
$\frac{\text{Quick assets}}{\text{Total current liabilities}}$	<b>0.28</b>	0.26	0.26
Solvency ratio			
$\frac{\text{Total liabilities}}{\text{Total assets}}$	<b>89.11%</b>	87.26%	87.75%

### 33. MATURITY ANALYSIS OF ASSETS AND LIABILITIES

The table below shows an analysis of assets and liabilities analyzed according to when they are expected to be recovered or settled:

	2019					
	Group			Parent Company		
	Within One Year	Beyond One Year	Total	Within One Year	Beyond One Year	Total
<b>Financial Assets</b>						
Cash and other cash items	P 16,907	P -	P 16,907	P 16,808	P -	P 16,808
Due from BSP	87,255	-	87,255	85,453	-	85,453
Due from other banks	18,818	-	18,818	18,468	-	18,468
Loans and receivables arising from reverse repurchase agreements	5,768	-	5,768	5,629	-	5,629
Interbank loans receivables	18,803	-	18,803	19,411	-	19,411
Financial assets at FVTPL	5,548	-	5,548	4,800	-	4,800
Financial assets at FVOCI - net	54,245	-	54,245	52,425	-	52,425
Investments at amortized cost - net	25,671	75,255	100,926	27,094	73,125	100,219
Loans and other receivables - net	100,606	329,810	430,416	97,667	325,015	422,682
Other resources - net	898	-	898	174	722	896
	<u>334,519</u>	<u>405,065</u>	<u>739,584</u>	<u>327,929</u>	<u>398,862</u>	<u>726,791</u>
<b>Non Financial Assets</b>						
Investment in subsidiaries and associates - net	P -	P 444	P 444	P -	P 7,724	P 7,724
Bank premises, furnitures, fixtures and equipment - net	-	11,059	11,059	-	9,071	9,071
Investment properties - net	-	4,142	4,142	-	4,017	4,017
Deferred tax asset-net	-	2,140	2,140	-	1,888	1,888
Intangible and other resources - net	1,776	7,934	9,710	1,776	6,851	8,627
	<u>1,776</u>	<u>25,719</u>	<u>27,495</u>	<u>1,776</u>	<u>29,551</u>	<u>31,327</u>
	<b><u>P 336,295</u></b>	<b><u>P 430,784</u></b>	<b><u>P 767,079</u></b>	<b><u>P 329,705</u></b>	<b><u>P 428,413</u></b>	<b><u>P 758,118</u></b>
<b>Financial Liabilities</b>						
Deposit liabilities	P 82,976	P 373,605	P 456,581	P 78,461	P 378,132	P 456,593
Bills payable	75,139	26,467	101,606	74,530	19,408	93,938
Bonds payable	27,304	69,510	96,814	27,304	69,510	96,814
Accrued interest and other expenses	2,285	3,734	6,019	2,277	3,481	5,758
Other liabilities	1,460	15,891	17,351	1,460	15,093	16,553
	<u>189,164</u>	<u>489,207</u>	<u>678,371</u>	<u>184,032</u>	<u>485,624</u>	<u>669,656</u>
<b>Non Financial Liabilities</b>						
Accrued interest and other expenses	P 183	P -	P 183	P 140	P -	P 140
Other liabilities	293	5,382	5,675	283	5,277	5,560
	<u>476</u>	<u>5,382</u>	<u>5,858</u>	<u>423</u>	<u>5,277</u>	<u>5,700</u>
	<b><u>P 212,942</u></b>	<b><u>P 471,287</u></b>	<b><u>P 684,229</u></b>	<b><u>P 184,455</u></b>	<b><u>P 490,901</u></b>	<b><u>P 675,356</u></b>

