ICBC Standard Bank

CONSOLIDATED ANNUAL REPORT

FOR THE YEAR ENDED
31 DECEMBER 2023

ICBC Standard Bank Plc

AT A GLANCE

OVERVIEW

ICBC Standard Bank is a London-based banking specialist, focused on the provision of Commodities and Financial Markets solutions, to its global client base.

PURPOSE, VALUES AND STRATEGIC PRIORITIES

Our purpose statement

To serve our clients globally as the Commodities and Financial Markets hub of ICBC.

Underpinned by our values

Integrity 诚 信

Openness 开 放

Prudence 稳 健

Innovation 创 新

Excellence 卓 越

Our strategic priorities

- **Specialisation**: Deliver our strategic value to ICBC by enriching the global product offering
- **Integration**: Leverage ICBC global client base, infrastructure and balance sheet strength
- **Simplification**: Scale, build on our foundations and improve efficiency

OWNERSHIP STRUCTURE

ICBC → 19.4% → Standard Bank

World's largest bank by deposits, assets and Tier 1 capital

Pre-eminent Africa-focused financial services group

60% → ICBC Standard Bank ← 40%

CREDIT RATING - ICBC STANDARD BANK

	Short Term	Long Term	Outlook
Fitch	F1	A-	Stable
Moody's	P2	Baa1	Stable

GROUP PERFORMANCE 31 DECEMBER 2023

$608.2m	$187.1m	10.6%
Income after Credit Impairments	**Net Profit After Tax**	**Return on Equity**

$9.7bn	$23.2bn	18.5%
Total Risk Weighted Assets	**Balance Sheet Assets**	**Tier 1 Capital Adequacy Ratio**

OFFICES AND AVERAGE NUMBER OF EMPLOYEES

CHIEF EXECUTIVE'S REVIEW

Looking back on 2023 I am proud of the team at ICBCS, and their relentless focus to achieve our Purpose: To serve our clients globally as the Commodities and Financial Markets hub of ICBC

Once again, the team at ICBCS navigated challenging market conditions and delivered a 2023 performance which was well ahead of budget. Our FIC trading business led the way, highlighting the value of our diversified risk management capabilities within our chosen markets.

We delivered a profit of US$187.1 million in 2023, up 58.3% on adjusted net profit after tax in the prior year. This is the fourth consecutive year of over US$100.0 million pre-tax profit, with 2023 reflecting the strongest financial result on an adjusted basis, given the prior year result included US$233.7 million of recoveries on a commodity inventory intermediation transaction in relation to losses incurred in 2019. Equity attributable to ordinary shareholders continues to go from strength to strength, increasing by US$188.9 million in 2023 to a total of US$1,710.9 million.

This positive momentum further validates the continued focus on our guiding Strategic Principles:

Specialisation: Deliver our strategic value to ICBC by enriching the global product offering

Integration: Leverage ICBC's global network, client base, infrastructure and balance sheet strength

Simplification: Scale, build on our foundations and improve efficiency

We continue to add value to ICBC, our majority shareholder, through our complementary products and services. Our ICBC franchise linked revenues have grown year on year, once again validating the strategic rationale for ICBC's acquisition of our business. Being supported by the largest bank in the world also provides us with the capital and liquidity support required to weather the economic and geopolitical storms which have become a feature over recent years.

Our strong capital position allows us to make targeted investments in our core systems and infrastructure under the banner of our simplification agenda. We continue to invest in our Metals platforms in order to consolidate the applications, our E-Commerce platform in order to make our products more accessible to our clients, and our general underlying architecture and data management.

Sustainability

“ICBCS is committed to enabling our clients to pursue our shared goals of social and economic development, and environmental sustainability”. This sustainability vision highlights the balance we seek in partnership with our clients. We are of the view that an orderly energy transition requires a managed approach and recognise this remains a key priority for governments and organisations globally. With our deep Commodities expertise we are well placed to support our clients and are already playing a role in the financing of renewable energy. Our knowledge of Emerging Markets also allows us to support our clients in assessing the relevant risks and opportunities, and balancing the social and climatic impacts, of the respective economic development initiatives.

Outlook

Looking back on 2023 I am proud of the team at ICBCS, and their relentless focus to achieve our purpose: To serve our clients globally as the Commodities and Financial Markets hub of ICBC. Over recent years market volatility has become a permanent feature but it is something we are attuned to navigating. We expect the period ahead to remain challenging for the global economy, with higher interest rates for longer, geopolitical tensions and volatility across our core markets persisting in 2024. We are now well positioned to consistently deliver solid profitability due to our diverse portfolio of businesses, a strong yet conservative balance sheet, and a proven risk management culture. Although I am optimistic given our recent performance, we remain focused and maintain a cautious stance with respect to our financial resources. On behalf of Senior Management and the Board, I would like to thank ICBCS colleagues for their efforts, and our clients and shareholders for their ongoing support. I look forward to sharing further success in 2024.

Wenbin Wang
Chief Executive Officer

PUBLIC

Contents

1..Strategic report

The directors present their strategic report for the year ended 31 December 2023 for ICBC Standard Bank Plc ('ICBCS').

Who we are

ICBCS is a London-based banking specialist, focused on the provision of commodities and financial markets solutions, to its global client base. Industrial and Commercial Bank of China Limited ('ICBC') and Standard Bank Group Limited ('SBG'), hold 60% and 40% respectively of the issued share capital of ICBCS.

Within the UK, ICBCS is authorised by the Prudential Regulation Authority ('PRA'), and regulated by the Financial Conduct Authority ('FCA') and the PRA.

ICBC

ICBC was established on 1 January 1984 to undertake the business of industrial and commercial credit and savings previously handled by the People's Bank of China.

On 28 October 2005, ICBC was restructured into a joint-stock limited company. On 27 October 2006, ICBC was listed on both the Shanghai and Hong Kong stock exchanges and has developed into one of the largest listed banks in the world, possessing an excellent customer base, a diversified business structure, strong innovation capabilities and market competitiveness.

ICBC has a presence on six continents and its overseas network spans 49 countries and regions. ICBC provides a comprehensive suite of financial products and services to over 10 million corporate customers and 712 million personal customers through its various distribution channels. These consist of domestic institutions, overseas institutions and correspondent banks worldwide, as well as an e-banking network comprising a range of internet and telephone banking services and self-service banking centres.

Standard Bank

SBG is one of Africa's leading banking and financial services organisations. In 2007, SBG entered into a major strategic partnership with ICBC, with ICBC now being a 19.4% shareholder in SBG.

SBG operates in three key segments: Consumer and High Net Worth Clients, Business and Commercial Clients and Corporate and Investment Banking. These global client segments operate across South Africa, other African countries and selected international locations outside of Africa.

How we operate

Strategy

We specialise in global markets traded products including commodities, fixed income, and currencies, with a focus on emerging markets, notably frontier emerging markets. These span Asia, Africa, Central and Eastern Europe, the Middle East, and the Americas.

We also provide clients with specialised financing solutions that leverage our global markets capabilities.

We are headquartered in London, with additional operations in Singapore, New York and Shanghai.

We have access to major international financial exchanges including membership of the London Metals Exchange, and seats on the New York Mercantile Exchange (Comex division) and the Shanghai Gold Exchange International Board.

Our strategy is underpinned by three principles; specialisation, integration and simplification. We focus and invest where our business can add the most value; and are taking tangible steps towards integration by collaborating on business opportunities with ICBC.

Specialisation: *Deliver our strategic value to ICBC by enriching the global product offering*

- Provide global markets products to suit our clients' requirements;
- Deploy our resources and capital for maximum impact;
- Invest to maintain our competitive edge; and
- Provide ancillary and complementary services to ICBC's product offering.

Integration: *Leverage ICBC global client base, infrastructure and balance sheet strength*

- Collaborate with ICBC for coordinated client, product and operational strategies;
- Support ICBC to grow and diversify revenue streams; and
- Facilitate ICBC and SBG group level strategic cooperation.

Simplification: *Scale, build on our foundations and improve efficiency*

- Standardise processes and platforms to allow for greater volume;
- Remove internal inefficiencies and low value activity; and
- Migrate from remaining SBG services and platforms, integrating with ICBC where possible.

Business model

We offer an extensive spectrum of traded financial market and commodity assets, and related risk management products.

Our businesses originate exposures directly from clients and their market-making activities, which are subsequently risk managed and traded with other market participants and clients through the Group's distribution network.

Our Commodities business provides trading, sales, working capital solutions, and structured lending expertise through its Metals and Energy teams.

As one of the four members of London Precious Metals Clearing Limited, we offer vaulting and clearing services for clients, including safe custody for physical bullion at our own vault in London and at market recognised vaults globally.

Our Fixed Income and Currencies (FIC) business offers a comprehensive set of foreign exchange, interest rates, credit, money markets, and structured lending products. Our FIC business provides flow and structured products to our global clients for their investment activities, and delivers solutions for global corporates, banks and sovereigns for their financing, treasury and liability risk management requirements.

In recent years, generating diversified yet predictable revenue streams to build long term sustainability has become a key area of focus. This has predominantly been achieved through delivering structured lending capabilities for our clients. The structuring activities include lending against both liquid and illiquid collateral as well as derivatives financing (swaps) across both primary and secondary markets.

Purpose and Culture

Our purpose is to serve our clients globally as the commodities and financial markets hub of ICBC.

Our strategy and business model is enabled and supported by having a clear purpose and culture.

We are proud of our diverse workforce that represents a spectrum of cultures across multiple countries. We recognise the importance of having a vision, purpose, and set of values that provides all our employees with a common, shared direction.

Our culture framework actively monitors and measures emerging trends and the evolution of our culture. This framework combines trend analysis through measuring agreed quantitative metrics across six focus areas as well as deep dives into emerging trends and colleague survey feedback.

Our values represent the actions and way in which we expect our people to deliver our strategy. To further strengthen and embed the desired behaviours that underpin our work, we recently refreshed our Employee Value Proposition (EVP). Our EVP is the set of messages we use to bring the opportunities, employee experience and values at ICBCS to life. It helps us to attract the right potential candidates, retain strong talent, and forms part of the social contract we make with our people. It informs all aspects of the candidate and employee experience and by doing so, plays a leading role in fostering the culture we need to take our business forward. We continuously review and refresh our people policies and processes to ensure alignment with the EVP in support of delivering the Bank's strategy and objectives.

2023 in review

Operating environment

2023 saw another year of extreme volatility and an unpredictable operating environment, with new geopolitical risks

The global economy continued to recover slowly from the damage caused by the pandemic, Russia's war with Ukraine, and the cost-of-living crisis. Despite economic resilience early in 2023, growth remained slow and uneven, with increasing global divergences. In particular, the slowdown was more pronounced in advanced economies, than in emerging market and developing countries.

Within advanced economies, the US fared well, with resilient consumption and investment strengthening the case for the Federal Reserve to hold rates higher for longer, yet activities in the Euro area were revised downward.

Many emerging market economies also proved quite resilient in terms of GDP growth, although China faced persistent headwinds from its real estate crisis and weak market confidence. Other than the ongoing Russia-Ukraine war, the conflict between Hamas and Israel and other tensions in the Middle East add a new layer of geopolitical risk. Additionally, markets also saw an unprecedented sell-off in longer duration bonds, a crisis in the banking sector in early 2023, and tightening monetary policy across many central banks.

The global markets performance in 2023 was generally positive, with various regions experiencing growth in equity markets driven by strong corporate earnings, ongoing technology innovation and renewable energy. The S&P 500 generally performed well, reaching new highs at various points in the year, despite intermittent volatility stemming from inflationary concerns in the US and other global uncertainties. Overall, most major economies are in better shape than many forecasts predicted at the beginning of the year.

However, despite steady underlying economic growth in emerging markets, most regions have seen ongoing outflows from bond funds throughout the year due to limited risk appetite, resulting in a cumulative loss in allocations of US$50 billion since 2022. Overall, performance is negative across both hard and local currency emerging markets fixed income indices and emerging markets stocks. Similarly, as spreads and funding costs have risen, primary markets have become genuinely challenging, particularly in Europe, where new issue concessions and execution risk have risen sharply.

The energy sector has experienced notable volatility too, particularly in the third quarter of the year, given heightened geopolitical risks; for example, Brent oil prices surged to highs above US$95 pbbl in late September 2023 versus an average of US$82 pbbl for 2023. Volatility also spread to industrial metal prices, which nevertheless have been dragged down by persistent sluggishness from the China real estate slowdown, a hawkish Federal Reserve and ongoing geopolitical tensions. Gold on the other hand saw a steady rise of 12.2% and recorded its strongest ever finish to a year, closing above US$2,050 per ounce at the end of 2023 with further gains expected in 2024 on rate cut expectations in the first half of the year.

Outlook for 2024

The pivot of the Federal Reserve's rate stance and China's rebalancing act to reduce its reliance on real estate are two key themes that are expected to prevail beyond 2023. According to the International Monetary Fund's ('IMF') latest projections, global growth is projected at 3.1% in 2024 and 3.2% in 2025, remaining well below the historical average of 3.8%. Inflation is falling faster than expected in most regions. Global headline inflation is expected to fall from an estimated 6.8% in 2023 to 5.8% in 2024 and to 4.4% in 2025, while core inflation is also projected to decline to 4.5% in 2024. However, this is more likely to be a gradual process and most countries are unlikely to bring inflation down to targeted levels until 2025.

Overall, 2024 could still be a more challenging year for emerging markets and frontier emerging markets, with the upcoming US election and the market navigating between two potential scenarios; a 2024 recession with meaningful rate cuts, or the Federal Reserve holding rates higher for longer.

Global oil markets are expected to be fairly balanced, with a slight surplus next year as demand and non-OPEC supply growth exceed expectations. Yet in a scenario where conflicts in the Middle East disrupt oil supply, higher than expected oil prices would cause lower economic growth and higher inflation, increasing the likelihood that the Federal Reserve would hold rates higher for longer. It would therefore be dangerous to assume that tightening monetary policy would be abandoned if risk assets continue to perform well in the coming months. We are wary of the long end of the US dollar interest rate curve given the large amount of issuance still required to meet increased budget deficits into 2024.

How we measure strategic impact and value creation

We rely on a range of financial and non-financial measures to assess how well our strategy is creating value.

These measures include analysing our financial performance, our ability to deliver sustainable value and returns to our shareholders, our investment in maintaining a diverse and inclusive workforce, our contribution to broader society, and our environmental impact. Further details on these measures are set out on the following pages.

Key Performance Indicators

Business performance

Our results for the year are shown in the consolidated income statement, with the key performance indicators reflected below:

Financial KPIs

	2023	2022
Income after credit impairments[1]	**$608.2m**	$749.1m
Net profit after tax[1]	**$187.1m**	$317.1m
Total assets	**$23.2bn**	$22.6bn
Return on equity[2]	**10.6%**	21.3%
Total capital adequacy ratio	**21.1%**	20.2%

[1] Income after credit impairments in 2022 included recoveries on a commodity inventory intermediation transaction which totalled US$233.7 million, which after tax amounted to US$198.9 million

[2] Calculated from profit after tax and therefore includes the recoveries on the commodity inventory intermediation transaction in 2022

2023 saw our fourth consecutive year of over US$100.0 million of pre-tax profit which is a measure of the significant progress we have made to develop a financially resilient and sustainable business. This has been achieved throughout a challenging period that has required us to constantly adapt and manage our risks appropriately.

Commodities

The Commodities franchise delivered US$174.1 million in 2023 compared to US$203.5 million in the prior year, measured on a comparable basis. The 2022 result also included US$233.7 million of recoveries on the commodity inventory intermediation transaction in compensation for losses incurred in 2019, resulting in a total income after credit impairments of US$437.2 million.

Precious Metals Vaulting and Clearing volumes continued to grow, aided by ICBC collaboration

Our global Precious Metals franchise was the largest revenue driver. Overall revenue was marginally down on the prior year, although there were much less favourable market conditions in platinum group metals (PGMs) as prices fell and forward rates normalised to pre-Covid levels. Client flows and financing in gold and silver were robust and the vaulting and clearing footprint expanded as the business attracted new clients.

Base Metals performance was hampered by low inventory levels, with reduced client activity

Base Metals' origination efforts grew client derivatives flow trading, despite the macro-economic uncertainties. A focus on generating positive returns on credit lines also paid off and strides were made pivoting the client base towards high quality credit names. However, reduced demand for physical financing given the high interest rate environment acted as a drag on overall performance.

The Bank took further strategic steps towards digitising and simplifying its systems, and enhancing the client experience. We embedded the new Base Metals e-platform to efficiently drive transaction growth, and implemented a similar project in Precious Metals. There was progress on significant projects to consolidate and enhance risk management and downstream systems across Metals.

Energy strengthened the client franchise and the product offering developed in support of the energy transition

Energy continued with diversifying its client base and expanding its product offering, aided by development of Natural Gas, Liquefied Natural Gas (LNG) and Liquefied Petroleum Gas (LPG) product capabilities. These products also support the transition towards a lower carbon footprint, along with the increased focus on renewables which is a key growth pillar in support of the climate transition. As a result of this, Energy saw excellent performance in Structured Financing as renewed origination efforts resulted in a strong deal flow. This was balanced against a slowdown in client activity across physical and derivatives trading.

Fixed Income and Currencies

Income after credit impairments was US$361.8 million in 2023 compared to US$289.4 million in 2022. The 2023 result was supplemented by a US$44.9 million credit provision release as a result of a recovery on a Russian counterparty exposure which had been closed out in the prior year.

This result was achieved against a backdrop of increased stress and volatility in both emerging and developed markets.

The FX, Rates and Credit trading business was an important driver of FIC outperformance in 2023

The business successfully navigated the fallout from global inflation throughout the year which witnessed rapid interest rate rises by G7 central banks. This placed emerging market currencies, interest rates and credit under pressure leading to significant outflows from emerging market funds. Notably, in our core markets, Ghana suspended payments on its debt; Egypt was unable to maintain its “de facto” peg to the US Dollar; in Nigeria, the Naira weakened by over 35.0% as a result of the government easing currency controls and due to a shortage of US Dollars, and by the end of the year the gap between the official and parallel exchange rates had returned.

Client volumes were down in 2023, but this was compensated for by wider margins as a result of the increased volatility across our core markets. The business continues to invest in developing new frontier emerging markets where relevant to our shareholders, clients and our risk management expertise.

Structured Financing continues to expand and deepen the value of its client business, particularly sovereigns and state-owned enterprises (SoEs), which increasingly benefits the Emerging Markets trading franchise.

The outperformance of the FX, Rates and Credit business more than compensated for an understandably cautious risk approach to our Structured Financing business during 2023. Whilst this resulted in a marginal underperformance versus the prior year, the business managed the portfolio successfully, suffering no actual credit losses. During the year, and especially as markets began to stabilise, the business stepped up its origination and execution of transactions which will contribute to 2024 and beyond.

Although the Debt Capital Markets (DCM) business ended 2023 on budget, activity was restricted as the primary issuance market practically shutdown during the extended cycle of interest rate increases that persisted throughout the year. The expectation of interest rate rises in 2023 had led to a rush of issuance at the end of 2022 and the beginning of 2024 has also followed this trend, with a similar increase in issuance observed, as interest rate falls are now factored into market expectations.

Capital resources
At the end of the reporting period, our equity capital resources totalled US$1,870.9 million (2022: US$1,682.0 million), and total capital resources qualifying for prudential purposes amounted to US$2,039.1 million (2022: US$1,864.6 million).

We remain strongly capitalised at 31 December 2023, with a total capital adequacy ratio of 21.1% (2022: 20.2%), a tier 1 capital ratio of 18.5% (2022: 17.5%), a common equity tier 1 (CET1) ratio of 16.9% (2022: 15.7%) and risk weighted assets of US$9,653.2 million (2022: US$9,251.0 million). We maintain capital resources in excess of the minimum regulatory requirement.

Liquidity
Throughout 2023, the Bank maintained a liquidity surplus above the Individual Liquidity Guidance (ILG) requirements covering a regulatory stress period of 30 days, and the Bank's Internal Stress Test (IST) requirements, which covers the risk drivers over a 91-day survival horizon. The Bank had sufficient stable funding and was compliant with the regulatory Net Stable Funding Ratio (NSFR).

As at 31 December 2023 the Bank had the following liquidity and funding surpluses; ILG, US$2,217million (2022: US$2,130 million), constraining IST, US$2,749 million (2022: US$3,341 million) and NSFR, US$3,147 million (2022: US$4,447 million).

Under the regulatory Liquidity Coverage Ratio ('LCR'), we maintained liquidity in excess of the regulatory requirement. As at 31 December 2023, our LCR position was 183% (2022: 150%).

Credit rating
Our credit rating is premised on support from ICBC as parent, as well as consideration of our own capital and liquidity position, our corporate strategy, and future profitability.

Moody's and Fitch Ratings' long-term credit ratings as at 31 December 2023 remained unchanged at Baa1 and A- respectively, with stable outlooks.

Non-Financial and Sustainability Information Statement

Risk and Control
We take a prudent approach to risk management, with the Bank's risk appetite constrained to our financial resources. We operated within our Board approved risk appetite throughout 2023, following some turbulence in the previous year due to market volatility. During the year we have been working on refining our market risk economic capital methodology and expect to implement an update during 2024. Our principal risks are detailed in note 37, which also includes further information on relevant frameworks and policies.

Culture and Employee Engagement
Culture is important to us and the Group continues to measure, manage and monitor culture against a monitoring framework. This dashboard combines quantitative metrics (including an employee survey) and qualitative overlays. This allows management to track trends and focus their efforts.

Technology
During 2023, technology investment resulted in many improvements, including continued compliance with new and expanded regulatory regimes the Bank operates under, and further consolidation of our technology landscape. We completed the modernization of legacy and disparate end-user collaboration tools into the Microsoft Office 365 suite of products and services, providing a much-improved end-user experience and improved technology capabilities to enable the Global Markets business to offer new products. In addition, we continued with a number of multi-year initiatives in technology simplification, modernisation and business enablement.

Human rights
We are committed to respecting human rights, and operate in accordance with the Universal Declaration of Human Rights. We promote human rights across our organisation through our employment policies. The Board approved our annual Modern Slavery Statement.

Bribery and corruption
We require all employees to comply with the applicable anti-bribery and corruption laws in all jurisdictions in which we operate.

Financial crime and anti-money laundering
Our financial crime and anti-money laundering policies are designed to ensure that we comply with all necessary regulations and requirements. This includes having appropriate controls in place to mitigate the risk of financial crime.

Sustainability Review

ICBCS is committed to enabling our clients to pursue our shared goals of social and economic development, and environmental sustainability.

Our focus is balancing financial and holistic sustainability, while managing the complexities created from working within emerging markets and commodities; and meeting stakeholder expectations.

During 2023 we have continued to embed and develop our sustainability strategy. We understand the importance of considering our impact and recognise the need for sustainable practices that drive long term economic growth.

The directors have presented climate-related financial disclosures required by Section 414CA and 414CB of the Companies Act 2006, in the sustainability report, which follows this report.

Our Journey
Our strategy continues to evolve in support of the sustainability requirements of our stakeholders.

In 2020, with a focus on climate, we disclosed our first greenhouse gas emissions for the year ended 31 December 2020.

With the release of the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), we moved to a risk-based approach, with first disclosures in accordance with the TCFD framework in the year ended 31 December 2021.

In 2023, we pivoted to follow a business led approach, supported by the release of International Financial Reporting Standard's (IFRS) Sustainability Disclosure Standards S1 and S2. This enabled us to drive progress, clarify strategic direction and keep up with developing regulations. This resulted in our integrated and proportionate sustainability strategy.

While climate remains the key focus area of our disclosures in line with The Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022, we are working to assess other sustainability opportunities that are synergistic to our current business strategy as well as sustainability risks and the impact these could have on our business.

An integrated and proportionate sustainability strategy

To fulfil our Purpose...

Overall

To serve our clients globally as the Commodities and Financial Markets hub of ICBC

Sustainability

ICBCS is committed to enabling our clients to pursue our shared goals of social and economic development, and environmental sustainability

We must...

Maintain our **profitability** to build a sustainable business model

Manage our **exposures** prudently in consideration of current and future sustainability related risks

By...

Specialisation | **Integration** | **Simplification**

How...

Support client transition through sustainable opportunities whilst considering our risk appetite and economic returns

Commodities
Renewable structured finance deals

Lower carbon products

FIC
Continue our support of social and economic development of Emerging Markets

Underpinned by promoting, engaging and working in a responsible and sustainable way

- Work with counterparties and clients that are responsible and strive for longer term sustainability
- Engage industries we work in to help improve sustainability across the field
- Simplify and bring consistency to internal sustainability related processes and procedures

Through our people...

Commit to grow and maintain a **diverse, inclusive and sustainable organisation where our people thrive**

Supporting our local and franchise **communities**

Our people

Fostering Equality, Diversity and Inclusion

As a firm with global stakeholders, we celebrate our heritage, experiences and cultural diversity through our international workforce.

Our Equality, Diversity and Inclusion (ED&I) vision statement: "Be Yourself, Succeed Together" and our core value of Openness underpins our desire for a culture which is open and transparent and values difference, therefore enabling everyone to consistently achieve whilst being themselves.

We are committed to promoting an inclusive culture within the organisation and aim to ensure that all individuals can participate and "speak-up" to drive sustainable outcomes. We support this philosophy through structured feedback channels available to all employees, promoting a culture of openness.

Our ED&I strategy focuses on:

Transparency, Accountability and Reporting	• Report against Bank-wide goals through the Balanced Scorecard • Build out diversity data including ethnicity and a social mobility pilot • Continue to monitor Gender Pay Gap through regulatory submissions and internal assurance processes • Interpret regulatory reporting directives and embed in systems and reporting processes
Diverse Talent Acquisition, Retention and Development	• Consider diversity in all appointments whilst prioritising meritocracy • Invest in junior talent pipeline, delivering summer intern and graduate programmes • Continue to deliver the emerging leadership sponsorship (ELS) programme for women focused on advocacy, career coaching and personal impact training • Ensure the employee value proposition is authentic and delivers an integrated wellbeing strategy
Culture of Inclusion	• Continue our commitment through people management principles, policies, training and family benefits programme • Celebrate culture and diversity events • Foster external partnerships that facilitate greater awareness and perspective • Monitor and maintain staff morale through culture and engagement initiatives

Supporting Development and our Employee Value Proposition

Our Learning and Development Framework aligns to our values and behaviours with a key focus on how we upskill our people for the future and offer compelling learning opportunities for our employees.

Complimentary to our ED&I strategy, we ran our third consecutive emerging leader programme for women, a key pillar in a comprehensive leadership and management training curriculum offering formal programmes for all managers, directors and newly appointed managing directors.

In addition, the Bank recognises that professional qualifications can be important in developing the careers of employees and supports certification in common industry bodies such as the Chartered Institute for Securities and Investment (CISI), Chartered Financial Analyst Institute (CFA) and the International Compliance Association (ICA). We also support employees looking to study for a professional certification under the UK Government's Apprenticeship Scheme.

Regular mandatory training in regulatory standards supports our fitness and propriety certification and staff also have access to a digital library of 16,000+ courses covering a range of technical and soft skills training topics. Finally, we partner with external partners for upskilling in current business and sustainability topics and ran a series of CEO-sponsored master classes for senior executives in 2023 covering strategic leadership topics.

Attracting and Retaining Talent

Whilst we still see competition for key financial services and technology skills, 2023 saw talent acquisition markets settle for the first time post pandemic and the Bank saw voluntary turnover rates for staff reduce to a rolling average of 8.4% across each of the key locations we operate in. A refreshed set of employee value proposition messages has enabled a clear articulation of our offer and a reduction of time to hire rates. Equally, investments in retention strategies including support for hybrid working, a competitive employee benefits proposition, staff recognition processes, inflationary increases in underlying fixed pay rates and a pay for performance incentive strategy have all contributed positively to stability in our operating model.

Our Corporate Responsibility

Promoting Social Responsibility

Our Corporate Social Responsibility (CSR) commitment endeavours to create a corporate conscience that extends throughout our global footprint.

We have launched a dual-focus approach to our charity partnerships, with a Corporate Partnership managed out of London, alongside staff-elected charities in each of our regions. Fundraising proceeds are allocated across partnerships, spreading our impact across local communities and the wider societies in which we operate. We now have strategic partnerships with the Adopt-a-School Foundation in South Africa and regional partnerships with Shooting Star Children's Hospices in London, The Hope programme in New York and the Singapore Heart Foundation.

In 2023, we developed and implemented a Volunteering Policy for staff to commit a paid day of their time to a charity of their choice within policy and guidance.

Our participation in a Business Insights Programme is now in its fourth year and we will once again host a group of London scholars on a business project and leadership presentation.

Tax

We adopt a prudent approach in all tax matters, following the principles outlined in our publicly available Tax Strategy and adhering to HMRC's Code of Practice on Taxation for Banks. Our Tax Strategy is owned by the Board and reviewed annually.

We pay the required tax, and fulfil our filing obligations in accordance with local requirements, across all of the jurisdictions in which we operate. Our total tax contribution for 2023 was US$132.5 million (2022: US$134.0 million) of which US$67.0 million (2022: US$78.2 million) was borne by the Group with the remainder being primarily payroll taxes collected, by the Group, on behalf of our employees. The only exception is Singapore where employees self-assess and pay their own income taxes to the local authority.

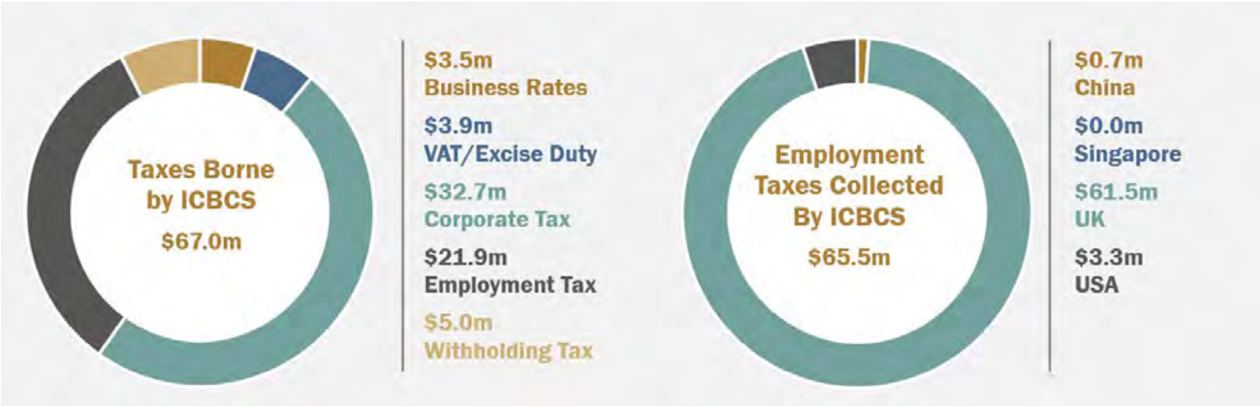
We are committed to:

- Accurate and timely tax compliance and tax risk management
- A principled approach towards legitimate and responsible tax planning
- A belief in open, transparent and honest tax authority engagement
- A resolve to co-operate fully with all anti-tax evasion and tax transparency initiatives

This approach is aligned with our values of Integrity, Openness, Prudence, Innovation and Excellence.

Our organisation has zero tolerance for tax evasion and will implement disciplinary procedures for any staff that do not uphold good practice in this area. We have successfully implemented a reporting regime for FATCA / CRS and a comprehensive control framework in respect of the UK Corporate Criminal Offence for failure to prevent facilitation of tax evasion. In order to help identify malpractice, we operate internally a confidential Whistleblowing policy, which includes all tax matters.

Principal governance of tax is through the Executive Committee feeding into the Board sub-committees and ultimately, to the Board of Directors.



Directors' statement on Companies Act 2006 Section 172

Directors have performed their duty to promote the success of the Company, including their engagement with stakeholders, and have taken account of the matters set out in section 172 (1) (a) to (f) of the Companies Act 2006.

Information on the work of the Board and Board Committees can be found in the Corporate Governance section in the Directors' Report. As noted in the Directors' report, the directors consider the likely consequences of their decision making in the long term and during the year the Board reviewed and determined its strategic priorities over a four-year time horizon, culminating in the approval of the Group's four-year business plan. The plan includes consideration of the capital and funding requirements of the Group (over the four-year planning horizon), in order to meet its strategic priorities. In approving the plan, the directors considered potential risks arising from the macro economy and business environment over the period. The Board has reviewed and supported the IT strategy, including the investment in a number of key IT projects for the metals business, to build additional capabilities and enhance resilience. This decision helps the business to remain competitive and well managed into the future.

The Board is committed to ensuring the Group maintains a reputation for high standards of business conduct, inclusive of those topics noted within the 'Non-Financial and Sustainability Information Statement' section above, which covers how the Bank considers human rights, bribery and corruption, anti-money laundering and financial crime matters. Additionally, the Board approved values and the Group's conduct and culture frameworks underpin the desire for maintaining high standards of business conduct.

The information on stakeholder engagement is presented below:

Stakeholder engagement

We believe it is important to consider a broad range of stakeholders when undertaking our day-to-day business to ensure the best outcomes for all parties.

There were no changes to the Board's group of stakeholders during the year. A summary of the Board's stakeholder oversight and engagement during the year is set out below.

Shareholders

Our relationship with shareholders is governed through a Shareholders' Agreement ('SHA'). The SHA is a key governance document that applies in conjunction with the articles of association and sets out specific matters that are reserved for shareholder decision. It covers which matters are reserved for Board decision and sets out other administrative procedures such as those governing the composition of the Board, shareholder appointed Board representatives, administration of Board meetings, preparation of the business plan and budget, capital requests, shareholder communications and other related matters.

Our ongoing shareholder engagement ensures that our strategy and annual business plan takes consideration of shareholder feedback and views on strategic direction, specifically ensuring that the services and products we will provide over the life of the business plan are complementary and enhancing to the capabilities of the wider ICBC Group. As part of our annual Board strategy day the directors specifically considered the product and geographical capabilities of the Bank to ensure appropriate alignment of the strategy to the objectives and capabilities of shareholders. In agreeing the Bank's strategy and risk appetite, the Board consider the views of our shareholders; examples included in our strategy are products which support strategic clients of ICBC and the ability to offer access products to certain African markets (which aligns to SBG's Africa focus).

The presence of a number of shareholder representative directors on the Board ensures that there is ongoing communication with, and input from, our shareholders at Board level on relevant matters. In addition, our Chief Executive keeps the Board updated on communications and developments with shareholders.

We engage with ICBC for support in areas where it has specific expertise, including in infrastructure and IT solutions.

During the year a number of our Independent Non-Executive Directors attended a corporate governance conference at ICBC's Head Office in Beijing, which provided a good opportunity to meet with senior shareholder colleagues and to share best practice across the ICBC Group.

Clients

The Board agrees that meeting the needs of clients is at the centre of what we do, and is committed to ensuring that we deliver the best solutions, services, and products.

Our progress on the automation and enhancement of electronic trading of our metals platform continues, with the intention to focus on building client self-service capabilities in the medium term. The Board IT Committee has been kept up to date on the delivery of these enhancements during the year.

As part of our strategic review, the Board continues to discuss how the Group can assist clients with the transition towards a cleaner and lower carbon future. The outcome of these Board discussions are incorporated in our four-year business plan, with strong support for metals which form a core component of electrification technologies and further growth of our Liquified Natural Gas ("LNG") capabilities as part of the energy business.

To enable us to achieve positive client outcomes, we have embedded extensive policies and procedures within our client management activities, which are supported by a dedicated Client Management Unit.

The focus on clients informs the compliance plan and compliance monitoring activities, which are regularly reviewed by the Board Risk Management Committee (BRMC). We have policies and procedures to support the right outcomes, which include client communications and disclosures, trade and order execution, suitability and appropriateness, conflicts of interest, client assets, data protection, information security and financial crime. Our counterparty risk management committee, which includes Executive Board Director members, is responsible for ensuring that we have appropriate controls in place to consider the acceptability, and retention, of client relationships, specifically, those that present heightened financial crime and reputational risks. The BRMC receives regular reports from the Head of Compliance in respect of all compliance matters and provides review and challenge of the policies and procedures in place.

As part of our commitment to ensure we maintain an appropriate level of continuity of service for our clients, the Board reviewed and approved the operational resilience self-assessment in line with regulatory requirements.

Regulators

The Board seeks to maintain an open and transparent dialogue with the regulatory authorities, both in the UK and our overseas jurisdictions. Regulatory considerations are integral to the Group's operations and the Board's discussions and decision making reflect this. The Chairman and Chief Executive have periodic meetings with UK regulators. Consideration is given to additional communications with regulators throughout the year when significant developments impacting the Group occur or are anticipated.

The Board proactively reviews key regulatory correspondence and acts to ensure that management address regulatory priorities and recommendations in a prompt and timely manner. In addition, there are various executive and non-executive director meetings held with the PRA throughout the year.

Executive management keep the Board apprised on the status and compliance with relevant regulations in the countries in which we operate. This includes updates and status with respect to current regulatory obligations, any material compliance incidents, future regulatory developments, and capital and liquidity positions.

Suppliers

Our approach to supplier management is designed to ensure fair and balanced relationships with suppliers.

During the year the Bank enhanced its framework for supplier management, including the management of associated risks. We engage with suppliers through a dedicated team who work with suppliers to ensure the Bank has all the necessary information, including through the use of supplier questionnaires, to appropriately manage the supplier relationships at inception and throughout the life of the service. The Board and Board Risk Management Committee have been updated on the improvements to the framework during the year, and have reviewed management information on suppliers during the year. Directors have provided guidance to management on potential areas for improvement and views on particular supplier relationships, which have been incorporated into management's decision making.

The outcome of the enhancements made to the supplier management framework have brought tangible benefits to both the Bank and suppliers. As the Bank has sought to uplift standards in line with both regulatory obligations and best practice, this has also built increased resilience in the control frameworks of suppliers who have aligned with these raised standards.

We continued to meet our obligations regarding responsible payment practices and reporting during the year, with the reports approved by our executive director for finance and operational oversight.

During the year the Board IT Committee requested management to review certain key supplier services and were updated on the outcomes.

Employees

The Board is responsible for setting the Group's culture and believes a diverse and engaged population will help to drive better outcomes for all stakeholders and achieve the ambitions of our business.

The directors are provided with regular updates on headcount, culture related measures, engagement initiatives (including outcomes and actions from employee surveys) and scorecard metrics in relation to our people including breaches and risks. In addition, a non-executive director is assigned with the role of overseeing Board level engagement with employees. This is an additional channel to ensure that employee considerations are factored into and discussed during Board meetings.

In terms of encouraging employee involvement in our performance there is a comprehensive performance management and assessment scheme, which ensures that performance is linked to remuneration. The Remuneration Committee reviewed the performance of the Bank and its functions during the year against a balanced scorecard of metrics and provided oversight of the related outcomes to employees to ensure that the outcomes were performance linked.

Following feedback from employees in respect of the impact that raised levels of inflation were having on the cost of living, the Remuneration Committee specifically considered the impact upon employees, and factored this into its annual review of fixed remuneration. The outcome of this decision was targeted action in the annual fixed remuneration review which recognised and aimed to address the varying impact of inflation for employees.

As part of our annual Board Strategy day we held a specific people strategy session focused on organisational design and opportunities for employee growth, supporting talent in the organisation, driving a learning culture and continuing actions to promote further diversity and inclusion. The outcome of these discussions was the support and approval of management's plans, which have been incorporated into the Human Resources People Plan for 2024. The plan seeks to support employees in their personal development and career growth, including investment in a number of learning and development programmes at differing levels of seniority, covering leadership, as well as professional and technical skills.

As part of our ongoing efforts to engage in direct feedback from staff a number of our independent non-executive directors have attended breakfast and lunch meetings during the year with a range of groups including recent graduate hires and staff participating in the Bank's Emerging Leaders Programme. These sessions provide opportunities for directors to gain additional perspectives which help to inform their decision making.

The Board and Remco continue to focus on gender diversity as well as broader diversity characteristics. It has been mandated that specific metrics are to be included in performance targets set for management and, during the year, the Board and Remco have monitored progress against representation goals as well as broader ED&I initiatives.

We have recently initiated an employee network to provide support for women in technology, operations and client management units, where the Bank seeks to improve its attractiveness to a wider demographic.

The Chief Executive held in-person and virtual staff town hall sessions and open dialogue chats during the year to update colleagues on key business developments, employee initiatives, and progress against our strategic priorities. The Bank also continued to provide regular, effective and meaningful communications through a variety of other channels.

The Bank is committed to providing employees with additional qualifications and seeking to employ people that may not consider financial services an accessible career by leveraging the apprenticeship scheme operated by the UK government.

We continue to run a summer internship programme in order to provide valuable experience for those considering a career in financial services.

Community

Our commitment to the community is affirmed in the Bank's corporate social responsibility framework and the Board continued to support our contribution to society. During the year we proactively participated in various community initiatives, including organising food and clothes drives, fundraising activities, donating meals, and contributing to local and national appeals. As noted in the 'Promoting Social Responsibility' section of this report, during 2023 we launched an employee volunteering leave initiative.

We have ongoing partnerships with charities in the UK, Singapore and New York. In the UK staff chose a new charity partner ‘Shooting Star Children’s Hospices’, a local regional charity which provides care for children with life-limiting conditions and support to their families. During the year there have been various employee fundraising initiatives to support these charity partnerships.

Another new initiative in 2023 was to support a school in South Africa through the ’Adopt a School Foundation’ programme and an initial donation was made for a specific in-school social welfare project.

How we manage risk

Overall responsibility for risk management rests with the Board of Directors which approves our Risk Appetite Statement. Day-to-day responsibility is delegated to the Executive Committee and other Board sub-committees, which review inter alia, summaries of market, liquidity, credit, country, operational, and regulatory risks.

Importantly, accountability for risk management resides at all levels across the organisation, as set out by our three lines of defence model, as further described in note 37.2.

Frameworks, policies, and procedures are in place to manage each major risk type. These set out minimum requirements for management of risk, and promote consistency of risk management methods.

Our principal risks are detailed in note 37.3. This is not an exhaustive list of all potential risks facing the Group, but rather those which management believes may have a significant impact on its business performance and future prospects.

Various external events such as the ongoing war in Ukraine, renewed conflict in the Middle East, energy supply issues and tightening of monetary policy by central banks in response to surging inflation, resulted in market disruption at various points throughout the year.

Looking ahead

Our business is in a strong position to build a sustainable future and deliver on our purpose.

2023 has seen us achieve our fourth consecutive year of strong profitability. Over that period, we have navigated volatile markets through prudent risk management, ensuring we continue to build a sustainable business over the long term. Our capital resources have steadily increased over the period. We remain committed to delivering our strategic priorities.

During 2024, we will continue to focus on fulfilling our purpose to serve our clients globally as the commodities and financial markets hub of ICBC. We will monitor and adapt our business strategy in response to changes in the macro-economic and geopolitical environment. We aim to further strengthen collaboration with ICBC, increase the provision of our core products to diversify our revenue streams, and continue to invest in our IT architecture in line with our strategic ambitions. We commit to making further progress in embedding our sustainability vision, and this will be a key consideration when undertaking new business. We remain focused on delivering value to our stakeholders.

The ICBC Standard Bank Plc Strategic Report 2023 was approved by the Board of Directors and signed on its behalf by the Chairman.

By order of the Board

A W Simmonds
Chairman

29 February 2024
20 Gresham Street
London EC2V 7JE

Public company limited by shares
Registered in England and Wales No. 2130447

2. Sustainability report

This report focuses on ICBCS's sustainability strategy and how we are managing sustainability-related risks and opportunities, with a focus on climate-related risks and opportunities in 2023. Its content is informed by the required disclosures of The Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022, coupled with consideration given to the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD) and International Sustainability Standards Board's (ISSB) International Financial Reporting Standard's (IFRS) Sustainability Disclosure Standards S1 and S2.