	2018					
	Group			Parent Company (As Restated – see Note 34)		
	Within One Year	Beyond One Year	Total	Within One Year	Beyond One Year	Total
<b>Financial Assets</b>						
Cash and other cash items	P 17,392	P -	P 17,392	P 17,321	P -	P 17,321
Due from BSP	56,495	-	56,495	55,059	-	55,059
Due from other banks	20,342	-	20,342	19,815	-	19,815
Loans and receivables arising from reverse repurchase agreements	10,032	-	10,032	10,000	-	10,000
Interbank loans receivables	9,522	-	9,522	9,592	-	9,592
Financial assets at FVTPL	7,570	-	7,570	6,693	-	6,693
Financial assets at FVOCI - net	16,790	5,197	21,987	4,560	14,255	18,815
Investments at amortized cost - net	-	88,892	88,892	-	88,641	88,641
Loans and other receivables - net	89,096	299,682	388,778	101,395	281,173	382,568
Other resources - net	985	-	985	982	-	982
	<u>228,224</u>	<u>393,771</u>	<u>621,995</u>	<u>225,417</u>	<u>384,069</u>	<u>609,486</u>
<b>Non Financial Assets</b>						
Investment in subsidiaries and associates - net	P -	P 423	P 423	P -	P 7,012	P 7,012
Bank premises, furnitures, fixtures and equipment - net	-	8,415	8,415	-	6,681	6,681
Investment properties - net	-	3,631	3,631	-	3,505	3,505
Deferred tax asset-net	-	2,094	2,094	-	1,874	1,874
Intangible and other resources - net	931	7,106	8,037	671	6,978	7,649
	<u>931</u>	<u>21,669</u>	<u>22,600</u>	<u>671</u>	<u>26,050</u>	<u>26,721</u>
	<b><u>P 229,155</u></b>	<b><u>P 415,440</u></b>	<b><u>P 644,595</u></b>	<b><u>P 226,088</u></b>	<b><u>P 410,119</u></b>	<b><u>P 636,207</u></b>
<b>Financial Liabilities</b>						
Deposit liabilities	P 62,340	P 361,059	P 423,399	P 99,160	P 324,369	P 423,529
Bills payable	49,721	6,280	56,001	44,177	4,582	48,759
Bonds payable	-	53,090	53,090	-	53,090	53,090
Subordinated debt	-	9,986	9,986	-	9,986	9,986
Accrued interest and other expenses	2,068	2,916	4,984	2,063	2,771	4,834
Other liabilities	1,574	10,370	11,944	1,574	9,439	11,013
	<u>115,703</u>	<u>443,701</u>	<u>559,404</u>	<u>146,974</u>	<u>404,237</u>	<u>551,211</u>
<b>Non Financial Liabilities</b>						
Accrued interest and other expenses	P 293	P -	P 293	P 227	P -	P 227
Other liabilities	304	3,424	3,728	289	3,405	3,694
	<u>597</u>	<u>3,424</u>	<u>4,021</u>	<u>516</u>	<u>3,405</u>	<u>3,921</u>
	<b><u>P 116,300</u></b>	<b><u>P 447,125</u></b>	<b><u>P 563,425</u></b>	<b><u>P 147,490</u></b>	<b><u>P 407,642</u></b>	<b><u>P 555,132</u></b>

### 34. RESTATEMENT

The financial information in the Parent Company's financial statements are restated for the periods prior to the combination of the Parent Company and RSB to reflect the combination as if it had occurred at the beginning of the earliest period presented in the financial statements, which is accounted for using the pooling of interest method.

The following are the relevant analyses of the effects of the restatements on assets, liabilities and equity components of the Parent Company's financial statements:

The effects of the restatements on the assets, liabilities, and equity accounts are shown below.

	As of December 31, 2018			
	As Previously Reported	RSB Balances	Adjustments*	As Restated
<i>Change in resources and liabilities:</i>				
Cash and other items	P 12,225	P 5,107	( P 11 )	P 17,321
Due from BSP	39,847	15,213	( 1 )	55,059
Due from other banks	19,420	1,430	( 1,035 )	19,815
Loans arising from reverse repurchase agreements	4,000	6,000	-	10,000
Trading and investment securities	100,982	13,163	4	114,149
Loans and receivables	298,744	93,649	( 233 )	392,160
Investments in subsidiaries and associates	19,928	313	( 13,229 )	7,012
Bank premises, furniture, fixtures and equipment	4,922	1,018	671	6,681
Investment properties	2,922	1,446	( 863 )	3,505
Deferred tax assets	964	911	( 1 )	1,874
Other resources	6,899	1,520	212	8,631
Deposit liabilities	( 302,410 )	( 122,153 )	1,034	( 423,529 )
Bills payable	( 48,759 )	-	-	( 48,759 )
Bonds payable	( 53,090 )	-	-	( 53,090 )
Subordinated debt	( 9,986 )	-	-	( 9,986 )
Accrued interest, taxes and other expenses	( 3,966 )	( 1,177 )	82	( 5,061 )
Other liabilities	( 11,637 )	( 3,234 )	164	( 14,707 )
Net decrease in net resources			( P 13,206 )	

	As of January 1, 2018			
	As Previously Reported	RSB Balances	Adjustments*	As Restated
<i>Change in resources and liabilities:</i>				
Cash and other items	P 10,415	P 4,458	( P 12 )	P 14,861
Due from BSP	47,186	10,333	-	57,519
Due from other banks	18,368	2,154	( 1,053 )	19,469
Loans arising from reverse repurchase agreements	7,435	2,313	-	9,748
Trading and investment securities	58,133	11,507	-	69,640
Loans and receivables	265,791	82,206	166	348,163
Investments in subsidiaries and associates	19,018	206	( 12,020 )	7,204
Bank premises, furniture, fixtures and equipment	5,197	1,057	700	6,954
Investment properties	2,785	1,353	( 868 )	3,270
Deferred tax assets	942	829	-	1,771
Other resources	6,306	1,456	( 42 )	7,720
Deposit liabilities	( 288,667 )	( 101,685 )	1,222	( 389,130 )
Bills payable	( 36,600 )	-	-	( 36,600 )
Bonds payable	( 28,060 )	-	-	( 28,060 )
Subordinated debt	( 9,968 )	-	-	( 9,968 )
Accrued interest, taxes and other expenses	( 3,218 )	( 871 )	65	( 4,024 )
Other liabilities	( 8,134 )	( 3,336 )	138	( 11,608 )
Net decrease in net resources			( P 11,980 )	

\*Adjustments pertain to eliminating entries and reclassifications to conform with the Parent Company's presentation.

The following are the effects of the restatements on income and expenses account of the Parent Company:

	As of December 31, 2018			
	As Previously Reported	RSB Balances	Adjustments	As Restated
<i>Change in income and expenses:</i>				
Interest income	P 22,564	P 7,492	( P 12 )	P 30,044
Interest expense	( 7,533 )	( 2,567 )	10	( 10,090 )
Impairment losses	( 1,306 )	( 469 )	( 7 )	( 1,782 )
Other operating income	5,657	1,038	( 1,201 )	5,494
Other operating expenses	( 14,249 )	( 4,529 )	169	( 18,609 )
Tax income (expense)	( 813 )	76	-	( 737 )
Net decrease in net income			( P 1,041 )	

	As of January 1, 2018			
	As Previously Reported	RSB Balances	Adjustments*	As Restated
<i>Change in income and expenses:</i>				
Interest income	P 17,313	P 6,787	P 361	P 24,461
Interest expense	( 4,918 )	( 1,561 )	( 351 )	( 6,830 )
Impairment losses	( 1,164 )	( 793 )	( 1 )	( 1,958 )
Other operating income	6,887	1,012	( 1,515 )	6,384
Other operating expenses	( 13,113 )	( 4,064 )	156	( 17,021 )
Tax expense	( 697 )	( 31 )	-	( 728 )
Net decrease in net income			( P 1,350 )	

The effects of the prior period adjustments and reclassifications in the statements of cash flow are summarized as follows:

	As of December 31, 2018			
	As Previously Reported	RSB Balances	Adjustments*	As Restated
<i>Change in cash flows from operating activities:</i>				
Excess of revenues over expenses before taxes	P 5,133	P 965	( P 1,041 )	P 5,057
Adjustments for:				
Interest income	( 22,564 )	( 7,492 )	12	( 30,044 )
Interest received	21,261	7,356	( 617 )	28,000
Interest paid	( 8,131 )	( 2,216 )	846	( 9,501 )
Interest expense	7,533	2,567	( 10 )	10,090
Gain on sale of financial assets at amortized cost	-	-	69	69
Impairment losses – net	1,306	469	7	1,782
Depreciation and amortization	1,075	407	( 14 )	1,468
Dividend income	( 187 )	-	-	( 187 )
Share in net earnings of subsidiaries and associates	( 1,299 )	( 17 )	1,029	( 287 )
Recovery from written-off accounts	-	-	206	206
Gains on asset sold	( 28 )	( 22 )	22	( 28 )
Adjustments for:				
Decrease (increase) in financial assets at FVTPL	( 138 )	-	( 2 )	( 140 )
Decrease (increase) in financial assets at FVOCI	( 13,126 )	-	( 1,315 )	( 14,441 )
Decrease (increase) in loans and receivables	( 22,472 )	( 11,384 )	( 8,074 )	( 41,930 )
Decrease (increase) in investment properties	( 118 )	( 308 )	50	( 376 )
Decrease (increase) in other resources	1,036	( 88 )	1,586	2,534
Increase (decrease) in deposit liabilities	13,743	20,469	187	34,399
Increase (decrease) in accrued interest, taxes and other expenses	806	( 34 )	( 530 )	242
Increase (decrease) in other liabilities	274	( 57 )	4,220	4,437
Cash generated from (used in) operations	( 15,896 )	10,615	( 3,369 )	( 8,650 )
Income taxes paid	( 893 )	( 140 )	420	( 613 )
	( 16,789 )	10,475	( 2,949 )	( 9,263 )

\*Adjustments pertain to eliminating entries and reclassifications to conform with the Parent Company's presentation.