Regulatory Landscape

Governing Body	Regulation/Recommendation	Action
Task Force on Climate-related Financial Disclosures (TCFD):	TCFD Recommendations	The TCFD is a global organization formed to develop a set of recommended climate-related disclosures that companies and financial institutions can use to better inform investors, shareholders and the public of their climate-related financial risks The TCFD recommends climate-related disclosures related to governance, strategy, risk management and metrics and targets At COP28, the TCFD was officially disbanded, with the ISSB taking over the TCFD's responsibilities for corporate disclosure of climate targets, risks and opportunities
United Kingdom (UK) Legislation:	The Companies (Directors' Report) and Limited Liability Partnerships (Streamlined Energy and Carbon Report) Regulations 2018 (SECR) The Companies (Strategic Report) (Climate-related Financial Disclosure) Regulations 2022	SECR requires UK energy use disclosures in the form of Greenhouse Gas (GHG) Emissions for electricity consumption, gas combustions and fuel consumption The Companies Act requires non-financial disclosures in the strategic report to include sustainability disclosures with a focus on climate-related disclosures related to governance, risk management, strategy, resilience and metrics and targets The purpose of these disclosures is to help support investment decisions as we move towards a lower carbon economy
Prudential Regulation Authority (PRA):	PRA Supervisory Statement SS3/19 – Enhancing banks' and insurers' approaches to managing the financial risks from climate change	The PRA expects firms to develop and embed a strategic approach to managing the financial risks from climate change The PRA expects firms to consider engaging with the TCFD framework and other initiatives in developing their approach to climate-related financial disclosures
International Sustainability Standards Board (ISSB):	IFRS S1 – General requirements for disclosure of sustainability-related financial information IFRS S2 - Climate-related disclosures	The aim of the ISSB is to create a consistent global baseline and methodology for investor focused sustainability reporting that local jurisdictions can build upon The Standards bring together and will replace existing frameworks and standards, including the TCFD recommendations In June 2023 ISSB issued its first two sustainability reporting standards; S1 and S2. Further thematic reporting guidance will be issued over time The standards are yet to be formally adopted within UK regulation
Financial Conduct Authority (FCA):	Sustainability Disclosure Requirements (SDR)	Sustainability Disclosure Requirements (SDR) is the framework by which various standards become regulation. The FCA are currently consulting on ISSB, TPT and D&I standards to determine how they will incorporate them into SDR The FCA intend to release SDR standards by July 2024

Governing Body	Regulation/Recommendation	Action
Transition Plan Taskforce (TPT):	Disclosure Framework	The Transition Plan Taskforce (TPT) was created to develop a 'gold standard' transition plan framework and guidance building on ISSB and TCFD Aiming to enable robust, consistent and action orientated transition plans as well as informed recommendations for UK's regulatory requirements The final disclosure framework was released 9 October 2023 with specific sector guidance anticipated in Q1 2024
Task Force on Nature-related Financial Disclosures (TNFD):	TNFD Recommendations	The TNFD's recommendations are designed to help organisations to report and act on evolving nature-related issues with the ultimate aim of supporting a shift in global financial flows away from nature-negative outcomes and toward nature-positive outcomes The TNFD recommends nature-related disclosures related to governance, strategy, risk and impact management and metrics and targets ICBCS is monitoring the development of these recommendations at this stage

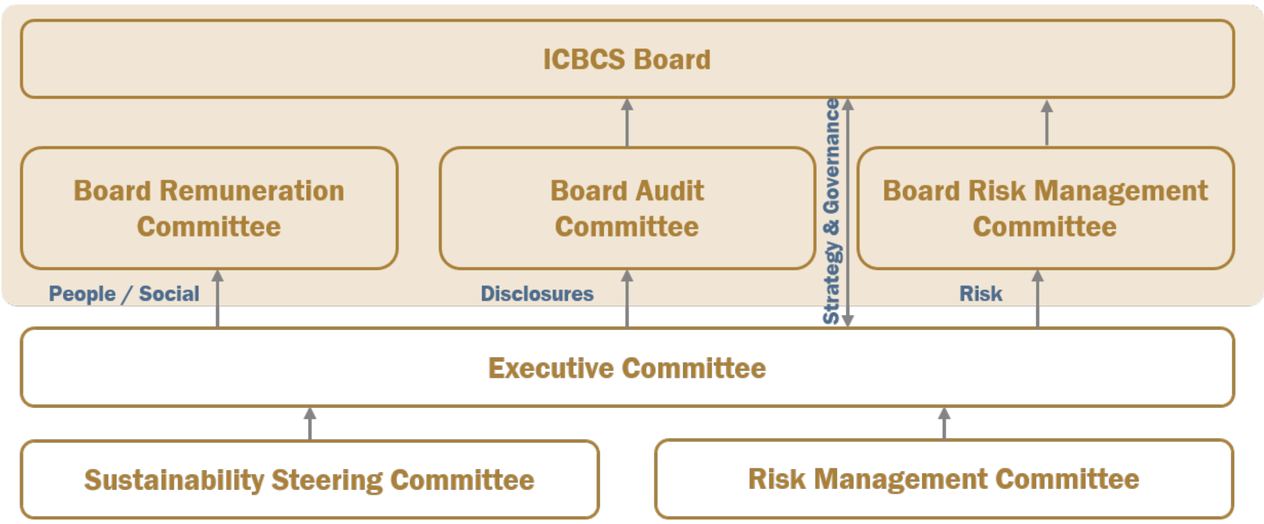
Whilst we are on our continuing journey with regards to sustainability and the associated regulations and disclosure requirements, we set out our alignment to the current TCFD recommendations on the following pages:

- Governance: page 24
- Strategy: page 26
- Risk Management: page 30
- Metrics and Targets: page 33

Governance

We have implemented a robust governance framework surrounding sustainability, including climate.

The primary responsibility for risk management, legal and regulatory compliance and review and monitoring of sustainability-related opportunities resides with the Board. Through delegated authority from the Board, the Board Risk Management Committee (BRMC) and Board Audit Committee (BAC) provide independent and objective oversight of risk management and compliance.



Governance Body	Key Responsibilities	Frequency
ICBCS Board	• Setting strategic direction and risk appetite for sustainability including climate change • Independent oversight ensuring sustainability strategy is implemented, a robust governance process is followed and any material sustainability (including climate change) risk or disclosure issues escalated by BRMC or BAC are addressed • Agree and monitor sustainability-related targets and metrics	Quarterly
Board Remuneration Committee	• Independent oversight of policies and practices related to people and corporate social responsibility • Agree and monitor specific targets and metrics related to equality, diversity and inclusion	Quarterly
Board Audit Committee	• Independent oversight of sustainability-related accounting and disclosures and escalation of material issues to Board • Review and approve disclosures as part of annual report process	Quarterly
Board Risk Management Committee	• Independent oversight by receiving updates on environmental (including climate change) risk issues and trends from the risk management committee and escalation of material issues to Board • Review outputs of scenario analysis or stress testing and the impact on the business model • Review progress towards meeting regulatory expectations	Quarterly
Executive Committee	• Formulate the sustainability strategy and targets/metrics and approval of risk appetite ahead of Board • Integrate Board views into sustainability strategy and ensure appropriate progress is made • Regularly monitor sustainability targets and metrics	Quarterly
Risk Management Committee	• Reviewing the environmental risk appetite and submit for approval by the Executive Committee • Oversight of overall risks (including climate change) and monitor adherence to agreed risk appetite by receiving reports on the development of programmes and any risks identified through our current risk management processes. (See climate-related risk management table in the risk management section) • Review the climate change scenarios and stress tests	Monthly
Sustainability Steering Committee	• Central co-ordination from CEO office across all sustainability initiatives including climate change • Monitor and review the development and implementation of agreed sustainability-related opportunities and climate-related risks mitigation • Annual review of sustainability-related (including climate-related) risks that could impact the current business model / strategy and sustainability-related (including climate-related) opportunities identified	Monthly

The sustainability steering committee is comprised of accountable executives across business units to ensure integrated oversight is achieved. Below is a table illustrating how sustainability is managed through these executives.

Accountable Executives

Role	Board Oversight	Oversight
Chief Executive Officer	ICBCS Board	Strategy and governance
Chief Financial Officer	Board Audit Committee	Accounting and disclosures
Chief Risk Officer	Board Risk Management Committee	Climate Risk Management
Head of Human Resources	Board Remuneration Committee	People and corporate social responsibility
Chief Compliance Office	ICBCS Board through strategy and governance	Controls and processes
Head of Commodities	ICBCS Board through strategy and governance	Business strategic risks and opportunities
Head of Client Monitoring Unit	ICBCS Board through strategy and governance	Client and supplier on-boarding and monitoring

Strategy

For overall strategy refer to sustainability review section in the strategic report.

Sustainability stakeholder impact assessment

To find the balance between being financially and holistically sustainable and managing regulatory and stakeholder expectations we assessed the impact on our business. This will also provide a foundation for sustainability-related engagement plans.

Policy and regulation

- Considering sustainability factors is assumed as part of a company's fiduciary duty and expectations are increasing
- Implementation of UK Companies Act, International Sustainability Standard Board (ISSB), FCA and PRA regulations and disclosures
- Impending enhanced regulation from Transition Planning Taskforce (TPT) and Sustainability Disclosure Requirements (SDR)

Competition

- Delayed reaction to sustainability is likely to be a competitive disadvantage

ICBC Standard Bank

Client expectations

- Growing demands from clients and counterparties with regards to greater transparency, and understanding on the approach to sustainability, which allows them to assess with who and how they partner as a basis for ongoing business relationships

Risk materiality

- Increasing recognition that sustainability factors, specifically climate-related factors, can affect risk and return
- Real life examples of exposure to climate-related events e.g. weather events, fires, floods

Employees expectations

- Talent attraction and retention
- Individual views of creating a positive impact and making conscious decisions related to sustainability

Reputational risk and external stakeholders

- Media
- Insurance providers
- Political and non-governmental organisation (NGO) pressure
- Third party ratings

Identifying and assessing sustainability-related risks and opportunities

Our sustainability strategy work is integrated into our overall strategy assessment which is performed annually during our planning cycle.

In identifying and assessing sustainability-related risks and opportunities, our business lines consider:

- Stakeholders' needs
- Market dynamics for primary sectors
- Geographies/countries in which we operate
- Regulatory requirements and government policies
- Exposures to physical and transition risks
- Credit risk appetite
- Social risks

The client on-boarding process has been enhanced to capture climate-related (alongside broader sustainability) considerations and has been applied in 2023 through our ESG client risk rating assessment.

Client and counterparty credit appetite are subject to climate-related evaluation through a scoring mechanism and consideration is given to the tenor of exposures.

Key considerations

Given the nature of our business, our direct sustainability impact is relatively low, yet we remain aware of the indirect impacts we have through our clients' activities. Our indirect impact will shift based on changes in client behaviour and the risks associated with those behaviours.

The pace of transition is considered to be the more immediate risk to our current strategy, geographic coverage and product offering. Acute physical risks also pose risks over shorter-term horizons.

Technological advances, and related supply chains, are moving forward rapidly, therefore balancing this with environmental or social impacts will be an on-going consideration when assessing both risks and opportunities

We have classified certain activities that are more sensitive from a climate risk perspective into a prohibited list. We will not directly facilitate these activities with any of our current or prospective clients.

Prohibited List

Sector	Activity	Climate change impact
Mining	Mountain top removal	The practice releases air pollutants such as nitrogen oxide and sulphur dioxide contributing to water and soil acidification. Deforestation also results in soil degradation, loss of carbon sinks and biodiversity loss.
Energy	Arctic circle drilling and exploration	Drilling and exploration in this region is particularly sensitive as temperatures in the region have warmed at more than twice the global average, sea-level rise and ocean warmth is accelerating causing biodiversity loss. Melting permafrost also releases trapped methane, the most potent heat trapping gas, into the atmosphere
Energy	Tar sands drilling and exploration	The extraction process is more challenging than with conventional crude leading to higher emissions. Air pollution results from an increase in nitrogen oxide and sulphur oxide release.
Agri-Commodities	Deforestation and/or burning tropical rainforest in order to produce agri-commodities Production or trading in palm oil	The main impacts of deforestation include reduced biodiversity, loss of carbon sinks, release of emissions, disrupted water cycles and soil degradation.
Fisheries	Commercial drift net / bottom trawling fishing	Marine sediments are the largest pool of organic carbon on the planet therefore commercial bottom trawling causes a significant release of emissions contributing to ocean acidification and destruction of marine habitat.

We also have a list of monitored activities which includes oil and gas (across the value chain), and coal (mining and power generation). With monitored activities, we will closely monitor our exposure to these types of activities, the technological advancements made within the activities, and may over time set limits on overall exposure to those activities.

Our balance sheet generally consists of assets with shorter (i.e. less than one-year) tenors. Our planning cycle is a four-year cycle. On this basis, we have assessed our sustainability-related risks and opportunities as short term (less than one year), medium term (between one year and four years) and long term (greater than four years).

Our progress

In 2023, we performed an assessment of our current business model in terms of the climate-related risks as well as any potential opportunities available to us. Our elevated climate risk credit exposure assessment indicated that our exposure to the oil and gas sector represents 57.9% (2022: 58.4%) of total credit exposure with an elevated climate risk (See table in metrics and targets section). Given this high exposure, as well as our expertise in the oil and gas sector, we decided to place our initial focus on transitional opportunities within this sector.

We have started work to establish baselines for our energy, metals and FIC businesses. This will enable us to review and monitor the shift in our portfolios on a quarterly basis with a focus on understanding their sustainability. We will assess the established baselines relevance over the next twelve months and, if deemed appropriate, these will form the basis for our future financial impact disclosure, metrics and targets.

The energy baseline measures client revenue generated by product line (oil, gas, renewables) and product offering (derivatives, physicals and structured trading). This includes anticipated pipeline revenue to view the current versus potential future impact.

Within our established metals business, our focus remains on responsible sourcing practices and assessing the opportunities and risks in metals classed as critical for the transition to a lower carbon economy.

In our FIC business, we assess social impact given that our focus is primarily on emerging markets. As such we have baselined this business through the lens of the client revenue generated by underlying country of risk. We rank the country's social impact using the United Nations (UN) Sustainable Development Goals (SDG) index.

Further to the above, we are establishing a sustainability deal framework to enable us to review our current and future lending portfolio against a set of criteria designed to assess, among other items, the environmental and social impact of our lending transactions.

The tables below indicate our current view and potential time horizons for identified opportunities:

Sustainability-related opportunities over short, medium and long term

Opportunity	Renewable structured finance deals	Financing of lower carbon products	Supporting economic and social development in emerging markets
Description	• Seek to prioritise solar, wind, batteries, transmission infrastructure and other deals with strong sustainability credentials and within risk appetite	• Build out of derivatives in lower carbon products • Increase in physical financing of lower carbon products • Build out more comprehensive Liquefied natural gas (LNG) /gas product suite • Complete and launch NYMEX gas options, National Balancing Point (NBP), EU physical gas	• Create access to and liquidity in emerging markets by developing capital markets, international debt mobilisation and investment • Continued financing of emerging market sovereigns, state owned enterprises and financial institutions in support of the development
Time horizon	Short - long	Short - medium	Short - long
Actual/potential impacts on business model and strategy	• Increase the pipeline and diversity of energy product offerings • Develop expertise as sector evolves • Changes to geographical and customer portfolio	• Facilitate client's transition to lower-carbon fuels	• Potential increased coverage and exposure to emerging and developing regions and countries • Increase regional expertise capabilities

The tables below indicate our current view and potential time horizons over which the strategy could be impacted by climate-related risks:

Climate-related risks identified over short, medium and long term

Transition risks

Risk driver	Policy and Legal	Market and Economic	Technology	Reputation
Description	• Increased pricing of GHG emissions • Enhanced reporting obligations • Regulation of products and services • Exposure to litigation	• Changing customer behaviour • Increased cost of materials • Uncertain market signals	• Substitution of products and services with lower emissions options • Unsuccessful investment in new technologies • Costs to transition to lower emissions technology	• Consumer preference shifts • Stigmatisation of sector • Stakeholder concern
Time horizon	Short - long	Short - long	Short - long	Short - long
Actual/potential impacts on business model and strategy	• Clients in high carbon industries such as oil and gas could see higher production costs and reduced demand for their products through emission pricing schemes, resulting in assets becoming stranded, impaired and written-off • Such clients are also likely to be more exposed to climate-related litigation and scrutiny around their transition plans	• Market sentiment towards carbon intensive assets could change suddenly due to policies such as carbon taxes • Sharp declines in clean energy costs could see consumers move away from carbon-intensive products and businesses • Clients in high carbon industries could see sudden declines in price / valuation of their assets, increasing the probability of default (PD) or assets being stranded	• The market share and pricing power of fossil fuel companies may be reduced leading to falls in valuation and increase in PD • Clients in industries with high energy consumption such as those in steel or chemical production will incur significant costs to transition to lower-carbon alternatives, impacting margins and profitability	• Clients or entire industries may suffer declines in revenues or higher costs to comply with regulation or may be seen as being too slow to transition their business to a low-carbon model • These issues could threaten the viability of such clients or industries • We could in-turn suffer reputational damage from association with such clients and/or industries
Risk types impacted	Credit, market, liquidity, operational	Credit, market, liquidity, operational	Credit, market, operational	Credit, market, liquidity, operational

Physical risks

Severity of change	Acute	Chronic
Climate-related events	• Increased severity of extreme weather events such as hurricanes, wildfires and flooding • Heat stress – acute periods of extreme temperatures • Water stress – acute periods of severe water shortage	• Changes in precipitation patterns and extreme variability in weather patterns • Rising mean temperatures • Rising sea levels
Time horizon	Short, medium and long	Long
Actual/potential impacts on business model and strategy	• Short lived extreme weather impacts • Disruptions to operations, transportation, supply chains, etc. • Damage to physical assets and impacts on insurance pricing and availability	• Impacts due to slow insidious change such as increasing temperature or water stress • Degradation or limitations on resource availability e.g. labour, natural resources, etc.
Risk types impacted	Credit, market, liquidity, operational	Credit, operational

Resilience

Given our largely short-dated trading focus, we can be agile in mitigating some aspects of climate-related risks as well as capturing relevant opportunities as markets develop. In the medium to long term the requirement for energy related working capital solutions may decline. The impacts to business planning and strategy will be constantly evaluated as sustainability and climate-related events evolve.

Our scenario analysis capabilities have been enhanced during 2023, though remain largely focused on stressing the current portfolio positions. Under the current scenarios explored, we consider our business model and strategy resilient. Further resilience will be tested in future as our model matures. For further details on our scenario analysis refer to scenario analysis section.

Risk Management

Our approach is to treat climate-related risk as a cross-cutting risk that manifests through or impacts on other risk types such as credit, market and operational risk.

Climate-related risks can crystallise through either physical or transition risk events. The transmission channels from a climate-related risk that then manifest as a financial or non-financial risk are wide ranging, with an event potentially having a consequential impact on multiple risk types.

We define climate risk in our risk taxonomy in the following way:

Climate-related risks refer to risks (credit, market, operational, etc) posed by the exposure of the Bank or financial sector to physical and transition risks caused by or related to climate change.

Physical risks can be either

- **Acute** risks arising from climate and weather-related events such as hurricanes, floods, wildfires and droughts;
- **Chronic** risks arising from longer term shifts in climate and weather patterns such as rising mean temperatures, rising sea levels and ocean acidification

Transition risks relate to financial risks which may result from the process of adjustment to a lower-carbon and more circular economy. A range of factors could influence this adjustment including:

- policy and regulation;
- disruptive technology and business models;
- shifting societal sentiment; and
- legal case law.

The principal risk type frameworks and policies include specific climate-related considerations. A policy that covers climate-related risk (as a subset of environmental risk) was implemented in the early part of 2022 and is reviewed and updated annually. As a cross-cutting risk, our existing risk governance framework is utilised to manage climate-related risk. For example, if a counterparty is considered to be particularly vulnerable to climate-related risk through the credit assessment process, this will be factored in when determining the appropriate credit rating and appetite towards the counterparty.

The table below illustrates how we are embedding climate-related risk into our existing risk framework.

Climate-related risk management

Risk type	Definition	Climate impact	Progress in 2023	Future enhancements
Credit risk	Risk of loss arising out of failure of counterparties to meet their financial or contractual obligations when due.	A counterparty could be exposed either through physical risks to its operations and assets or transition risk to its sector(s) of operation. Economic impacts may affect their cash flows, leading to a higher PD and/or loss given default (LGD).	Reviewed and recommended enhancements to the climate scorecard, including linking to the client on-boarding assessment. Developing scenario analysis capabilities on the credit portfolio	Consideration of climate-related factors in rating models. Additional stress testing and scenario analysis.
Market risk	Risk associated with the change in market value, earnings (actual or effective) or future cash-flows of a standalone underlying financial instrument.	Market value loss due to societal, legal and technological response to climate change resulting in investor perception of profitability and a consequent revaluation. Physical risk channels can also result in market value loss due to weather impacts particularly affecting commodities and property.	Due to the largely short-term trading book, the principal tool for identifying climate-related market risk is through stress testing. Climate-related stress test implemented and run monthly alongside existing stress scenarios.	Additional stress scenarios including physical risks.
Liquidity risk	Risk that a firm, although solvent, does not have available sufficient financial resources to enable it to meet its obligations as they fall due.	Commodity prices could change significantly leading to margining. Depositors impacted by climate-related risks may withdraw funding to meet their cash flow needs.	Based the idiosyncratic stress off a modified version of the BOE 2021 Climate Biennial Exploratory transition scenario. Consideration of climate-related factors in internal stress scenario	Climate-related factors to be considered where relevant in stress testing.
Operational risk	Risk of loss suffered as a result of inadequacy of, or a failure in, internal processes, people and systems or from external events.	Physical Risk increased through severe weather events affecting our own (or suppliers) operations and assets could lead to financial loss as assets are impacted or liabilities arise. Liability claims may increase from parties who have suffered climate-related losses and seek to recover those losses from those they deem responsible.	Continue to embed climate-related considerations in relevant processes such as the RCSA, New Products Process and physical commodities risk management (PCRA). The PCRA function includes a modelled projection of certain perils such as flood risk on storage facilities as part of the on-boarding assessment.	Climate-related factors to be considered where relevant in scenario analysis.
Supplier risk	Risk of a supplier failing such that the Group is impacted by no longer receiving the relevant service	Suppliers, and their chains, could be impacted or disrupted as a result of climate-related events impacting their ability to provide the relevant services	The supplier risk methodology includes climate-related considerations as part of a wider environmental risk consideration during the supplier on-boarding process. The information used to assess any climate-related risks in relation to suppliers has been enhanced to include new emissions data to inform the existing risk assessment.	The analysis of suppliers will move from a generally qualitative and model-based approach to a more quantitative method as new environmental data is published.

Scenario analysis

We are still in an early phase of quantifying climate scenario analysis and expect to continue to evolve our approach, in particular through modelling a cumulative impact of the scenarios over a specified time horizon. Given this, outputs are not currently being used to inform business decisioning.

We have used scenarios provided by Oxford Economics' Global Climate Service, enabling assessment of physical and transition risks over short, medium and long-term horizons.

Key scenario assumptions

Assumptions per Oxford Economics	Scenarios			
	Net Zero	**Delayed Transition**	**Sustainable Development**	**Climate Catastrophe**
Narrative	Net zero emissions are achieved through early policy action, technological advances and global coordination	Policies to limit global warming are taken relatively late, requiring stronger policy action	Policy burden falls mostly on advanced economies, countries with credible net zero pledges and those historically responsible for the largest share of global emissions (i.e. China and Russia).	Governments fail to meet their policy pledges and the concentration of greenhouse gases in the atmosphere intensifies.
Transition begins	2023 Q4	2030 Q1	2023 Q4	2023 Q4
Nature of transition	Smooth	Disruptive	Uncoordinated	Incomplete
Carbon price (2050, World mean, $/t)	726	541	649	54
Carbon tax revenue recycling	50%	50%	50%	-
Cumulative green energy investment ($ trn)	129	129	118	43
Oil price (2050 $/b)	35.6	45.7	45.6	136
Innovation	Medium	Medium	Medium	Low
Carbon capture	Medium	Medium	Low	None
Physical risk	Low	Low	Low	Extreme
Global warming (2050, mean)	1.5°c	1.7°c	1.7°c	2.2°c

Source: Oxford Economics Q4 2023 Global Climate Service

Conducting climate scenario analysis raises several challenges. The time horizons being assessed are in excess of normal business planning horizons, introducing a level of uncertainty. Data gaps remain a challenge and necessitates a greater use of proxies and assumptions. The need to be forward-looking with climate scenario analysis also means a probability distribution from past shocks is not possible.

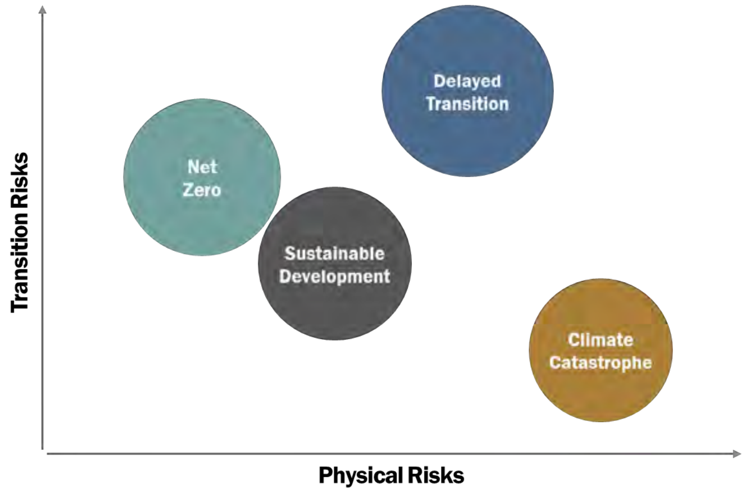
In order to assess the impact of climate change, we leverage predictive capabilities delivered by Oxford Economics (OE). Historically being one of the leaders in economic forecasting, Oxford Economics translates widely accepted climate scenario narratives into a set of macroeconomic projections, out of which we select the variables which are most relevant to our portfolio. Once we finalise a pool of risk drivers, we implement climate scenario analysis within our internally maintained economic capital calculation framework. This allows us to align industry accepted views on climate pathways with our internal assessment of portfolio risk.

The outcome of such an exercise produces the entire distribution of possible losses conditional on pre-specified scenarios, a pool of risk drivers and the magnitudes of their shocks, over specific one-year time horizons for each scenario i.e. year 1, 5, 10, etc. The flexibility of this approach allows calculation of a wide variety of financial KPIs. However, Expected Loss ("EL"), is taken as the most relevant measure of future riskiness and severity of each scenario.

We have conducted a scenario analysis exercise based on a static balance sheet using the December 2023 portfolio. The magnitude of shocks was taken from the years 2024, 2026, 2028, 2032, 2038 and 2050 of the four OE scenarios, which cover a range of different policy and regulatory pathways, temperature outcomes and time horizons.

The size of the bubble below indicates the peak EL across all of the years, with the Delayed Transition scenario producing the largest loss. Climate Catastrophe produced the lowest peak loss though as a high physical risk scenario, damages would be expected to accelerate over time and outside of the periods assessed.

Peak Annual Expected Loss by Climate Scenario



Metrics and Targets

We remain committed to moving towards a lower carbon economy. Given the complexity and relative trade-offs in our markets and products, we are currently focused on baselining the respective businesses from which we will monitor progress and look to set targets in the future.

We have identified the following sectors with elevated climate risk (as noted in the table below) as a metric and continue to monitor our exposure to these sectors.

Credit exposure at year end to sectors with elevated climate risk

Sector	2023 ($m)	2022 ($m)	YoY % change
Agriculture	47.6	7.6	>100%
Airlines	17.8	7.2	>100%
Automobiles	181.0	157.8	14.7%
Chemicals	55.6	51.6	7.8%
Coal[1]	23.0	39.5	-41.8%
Manufacturing[2]	33.2	31.9	4.1%
Metals[3]	358.9	200.1	79.4%
Mining	175.2	120.7	45.2%
Oil and Gas[4]	1,212.9	953.5	27.2%
Power Generation[5]	73.3	63.7	15.1%
Elevated climate risk exposures as % of total exposures	26.6%	26.1%	0.5%

Notes:
Credit exposure represents lending and derivative (measured as potential future exposure at 95% confidence interval) exposure.
1 Represents exposure to power generation from coal-fired power plants
2 Represents exposure to manufacturers other than automobiles and metals
3 Represents exposure to manufacturing of metals including smelting. It does not include metal traders
4 Represents exposure across the value chain i.e. upstream, midstream and downstream
5 Represents exposure to all other forms of power generation excluding coal

In accordance with the Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018 and relevant regulatory requirements, we disclose our Streamlined Energy and Carbon Reporting below.

Streamlined Energy and Carbon Reporting

We monitor our energy use and proactively identify ways to generate energy efficiencies. This includes complying with the UK Government's policy on Streamlined Energy and Carbon Reporting.

The 2023 footprint has been produced in line with the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard (GHG Protocol), and we use the operational control approach to report operational emissions. This means we account for 100% of emissions from operations over which we have operational control (ICBCS and its subsidiaries).

The below summary reflects the emissions across our UK operations year on year and in addition our global operations emissions for 2023.

Summary

	2023 UK	**2023 Global**	2022 UK
Scope 1 emissions[1] / tCO2e	**71**	**95**	-
Scope 2 emissions, location-based / tCO2e	**367**	**734**	450
Scope 3 emissions / tCO2e	**2370**	**3339**	231
Total gross emissions /tCO2e	**2808**	**4168**	681
Energy consumption[2]: emissions / kWh	**2,121,184**	**3,167,668**	2,326,015
Intensity ratio[3]: tCO2e / Average FTE	**3.9549**	**4.9384**	0.9927

[1] tCO2e – tonnes of carbon dioxide equivalent
[2] Total Scope 1 and Scope 2 emissions per kilowatt-hour (kWh)
[3] Average full-time equivalent (FTE) headcount
Scope 1 – All direct emissions from sources that are owned or controlled by ICBCS, for example, natural gas from boilers and fugitive emissions (gases accidentally released into the atmosphere) from air conditioning units.
Scope 2 – Indirect emissions from electricity purchased and used by the organisation. Emissions are created during the generation of purchased energy, for example, purchased electricity and district heating. This is calculated using an average emissions intensity for the grids on which the energy consumption occurs.
Scope 3 – All other indirect emissions from non-owned or controlled sources, including business travel (air, rail, grey fleet, and rental cars) and upstream leased assets (data centres). This does not include the emissions that we finance.

Our report is compiled by a third party.

Due to our improved processes and guidance in 2023, we have made the following amendments to our emissions reporting and adjusted 2022, where the data was available:

- Sourced the data for scope 1 emissions
- Changed the classification of our data centres to upstream leased assets (scope 3) from direct emissions (scope 2) in 2022. Emissions for the UK data centre amounted to 230 tCO2e in both 2023 and 2022. This further resulted in the data centre energy consumption being excluded from total energy consumption
- Business travel changed from car travel only in 2022 to include air travel, taxis, rail transport and hotels in 2023. This amounted to 2,140 tCO2e (2022: 1 tCO2e) of scope 3 emissions
- Changed the intensity ratio from square metres in 2022 to average FTE in 2023 to align to market practice

We obtained activity data from the respective landlords and service providers. For business travel, we used the distance-based method (kilometres travelled) and cabin class where applicable. We converted the UK activity data into tonnes of carbon dioxide equivalents (tCO2e) by multiplying by external emissions factors obtained from the Department for Energy Security and Net Zero and Department for Business, Energy and Industrial Strategy – GHG Conversion Factors. For the global conversions we used the environmental guidelines of the applicable country.

The intensity metric we have chosen to use is tonnes CO2e per average FTE headcount. For the UK operations we have used the UK average FTE of 710 (2022: 686). This gives a total intensity ratio of 3.9549 tCO2e/FTE (2022:0.9927 tCO2e/FTE). For global operations we have used an average FTE of 844.

We are yet to commence our energy saving initiatives which are expected to materialise as part of our process of refurbishing our UK office following the extension of our lease by a further 10 years. Throughout the refurbishment planning process we are taking energy saving considerations into account and expect to realise these on completion.

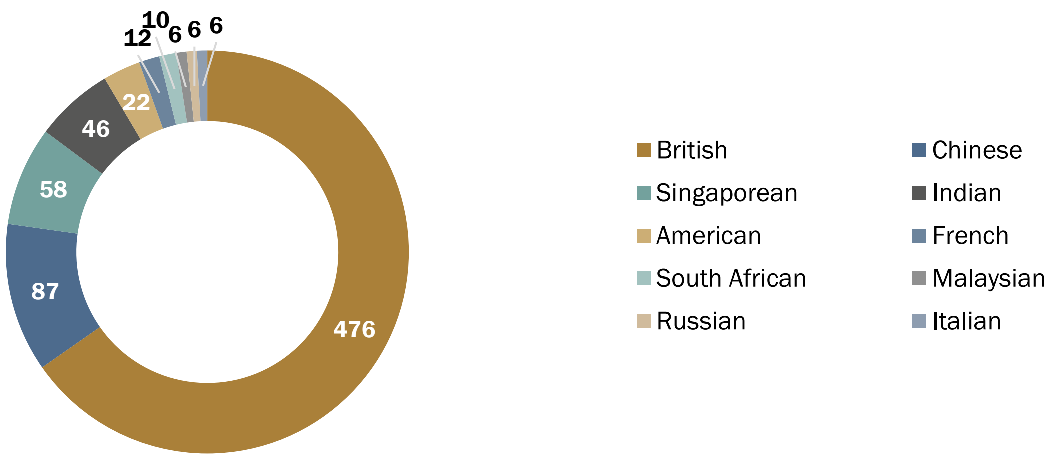
Whilst our sustainability report focuses on climate-related disclosures, as an organisation, we have taken the more holistic view of sustainability which includes monitoring our ED&I related metrics as disclosed below.

ED&I Related metrics

There are over 44 nationalities represented in the Bank across all three regions that we operate in. We have noted an increasing spread in our age demographic leading to a multigenerational workforce.

Our top ten nationalities are represented in the graph below, with our highest representation being British followed by Chinese.

Nationalities



Age Cohort split by gender and grade

Overall 34% of our permanent and fixed term employees are female. 17% at Director level and above and 33% at senior manager level.

The majority of our employees fall within the 31-50 age bracket with the largest differential between genders in the over 50 age bracket.

Level	Age	Male	Female	Total	Male %	Female %
Director, Managing Director and Executive Managing Director	Under 30	0	0	**0**	0%	0%
	31-50	114	26	**140**	81%	19%
	50+	52	9	**61**	85%	15%
Senior Manager	Under 30	3	2	**5**	60%	40%
	31-50	88	51	**139**	63%	37%
	50+	29	6	**35**	83%	17%
Manager	Under 30	10	4	**14**	71%	29%
	31-50	80	57	**137**	58%	42%
	50+	20	5	**25**	80%	20%
Staff	Under 30	57	53	**110**	52%	48%
	31-50	65	51	**116**	56%	44%
	50+	18	14	**32**	56%	44%
Total	**Under 30**	70	59	**129**	54%	46%
	31-50	347	185	**532**	65%	35%
	50+	119	34	**153**	78%	22%
		536	**278**	**814**[1]	**66%**	**34%**

[1] Our demographic data is based on permanent and fixed term employees as at 31 December 2023

3. Directors' report

We present our directors' report and financial statements for the year ended 31 December 2023 for ICBC Standard Bank Plc ('the Company' or 'ICBCS') and its subsidiaries (together 'the Group').

In accordance with Section 414A of the Companies Act 2006, we have presented a strategic report on pages 6 to 22 of this annual report. This contains a review of the Group's businesses, further information on the principal risks and uncertainties facing the Group and a description of its future outlook in accordance with section 414C of the Companies Act 2006.

The strategic report also contains information on certain matters which would otherwise be required in the directors' report, including under schedule 7 of the Large and Medium-sized Companies and Groups (Accounts and Reports) Regulations 2008, namely; financial instruments, future developments in the business of the Company, charitable donations, engagement with employees, and engagement with suppliers, customers and others in a business relationship with the Company. The streamlined energy and carbon report required under the same regulations is included in the sustainability report.

Going concern basis

The financial statements have been prepared on a going concern basis as we are satisfied that the Company and Group have the resources to continue in business for a period of at least 12 months from approval of the financial statements. In making this assessment, we have considered a wide range of information relating to present and future conditions, the business plan for the next and subsequent three years, which includes the impact of forthcoming regulatory changes, and the ability and willingness of the shareholders to provide support as and when required. This assessment also considered forecasts prepared by the Group, which incorporated a combined stress on cash flows and counterbalancing capacity to stress test impacts on capital requirements and liquidity.

The Company and Group maintain a strong capital and liquidity position. The demonstrable ongoing support by the controlling shareholder is an important aspect supporting the going concern assessment. Industrial and Commercial Bank of China Limited ('ICBC') has issued a statement of support in favour of the Company confirming its position as a long-term investment and as an integral part of the ICBC Group's overall operational strategy, which remains valid until ICBC ceases to be the controlling shareholder. ICBC Group's goal is to develop ICBCS into a major link in its international network, and therefore, it undertakes to support the Group's development and growth. ICBC confirms that it intends to financially support the Group in ensuring that it meets all financial obligations as they fall due, including the maintenance of a minimum capital adequacy level. Specifically, ICBC intends to provide funding and capital support to the Group and commits its intention to subscribe for certain 'qualifying instruments' as and when ICBC receives written notice from the Group that its capital and reserve funds amount to (or will foreseeably in the near-term amount to) less than the minimum required amount of capital and reserve funds as determined in accordance with the rules and regulations of the Prudential Regulation Authority (or its successor).

Further information about the future strategy and outlook, as well as the principal risks and uncertainties facing the Group, is provided in the strategic report. Additionally, the Group's policies and processes for managing credit, liquidity and market risk, and the Group's approach to capital management and allocation, and stress testing, are described in note 37 to the financial statements.

ICBC has a controlling interest of 60% in the Company with the balance of 40% owned by Standard Bank Group Limited.

Based on the above considerations, we have a reasonable expectation that the Company and Group have adequate resources to continue in operational existence for a period of least 12 months from the date of approval of these financial statements.

Dividends

No dividend has been paid or declared on the ordinary shares by the Company since the end of the previous financial year.

The directors are considering a final dividend payment in respect of the financial year ended 31 December 2023 but no dividend has been recommended at the date of these financial statements.

Internal control and financial reporting

The directors who held office at the date of approval of this report confirm that, as far as we are each aware, there is no relevant audit information of which the Group's auditors are unaware, and that we have each taken all steps that we ought to have taken as directors to make them aware of any relevant audit information and to establish that the Group's auditors are aware of that information.

As directors we are responsible for internal control in the Group and for reviewing its effectiveness. Procedures have been designed for safeguarding assets against unauthorised use or disposition; for maintaining proper accounting records; and for the reliability of financial information used within the business or for publication. Such procedures are designed to manage rather than eliminate the risk of failure to achieve business objectives and can only provide reasonable and not absolute assurance against material misstatement, errors, losses or fraud.

The procedures that we have established are designed to provide effective internal control within the Group.

Such procedures for the ongoing identification, evaluation and management of the significant risks faced by the Group have been in place throughout the year and up to 29 February 2024, the date of approval of the consolidated annual report for the year ended 31 December 2023.

Our directors and senior management of the Group have adopted policies which set out the Board's attitude to risk and internal control. Key risks identified by the directors are formally reviewed and assessed by the Board, in addition to which key business risks are identified, evaluated and managed on an ongoing basis by means of procedures such as physical controls, credit and other authorisation limits and segregation of duties.

The Board also receives regular reports on any risk matters that need to be brought to its attention. Significant risks identified in connection with the development of new activities are subject to consideration by the Board. For the period under review, we are satisfied that the Group's risk management processes operated effectively and that the Group has managed its risk in support of its strategy.

There are well established budgeting procedures in place and reports are presented regularly to the Board detailing the results of each principal business unit, variances against budget and prior year, and other performance data.

The effectiveness of the internal control system is reviewed regularly by our Board and the Board Audit Committee, which also receive reports of reviews undertaken by the internal audit function as well as reports from the external auditors, which include observations on internal control matters that they have identified. In reviewing the internal control system the Board also takes into account regulatory requirements and expectations.

Transactions with directors and related parties

There are no loans made to directors and details of related party transactions are included in note 33 to the financial statements.

Directors' liability insurance and indemnities

The Group maintained directors' and officers' liability insurance during the twelve months ended 31 December 2023. The Company has entered into qualifying third-party indemnity arrangements for the benefit of all its directors in a form and scope which comply with the requirements of the Companies Act 2006 and which were in force throughout the year and remain in force.

Directors and directors' interests

The directors who held office during the course of 2023 or who hold office as at the date of this report are as follows:

Current directors:

Isabella da Costa Mendes	Independent non-executive director
Judith Eden	Independent non-executive director and Senior Independent Director
Andile Kenneth Fihla	Non-executive director
David Hodnett	Non-executive director
Fang Hu	Appointed as non-executive director on 2 May 2023
Yabing Hu	Non-executive director
Philip Hurley	Executive director
Binliang Jin	President and executive director
Garry Jones	Independent non-executive director
Li Li	Non-executive director
Andrew Simmonds	Chairman and Independent non-executive director
Shoujiang Wang	Executive director
Wenbin Wang	Chief executive and executive director

Former directors

Ruixiang Han	Resigned as non-executive director on 2 May 2023

None of the directors held any beneficial interest in the ordinary share capital of the Company during the year or at 31 December 2023.

Branches

The Company has an operating branch in Singapore.

Political donations

The Group did not make any political donations or incur any political expenditure during the year.

Auditor

Deloitte LLP has indicated its willingness to continue as auditor of the Group for the year ended 31 December 2024. Accordingly, a resolution is to be proposed at the next annual general meeting for the re-appointment of Deloitte LLP as auditor of the Group.

Employment of Disabled Persons

It is the Group's policy to ensure that all employees and job applicants are given equal opportunities and that they do not face discrimination on disability or any other grounds. We are committed to providing support to disabled employees to enable them to work to maximum effect within any limits imposed by their disability, including ensuring appropriate opportunities for training, career development and promotion. Should an employee become disabled during their career with the Group, reasonable adjustments will be made where required.

Corporate Governance

The Group has applied the Wates Corporate Governance Principles for Large Private Companies (published by the Financial Reporting Council ('FRC') in December 2018 and available on the FRC website), under The Companies (Miscellaneous Reporting) Regulations 2018, for the year ended 31 December 2023. Where appropriate the Group additionally looks to follow corporate governance best practice in line with expectations of a regulated bank proportionate with its size and complexity.

The following describes how the principles of the Wates Corporate Governance Code have been met. Additional information on the governance structure and processes underpinning the Group's capital and risk management can be found in the Pillar 3 disclosure document.

Principle 1 – Purpose and Leadership

The Group's purpose, as set by the Board, is to serve our clients globally as the Commodities and Financial Markets hub of ICBC and is underpinned by values of; Integrity, Openness, Prudence, Innovation and Excellence.

The purpose and values align directly with our desire to maintain a reputation for high standards of business conduct. Consistent with these values, the Board sets and oversees a culture, conduct and compliance agenda which supports the way that the Group does business. In addition, the Board has set and continues to support the Group's commitment to enabling our clients to pursue our shared goals of social and economic development, and environmental sustainability.

An annual detailed strategic review and planning session is factored into our Board timetable and provides us with an opportunity to assess and, if necessary, re-direct the Group's strategic priorities. When making decisions on the strategic priorities, the Board considers the consequences in the long term with a view to growing and strengthening the sustainability of the business. The Group has a rolling four-year business plan which is updated, reviewed, and approved, by our Board at least annually.

We receive a culture dashboard as part of the quarterly chief executive's Board report and progress on culture and conduct are factored into the balanced scorecard review of the Bank's performance by the Remuneration Committee on an annual basis.

Principle 2 – Board Composition

Our Board is led by an independent non-executive Chairman and there are a further eight non-executive directors, three of whom are also independent. The presence of four independent non-executive directors with extensive industry experience provides valuable independent challenge, which aids effective decision making. In addition, there are four executive directors including the chief executive. A list of the current Board directors who served during 2023 is provided above. The Board recognises the importance of diversity and that it is a much wider issue than gender. The Board agrees that its members should collectively possess the broad range of skills, expertise and industry knowledge, business and other experience necessary for the effective oversight of the Group's business. Two of the four Board committees are chaired by female independent non-executive directors and four nationalities are represented on the Board.

The Board Remuneration Committee reviews proposed director appointments in accordance with suitability requirements and advises shareholders on proposed director appointments. There is a tailored induction programme for all new directors.

Periodic Board skills self-assessments are carried out, which assist with identifying Board training areas and also inform skills to be strengthened in future director appointments.

During the year an externally led board effectiveness evaluation was undertaken with the results discussed by the Board. The Board were supportive of the recommendations for improvement and valued the opportunity to engage on improving the governance framework. The implementation of the actions for improvement are being monitored by the Chairman and wider Board.

Principle 3 – Director Responsibilities

Our Chairman is responsible for leading the development of, and monitoring the effective implementation of, policies and procedures for the induction, training and professional development of all members of the Board. In this regard, Board members have participated in internal training and briefings during the year. Directors also supplement formal meetings and training with regular executive engagement meetings relevant to their roles. Directors are also accountable for personal continued professional development planning, linked to their roles and specific portfolios and all directors have access to the advice and services of the Company Secretary and may, if they wish, take professional advice at the Company's expense.

The Board's mandate, which is reviewed annually, includes the Board's purpose, its authority, powers of delegation and terms of reference and also details its operations. The Board's key responsibilities include to:

- agree the Group's objectives and the strategies and plans for achieving these;
- ensure that an effective risk management process, including a robust and prudent risk appetite statement, exists and is maintained;
- ensure that an adequate budget and planning process exists, that performance is measured against budgets and plans, and approve annual budgets for the Group;
- articulate and maintain a culture of risk awareness and ethical behaviour for the Group to follow in pursuit of its business goals;
- ensure that reporting to the Board and/or Board committees is comprehensive across prudential requirements as well as conduct of business;
- assume ultimate responsibility for regulatory and legal compliance;
- assume ultimate responsibility for the integrity of accounting and financial reporting systems, the approval of financial statements, oversight of capital and liquidity adequacy including approval of Internal Capital Adequacy Assessment Process (ICAAP), Internal Liquidity Adequacy Assessment Process (ILAAP) and Recovery and Resolution plans (RRP);
- review and approve the Operational Resilience self-assessment and provide oversight of operational performance against impact tolerances; and
- oversee the Group's responsibilities and response to Environmental (including climate change), Social and Governance ("ESG") matters, including setting strategic direction and risk appetite for sustainability-

related risks, monitoring strategy implementation, and providing oversight and approval of sustainability reporting and disclosures.

The Board met during 2023 for its scheduled quarterly Board and Board committee meetings. The Board also held its annual Board strategy day in the fourth quarter of the year, where the Board reviewed Management's strategic plans from both a business line and corporate perspective for 2024 and beyond. These plans once finalised were incorporated into a four-year Business and Financial Plan which the Board approved in November 2023.

During the year, the Board delegated certain specific oversight and decision making to the following sub-committees:

Board Audit Committee

This independent non-executive board committee monitors the processes for identifying, evaluating and managing risks and controls. In particular, this includes the quality, integrity and reliability of financial and accounting control systems. The committee's other responsibilities are to review the scope of work of external and internal audit, to receive regular reports from internal audit and the external auditors and to review the financial statements focusing in particular on accounting policies, and areas of management judgement and estimates. The Committee is also responsible for providing independent oversight of sustainability-related accounting and disclosures (including as part of the Annual Report Process). The committee has scheduled quarterly meetings plus ad-hoc meetings as required and met a total of five times during 2023.

During 2023 the work of the Committee included, amongst others, the following:

- A review and endorsement of the Consolidated Annual Report and Accounts for the year ended 31 December 2022, including consideration and challenge of the accounting treatment with respect to significant matters of judgement, major reporting items, significant transactions and accounting policy developments.
- Consideration of quarterly reports from the Chief Financial Officer including quarterly financial performance, significant transactions and matters of judgement, the reporting control environment and other notable financial items.
- Approval of the internal audit plan, and reviewing and monitoring the closure of audit findings.
- Considered and confirmed the independence and effectiveness of Internal Audit.
- Consideration of quarterly reports from the external auditor including their approach to the audit of key areas, such as physical commodities, IT systems and controls, valuations, day-1 profit recognition and the deferred tax asset.
- Consideration of an Operational Risk assurance review of the implementation of a major Commodities Business IT platform change programme.
- Consideration of the external auditor's management letter following the completion of the annual audit and monitoring the completion of recommended actions.
- Considered an evaluation of the external audit process, including the external auditors' independence and effectiveness, and recommended the re-appointment of the external auditors.
- The review and approval of non-audit services provided by the external auditors, in compliance with the non-audit services policy, to ensure that no conflicts of interest arise and independence is maintained.
- A review of the external auditor's assurance report on Client Assets to the FCA for the year ended 31 December 2022.

Membership: Judith Eden (chair), Isabella da Costa Mendes, Garry Jones and Andrew Simmonds.

Board Risk Management Committee

This non-executive board committee provides an independent review and challenge to the Group's risk and compliance policies and the composition of the risk portfolio, its concentrations and the risk-taking decisions of the Group, covering all aspects of risk including market, credit, country, liquidity, operational, climate, business and reputational risks. The committee oversees the formulation of a robust and prudent risk appetite statement, its ongoing adherence and monitors the implementation of corrective actions in event of a breach. The committee is also responsible for providing independent oversight of compliance across the Group. The committee complements the Audit Committee which also studies, inter alia, risk controls and their operation, but from a different perspective. The Committee has scheduled quarterly meetings plus ad-hoc meetings as required and met a total of four times during 2023.

During 2023 the work of the Committee included, amongst others, the following:

- Overseeing the setting and monitoring of risk appetite (including recommending the risk appetite statement to the Board for approval) and the cascading of the risk appetite to the risk sub-types and limits.
- Review of the Compliance Monitoring management information, including detailed analysis and discussions on the impact and implementation of sanctions on relevant jurisdictions.
- A review of the Bank's stress testing and reverse stress testing scenarios.
- Review and challenge of the ICAAP, ILAAP, Recovery Plan and Solvent Wind Down analysis documents, with the Committee recommending the documents to the Board for approval.
- Consideration of the Bank's Operational Resilience Self-Assessment, with the Committee recommending the Self-Assessment document to the Board for approval.
- Periodic reviews of the development of the Bank's climate and environmental risk framework and the monitoring of progress towards meeting regulatory expectations in this developing area.
- Consideration of lessons learned from cyber-attacks on third parties and market events such as the 2022 LME Nickel disorder.
- Review of the Bank's cyber security maturity self-assessment project.

Membership: Isabella da Costa Mendes (chair), Judith Eden, Andile Kenneth Fihla, David Hodnett, Yabing Hu, Garry Jones, Li Li and Andrew Simmonds.

Board Remuneration Committee

This non-executive board committee approves remuneration policy and long-term incentive schemes for staff, sets the remuneration of executive directors and other senior executives, and approves guidelines for the Group's annual salary and incentive reviews. The Committee also acts in an advisory capacity to review and provide feedback to shareholders on proposed candidates for director appointments, including consideration of knowledge, skills and experience. The committee has scheduled quarterly meetings plus ad-hoc meetings as required and met a total of five times during 2023.

During 2023 the work of the Committee included, amongst others, the following:

- A quarterly review of a range of headcount metrics across departments, considering the impact of various factors such as employment market conditions and inflationary pressures and factoring learnings into remuneration decisions.
- The Committee specifically considered and responded to the impact of the raised inflation environment on the cost of living during the year when agreeing fixed pay awards.
- A review of the Bank's overall performance against an agreed Balanced Scorecard of performance metrics and the factoring of this performance into remuneration outcomes.

- Oversight and approval of the development of an improved mechanism to link certain deferred incentive awards to Group performance.
- A periodic review of deferred remuneration awards due to vest to ensure that any matters which could warrant non-payment or clawback of prior payments are fully considered ahead of awards vesting.
- Review of the Bank's people strategy and equality, diversity and inclusion (ED&I) plans, including the monitoring of progress against various metrics. During the year there was a continuing focus on improving the gender balance and the Committee also reviewed progress on work to improve data collection related to a number of additional diversity characteristics.

Membership: Garry Jones (chair), Judith Eden, Andile Kenneth Fihla, Fang Hu, Li Li and Andrew Simmonds.

Ruixiang Han served on this committee during the period until resigning as a director of the Company.

Board IT Committee
This Committee assists the Board in discharging its duties in relation to oversight, at the strategic level, of the Group's IT environment across technology execution, governance and resilience; cyber security and cyber resilience; technology investment; enterprise data management; regulatory interactions; and digital transformation and e-commerce.

The Committee complements the Board Audit Committee and Board Risk Management Committee. The Committee met three times during the year.

Membership: Garry Jones (chair), Isabella da Costa Mendes, David Hodnett, Yabing Hu, Philip Hurley, Wenbin Wang and Shoujiang Wang.

Executive Committee
This committee is responsible for the day-to-day management of the Group. Subject to the overall authority of the Board, the committee meets regularly to develop business strategy, initiate and review strategic initiatives, review and recommend business plans to the Board, monitor financial performance against budget, monitor risk, and oversee key capital management and liquidity planning documents, and all matters related to regulatory responsibilities. The committee reviews the viability early warning indicators on a monthly basis and ensures appropriate actions are taken. The Committee is also responsible for formulating (for review and agreement by the Board) the Group's responsibilities and response to Environmental (including climate change) and Social and Governance matters. At its monthly meetings the committee also reviews the key activities of its sub-committees.

The Committee has scheduled monthly meetings and additional ad-hoc meetings take place as required.

Membership: The committee comprises executive directors and certain senior executives. The members of the committee at the date of this report were Wenbin Wang (Chair and Chief Executive), Philip Hurley (Chief Risk Officer), Binliang Jin (Alternate Chair, President and Head of Global Markets), Shoujiang Wang (Deputy General Manager), Bradley Duncan (Chief Financial Officer), Pamela Hacker (Chief Operating Officer) and Yi Qiu (Deputy General Manager). Other key business and functional heads are also standing attendees.

The major sub-committees supporting the Executive Committee in fulfilling its responsibilities during the year were the asset and liability management committee, risk management committee, regulatory compliance committee, counterparty risk management committee, new products and significant transactions approval committee, transaction acceptance committee, investment and change committee and Asia and New York regional management committees.

Principle 4 – Opportunity and Risk

We consider the long-term strategic opportunities as part of our annual strategic board review and planning cycle. Our Board sets the Group's risk appetite statement and delegates to the Chief Executive and executive management team responsibility for pursuing business opportunities in line with the agreed business strategy, within the risk appetite. Opportunities identified by executive management which are either extraordinary or outside of usual strategy and risk appetite are escalated to the attention of the Board.

New business opportunities are subject to rigorous internal governance and approval processes supported by specialist executive sub-committees such as the new products and significant transactions approval committee and the transaction acceptance committee, with oversight from the Executive Committee.

Our Board has ultimate responsibility for the oversight of risk, capital planning, liquidity management and regulatory and legal compliance (including conduct risk). The Board delegates certain responsibilities to the Board Risk Management Committee and Board Audit Committee, as summarised earlier in this report.

The principal risks to which the Group is exposed together with the mitigating actions are set out in note 37 to the Group's annual financial statements. Also included in note 37 is further information on risk management, including the governance structure of the risk management framework, stress testing and detailed risk category descriptions and analysis.

Principle 5 – Remuneration

As described above, the Board delegates oversight of remuneration policy and practice to the Board Remuneration Committee. The Group's remuneration policy statement is included within its consolidated annual report (see pages 46 to 47) and covers remuneration governance process, principles and strategy, and also the application of policies in relation to discretionary incentive awards, deferral and adjustment.

Principle 6 – Stakeholder Relationships and Engagement

In consideration of our responsibilities under section 172(1) of the Companies Act 2006 the Board has defined our key stakeholders as shareholders, employees, regulators, clients, suppliers, community and environment. Details on stakeholder relationships and engagement are included in the strategic report.

Approved by the Board and signed on its behalf by:

R. Otterson

R Otterson
Secretary

29 February 2024

20 Gresham Street
London EC2V 7JE

Public company limited by shares
Registered in England and Wales No. 2130447

4. Remuneration policy statement

Introduction

This statement provides stakeholders with an understanding of our remuneration philosophy and practices as at February 2024.

At the core of our strategy is the value we place on our people as a primary differentiator. Highly skilled and experienced people, both business generators and enablers, are essential in delivering sustainable growth for shareholders within prudent risk boundaries.

The primary objective of our remuneration strategy is to implement designs and practices that only reward value delivered on a pay for performance basis within the context of control management and sustainability, adjusted appropriately for risk assumed.

A second objective is to be competitive in remuneration in the global marketplace for skills. We seek to reward all our people in a manner that is fair, both to the individual and to shareholders, while avoiding a bonus-centric culture that distorts motivations and may encourage excessive risk-taking.

Promoting effective teamwork is a third vital component of our remuneration strategy. Remuneration scheme designs and performance evaluation processes must motivate strong and sustained performance within teams.

Within this wider strategic context, the Board remuneration committee (Remco) seeks to design and implement structures and practices that are specifically tailored to our business strategy.

Principles that underpin the remuneration strategy

The key principles that underpin our remuneration strategy and determine individual reward are as follows:

- We reward sustainable, long-term business results and no remuneration schemes are linked by formula to revenue generation.
- Individual rewards are determined according to Group, business unit and individual performance, based on financial and non-financial factors, including behaviour. Wherever available and relevant, external market information is used to inform remuneration decisions.
- The Bank aims to adhere to ICBC Head Office guidance on staff cost management which encourages institutions within the ICBC Group to better optimise cost resource allocation, monitor staff cost and improve cost efficiency.
- The focus is on total reward, being fixed and variable remuneration. We seek to be competitive in both elements, but annual incentives are not a function of a guaranteed package. The intention is to provide both total compensation, and its composition, at market-competitive levels, drawing on relevant information from various sources, including external advisers.
- We operate a deferred discretionary incentive arrangement, the purpose of which is to strengthen the retention effect of incentive remuneration and also to enable us to comply with regulatory requirements, including those in relation to deferrals and malus and clawback.
- Employees identified as material risk takers (MRTs), as categorised under the qualitative and quantitative criteria of the UK FCA/PRA remuneration regulations, are subject to deferral conditions for any discretionary incentive awarded.

- We do not discriminate between employees based on diversity or any protected characteristic. Gender pay gap reporting is submitted per legal requirements and the outputs are reviewed at Board level with any necessary action plans taken.
- Remuneration designs comply with all legal, regulatory and risk adjustment requirements (including the ability to apply positive adjustments for exceptional behaviours) and promote risk management in line with our stated strategy and risk tolerance. A robust risk adjustment policy is adhered to at an individual and pool level. Discretionary incentive awards may be considered for risk and performance adjustment in the case of an adjustment event; this could include malus during the vesting period of a deferred portion of an award and, for MRTs, clawback after vesting of any portion of an award.

Remuneration Governance

Remco is responsible for determining the broad policy for executive remuneration, and approving the entire individual remuneration packages for each of the executive directors and senior managers as determined by the relevant regulatory criteria, and other senior executives, as appropriate. ICBC management assignees are additionally subject to final ICBC Group moderation and adjustment.

The Committee oversee the remuneration policy and remuneration packages for executive remuneration for MRTs and ensure that competitive reward strategies and programmes are in place to facilitate the recruitment, motivation and retention of high-performing staff at all levels in support of realising corporate objectives and safeguarding shareholder interests.

As an integral part of growing and fortifying our human capital, Remco regularly reviews the remuneration policies, structures and practices, to ensure the principles behind the reward strategy and the elements of the strategy itself, are effective and in accordance with regulatory requirements.

Stakeholders are enabled to make a reasonable assessment of reward practices, and members of Remco have unrestricted access to information that informs their independent judgements on the possible effects that remuneration may have on compliance with risk, regulatory and behavioural controls.

Remco annually approves our incentive pools and oversees the principles applied in allocating these pools to business units and individual employees. These pools are shaped by a combination of shareholder, Group and business unit profitability, and multi-year financial metrics, taking account of capital utilised, risks assumed and an evaluation of the business area's future development and growth prospects.

Remco includes representatives from Board Audit and Board Risk Management Committees who bring their relevant experience to the process including independent non-executive directors. Remco comprises executives who have experience in evaluating risk and the requirement to operate commercially and sustainably in a competitive environment. Transparency on remuneration designs and processes is maintained with employees and with shareholders.

5. Statement of directors' responsibilities

The directors are responsible for preparing the strategic report, directors' report and the Group and Company financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare group and company financial statements for each financial year. Under that law, the directors have prepared the Group and Company financial statements in accordance with international accounting standards in conformity with the requirements of the Companies Act 2006 and International Financial Reporting Standards (IFRSs) as adopted by the United Kingdom (UK).

Under company law, the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the Group and the Company and of their profit or loss for that period. In preparing each of the Group and Company financial statements, the directors are required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and accounting estimates that are reasonable, relevant and reliable;
- state whether they have been prepared in accordance with IFRSs as adopted by the UK;
- assess the Group and Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and
- use the going concern basis of accounting unless they either intend to liquidate the Group or Company or to cease operations, or have no realistic alternative but to do so.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the Company's transactions, and disclose with reasonable accuracy at any time the financial position of the Company and the Group, and enable them to ensure that the financial statements comply with the Companies Act 2006. They are responsible for such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error, and have general responsibility for taking such steps as are reasonably open to them to safeguard the assets of the Company and the Group and to prevent and detect fraud and other irregularities.

Under applicable law and regulations, the directors are also responsible for preparing a strategic report and directors' report that complies with that law and those regulations.

The directors are responsible for the maintenance and integrity of the corporate and financial information included on the Company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

Responsibility statement of the directors in respect of the annual financial report

We confirm that to the best of our knowledge:

- the financial statements, prepared in accordance with the applicable set of accounting standards, give a true and fair view of the assets, liabilities, financial position and profit or loss of the Company and the undertakings included in the consolidation taken as a whole; and
- the strategic report and directors' report include a fair review of the development and performance of the business and the position of the Company and the undertakings included in the consolidation taken as a whole, together with a description of the principal risks and uncertainties that they face.

Approved by the Board and signed on its behalf by:

R. Otterson

R Otterson
Secretary

29 February 2024
20 Gresham Street
London EC2V 7JE

Public company limited by shares
Registered in England and Wales No. 2130447

6. Independent auditor's report to the members of ICBC Standard Bank Plc

1. Opinion

In our opinion:

- the financial statements of ICBC Standard Bank Plc (the 'the Company') and its subsidiaries (the 'Group') give a true and fair view of the state of the Group's and of the Company's affairs as at 31 December 2023 and of the Group's profit for the year then ended;
- the Group financial statements have been properly prepared in accordance with United Kingdom adopted international accounting standards and International Financial Reporting Standards (IFRSs) as issued by the International Accounting Standards Board (IASB);
- the Company financial statements have been properly prepared in accordance with United Kingdom adopted international accounting standards and as applied in accordance with the provisions of the Companies Act 2006; and
- the financial statements have been prepared in accordance with the requirements of the Companies Act 2006.

We have audited the financial statements which comprise:

- the consolidated and company balance sheets;
- the consolidated income statement;
- the consolidated statement of comprehensive income;
- the consolidated and company statements of changes in equity;
- the consolidated and company statements of cash flows;
- the significant accounting policies; and
- the related notes 1 to 40.

The financial reporting framework that has been applied in the preparation of the Group financial statements is applicable law, United Kingdom adopted international accounting standards and IFRSs as issued by the IASB. The financial reporting framework that has been applied in the preparation of the Company financial statements is applicable law and United Kingdom adopted international accounting standards and as applied in accordance with the provisions of the Companies Act 2006.

2. Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of our report.

We are independent of the Group and the Company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the Financial Reporting Council's (the 'FRC's') Ethical Standard as applied to listed public interest entities, and we have fulfilled our other ethical responsibilities in accordance with these requirements. The non-audit services provided to the Group and the Company for the year are disclosed in note 30.7 to the financial statements. We confirm that we have not provided any non-audit services prohibited by the FRC's Ethical Standard to the Group or the Company.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

3. Summary of our audit approach

Key audit matters	The key audit matters that we identified in the current year were: • Valuation of level 3 financial instruments • Recognition of Day 1 profit and loss (P&L) arising from significant trades; and • Recognition of the UK deferred tax asset (DTA) Within this report, key audit matters are identified as follows: Newly identified Increased level of risk Similar level of risk Decreased level of risk
Materiality	The materiality that we used for the Group financial statements was $13.0m which was determined on the basis of 0.7% of net assets of the Group.
Scoping	Our audit was focused on the London entity of the Group, which accounts for 99% of the Group revenue and 94% of the Group's net assets.
Significant changes in our approach	Compared to the year ended 31 December 2022, we identified a new key audit matter related to the recognition of the DTA as noted in section 5 below; we also did not identify a key audit matter related to IT – Privileged Access which was a key audit matter for prior year audit.

4. Conclusions relating to going concern

In auditing the financial statements, we have concluded that the directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Our evaluation of the directors' assessment of the Group's and the Company's ability to continue to adopt the going concern basis of accounting included:

- understanding the Group's and the Company's controls around budgets and forecasts used for the going concern assessment;
- understanding and evaluating the Group's current and forecast performance and key assumptions including the expected profitability during the going concern assessment period;
- assessing the consistency of assumptions used in the budgets and forecasts with assumptions used in other key estimates;
- testing of clerical accuracy of those budgets and forecasts and assessing the historical accuracy of the budgets and forecasts prepared by management;
- evaluating management's assessment of the Group's capital and liquidity position taking into account the willingness and ability of the ultimate holding company (ICBC Limited) to provide support to the Group and the Company, if needed;
- assessing management's going concern assessment with involvement of our in-house prudential risk specialists to assess management's capital and liquidity projections and the results of management's capital reverse stress testing;
- performing other audit procedures including management enquiries and review of regulatory correspondence to test management's conclusions; and
- assessing the appropriateness of the going concern disclosures in the financial statements in view of FRC guidance.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Group's and the Company's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the directors with respect to going concern are described in the relevant sections of this report.

5. Key audit matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the financial statements of the current period and include the most significant assessed risks of material misstatement (whether or not due to fraud) that we identified. These matters included those which had the greatest effect on: the overall audit strategy; the allocation of resources in the audit; and directing the efforts of the engagement team.

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.

5.1. Valuation of level 3 financial instruments

Key audit matter description	Financial assets and financial liabilities categorised as level 3 are those where significant unobservable inputs have been used in the valuation techniques to measure the fair value. The Group's and the Company's trading and financing activities result in certain positions where prices or inputs are not readily available due to market illiquidity and have limited price transparency. As disclosed in note 24 to the financial statements, as at 31 December 2023, the Group and the Company had trading assets and trading liabilities measured at fair value amounting to \$14,885.0m (2022: \$13,400.9m) and \$12,458.3m (2022: \$12,183.3m) respectively, of which level 3 financial assets and financial liabilities were \$279.6m (2022: \$289.3m) and \$423.1m (2022: \$390.0m) respectively. Unlike other financial instruments whose values or inputs are readily observable and therefore more easily independently corroborated, the valuation of financial instruments classified as level 3 are inherently subjective and often involve the use of proprietary valuation models. Significant judgement is required to derive key model inputs which are not observable in the market place and can involve the selection of proxy financial instruments. This degree of subjectivity may also give rise to potential fraud through management intentionally manipulating fair values or incorporating management bias in determining fair values. Performing our audit procedures to evaluate the appropriateness of these unobservable inputs involved a high degree of auditor's judgement, professionals with specialist skills and knowledge, and an increased extent of testing. The valuation of Level 3 financial instruments is a key source of estimation uncertainty as disclosed in note 25.3 to the financial statements, with a wide range of reasonable outcomes. The financial statements (notes 23 and 25) disclose the sensitivity estimated by the Group and the Company.
How the scope of our audit responded to the key audit matter	We performed the following audit procedures, to address the complexities associated with the valuation of level 3 financial instruments with involvement of our in-house valuation specialists. We obtained an understanding of and tested the Group's relevant controls addressing the risk of material misstatement related to the valuation of level 3 financial instruments including: • model risk management controls, which are designed to review a model's theoretical soundness and the appropriateness of its valuation methodology and calibration techniques developed by business units; • independent price verification controls, which are designed to detect mispricing through independent repricing of transactions by a separate team, and comparison of those independent valuations to the fair values used in the Group's books and records; and • proxy evaluation control, which is designed to evaluate the adequacy of proxies selected by management in cases where observable inputs are not available. We also performed the following substantive procedures on a sample of level 3 financial instruments: • developed independent valuation estimates with the involvement of our in-house valuation specialists, using externally sourced inputs wherever available and independent valuation models; and

	• evaluated the proxies selected by management in the absence of externally sourced inputs, as applicable. We evaluated the fair value levelling of the financial instruments measured at fair value to assess if they are appropriately classified. We also assessed financial statement disclosures related to financial instruments measured at fair value in accordance with relevant IFRSs, including information on the sensitivity of fair value measurements to key inputs and assumptions.
Key observations	We concluded that the valuation of level 3 financial instruments is appropriate.

5.2. Recognition of Day 1 profit or loss (P&L) arising from significant trades

Key audit matter description	Day 1 P&L arises when the fair value of a financial asset or financial liability, at initial recognition, differs from the transaction price. In accordance with the requirements of IFRS 9 *Financial Instruments*, Day 1 P&L is recognised at the initial recognition of a fair value financial asset or financial liability using observable pricing. However, when a fair value measurement includes some unobservable inputs and there is a difference between the transaction price and the valuation at the date of the transaction, IFRS 9 requires elements of the Day 1 P&L to be deferred. Judgement is required to determine how this difference is to be measured and when it is to be recognised. The Group's and the Company's trading and financing activities result in certain trades where prices or inputs are not readily available due to market illiquidity and have limited price transparency. The risk arises where such trades have significant unobservable inputs and therefore the Day 1 P&L does not meet the recognition criteria at initial recognition of the financial asset or financial liability. The level of judgement required increases, particularly, when there are trades involving complex valuation inputs. We therefore identified a key audit matter relating to the risk, whether due to error or fraud, that the Day 1 P&L arising from such trades is recognised in the incorrect period. During 2023, the Group and the Company entered into certain trades giving rise to Day 1 P&L involving judgements due to complex valuation inputs and increased volatility due to external market events. During 2023, Day 1 P&L additions recorded at initial recognition amounted to $46.6m. As disclosed in note 23 to the financial statements, as at 31 December 2023, the Group and the Company held reserves of $37m (31 Dec 2022: $41m) of Day 1 profits i.e. amounts that have not been recognised in revenue during the year but will be recognised in future periods. Accounting policy and information related to key judgement and estimates can be found within note 2 to the financial statements.
How the scope of our audit responded to the key audit matter	We performed the following audit procedures to address the complexities associated with assessment of unobservable inputs giving rise to the material Day 1 P&L from significant trades: We obtained an understanding of and tested the Group's and the Company's relevant controls addressing the risk of material misstatement related to the recognition of Day 1 P&L arising from significant trades including: • controls over the identification and recognition of Day 1 P&L; and • controls over the completeness of Day 1 P&L. We also performed the following substantive procedures for the significant trades giving rise to material Day 1 P&L: • assessing the fair value of significant trades through independent valuation with the involvement of our in-house valuation specialists; • recalculating the Day 1 P&L recognised during 2023 for significant trades; and • for the new significant trades recorded during 2023, assessing the Group's and the Company's judgements of observability and the existence of a liquid two-way market in order to determine whether the Day 1 P&L should be recognised upfront.
Key observations	We concluded that Recognition of Day 1 P&L arising from significant trades is appropriate.

5.3. Recognition of the UK deferred tax asset

Key audit matter description	In accordance with IAS 12 *Income Taxes* a DTA shall be recognised to the extent that it is probable that future taxable profit will be available against which the deductible temporary differences or the carry forward of unused tax losses and unused tax credits, can be utilised. During the current year, the Group recognised a UK DTA of $7.3m (2022: US$nil) arising from unused historical tax losses. The Group forecasted its future taxable profits and recognised the UK DTA based on the next one year's profits to the extent it was probable that those profits would be available to utilise against the unused tax losses. As at 31 December 2023, the Group had gross unused UK tax losses and UK other temporary differences of $767.9m (31 December 2022: $913.8m) against which no DTA was recognised. Due to the magnitude of the unused UK tax losses and other UK temporary differences, and the significant judgement involved in determining an estimate of probable future taxable profits against which these unused tax losses and other temporary differences can be utilised, our audit approach involved a high degree of auditor judgement and an increased extent of testing. Information related to deferred tax asset is disclosed within note 12 to the financial statements. Accounting policy and information related to key judgement and estimates can be found within note 2 to the financial statements.
How the scope of our audit responded to the key audit matter	We performed following procedures to challenge management's judgements involved in the recognition of the UK DTA: • obtained an understanding of controls relevant to the preparation and approval of future profit projections and assessment of the DTA; • obtained the year-on-year budget, challenged management's judgement in determining future profitability and assessed consistency with the budgets and forecasts used for going concern; • challenged the effectiveness of the budgeting process by comparing past budgets to actual results; • performed enquiries of management to understand the haircuts applied to future profit projections to arrive at probable future profits for recognising a DTA; • challenged future profit projections by taking into account the past budgets, past actual results, the impact of events such as Russia-Ukraine conflict and the volatility the Group has experienced in the recent past given the nature of its business; • performed enquiries of management for understanding and challenging the rationale behind the one year look forward period for recognising the DTA compared to normal budgeting cycle and assessed reasonableness of management's conclusion taking into account the profitability for the last four years including 2023; • with the involvement of our tax specialists, assessed management's calculation of DTA in line with IAS 12 and applicable UK tax rules; and • assessed the appropriateness of the relevant financial statement disclosures.
Key observations	We concluded that deferred tax asset is recognised and valued appropriately.

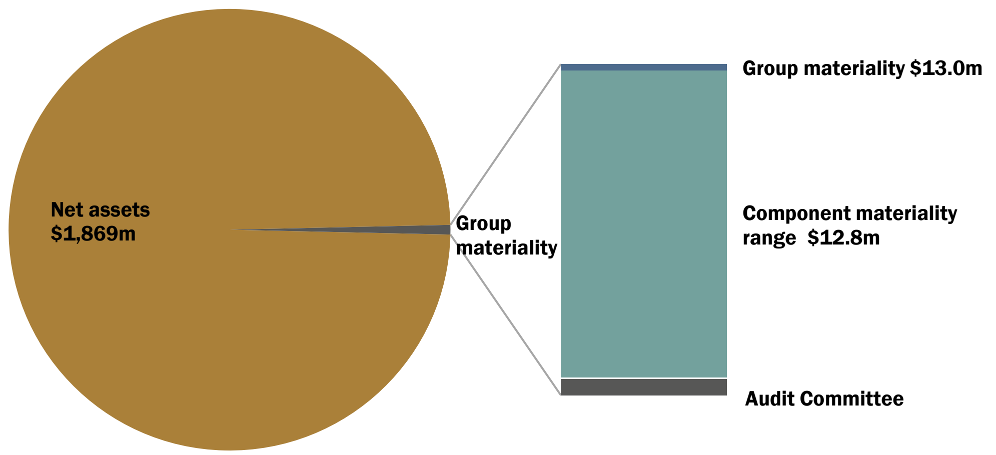
6. Our application of materiality

6.1. Materiality

We define materiality as the magnitude of misstatement in the financial statements that makes it probable that the economic decisions of a reasonably knowledgeable person would be changed or influenced. We use materiality both in planning the scope of our audit work and in evaluating the results of our work.

Based on our professional judgement, we determined materiality for the financial statements as a whole as follows:

	Group financial statements	Company financial statements
Materiality	$13.0m (2022: $11.7m)	$12.8m (2022: $11.1m)
Basis for determining materiality	0.7% of net assets (2022: 0.7% of net assets)	0.7% of net assets (2022: 0.7% of net assets)
Rationale for the benchmark applied	We have considered net assets to be the most appropriate benchmark as the Group is owned by ICBC Limited and Standard Bank Group and is a regulated entity where its capital position is of importance to the key users of the financial statements. These key users include regulators and shareholders. The benchmark selected is also consistent with that used for comparable entities in the Group's industry.	We considered it appropriate to maintain the same benchmark as that for the Group as the Company is the most significant member of the Group and its solo capital position is of importance to the key users of the financial statements, who are common with those for the Group.



6.2. Performance materiality

We set performance materiality at a level lower than materiality to reduce the probability that, in aggregate, uncorrected and undetected misstatements exceed the materiality for the financial statements as a whole.

	Group financial statements	Company financial statements
Performance materiality	70% (2022: 70%) of the Group materiality	70% (2022: 70%) of the Company materiality
Basis and rationale for determining performance materiality	In determining performance materiality, we considered the following factors: a) our risk assessment, including our assessment of the Group's overall control environment; please see section 7.3 where we summarise controls that we relied on for our 2023 audit; b) our increased understanding of the Group's business processes based on the fact that this is our third year of audit; and c) our past experience of the audit, which has indicated a relatively low number of misstatements identified in prior period.	

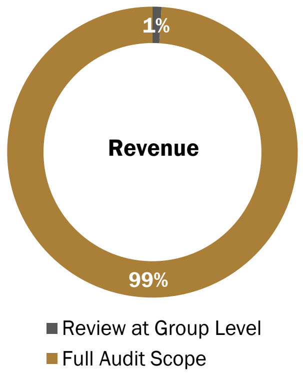
6.3. Error reporting threshold

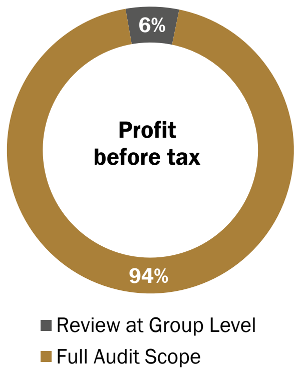
We agreed with the Audit Committee that we would report to the Committee all audit differences in excess of $0.64m (2022: $0.59m), as well as differences below that threshold that, in our view, warranted reporting on qualitative grounds. We also report to the Audit Committee on disclosure matters that we identified when assessing the overall presentation of the financial statements.

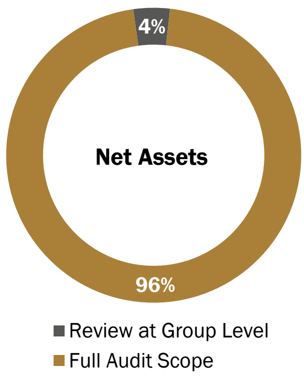
7. An overview of the scope of our audit

7.1. Identification and scoping of components

ICBC Standard Bank Plc specialises in global markets traded products including commodities, fixed income, and currencies, with a focus on frontier and emerging market jurisdictions. The Group's operations are mainly based in London with a branch in Singapore, a wholly owned subsidiary in China, Standard Resources (China) Limited and a wholly owned subsidiary in New York, ICBC Standard NY Holdings Inc. We performed a full scope audit of the London entity, ICBC Standard Bank plc, which accounts for 99% (2022: 99%) of the Group's revenue, 96% (2022: 95%) of the Group's net assets and 94% (2022: 95%) of the Group's profit before tax. In addition, almost all the controls for the Group are performed in London. As regards other components, we have performed analytical review procedures and tested the consolidation at the Group level. All the work was performed by the Group audit team.







7.2. Our consideration of the control environment

In order to test controls, a combination of inquiry, observation and inspection procedures was performed on a sample basis, tailored to the nature and timing of each control. We tested and relied on relevant IT and manual controls related to the following areas of audit, addressing the related risks of material misstatements:

- valuation of financial instruments measured at fair value (please see section 5.1 in relation to valuation of level 3 financial instruments);
- recognition of trading revenue including Day 1 P&L (please see section 5.2 in relation to recognition of Day 1 P&L);
- existence and completeness of physical commodities; and
- existence and completeness of financial instruments.

Where deficiencies in the control environment were identified, our risk assessment procedures included an assessment of those deficiencies to determine the impact on our audit plan. Where relevant, the audit plan was adjusted to mitigate the unaddressed risk. Where we were able to identify and test appropriate mitigating controls over affected financial statement line items, our testing approach remained unchanged.

7.3. Our consideration of climate-related risks

During 2023, the Group performed an assessment of its current business model and the potential opportunities while focusing on transitional opportunities. The Group's sustainability strategy work is integrated into the overall strategy assessment which is performed annually during the planning cycle. During 2023, the Group produced climate related financial disclosures (CFD) in line with the requirements of The Companies (Strategic Report) (Climate Related Financial Disclosures) Regulations 2022 as included on page 14 of Strategic Report as 'Sustainability Report'.

As disclosed on page 29 of the Sustainability Report, the Group has embedded climate related risk into its existing risk framework for the credit risk, market risk, liquidity risk, operational risk and supplier risk. Given the short term nature of its balance sheet, the Group has assessed sustainability-related risks and opportunities as short term (less than on year), medium term (between one year and four years) and long term (greater than four years).

Based on the Group's ongoing assessment of the risks arising from climate change, we have performed our qualitative risk assessment based on enquiries of management and did not identify any additional risk of material misstatement. Also, with the involvement of our in-house specialists, we read the disclosures in the sustainability report to consider whether they are in line with the requirements of the Companies (Strategic Report) CFD regulations 2022 and consistent with our understanding of the financial statements and knowledge obtained during the audit.

8. Other information

The other information comprises the information included in the annual report, other than the financial statements and our auditor's report thereon. The directors are responsible for the other information contained within the annual report.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the course of the audit, or otherwise appears to be materially misstated.

If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact.

We have nothing to report in this regard.

9. Responsibilities of directors

As explained more fully in the directors' responsibilities statement, the directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the directors determine 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, the directors are responsible for assessing the Group's and the 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 the directors either intend to liquidate the Group or the Company or to cease operations, or have no realistic alternative but to do so.

10. Auditor's 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 auditor's 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 ISAs (UK) 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.

A further description of our responsibilities for the audit of the financial statements is located on the FRC's website at: www.frc.org.uk/auditorsresponsibilities. This description forms part of our auditor's report.

11. Extent to which the audit was considered capable of detecting irregularities, including fraud

Irregularities, including fraud, are instances of non-compliance with laws and regulations. We design procedures in line with our responsibilities, outlined above, to detect material misstatements in respect of irregularities, including fraud. The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below.

11.1. Identifying and assessing potential risks related to irregularities

In identifying and assessing risks of material misstatement in respect of irregularities, including fraud and non-compliance with laws and regulations, we considered the following:

- the nature of the industry and sector, control environment and business performance including the design of the Group's and the Company's remuneration policies, key drivers for directors' remuneration, bonus levels and performance targets;
- results of our enquiries of management, internal audit, the compliance function and the directors and the Audit Committee about their own identification and assessment of the risks of irregularities, including those that are specific to the Group's sector;
- any matters we identified having obtained and reviewed the Group's documentation of their policies and procedures relating to:
  - identifying, evaluating and complying with laws and regulations and whether they were aware of any instances of non-compliance;
  - detecting and responding to the risks of fraud and whether they have knowledge of any actual, suspected or alleged fraud;
  - the internal controls established to mitigate risks of fraud or non-compliance with laws and regulations;
- the matters discussed among the audit engagement team and relevant internal specialists, including tax, valuations, IT and prudential risks specialists regarding how and where fraud might occur in the financial statements and any potential indicators of fraud.

As a result of these procedures, we considered the opportunities and incentives that may exist within the organisation for fraud and identified the greatest potential for fraud in the following areas: (1) valuation of level 3 financial instruments and (2) recognition of Day 1 P&L arising from significant trades. In common with all audits under ISAs (UK), we are also required to perform specific procedures to respond to the risk of management override.

We also obtained an understanding of the legal and regulatory framework that the Group operates in, focusing on provisions of those laws and regulations that had a direct effect on the determination of material amounts and disclosures in the financial statements. The key laws and regulations we considered in this context included the UK Companies Act.

In addition, we considered provisions of other laws and regulations that do not have a direct effect on the financial statements but compliance with which may be fundamental to the Group's ability to operate or to avoid a material penalty. These included the Group's operating licence and regulatory solvency requirements.

11.2. Audit response to risks identified

As a result of performing the above, we identified valuation of level 3 financial instruments and recognition of Day 1 P&L arising from significant trades as key audit matters related to the potential risk of fraud. The key audit matters section of our report explains the matters in more detail and also describes the specific procedures we performed in response to those key audit matters.

In addition to the above, our procedures to respond to the risks identified included the following:

- reviewing the financial statement disclosures and testing to supporting documentation to assess compliance with provisions of relevant laws and regulations described as having a direct effect on the financial statements;
- enquiring of management, the Audit Committee and in-house and external legal counsel concerning actual and potential litigation and claims;
- performing analytical procedures to identify any unusual or unexpected relationships that may indicate risks of material misstatement due to fraud;
- reading minutes of meetings of those charged with governance, reviewing internal audit reports and reviewing correspondence with HMRC, PRA and FCA; and
- in addressing the risk of fraud through management override of controls, testing the appropriateness of journal entries and other adjustments; assessing whether the judgements made in making accounting estimates are indicative of a potential bias; and evaluating the business rationale of any significant transactions that are unusual or outside the normal course of business.

We also communicated relevant identified laws and regulations and potential fraud risks to all engagement team members including internal specialists and remained alert to any indications of fraud or non-compliance with laws and regulations throughout the audit.

Report on other legal and regulatory requirements

12. Opinions on other matters prescribed by the Companies Act 2006

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the strategic report and the directors' report for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the strategic report and the directors' report have been prepared in accordance with applicable legal requirements.

In the light of the knowledge and understanding of the Group and the Company and their environment obtained in the course of the audit, we have not identified any material misstatements in the strategic report or the directors' report.

13. Opinion on other matter prescribed by the Capital Requirements (Country-by-Country Reporting) Regulations 2013

In our opinion the information given in note 1 to the financial statements for the financial year ended 31 December 2023 has been properly prepared, in all material respects, in accordance with the Capital Requirements (Country-by Country Reporting) Regulations 2013.

14. Matters on which we are required to report by exception

14.1. Adequacy of explanations received and accounting records

Under the Companies Act 2006 we are required to report to you if, in our opinion:

- we have not received all the information and explanations we require for our audit; or
- adequate accounting records have not been kept by the parent company, or returns adequate for our audit have not been received from branches not visited by us; or
- the Company financial statements are not in agreement with the accounting records and returns.

We have nothing to report in respect of these matters.

14.2. Directors' remuneration

Under the Companies Act 2006 we are also required to report if in our opinion certain disclosures of directors' remuneration have not been made.

We have nothing to report in respect of this matter.

15. Other matters which we are required to address

15.1. Auditor tenure

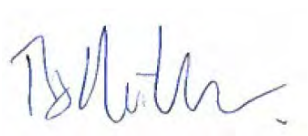
Following the recommendation of the Audit Committee, we were appointed by the shareholders on 26 April 2021 to audit the financial statements for the year ending 31 December 2021 and subsequent financial periods. The period of total uninterrupted engagement including previous renewals and reappointments of the firm is 3 years, covering the years ended 31 December 2021 to 31 December 2023.

15.2. Consistency of the audit report with the additional report to the Audit Committee

Our audit opinion is consistent with the additional report to the Audit Committee we are required to provide in accordance with ISAs (UK).

16. Use of our report

This report is made solely to the Company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the Company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members as a body, for our audit work, for this report, or for the opinions we have formed.



Tom Millar, FCA (Senior statutory auditor)
For and on behalf of Deloitte LLP
Statutory Auditor

London, United Kingdom
29 February 2024

7. Consolidated balance sheet

at 31 December 2023

	Note	2023 $m	2022 $m
Assets			
Cash and balances with central banks	3	**2,635.9**	4,856.1
Due from banks and other financial institutions	4	**2,248.4**	2,182.3
Financial assets held for trading	5	**1,278.5**	702.7
Non-trading financial assets at fair value through profit or loss	6	**2,856.6**	2,193.7
Derivative financial assets	7	**3,383.2**	4,968.0
Reverse repurchase agreements	8	**2,936.0**	2,614.6
Loans and advances to customers	9	**771.3**	818.6
Financial investments	10	**2,052.8**	1,293.4
Property and equipment	11	**66.9**	34.6
Current tax assets		**11.8**	5.5
Deferred tax assets	12	**8.0**	0.6
Other assets	13	**4,997.7**	2,957.2
Non-financial assets held for trading - Commodities inventory		**4,792.2**	2,772.2
Other		**205.5**	185.0
Total assets		**23,247.1**	22,627.3
Liabilities and equity			
Liabilities		**21,376.2**	20,945.3
Financial liabilities held for trading	15	**1,634.7**	1,295.2
Non-trading financial liabilities at fair value through profit or loss	16	**3,744.0**	2,951.2
Derivative financial liabilities	7	**3,782.3**	5,352.8
Due to banks and other financial institutions	17	**6,553.2**	6,221.9
Repurchase agreements	18	**853.1**	530.1
Due to customers	19	**1,077.1**	1,736.5
Current tax liabilities		**2.4**	3.5
Subordinated debt	20	**247.6**	245.4
Other liabilities	21	**3,481.8**	2,608.7
Precious metal payables		**3,140.6**	2,395.5
Other		**341.2**	213.2
Equity			
Equity attributable to ordinary shareholders		**1,870.9**	1,682.0
Share capital	27	**1,083.5**	1,083.5
Other equity instruments	28	**160.0**	160.0
Reserves		**627.4**	438.5
Total liabilities and equity		**23,247.1**	22,627.3

The accounting policies and notes on pages 69 to 166 should be read as part of the financial statements.