	As of December 31, 2018			
	As Previously Reported	RSB Balances	Adjustments*	As Restated
<i>Change in cash flows from investing activities:</i>				
Additional investments in securities at amortized cost	( 76,286 )	( 951 )	( 63,000 )	( 140,237 )
Proceeds from sale of investment securities at FVOCI	-	195	( 195 )	-
Acquisition of investment securities at FVOCI	-	( 3,463 )	3,463	-
Proceeds from disposal and maturity of securities at amortized cost	45,832	2,394	62,333	111,059
Acquisitions of bank premises, furniture, fixtures, and equipment	( 836 )	( 183 )	39	( 980 )
Cash dividends received	291	108	( 212 )	187
Acquisitions of intangible assets	( 163 )	( 15 )	22	( 156 )
Proceeds from disposals of bank premises, furniture, fixtures and equipment	<u>226</u>	<u>3</u>	<u>( 2 )</u>	<u>227</u>
	<u>( 30,936 )</u>	<u>( 1,912 )</u>	<u>2,948</u>	<u>( 29,900 )</u>
<i>Change in cash flows from financing activities:</i>				
Proceeds from availments of bills payable	42,769	34,200	( 34,200 )	42,769
Payments of bills payable	( 30,912 )	( 34,200 )	34,200	( 30,912 )
Issuance of bonds payable	23,520	-	-	23,520
Issuance of common stock	14,783	-	-	14,783
Dividends paid	( 863 )	-	-	( 863 )
Redemption of subordinated debt	-	-	18	18
	<u>49,297</u>	<u>-</u>	<u>18</u>	<u>49,315</u>
Cash and cash equivalents at the beginning of the year	<u>83,442</u>	<u>19,257</u>	<u>( 1,064 )</u>	<u>101,635</u>
Net effect on cash flows			<u>( P 1,047 )</u>	

	As of January 1, 2018			
	As Previously Reported	RSB Balances	Adjustments*	As Restated
<i>Change in cash flows from investing activities:</i>				
Additional investments in securities at amortized cost	( 27,549 )	( 5,810 )	-	( 33,359 )
Proceeds from disposal and maturity of securities at amortized cost	24,251	1,188	( 6,886 )	18,553
Acquisitions of bank premises, furniture, fixtures, and equipment	( 899 )	( 246 )	( 2,219 )	( 3,364 )
Cash dividends received	600	22	( 426 )	196
Acquisitions of intangible assets	( 267 )	( 74 )	-	( 341 )
Proceeds from disposals of bank premises, furniture, fixtures and equipment	<u>102</u>	<u>46</u>	<u>411</u>	<u>559</u>
	<u>( 3,762 )</u>	<u>( 4,874 )</u>	<u>( 9,120 )</u>	<u>( 17,756 )</u>
<i>Change in cash flows from financing activities:</i>				
Proceeds from availments of bills payable	15,477	820	( 820 )	15,477
Payments of bills payable	( 10,788 )	( 820 )	820	( 10,788 )
Dividends paid	( 773 )	-	-	( 773 )
Redemption of subordinated debt	-	-	16	16
Redemption of bonds payable	<u>( 13,687 )</u>	<u>-</u>	<u>-</u>	<u>( 13,687 )</u>
	<u>( 9,771 )</u>	<u>-</u>	<u>- 16</u>	<u>( 9,755 )</u>
Cash and cash equivalents at the beginning of the year	<u>91,426</u>	<u>23,812</u>	<u>( 23,812 )</u>	<u>91,426</u>
Net effect on cash flows			<u>( P 1,065 )</u>	

\*Adjustments pertain to eliminating entries and reclassifications to conform with the Parent Company's presentation.