Approved by the Board of Directors and signed on its behalf on 29 February 2024.

W Wang, Chief Executive

A W Simmonds, Chairman

8. Consolidated income statement

for the year ended 31 December 2023

	Note	2023 $m	2022 $m
Net interest income		**153.9**	98.5
Interest income	30.1	**524.7**	254.8
Interest expense	30.2	**(370.8)**	(156.3)
Non-interest revenue	30.3	**404.1**	711.4
Net fees and commission		**38.6**	25.4
Fees and commission income		**65.7**	43.2
Fees and commission expenses		**(27.1)**	(17.8)
Net trading revenue		**314.0**	400.6
Net gain on non-trading financial assets and liabilities at fair value through profit or loss		**51.5**	51.7
Recoveries on commodity inventory intermediation	30.4	**-**	233.7
Total operating income		**558.0**	809.9
Credit impairment recoveries / (charges)	30.5	**50.2**	(60.8)
Income after credit impairments		**608.2**	749.1
Operating expenses		**(397.6)**	(373.6)
Staff costs	30.6	**(247.8)**	(223.9)
Other operating expenses	30.7	**(145.9)**	(147.9)
Indirect taxation	30.8	**(3.9)**	(1.8)
Profit before taxation		**210.6**	375.5
Income tax charge	31	**(23.5)**	(58.4)
Profit attributable to equity shareholders		**187.1**	317.1

The accounting policies and notes on pages 69 to 166 should be read as part of the financial statements.

9. Consolidated statement of comprehensive income

for the year ended 31 December 2023

	2023 $m	2022 $m
Profit attributable to equity shareholders	**187.1**	317.1
Other comprehensive income:		
Items that may be reclassified subsequently to profit or loss[1]		
Foreign currency translation reserve	**(0.7)**	(2.6)
Cash flow hedging reserve	**13.5**	13.1
Effective portion of changes in fair value	**18.3**	(7.5)
Net amount transferred to profit or loss	**(4.8)**	20.6
Changes in fair value of debt instruments measured at FVOCI	**0.9**	(2.5)
Items that will not be reclassified subsequently to profit or loss[1]		
Gains/(losses) attributable to own credit risk	**0.3**	(0.9)
Other comprehensive income for the year	**14.0**	7.1
Total comprehensive gains attributable to equity shareholders	**201.1**	324.2

[1] No income tax is recognised in other comprehensive income.

10. Consolidated statement of changes in shareholders' equity

for the year ended 31 December 2023

	Ordinary share capital and share premium $m	Other equity instruments $m	Cash flow hedging reserve $m	FVOCI reserve $m	Foreign currency translation reserve $m	Net investment hedge reserve[1] $m	Own credit reserve $m	Retained earnings $m	Total equity[2] $m
Balance at 1 January 2022	1,083.5	160.0	(5.1)	1.5	0.1	(1.7)	(0.4)	132.1	1,370.0
Total comprehensive gains / (losses) for the year	-	-	13.1	(2.5)	(2.6)	-	(0.9)	317.1	324.2
Coupon payment on other equity instruments	-	-	-	-	-	-	-	(12.2)	(12.2)
Balance at 31 December 2022	1,083.5	160.0	8.0	(1.0)	(2.5)	(1.7)	(1.3)	437.0	1,682.0
Balance at 1 January 2023	**1,083.5**	**160.0**	**8.0**	**(1.0)**	**(2.5)**	**(1.7)**	**(1.3)**	**437.0**	**1,682.0**
Total comprehensive gains / (losses) for the year	-	-	**13.5**	**0.9**	**(0.7)**	-	**0.3**	**187.1**	**201.1**
Coupon payment on other equity instruments	-	-	-	-	-	-	-	**(12.2)**	**(12.2)**
Balance at 31 December 2023	**1,083.5**	**160.0**	**21.5**	**(0.1)**	**(3.2)**	**(1.7)**	**(1.0)**	**611.9**	**1,870.9**

[1] No net investment hedges were entered into during 2022 or 2023.

[2] Equity attributable to ordinary shareholders excludes other equity instruments and is US$1,710.9 million at 31 December 2023 (2022: US$1,522.0 million).

11. Consolidated statement of cash flows

for the year ended 31 December 2023

	Note	2023 $m	2022 $m
Cash flows used in operating activities			
Profit before taxation		**210.6**	375.5
Adjusted for:			
Net interest income[1]		**(153.9)**	(98.5)
Amortisation of intangible assets		**9.6**	11.0
Depreciation of property and equipment		**17.5**	18.2
Non-cash flow movements on fair value hedges		**(2.2)**	0.9
Incentive charges		**72.9**	64.6
Net credit impairment (recoveries) / charges		**(50.2)**	60.8
Provisions for leave pay		**0.3**	(1.4)
		104.6	431.1
Changes in operating funds		**(2,387.8)**	(1,608.4)
(Increase) / decrease in income-earning assets	32.1	**(4,382.4)**	2,981.5
Increase / (decrease) in interest bearing and non-interest bearing liabilities	32.2	**1,994.6**	(4,589.9)
Interest received		**505.7**	244.1
Interest paid		**(336.2)**	(149.5)
Corporation and withholding tax paid	32.3	**(37.0)**	(54.6)
Cash flows used in operating activities		**(2,150.7)**	(1,137.3)
Cash flows used in investing activities			
Capital expenditure on intangible assets		**(5.1)**	(11.4)
Capital expenditure on property and equipment		**(1.8)**	(4.1)
Cash flows used in investing activities		**(6.9)**	(15.5)
Cash flows used in financing activities			
Proceeds from issuance of subordinated floating rate notes	20	**-**	150.0
Repayment of subordinated floating rate notes	20	**-**	(150.0)
Coupon payment on other equity instruments	28	**(12.2)**	(12.2)
Principal payments on leasehold liabilities		**(10.4)**	(9.7)
Cash flows used in financing activities		**(22.6)**	(21.9)
Net decrease in cash and cash equivalents		**(2,180.2)**	(1,174.7)
Effects of exchange rate changes on cash and cash equivalents		**(65.8)**	42.6
Cash and cash equivalents at beginning of the year	32.4	**4,990.4**	6,122.5
Cash and cash equivalents at end of the year	32.4	**2,744.4**	4,990.4

[1] Includes interest paid on subordinated debt instruments and lease liabilities

12. Company balance sheet

at 31 December 2023

	Note	2023 $m	2022 $m
Assets			
Cash and balances with central banks	3	**2,635.9**	4,856.1
Due from banks and other financial institutions	4	**2,187.3**	2,121.1
Financial assets held for trading	5	**1,278.5**	702.7
Non-trading financial assets at fair value through profit or loss	6	**2,856.6**	2,193.7
Derivative financial assets	7	**3,383.2**	4,968.0
Reverse repurchase agreements	8	**2,936.0**	2,614.6
Loans and advances to customers	9	**771.3**	818.6
Financial investments	10	**2,052.8**	1,293.4
Property and equipment	11	**63.6**	28.5
Current tax assets		**11.4**	5.4
Deferred tax assets	12	**7.3**	-
Other assets	13	**4,997.1**	2,957.0
Non-financial assets held for trading - Commodities inventory		**4,792.2**	2,772.2
Other		**204.9**	184.8
Investment in group companies	14	**29.5**	29.5
Total assets		**23,210.5**	22,588.6
Liabilities and equity			
Liabilities		**21,369.2**	20,934.6
Financial liabilities held for trading	15	**1,634.7**	1,295.2
Non-trading financial liabilities at fair value through profit or loss	16	**3,744.0**	2,951.2
Derivative financial liabilities	7	**3,782.3**	5,352.8
Due to banks and other financial institutions	17	**6,553.2**	6,221.9
Repurchase agreements	18	**853.1**	530.1
Due to customers	19	**1,077.1**	1,736.5
Current tax liabilities		**2.3**	2.7
Subordinated debt	20	**247.6**	245.4
Other liabilities	21	**3,474.9**	2,598.8
Precious metal payables		**3,140.6**	2,395.5
Other		**334.3**	203.3
Equity			
Equity attributable to ordinary shareholders		**1,841.3**	1,654.0
Share capital	27	**1,083.5**	1,083.5
Other equity instruments	28	**160.0**	160.0
Reserves[1]		**597.8**	410.5
Total liabilities and equity		**23,210.5**	22,588.6

[1] The parent company recorded a profit after tax for the year of $184.8 million (2022: $311.2 million) (see note 30.11).

The accounting policies and notes on pages 69 to 166 should be read as part of the financial statements.

Approved by the Board of Directors and signed on its behalf on 29 February 2024.

W Wang, Chief Executive

A W Simmonds, Chairman

13. Company statement of changes in shareholders' equity

for the year ended 31 December 2023

	Ordinary share capital and share premium $m	Other equity instruments $m	Cash flow hedging reserve $m	FVOCI reserve $m	Own credit reserve $m	Retained earnings $m	Total equity $m
Balance at 1 January 2022	1,083.5	160.0	(5.1)	1.5	(0.4)	105.8	1,345.3
Total comprehensive gains / (losses) for the year	-	-	13.1	(2.5)	(0.9)	311.2	320.9
Coupon payment on other equity instruments	-	-	-	-	-	(12.2)	(12.2)
Balance at 31 December 2022	1,083.5	160.0	8.0	(1.0)	(1.3)	404.8	1,654.0
Balance at 1 January 2023	**1,083.5**	**160.0**	**8.0**	**(1.0)**	**(1.3)**	**404.8**	**1,654.0**
Total comprehensive gains / (losses) for the year	-	-	**13.5**	**0.9**	**0.3**	**184.8**	**199.5**
Coupon payment on other equity instruments	-	-	-	-	-	**(12.2)**	**(12.2)**
Balance at 31 December 2023	**1,083.5**	**160.0**	**21.5**	**(0.1)**	**(1.0)**	**577.4**	**1,841.3**

14. Company statement of cash flows

for the year ended 31 December 2023

	Note	2023 $m	2022 $m
Cash flows used in operating activities			
Profit before taxation		**207.5**	367.9
Adjusted for:			
Net interest income[1]		**(153.3)**	(98.0)
Amortisation of intangible assets		**9.6**	11.0
Depreciation of property and equipment		**14.7**	15.4
Non-cash flow movements on fair value hedges		**(2.2)**	0.9
Incentive charges		**67.2**	59.5
Net credit impairment (recoveries) / charges		**(50.2)**	60.8
Provisions for leave pay		**0.1**	(1.4)
		93.4	416.1
Changes in operating funds		**(2,395.8)**	(1,597.5)
(Increase) / decrease in income-earning assets	32.1	**(4,399.3)**	2,984.5
Increase / (decrease) in interest bearing and non-interest bearing liabilities	32.2	**2,003.5**	(4,582.0)
Interest received		**504.9**	243.3
Interest paid		**(336.0)**	(149.1)
Corporation and withholding tax paid	32.3	**(35.1)**	(54.0)
Cash flows used in operating activities		**(2,168.6)**	(1,141.2)
Cash flows used in investing activities			
Capital expenditure on intangible assets		**(5.1)**	(11.4)
Capital expenditure on property and equipment		**(1.8)**	(3.7)
Cash flows used in investing activities		**(6.9)**	(15.1)
Cash flows used in financing activities			
Proceeds from issuance of subordinated floating rate notes	20	**-**	150.0
Repayment of subordinated floating rate notes	20	**-**	(150.0)
Coupon payment on other equity instruments	28	**(12.2)**	(12.2)
Principal payments on leasehold liabilities		**(8.2)**	(7.5)
Cash flows used in financing activities		**(20.4)**	(19.7)
Net decrease in cash and cash equivalents		**(2,195.9)**	(1,176.0)
Effects of exchange rate changes on cash and cash equivalents		**(67.1)**	44.2
Cash and cash equivalents at beginning of the year	32.4	**4,982.7**	6,114.5
Cash and cash equivalents at end of the year	32.4	**2,719.7**	4,982.7

[1] Includes interest paid on subordinated debt instruments and lease liabilities

15. Significant accounting policies

The principal accounting policies applied in the presentation of the annual financial statements are set out below.

1. Basis of preparation

Both the Company financial statements and the consolidated financial statements have been prepared in accordance with international accounting standards in conformity with the requirements of the Companies Act 2006 and in accordance with International Financial Reporting Standards (IFRSs) and interpretations (IFRICs) as issued by the IASB and adopted in the United Kingdom (UK). In publishing the Company financial statements here together with the ICBC Standard Bank Plc consolidated (Group) financial statements, the Company has taken advantage of the exemption in Section 408 of the Companies Act 2006 not to present its separate income statement and related notes that form part of these financial statements.

The annual financial statements have been prepared under the historical cost convention, except for certain financial instruments, and certain non-financial assets and liabilities measured at fair value, as further explained in the respective accounting policies below.

Going concern

The financial statements have been prepared on a going concern basis as the directors are satisfied that the Company and Group have the resources to continue in business for a period of at least 12 months from approval of the financial statements. In making this assessment, the directors have considered a wide range of information relating to present and future conditions, the business plan for the next and subsequent three years, which includes the impact of forthcoming regulatory changes, and the ability and willingness of the shareholders to provide support as and when required. This assessment also considered forecasts prepared by the Group, which incorporated a combined stress on cash flows and counterbalancing capacity to stress test impacts on capital requirements and liquidity.

The Company and Group maintain a capital and liquidity position in excess of prudential requirements. The demonstrable ongoing support by the controlling shareholder is an important aspect supporting the going concern assessment. Industrial and Commercial Bank of China Limited (ICBC) has issued a statement of support in favour of the Company confirming its position as a long-term investment and as an integral part of the ICBC Group's overall operational strategy, which remains valid until ICBC ceases to be the controlling shareholder. ICBC Group's goal is to develop ICBCS into a major link in its international network, and therefore, it undertakes to support the Group's development and growth. ICBC confirms that it intends to financially support the Group in ensuring that it meets all financial obligations as they fall due, including the maintenance of a minimum capital adequacy level. Specifically, ICBC intends to provide funding and capital support to the Group and commits its intention to subscribe for certain 'qualifying instruments' as and when ICBC receives written notice from the Group that its capital and reserve funds amount to (or will foreseeably in the near term amount to) less than the minimum required amount of capital and reserve funds as determined in accordance with the rules and regulations of the Prudential Regulation Authority (or its successor).

Based on the above considerations, the directors have a reasonable expectation that the Company and Group have adequate resources to continue in operational existence for a period of least 12 months from the date of approval of these financial statements.

Changes in accounting policies

Except as noted below, the accounting policies adopted are consistent with those of the previous year.

International Tax Reform – Pillar Two Model Rules (Amendments to IAS 12)

The Group has adopted *International Tax Reform – Pillar Two Model Rules (Amendments to IAS 12)* upon their release on 23 May 2023. The amendments provide a temporary mandatory exception from deferred tax accounting for the top-up tax introduced under the Pillar Two Model Rules, which is effective immediately, and requires new disclosures about the Pillar Two exposure (see Note 31).

The mandatory exception applies retrospectively. However, because the legislation introducing a global minimum top-up tax in the UK, which is the only jurisdiction in which the Group operates where such tax will apply, is effective for accounting periods commencing on or after 31 December 2023, no related deferred tax was recognised at that date and so the retrospective application of the amendments to IAS 12 in respect of the Pillar Two Model Rules has no impact on the Group's consolidated annual financial statements for the period then ended.

2. Basis of consolidation

The Group consolidates the annual financial statements of investees which it controls. The Group controls an investee when it has:

- power over the investee;
- exposure, or rights, to variable returns from its involvement with the investee; and
- the ability to use its power to affect the amount of the returns from its involvement with the investee.

The annual financial statements of the investee are consolidated from the date on which the Group acquires control up to the date that control ceases. Control is assessed on a continuous basis.

Intragroup transactions and balances, and any unrealised gains and losses arising from intragroup transactions (except for foreign currency transaction gains and losses), are eliminated on consolidation. Unrealised losses are eliminated in the same manner as unrealised gains, but only to the extent that there is no evidence of impairment.

The accounting policies of subsidiaries that are consolidated by the Group conform to these policies.

Investments in subsidiaries are accounted for at cost less accumulated impairment losses (where applicable) in the separate financial statements. The carrying amounts of these investments are reviewed annually and impaired when necessary.

3. Foreign currency translations

Functional and presentation currency

Items included in the financial statements of each of the Group's entities are measured using the currency of the primary economic environment in which the entity operates (the functional currency). The consolidated and separate financial statements are presented in US dollars, which is the Group's presentation currency and Company's functional currency, and all amounts are stated in millions of dollars (US$ million), unless otherwise indicated.

Group entities

The results and financial position of all foreign operations that have a functional currency different from the Group's presentation currency are translated into the Group's presentation currency as follows:

- assets and liabilities are translated at the closing rate on the reporting date;
- income and expenses are translated at average exchange rates for the month, to the extent that such average rates approximate actual rates, otherwise income and expenses are translated at the exchange rates ruling at the dates of the transactions.

All resulting foreign exchange differences are recognised in other comprehensive income (OCI) and accumulated in a separate component of equity, the foreign currency translation reserve.

When a foreign operation is disposed of or liquidated, the cumulative amount in the foreign currency translation reserve related to that foreign operation is reclassified to profit or loss as part of the gain or loss on disposal or liquidation.

Transactions and balances

Foreign currency transactions are translated into the respective functional currencies of Group entities at the exchange rates prevailing at the date of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation of monetary assets and liabilities denominated in foreign currencies at year end exchange rates are recognised in the income statement, except when recognised in OCI as a qualifying cash flow hedge. Non-monetary assets and liabilities denominated in foreign currencies that are measured at historical cost are translated into the appropriate functional currency using the exchange rate at the transaction date, and those measured at fair value are translated at the exchange rate at the date the fair value was determined. Exchange rate differences on non-monetary items are included in the income statement or OCI depending on where the gain or loss on the underlying item is recognised.

The Group hedges the variability in cash flows attributable to foreign exchange risk on a portion of its budgeted sterling denominated expense base and applies cash flow hedge accounting to those highly probable forecast expenses. A portion of the gains/losses recognised on the hedging derivatives is recycled from OCI to profit or loss in the period in which the related costs are recognised in the income statement. The hedging instruments are executed over a period of time at a range of different exchange rates and the unhedged portion of the budgeted sterling expense base is translated at spot exchange rates in accordance with the policy set out above. In order to provide consistency, the sterling based expenses in the individual line items are translated at a budget planning rate. Any differences between the costs translated at the budget planning rate and the rates achieved through hedging and spot translation of the sterling based costs are recognised in other expenses in the income statement.

Foreign exchange gains and losses on debt securities classified as fair value through OCI, and debt and equity securities classified as fair value through profit or loss are reported in profit or loss.

4. Cash and cash equivalents

Cash and cash equivalents disclosed in the statement of cash flows consist of unrestricted cash balances with central banks, together with other highly liquid short-term placements with deposit-taking institutions available on demand. These balances are subject to insignificant changes in fair value and are reported at amortised cost.

5. Financial instruments

Initial recognition and measurement

Financial instruments include all financial assets and financial liabilities. These instruments are typically held for liquidity, investment, trading or hedging purposes. All financial instruments are initially recognised at fair value plus or minus transaction costs that are directly attributable to the acquisition or issue of the financial asset or financial liability, except those carried at fair value through profit or loss where transaction costs are recognised immediately in profit or loss.

The Group initially recognises loans and advances, repurchase and reverse repurchase agreements at amortised cost, deposits, and subordinated liabilities on the date on which they are originated. All other financial instruments, including regular way purchases and sales of financial assets, are recognised on the trade date, being the date that the Group becomes a party to the contractual provisions of the instrument.

Subsequent measurement

Subsequent to initial measurement, financial instruments are measured either at fair value or amortised cost using the effective interest method, depending on their classifications as follows:

Financial assets

IFRS 9 Financial Instruments (IFRS 9) has three classification categories for financial assets as follows:

i Amortised cost;

ii Fair value through other comprehensive income (FVOCI); and

iii Fair value through profit or loss (FVTPL).

The classification is based on the business model under which the financial asset is managed and the terms of its contractual cash flows, in particular, whether they represent solely payments of principal and interest (SPPI) on the principal amount outstanding.

Business model assessment
The Group assesses the objective of a business model in which an asset is held at a portfolio level as that best reflects the way the business is managed and information is provided to management. In determining the business model, all relevant evidence that is available at the date of the assessment is used, including:

i How the performance of the portfolio is evaluated and reported to the Group's key management personnel;

ii Risks that affect the performance of the business model (and the financial assets held within it) and, in particular, how those risks are managed;

iii How managers of the business are compensated (for example, whether compensation is based on the fair value of the assets managed or the contractual cash flows collected);

iv The stated policies and objectives for the portfolio and the operation of those policies in practice. In particular, whether management's strategy focuses on earning contractual interest revenue, maintaining a particular interest rate profile, matching the duration of the financial assets to the duration of the liabilities that are funding those assets or realising cash flows through the sale of the assets; and

v The frequency, volume and timing of sales in prior periods, the reasons for such sales and expectations about future sales activity.

SPPI assessment

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

- Contingent events that would change the amount and timing of cash flows;
- Leverage features;
- Prepayment and extension terms;
- Terms that limit the Group's claim to cash flows from specified assets (e.g. non-recourse asset arrangements); and
- Features that modify consideration of the time value of money, e.g. periodic resets of interest rates.

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

The Group has applied the following policies for the classification categories under IFRS 9:

Amortised cost

A financial asset is measured at amortised cost if both of the following conditions are met:

i The financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows; and

ii The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

Fair value through other comprehensive income

A financial asset is measured at FVOCI if both of the following conditions are met:

i The financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets; and

ii The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

For debt securities measured at FVOCI, gains and losses are recognised in OCI, except for the following, which are recognised in profit or loss in the same manner as for financial assets measured at amortised cost:

- Interest income using the effective interest method;
- Expected credit losses and reversals; and
- Foreign exchange gains/losses.

When debt securities measured at FVOCI are derecognised, the cumulative gain or loss previously recognised in OCI is reclassified to current period profit or loss.

Fair value through profit or loss
All financial assets that are not measured at amortised cost or FVOCI are measured at FVTPL.

The Group may also irrevocably elect to designate a financial asset as measured at FVTPL on initial recognition if doing so eliminates or significantly reduces an accounting mismatch, which would otherwise arise.

Financial assets at FVTPL comprise:

- Items held for trading;
- Items that are managed, and whose performance is evaluated, on a fair value basis;
- Derivative instruments;
- Items specifically designated as FVTPL on initial recognition; and
- Debt instruments with contractual terms that do not represent solely payments of principal and interest on the principal amount outstanding.

Financial assets and liabilities held for trading are those assets and liabilities that the Group acquires or incurs principally for the purpose of selling or repurchasing in the near term, or holds as part of a portfolio of identified financial instruments that are managed together and for which there is evidence of a recent actual pattern of short-term profit-taking. Derivatives are carried on the balance sheet as assets when their fair value is positive and as liabilities when their fair value is negative.

Financial liabilities

The Group classifies its financial liabilities, other than financial guarantees and loan commitments, as measured at amortised cost or FVTPL.

Financial liabilities that are neither held-for-trading nor designated at fair value through profit or loss are measured at amortised cost using the effective interest method.

A financial liability may be designated at fair value through profit or loss if:

i It eliminates or significantly reduces an accounting mismatch;

ii A host contract contains one or more embedded derivatives; or

iii If a group of financial liabilities or financial assets and liabilities is managed and their performance is evaluated on a fair value basis in accordance with a documented risk management or investment strategy.

Where a financial liability is designated at fair value through profit or loss, the movement in fair value attributable to changes in the Group's own credit quality is presented separately in OCI with no subsequent reclassification to the income statement, unless the treatment of the effects of changes in the liability's credit risk would create or enlarge an accounting mismatch in profit or loss, in which case all gains or losses on the liability (including the effects of changes in the credit risk of that liability) are recorded in profit or loss.

Reclassification of financial instruments

Financial assets are not reclassified subsequent to their initial recognition, except in the period after the Group changes its business model for managing those financial assets. There have been no reclassifications of financial assets in the current or prior year.

Financial liabilities are not reclassified subsequent to their initial recognition.

Fair value

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date (i.e. an exit price). The fair value of financial instruments is generally measured on an individual basis. However, in cases where the Group manages a group of financial assets and liabilities according to its net market or credit risk exposure, the fair value of the group of financial instruments is measured on a net basis but the underlying financial assets and liabilities are presented separately in the financial statements, unless they satisfy the IFRS offsetting criteria.

The fair value of a financial instrument on initial recognition is generally its transaction price, that is, the fair value of the consideration paid or received. However, sometimes, the fair value will be based on other observable current market transactions in the same instrument, without modification or repackaging, or on valuation techniques such as discounted cash flow models or option pricing models whose variables include only data from observable markets.

When such valuation models with observable market data for all significant inputs or comparison with other observable current market transactions in the same instrument indicate that the fair value differs from the transaction price, this initial difference, commonly referred to as day one profit or loss, is recognised in profit or loss immediately.

If significant unobservable market data is used as inputs to the valuation models or where the fair value of the financial instrument is not evidenced by comparison with other observable current market transactions in the same instrument, the resulting difference between the transaction price and the model value is deferred.

The timing of recognition of deferred day one profit or loss is determined individually. It is either amortised over the life of the transaction, deferred until the instrument's fair value can be determined using market observable inputs, or realised through settlement, depending on the nature of the instrument and availability of market observable inputs.

Subsequent to initial recognition, the fair values of financial assets and liabilities are based on quoted market prices or dealer price quotations for financial instruments traded in active markets and where those quoted prices represent fair value at the measurement date. If the market for a financial asset is not active or the instrument is unlisted, the fair value is determined using other applicable valuation techniques. These include the use of recent arm's-length transactions, discounted cash flow analyses, option pricing models and other valuation techniques commonly used by market participants. Where discounted cash flow analyses are used, estimated future cash flows are based on management's best estimates and a market related discount rate at the reporting date for a financial asset or liability with similar terms and conditions. The fair values of derivative financial instruments are adjusted where appropriate to reflect credit risk (via credit valuation adjustments (CVAs), debit valuation adjustments (DVAs) and funding valuation adjustments (FVAs)), market liquidity and other risks.

Impairment of financial assets

At each reporting date, the Group recognises an allowance for expected credit losses (ECL) for the following financial instruments:

- All financial assets measured at amortised cost;
- Debt instruments measured at FVOCI;
- Certain loan commitments issued; and
- Certain financial guarantee contracts issued.

ECLs are an unbiased probability-weighted estimate of credit losses (i.e. the present value of all cash shortfalls) over the expected life of the financial instrument determined by evaluating a range of possible outcomes and future economic conditions. Cash shortfalls represent the difference between the cash flows due to the Group in accordance with the contractual terms of an instrument and the cash flows it expects to receive, including the recoverable amount of any collateral and other credit enhancements that are integral to the contractual terms of the instrument, that may result from foreclosure less costs of obtaining and selling the collateral, whether or not foreclosure is probable.

At initial recognition, an impairment allowance (or provision in the case of loan commitments and financial guarantees) is required for the portion of the lifetime ECL (see below) resulting from default events that are possible within 12 months after the reporting date (12 month ECL).

The Group subsequently applies a three-stage approach to measuring ECLs based on the change in credit risk since initial recognition, as follows:

- Stage 1: For exposures where there has not been a significant increase in credit risk since initial recognition and that are not credit impaired upon purchase or origination, the 12 month ECL is recognised. For instruments in stage 1, interest revenue is calculated by applying the effective interest rate to the gross carrying amount of the instrument.
- Stage 2: For exposures where there has been a significant increase in credit risk since initial recognition but that are not credit impaired, an allowance (or provision) is required for ECL resulting from all possible default events over the expected life of the financial instrument (lifetime ECL). For instruments in stage 2, interest revenue continues to be calculated by applying the effective interest rate to the gross carrying amount of the instrument.
- Stage 3: For exposures where there is objective evidence of impairment, which are considered to be in default or otherwise credit impaired, an allowance (or provision) for lifetime ECL is also required. However, for instruments in stage 3, interest revenue is calculated by applying the effective interest rate to the amortised cost (net of the allowance or provision) rather than the gross carrying amount of the instrument.

At each reporting date, the Group assesses whether there has been a significant increase in credit risk for exposures since initial recognition by comparing the risk of default occurring over the expected life of the instrument between the reporting date and the date of initial recognition. The assessment of whether an instrument is in stage 1 or stage 2 considers the relative change in the probability of default occurring over the expected life of the instrument, not the change in the amount of expected credit losses.

An instrument is in stage 3 if it exhibits objective evidence of credit impairment, which includes consideration of the following:

- Known cash flow difficulties experienced by the borrower;
- A breach of contract such as default or delinquency in interest and/or principal payments;
- Breaches of loan covenants;
- It becoming probable that the borrower will enter bankruptcy or other financial reorganisation; or
- The Group, for economic or legal reasons relating to the borrower's financial difficulty, grants the borrower a concession that it would not otherwise consider.

A significant increase in credit risk occurs when any of the following situations arise within the Group's internal credit rating system:

- A decline in risk rating of three or more risk grades between risk grades 12 and 20 (equivalent to Standard and Poor's risk ratings of BBB- to B-);

- Any decline in risk rating into risk grade 21 (equivalent to Standard and Poor's risk rating of CCC+) or lower; or
- Any decline in risk rating below risk grade 21.

In addition, qualitative factors, such as watch list exposures, can also trigger a significant increase in credit risk and the credit risk on a financial asset is deemed to have increased significantly since initial recognition when contractual payments are more than 30 days past due, unless the Group has reasonable and supportable information that demonstrates otherwise.

The assessment of credit risk and estimation of ECLs is based on a probability weighted base case (neutral) and two alternative plausible (optimistic and pessimistic) scenarios provided by an external economic forecasting service provider. It also takes into account the time value of money.

When calculating the weighted average ECL, the optimistic, neutral and pessimistic scenarios and their weightings are taken into account by the Group. These are updated on a quarterly basis and captured as a rating override as part of regular counterparty reviews. The scenarios used covered a baseline scenario (50^{th} percentile) with 40% weighting, a mild upside scenario (15^{th} percentile) with 30% weighting and a downside scenario (85^{th} percentile) also with 30% weighting.

The Group's models for determining ECLs use three key input parameters, being probability of default (PD), loss given default (LGD) and exposure at default (EAD). ECLs are calculated by multiplying these three components. PD is the likelihood of default assessed on the prevailing economic conditions at the reporting date adjusted to take into account estimates of future economic conditions that are likely to impact the risk of default. LGD is a current assessment of the amount that will be recovered in the event of default and EAD is the expected balance sheet exposure at default. PD and LGD are linked to the risk grades and assigned at counterparty level.

The construction of point-in-time ("PIT") PD curves involves adjusting S&P implied through-the-cycle (TTC) transition matrices into forward-looking probability of default curves using Moody's expected default frequency (EDF) data – a forward looking model. A mapping is required to move between EDFs (with an implied Moody's rating) and S&P ratings to construct the PIT PD curves consistently. This mapping is based on the Bank's internal "Master Rating Scale". LGDs are based on a workout model, which calculates an expected rate of recovery on financial instruments by assigning a defined loss rate for different default resolution paths, and weights these according to an assumed probability of each default event occurring. The default resolution events comprise: (i) cure events; (ii) restructure events; and (iii) liquidation events. The EAD is based on the balance sheet value of the exposure (including accrued interest) adjusted for the value of any collateral (which may be on- or off-balance sheet) held against that balance.

Exposures that have not deteriorated significantly since origination or which are less than 30 days past due, are considered to have a low credit risk. The loss allowance for these instruments is based on 12 month ECL.

An exposure will migrate through the ECL stages as asset quality deteriorates. If, in a subsequent period, asset quality improves and also reverses any previously assessed significant increase in credit risk since origination, then the loss allowance reverts from lifetime ECL to 12 month ECL.

The assessment of significant increases in credit risk since initial recognition is performed on either individual financial instruments or on a collective basis for a group or sub-group of financial instruments.

When an asset carried at amortised cost is identified as impaired, a credit loss for the present value of all cash shortfalls discounted at the financial asset's original effective interest rate is recognised. The carrying amount of the asset in the statement of financial position is reduced by the amount of the loss and the loss is recognised as a credit impairment charge in the income statement.

In the case of debt instruments measured at FVOCI, the Group recognises the impairment charge in profit or loss, with the corresponding loss allowance recognised in other comprehensive income. There is no reduction in the carrying amount of the asset in the statement of financial position because these assets are carried at fair value.

For undrawn loan commitments, the Group recognises a provision in the statement of financial position for the present value of the difference between the contractual cash flows due to the Group if the commitment is drawn down and the cash flows that the Group expects to receive if the commitment is drawn down. The loss is recognised as an impairment charge in the income statement. The Group's estimate of ECL on loan commitments is consistent with its expectations of drawdowns on that loan commitment, i.e. it considers the expected portion of the loan commitment that will be drawn down within 12 months of the reporting date when estimating 12-month ECL, and the expected portion of the loan commitment that will be drawn down over the expected life of the loan commitment when estimating lifetime ECL.

For financial guarantee contracts issued, the Group is required to make payments only in the event of a default by the debtor in accordance with the terms of the instrument that is guaranteed. Accordingly, the Group recognises a provision in the statement of financial position for the present value of the expected payments required to reimburse the holder for a credit loss that it incurs less any amounts that the Group expects to recover from the holder, the debtor or any other party. The loss is recognised in the income statement.

When an asset is uncollectible, it is written off against the related provision. Such assets are written off after all the necessary procedures have been completed and the amount of the loss has been determined. Subsequent recoveries of amounts previously written off reduce the amount of the expense in the income statement.

Where the Group holds a financial guarantee or similar contract, it assesses whether it is an integral element of a financial asset that is accounted for as a component of that instrument or is a contract that is accounted for separately. Factors that the Group considers when making this assessment include whether the guarantee is:

- Implicitly part of the contractual terms of the debt instrument;
- Entered into at the same time as, and in contemplation of, the debt instrument; or
- Given by the parent of the borrower or another company within the borrower's group.

If the guarantee is determined to be an integral element of the financial asset, the Group considers the effect of the protection when measuring ECL and any premium payable is treated as a transaction cost of acquiring the financial asset. If the guarantee is not determined to be an integral element of the financial asset, the Group recognises an asset representing any prepayment of premium for the guarantee and a right to compensation for credit losses.

Purchased or originated credit-impaired (POCI) financial assets include financial assets that are purchased or originated at a deep discount that reflects incurred credit losses. This population includes the recognition of a new financial instrument following a renegotiation where concessions have been granted for economic or contractual reasons relating to the borrower's financial difficulty that otherwise would not have been considered, and exposures that arise from a forced close-out in accordance with legal or regulatory requirements. At initial recognition, POCI assets do not carry an impairment allowance; instead, lifetime expected credit losses are incorporated into the calculation of the effective interest rate. All changes in lifetime expected credit losses subsequent to the assets' initial recognition are recognised as an impairment charge.

Offsetting

Financial assets and liabilities are offset and the net amount presented in the balance sheet when the Group currently has a legally enforceable right to set-off the recognised amounts and there is an intention either to settle on a net basis, or to realise the asset and settle the liability simultaneously. Cash collateral on exchange traded derivative transactions is presented gross unless the collateral cash flows are always settled net with the derivative cash flows. In certain situations, even though master netting agreements exist, the lack of management intention to settle on a net basis results in the financial assets and liabilities being reported gross on the balance sheet.

Income and expenses are presented on a net basis only when permitted, or for gains and losses arising from a group of similar transactions.

Derivative financial instruments and hedge accounting

A derivative is a financial instrument whose value changes in response to an underlying variable, requires no initial net investment or an initial net investment that is smaller than would be required for other types of contracts that would be expected to have a similar response to changes in market factors, and is settled at a future date. Derivatives are initially recognised at fair value on the date on which they are entered into and are subsequently remeasured at fair value as described under the fair value policy above.

All derivative instruments are carried as financial assets when the fair value is positive and as financial liabilities when the fair value is negative, subject to offsetting principles as described under the heading 'Offsetting'.

The method of recognising fair value gains and losses depends on whether or not the derivatives are designated as hedging instruments, and if so, the nature of the hedge relationship.

Derivatives that qualify for hedge accounting

The Group designates certain derivatives as hedging instruments in respect of foreign currency risk, interest rate risk and equity price risk.

When derivatives are designated in a hedge relationship, the Group designates them as:

- hedges of the fair value of recognised financial assets or liabilities or unrecognised firm commitments (fair value hedges); or
- hedges of variability in cash flows attributable to a recognised asset or liability or a highly probable forecast transaction (cash flow hedges).

At inception of the hedge relationship, the Group documents the relationship between hedged items and hedging instruments, as well as its risk management objectives and strategy for undertaking various hedging relationships. The Group also documents its assessment, both at inception of the hedge and on an ongoing basis, of whether the hedging instruments are effective in offsetting the exposure to changes in the fair value or cash flows of the hedged items attributable to the hedged risk.

Fair value hedges

Where a hedging relationship is designated as a fair value hedge, the hedged item is adjusted for the change in fair value in respect of the risk being hedged. Gains or losses on the remeasurement of both the derivative and the hedged item are recognised in the income statement.

If the derivative expires, or is sold, terminated or exercised, or the hedging relationship no longer meets the criteria for fair value hedge accounting, then hedge accounting is discontinued. The adjustment to the carrying amount of a hedged item measured at amortised cost, for which the effective interest method is used, is amortised to the income statement as part of the hedged item's recalculated effective interest rate over the period to maturity.

Cash flow hedges

The effective portion of changes in the fair value of derivatives that are designated and qualify as cash flow hedges is recognised in OCI. The ineffective part of any changes in fair value is recognised immediately in the income statement. Amounts previously recognised in OCI and accumulated in equity are reclassified to the income statement in the periods in which the hedged item affects profit or loss.

If the derivative expires, or is sold, terminated or exercised, or the hedging relationship no longer meets the criteria for cash flow hedge accounting, then hedge accounting is discontinued. The cumulative gains or losses recognised in OCI and accumulated in equity remain in equity until the forecast transaction affects the income statement. If the forecast transaction is no longer expected to occur, the cumulative gains and losses accumulated in equity are immediately reclassified to the income statement.

Derivatives that do not qualify for hedge accounting

All gains and losses from changes in the fair values of derivatives that do not qualify for hedge accounting are recognised immediately in the income statement.

Financial guarantee contracts
A financial guarantee contract is a contract that requires the Group (as issuer) to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payment when due in accordance with the original or modified terms of a debt instrument.

Financial guarantee contracts issued are initially recognised at fair value, which is generally equal to the premium received. Subsequent to initial recognition, the financial guarantee liability is measured at the higher of the ECL allowance determined in accordance with IFRS 9 and the amount initially recognised less, where appropriate, the cumulative amount of income recognised in accordance with the principles of IFRS 15.

Derecognition of financial instruments
Financial assets are derecognised when the contractual rights to receive cash flows from those assets has expired, or when the Group has transferred its contractual rights to receive cash flows from the assets and either: (i) substantially all the risks and rewards of ownership have been transferred; or (ii) the Group has neither retained nor transferred substantially all the risks and rewards of ownership, but has transferred control. Any interest in transferred financial assets that is created or retained by the Group is recognised as a separate asset or liability.

On derecognition of a financial asset, the difference between the carrying amount of the asset (or the carrying amount allocated to the portion of the asset derecognised) and the sum of: (i) the consideration received (including any new asset obtained less any new liability assumed); and (ii) any cumulative gain or loss that has been recognised in OCI, is recognised in the income statement.

The Group enters into transactions whereby it transfers assets recognised on its balance sheet, but retains either all or a portion of the risks and rewards of those assets. If all or substantially all of the risks and rewards are retained, the transferred assets are not derecognised. Transfers of assets with the retention of all or substantially all of the risks and rewards include securities lending and sale and repurchase transactions (see below).

In transactions where the Group neither retains nor transfers substantially all the risks and rewards of ownership of a financial asset, it derecognises the asset if control over that asset is transferred. Any rights and obligations retained in the transfer are recognised separately as assets and liabilities as appropriate. In transfers where control over the asset is retained, the Group continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.

Financial liabilities are derecognised when they are extinguished, that is, when the obligation is discharged, cancelled or expires.

Where an existing financial asset or liability is replaced by another with the same counterparty on substantially different terms, or the terms of an existing financial asset or liability are substantially modified, such an exchange or modification is treated as a derecognition of the original asset or liability and the recognition of a new asset or liability, with the difference in the respective carrying amounts being recognised in profit or loss. Any fees received as part of the modification of a financial asset that are considered in determining the fair value of the new asset or that represent reimbursement of eligible transaction costs are included in the initial measurement of the new asset. Other costs or fees incurred as part of the modification of a financial instrument are recognised in profit or loss as part of the gain or loss on extinguishment.

In all other instances, the Group recalculates the gross carrying amount of the financial asset or liability using the original effective interest rate and recognises the resulting adjustment as a modification gain or loss in the income statement. Any costs or fees incurred and fees received as part of the modification adjust the gross carrying amount of the modified financial asset or liability and are amortised over the remaining term of the modified financial instrument.

Sale and repurchase and securities lending agreements

Securities sold subject to a commitment to repurchase at a fixed price or the purchase price plus a lender’s rate of return (repurchase agreements) are not derecognised from the balance sheet and a liability is recorded in respect of the consideration received. The liability to the counterparty is included under repurchase agreements.

Securities purchased under a commitment to resell at a fixed price or the purchase price plus a lender’s rate of return (reverse repurchase agreements), are not recognised on the balance sheet. An asset is recorded in respect of the consideration paid, included under reverse repurchase agreements.

Repurchase and reverse repurchase agreements are measured at amortised cost or at fair value through profit or loss. For the former, the difference between the purchase and sales price is treated as interest, recognised in net interest income, and is amortised over the life of the agreement using the effective interest method. For the latter, interest income and expense, and all gains and losses from changes in fair value are included in net gain/loss on non-trading financial assets and liabilities at fair value through profit or loss.

Contracts that are economically equivalent to reverse repurchase or repurchase agreements (such as sales or purchases of debt securities entered into together with total return swaps with the same counterparty) are accounted for similarly to, and presented together with, reverse repurchase or repurchase agreements.

Securities lent to counterparties are retained on the balance sheet and are classified and measured in accordance with the policy above. Securities borrowed are not recognised on the balance sheet unless sold to third parties. In these cases, the obligation to return the securities borrowed is recorded at fair value as a trading liability, with fair value changes recognised in the income statement. Income and expenses arising from the securities borrowing and lending business are recognised over the term of the transactions.

6. Commodities and related transactions

Commodities that are principally acquired by the Group for the purpose of selling in the near future and generating a profit from fluctuations in price or broker-traders' margin, are measured at fair value less costs to sell to the intended buyer and are reported as non-financial assets held for trading within other assets. All changes in fair value less costs to sell are recognised in net trading revenue in the period of change.

Forward contracts to purchase or sell commodities that are either net settled or where physical delivery occurs and the commodities are held to settle another derivative contract, are recognised as derivative financial instruments and measured at fair value. All changes in fair value are recognised in profit or loss in net trading revenue in the period of change.

Commodities purchased under agreements to resell, at either a fixed price or the purchase price plus a lender's rate of return that are in substance financing transactions are recorded as reverse repurchase agreements under trading assets. The difference between the purchase and sales price is treated as interest and is recognised in net trading revenue along with all other gains and losses from changes in fair value.

Commodities lent to counterparties are retained on the balance sheet and are classified and measured in accordance with the policies set out above. Commodities borrowed are not recognised on the balance sheet unless sold to third parties, in which case, the obligation to return the commodity borrowed is recorded at fair value as non-financial liabilities due to customers within other liabilities. Income and expenses arising from the Group's commodity lending and borrowing business are recognised over the period of the transactions.

The Group enters into prepayment agreements whereby it earns either a fixed return or a variable return linked to commodity prices. The former are recorded as loans and advances, initially recognised at fair value, and subsequently measured at amortised cost using the effective interest method. The latter are recorded as non-trading financial assets at fair value through profit or loss, initially recognised at fair value, and subsequently measured at fair value through profit or loss, with fair value changes recognised in net gain on non-trading financial assets and liabilities at fair value through profit or loss.

Precious metals can be held by the Group on an allocated or unallocated basis. Commodities held by the Group, which have been allocated to customers, are not recognised on the Group's balance sheet.

7. Intangible assets

Computer software

Costs associated with developing or maintaining computer software and the acquisition of software licences are generally recognised as an expense as incurred. However, direct computer software development costs that are clearly associated with an identifiable and unique system, which will be controlled by the Group and have a probable future economic benefit beyond one year are recognised as intangible assets. Capitalisation is limited to development costs where the Group is able to demonstrate its intention and ability to complete and use the software, the technical feasibility of the development, the availability of resources to complete the development, how the development will generate probable future economic benefits and the ability to reliably measure costs relating to the development. Development costs include employee costs for software development staff and an appropriate portion of relevant overheads.

Expenditure subsequently incurred on computer software is capitalised only when it increases the future economic benefits embodied in the specific asset to which it relates. Costs relating to the ongoing day to day maintenance of computer software are expensed immediately as incurred.

Direct computer software development costs recognised as intangible assets are amortised on a straight-line basis at rates appropriate to the expected useful lives of the assets (two to five years) from the date the assets are available for use, and are measured at cost less accumulated amortisation and accumulated impairment losses. The carrying amount of capitalised computer software is reviewed annually and is written down when impaired. Amortisation methods, useful lives and residual values are reviewed at each financial year-end and adjusted, if appropriate.

8. Property and equipment

Computer and office equipment, furniture, fittings and other tangible assets are measured at cost less accumulated depreciation and accumulated impairment losses. Cost includes expenditure that is directly attributable to the acquisition of the asset. Where significant parts of an item of property or equipment have different useful lives, they are accounted for as separate items (major components) of property and equipment.

Costs that are subsequently incurred are included in the asset's related carrying amount or are recognised as a separate asset, as appropriate, only when it is probable that future economic benefits will flow to the Group and the cost of the item can be measured reliably. Expenditure that does not meet these criteria is recognised in profit or loss as incurred. Depreciation, impairment losses and gains and losses on disposal of assets are included in profit or loss.

Property and equipment are depreciated to their estimated residual values on a straight-line basis over the estimated useful lives of the assets. Residual values, useful lives and the depreciation method applied are reviewed at each financial year-end and adjusted, if appropriate.

The estimated useful lives of tangible assets are typically as follows:

Computer equipment	2 to 5 years
Office equipment	5 to 7 years
Furniture and fittings	5 to 7 years

There has been no change to the estimated useful lives and depreciation methods from those applied in the previous financial year.

Items of property and equipment are derecognised on disposal or when no future economic benefits are expected from their use or disposal. The gain or loss on derecognition is recognised in profit or loss and is determined as the difference between the net disposal proceeds and the carrying amount of the item.

9. Impairment of non-financial assets

Intangible assets that have an indefinite useful life or that are not yet available for use are tested annually for impairment and additionally when an indicator of impairment exists. Intangible assets that are subject to amortisation and other non-financial assets are reviewed for impairment at each reporting date and tested for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable.

An impairment loss is recognised in profit or loss for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use. Fair value less costs to sell is determined by ascertaining the current market value of an asset and deducting any costs related to the realisation of the asset. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

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

10. Leases

As lessee

At the inception of a contract, the Group assesses whether the contract is or contains a lease. A contract is, or contains, a lease if it conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Group uses the definition of a lease in IFRS 16 Leases.

The Group recognises a right of use asset and a lease liability at the lease commencement date or on the effective date of the modification for the modification of an existing lease. The right of use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of costs to dismantle and remove the underlying asset or to restore the underlying asset to its original condition, less any lease incentives received.

The right of use asset is subsequently measured at cost less any accumulated depreciation and impairment losses, and is adjusted for certain remeasurements of the lease liability. Depreciation is determined using the straight line method from the commencement date to the end of the lease term, and the Group applies IAS 36 *Impairment of Assets* to determine whether the right of use asset is impaired and to account for any impairment loss identified.

The Group presents the right of use asset in the balance sheet in the same line item within which the corresponding underlying assets would be presented if they were owned. The Group's leases principally relate to properties and are accordingly included in property and equipment in the balance sheet.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date or the date of modification, discounted using the interest rate implicit in the lease, if that rate can be determined, or the Group's incremental borrowing rate appropriate for the right-of-use asset arising from the lease.

The lease liability is subsequently measured at amortised cost using the effective interest method. It is remeasured when there is a change in future lease payments arising from a change in an index or rate, or a change in the assessment of whether a purchase or extension option is reasonably certain to be exercised or a termination option is reasonably certain not to be exercised.

The Group presents the lease liability in other liabilities in the balance sheet.

The Group has applied judgement to determine the lease term for some lease contracts in which it is a lessee that include renewal options or break clauses. The assessment of whether the Group is reasonably certain to exercise such options impacts the lease term, which could significantly affect the amount of lease liabilities and right of use assets recognised.

The Group has elected not to recognise right of use assets and lease liabilities for leases of low-value assets and short term leases, i.e. leases that, at the commencement date, have a lease term of 12-months or less. The Group recognises the lease payments associated with these leases as an expense on a straight line basis over the lease term.

As lessor

When the Group acts as lessor, it determines at lease inception whether each lease is a finance lease or an operating lease.

To classify each lease, the Group makes an overall assessment whether the lease transfers substantially all of the risks and rewards incidental to ownership of the underlying asset. If this is the case, then the lease is a finance lease; if not then it is an operating lease. As part of this assessment, the Group considers certain indicators such as whether the lease is for the major part of the economic life of the asset.

When the Group is an intermediate lessor, it accounts for its interests in the head lease and the sub-lease separately. It assesses the lease classification of a sub-lease with reference to the right of use asset arising from the head lease, not with reference to the underlying asset.

The Group is lessor in relation to sub-leases on certain of its properties. These are classified as operating leases under IFRS 16, with the lease asset recognised as part of the right of use asset for the related head lease. Lease payments received on these sub-leases are recognised in profit or loss on a straight line basis over the lease term.

11. Provisions, contingent assets and contingent liabilities

Provisions are recognised when the Group has a present legal or constructive obligation as a result of past events, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate of the amount of the obligation can be made. Provisions are determined by discounting the expected future cash flows required to settle the obligation using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the liability.

A provision for onerous contracts is recognised when the expected benefits to be derived by the Group from a contract are lower than the unavoidable costs of meeting its obligations under the contract. The provision is measured at the present value of the lower of the expected cost of terminating the contract and the expected net cost of continuing with the contract. Before a provision is established, the Group recognises any impairment loss on the assets associated with that contract.

A provision for restructuring is recognised when the Group has approved a detailed and formal restructuring plan and the restructuring either has commenced or has been announced publicly. A restructuring provision includes only the direct expenditures arising from the restructuring, which are both necessarily entailed by the restructuring and not associated with the ongoing activities of the entity. Future operating losses are not provided for.

Contingent liabilities include certain guarantees, other than financial guarantees, and letters of credit. Contingent liabilities are not recognised in the annual financial statements but are disclosed unless they are remote.

Contingent assets are not recognised in the annual financial statements but are disclosed when it is probable that economic benefits will flow to the Group.

12. Tax

Direct taxation

Direct taxation includes current and deferred tax. Current and deferred tax are recognised in profit or loss except to the extent that they relate to items recognised directly in equity or in OCI, in which case they are recognised in the same statement in which the related item appears. The tax consequences of the Group's dividend payments (including distributions on other equity instruments) are charged or credited to the statement in which the profit distributed originally arose.

Current tax represents the expected tax payable on taxable profits for the year, calculated using tax rates enacted or substantively enacted at the reporting date, and any adjustments to tax payable in respect of previous years.

Deferred tax is recognised in respect of temporary differences arising between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes. Deferred tax is calculated using the tax rates expected to apply to the temporary differences when they reverse, based on laws that have been enacted or substantively enacted at the reporting date.

The amount of deferred tax recognised is based on the expected manner of realisation or settlement of the asset or liability and is not discounted. Deferred tax liabilities are generally recognised for all taxable temporary differences. Deferred tax assets are recognised to the extent it is probable that future taxable profits will be available against which the unused tax losses and other deductible temporary differences can be utilised. Deferred tax assets are reviewed at each reporting date and are reduced to the extent it is no longer probable that the related tax benefit will be realised.

Current and deferred tax assets and liabilities are offset if there is a legally enforceable right to offset and they relate to income taxes levied by the same tax authority on the same taxable entity, or on different taxable entities in the same tax reporting group, and they intend to settle on a net basis or the tax assets and liabilities will be realised and settled simultaneously.

Indirect taxation

Indirect taxes, including non-recoverable value added tax (VAT) and other duties for banking activities, are recognised in profit or loss as they arise and disclosed separately in the income statement.

13. Employee benefits

Post-employment benefits – defined contribution plans

The Group operates a number of defined contribution plans, with contributions based on a percentage of pensionable earnings funded by both employer companies and employees. The assets of these plans are generally held in separate trustee-administered funds.

Contributions to these plans are recognised as an expense in the income statement in the periods during which services are rendered by employees.

Short-term benefits

Short-term employee benefits consist of salaries, accumulated leave payments, cash bonuses and any non-monetary benefits such as medical care contributions. Short-term employee benefit obligations are measured on an undiscounted basis and are expensed as the related service is provided.

A liability is recognised for the amount expected to be paid under short-term cash bonus plans or accumulated leave if the Group has a present legal or constructive obligation to pay these amounts as a result of past service provided by the employee and the obligation can be estimated reliably.

14. Deferred compensation

The Group operates an annual incentive arrangement that all eligible employees participate in, with a portion of that award being deferred for up to seven years through the quanto stock unit plan and deferred cash awards, for employees with an incentive award above a set threshold or that meet certain other criteria. The quanto stock unit plan awards qualifying employees quanto stock units denominated in US dollars for nil consideration. The value of units is based on the ICBC ordinary share price as quoted on the Hong Kong Stock Exchange and the awards are cash settled upon vesting or after a further retention period of six or twelve months. The deferred cash awards provide a conditional right to a payout of a fixed cash amount set on the grant date of the award and are similarly paid upon vesting or after a further retention period of six or twelve months.

For awards granted on 1 March 2024 and future periods, the quanto stock unit plan will be replaced with the Deferred Performance Plan ('the DPP'), which will replace the quanto stock unit with an ICBCS Notional Share, for employees that meet certain specified criteria. This will initially be anchored to ICBCS's net asset value attributable to ordinary shareholders as at 31 December 2023, as defined in the consolidated statement of changes in shareholders' equity, and then annually adjusted by ICBCS's return on equity for the relevant performance year. As for quanto stock units, ICBCS Notional Shares will be awarded to qualifying employees for nil consideration and will be cash settled upon vesting or after a further retention period of twelve months. Deferred cash awards will remain unchanged. The DPP and the quanto stock unit plan will run in parallel until the final quanto stock unit plan awards vest or the further retention period expires.

Awards under the quanto stock unit plan and DPP, and deferred cash awards, which are granted following Board Remuneration Committee approval subsequent to year end, vest annually over periods of up to seven years dependent on the employee remaining in service for the period concerned.

The period over which the expense for deferred cash and notional share awards under both the quanto stock unit plan and the DPP is recognised is based upon the period employees consider their services contribute to the awards. For past awards, the Group accrued the expense of the deferred cash and notional share awards over the period from the legal grant date to the date that the awards vest. In relation to awards granted from 1 January 2021, the Group, taking into account the changing employee understanding surrounding the awards, considered it appropriate to include the relevant performance period before the legal grant date in the vesting period for recognising the expense related to such awards.

The amount of the accrued liability for the deferred cash and notional share awards under both the quanto stock unit plan and the DPP is re-measured at the end of each reporting period, taking into account assumptions about potential leavers and the rights given to actual leavers during the year. Changes in the liability are accounted for through the income statement over the life of the awards. Changes in the liability for the quanto stock unit awards arising from ICBC share price movements have been materially hedged, applying cash flow hedging principles.

15. Revenue and expenditure

Revenue described below represents the most appropriate equivalent of turnover for a bank and is derived substantially from the business of banking and related activities.

Net interest income

Interest income and expense are recognised in the income statement on an accruals basis using the effective interest method for all interest-bearing financial instruments, except those classified at fair value through profit or loss. Under the effective interest method, interest is recognised at a rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, where appropriate, a shorter period, to the net carrying amount of the financial asset or financial liability. Direct incremental transaction costs incurred and origination fees received, including loan commitment fees, as a result of bringing margin-yielding assets or liabilities on to the balance sheet, are capitalised to the carrying amount of financial instruments that are not at fair value through profit or loss and amortised as interest income or expense over the life of the asset or liability as part of the effective interest rate.

Where the estimate of payments or receipts on financial assets or financial liabilities are subsequently revised, the carrying amount of the financial asset or financial liability is adjusted to reflect actual and revised estimated cash flows. The carrying amount is calculated by computing the present value of the estimated cash flows at the financial asset's or financial liability's original effective interest rate. Any adjustment to the carrying value is recognised in net interest income.

Non-interest revenue

Net fees, commission and revenue sharing arrangements

Fee and commission income, including transactional fees, account servicing fees, sales commissions and placement fees are recognised as the related services are performed. Loan commitment fees for loans that are not expected to be drawn down are recognised on a straight-line basis over the commitment period. Loan syndication fees, where the Group does not participate in the syndication or participates at the same effective interest rate for comparable risk as other participants, are recognised as revenue when the syndication has been completed. Syndication fees that do not meet these criteria are capitalised as origination fees and amortised as interest income over the life of the loan as part of the effective interest rate.

A contract with a customer that results in a recognised financial instrument in the Group's financial statements may be partially in the scope of IFRS 9 and partially in the scope of IFRS 15 *Revenue from Contracts with Customers* (IFRS 15). If this is the case, the Group first applies IFRS 9 to separate and measure the part of the contract that is in the scope of that standard and then applies IFRS 15 to the residual.

The fair value of issued financial guarantee contracts on initial recognition is amortised as income over the term of the contract.

Fee and commission expenses included in net fee and commission income are mainly transaction and service fees relating to financial instruments, which are expensed as the services are received. Expenditure is recognised as fee and commission expenses where the expenditure is linked to the production of fee and commission income.

Net trading revenue

Net trading revenue comprises all gains and losses from changes in the fair value of financial assets and liabilities held for trading (including derivative assets and liabilities not designated as hedging instruments) and commodities within non-financial assets held for trading, together with related interest income and expense, dividends and foreign exchange differences.

Gains/losses from non-trading financial instruments at fair value through profit or loss
Gains/losses from non-trading financial instruments at fair value through profit or loss includes all gains and losses from changes in the fair value of non-trading financial instruments designated and otherwise mandatorily measured at fair value through profit or loss, including interest income and expense, dividends and foreign exchange differences in respect of those financial instruments, and gains and losses from changes in the fair value of derivatives managed in conjunction with those financial instruments.

Dividend income
Dividends are recognised in profit or loss when the right to receipt 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 measured reliably.

16. Segment reporting

An operating segment is a component of the Group engaged in business activities, whose operating results are reviewed regularly by management in order to make decisions about resources to be allocated to the segment and assess its performance. The Group's identification of segments and the measurement of segment results are based on the Group's internal reporting to management. Transactions between segments are priced at market-related rates.

17. Fiduciary activities (client money and client assets)

The Group engages in trust or other fiduciary activities that result in the holding or placing of assets on behalf of individuals, trusts, post-employment benefit plans and other institutions. These assets and the income arising directly thereon are excluded from these annual financial statements as they are not assets of the Group. Fee income earned and fee expenses incurred by the Group relating to its responsibilities from fiduciary activities are recognised in the income statement.

18. New standards and interpretations not yet adopted

The IASB has issued a number of new or amended standards and interpretations, which will be effective for annual periods beginning on or after 1 January 2024. The Group has not early adopted any of these new or amended standards or interpretations and they are not expected to have a material effect on its financial statements or the separate financial statements of the Company when adopted.

16. Notes to the annual financial statements

1. Segment reporting

The Group's Executive Committee has been determined to be the chief operating decision maker for the Group. The Group's results comprise two reportable segments, namely Commodities and Fixed Income and Currencies (FIC). As described below, these divisions provide different products and services, and are managed and reported separately based on the Group's management and internal reporting structure. Costs are allocated to business units based on relevant cost drivers (such as risk weighted assets and income generating headcount). Segment performance is evaluated based on operating profits or losses and is measured consistently with operating profits or losses in the Group's financial statements. The central treasury balance sheet and net revenues are reflected in Other. Income taxes are allocated to segments to the extent they relate to specific transactions (e.g. withholding taxes, tax on recoveries on commodity inventory intermediation), but otherwise are managed on a group basis and included in Other. Information related to each reportable segment is set out below. The information is shown after eliminating transactions and balances between segments.

Operating Segments

Commodities	The Commodities business unit provides trading, sales and structuring expertise and has global presence across base metals, precious metals and energy.
FIC	The FIC business unit provides a comprehensive range of foreign exchange, money markets, interest rate and credit products, including structured lending. The segment is largely focused on emerging and frontier markets.

Segment Results

2023	**Commodities $m**	**FIC $m**	**Other $m**	**Total $m**
Net interest income	**38.3**	**42.7**	**72.9**	**153.9**
Net fees and commission	**9.8**	**29.8**	**(1.0)**	**38.6**
Net trading revenue	**122.6**	**191.0**	**0.4**	**314.0**
Net gain on non-trading financial assets and liabilities at fair value through profit or loss	**6.6**	**44.9**	**-**	**51.5**
Total operating income	**177.3**	**308.4**	**72.3**	**558.0**
Credit impairment recoveries/(charges)	**(3.2)**	**53.4**	**-**	**50.2**
Income after credit impairments	**174.1**	**361.8**	**72.3**	**608.2**
Operating expenses	**(163.7)**	**(233.9)**	**-**	**(397.6)**
Profit before taxation	**10.4**	**127.9**	**72.3**	**210.6**
Income tax charge	**-**	**(4.8)**	**(18.7)**	**(23.5)**
Profit attributable to equity shareholders	**10.4**	**123.1**	**53.6**	**187.1**
Included in operating expenses:				
Depreciation	**10.6**	**6.9**	**-**	**17.5**
Amortisation of intangible assets	**4.4**	**4.9**	**0.3**	**9.6**

1. Segment reporting (continued)

Segment Results (continued)

2022	Commodities $m	FIC $m	Other $m	Total $m
Net interest income	27.8	49.7	21.0	98.5
Net fees and commission	7.2	18.8	(0.6)	25.4
Net trading revenue	165.1	233.1	2.4	400.6
Net gain / (loss) on non-trading financial assets and liabilities at fair value through profit or loss	6.0	46.0	(0.3)	51.7
Recoveries on commodity inventory intermediation	233.7	-	-	233.7
Total operating income	439.8	347.6	22.5	809.9
Credit impairment recoveries / (charges)	(2.6)	(58.2)	-	(60.8)
Income after credit impairments	437.2	289.4	22.5	749.1
Operating expenses	(148.4)	(225.2)	-	(373.6)
Profit before taxation	288.8	64.2	22.5	375.5
Income tax charge	(34.6)	(10.1)	(13.7)	(58.4)
Profit attributable to equity shareholders	254.2	54.1	8.8	317.1
Included in operating expenses:				
Depreciation	10.9	7.3	-	18.2
Amortisation of intangible assets	5.0	6.0	-	11.0

In previous years, central treasury net revenues have been allocated to the business segments on a proportionate basis. However, due to rising interest rates, a consequence of tightening fiscal monetary policy, a more significant proportion of the Group's revenue has been generated within central treasury from the return on the Bank's capital base and deployment of its surplus liquidity at the Bank of England. Therefore, central treasury revenues are now shown separately in 'Other' in the Group's segmental analysis rather than being proportionally allocated to the business segments. Prior year comparatives have accordingly been restated on a comparable basis.

Segment assets and liabilities

2023	Commodities $m	FIC $m	Other $m	Total $m
Total assets	**7,406.6**	**12,364.6**	**3,475.9**	**23,247.1**
Total liabilities	**7,406.6**	**12,364.6**	**1,605.0**	**21,376.2**
2022				
Total assets	5,637.5	11,180.8	5,809.0	22,627.3
Total liabilities	5,637.5	11,180.8	4,127.0	20,945.3

1. Segment reporting (continued)

Geographical analysis

The geographical analysis has been compiled on the basis of location of the office where the transactions are recorded and has been prepared in accordance with the Capital Requirements (Country-by-Country Reporting) Regulations 2013, under the framework of the Capital Requirements Directive IV (CRD IV).

Name 2023	Nature of activities	Geographical location	Turnover[1] $m	Profit / (loss) before tax $m	Corporation tax paid[2] $m	Average number of employees
ICBC Standard Bank Plc	Banking	United Kingdom	**492.4**	**197.7**	**28.4**	**710**
ICBC Standard Bank Plc Singapore branch	Banking	Singapore	**38.2**	**9.7**	**2.0**	**91**
ICBC Standard Resources (China) Limited	Trading	China	**4.7**	**1.0**	**0.1**	**12**
ICBC Standard NY Holdings, Inc. group	Broker/Dealer	USA	**22.7**	**2.2**	**1.8**	**31**
Total			**558.0**	**210.6**	**32.3**	**844**
2022						
ICBC Standard Bank Plc	Banking	United Kingdom	743.1	356.5	42.1	686
ICBC Standard Bank Plc Singapore branch	Banking	Singapore	37.2	11.3	1.2	84
ICBC Standard Resources (China) Limited	Trading	China	4.6	1.3	0.2	10
ICBC Standard NY Holdings, Inc. group	Broker/Dealer	USA	25.0	6.4	0.3	32
Total			809.9	375.5	43.8	812

[1] Turnover is defined as accounting revenue, being total operating income, and at the entity level is recorded under the terms of the Group's transfer pricing model for taxation.

[2] ICBC Standard Bank Plc corporation tax paid in 2023 includes US$2.0 million paid in relation to the USA permanent establishment (2022: US$nil).

Summary balance sheet

Name 2023	Total assets $m	Non-financial assets $m	Total liabilities $m	Non-financial liabilities $m
ICBC Standard Bank Plc	**23,153.6**	**5,077.5**	**21,363.2**	**3,471.4**
ICBC Standard Bank Plc Singapore branch	**61.7**	**6.9**	**10.8**	**10.8**
ICBC Standard Resources (China) Limited	**16.0**	**2.2**	**2.4**	**2.0**
ICBC Standard NY Holdings, Inc. group	**38.9**	**7.2**	**9.3**	**9.3**
Other consolidation eliminations	**(23.1)**	**(9.4)**	**(9.5)**	**(9.3)**
Total	**23,247.1**	**5,084.4**	**21,376.2**	**3,484.2**
2022				
ICBC Standard Bank Plc	22,541.8	2,987.9	20,930.6	2,597.5
ICBC Standard Bank Plc Singapore branch	54.7	10.9	11.9	11.9
ICBC Standard Resources (China) Limited	17.7	2.6	4.2	2.1
ICBC Standard NY Holdings, Inc. group	38.8	6.6	10.8	10.8
Other consolidation eliminations	(25.7)	(10.1)	(12.2)	(10.1)
Total	22,627.3	2,997.9	20,945.3	2,612.2

During the year, the group received public subsidies of US$10,000 from the Singapore government under its Jobs Growth Incentive scheme, in relation to the Covid-19 pandemic (2022: US$94,000).

2. Critical accounting judgements and estimates

In preparing the consolidated and Company financial statements, estimates and judgements are made that could affect the reported amounts of assets and liabilities within the next reporting period. Estimates and judgements are continually evaluated and are based on factors such as historical experience and current best estimates of uncertain future events that are believed to be reasonable under the circumstances.

2. Critical accounting judgements and estimates (continued)

2.1 Determining fair value (estimate)

The fair value of financial instruments that are not quoted in active markets is determined using other valuation techniques. Wherever possible, models use only observable market data. Where required, these models incorporate assumptions that are not supported by prices from observable current market transactions in the same instrument and are not based on available observable market data. Such assumptions include recoverability, risk premiums, liquidity discount rates, credit spreads, volatilities and correlations. Changes in these assumptions could affect the reported fair values of financial instruments, including the related unrealised gains and losses recognised in income in the period. Additional disclosures on fair value measurements of financial instruments are set out in notes 23 to 25.

2.2 Legal proceedings and regulatory matters (judgement)

From time to time, the Group is the subject of litigation, regulatory reviews and requests for information by various governmental and regulatory bodies arising from the Group's business operations.

Provisions for legal proceedings and regulatory matters typically require a high degree of judgement based on the specific facts and circumstances relating to individual events and there can be a wide range of possible outcomes and uncertainties and, as a result, it is often not practicable to make meaningful estimates of the probability and amount of any outflows that may arise, even when matters are at a more advanced stage.

Notwithstanding the above, the Bank recognised provisions totalling US$10.8 million in December 2023 in respect of litigation, in accordance with accounting policy 11, primarily in relation to the estimated legal costs of defending certain claims as they progress through the courts or other stages of the litigation process. Additional disclosures on legal proceedings against the Group are set out in Note 29.3.

2.3 Deferred tax assets (judgement)

The accounting policy for the recognition of deferred tax assets is described in accounting policy 12. A deferred tax asset is recognised to the extent it is probable that future taxable profits will be available against which the deductible temporary differences and unutilised trading losses can be utilised. Recognition relies on management's judgements surrounding the probability and sufficiency of future taxable profits and future reversals of existing taxable temporary differences.

Recognition is based on the evidence available concerning conditions at the reporting date including significant management judgements with respect to projections of business revenues. Management's judgement takes into account the impact of both negative and positive evidence, including historical financial results and projections of future taxable income, on which the recognition of the deferred tax asset is mainly dependent.

Recent profits in the Group are not deemed sufficient on their own to support recognition of the majority of deferred tax assets on the basis of estimated future taxable profits over the Group's four-year planning horizon. This reflects uncertainties arising from the general negative macro-economic environment, market volatility created by various recent events including the war in Ukraine, renewed conflict in the Middle East and other geopolitical tensions, as well as the inherent volatility associated with the Group's trading activities. Given this uncertainty, management has utilised a one-year look-ahead period to support the recognition of a deferred tax asset.

2. Critical accounting judgements and estimates (continued)

2.3 Deferred tax assets (judgement) (continued)

At 31 December 2023, the Group recognised a deferred tax asset of US$8.0 million, including a UK deferred tax asset of US$7.3 million, based on a one-year look-ahead of probable profits for 2024 against which the associated deductible temporary differences and unutilised trading losses can be offset. As the UK deferred tax asset recognised is dependent on the judgement of probable future profits, to the extent the level of actual profits is greater than what has been determined to be probable, the level of deferred tax asset recognised could have been materially different. Gross unutilised trading losses carried forward and other temporary differences of US$767.9 million, representing potential deferred tax assets of US$192.0 million, have not been recognised by the Group.

Additional disclosure relating to the deferred tax asset is set out in note 12.

3. Cash and balances with central banks

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Reserve Account with Bank of England[1]	**2,635.9**	4,856.1	**2,635.9**	4,856.1

[1] This reserve account operates in the same way as a current account with an overnight contractual tenor.

4. Due from banks and other financial institutions

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Gross banks and other financial institutions[1]	**2,252.5**	2,191.3	**2,191.4**	2,130.1
Credit loss allowances	**(4.1)**	(9.0)	**(4.1)**	(9.0)
	2,248.4	2,182.3	**2,187.3**	2,121.1
Segmental industry analysis				
Due from banks	**1,008.1**	904.9	**947.0**	843.8
Other financial institutions	**1,240.3**	1,277.4	**1,240.3**	1,277.3
	2,248.4	2,182.3	**2,187.3**	2,121.1
Included above are the following amounts with related parties				
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches	**86.6**	81.1	**57.0**	50.1
Balances with shareholder with significant influence (SBG) and subsidiaries and branches	**33.6**	13.3	**33.6**	13.3
	120.2	94.4	**90.6**	63.4

[1] To manage interest rate volatility on certain term loans, the Group entered into fair value hedges. Refer to note 7.4.2.

5. Financial assets held for trading

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Government, utility bonds and treasury bills	**979.7**	521.5	**979.7**	521.5
Corporate bonds and floating rate notes	**298.8**	120.4	**298.8**	120.4
Reverse repurchase agreements	**-**	60.8	**-**	60.8
	1,278.5	702.7	**1,278.5**	702.7

6. Non-trading financial assets at fair value through profit or loss

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Debt instruments	**2,852.8**	2,189.5	**2,852.8**	2,189.5
Unlisted equities	**3.8**	4.2	**3.8**	4.2
	2,856.6	2,193.7	**2,856.6**	2,193.7

7. Derivative instruments

7.1 Derivative assets and liabilities

All derivatives are classified as either derivatives held for trading or derivatives held for hedging.

Group 2023	Maturity analysis of net fair value < 1 year $m	1 - 5 years $m	> 5 years $m	Net fair value $m	Fair value of assets $m	Fair value of liabilities $m	Contract / notional amount $m
Gross derivatives held for trading							
Foreign exchange derivatives	(4.2)	(4.9)	-	(9.1)	1,245.7	(1,254.8)	85,941.4
Forwards	(5.5)	(4.8)	-	(10.3)	1,241.1	(1,251.4)	85,027.9
Options	1.3	(0.1)	-	1.2	4.6	(3.4)	913.5
Interest rate derivatives	(176.3)	(17.8)	65.7	(128.4)	6,807.9	(6,936.3)	450,605.0
Caps and floors	0.2	2.8	(0.7)	2.3	3.2	(0.9)	990.9
Forwards	(0.2)	-	-	(0.2)	3.4	(3.6)	7,216.8
Futures options	-	0.1	-	0.1	2.6	(2.5)	67,499.8
Swaps	(164.6)	(19.3)	66.4	(117.5)	6,790.4	(6,907.9)	373,192.3
Swaptions	(11.7)	(1.4)	-	(13.1)	8.3	(21.4)	1,705.2
Commodity derivatives	4.7	6.9	-	11.6	1,892.5	(1,880.9)	111,465.6
Forwards	49.1	16.6	-	65.7	582.7	(517.0)	25,729.5
Futures	4.6	(5.1)	-	(0.5)	1,183.3	(1,183.8)	80,214.3
Options	1.1	(0.8)	-	0.3	22.7	(22.4)	1,683.1
Swaps	(50.1)	(3.8)	-	(53.9)	103.8	(157.7)	3,838.7
Credit derivatives	(13.1)	(100.0)	0.1	(113.0)	70.7	(183.7)	1,749.6
Credit default swaps	0.7	(3.6)	3.2	0.3	13.4	(13.1)	923.3
Total return swaps	(13.8)	(96.4)	(3.1)	(113.3)	57.3	(170.6)	826.3
Total gross derivative assets / (liabilities) held for trading	(188.9)	(115.8)	65.8	(238.9)	10,016.8	(10,255.7)	649,761.6
Gross derivatives held for hedging							
Derivatives designated as cash flow hedges	17.0	2.9	(0.1)	19.8	22.2	(2.4)	281.6
Foreign exchange forwards	17.8	4.4	-	22.2	22.2	-	261.4
Equity options	(0.8)	(1.5)	(0.1)	(2.4)	-	(2.4)	20.2
Derivatives designated as fair value hedges	-	(6.0)	3.2	(2.8)	3.3	(6.1)	244.9
Interest rate swaps	-	(6.0)	3.2	(2.8)	3.3	(6.1)	244.9
Total gross derivative assets / (liabilities) held for hedging	17.0	(3.1)	3.1	17.0	25.5	(8.5)	526.5
Total gross derivative assets / (liabilities)	(171.9)	(118.9)	68.9	(221.9)	10,042.3	(10,264.2)	650,288.1
Offset (Note 26)	(177.2)	-	-	(177.2)	(6,659.1)	6,481.9	-
Total derivative assets / (liabilities)	(349.1)	(118.9)	68.9	(399.1)	3,383.2	(3,782.3)	650,288.1
Included above are the following amounts with related parties:							
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches				258.5	467.8	(209.3)	
Balances with shareholder with significant influence (SBG) and subsidiaries and branches				22.6	342.0	(319.4)	

The contract/notional amounts of derivatives indicate the nominal value of transactions outstanding at the balance sheet date. They do not represent amounts at risk.

The Company reported derivative assets of US$3,383.2 million (2022: US$4,968.0 million) and derivative liabilities of US$3,782.3 million (2022: US$5,352.8 million).

7. Derivative instruments (continued)

7.1 Derivative assets and liabilities (continued)

Group 2022	Maturity analysis of net fair value < 1 year $m	1 - 5 years $m	> 5 years $m	Net fair value $m	Fair value of assets $m	Fair value of liabilities $m	Contract / notional amount $m
Gross derivatives held for trading							
Foreign exchange derivatives	(33.5)	16.6	-	(16.9)	1,958.6	(1,975.5)	109,525.6
Forwards	(33.6)	17.0	-	(16.6)	1,939.2	(1,955.8)	106,644.4
Options	0.1	(0.4)	-	(0.3)	19.4	(19.7)	2,881.2
Interest rate derivatives	(90.3)	42.9	(83.8)	(131.2)	4,048.1	(4,179.3)	289,771.8
Caps and floors	(0.1)	-	(0.7)	(0.8)	0.3	(1.1)	333.3
Forwards	1.2	(0.2)	-	1.0	2.3	(1.3)	2,272.8
Futures options	(1.3)	0.9	-	(0.4)	8.2	(8.6)	75,984.0
Swaps	(92.2)	44.9	(83.1)	(130.4)	4,023.8	(4,154.2)	210,393.2
Swaptions	2.1	(2.7)	-	(0.6)	13.5	(14.1)	788.5
Commodity derivatives	(83.6)	(48.8)	-	(132.4)	2,633.4	(2,765.8)	114,090.1
Forwards	123.8	11.0	-	134.8	698.0	(563.2)	30,010.5
Futures	(0.7)	(7.0)	-	(7.7)	1,696.4	(1,704.1)	76,466.6
Options	(7.5)	10.1	-	2.6	27.4	(24.8)	1,540.1
Swaps	(199.2)	(62.9)	-	(262.1)	211.6	(473.7)	6,072.9
Credit derivatives	(5.8)	14.0	(119.8)	(111.6)	104.5	(216.1)	1,950.9
Credit default swaps	(5.3)	(2.4)	(6.5)	(14.2)	13.3	(27.5)	1,100.8
Total return swaps	(0.5)	16.4	(113.3)	(97.4)	91.2	(188.6)	850.1
Total gross derivative assets / (liabilities) held for trading	(213.2)	24.7	(203.6)	(392.1)	8,744.6	(9,136.7)	515,338.4
Gross derivatives held for hedging							
Derivatives designated as cash flow hedges	(0.7)	7.1	(0.1)	6.3	18.2	(11.9)	378.9
Foreign exchange forwards	0.3	8.6	-	8.9	18.2	(9.3)	361.3
Equity options	(1.0)	(1.5)	(0.1)	(2.6)	-	(2.6)	17.6
Derivatives designated as fair value hedges	2.8	(7.3)	5.5	1.0	8.5	(7.5)	274.2
Interest rate swaps	2.8	(7.3)	5.5	1.0	8.5	(7.5)	274.2
Total gross derivative assets / (liabilities) held for hedging	2.1	(0.2)	5.4	7.3	26.7	(19.4)	653.1
Total gross derivative assets / (liabilities)	(211.1)	24.5	(198.2)	(384.8)	8,771.3	(9,156.1)	515,991.5
Offset (Note 26)	-	-	-	-	(3,803.3)	3,803.3	-
Total derivative assets / (liabilities)	(211.1)	24.5	(198.2)	(384.8)	4,968.0	(5,352.8)	515,991.5
Included above are the following amounts with related parties:							
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches				61.1	511.5	(450.4)	
Balances with shareholder with significant influence (SBG) and subsidiaries and branches				5.2	441.0	(435.8)	

7. Derivative instruments (continued)

7.2 Use and measurement of derivative instruments

In the normal course of business, the Group enters into a variety of derivative transactions for both trading and hedging purposes. Derivative financial instruments are entered into for trading purposes on behalf of customers and for the Group's own account, and for hedging foreign exchange, interest rate and equity exposures. Derivative instruments used by the Group in both trading and hedging activities include swaps, options, forwards, futures and other similar types of instruments based on foreign exchange rates, interest rates, credit risk and the prices of commodities and equities.

The risks associated with derivative instruments are monitored in the same manner as for the underlying instruments. Risks are also measured across the product range in order to take into account possible correlations.

The fair values of all derivatives are recognised in the balance sheet and are only offset to the extent that the Group currently has a legal right of set-off and there is an intention to settle on a net basis.

Swaps are transactions in which two parties exchange cash flows on a specified notional amount for a predetermined period. The major types of swap transactions undertaken by the Group are as follows:

- Interest rate swap contracts generally entail the contractual exchange of fixed and floating rate interest payments in a single currency, based on a notional amount and an interest reference rate.
- Cross currency interest rate swaps involve the exchange of interest payments based on two different currency principal balances and interest reference rates and generally also entail exchange of principal amounts at the start and/or end of the contract.
- Credit default swaps are the most common form of credit derivative, under which the party buying protection makes one or more payments to the party selling protection during the term of the swap in exchange for an undertaking by the seller to make a payment to the buyer following a credit event, as defined in the contract, with respect to a third party.
- Total return swaps are contracts in which one party (the total return payer) transfers the economic risks and rewards associated with an underlying asset to another party (the total return receiver). The transfer of risks and rewards is effected by way of an exchange of cash flows that mirror changes in the value of the underlying asset and any income derived therefrom.

Options are contractual agreements under which the seller (writer) grants the purchaser the right, but not the obligation, either to buy (call option) or to sell (put option) by, or on a set date, a specified amount of a financial instrument or commodity at a predetermined price. The seller receives a premium from the purchaser for this right. Options may be traded over-the-counter (OTC) or on a regulated exchange.

Forwards and futures are contractual obligations to buy or sell a specified amount of a financial instrument or commodity on a future date at a specified price. Forward contracts are tailor-made agreements that are transacted between counterparties in the OTC market, whereas futures are standardised contracts transacted on regulated exchanges.

7.3 Derivatives held for trading

The Group trades derivative instruments on behalf of customers and for its own account. The Group transacts derivative contracts to address customer demands both as a market maker in the wholesale markets and in structuring tailored derivatives for customers. The Group also takes positions for its own account. Trading derivative products includes the following derivative instruments:

7. Derivative instruments (continued)

7.3 Derivatives held for trading (continued)

7.3.1 Foreign exchange derivatives

Foreign exchange derivatives are used to hedge foreign currency risks on behalf of customers and for the Group's own positions. Foreign exchange derivatives primarily consist of forward contracts and options.

7.3.2 Interest rate derivatives

Interest rate derivatives are used to modify the volatility and interest rate characteristics of interest-earning assets and interest-bearing liabilities on behalf of customers and for the Group's own positions. Interest rate derivatives primarily consist of caps and floors, forward rate agreements, futures options, swaps and swaptions.

7.3.3 Commodity derivatives

Commodity derivatives are used to address customer commodity demands and to take positions for the Group's own account. Commodity derivatives primarily consist of forwards, futures, options and swaps.

7.3.4 Credit derivatives

Credit derivatives are used to hedge the credit risk exposure from one counterparty to another and manage the credit exposure to selected counterparties on behalf of customers and for the Group's own positions. Credit derivatives primarily consist of credit default swaps and total return swaps.

7.4 Derivatives held for hedging

7.4.1 Derivatives designated as cash flow hedges

The Group designates certain derivative contracts as a hedge of the exposure to variability in cash flows attributable to a particular risk associated with a recognised asset or liability or highly probable future transaction that could affect profit or loss (cash flow hedges), as follows:

- The income statement volatility associated with future highly probable expenses in currencies other than the functional currency is hedged utilising forward exchange contracts.
- Equity options are used to mitigate risk of change in cash flows arising from changes in the long-term incentive liability, underpinned by the ICBC share price (note 30.9).

The former provides a hedge of the Group's sterling cost base against the US dollar functional currency for exchange rate movements. The hedge ratio is determined by comparing the notional amount of the derivative against the forecasted operating costs that are to be hedged. For the purposes of hedge effectiveness testing, the Group compares changes in the fair value of the hedged item resulting from movements in exchange rates with changes in the fair value of the forward currency transactions used as hedging instruments, including the time value elements of those forwards.

The latter provides a hedge of the Group's employee share based payments liability against the equity share price movements of the underlying equity shares to which these relate. The hedge ratio is determined by comparing the notional amount of the derivative against the value of the share based payments liability to be hedged. For the purposes of hedge effectiveness testing, the Group compares changes in the fair value of the hedged item resulting from movements in the equity share price with changes in the fair value of the equity options used as hedging instruments. Only the intrinsic value of the options has been designated as a hedge and so effectiveness is measured by comparing changes in the liability and options using the spot equity price, ignoring time value. Consequently, any time value changes will be recognised immediately in profit or loss as ineffectiveness.

7. Derivative instruments (continued)

7.4 Derivatives held for hedging (continued)

7.4.1 Derivatives designated as cash flow hedges (continued)

Possible sources of ineffectiveness in the Group's cash flow hedging relationships include the following:

- Use of derivatives as the hedging instrument creates credit risk exposure to the derivative counterparties. This is mitigated by using highly rated derivative counterparties and margining arrangements.
- Differences in timing of settlements on the hedged item and hedging instrument. This is mitigated by matching the terms of the hedged item and hedging instrument as closely as possible.
- For hedges of the Group's share based payments liability, excluding time value from the value of the options used to hedge the Group's employee share based payments liability.
- For hedges of the Group's cost base, ineffectiveness will arise if the notional amount hedged exceeds the actual or budgeted cash flows. This is mitigated by only hedging 90% of the budgeted cost base.

Gains and losses on the effective portion of derivatives designated as cash flow hedges of forecast transactions are initially recognised directly in other comprehensive income in the cash flow hedging reserve, and are transferred to the income statement when the forecast cash flows impact the income statement.

For cash flow hedges, the following table contains information related to items designated as hedging instruments, hedged items and hedge ineffectiveness:

Group and Company	**Hedging instrument**					**Hedged item**		
(US$'millions)	**Carrying amount[1]**		**Hedge ineffectiveness**					
Hedged risk	**Assets**	**Liabilities**	**Change in fair value used to calculate hedge ineffectiveness**	**Change in value of hedging instrument recognised in OCI**	**Hedge ineffectiveness recognised in profit or loss[2]**	**Amount recycled from OCI due to hedged item affecting profit or loss[3,4]**	**Change in value used for calculating hedge ineffectiveness**	**Cash flow hedge reserve[5]**
2023								
Foreign exchange risk	**22.1**	**-**	**19.3**	**19.3**	**-**	**(6.0)**	**(19.3)**	**22.1**
Equity price risk	**-**	**(2.3)**	**0.3**	**(1.0)**	**1.3**	**1.2**	**1.0**	**(0.6)**
Total	**22.1**	**(2.3)**	**19.6**	**18.3**	**1.3**	**(4.8)**	**(18.3)**	**21.5**
2022								
Foreign exchange risk	18.2	(9.4)	(7.1)	(7.1)	-	20.5	7.1	8.8
Equity price risk	-	(2.6)	0.1	(0.4)	0.5	0.1	0.4	(0.8)
Total	18.2	(12.0)	(7.0)	(7.5)	0.5	20.6	7.5	8.0

[1] All hedging instruments are recorded in derivative financial assets or derivative financial liabilities in the balance sheet.
[2] All hedge ineffectiveness is recorded in net trading revenue.
[3] All amounts transferred from the cash flow hedging reserve into profit or loss are due to hedged items affecting profit or loss. No amounts have been recycled for items where hedge accounting had previously been applied for which hedged future cash flows are no longer expected to occur.
[4] Reclassification adjustments are recognised in the income statement in operating expenses, with those relating to foreign exchange risk in other operating expenses and those relating to equity price risk in staff costs.
[5] All amounts in the cash flow hedge reserve relate to continuing hedges. There are no amounts in the cash flow hedge reserve for hedging relationships for which hedge accounting is no longer applied.

At 31 December 2023, the Group held forward foreign exchange contracts to hedge its budgeted sterling costs with a nominal amount of £222.8 million (US$284.0 million) (2022: £306.0 million/US$369.3 million), a maturity of less than two years and an average US Dollar/Sterling exchange rate of 1.17 (2022: 1.18).

7. Derivative instruments (continued)

7.4 Derivatives held for hedging (continued)

7.4.2 Derivatives designated as fair value hedges

The Group's fair value hedges consist of interest rate swaps and a cross currency swap that are used to mitigate the risk of changes in the fair value of financial instruments as a result of changes in market interest and foreign currency exchange rates.