	As of January 1, 2018			
	As Previously Reported	RSB Balances	Adjustments*	As Restated
<i>Change in cash flows from operating activities:</i>				
Excess of revenues over expenses before taxes	P 5,005	P 1,382	( P 1,351 )	P 5,036
Adjustments for:				
Interest income	( 17,313 )	( 6,787 )	( 361 )	( 24,461 )
Interest received	17,182	6,673	( 73 )	23,782
Interest paid	( 4,733 )	( 1,502 )	( 427 )	( 6,662 )
Interest expense	4,918	1,560	352	6,830
Impairment losses – net	1,164	793	1	1,958
Depreciation and amortization	1,085	483	( 13 )	1,555
Dividend income	( 196 )	-	-	( 196 )
Share in net earnings of subsidiaries and associates	( 2,110 )	( 72 )	1,349	( 833 )
Recoveries from written-off accounts	-	-	187	187
Gains on asset sold	( 199 )	( 90 )	256	( 33 )
Adjustments for:				
Decrease (increase) in financial assets at FVTPL	10,522	-	-	10,522
Decrease (increase) in financial assets at FVOCI	139	-	426	565
Decrease (increase) in loans and receivables	( 38,690 )	( 9,912 )	( 72,047 )	( 120,649 )
Decrease (increase) in investment properties	( 45 )	( 746 )	( 157 )	( 948 )
Decrease (increase) in other resources	139	1,043	7,381	8,563
Increase (decrease) in deposit liabilities	28,502	6,924	93,539	128,965
Increase (decrease) in accrued interest, taxes and other expenses	( 292 )	( 159 )	482	31
Increase (decrease) in other liabilities	<u>948</u>	<u>846</u>	<u>2,702</u>	<u>4,496</u>
Cash generated from (used in) operations	<u>6,026</u>	<u>436</u>	<u>32,246</u>	<u>38,708</u>
Income taxes paid	<u>( 477 )</u>	<u>( 116 )</u>	<u>( 395 )</u>	<u>( 988 )</u>
	<u>5,549</u>	<u>320</u>	<u>31,851</u>	<u>37,720</u>

Shareholders' Information

**CORPORATE INFORMATION**

Rizal Commercial Banking Corporation  
Yuchengco Tower, RCBC Plaza Tower 1  
Ayala Avenue, Makati City 1226 Philippines  
Tel: (+632) 8894-9000  
Website: [www.rcbc.com](http://www.rcbc.com)

**Annual Shareholders' Meeting**

Monday, July 27, 2020, 4:00 p.m.  
Virtually through <https://www.rcbc.com/ASM2020>

**Stock Listing**

Rizal Commercial Banking Corporation (RCBC) common shares are listed and traded at the Philippine Stock Exchange under the ticker symbol "RCB."

**Shareholders**

The number of common shareholders of record as of December 31, 2019 was 750.

**Major Shareholder**

Pan Malayan Management & Investment Corporation  
% of Stockholdings: 41.66%  
Nationality: Filipino

**Market Information**

Following are the high and low closing prices of the RCB shares as reported in the PSE for each quarter of the years ending in 2018 and 2019:

he Bank observes the following limits on exposures to related parties:

YEARS	QUARTERS	HIGHEST	LOWEST
2018	1 <sup>st</sup>	53.39	40.30
	2 <sup>nd</sup>	42.86	27.70
	3 <sup>rd</sup>	30.90	24.85
	4 <sup>th</sup>	29.30	25.40
2019	1 <sup>st</sup>	29.50	26.00
	2 <sup>nd</sup>	28.50	25.55
	3 <sup>rd</sup>	30.70	26.35
	4 <sup>th</sup>	27.00	22.10

Annual Report in SEC Form 17-A

The financial report included in this report follows the information contained in the Bank's SEC Form 17-A as required by and submitted to the Securities and Exchange Commission. Copies of this report may be obtained free of charge by downloading from the Philippine Stock Exchange and RCBC websites.

**SHAREHOLDER ASSISTANCE AND SERVICES**

**Investor Relations**

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Ayala Avenue, Makati City 1226 Philippines  
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Email: [Investor\\_Relations@rcbc.com](mailto:Investor_Relations@rcbc.com)

**Marketing Group**

PR and Corporate Communications Department  
Yuchengco Tower, RCBC Plaza Tower 1  
Ayala Avenue, Makati City 1226 Philippines  
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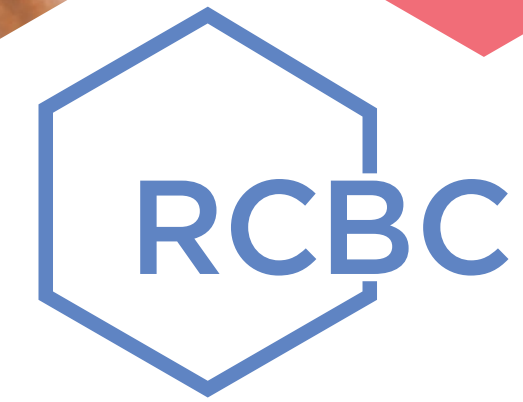
**Stockholder Services**

For inquiries regarding RCBC cash dividend payments for Common and Preferred Series shares and address updating:

RCBC Stock Transfer  
Yuchengco Tower, RCBC Plaza Tower 1  
Ayala Avenue, Makati City 1226 Philippines  
Tel: (+632) 8894-9000



▲ Scan QR CODE to download an electronic copy of this report, including Audited Financial Statements.



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