The financial instruments designated in fair value hedge relationships comprise certain term loan facilities and subordinated debt issued by the Group. The hedge ratio for the Group's fair value hedging relationships is determined by comparing the principal of the hedged item and the notional amount for the derivative. For the purposes of hedge effectiveness testing, the Group compares changes in the fair value of the hedged item resulting from movements in interest and foreign currency exchange rates with changes in the fair value of the interest rate and cross currency swaps used as the hedging instruments.

Possible sources of ineffectiveness in the Group's fair value hedging relationships include the following:

- Use of derivatives as the hedging instrument creates credit risk exposure to the derivative counterparties. This is mitigated by using highly rated swap counterparties and margining arrangements.
- Differences in timing of settlements on the hedged item and hedging instrument. This is mitigated by matching the terms of the hedged item and hedging instrument as closely as possible.
- Different amortisation profiles on the hedged item principal amounts and the swap notionals. This is mitigated by matching the terms of the hedged item and hedging instruments as closely as possible.
- Use of different discounting curves when measuring the fair value of the hedged items and hedging instruments.

For qualifying fair value hedges, all changes in the fair value of the derivative and in the fair value of the hedged item in relation to the risks being hedged are recognised in the income statement.

7. Derivative instruments (continued)

7.4 Derivatives held for hedging (continued)

7.4.2 Derivatives designated as fair value hedges (continued)

For fair value hedges, the following table contains information related to items designated as hedging instruments, hedged items and ineffectiveness:

Group and Company	Hedging instrument					Hedged item		
(US$ millions)	Carrying amount of hedging instruments[1]		Hedge ineffectiveness[2,3]			Carrying amount of the hedged item[4]	Accumulated amount of fair value hedge adjustment gains/(losses) of hedged items[5,6]	
Hedging instrument	**Assets**	**Liabilities**	**Gains/(losses) on hedging instrument**	**Gains/(losses) on hedged item**	**Ineffectiveness**		**Assets**	**Liabilities**
2023								
Interest rate swaps								
Loans and advances to customers	**3.2**	**(0.2)**	**(3.8)**	**4.0**	**0.2**	**93.4**	**-**	**(7.9)**
Due from banks and other financial institutions[7]	**-**	**-**	**(0.6)**	**0.2**	**(0.4)**	**-**	**-**	**-**
Subordinated debt	**-**	**(5.8)**	**2.1**	**(2.0)**	**0.1**	**(146.2)**	**5.1**	**-**
Totals	**3.2**	**(6.0)**	**(2.3)**	**2.2**	**(0.1)**	**(52.8)**	**5.1**	**(7.9)**
2022								
Interest rate swaps								
Loans and advances to customers	5.7	-	10.1	(9.9)	0.2	104.5	-	(11.4)
Due from banks and other financial institutions[7]	2.8	-	(0.6)	0.5	(0.1)	14.9	-	(0.2)
Subordinated debt	-	(7.5)	(7.2)	7.2	-	(144.1)	7.2	-
Totals	8.5	(7.5)	2.3	(2.2)	0.1	(24.7)	7.2	(11.6)

1 All hedging instruments are recorded in derivative financial assets or derivative financial liabilities in the balance sheet.
2 All hedge ineffectiveness is recorded in net trading revenue.
3 Gains/(losses) on hedging instruments and hedged items are the amounts used to calculate hedge ineffectiveness.
4 This represents the carrying value on the consolidated balance sheet and comprises amortised cost before allowance for credit losses, plus fair value hedge adjustments.
5 This represents the accumulated fair value hedge adjustment and is a component of the carrying amount of the hedged item.
6 There were no hedges discontinued during the current or prior year.
7 Hedging instrument for item classified as due from banks and other financial institutions is a cross currency swap providing a hedge of interest rate and foreign currency risk.

7.5 IBOR reform transition

In 2019 global regulators announced a decision to phase out certain benchmark interest rates (IBORs) and replace them with approved alternative benchmarks, referred to as risk free rates (RFRs). In response, the Group established an IBOR implementation project to make the necessary infrastructure, contractual and procedural changes required to meet the transition and reform requirements. The project, sponsored by the Head of Global Markets, completed its final phase in the summer of 2023 following the successful transition of transactions referencing USD LIBOR to SOFR and other approved benchmarks.

The project delivered the capability for future benchmark transitions to be managed on a 'business-as-usual' basis, with the RUONIA transition being implemented in December 2023.

8. Reverse repurchase agreements

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Measured at amortised cost:	**1,102.1**	1,143.7	**1,102.1**	1,143.7
Banks and other financial institutions	**1,102.3**	1,143.9	**1,102.3**	1,143.9
Credit loss allowances	**(0.2)**	(0.2)	**(0.2)**	(0.2)
Measured at FVTPL:	**1,833.9**	1,470.9	**1,833.9**	1,470.9
Banks and other financial institutions	**1,833.9**	1,205.4	**1,833.9**	1,205.4
General governments and non-financial institutions	**-**	265.5	**-**	265.5
	2,936.0	2,614.6	**2,936.0**	2,614.6
Included above are the following amounts with related parties:				
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches	**274.4**	376.2	**274.4**	376.2
Balances with shareholder with significant influence (SBG) and subsidiaries and branches	**508.0**	151.2	**508.0**	151.2
	782.4	527.4	**782.4**	527.4

9. Loans and advances to customers

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Gross loans and advances to customers	**774.9**	822.6	**774.9**	822.6
Demand loans and advances	**39.5**	38.2	**39.5**	38.2
Term loans[1]	**735.4**	784.4	**735.4**	784.4
Credit loss allowances	**(3.6)**	(4.0)	**(3.6)**	(4.0)
	771.3	818.6	**771.3**	818.6
Segmental Industry analysis				
Governments and public sector organisations	**93.4**	104.5	**93.4**	104.5
Manufacturing	**60.3**	9.5	**60.3**	9.5
Mining and gas extraction	**361.9**	406.2	**361.9**	406.2
Wholesale	**157.5**	289.7	**157.5**	289.7
Other	**101.8**	12.7	**101.8**	12.7
	774.9	822.6	**774.9**	822.6

[1] To manage interest rate volatility on certain term loans, the Group entered into fair value hedges. Refer to note 7.4.2.

10. Financial investments

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Amortised Cost:				
Debt securities	**1,312.2**	-	**1,312.2**	-
Fair value through other comprehensive income:				
Debt securities	**631.7**	1,293.4	**631.7**	1,293.4
Fair value through profit or loss:				
Debt securities	**108.9**	-	**108.9**	-
	2,052.8	1,293.4	**2,052.8**	1,293.4

11 Property and equipment

11.1 Summary

	2023				2022			
	Cost	**Accumulated depreciation**	**Accumulated impairment**	**Carrying value**	Cost	Accumulated depreciation	Accumulated impairment	Carrying value
Group	**$m**	**$m**	**$m**	**$m**	$m	$m	$m	$m
Computer equipment	**31.2**	**(27.6)**	**-**	**3.6**	31.4	(25.1)	-	6.3
Office equipment	**6.4**	**(5.4)**	**-**	**1.0**	5.6	(5.0)	-	0.6
Furniture and fittings	**18.3**	**(14.5)**	**-**	**3.8**	18.0	(12.8)	-	5.2
Right of use lease assets[1]	**119.8**	**(56.3)**	**(5.0)**	**58.5**	74.3	(46.8)	(5.0)	22.5
	175.7	**(103.8)**	**(5.0)**	**66.9**	129.3	(89.7)	(5.0)	34.6

11.2 Movement

Group	2022 Carrying value $m	Additions $m	Disposals $m	Depreciation charge $m	Impairment $m	**2023 Carrying value $m**
Computer equipment	6.3	0.8	(0.3)	(3.2)	-	**3.6**
Office equipment	0.6	0.8	-	(0.4)	-	**1.0**
Furniture and fittings	5.2	0.2	-	(1.6)	-	**3.8**
Right of use lease assets	22.5	48.3	-	(12.3)	-	**58.5**
	34.6	50.1	(0.3)	(17.5)	-	**66.9**

Group	2021 Carrying value $m	Additions $m	Disposals $m	Depreciation charge $m	Impairment $m	2022 Carrying value $m
Computer equipment	7.1	3.3	(0.2)	(3.9)	-	6.3
Office equipment	0.9	0.1	-	(0.4)	-	0.6
Furniture and fittings	6.0	0.8	-	(1.6)	-	5.2
Right of use lease assets	33.4	1.4	-	(12.3)	-	22.5
	47.4	5.6	(0.2)	(18.2)	-	34.6

11.3 Summary

	2023				2022			
	Cost	**Accumulated depreciation**	**Accumulated impairment**	**Carrying value**	Cost	Accumulated depreciation	Accumulated impairment	Carrying value
Company	**$m**	**$m**	**$m**	**$m**	$m	$m	$m	$m
Computer equipment	**29.3**	**(26.0)**	**-**	**3.3**	29.5	(23.6)	-	5.9
Office equipment	**5.7**	**(4.7)**	**-**	**1.0**	4.9	(4.3)	-	0.6
Furniture and fittings	**9.6**	**(6.6)**	**-**	**3.0**	9.3	(5.7)	-	3.6
Right of use lease assets[1]	**108.9**	**(47.6)**	**(5.0)**	**56.3**	63.4	(40.0)	(5.0)	18.4
	153.5	**(84.9)**	**(5.0)**	**63.6**	107.1	(73.6)	(5.0)	28.5

11 Property and equipment (continued)

11.4 Movement

Company	2022 Carrying value $m	Additions $m	Disposals $m	Depreciation charge $m	Impairment $m	**2023 Carrying value $m**
Computer equipment	5.9	0.7	(0.3)	(3.0)	-	**3.3**
Office equipment	0.6	0.8	-	(0.4)	-	**1.0**
Furniture and fittings	3.6	0.3	-	(0.9)	-	**3.0**
Right of use lease assets	18.4	48.3	-	(10.4)	-	**56.3**
	28.5	50.1	(0.3)	(14.7)	-	**63.6**

Company	2021 Carrying value $m	Additions $m	Disposals $m	Depreciation charge $m	Impairment $m	2022 Carrying value $m
Computer equipment	6.8	2.9	(0.1)	(3.7)	-	5.9
Office equipment	0.9	0.1	-	(0.4)	-	0.6
Furniture and fittings	3.8	0.7	-	(0.9)	-	3.6
Right of use lease assets	28.5	0.3	-	(10.4)	-	18.4
	40.0	4.0	(0.1)	(15.4)	-	28.5

[1] Right of use lease assets principally relate to leased properties.

12. Deferred tax assets

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Deferred tax asset recognised	**8.0**	0.6	**7.3**	-
Deferred tax asset not recognised	**192.0**	228.5	**192.0**	228.5

12.1 Movements in deferred tax balances

Group 2023	**Opening balance $m**	**Movement in asset recognised $m**	**Movement in asset not recognised[1] $m**	**Closing balance $m**
Total recognised deferred tax	**0.6**	**7.4**	**-**	**8.0**
Capital allowances	**0.2**	**1.5**	**-**	**1.7**
Share-based payments	**0.3**	**0.1**	**-**	**0.4**
Other short-term temporary differences	**0.1**	**-**	**-**	**0.1**
Unused tax losses	**-**	**5.8**	**-**	**5.8**
Total unrecognised deferred tax[2]	**228.5**	**(7.3)**	**(29.2)**	**192.0**
Temporary differences not recognised	**24.1**	**(1.5)**	**(6.2)**	**16.4**
Unused tax losses not recognised	**204.4**	**(5.8)**	**(23.0)**	**175.6**

12. Deferred tax assets (continued)

12.1 Movements in deferred tax balances (continued)

Group 2022	Opening balance $m	Movement in asset recognised $m	Movement in asset not recognised[1] $m	Closing balance $m
Total recognised deferred tax	0.7	(0.1)	-	0.6
Capital allowances	0.2	-	-	0.2
Share-based payments	0.2	0.1	-	0.3
Other short-term temporary differences	0.3	(0.2)	-	0.1
Total unrecognised deferred tax[2]	299.8	-	(71.3)	228.5
Temporary differences not recognised	37.4	-	(13.3)	24.1
Unused tax losses not recognised	262.4	-	(58.0)	204.4

Company 2023	**Opening balance $m**	**Movement in asset recognised $m**	**Movement in asset not recognised[1] $m**	**Closing balance $m**
Total recognised deferred tax	**-**	**7.3**	**-**	**7.3**
Capital allowances	**-**	**1.5**	**-**	**1.5**
Unused tax losses	**-**	**5.8**	**-**	**5.8**
Total unrecognised deferred tax[2]	**228.5**	**(7.3)**	**(29.2)**	**192.0**
Temporary differences not recognised	**24.1**	**(1.5)**	**(6.2)**	**16.4**
Unused tax losses not recognised	**204.4**	**(5.8)**	**(23.0)**	**175.6**

Company 2022	Opening balance $m	Movement in asset recognised $m	Movement in asset not recognised[1] $m	Closing balance $m
Total recognised deferred tax	-	-	-	-
Total unrecognised deferred tax[2]	299.8	-	(71.3)	228.5
Temporary differences not recognised	37.4	-	(13.3)	24.1
Unused tax losses not recognised	262.4	-	(58.0)	204.4

[1] Movement in asset not recognised represents the tax value of movements in the year in respect of tax losses and other deductible temporary differences for which no deferred tax has been recognised. The movement in asset not recognised in 2022 includes a US$23.7 million reduction as a result of the change in surcharge rate on banking companies from 8% to 3% (and increase in the surcharge allowance from £25 million to £100 million) with effect from 1 April 2023 which was enacted on 24 February 2022. US$14.4 million of the change relates to UK tax losses and US$9.3 million relates to UK temporary differences.

[2] Deferred tax assets have not been recognised by the Group in respect of UK gross deductible temporary differences of US$65.4 million (2022: US$96.3 million) and gross UK tax losses of US$702.5 million (2022: $817.5 million) which can be carried forward indefinitely.

13. Other assets

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Non-financial assets held for trading - Commodities inventory[1]	**4,792.2**	2,772.2	**4,792.2**	2,772.2
Precious metals	**3,898.8**	2,398.4	**3,898.8**	2,398.4
Allocated inventories	**1,819.8**	1,311.3	**1,819.8**	1,311.3
Unallocated inventories	**2,079.0**	1,087.1	**2,079.0**	1,087.1
Base metals	**639.1**	351.7	**639.1**	351.7
Energy	**254.3**	22.1	**254.3**	22.1
Other	**205.5**	185.0	**204.9**	184.8
Unsettled dealing balances	**95.1**	45.3	**95.1**	45.3
Other receivables	**81.6**	106.3	**81.0**	106.1
Intangible assets	**28.8**	33.4	**28.8**	33.4
	4,997.7	2,957.2	**4,997.1**	2,957.0

[1] Non-financial assets held for trading form part of the Group's commodities business and are integral to the Group's strategy. Commodity inventories include holdings in facilities operated by authorised third parties.

Included above are the following amounts due from related parties:

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches	**3.8**	4.1	**3.8**	4.1
Balances with shareholder with significant influence (SBG) and subsidiaries and branches	**9.7**	8.0	**9.7**	8.0
	13.5	12.1	**13.5**	12.1

Precious metals stored by the Group for customers are not recognised on the Group's balance sheet. The value stored at year end was:

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Precious metals – Stored for customers	**41,662.2**	33,252.0	**41,662.2**	**33,252.0**

13.1 Intangible assets (Group and Company) - Summary

	2023				2022			
	Cost	**Accumulated amortisation**	**Accumulated impairment**	**Carrying value**	Cost	Accumulated amortisation	Accumulated impairment	Carrying value
	$m	**$m**	**$m**	**$m**	$m	$m	$m	$m
Computer software	**77.3**	**(54.5)**	**(5.4)**	**17.4**	76.2	(44.8)	(5.4)	26.0
Work in progress[1]	**11.4**	**-**	**-**	**11.4**	7.4	-	-	7.4
	88.7	**(54.5)**	**(5.4)**	**28.8**	83.6	(44.8)	(5.4)	33.4

13. Other assets

13.2 Intangible assets (Group and Company) - Movement

	2021 Carrying value $m	Additions $m	Transfers $m	Amortisation charge[2] $m	Impairment charge $m	2022 Carrying value $m	**Additions $m**	**Transfers $m**	**Amortisation charge[2] $m**	**Impairment charge $m**	**2023 Carrying value $m**
Computer software	18.0	19.0	-	(11.0)	-	26.0	**1.0**	**-**	**(9.6)**	**-**	**17.4**
Work in progress[1]	15.0	11.4	(19.0)	-	-	7.4	**5.0**	**(1.0)**	**-**	**-**	**11.4**
	33.0	30.4	(19.0)	(11.0)	-	33.4	**6.0**	**(1.0)**	**(9.6)**	**-**	**28.8**

[1] Work in progress relates to strategic software systems currently being developed, which are not amortised as they are not yet available for use.

[2] See Note 30.7.

14. Investment in group companies

Company	**2023 $m**	2022 $m
Carrying value at the end of the year	**29.5**	29.5

The subsidiary undertakings are as follows (directly held unless otherwise indicated):

Entity	**Activity**	**Location of registered office[2]**	**% Interest in ordinary shares**
ICBC Standard NY Holdings Inc.	Holding company	United States of America	100
ICBC Standard Securities Inc.[1]	Broker / dealer	United States of America	100
ICBC Standard Resources (America) Inc.[1]	Trading company	United States of America	100
ICBC Standard Resources (China) Limited	Trading company	The People's Republic of China	100

[1] Indirectly held - the immediate parent of these entities is ICBC Standard NY Holdings Inc.

[2] Refer to registered address information on page 168.

15. Financial liabilities held for trading

	Group		**Company**	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Government and utility bonds	**431.0**	238.5	**431.0**	238.5
Corporate bonds	**-**	1.5	**-**	1.5
Credit-linked notes	**359.4**	367.0	**359.4**	367.0
Deposits by banks	**844.3**	688.2	**844.3**	688.2
	1,634.7	1,295.2	**1,634.7**	1,295.2

Included above are the following amounts with related parties:

	Group		**Company**	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches	**829.6**	649.8	**829.6**	649.8
	829.6	649.8	**829.6**	649.8

16. Non-trading financial liabilities at fair value through profit or loss

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Debt instruments	**2,016.2**	2,058.4	**2,016.2**	2,058.4
Deposits	**1,727.8**	892.8	**1,727.8**	892.8
	3,744.0	2,951.2	**3,744.0**	2,951.2

Included above are the following amounts with related parties:

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches	**2,977.4**	2,800.1	**2,977.4**	2,800.1
	2,977.4	2,800.1	**2,977.4**	2,800.1

The amount contractually payable on maturity of the debt instruments held at fair value through profit or loss at 31 December 2023 was US$3,738.1 million, which was US$5.9 million lower than the balance sheet carrying value (2022: US$2,935.7 million, which was US$15.5 million lower than the balance sheet carrying value). The cumulative amount of change in fair value attributable to changes in the Group's own credit risk was a loss of US$1.0 million (2022: US$1.3 million loss).

17. Due to banks and other financial institutions

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Due to banks	**6,125.2**	5,412.9	**6,125.2**	5,412.9
Other financial institutions	**428.0**	809.0	**428.0**	809.0
	6,553.2	6,221.9	**6,553.2**	6,221.9

Included above are the following amounts with related parties:

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches	**3,693.4**	3,691.9	**3,693.4**	3,691.9
Balances with shareholder with significant influence (SBG) and subsidiaries and branches	**333.3**	265.6	**333.3**	265.6
	4,026.7	3,957.5	**4,026.7**	3,957.5

18. Repurchase agreements

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Measured at amortised cost:				
Banks and other financial institutions	**696.4**	341.5	**696.4**	341.5
Measured at FVTPL:				
Banks and other financial institutions	**156.7**	188.6	**156.7**	188.6
	853.1	530.1	**853.1**	530.1

Included above are the following amounts with related parties:

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches	**-**	121.4	**-**	121.4
Balances with shareholder with significant influence (SBG) and subsidiaries and branches	**295.1**	-	**295.1**	-
	295.1	121.4	**295.1**	121.4

19. Due to customers

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Call deposits	**490.0**	1,149.3	**490.0**	1,149.3
Term deposits	**587.1**	587.2	**587.1**	587.2
	1,077.1	1,736.5	**1,077.1**	1,736.5

20. Subordinated debt

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Subordinated floating rate notes 2029[1]	**100.0**	100.0	**100.0**	100.0
Subordinated fixed rate notes 2032[2]	**144.9**	142.8	**144.9**	142.8
Accrued interest	**2.7**	2.6	**2.7**	2.6
	247.6	245.4	**247.6**	245.4
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches	**247.6**	245.4	**247.6**	245.4

[1] Subordinated bonds with a principal amount of US$100.0 million and a floating interest rate of three-month USD Libor plus 2.75% per annum were issued in July 2019. The interest rate on these bonds was changed to SOFR plus 3.01% per annum on 31 July 2023 as part of the USD Libor transition. These bonds mature on 31 July 2029.

[2] Subordinated bonds with a principal amount of US$150.0 million and an initial fixed interest rate of 4.961% per annum for the first five years were issued in April 2022. These bonds mature on 27 April 2032. To manage interest rate volatility, the Group entered into a fair value hedge. Refer to note 7.4.2.

Claims in respect of the loan capital are subordinated to the claims of other creditors. The Group has not defaulted on principal or interest, or incurred any other breaches with respect to its subordinated liabilities.

21. Other liabilities

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Precious metal payables	**3,140.6**	2,395.5	**3,140.6**	2,395.5
Unsettled dealing balances	**98.9**	32.6	**98.6**	32.2
Long-term incentive schemes	**29.7**	24.3	**28.2**	23.1
Leasehold liabilities	**69.5**	26.3	**66.6**	21.1
Other	**143.1**	130.0	**140.9**	126.9
	3,481.8	2,608.7	**3,474.9**	2,598.8

Included above are the following amounts with related parties:

	Group		Company	
	2023 $m	2022 $m	**2023 $m**	2022 $m
Balances with ultimate holding company (ICBC Limited) and subsidiaries and branches	**1,570.6**	572.0	**1,570.6**	571.9
Balances with shareholder with significant influence (SBG) and subsidiaries and branches	**1.4**	1.3	**1.4**	1.3
	1,572.0	573.3	**1,572.0**	573.2

22. Leases

The Group's leases principally relate to properties occupied by Group companies as office space in the various locations in which it operates. For certain properties, the Group sub-leases some space to third parties and to other companies within its shareholders' groups. These are all classified as operating leases.

22. Leases (continued)

Right of use assets and lease liabilities recognised for leases for which the Group is lessee are presented in property and equipment (see note 11) and other liabilities (see note 21) respectively. The amounts recognised in profit or loss in respect of these leases is shown in the table below and the total cash outflow recognised in the statement of cash flows was US$11.2 million (2022: US$11.0 million), comprising US$10.4 million (2022: US$9.7 million) principal repayments recognised as cash flows from financing activities and US$0.8 million (2022: US$1.3 million) interest expense recognised as cash flows from operating activities.

	2023 $m	2022 $m
Depreciation charge of right of use assets (Note 30.7)	**12.3**	12.3
Interest expense on lease liabilities (Note 30.2)	**0.8**	1.3
Income from sub-leasing right of use assets	**(4.3)**	(4.0)

The table below shows the maturity profile of the Group's leasehold liabilities based on contractual undiscounted payments:

	2023 $m	2022 $m
Less than one year	**12.2**	13.6
Between one and five years	**45.6**	11.5
More than five years	**38.1**	
	95.9	25.1

The undiscounted lease payments to be received for the Group's sub-leases are as follows:

	2023 $m	2022 $m
Less than one year	**2.3**	3.4
One to two years	**0.7**	2.4
Two to three years	**0.9**	-
Three to four years	**1.4**	-
Four to five years	**1.4**	-
More than five years	**6.9**	-
	13.6	5.8

On 24 November 2023, the Company entered in to a reversionary lease with the head lessor for its London office premises for a term of 10-years, commencing on 30 September 2024, immediately following expiry of its existing lease on the same office premises. The new lease is treated as a modification of the existing lease and was recognised on the effective date of the modification, being the date the reversionary lease was agreed, with the lease liability accordingly being remeasured by discounting the revised lease payments using the Company's incremental borrowing rate for funding an asset of similar tenor and cash flows. A corresponding adjustment was made to the right of use asset, which was also adjusted for any lease incentives received and initial direct costs incurred by the Company. Payments under the new lease are accordingly included in the above disclosure of the Group's contractual undiscounted leasehold liabilities.

On the same date, the Company entered into a reversionary lease to sub-let part of the office space in its London office premises to an existing tenant. This new sub-lease also takes effect from 30 September 2024, on expiry of the existing sub-lease for the same office space, and is for a term of 10-years. The new sub-lease is also treated as a lease modification and is accordingly recognised as a new lease from the effective date of the modification, being 24 November 2023, with any prepaid or accrued lease payments relating to the original lease being considered as part of the lease payments for the new lease. Payments due under the new sub-lease are accordingly included in the above disclosure of undiscounted lease payments to be received by the Group.

On 9 November 2023, ICBC Standard Resources (America) Inc. entered into a new lease for replacement office space in New York. The lessor is currently fitting out the new premises, with the lease scheduled to commence in the third quarter of 2024. The lease is for a term of 10-years, with aggregate future undiscounted lease payments of US$8.7 million.

23. Estimation of fair values

23.1 Financial instruments measured at fair value

The process of marking to market seeks to value a financial instrument at its fair value. The best indicator of fair value is an independently published price quoted in an active market. If the instrument is not traded in an active market, its fair value is determined using valuation techniques consistent with other market participants to price similar financial instruments.

Where valuation techniques are used to determine fair values, they are validated and periodically independently reviewed by qualified senior personnel. All models are approved before they are used, and models are calibrated and back-tested to ensure that outputs reflect actual data and comparative market prices. To the extent practical, models use only observable data; however, areas such as credit risk (both own and counterparty), volatilities and correlations require management to make estimates. Changes in assumptions about these factors could affect the reported fair value of the financial instruments. Such assumptions include risk premiums, liquidity discount rates, credit spreads, market volatilities and product correlations.

In order to arrive at fair value, valuation adjustments are made where appropriate to incorporate liquidity risk, model risk, parameter uncertainty and credit risk. As a practical expedient, instruments are sometimes priced at mid-market. This includes situations where instruments that comprise a combination of risks (e.g. corporate bonds which include interest rate and credit risk) are hedged against some of the risks, leaving the other risks unhedged. In that case, a bid/offer adjustment is applied to the net open risk position as appropriate.

The valuation methodologies used are objective and deterministic, i.e. given the same market conditions and holding assumptions, the marking process should produce identical results. However, valuing any instrument or portfolio involves a degree of judgement and can never be completely defined in mechanistic terms.

There may not be one perfect mark for any position, but rather ranges of possible values. At any point in time, the mark-to-market on a financial instrument must be based on the effective deal tenor or term of the underlying risk.

23.2 Fair value of financial instruments carried at amortised cost

The fair value of financial instruments not carried at fair value incorporates the Group's estimate of the amount at which it would be able to sell an asset or pay to transfer a liability in an orderly transaction between market participants at the measurement date. It does not reflect the costs/benefits that the Group expects to measure on the flows generated over the expected life of the instrument. Other reporting entities may use different valuation methodologies and assumptions in determining fair values for which no observable market prices are available.

The fair values stated at a point in time may differ significantly from the amounts which will actually be paid on the maturity date or settlement dates of the instruments. In many cases, it will not be possible to realise immediately the estimated fair values.

23. Estimation of fair values (continued)

23.2 Fair value of financial instruments carried at amortised cost (continued)

The following methods and significant assumptions have been applied in determining the fair values of financial instruments not carried at fair value:

- The fair value of demand deposits with no specific maturity is assumed to be the amount payable at the end of the reporting period.
- The fair value of the variable and fixed rate financial instruments carried at amortised cost is estimated by comparing interest rates when the loans were granted with current market interest rates and credit spreads on similar loans.
- For impaired loans, fair value is estimated using valuation models, such as discounting the future cash flows over the time period they are expected to be recovered, which includes consideration of collateral and expected lifetime credit losses.
- For secured loans and deposits arising from sale and repurchase agreements and for bond transactions that are due to settle on a date beyond the market convention (i.e. forward settlement), the Group receives collateral in the form of cash or securities. The collateral is valued using established valuation techniques and variation margin is called or paid. Carrying amounts therefore closely reflect fair values.

23.3 Credit, debit and funding valuation adjustments (CVA, DVA, and FVA)

The methodology for estimating CVA and DVA as at 31 December 2023 was consistent with that used at 31 December 2022, with inputs updated where required. Credit and debit valuation adjustments are taken against derivative exposures in order to reflect the potential impact of counterparty performance with regards to these contracts.

The exposure upon which a provision is calculated is not the current replacement value in the balance sheet but rather an expectation of future exposures. The typical calculation of a future exposure on a trade is based on a simulation of expected positive and negative exposures performed to standard market methodologies.

For most products, the Group uses a simulation methodology to calculate the expected positive exposure to a counterparty. This incorporates a range of potential exposures across the portfolio of transactions with the counterparty over the life of the portfolio. The simulation methodology includes credit mitigants such as counterparty netting agreements and collateral agreements with the counterparty.

Where material, adjustments are made to account for ‘wrong-way risk’. Wrong-way risk arises when the underlying value of the derivative prior to any CVA is positively correlated to the probability of default by the counterparty. When there is deemed to be significant wrong-way risk, a counterparty-specific approach is applied (including adjustments for ‘gap risk’ where deemed necessary).

Own credit adjustments (DVA) on derivative instruments and credit-linked notes are based on the expectation of future exposures that counterparties will have to the Group.

23. Estimation of fair values (continued)

23.3 Credit, debit and funding valuation adjustments (CVA, DVA, and FVA) (continued)

For derivative trades, CVA is calculated by applying the probability of default (PD) of the counterparty conditional on the non-default of the Group to the expected positive exposure to the counterparty and multiplying the result by the loss given default (LGD). Conversely, DVA is calculated by applying the PD of the Group, conditional on the non-default of the counterparty, to the expected exposure that the counterparty has to the Group and multiplying by the LGD. Both calculations are performed over the life of the potential exposure. The Group takes provisions against DVA for trades where DVA calculated by the Group is not reflective of an exit price (typically for non-bank and non-collateralised counterparties). The PD of the Group has been estimated based on the market view of ICBC's credit risk, as the Group's credit risk is not directly observable.

In order to reflect the funding costs and benefits related to uncollateralised flows on derivative exposures, a funding valuation adjustment (FVA) is also applied. The FVA was calculated using similar methodology as for CVA and DVA. However, valuations were adjusted for effects related to the expected funding of the flows rather than the performance of the parties.

A summary of the Group's valuation adjustments at year end is provided below:

Type of Adjustment	**2023 $m**	2022 $m
Credit valuation adjustment	**10.9**	10.6
Debit valuation adjustment	**(2.3)**	(3.1)
Funding valuation adjustment	**(2.0)**	(5.2)
Total valuation adjustments	**6.6**	2.3
Day-1 profit or loss reserves	**36.7**	41.1
Total	**43.3**	43.4

Brackets represents an asset and credit to the income statement

A summary of the movement in the Group's day-1 profit or loss reserves in the year is provided below:

	$m
1 January 2023	**41.1**
Additions during the year	**46.6**
Releases during the year	**(51.0)**
31 December 2023	**36.7**

Day-1 profit or loss reserves arise when the fair value estimated by a valuation model is based on one or more significant unobservable inputs. The accounting for day-1 profits or losses is set out in accounting policy 5. The day-1 profit or loss reserve represents the amount that has yet to be recognised in income that relates to the difference between the fair value at initial recognition (the transaction price) and the amount that has arisen due to the valuation models containing unobservable inputs on initial recognition, less amounts subsequently recognised.

24. Classification of assets and liabilities

The tables that follow analyse assets and liabilities carried at the end of the reporting period by measurement basis. Fair values are determined for each balance sheet line item and classified into three levels depending on their valuation basis. The different levels are based on the extent to which quoted prices are used in the calculation of the fair value and the levels have been defined as follows:

Level 1 - quoted market price: assets or liabilities with quoted prices for identical assets or liabilities in active markets that the Group can access at the measurement date.

Level 2 - valuation technique using observable inputs: assets or liabilities with quoted prices for similar assets or liabilities in active markets or quoted prices for identical or similar assets or liabilities in inactive markets and assets or liabilities valued using models where all significant inputs are observable.

Level 3 - valuation technique with significant unobservable inputs: assets or liabilities valued using valuation techniques where one or more significant inputs are unobservable.

All fair valued instruments are subjected to the independent price verification (IPV) process. Level 3 items are identified where the asset or liability contains a significant exposure to a parameter that is not directly observable in the market, e.g. credit spreads, discounts rates, etc. Level 3 classification does not infer lack of comfort with the modelled price, but rather that a significant exposure within the pricing cannot be directly tested to an observable exit price, or where the observation is indicative and not testable in an active market. Classification is always determined at an instrument and not portfolio level. Transfers between levels of the fair value hierarchy are deemed to occur at the end of the reporting period.

24. Classification of assets and liabilities (continued)

The tables below set out the classification of assets and liabilities, and their fair values.

Group[5] 31 December 2023	Note	At fair value through profit or loss[1] $m	Other mandatorily held at or designated at fair value through profit or loss $m	At fair value through other comprehensive income $m	Held at amortised cost $m	Other non-financial instruments $m	Total carrying value $m	Level 1 $m	Level 2 $m	Level 3 $m	Other[2] $m	Total fair value $m
Financial assets measured at fair value												
Financial assets held for trading	5	1,278.5	-	-	-	-	1,278.5	462.6	626.1	189.8	-	1,278.5
Non-trading financial assets at fair value through profit or loss[4]	6	-	2,856.6	-	-	-	2,856.6	-	2,836.7	19.9	-	2,856.6
Derivative financial assets	7	3,383.2	-	-	-	-	3,383.2	333.0	2,980.3	69.9	-	3,383.2
Reverse repurchase agreements	8	-	1,833.9	-	-	-	1,833.9	-	1,833.9	-	-	1,833.9
Financial investments	10	-	108.9	631.7	-	-	740.6	740.6	-	-	-	740.6
		4,661.7	4,799.4	631.7	-	-	10,092.8	1,536.2	8,277.0	279.6	-	10,092.8
Financial assets carried at amortised cost[3]												
Cash and balances with central banks	3	-	-	-	2,635.9	-	2,635.9	-	-	-	2,635.9	2,635.9
Due from banks and other financial institutions	4	-	-	-	2,248.4	-	2,248.4	-	-	2,135.7	109.4	2,245.1
Reverse repurchase agreements	8	-	-	-	1,102.1	-	1,102.1	-	1,102.8	-	-	1,102.8
Loans and advances to customers	9	-	-	-	771.3	-	771.3	-	-	773.2	-	773.2
Financial investments	10	-	-	-	1,312.2	-	1,312.2	1,316.6	-	-	-	1,316.6
Other financial assets		-	-	-	7.8	-	7.8	-	-	7.8	-	7.8
		-	-	-	8,077.7	-	8,077.7	1,316.6	1,102.8	2,916.7	2,745.3	8,081.4
Other non-financial assets		4,792.2	-	-	-	284.4	5,076.6	3,877.0	915.2	-	284.4	5,076.6
Total assets		9,453.9	4,799.4	631.7	8,077.7	284.4	23,247.1	6,729.8	10,295.0	3,196.3	3,029.7	23,250.8
Financial liabilities measured at fair value												
Financial liabilities held for trading	15	1,634.7	-	-	-	-	1,634.7	205.7	1,170.4	258.6	-	1,634.7
Non-trading financial liabilities at fair value through profit or loss	16	-	3,744.0	-	-	-	3,744.0	-	3,744.0	-	-	3,744.0
Derivative financial liabilities	7	3,782.3	-	-	-	-	3,782.3	316.2	3,301.6	164.5	-	3,782.3
Repurchase agreements	18	-	156.7	-	-	-	156.7	-	156.7	-	-	156.7
		5,417.0	3,900.7	-	-	-	9,317.7	521.9	8,372.7	423.1	-	9,317.7
Financial liabilities carried at amortised cost[3]												
Due to banks and other financial institutions	17	-	-	-	6,553.2	-	6,553.2	-	-	6,551.4	-	6,551.4
Repurchase agreements	18	-	-	-	696.4	-	696.4	-	695.4	-	-	695.4
Due to customers	19	-	-	-	1,077.1	-	1,077.1	-	-	1,078.0	-	1,078.0
Subordinated debt	20	-	-	-	247.6	-	247.6	-	-	250.7	-	250.7
		-	-	-	8,574.3	-	8,574.3	-	695.4	7,880.1	-	8,575.5
Other non-financial liabilities	21	3,140.6	-	-	-	345.0	3,485.6	-	3,140.6	-	345.0	3,485.6
Total liabilities		8,557.6	3,900.7	-	8,574.3	345.0	21,377.6	521.9	12,208.7	8,303.2	345.0	21,378.8

There were no significant transfers between level 1 and level 2 in the current or prior year.

1 Includes derivative assets and liabilities held for hedging. Refer to note 7.4.
2 Represents cash and cash equivalents and other non-financial assets and liabilities held at amortised cost.
3 The fair value of financial instruments carried on the balance sheet at amortised cost is generally estimated by discounting the expected cash flows at a market discount rate adjusted for the credit spread of the obligor or, where not observable, the credit spread of borrowers of similar credit quality. In most cases, fair value approximates carrying value as instruments are short term, have interest rates that reprice frequently and/or are fully or substantially collateralised.
4 All non-trading financial assets at fair value through profit or loss are mandatorily measured at fair value through profit or loss in accordance with IFRS 9.
5 There are no material differences between Group and Company.

24. Classification of assets and liabilities (continued)

Group[5] 31 December 2022	Note	At fair value through profit or loss[1] $m	Other mandatorily held at or designated at fair value through profit or loss $m	At fair value through other comprehensive income $m	Held at amortised cost $m	Other non-financial instruments $m	Total carrying value $m	Level 1 $m	Level 2 $m	Level 3 $m	Other[2] $m	Total fair value $m
Financial assets measured at fair value												
Financial assets held for trading	5	702.7	-	-	-	-	702.7	79.6	471.6	151.5	-	702.7
Non-trading financial assets at fair value through profit or loss[4]	6	-	2,193.7	-	-	-	2,193.7	-	2,173.7	20.0	-	2,193.7
Derivative financial assets	7	4,968.0	-	-	-	-	4,968.0	544.9	4,305.3	117.8	-	4,968.0
Reverse repurchase agreements	8	-	1,470.9	-	-	-	1,470.9	-	1,470.9	-	-	1,470.9
Financial investments	10	-	-	1,293.4	1,293.4	-	1,293.4	1,293.4	-	-	-	1,293.4
		5,670.7	3,664.6	1,293.4	1,293.4	-	10,628.7	1,917.9	8,421.5	289.3	-	10,628.7
Financial assets carried at amortised cost[3]												
Cash and balances with central banks	3	-	-	-	4,856.1	-	4,856.1	-	-	-	4,856.1	4,856.1
Due from banks and other financial institutions	4	-	-	-	2,182.3	-	2,182.3	-	-	2,047.6	134.3	2,181.9
Reverse repurchase agreements	8	-	-	-	1,143.7	-	1,143.7	-	1,143.4	-	-	1,143.4
Loans and advances to customers	9	-	-	-	818.6	-	818.6	-	-	818.2	-	818.2
Other financial assets		-	-	-	44.0	-	44.0	-	-	44.0	-	44.0
		-	-	-	9,044.7	-	9,044.7	-	1,143.4	2,909.8	4,990.4	9,043.6
Other non-financial assets		2,772.2	-	-	-	181.7	2,953.9	2,284.1	488.1	-	181.7	2,953.9
Total assets		8,442.9	3,664.6	-	9,044.7	181.7	22,627.3	4,202.0	10,053.0	3,199.1	5,172.1	22,626.2
Financial liabilities measured at fair value												
Financial liabilities held for trading	15	1,295.2	-	-	-	-	1,295.2	109.6	997.0	188.6	-	1,295.2
Non-trading financial liabilities at fair value through profit or loss	16	-	2,951.2	-	-	-	2,951.2	-	2,951.2	-	-	2,951.2
Derivative financial liabilities	7	5,352.8	-	-	-	-	5,352.8	658.6	4,492.8	201.4	-	5,352.8
Repurchase agreements	18	-	188.6	-	-	-	188.6	-	188.6	-	-	188.6
		6,648.0	3,139.8	-	-	-	9,787.8	768.2	8,629.6	390.0	-	9,787.8
Financial liabilities carried at amortised cost[3]												
Due to banks and other financial institutions	17	-	-	-	6,221.9	-	6,221.9	-	-	6,232.1	-	6,232.1
Repurchase agreements	18	-	-	-	341.5	-	341.5	-	342.0	-	-	342.0
Due to customers	19	-	-	-	1,736.5	-	1,736.5	-	-	1,736.4	-	1,736.4
Subordinated debt	20	-	-	-	245.4	-	245.4	-	-	252.5	-	252.5
		-	-	-	8,545.3	-	8,545.3	-	342.0	8,221.0	-	8,563.0
Other non-financial liabilities	21	2,395.5	-	-	-	216.7	2,612.2	-	2,395.5	-	216.7	2,612.2
Total liabilities		9,043.5	3,139.8	-	8,545.3	216.7	20,945.3	768.2	11,367.1	8,611.0	216.7	20,963.0

There were no significant transfers between level 1 and level 2 in the current or prior year.

1 Includes derivative assets and liabilities held for hedging. Refer to note 7.4.
2 Represents cash and cash equivalents and other non-financial assets and liabilities held at amortised cost.
3 The fair value of financial instruments carried on the balance sheet at amortised cost is generally estimated by discounting the expected cash flows at a market discount rate adjusted for the credit spread of the obligor or, where not observable, the credit spread of borrowers of similar credit quality. In most cases, fair value approximates carrying value as instruments are short term, have interest rates that reprice frequently and/or are fully or substantially collateralised.
4 All non-trading financial assets at fair value through profit or loss are mandatorily measured at fair value through profit or loss in accordance with IFRS 9.
5 There are no material differences between Group and Company.

25. Financial instruments measured at fair value

25.1 Valuation techniques used in determining the fair value of level 2 and level 3 instruments

The following table sets out the Group's principal valuation techniques used in determining the fair value of its financial assets and financial liabilities classified within levels 2 and 3.

	Valuation basis	Main assumptions	Level 2 2023 $m	Level 2 2022 $m	Level 3 2023 $m	Level 3 2022 $m
Net derivative instruments	Discounted cash flow model (DCF)	Interest rate curve, credit curve, repurchase curve, recovery level, bond price, gap risk, exit cost, FX rate, FX volatility	**(310.7)**	(196.9)	**(93.5)**	(80.1)
	Black Scholes model	Equity volatility, FX volatility, interest rate curve, credit curve	**(10.6)**	9.4	**(1.1)**	(3.5)
			(321.3)	(187.5)	**(94.6)**	(83.6)
Financial assets held for trading	DCF	Bond price, recovery level, interest rate curve, credit curve	**626.1**	471.6	**189.8**	151.5
Non-trading financial assets at fair value through profit or loss	DCF	Bond price, recovery level, interest rate curve, credit curve	**2,836.7**	2,173.7	**16.1**	15.7
	Other	Share price, net asset value	**-**	-	**3.8**	4.3
			2,836.7	2,173.7	**19.9**	20.0
Reverse repurchase agreements	DCF	Repurchase curve, interest rate curve	**1,833.9**	1,470.9	**-**	-
Financial liabilities held for trading	DCF	Interest rate curve, credit curve, bond price, correlation	**(1,170.4)**	(997.0)	**(258.6)**	(188.6)
Non-trading financial liabilities at fair value through profit or loss	DCF	Interest rate curve, credit curve	**3,744.0)**	(2,951.2)	**-**	-
Repurchase agreements	DCF	Repurchase curve, interest rate curve	**(156.7)**	(188.6)	**-**	-
			(95.7)	(208.1)	**(143.5)**	(100.7)

25.2 Reconciliation of level 3 financial instruments

2023 Group[1]	**Net derivative instruments $m**	**Financial assets held for trading $m**	**Non-trading financial assets at fair value through profit or loss $m**	**Financial liabilities held for trading $m**	**Total $m**
Balance at beginning of the year	**(83.6)**	**151.5**	**20.0**	**(188.6)**	**(100.7)**
Total gains / (losses) included in net trading revenue	**15.8**	**49.1**	**1.3**	**(17.8)**	**48.4**
Realised	**8.3**	**16.9**	**1.5**	**6.3**	**33.0**
Unrealised	**7.5**	**32.2**	**(0.2)**	**(24.1)**	**15.4**
Purchases	**(4.7)**	**61.9**	**-**	**(83.8)**	**(26.6)**
Sales	**(25.9)**	**(85.0)**	**(1.4)**	**31.6**	**(80.7)**
Transfers into level 3[2]	**(0.1)**	**12.3**	**-**	**-**	**12.2**
Transfers out of level 3[3]	**3.9**	**-**	**-**	**-**	**3.9**
Balance at end of the year	**(94.6)**	**189.8**	**19.9**	**(258.6)**	**(143.5)**

[1] There are no material differences between Group and Company.
[2] The inputs of certain valuation models became unobservable and consequently the fair values were transferred into level 3.
[3] The inputs of certain valuation models became observable and consequently the fair values were transferred out of level 3.

25. Financial instruments measured at fair value (continued)

25.2 Reconciliation of level 3 financial instruments (continued)

2022 Group[1]	Net derivative instruments $m	Financial assets held for trading $m	Non-trading financial assets at fair value through profit or loss $m	Financial liabilities held for trading $m	Total $m
Balance at beginning of the year	(53.5)	0.3	5.1	(89.2)	(137.3)
Total gains / (losses) included in net trading revenue	(211.0)	1.6	0.3	(3.1)	(212.2)
Realised	5.2	55.3	-	(8.3)	52.2
Unrealised	(216.2)	(53.7)	0.3	5.2	(264.4)
Purchases	10.3	129.1	14.6	(48.9)	105.1
Issues	-	-	-	-	-
Sales	(9.1)	(55.3)	-	24.0	(40.4)
Settlements	-	-	-	-	-
Transfers into level 3[2]	(1.0)	75.8	-	(71.4)	3.4
Transfers out of level 3[3]	180.7	-	-	-	180.7
Balance at end of the year	(83.6)	151.5	20.0	(188.6)	(100.7)

[1] There are no material differences between Group and Company.
[2] The inputs of certain valuation models became unobservable and consequently the fair values were transferred into level 3.
[3] The inputs of certain valuation models became observable and consequently the fair values were transferred out of level 3.

25.3 Sensitivity of level 3 financial assets and liabilities and range of inputs

The table below lists key unobservable inputs to level 3 financial instruments and provides the range of those inputs at 31 December:

Group[1]	**Main assumptions**	**Range of estimates for unobservable input** **2023**	2022
Net derivative instruments	Interest rate curve, credit curve, repurchase curve, recovery level, bond price, gap risk, exit cost, FX rate, FX volatility	**Less than 1% to 33.5%**	Less than 1% to 27.3%
Financial assets held for trading	Bond price, recovery level	**0 to 103.4**	0 to 103.9
	Interest rate curve	**6.0% to 19.0%**	N/A
Non-trading financial assets at fair value through profit or loss	Bond price, recovery level	**0 to 5.4**	0 to 5.4
	Credit curve	**2.1% to 2.3%**	2.9% to 3.1%
	Share price, net asset value	**10%**	10%
Financial liabilities held for trading	Interest rate curve, credit curve, correlation	**2.1% to 16.3%**	2.9% to 8.8%
	Bond price	**78.3 to 103.4**	96.5 to 103.9
	Net asset value	**10%**	10%

[1] There are no material differences between Group and Company.

The fair value of level 3 financial instruments is determined using valuation techniques which incorporate assumptions based on unobservable inputs and are subject to management's judgement. Although the Group believes that its estimates of fair values are appropriate, changing one or more of these assumptions to reasonably possible alternative values could impact the fair value of the financial instruments. The table below indicates the effect that a change of unobservable inputs to reasonably possible alternatives (1% up or down) would have on profit or loss at the reporting date. Level 3 instruments contain sensitivities to both observable and unobservable parameters. The table below measures the sensitivity to unobservable parameters only. These positions are risk managed using various instruments of which the associated gains or losses are not reflected in the table below.

25. Financial instruments measured at fair value (continued)

25.3 Sensitivity of level 3 financial assets and liabilities and range of inputs (continued)

		Effect recorded in profit or loss			
		2023		2022	
		Favourable	(Adverse)	Favourable	(Adverse)
Group[1]	**Main assumptions**	**$m**	**$m**	**$m**	**$m**
Net derivative instruments	Interest rate curve, credit curve, repurchase curve, recovery level, bond price, gap risk, exit cost, FX rate, FX volatility	**2.3**	**(2.3)**	1.9	(1.9)
Financial assets held for trading	Bond price, recovery level, interest rate curve	**17.1**	**(17.1)**	12.1	(12.1)
Non-trading financial assets at fair value through profit or loss	Bond price, recovery level, credit curve, share price, net asset value	**0.7**	**(0.7)**	0.9	(0.9)
Financial liabilities held for trading	Interest rate curve, credit curve, correlation, bond price, net asset value	**17.9**	**(17.9)**	13.4	(13.4)

[1] There are no material differences between Group and Company.

26. Offsetting of financial assets and financial liabilities

Financial assets and liabilities are offset and the net amount reported in the balance sheet when the Group currently has a legally enforceable right to set-off the recognised amounts and there is an intention to settle the asset and the liability on a net basis, or to realise the asset and settle the liability simultaneously. Certain derivative assets and liabilities met these criteria and US$6,659.1 million (2022: US$3,803.3 million) and US$6,481.9 million (2022: US$3,803.3 million), respectively, were offset in the current year.

The Group also receives and places collateral in the form of cash and marketable securities in respect of derivative transactions, sale and repurchase agreements, and reverse sale and repurchase agreements. This collateral is subject to standard industry terms such as the ISDA credit support annex and other similar agreements. This means that securities received or given as collateral can be pledged or sold during the term of the transaction but must be returned on maturity of the transaction. The terms also give each counterparty the right to terminate the related transactions upon the counterparty's failure to post collateral. In certain circumstances, for example when a credit event such as a default occurs, all outstanding transactions under the agreement are terminated, the termination value is assessed and only a single net amount is due or payable in settlement of all transactions.

The disclosure set out in the tables below reflects financial assets and liabilities that have been offset in the balance sheet in accordance with IAS 32 *Financial Instruments: Presentation*, as well as financial instruments that are subject to enforceable master netting arrangements or similar agreements, irrespective of whether they have been offset in the balance sheet.

26. Offsetting of financial assets and financial liabilities (continued)

Financial assets and liabilities subject to offsetting, enforceable master netting arrangements and similar agreements 2023	**Gross $m**	**Amounts offset in the balance sheet[1] $m**	**Net amounts included in the balance sheet $m**	**Amounts that could be offset in the event of counterparty default[2] Non-cash collateral received / pledged $m**	**Amounts that could be offset in the event of counterparty default[2] Cash collateral received / pledged $m**	**Net amount $m**
Assets in scope						
Derivative financial assets	**10,042.3**	**(6,659.1)**	**3,383.2**	**(2,399.3)**	**(412.4)**	**571.5**
Reverse repurchase agreements	**2,936.0**	**-**	**2,936.0**	**(2,936.0)**	**-**	**-**
Total financial assets in scope	**12,978.3**	**(6,659.1)**	**6,319.2**	**(5,335.3)**	**(412.4)**	**571.5**
Liabilities in scope						
Derivative financial liabilities	**10,264.2**	**(6,481.9)**	**3,782.3**	**(2,399.3)**	**(610.7)**	**772.3**
Repurchase agreements	**853.1**	**-**	**853.1**	**(853.1)**	**-**	**-**
Total financial liabilities in scope	**11,117.3**	**(6,481.9)**	**4,635.4**	**(3,252.4)**	**(610.7)**	**772.3**

Financial assets and liabilities subject to offsetting, enforceable master netting arrangements and similar agreements 2022	Gross $m	Amounts offset in the balance sheet[1] $m	Net amounts included in the balance sheet $m	Amounts that could be offset in the event of counterparty default[2] Non-cash collateral received / pledged $m	Amounts that could be offset in the event of counterparty default[2] Cash collateral received / pledged $m	Net amount $m
Assets in scope						
Derivative financial assets	8,771.3	(3,803.3)	4,968.0	(3,892.2)	(666.4)	409.4
Commodity reverse repurchase agreements	60.8	-	60.8	(60.8)	-	-
Reverse repurchase agreements	2,614.6	-	2,614.6	(2,614.6)	-	-
Total financial assets in scope	11,446.7	(3,803.3)	7,643.4	(6,567.6)	(666.4)	409.4
Liabilities in scope						
Derivative financial liabilities	9,156.1	(3,803.3)	5,352.8	(3,892.2)	(613.2)	847.4
Repurchase agreements	530.1	-	530.1	(530.1)	-	-
Total financial liabilities in scope	9,686.2	(3,803.3)	5,882.9	(4,422.3)	(613.2)	847.4

1 Amounts offset for derivative financial assets additionally includes cash collateral netted of US$251.0 million (2022: US$nil). Amounts offset for derivative financial liabilities additionally includes cash collateral netted of US$73.8 million (2022: US$nil).
2 Represents netting arrangements that can be applied in the event of default, together with collateral held against exposures.

27. Ordinary share capital

	2023 $m	2022 $m
Issued and fully paid		
1,083,458,378 ordinary shares of US$1 each (2022: 1,083,458,378)	**1.083.5**	1,083.5

28. Other equity instruments

The additional tier 1 (AT1) securities (Notes) issued in December 2019 are perpetual, with no fixed redemption date, callable by the issuer in its sole and absolute discretion (in whole, but not in part) after five-years or any date thereafter at their par value plus accrued but unpaid interest. The Notes are subordinate to any existing tier 2 instruments issued by ICBCS and senior to its ordinary shares.

The Notes pay interest annually for five-years at a fixed rate of 7.617 per cent and subsequently pay interest quarterly in perpetuity at a floating rate of SOFR plus 462 basis points. Interest payments are non–cumulative, payable at the sole and absolute discretion of the issuer and will be mandatorily cancelled to the extent required if there are insufficient distributable reserves to make payment.

The Notes include a write down feature, whereby their full principal amount and all accrued but unpaid interest will be written down to zero if ICBCS's fully loaded common equity tier 1 ratio falls below 7.0 per cent.

The Company paid a coupon on the AT1 securities of US$12.2 million in December 2023 (2022: US$12.2 million).

29. Contingent liabilities and commitments

29.1 Contingent liabilities

Loan commitments that are irrevocable over the life of the facility or revocable only in response to material adverse changes are included in the risk management section in note 37.4.

29.2 Provisions

	Restructuring provision $m	Legal proceedings and regulatory matters $m	Total $m
1 January 2023	**1.6**	-	**1.6**
Arising during the year	-	**10.8**	**10.8**
Utilised during the year	**(0.8)**	-	**(0.8)**
31 December 2023	**0.8**	**10.8**	**11.6**

The restructuring provision was created in 2019 with the commencement of the reorganisation of the Group's activities and operations to align with its revised strategic objectives. The restructuring was completed during 2020, except for the closure of the Hong Kong branch, which was completed in August 2021. The remaining provision relates to rates and service charges for the vacant space in the Group's London office premises, which will be utilised over the remaining term of the lease for that property, which expires in September 2024.

Further details of the provisions relating to legal proceedings and regulatory matters are provided in note 29.3 below.

29. Contingent liabilities and commitments (continued)

29.3 Legal proceedings and regulatory matters

From time to time, the Group is the subject of litigation, regulatory reviews and requests for information by various governmental and regulatory bodies arising from its business operations. As set out in Note 2.2, provisions for legal proceedings and regulatory matters typically require a high degree of judgement and there can be a wide range of possible outcomes and uncertainties often making it impracticable to estimate the amount of any outflows that may arise. Notwithstanding this, in December 2023, the Bank recognised a provision of US$10.8 million in respect of litigation, primarily in relation to the estimated legal costs of defending certain claims as they progress through the courts or other stages of the litigation process. The allocation of this provision to individual claims has not been disclosed as doing so would be seriously prejudicial to the Bank’s position. The key legal proceedings currently being pursued against the Group are summarised below:

- The Group is defending a putative class action lawsuit filed in New York in November 2014 against it and a number of other institutions for unquantified damages arising from an alleged conspiracy to manipulate and rig the global benchmark prices for physical platinum and palladium, and related derivative financial products. The Bank’s request to review the Appeal Court’s decision on jurisdiction has been declined by the US Supreme Court and a decision on the summary judgement motion on behalf of all defendants remains pending.
- In February 2017, the South African Competition Commission (SACC) filed a referral affidavit with the South African Competition Tribunal alleging collusive behaviour in the trading of foreign currency pairs involving the Rand between 2007 and 2013. The allegations are made against over twenty institutions, including ICBCS's US subsidiaries. In January 2024, the South African Competition Appeals Court upheld appeals dismissing the Bank’s US subsidiaries from the proceedings. The SACC is appealing the decision in respect of Standard Americas Inc (and other banks) but not Standard New York Securities Inc. The defendants are in the process of filing objections to SACC’s appeal.
- A client of the Bank’s legacy excluded business is litigating against the ultimate borrower with respect to repayment of its defaulted debt obligations. ICBCS has also needed to issue protective proceedings against the ultimate borrower to prevent limitations occurring that could prejudice its future ability to enforce the debt. The client concerned has also made certain allegations against the Bank in respect of its administration of the legacy business. Although these are strongly denied, discussions on this matter remain ongoing.
- In August 2021, a putative class action lawsuit was filed in New York against ViacomCBS Inc (Viacom) and the 21 underwriters to its common and mandatory convertible preferred stock offerings in March 2021. ICBCS was an underwriter to the mandatory convertible preferred stock offering. The complaint alleges a failure to disclose the risk posed to Viacom's stock price by a portfolio of total return swaps held by Archegos Capital Management (Archegos), which had collapsed in March 2021. ICBCS had no relationship with Archegos. The defendants are appealing the decision rejecting their motion to dismiss. A hearing date is awaited.

30. Supplementary income statement information

30.1 Interest income[1]

Group	2023 $m	2022 $m
Interest on loans and advances and short-term funds	**429.1**	237.3
Interest on debt securities held at FVOCI	**61.4**	17.5
Interest on debt securities held at amortised cost	**34.2**	-
	524.7	254.8
Included above are the following amounts receivable from related parties:		
Transactions with ultimate holding company (ICBC Limited) and subsidiaries and branches	**2.1**	1.0
Transactions with shareholder with significant influence (SBG) and subsidiaries and branches	**5.0**	1.4
	7.1	2.4

[1] All interest income reported above relates to financial assets not carried at fair value through profit or loss.

30.2 Interest expense[1]

Group	2023 $m	2022 $m
Subordinated debt	**15.5**	15.2
Other interest-bearing liabilities[2]	**355.3**	141.1
	370.8	156.3
Included above are the following amounts payable to related parties:		
Transactions with ultimate holding company (ICBC Limited) and subsidiaries and branches	**188.7**	90.9
Transactions with shareholder with significant influence (SBG) and subsidiaries and branches	**22.4**	7.1
	211.1	98.0

[1] All interest expense reported above relates to financial liabilities not carried at fair value through profit or loss, and leasehold liabilities.
[2] Interest expense net of charge to net trading revenue as per accounting policy 15.

30.3 Non-interest revenue

	2023 $m	2022 $m
Net fees and commission[1]	**38.6**	25.4
Net trading revenue	**314.0**	400.6
Commodities	**122.6**	165.1
FIC	**191.0**	233.1
Other	**0.4**	2.4
Net gain on non-trading financial assets and liabilities at fair value through profit or loss	**51.5**	51.7
Recoveries on commodity inventory intermediation (note 30.4)	**-**	233.7
	404.1	711.4
Included above are the following amounts with related parties:		
Transactions with ultimate holding company (ICBC Limited) and subsidiaries and branches	**(2.5)**	(11.0)
Transactions with shareholder with significant influence (SBG) and subsidiaries and branches	**33.4**	21.6
	30.9	10.6

[1] Includes revenue sharing arrangements on transactions with ICBC companies comprising receipts of US$5.5 million (2022: US$5.0 million) and payments of US$12.9 million (2022: US$5.1 million), and revenue sharing arrangements on transactions with SBG companies comprising receipts of US$17.3 million (2022: US$12.9 million). There were no payments to SBG companies in 2023 (2022: US$nil).

Fee and commission income from contracts with customers in the scope of IFRS 15 is disaggregated by business unit in note 1. Fee and commission income from contracts with customers is measured based on the consideration specified in a contract with a customer. The Group recognises revenue when it transfers control over a service to a customer or when the service is complete, depending on the nature of the contract and the service provided. The following table provides information about the nature and timing of the satisfaction of performance obligations in contracts with customers and the related revenue recognition policies.

30. Supplementary income statement information (continued)

30.3 Non-interest revenue (continued)

Business unit	Nature and timing of satisfaction of performance obligations	Revenue recognition
Commodities	The Group provides vaulting and clearing services to clients in its precious metals business. The fees for these services principally comprise storage and transfer fees.	Revenue related to storage services is recognised over time reflecting the provision of the storage service on a continuous basis over the storage term.
	Storage fees are set at fixed rates per amount of metal stored. Transfer fees are transaction based.	Revenue related to transfers is recognised at the point in time when the transfer is complete.
	The Group leases metals to and from clients in its precious metals business. The fees for these services are based on the value of the metal leased and the agreed lease rate.	Revenue related to metal leases is recognised over time throughout the term of the lease and is paid on termination of the lease.
FIC	The Group provides brokerage services for its clients on securities trades. Fees for these services are transaction based.	Revenue related to brokerage services is recognised at the point in time when the transaction is complete.
	The Group's debt capital markets (DCM) business provides various finance related services, including debt underwriting and other advisory services. Fees received for these services are transaction based.	Revenue related to transactions in the Group's DCM business is recognised at the point in time when the transaction is complete.
All	The Group provides guarantees to various clients. Fees received for these services are based on the value of the guarantee provided, the creditworthiness of the obligor and the term of the guarantee.	Revenue related to guarantees is recognised over time throughout the term of the guarantee.

The following table provides information about receivables and contract liabilities from contracts with customers:

	2023 $m	2022 $m
Receivables, included in other assets	**14.7**	21.1
Contract liabilities, included in other liabilities	**(6.2)**	(3.8)

The contract receivables principally relate to vaulting and clearing services provided by the Group and sales credits due to the Group on revenue sharing arrangements on certain transactions with ICBC and SBG group companies. All amounts due at year end had been recognised in revenue. The contract liabilities primarily relate to fees payable to other ICBC group companies under revenue sharing arrangements relating to transactions undertaken by the Group’s debt capital markets business and fees payable for vaulting and clearing services received by the Group.

30.4 Recoveries on commodity inventory intermediation

In 2019, the Group incurred material losses on its commodity inventory intermediation activities following a fire at a client’s oil refinery site and their subsequent bankruptcy. In January 2022, the US Bankruptcy Court approved a settlement agreement with the client's insurers in respect of the business interruption insurance claims. The approval of this settlement accounted for the majority of the US$233.7 million compensation received during the year ended 31 December 2022 for the losses incurred as a result of this incident. There were no further recoveries in 2023.

30. Supplementary income statement information (continued)

30.5 Credit impairment recoveries / (charges)

	2023 $m	2022 $m
Stage 1: 12-month ECL	**(5.9)**	(2.4)
Due from banks and other financial institutions	**(2.9)**	0.1
Loans and advances to customers	**0.3**	(1.4)
Commitments and financial guarantees given	**(3.3)**	(1.1)
Stage 2: Lifetime ECL - not credit-impaired	**3.8**	(3.5)
Due from banks and other financial institutions	**3.8**	(3.5)
Stage 3: Lifetime ECL - credit-impaired	**4.1**	(4.1)
Due from banks and other financial institutions	**4.1**	(4.1)
Purchased or Originated Credit Impaired (POCI)	**48.2**	(50.8)
Other assets	**48.2**	(50.8)
Net credit impairment recoveries / (charges)	**50.2**	(60.8)

30.6 Staff costs

	2023 $m	2022 $m
Salaries and allowances	**192.9**	179.2
Social security costs	**22.8**	21.8
Other direct staff costs	**11.8**	7.8
Long-term incentive schemes	**10.4**	6.1
Retirement benefit costs	**9.9**	9.0
	247.8	223.9

Certain comparative amounts have been reclassified to conform to the current year's presentation.

30.7 Other operating expenses

	2023 $m	2022 $m
Auditors' remuneration	**4.3**	4.4
Audit of ICBC Standard Bank Plc Company	**3.6**	3.7
Audit of subsidiaries[1]	**0.5**	0.4
Audit related assurance services	**0.2**	0.3
Depreciation	**17.5**	18.2
Computer equipment	**3.2**	3.9
Office equipment	**0.4**	0.4
Furniture and fittings	**1.6**	1.6
Right of use lease assets	**12.3**	12.3
Information technology and communication	**53.3**	52.9
Infrastructure and IT development costs	**32.8**	27.8
Resource Costs	**23.5**	17.5
Amortisation of intangible assets	**9.6**	11.0
Technology, communication and market data	**0.6**	0.3
Other expenses (including R&D tax reclaim)	**(0.9)**	(1.0)
Premises	**6.8**	6.8
Other expenses	**31.2**	37.8
	145.9	147.9

[1] Includes US$0.3 million (2022: US$0.3 million) in respect of fees for audit services to firms other than Deloitte.

Certain comparative amounts have been reclassified to conform to the current year's presentation.

30.8 Indirect taxation

	2023 $m	2022 $m
Value added tax	**3.9**	0.5
Excise duty	**-**	1.3
	3.9	1.8

30. Supplementary income statement information (continued)

30.9 Deferred compensation

The provision in respect of liabilities under the Group's deferred compensation schemes amounts to US$35.9 million (quanto stock units US$16.6 million, ICBCS notional shares US$1.9 million, deferred cash US$17.4 million) at 31 December 2023 (2022: US$29.6 million), and the charge for the year is US$16.3 million (quanto stock units US$7.2 million, ICBCS notional shares US$1.9 million, deferred cash US$7.2 million) (2022: US$12.3 million, quanto stock units US$6.2 million, deferred cash US$6.1 million). The change in liability relating to the quanto stock units due to changes in the ICBC share price is materially hedged through the use of equity options designated as cash flow hedges (see note 7.4.1).

The provision amount at 31 December 2023 related to fully vested quanto stock unit awards was US$3.5 million (2022: US$3.7 million). There were no fully vested deferred cash awards that were unpaid at 31 December 2023 (2022: US$nil).

ICBC quanto stock units	2023 Units	2022 Units
Units outstanding at beginning of the year	**3,705,371**	2,570,189
Granted	**3,514,472**	2,692,874
Exercised	**(2,094,787)**	(1,523,613)
Leavers / lapses	**(113,231)**	(34,079)
Units outstanding at end of the year	**5,011,825**	3,705,371
Of which relates to key management	**712,444**	552,167

The following ICBC quanto stock units granted to employees had not been exercised at 31 December:

Expiry year[1]	2023 Units[2]	2022 Units[3]
2022	**-**	795,487
2023	**956,696**	803,536
2024	**1,247,035**	811,391
2025	**987,031**	559,617
2026	**888,278**	421,805
2027	**540,359**	215,945
2028	**287,817**	64,905
2029	**68,647**	32,685
2030	**35,962**	-
	5,011,825	3,705,371

[1] The units vest at various intervals between the reporting date and the expiry date, the above table does not include units awarded on 1 March 2024.

[2] Excludes units awarded on 1 March 2024 for the performance period ended 31 December 2023.

[3] Excludes units awarded on 1 March 2023 for the performance period ended 31 December 2022.

Deferred awards of US$15.6 million (2022: US$17.8 million) have been approved for issue in March 2024. This is split into ICBCS notional share awards of US$6.5 million (2022: US$nil) and deferred cash awards of US$9.1 million (2022: US$8.9 million). No quanto stock units will be issued in March 2024 (2022: US$8.9 million).

The unrecognised compensation cost related to all unvested awards amounts to US$21.4 million (2022: US$21.1 million). The ICBCS notional share element of this is US$4.2 million (2022: US$nil), with US$5.8 million being quanto stock units (2022: US$10.5 million) and US$11.4 million being deferred cash awards (2022: US$10.6 million). These represent the accumulated amount deferred on awards issued and approved. The vesting of these awards in the income statement is expected to occur as follows:

30. Supplementary income statement information (continued)

30.9 Deferred compensation (continued)

	2023 $m	2022 $m
Year ending 31 December 2023	-	9.6
Year ending 31 December 2024	9.8	5.9
Year ending 31 December 2025	6.0	3.3
Year ending 31 December 2026	3.3	1.4
Year ending 31 December 2027	1.5	0.6
Year ending 31 December 2028	0.5	0.2
Year ending 31 December 2029	0.2	0.1
Year ending 31 December 2030	0.1	-
	21.4	21.1

30.10 Directors' emoluments

Directors [1,2,3]	2023 $m	2022 $m
Emoluments of directors in respect of services rendered		
Emoluments[4]	4.0	3.5
Proceeds from exercise of share-based incentives	0.4	0.5
Highest paid director		
Emoluments	1.2	1.1
Proceeds from exercise of share-based incentives	0.2	0.1

[1] Compensation relates to services rendered to the Group. No payments were made on the Group's behalf by entities consolidated into the ultimate holding company (ICBC Limited) and the shareholder with significant influence (SBG) (2022: US$nil).

[2] No pension contributions were paid on behalf of directors for 2023 and 2022.

[3] The number of directors to whom retirement benefits were accruing under defined contribution plans in respect of qualifying services for 2023 was nil (2022: nil).

[4] Directors' emoluments are paid in sterling and totalled £3.4 million for 2023 (2022: £3.0 million).

Long-term benefits under the ICBC quanto stock unit plan	2023 Units	2022 Units
Number of units brought forward	283,106	220,483
Issued during the year	168,279	163,368
Exercised	(90,954)	(100,745)
As at 31 December	360,431	283,106

30.11 Company profits

As permitted by section 408 of the Companies Act 2006, the Company's statement of comprehensive income has not been presented. The Company's profit of US$184.8 million (2022: US$311.2 million) has been included in the consolidated income statement.

30.12 Dividends

No dividend has been paid or declared on the ordinary shares by the Company since the end of the previous financial year (2022: US$nil). The directors are considering a final dividend payment in respect of the financial year ended 31 December 2023, but no dividend has been recommended at the date of these financial statements.

31. Income tax charge

	2023 $m	2022 $m
Current year tax charge	**(25.6)**	(58.1)
UK current tax	**(24.6)**	(44.1)
UK deferred tax	**7.3**	-
Overseas withholding tax	**(4.9)**	(10.2)
Overseas current tax	**(3.4)**	(3.5)
Overseas deferred tax	**-**	(0.3)
Prior years	**2.1**	(0.3)
UK current tax	**3.0**	(0.2)
Overseas tax	**(1.0)**	(0.3)
Overseas deferred tax	**0.1**	0.2
Total tax charge	**(23.5)**	(58.4)

UK tax rate reconciliation

With effect from 1 April 2023, the standard rate of UK corporation tax increased from 19% to 25%, the rate of bank surcharge decreased from 8% to 3% and the surcharge allowance increased from £25 million to £100 million. Therefore, the UK corporation tax rate for the year ended 31 December 2023 was 23.5% (2022: 19.0%). The difference between the actual tax charge and the tax that would result from applying the standard UK corporation tax rate to the Group's profit before tax is explained below.

	2023 $m	2022 $m
Profit before taxation	**210.6**	375.5
Tax charge at the standard rate of 23.5% (2022: 19%)	**(49.5)**	(71.3)
Effects of:		
Banking surcharge	**(5.8)**	(11.6)
Net impact of overseas tax[1]	**(3.5)**	(8.3)
Impact of changes in foreign exchange rates	**(0.3)**	(3.2)
Non-deductible expenses	**(0.1)**	(0.2)
Different tax rates in other countries	**-**	(0.2)
Adjustment to tax in respect of prior years	**2.1**	(0.3)
Tax relief on payments made under AT1 instruments[2]	**2.9**	2.3
Tax charge included in the income statement before deferred tax items	**(54.2)**	(92.8)
Origination / reversal of temporary differences not recognised	**0.8**	1.8
Deferred tax asset not previously recognised	**7.3**	-
Utilisation of tax losses for which no deferred tax was recognised	**22.6**	32.6
Tax charge included in the income statement	**(23.5)**	(58.4)
Effective tax rate (%) based on:		
Tax charge included in the income statement before deferred tax items	**25.7**	24.7
Tax charge included in the income statement	**11.2**	15.6

1 Mostly relates to interest income received by the Company which is subject to withholding tax imposed in the country of origin. Income that is subject to such tax is recognised gross of the taxes and the corresponding withholding tax is recognised as a tax expense.

2 The Company's AT1 coupon payments are tax deductible. In accordance with IAS 12, the income tax consequences of tax deductible distributions, including AT1 coupon payments, are recorded in the income statement tax expense.

31. Income tax charge (continued)

Global minimum top-up tax

On 11 July 2023, Finance (No.2) Act 2023 was enacted in the UK, introducing a global minimum effective tax rate of 15 per cent. The legislation implements a domestic top-up tax and a multinational top-up tax, effective for accounting periods commencing on or after 31 December 2023. The Group may be subject to the top-up tax in relation to its operations in the UK, where tax deductions reduce its effective tax rate to below 15 per cent. However, since the newly enacted tax legislation in the UK is only effective from 1 January 2024, there is no current tax impact for the year ended 31 December 2023.

In accordance with the amendments made to IAS 12 in May 2023 in relation to the Pillar Two Model Rules (see accounting policy 1), the Group has applied a temporary mandatory relief from deferred tax accounting for the impacts of the top-up tax and accounts for it as a current tax when it is incurred.

If the top-up tax had applied in 2023, the profits relating to the Group's operations in the UK for the year ended 31 December 2023 would have been subject to an average effective tax rate in excess of the 15 per cent minimum rate imposed by the Pillar 2 Model Rules. Therefore, no top-up tax would have been incurred in the UK for the year ended 31 December 2023.

32. Notes to the cash flow statement

32.1 (Increase) / decrease in income-earning assets

	Group		Company	
	2023	**2022**	**2023**	**2022**
	$m	**$m**	**$m**	**$m**
Financial assets held for trading	**(575.8)**	1,753.0	**(575.8)**	1,753.0
Non-trading financial assets at fair value through profit or loss	**(662.9)**	(221.6)	**(662.9)**	(221.6)
Loans and advances[1]	**(378.5)**	627.9	**(395.7)**	631.6
Other assets	**(2,006.7)**	1,192.6	**(2,006.4)**	1,191.9
Financial investments	**(758.5)**	(370.4)	**(758.5)**	(370.4)
	(4,382.4)	2,981.5	**(4,399.3)**	2,984.5

[1] Consists of Due from banks and other financial institutions, Reverse repurchase agreements and Loans and advances to customers.

32.2 Increase / (decrease) in interest bearing and non-interest bearing liabilities

	Group		Company	
	2023	**2022**	**2023**	**2022**
	$m	**$m**	**$m**	**$m**
Deposits[1]	**29.5**	(5,080.5)	**29.5**	(5,080.5)
Net derivative instruments	**32.6**	(281.3)	**32.6**	(281.3)
Financial liabilities held for trading	**339.5**	(271.3)	**339.5**	(271.3)
Non-trading financial liabilities at fair value through profit or loss	**793.1**	850.4	**793.1**	850.4
Other liabilities	**799.9**	192.8	**808.8**	200.7
	1,994.6	(4,589.9)	**2,003.5**	(4,582.0)

[1] Consists of Due to banks and other financial institutions, Repurchase agreements and Due to customers.

32.3 Corporation and withholding tax paid

	Group		Company	
	2023	**2022**	**2023**	**2022**
	$m	**$m**	**$m**	**$m**
Amounts unpaid at beginning of the year	**2.0**	1.6	**2.7**	1.4
Income tax charge	**(23.5)**	(58.4)	**(22.7)**	(56.6)
Non-cash movements	**(6.1)**	4.2	**(6.0)**	3.9
Amounts unpaid / (receivable) at end of the year	**(9.4)**	(2.0)	**(9.1)**	(2.7)
	(37.0)	(54.6)	**(35.1)**	(54.0)

32. Notes to the cash flow statement (continued)

32.4 Cash and cash equivalents

	Group		Company	
	2023	2022	2023	2022
	$m	$m	$m	$m
Balances with central banks	**2,635.9**	4,856.1	**2,635.9**	4,856.1
Other cash equivalents[1]	**108.5**	134.3	**83.8**	126.6
Cash and cash equivalents at end of the year	**2,744.4**	4,990.4	**2,719.7**	4,982.7

[1] Other cash equivalents include overnight placements that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value.

32.5 Reconciliation of liabilities arising from financing activities

Group and Company 2023	**Opening balance $m**	**Cash flow movements $m**	**Non-cash flow movements $m**	**Closing balance $m**
Subordinated debt	**245.4**	**-**	**2.2**	**247.6**
Total	**245.4**	**-**	**2.2**	**247.6**

Group and Company 2022	Opening balance $m	Cash flow movements $m	Non-cash flow movements $m	Closing balance $m
Subordinated debt	250.8	-	(5.4)	245.4
Total	250.8	-	(5.4)	245.4

33. Related party transactions

33.1 Subsidiaries

The subsidiary companies listed in note 14 comprise a limited part of the Group's activities and transactions with these entities are not significant. The principal nature of the transactions are payments for business introduced and trading facilitation activities. Intercompany transactions, balances and unrealised surpluses and deficits are eliminated on consolidation.

33.2 ICBC and SBG related parties

The Group entered into transactions with other entities forming part of the ICBC Group and Standard Bank Group. The transactions were entered into in the course of banking operations and were conducted in the ordinary course of business at arm's length, and on substantially the same terms, including interest rates and security, as for comparable transactions with third parties. These transactions include funding and acceptance of interbank deposits, lending, derivative transactions and correspondent banking transactions. The transactions were priced at the prevailing market rates at the time of the transactions. A significant portion of this activity reflects funding and deposits of precious metal holdings, as well as the deposit of excess liquidity by other entities within the ICBC and Standard Bank groups. The extent of these activities is presented in notes 15, 16, 17, 18, 20 and 21. As part of its normal activities, the Group also advanced funds to other entities within the ICBC and Standard Bank groups, the extent of which is disclosed in notes 4 and 8. Balances arising from derivative transactions are shown in note 7.1.

33. Related party transactions (continued)

33.3 Key management compensation

Key management comprises directors of ICBCS and members of the executive committee.

	2023 $m	2022 $m
Salaries and other short-term benefits	**6.5**	5.8
Long-term incentives recognised in the income statement	**1.6**	1.7
Amounts included in the income statement	**8.1**	7.5
Proceeds on exercise of long-term incentives	**0.9**	0.9

There were no other transactions with key management in 2023 (2022: none).

The average key management consists of 15 employees (2022: 15 employees).

34 Pensions and other post-retirement benefits

The Group makes defined contributions to employees' pension providers. The assets of these providers are held separately from the Group. Included in staff costs are contributions paid for pensions and other post-retirement benefits which amounted to US$9.9 million (2022: US$9.0 million). There were no outstanding contributions at the end of the reporting period (2022: US$nil).

35 Subsequent events

No material adjusting or non-adjusting events have occurred between the balance sheet date and the date the annual financial statements have been approved for issue, which would require disclosure in the Group's financial statements.

36. Maturity analysis

The Group assesses the maturity of its assets and liabilities at 31 December each year. This gives an indication of the remaining life of these assets and liabilities at that point in time. The following table illustrates the maturities based on a contractual discounted basis. For the maturity analysis of financial liabilities on a contractual undiscounted basis, refer to the 'Structural Requirements' section, within the Liquidity Risk section (note 37.6).

36. Maturity analysis (continued)

Group - 31 December 2023	Repayable on demand	Maturing within 1 month	Maturing after 1 month but within 3 months	Maturing after 3 months but within 6 months	Maturing after 6 months but within 12 months	Maturing after 12 months but within 5 years	Maturing after 5 years	Undated	Total
	$m	$m	$m	$m	$m	$m	$m	$m	$m
Assets									
Cash and balances with central banks	2,635.9	-	-	-	-	-	-	-	**2,635.9**
Due from banks and other financial institutions	1,538.0	-	52.0	53.2	118.0	487.2	-	-	**2,248.4**
Financial assets held for trading	-	382.5	19.4	29.2	194.5	321.5	331.4	-	**1,278.5**
Non-trading financial assets at fair value through profit or loss	250.3	162.1	335.4	-	1,994.0	111.0	-	3.8	**2,856.6**
Derivative financial assets	101.1	585.0	759.0	508.7	529.4	727.2	172.8	-	**3,383.2**
Reverse repurchase agreements	452.3	972.3	1,024.0	387.7	23.5	7.3	68.9	-	**2,936.0**
Loans and advances to customers	65.6	-	-	-	34.6	524.7	146.4	-	**771.3**
Financial investments	-	20.6	47.2	56.3	123.8	1,749.8	55.1	-	**2,052.8**
Property and equipment	-	-	-	-	-	-	-	66.9	**66.9**
Current tax assets	-	-	-	-	-	-	-	11.8	**11.8**
Deferred tax assets	-	-	-	-	-	-	-	8.0	**8.0**
Other assets	169.7	7.3	0.1	-	-	0.1	0.6	4,819.9	**4,997.7**
Total assets	**5,212.9**	**2,129.8**	**2,237.1**	**1,035.1**	**3,017.8**	**3,928.8**	**775.2**	**4,910.4**	**23,247.1**
Liabilities									
Financial liabilities held for trading	2.2	537.1	329.4	161.4	43.8	495.7	65.1	-	**1,634.7**
Non-trading financial liabilities at fair value through profit or loss	4.8	294.6	73.6	298.2	2,359.5	713.3	-	-	**3,744.0**
Derivative financial liabilities	34.3	736.3	802.6	504.7	533.3	882.1	289.0	-	**3,782.3**
Due to banks and other financial institutions	1,527.6	1,555.3	374.2	119.1	437.7	2,536.1	3.2	-	**6,553.2**
Repurchase agreements	72.0	439.9	156.7	14.4	14.4	155.7	-	-	**853.1**
Due to customers	490.0	100.7	486.4	-	-	-	-	-	**1,077.1**
Current tax liabilities	-	-	-	-	-	-	-	2.4	**2.4**
Subordinated debt	-	-	-	-	-	-	247.6	-	**247.6**
Other liabilities	3,392.2	2.8	-	0.3	-	8.5	1.1	76.9	**3,481.8**
Total liabilities	**5,523.1**	**3,666.7**	**2,222.9**	**1,098.1**	**3,388.7**	**4,791.4**	**606.0**	**79.3**	**21,376.2**

Undated other assets include commodities held at fair value. Other liabilities payable on demand include obligations to return commodity balances placed with the Group.

36. Maturity analysis (continued)

Company - 31 December 2023	Repayable on demand	Maturing within 1 month	Maturing after 1 month but within 3 months	Maturing after 3 months but within 6 months	Maturing after 6 months but within 12 months	Maturing after 12 months but within 5 years	Maturing after 5 years	Undated	Total
	$m	$m	$m	$m	$m	$m	$m	$m	$m
Assets									
Cash and balances with central banks	2,635.9	-	-	-	-	-	-	-	**2,635.9**
Due from banks and other financial institutions	1,476.8	-	52.0	53.2	118.0	487.3	-	-	**2,187.3**
Financial assets held for trading	-	382.5	19.3	29.2	194.5	321.6	331.4	-	**1,278.5**
Non-trading financial assets at fair value through profit or loss	250.3	162.1	335.5	-	1,994.0	110.9	-	3.8	**2,856.6**
Derivative financial assets	101.1	585.0	759.1	508.7	529.4	727.1	172.8	-	**3,383.2**
Reverse repurchase agreements	452.3	972.3	1,024.0	387.7	23.5	7.3	68.9	-	**2,936.0**
Loans and advances to customers	65.6	-	-	-	34.6	524.7	146.4	-	**771.3**
Financial investments	-	20.6	47.2	56.3	123.9	1,749.7	55.1	-	**2,052.8**
Property and equipment	-	-	-	-	-	-	-	63.6	**63.6**
Current tax assets	-	-	-	-	-	-	-	11.4	**11.4**
Deferred tax assets	-	-	-	-	-	-	-	7.3	**7.3**
Other assets	169.7	7.3	0.1	-	-	0.1	0.6	4,819.3	**4,997.1**
Investment in group companies	-	-	-	-	-	-	-	29.5	**29.5**
Total assets	**5,151.7**	**2,129.8**	**2,237.2**	**1,035.1**	**3,017.9**	**3,928.7**	**775.2**	**4,934.9**	**23,210.5**
Liabilities									
Financial liabilities held for trading	2.2	537.1	329.4	161.4	43.8	495.7	65.1	-	**1,634.7**
Non-trading financial liabilities at fair value through profit or loss	4.8	294.6	73.6	298.2	2,359.5	713.3	-	-	**3,744.0**
Derivative financial liabilities	34.3	736.3	802.6	504.8	533.2	882.1	289.0	-	**3,782.3**
Due to banks and other financial institutions	1,527.6	1,555.3	374.2	119.1	437.7	2,536.1	3.2	-	**6,553.2**
Repurchase agreements	72.0	439.9	156.7	14.4	14.4	155.7	-	-	**853.1**
Due to customers	490.0	100.7	486.4	-	-	-	-	-	**1,077.1**
Current tax liabilities	-	-	-	-	-	-	-	2.3	**2.3**
Subordinated debt	-	-	-	-	-	-	247.6	-	**247.6**
Other liabilities	3,388.1	2.8	-	0.3	-	8.5	1.1	74.1	**3,474.9**
Total liabilities	**5,519.0**	**3,666.7**	**2,222.9**	**1,098.2**	**3,388.6**	**4,791.4**	**606.0**	**76.4**	**21,369.2**

Undated other assets include commodities held at fair value. Other liabilities payable on demand include obligations to return commodity balances placed with the Group.

36. Maturity analysis (continued)

Group - 31 December 2022	Repayable on demand	Maturing within 1 month	Maturing after 1 month but within 3 months	Maturing after 3 months but within 6 months	Maturing after 6 months but within 12 months	Maturing after 12 months but within 5 years	Maturing after 5 years	Undated	Total
	$m	$m	$m	$m	$m	$m	$m	$m	$m
Assets									
Cash and balances with central banks	4,856.1	-	-	-	-	-	-	-	4,856.1
Due from banks and other financial institutions	1,441.3	60.0	15.1	63.5	114.1	488.3	-	-	2,182.3
Financial assets held for trading	11.1	38.3	44.6	62.9	61.7	220.5	263.6	-	702.7
Non-trading financial assets at fair value through profit or loss	-	107.4	78.1	-	1,988.2	15.7	-	4.3	2,193.7
Derivative financial assets	50.0	997.4	1,136.5	638.5	752.1	1,041.5	352.0	-	4,968.0
Reverse repurchase agreements	256.0	644.5	1,286.3	88.7	192.7	146.4	-	-	2,614.6
Loans and advances to customers	259.2	-	-	-	42.6	372.0	144.8	-	818.6
Financial investments	5.2	-	85.2	199.5	374.4	582.5	46.6	-	1,293.4
Property and equipment	-	-	-	-	-	-	-	34.6	34.6
Current tax assets	-	-	-	-	-	-	-	5.5	5.5
Deferred tax assets	-	-	-	-	-	-	-	0.6	0.6
Other assets	141.0	4.2	0.2	-	-	-	0.6	2,811.2	2,957.2
Total assets	7,019.9	1,851.8	2,646.0	1,053.1	3,525.8	2,866.9	807.6	2,856.2	22,627.3
Liabilities									
Financial liabilities held for trading	2.2	60.7	280.1	286.5	260.5	315.9	89.3	-	1,295.2
Non-trading financial liabilities at fair value through profit or loss	-	-	-	-	2,061.3	889.9	-	-	2,951.2
Derivative financial liabilities	21.4	1,004.5	1,079.5	831.0	849.3	1,017.0	550.1	-	5,352.8
Due to banks and other financial institutions	1,743.7	988.8	234.0	56.4	79.5	3,115.9	3.6	-	6,221.9
Repurchase agreements	-	188.5	278.8	-	-	62.8	-	-	530.1
Due to customers	1,359.5	344.9	10.1	22.0	-	-	-	-	1,736.5
Current tax liabilities	-	-	-	-	-	-	-	3.5	3.5
Subordinated debt	-	-	-	-	-	-	245.4	-	245.4
Other liabilities	2,543.9	2.5	-	-	-	0.2	1.6	60.5	2,608.7
Total liabilities	5,670.7	2,589.9	1,882.5	1,195.9	3,250.6	5,401.7	890.0	64.0	20,945.3

36. Maturity analysis (continued)

Company - 31 December 2022	Repayable on demand	Maturing within 1 month	Maturing after 1 month but within 3 months	Maturing after 3 months but within 6 months	Maturing after 6 months but within 12 months	Maturing after 12 months but within 5 years	Maturing after 5 years	Undated	Total
	$m	$m	$m	$m	$m	$m	$m	$m	$m
Assets									
Cash and balances with central banks	4,856.1	-	-	-	-	-	-	-	4,856.1
Due from banks and other financial institutions	1,380.1	60.0	15.1	63.5	114.1	488.3	-	-	2,121.1
Financial assets held for trading	11.1	38.3	44.6	62.9	61.7	220.5	263.6	-	702.7
Non-trading financial assets at fair value through profit or loss	-	107.4	78.1	-	1,988.2	15.7	-	4.3	2,193.7
Derivative financial assets	50.0	997.4	1,136.5	638.5	752.1	1,041.5	352.0	-	4,968.0
Reverse repurchase agreements	256.0	644.5	1,286.3	88.7	192.7	146.4	-	-	2,614.6
Loans and advances to customers	259.2	-	-	-	42.6	372.0	144.8	-	818.6
Financial investments	5.2	-	85.2	199.5	374.4	582.5	46.6	-	1,293.4
Property and equipment	-	-	-	-	-	-	-	28.5	28.5
Current tax assets	-	-	-	-	-	-	-	5.4	5.4
Deferred tax assets	-	-	-	-	-	-	-	-	-
Other assets	141.0	4.2	0.2	-	-	-	0.6	2,811.0	2,957.0
Investment in group companies	-	-	-	-	-	-	-	29.5	29.5
Total assets	6,958.7	1,851.8	2,646.0	1,053.1	3,525.8	2,866.9	807.6	2,878.7	22,588.6
Liabilities									
Financial liabilities held for trading	2.2	60.7	280.1	286.5	260.5	315.9	89.3	-	1,295.2
Non-trading financial liabilities at fair value through profit or loss	-	-	-	-	2,061.3	889.9	-	-	2,951.2
Derivative financial liabilities	21.4	1,004.5	1,079.5	831.0	849.3	1,017.0	550.1	-	5,352.8
Due to banks and other financial institutions	1,743.7	988.8	234.0	56.4	79.5	3,115.9	3.6	-	6,221.9
Repurchase agreements	-	188.5	278.8	-	-	62.8	-	-	530.1
Due to customers	1,359.5	344.9	10.1	22.0	-	-	-	-	1,736.5
Current tax liabilities	-	-	-	-	-	-	-	2.7	2.7
Subordinated debt	-	-	-	-	-	-	245.4	-	245.4
Other liabilities	2,536.1	2.5	-	-	-	0.2	1.6	58.4	2,598.8
Total liabilities	5,662.9	2,589.9	1,882.5	1,195.9	3,250.6	5,401.7	890.0	61.1	20,934.6

37 Risk management

37.1 Overview and executive summary

The effective management of risk within the stated risk appetite is fundamental to the banking activities of the Group. The Group seeks to achieve a measured balance between risk and reward in the businesses as described below. In this regard, the Group continues to build and enhance the risk management capabilities that assist in delivering growth plans in a controlled environment.

Risk management is at the core of the operating and management structures of the Group. Managing and controlling risks, and in particular avoiding undue concentrations of exposure, limiting potential losses from stress events, restricting significant positions in less quantifiable risk areas and constraining profit or loss volatility are essential elements of risk management and the control framework, which serve to protect the Group's reputation and business franchise.

37.2 Risk management framework

Governance structure
Overall responsibility for risk management within the Group rests with the Board of Directors (the Board). Day-to-day responsibility is delegated to the Executive Committee and other Board sub-committees.

Accountability for risk management resides at all levels across the organisation, as set out by the three lines of defence model. The first line includes business unit management where the assessment, evaluation and measurement of risk are integrated into day-to-day business activities. The second line is represented by the risk management and compliance functions, which are independent of line management within the business units. The third line consists of internal audit, which provides an independent assessment on the adequacy and effectiveness of the Group's overall system of internal control and risk governance structures.

Risk policies and procedures
Frameworks, policies, and procedures are in place to manage each major risk type. These set out minimum requirements for management of risk, and promote consistency of risk management methods.

Risk appetite
Risk appetite is an expression of the amount, type and tenor of risk the Group is willing to take in pursuit of its financial and strategic objectives.

The Board establishes the parameters for risk appetite by:

- providing strategic leadership and guidance;
- reviewing and approving annual budgets and forecasts, under normal and stressed conditions;
- regularly reviewing and monitoring performance in relation to risk through quarterly Board reports; and
- conducting forward-looking analysis of risk measures compared with risk appetite under both normal and stressed conditions.

The Chief Risk Officer (CRO) recommends the level of risk appetite for the Group to both the BRMC and the Board.

The Group's risk appetite is defined in relation to the following metrics: earnings at risk; economic capital; regulatory capital; liquidity; and unacceptable risk. These metrics are converted into limits and triggers appropriate to the relevant risk types.

37 Risk management (continued)

37.2 Risk management framework (continued)

Stress testing (unaudited)

The Group's stress testing framework supports the regular execution of stress tests at the business unit and legal entity levels. The overall stress testing programme, incorporating credit, market, liquidity and operational risk, is a key management tool facilitating a forward-looking perspective of risk in relation to business performance.

Stress testing supports a number of business processes across the Group, including:

- strategic planning and budgeting;
- capital and liquidity planning and management, including setting capital and liquidity buffers;
- communication with internal and external stakeholders; and
- assessment of the impact of changes in short-term macroeconomic factors on the Group's performance.

Stress tests are used to manage the Group's risk profile proactively, to plan and manage capital and liquidity, and as an input into the strategic business planning process. They are an integral component of the Group's internal capital adequacy assessment process (ICAAP), and are used to assess and manage the adequacy of regulatory and economic capital.

Management conducts stress testing on a daily basis to assess the impact on the Group's funding and liquidity position. Internal stress testing is used to model severe idiosyncratic, market-wide and combined stress scenarios and to determine the Group's liquidity risk appetite. The stress testing framework is included in the individual liquidity adequacy assessment process (ILAAP), which is used to assess the Group's processes for identification, measurement, management and monitoring of liquidity and funding risk.

The appropriateness and severity of the relevant stress scenarios for enterprise-wide stress testing are approved by the BRMC and reviewed at least annually. Management reviews the results of the stress tests and evaluates the need for mitigating actions, including modifications to risk limits, reducing levels of business, and limiting exposures through hedging activities.

During 2023, the Group performed stress tests based on internal group defined scenarios with the most severe scenario comparable to the Bank of England's Solvency Stress Test. The scenarios used by ICBCS were a "Financial Crisis" scenario and a scenario based closely on the Bank of England's "Annual Cyclical Scenario". The "Financial Crisis" scenario examines the impact of a financial crisis in advanced economies and China with an associated Emerging Market risk-off and negative commodity shock. The "Annual Cyclical Scenario" examines the effects of an intensification of upward inflation and interest rate trends, applied against an updated baseline.

The stress test scenarios will be updated in early 2024 in line with the normal annual process, with additional scenarios considered should there be material change in the global economic outlook.

The Group also conducts reverse stress testing to complement the stress testing programme described above. Reverse stress testing identifies those scenarios that could threaten the ongoing stability of the Group, and inform what action should be taken to mitigate this risk.

37 Risk management (continued)

Risk profile

The Group's trading activities comprise both own account and customer related business. These result in the Group holding positions in foreign exchange, commodities and marketable securities for its own account and to facilitate client business. The Group's non-trading portfolios include loans and advances, deposits and debt securities.

37.3 Risk categories

The principal risks to which the Group is exposed and which it manages are described in the table that follows. This is not an exhaustive list of all potential risks facing the Group, but rather those which management believes may have a significant impact on its business performance and future prospects.

	Risk Type	Mitigating Actions
Credit Risk	Credit risk is the risk of loss from failure of counterparties to meet their financial or contractual obligations when due. • Counterparty risk – loss arising from a counterparty being unwilling or unable to meet its financial or contractual obligations when due. This includes primary (lending) risk, pre-settlement (trading) risk and issuer risk in the Banking Book. • Credit concentration – loss arising from an excessive concentration of exposure, inter alia, to a single counterparty, counterparty segment, industry, country or geography. • Contingent risk is the risk that approved credit risk mitigation techniques applied prove to be less effective than expected. Exit (in relation to physical commodities), gap and credit insurance risk are components of contingent risk, although gap risk is largely a "hybrid" between market and credit risk. A counterparty could be exposed to climate-related risk either through physical or transition risks.	The Group manages credit risk by: • maintaining a culture of responsible risk taking and an established risk policy and control framework; • identifying, assessing and measuring credit risk clearly and accurately across the Group; • defining, implementing and re-evaluating risk appetite under actual and stress conditions; • monitoring credit risk relative to limits; • ensuring expert scrutiny and independent approval of credit risks and their mitigation; • the Credit Limit Appetite Guideline ('CLAG') which links the amounts of unsecured credit risk the Group is willing to accept against any single entity consistent with the Group's underlying risk appetite statement; • operating the Notional Inventory Limit Guideline Framework, which is a set of guideline limits providing an indication of the Group's notional risk appetite for commodity inventory financing with an obligor. The guidelines consider both the credit rating of the counterparty and risks associated with the location where the inventory will be held; and • developing key vulnerability stress tests for specific concentrations. Work will continue to enhance and expand the scope of these stress tests. For more information on Credit Risk, please refer to note 37.4.

37 Risk management (continued)

37.3 Risk categories (continued)

Risk Type		Mitigating Actions
Country Risk	Cross-border country risk is the uncertainty that obligors (including the relevant sovereign and obligations of the Group's branches and subsidiaries in a country) may not be able to fulfil their obligations to the Group because of political or economic conditions in the host country. The definition includes Group equity investments and physical inventories owned by the Group in a host country. Country risk may be fully or partially reduced or transferred to another country through a number of mitigants.	The Group manages country risk by: • maintaining a culture of responsible risk taking and an established risk policy and control framework; • identifying, assessing and measuring country risk clearly and accurately across the Group; • monitoring country risk relative to limits; • commercial risk insurance; • co-financing with multilateral institutions; and • structures to mitigate transferability and convertibility risk such as collection, collateral and margining deposits outside the jurisdiction in question. The Group has higher appetite for certain key jurisdictions such as China, South Africa, Nigeria and Turkey. Country limit requests are notified to ICBC Group to ensure ICBCS does not exceed ICBC Group appetite for a specific country. Country limits are approved for use through the ICBCS governance structure and exposures are managed to these limits. Regular stress tests are run to ensure exposures remain within risk appetite with results reviewed by senior management, including at Board level. For more information on Country Risk, please refer to note 37.5.
Market Risk	The risk of a change in market value, earnings (actual or effective) or future cash-flows of a portfolio of financial instruments (including commodities), caused by moves in market variables such as bond, commodity and equity prices, currency exchange rates, interest rates, credit spreads and recovery rates, and correlations and implied volatilities in all of these variables. Climate-related risks can manifest through market value loss due to societal, legal and technological response to climate change. Assets could be subject to a change in investor perception of profitability and a consequent revaluation. Physical risk channels can also result in market value loss due to weather impacts particularly affecting commodities and property.	The Group manages market risk by: • measuring the Group's market risk portfolios under both normal market conditions (Value at Risk ('VAR') at 99% confidence, one-day holding period) and stressed market conditions (VAR at 99% confidence, ten-day holding period); • the measurement of market risk is supplemented by the monitoring of material risk factor sensitivities such as Delta, Gamma, Vega and other risk metrics where appropriate; • taking actions to keep exposures within approved risk appetite limit tolerances. Where breaches in limits occur, they will be dealt in accordance with the breach management and escalation section of the market risk policy; and • applying risk controls to all portfolio and concentration limits i.e. stress testing, back testing, stop loss monitoring and front office supervisory controls associated with the trading mandates. For more information on Market Risk, please refer to note 37.7.
Operational Risk	The risk of loss suffered as a result of inadequacy of, or a failure in, internal processes, people, and systems or from external events. It incorporates losses arising from insurance risk and physical commodities. Operational risk sub-types include: • Business disruption and system failures, including cyber incidents • Damage to physical assets • Execution and process management • Internal and external fraud • Clients, products, and business practices • Employment practices and workplace safety • Access and security controls to key systems • Climate-related impact due to physical risks	The Group manages operational risk by: • adopting operational risk practices that assist business and IT line management in understanding their inherent risk and reducing their risk profile while seeking to maximise their operational performance and efficiency; • monitoring and challenging the management of the business and IT operational risk profile; and • analysing incident root causes, trends and emerging threats, advising on the remediation of potential control weaknesses and recommending best practice solutions. For more information on Operational Risk, please refer to note 37.8.

37 Risk management (continued)

37.3 Risk categories (continued)

	Risk Type	Mitigating Actions
Liquidity and Funding Risk	Liquidity risk is the risk that a firm, although solvent, does not have available sufficient financial resources to enable it to meet its obligations as they fall due. Funding risk is the risk that a firm does not have stable sources of funding in the medium and long term to enable it to meet its financial obligations as they fall due, either at all or only at excessive cost. Specific liquidity and funding risks include: • Reliance on shareholder funding • Depositor concentration • Dependency on management actions in stress	• The Group operates a liquidity stress testing framework based on regulatory and internal stress scenarios. The Group has a forecasting process, to assist with management of the funding profile and ensure compliance with the liquidity risk appetite statement limits. The Group also has a number of tailored early warning indicators that are monitored daily with escalation procedures. • To mitigate risks associated with reliance on shareholder funding, the majority of shareholder deposits are placed on a 370-day notice structure. • To mitigate external depositor concentration, deposit maturities are staggered to minimise the funding risk arising from single large maturities or single counterparties. The Group's stress tests contain prudent rollover assumptions. • Management actions available to the Group in the event of a liquidity stress are updated annually and their quantification is reported monthly to executive forums. • To ensure on-going NSFR compliance, desk level NSFR limits are monitored daily and feed into the early warning indicator framework. • A regulatory waiver is in place for precious metals, supporting clearing balances, which would otherwise require term funding within NSFR calculations. For more information on the Group's maturity profile as at 31 December 2023, refer to note 36, Maturity analysis and note 37.6, Liquidity Risk, structural requirements.
Business Risk	Business risk is the residual earnings variability after taking into account the effects of market risk, credit risk, structural interest rate risk, and operational risk. It covers the risk that the Group fails to meet its financial objectives as a result of factors such as: • Competition and margin reduction • Failed client/financing strategies • Unplanned increase in costs • Reduced co-operation with ICBC group • Changes in GBP/USD FX rates	The Group manages business risk by: • regular review of management information relating to business performance; • rigorous annual budget and business planning cycles; • co-operation with ICBC group on new revenue sharing opportunities and systems/infrastructure initiatives designed to create longer term value; • improving profitability through a strong focus on cost control while continuing to invest to grow the franchise; • managing regulatory change deliverables to strict budgets while not compromising on requirements; and • a short-term hedging programme with regard to the cost base.

37 Risk management (continued)

37.3 Risk categories (continued)

Risk Type		Mitigating Actions
Conduct Risk	The risk that intentional or unintentional business practices and behaviours will lead to poor outcomes for clients, counterparties or the markets operated in by the Group Conduct risk may arise from, for example, selling products which may not meet client needs, entering into finance arrangements that fund activities that do not align with the Group's values or from exhibiting behaviours that may distort the market or not meet regulatory standards.	The Group manages conduct risk through: • a conduct risk framework which sets the standard of behaviour expected of all staff; • monitoring conduct risk metrics and providing senior managers with metrics relevant for their function; • taking appropriate and proportionate action when an issue or incident arises and learning from these incidents through root cause analysis; and • reviewing all significant new products and transactions, assessing the intended outcome and end to end life cycle of the product/transaction. During 2023 conduct risk has remained a key focus for the Group, learning from both internal and external industry developments and events. The organisation has been proactive in developing its approach and governance to effectively manage volatile and challenging market events.
Financial Crime Risk	Financial crime risk consists of: • The risk that criminal parties will abuse the products and services of the Group; • The risk that the Group transacts or facilitates business involving sanctioned or restricted parties or products; • The risk that regulators/law enforcement authorities will apply civil and/or criminal sanctions and penalties for failure to comply with anti-money laundering, counter terrorist financing, anti-bribery and corruption, tax evasion, fraud, modern slavery and sanctions laws, regulations, codes of conduct and regulatory/industry standards of good practice; and • The risk that through the markets and/or media outlets, the Group's reputation is harmed by unfavourable media or market word-of-mouth, due to financial crime risk events, allegations, or the actions of regulators/law enforcement authorities.	The Group has an established financial crime risk management framework. This consists of a suite of systems and controls as follows: • Board mandated financial crime risk appetite statement; • application of a three lines of defence model; • ongoing screening of all counterparties and payments for sanctions-related and other financial crime risks; • robust client onboarding and periodic review standards and processes; • enhanced due diligence measures to assess sanctions and other financial crime touchpoints in transactions and across the Group's counterparty population; • periodic risk assessments, monitoring and assurance reviews; • monitoring regulatory, enforcement and geopolitical developments; • suspicious activity monitoring and reporting; and • staff training and breaches reporting and management.
Reputational Risk	The potential or actual damage to the Group's image which may impair the profitability and/or sustainability of its business. Such damage may result from a breakdown of trust, confidence, or business relationships with stakeholders that can adversely affect the Group's ability to manage business relationships, and continue having access to funding.	The Group has an established governance framework to assess the potential reputational risk that may be introduced to the Group through the use of a product, transacting with a client or executing a specific transaction. If reputational risk is deemed to be outside of the Group's tolerance level, action will be taken to mitigate the impact to the Group including: • terminating a client relationship; or • declining participation in a transaction. The Group continued to manage reputational risk through its established governance model during 2023. For more information on Reputational Risk, refer to note 37.9.

37 Risk management (continued)

37.3 Risk categories (continued)

Risk Type		Mitigating Actions
Regulatory and Legal Risk	The risk that the Group may suffer legal or regulatory sanctions, material financial loss or adverse impact on its reputation as a result of a failure to fully comply with laws, regulations, rules, standards or codes of conduct applicable to its financial services activities.	The Group seeks to manage these risks by: • working closely with UK and local regulators in all relevant jurisdictions; • developing compliance and financial crime risk assessments to assess areas of weakness in the Group's business model; • conducting horizon scanning and impact analysis on regulatory change initiatives; • responding to new and ongoing regulatory prudential and conduct requirements; • continued investment in training, systems and processes; and • having an established governance and control framework with responsibility for the approval of new products and transactions. The Group has successfully implemented its transition plans for US Dollar Libor products to alternative risk-free-rates. Further details are included in note 7.5. Legal proceedings currently being pursued against the Group are summarised in note 29.3.
Environmental Risk	Environmental risk consists of both environment-related and climate-related risks. Environmental risk refers to risks posed by the exposure of the Group or financial sector to activities that may cause or be affected by environmental degradation. Environmental risk is considered to be a cross-cutting risk as it can arise through, or impact on, other risk types such as credit, market and operational risk. Climate-related risk refers to risks posed by the exposure of the Group or financial sector to physical and transition risks caused by or related to climate change.	The Group has continued to embed environmental and climate risk management within the enterprise risk framework. Whilst certain areas require further enhancement, the Group seeks to manage environmental risk by: • Considering environmental risk as part of the credit rating and analysis process; • Undertaking stress testing within market risk and counterparty credit risk for climate-related scenarios; • Enhancing risk processes with environmental risk considerations including the Risk Control Self-Assessment (RCSA), New Products and client on-boarding processes; • Implementing physical hazard modelling into the Physical Commodities Risk Assurance processes including location and operator on-boarding; and • Developing capabilities to conduct climate-related scenario analysis across a range of scenarios, temperature pathways and time horizons.
People Risk	The risk that the Group fails to maintain organisational skills, capability, resilience and capacity levels in response to internal and/or external change, adversely affecting the Group's operations and its ability to deliver on its strategic aims.	The Group manages people risk by: • focused initiatives to attract and retain talent; • investing in training and development; • reinforcing behaviours that drive the best outcomes for clients and employees; • maintaining appropriate succession plans for key staff; and • effective remuneration structures to support performance-based reward.

37 Risk management (continued)

37.4 Credit risk

Credit risk principally comprises counterparty credit risk arising from loans granted, commodity leasing, securities financing transactions and derivative contracts entered into with clients and market counterparties.

The Group manages credit risk through:

- maintaining a strong culture of responsible risk taking and a robust risk policy and control framework;
- identifying, assessing and measuring credit risk clearly and accurately across the Group, from the level of individual facilities up to the total portfolio;
- defining, implementing and re-evaluating risk appetite under actual and stress conditions;
- monitoring exposures relative to limits; and
- ensuring that there is expert scrutiny and independent approval of exposures and their mitigation.

The Group's exposure to counterparty credit risk is affected by the nature of the trades and recognition of any eligible netting and collateral arrangements.

Structure and organisation of credit risk management function
The head of credit has functional responsibility for credit risk across the Group and reports to the CRO.

A formal structure exists for the approval of credit limits, which are agreed through delegated authority derived from the Board. The Board awards the highest level of delegated authority to the credit committee to exercise responsibility for granting credit risk. The credit committee is convened as a sub-committee of the RMC with a mandate to:

- Exercise responsibility for the independent assessment, approval, review, and monitoring of credit and country risk limits and exposures relating to the Group's business under a delegated authority construct;
- Ensure that the origination and management of credit and country risk exposures in the portfolio are in line with the credit risk policy and any other guidance given to it by the RMC from time to time;
- Escalate matters to RMC as appropriate, including breaches of risk appetite and proposed corrective actions;
- Monitor and review non-performing loan and watchlist exposures;
- Review and approve counterparty trading documentation (e.g. ISDA Master Agreements, Global Master Repurchase Agreements, etc.) and legal opinions on netting, collateral and other forms of credit risk mitigation; and
- Approve any underwriting commitments related to primary markets transactions.

37 Risk management (continued)

37.4 Credit risk (continued)

Methodology to assign credit limits

The Group uses internal models and practices to measure and manage credit risk to ensure that it is properly understood, managed and controlled.

The credit modelling framework includes the use of probability of default (PD), loss given default (LGD), exposure at default (EAD), unexpected loss, expected loss, economic capital (Ecap) consumption and economic profit. The Group's risk appetite is, in part, calibrated to these economic risk drivers.

PD models are used to assess the probability of a counterparty not making full and timely repayment of credit obligations over a specific time horizon. The models use a combination of forward-looking qualitative factors and quantitative inputs. Each customer is assigned an internal credit rating, which in turn is mapped to a statistically calibrated PD. Different models are used for each discrete credit portfolio and counterparty, and each model has its own particular set of risk factors and inputs used for assessing the rating. All models are statistically tested and independently validated to ensure they have an acceptable level of predictive power, provide an accurate forward-looking rating assessment suitable for use in regulatory and Ecap assessment, and are stable through an economic cycle. For Ecap management, the Group uses forward-looking ratings but also explores point-in-time (PIT) versus through-the-cycle (TTC) impacts through stress testing and deploys a stressed credit migration to assess the impact of risk rating downgrades.

The Group's 25-point master rating scale below is indicatively mapped against external rating agencies' alphanumerical rating scales and group grading categories.

Group master rating scale	Moody's Investor Services	Standard and Poor's	Fitch Ratings	Grading
1 - 4	Aaa to Aa3	AAA to AA-	AAA to AA-	Investment grade
5 - 7	A1 to A3	A+ to A-	A+ to A-	
8 - 12	Baa1 to Baa3	BBB+ to BBB-	BBB+ to BBB-	
13 - 25	Ba1 to Ca	BB+ to CCC-	BB+ to CCC-	Sub-investment grade
Default	C	D	D	Default

Exposure to credit risk

The following table sets out information about the credit quality of financial assets measured at amortised cost and FVOCI debt investments without taking into account collateral or other credit enhancements. The amounts in the table represent gross carrying amounts.

37 Risk management (continued)

37.4 Credit risk (continued)

Credit quality analysis of gross loans and advances (notes 4, 8 and 9) and debt securities held at FVOCI and amortised cost (note 10)

	Amortised Cost[1]		Fair value through other comprehensive income	
	2023	2022	**2023**	2022
	$m	$m	**$m**	$m
Grades 1-21: Pass	**5,376.1**	4,080.3	**631.7**	1,293.4
Stage 1	**5,376.1**	4,080.3	**631.7**	1,293.4
Stage 2	**-**	-	**-**	-
Stage 3	**-**	-	**-**	-
Grades 22-25: Special Mention	**65.9**	49.2	**-**	-
Stage 1	**65.9**	39.4	**-**	-
Stage 2	**-**	9.8	**-**	-
Stage 3	**-**	-	**-**	-
Grade D1: Sub-standard	**-**	78.0	**-**	-
Stage 1	**-**	-	**-**	-
Stage 2	**-**	-	**-**	-
Stage 3	**-**	-	**-**	-
POCI	**-**	78.0	**-**	-
Grade D2: Doubtful	**10.8**	45.4	**-**	-
Stage 1	**-**	-	**-**	-
Stage 2	**-**	-	**-**	-
Stage 3	**-**	28.3	**-**	-
POCI	**10.8**	17.1	**-**	-
Grade D3: Loss	**-**	-	**-**	-
Stage 1	**-**	-	**-**	-
Stage 2	**-**	-	**-**	-
Stage 3	**-**	-	**-**	-
POCI	**-**	-	**-**	-
	5,452.8	4,252.9	**631.7**	1,293.4

[1] Amortised cost balances include POCI exposures reported in other assets on the balance sheet.

There is one counterparty that has a credit rating of D1: Sub-standard, D2: Doubtful, or D3: Loss, in 2023 (2022: four counterparties).

For the tables that follow, the definitions below have been used for the different categories of exposures:

- **Neither past due nor impaired** represents exposures that are current and fully compliant with all contractual terms and conditions.
- **Past due but not specifically impaired** includes those exposures where the counterparty has failed to make its contractual payment or has breached a material covenant, but impairment losses have not yet been incurred due to the expected recoverability of future cash flows, including collateral. Ultimate loss is not expected but could occur if the adverse condition persists. These exposures are analysed further between those that are less than 90 days past due and those that are 90 days or more past due.
- **Specifically impaired** exposures include those where there is objective evidence that an impairment loss has been incurred and for which there has been a measurable decrease in the estimated future cash flows as a result of the borrower's payment status or objective evidence of impairment.

37 Risk management (continued)

37.4 Credit risk (continued)

Specifically impaired exposures are further analysed into the following categories:

- **sub-standard items** that show underlying well-defined weaknesses and are considered to be specifically impaired;
- **doubtful items** that are not yet considered final losses because of some pending factors that may strengthen the quality of the items; and
- **loss items** that are considered to be uncollectible in whole or in part. The Group provides fully for its anticipated loss, after taking any security into account.

- **Non-performing exposures** are those exposures for which the Group has identified objective evidence of default, such as breach of a material covenant or condition, or instalments are due and unpaid for 90-days or more.

Maximum exposure to credit risk

	Performing (Group master ratings: 1-25)		Non-performing (Group master rating: Default)		
	Neither past due nor impaired	Past due but not specifically impaired		Specifically impaired	Gross credit exposure
2023	$m	$m	$m	$m	$m
Cash and balances with central banks[1]	**2,635.9**	-	-	-	**2,635.9**
Gross due from banks and other financial institutions	**2,252.5**	-	-	-	**2,252.5**
Financial assets held for trading	**1,278.5**	-	-	-	**1,278.5**
Non-trading financial assets at fair value through profit or loss	**2,852.8**	-	-	-	**2,852.8**
Derivative financial assets	**3,373.1**	-	**10.1**	-	**3,383.2**
Gross reverse repurchase agreements	**2,936.2**	-	-	-	**2,936.2**
Gross loans and advances to customers	**774.9**	-	-	-	**774.9**
Gross financial investments	**2,052.8**	-	-	-	**2,052.8**
Gross POCI exposures	-	-	-	**10.8**	**10.8**
Total balance sheet exposure to credit risk	**18,156.7**	-	**10.1**	**10.8**	**18,177.6**
Guarantees					**102.9**
Irrevocable unutilised facilities					**511.2**
Commodity leases					**1,735.5**
Total off-balance sheet exposure to credit risk					**2,349.6**
Total exposure to credit risk					**20,527.2**
Reconciliation to the balance sheet					
Add: Equity instruments (disclosed in note 6)					**3.8**
Add: Non-financial assets					**5,077.2**
Less: Credit loss allowance					**(11.5)**
Less: Off-balance sheet exposure					**(2,349.6)**
Total assets					**23,247.1**

37 Risk management (continued)

37.4 Credit risk (continued)

Maximum exposure to credit risk (continued)

	Performing (Group master ratings: 1-25)			Non-performing (Group master rating: Default)	
	Neither past due nor impaired	Past due but not specifically impaired		Specifically impaired	Gross credit exposure
2022	$m	$m	$m	$m	$m
Cash and balances with central banks[1]	4,856.1	-	-	-	4,856.1
Gross due from banks and other financial institutions	2,163.0	-	-	28.3	2,191.3
Financial assets held for trading	702.7	-	-	-	702.7
Non-trading financial assets at fair value through profit or loss	2,189.5	-	-	-	2,189.5
Derivative financial assets	4,967.8	-	-	0.2	4,968.0
Gross reverse repurchase agreements	2,614.8	-	-	-	2,614.8
Gross loans and advances to customers	822.6	-	-	-	822.6
Gross financial investments	1,293.4	-	-	-	1,293.4
Gross POCI exposures	-	-	-	95.1	95.1
Total balance sheet exposure to credit risk	19,609.9	-	-	123.6	19,733.5
Guarantees					112.4
Irrevocable unutilised facilities					235.9
Commodity leases					765.6
Total off-balance sheet exposure to credit risk					1,113.9
Total exposure to credit risk					20,847.4
Reconciliation to the balance sheet					
Add: Equity instruments (disclosed in note 6)					4.2
Add: Non-financial assets					2,954.3
Less: Credit loss allowance					(64.7)
Less: Off-balance sheet exposure					(1,113.9)
Total assets					22,627.3

[1] Reserve account with the Bank of England (see note 3)

Analysis of gross balances subject to three stage expected credit loss (ECL) model

	Stage 1	**Stage 2**	**Stage 3**			**POCI**	
			Sub-standard	**Doubtful**	**Loss**		**Total**
2023	**$m**	**$m**	**$m**	**$m**	**$m**	**$m**	**$m**
Cash and balances with central banks	**2,635.9**	**-**	**-**	**-**	**-**	**-**	**2,635.9**
Due from banks and other financial institutions	**2,252.5**	**-**	**-**	**-**	**-**	**-**	**2,252.5**
Reverse repurchase agreements	**1,102.3**	**-**	**-**	**-**	**-**	**-**	**1,102.3**
Loans and advances to customers	**774.9**	**-**	**-**	**-**	**-**	**-**	**774.9**
Financial investments	**1,943.9**	**-**	**-**	**-**	**-**	**-**	**1,943.9**
Commitments and financial guarantees given	**614.1**	**-**	**-**	**-**	**-**	**-**	**614.1**
Other assets	**-**	**-**	**-**	**-**	**-**	**10.8**	**10.8**
Total	**9,323.6**	**-**	**-**	**-**	**-**	**10.8**	**9,334.4**

	Stage 1	Stage 2	Stage 3			POCI	
			Sub-standard	Doubtful	Loss		Total
2022	$m	$m	$m	$m	$m	$m	$m
Cash and balances with central banks	4,856.1	-	-	-	-	-	4,856.1
Due from banks and other financial institutions	2,153.2	9.8	-	28.3	-	-	2,191.3
Reverse repurchase agreements	1,143.9	-	-	-	-	-	1,143.9
Loans and advances to customers	822.6	-	-	-	-	-	822.6
Financial investments	1,293.4	-	-	-	-	-	1,293.4
Commitments and financial guarantees given	348.3	-	-	-	-	-	348.3
Other assets	-	-	-	-	-	95.1	95.1
Total	10,617.5	9.8	-	28.3	-	95.1	10,750.7

37 Risk management (continued)

37.4 Credit risk (continued)

Movements in credit loss allowances

	Stage 1 12-month ECL	Stage 2 Lifetime ECL - not credit-impaired	Stage 3 Lifetime ECL - credit-impaired	POCI Lifetime ECL - credit-impaired	Total
	$m	$m	$m	$m	$m
Credit loss allowance at 1 January 2023	(7.3)	(3.8)	(4.1)	(51.4)	**(66.6)**
Transfer:					
to stage 1	-	-	-	-	**-**
to stage 2	-	-	-	-	**-**
to stage 3	-	-	-	-	**-**
Increases due to origination and acquisition	(6.3)	-	-	-	**(6.3)**
Changes due to change in credit risk	(1.3)	-	-	3.3	**2.0**
Financial assets derecognised during the period	1.7	3.8	4.1	44.9	**54.5**
Write-offs of allowances against exposures	-	-	-	-	**-**
Other adjustments	-	-	-	(0.4)	**(0.4)**
Credit loss allowance at 31 December 2023	(13.2)	(0.0	(0.0)	(3.6)	**(16.8)**

	Stage 1 12-month ECL	Stage 2 Lifetime ECL - not credit-impaired	Stage 3 Lifetime ECL - credit-impaired	POCI Lifetime ECL - credit-impaired	Total
	$m	$m	$m	$m	$m
Credit loss allowance at 1 January 2022	(5.0)	(0.3)	-	-	(5.3)
Transfer:				-	
to stage 1	-	-	-	-	-
to stage 2	-	0.3	-	-	0.3
to stage 3	-	-	(0.3)	-	(0.3)
Increases due to origination and acquisition	(5.1)	(3.8)	-	-	(8.9)
Changes due to change in credit risk	-	-	(3.8)	-	(3.8)
Financial assets derecognised during the period	2.8	-	-	-	2.8
Write-offs of allowances against exposures	-	-	-	-	-
Other adjustments	-	-	-	(51.4)	(51.4)
Credit loss allowance at 31 December 2022	(7.3)	(3.8)	(4.1)	(51.4)	(66.6)

Renegotiated loans and advances

Renegotiated loans and advances are loans which have been refinanced, rescheduled, rolled over or otherwise modified during the year because of weaknesses in the counterparty's financial position and where it has been judged that normal repayment is expected to continue after the restructure. Renegotiated loans and advances are assessed on an individual basis and monitored during the rehabilitation period before being transferred into the performing portfolio. Following rehabilitation, internally generated risk grades are assigned that reflect the revised risk of the exposure. Consequent impairment recognition is evaluated as part of the normal credit process. There were no renegotiated loans that would otherwise be past due or impaired as at 31 December 2023 (2022: US$nil).

37 Risk management (continued)

37.4 Credit risk (continued)

The primary aim of providing forbearance facilities to customers is to enable the complete recovery of the exposure through the full repayment of arrears. The Group does not follow a general forbearance policy but each facility is treated on its own merits. There were no forborne loans at 31 December 2023 (2022: US$28.3 million).

Watchlist review is an early warning mechanism which identifies any deterioration in counterparty performance. These exposures are immediately subject to independent scrutiny and, where necessary, a programme of intensive monitoring and review until such time as the position can be transferred back to line management. In cases where the remedial strategy does not produce the expected corrective action, the Group may consider an alternative remedial strategy or referral to the Business Support and Recovery ("BS&R") team, the workout unit which sits in the Risk function, for active recovery management. An impairment charge is raised if any new terms are less favourable and result in the discounted cash flows being lower than the carrying value of the exposures.

At 31 December 2023, there were no performing loan exposures under watchlist review for which a significant increase in credit risk had been recognised. In 2022, a performing loan exposure of US$9.8 million relating to a single counterparty was under watchlist review and a significant increase in credit risk was recognised triggering a transfer from 12-month ECL (ECL stage 1) to lifetime ECL (ECL stage 2). This loan was repaid in full in 2023. A second loan exposure of US$28.3 million, which was classified as non-performing and transferred to ECL stage 3 during 2022 was also repaid in full during 2023.

The ECL allowance on the watchlist portfolio is dependent on the internal credit grade allocated to it. Additional management adjustments to the model capture the enhanced risks attached to this portfolio.

Credit risk mitigation and hedging
Collateral, guarantees, credit derivatives and netting are widely used by the Group for credit risk mitigation. The amount and type of credit risk mitigation depends on the circumstances of each case.

The amount and type of collateral required depends on the nature of the underlying collateral risk as well as an assessment of the credit risk of the counterparty. Regulatory capital requirements may also be considered in this assessment.

Derivative netting
For derivative transactions, the Group typically uses internationally recognised and enforceable International Swaps and Derivatives Association (ISDA) agreements, with a credit support annexure (CSA), where collateral support is considered necessary. Other credit protection terms may be stipulated, such as limitations on the amount of unsecured credit exposure acceptable, collateralisation if mark-to-market credit exposure exceeds acceptable limits and termination of the contract if certain credit events occur, for example, a downgrade of the counterparty's external credit rating.

Master netting agreements
Where appropriate, the Group seeks to enter into master netting agreements. Although master netting agreements do not generally result in an offset of balance sheet assets and liabilities for accounting purposes, as transactions are usually settled on a gross basis in the ordinary course of business, they do reduce the credit risk exposure and capital requirements to the extent that, if an event of default occurs, all amounts with the counterparty can be terminated and settled on a net basis. The Group's overall exposure to credit risk on derivative instruments subject to master netting agreements can change substantially within a short period, since this is the net position of all trades under the master netting agreement.

37 Risk management (continued)

37.4 Credit risk (continued)

Guarantees/standby letters of credit

Guarantees and standby letters of credit (SBLC) are contracts whereby a third-party guarantor promises to recompense the lender in the event of failure by a customer to meet their obligations. Regulatory capital relief is only taken through the use of risk weighted substitution for guarantees and SBLCs provided by appropriate central governments, central banks, commercial banks or similar institutions. Where regulatory capital relief is sought to reflect the risk mitigating effect of a guarantee, minimum legal and operational requirements are required to be met. On the basis that these requirements are met, alternative forms of protection, for example indemnities or non-payment insurance, may be classified as guarantees for regulatory capital purposes.

Credit derivatives

Credit derivatives are a method of transferring credit risk from one party (the protection buyer) to another (the protection seller). In return for a risk premium, the protection seller agrees to make a payment (or series of payments) to the protection buyer in the event of the occurrence of a stipulated event. Capital relief under regulatory requirements is restricted to the following types of credit derivative:

- credit default swaps;
- total return swaps; and
- credit-linked notes (to the extent of their cash funding).

In respect of a credit default swap, various credit events defined in the ISDA documentation affecting the obligor (including bankruptcy, failure to pay and restructuring), can trigger settlement. Settlement usually takes place by the protection buyer being paid by the protection seller the notional amount minus the recovery as determined by an auction of the eligible securities of the obligor governed by ISDA.

Under a total return swap, the protection buyer will pass on to the seller all payments it receives on the underlying credit obligation, plus any decrease in the market value of the credit obligation, in return for an interest related payment (market rate and spread).

Under a credit-linked note, the protection buyer issues a bond or note which is linked to the creditworthiness of an obligor and which may be backed by certain collateral. The bond or note is purchased by the protection seller, who receives a coupon on the bond or note (market rate and spread). If a credit event occurs in relation to either the obligor or the collateral, the bond or note is redeemed by the protection buyer with the recovery value of the collateral being the redemption amount. If no credit event occurs, the bond or note will be redeemed at par by the protection buyer.

Collateral required in respect of a rating downgrade

The Group enters into derivative contracts with rated and unrated counterparties. To mitigate counterparty credit risk, the Group stipulates credit protection terms such as limitations on the amount of unsecured credit exposure it will accept, collateralisation requirements if mark-to-market credit exposure exceeds those amounts and the collateralisation and termination requirements of the contract if certain credit events occur, which may include but not be limited to a downgrade of the counterparty's public credit rating.

Financial effect of collateral and other credit enhancements

The table below indicates the estimated financial effect that collateral has on the Group’s maximum exposure to credit risk. The collateral disclosed relates to the gross credit exposure reported under IFRS and does not represent the collateral qualifying for prudential reporting purposes. The table displays the on-balance sheet and off-balance sheet credit exposures for the Group, further divided between netting arrangements, and unsecured and secured exposures, with an additional breakdown of collateral coverage for the secured portion.

37 Risk management (continued)

37.4 Credit risk (continued)

Netting arrangements represent amounts which are legally enforceable upon default, totalling US$4,169.4 million at 31 December 2023 (2022: US$5,065.3 million). This is in addition to balances meeting the offsetting principles described in accounting policy 5.

Unsecured exposures of US$10,025.6 million (2022: US$9,718.8 million) largely represent corporate, government and designated multilateral development bank bonds, precious metal leases, irrevocable unutilised loan commitments, cash collateral placed with recognised exchanges and short-term placements with highly rated banks and non-banking financial institutions.

A significant portion of the secured exposures relate to reverse repo type securitised lending, where the collateral is typically tradeable. For loans and advances, the collateral accepted includes, cash, equities, guarantees and credit enhancements such as credit default swaps and credit insurance. However, guarantees received based on future revenue streams, assets whose value is highly correlated to the counterparty and floating charges over assets have been excluded from the table. Total exposures of US$3,544.2 million (2022: US$2,751.7 million) are more than 100% covered by collateral, primarily relating to reverse repurchase lending and equity margin loan activity.

Collateral obtained by the Group

It is the Group's policy to dispose of repossessed assets in an orderly manner. The proceeds are used to reduce or repay the outstanding claim. Generally, the Group does not use repossessed assets for business purposes. No collateral has been repossessed in 2023 or 2022.

37 Risk management (continued)

37.4 Credit risk (continued)

Financial effect of collateral and other credit enhancements[5]

	Total exposure to credit risk	Netting arrangements[1]	Exposure after netting	Unsecured exposures	Secured exposures	Extent of collateral and risk mitigation:		
						1 - 50%[2]	51 - 100%[3]	> 100%[4]
	$m	$m	$m	$m	$m	$m	$m	$m
2023								
Cash and balances with central banks	2,635.9	-	2,635.9	2,635.9	-	-	-	-
Due from banks and other financial institutions	2,252.5	827.1	1,425.4	889.4	536.0	-	131.3	404.7
Financial assets held for trading	1,278.5	-	1,278.5	1,278.5	-	-	-	-
Non-trading financial assets at fair value through profit or loss	2,852.8	-	2,852.8	858.8	1,994.0	-	1,994.0	-
Derivative financial assets	3,383.2	2,399.3	983.9	539.2	444.7	26.4	111.2	307.1
Reverse repurchase agreements	2,936.2	-	2,936.2	-	2,936.2	-	384.5	2,551.7
Loans and advances to customers	774.9	-	774.9	353.6	421.3	50.0	90.6	280.7
Financial investments	2,052.8	-	2,052.8	2,052.8	-	-	-	-
POCI exposures	10.8	-	10.8	10.8	-	-	-	-
Total balance sheet exposure to credit risk	**18,177.6**	**3,226.4**	**14,951.2**	**8,619.0**	**6,332.2**	**76.4**	**2,711.6**	**3,544.2**
Guarantees	102.9	-	102.9	102.9	-	-	-	-
Irrevocable unutilised facilities	511.2	-	511.2	511.2	-	-	-	-
Commodity leases	1,735.5	943.0	792.5	792.5	-	-	-	-
Total off-balance sheet exposure to credit risk	**2,349.6**	**943.0**	**1,406.6**	**1,406.6**	**-**	**-**	**-**	**-**
Total exposure to credit risk	**20,527.2**	**4,169.4**	**16,357.8**	**10,025.6**	**6,332.2**	**76.4**	**2,711.6**	**3,544.2**

	Total exposure	Netting arrangements[1]	Exposure after netting	Unsecured exposures	Secured exposures	Extent of collateral and risk mitigation:		
						1 - 50%[2]	51 - 100%[3]	> 100%[4]
	$m	$m	$m	$m	$m	$m	$m	$m
2022								
Cash and balances with central banks	4,856.1	-	4,856.1	4,856.1	-	-	-	-
Due from banks and other financial institutions	2,191.3	751.7	1,439.6	1,094.6	345.0	-	64.5	280.5
Financial assets held for trading	702.7	-	702.7	641.9	60.8	-	5.9	55.0
Non-trading financial assets at fair value through profit or loss	2,189.5	-	2,189.5	201.3	1,988.2	-	1,988.2	-
Derivative financial assets	4,968.0	3,892.2	1,075.8	314.8	761.0	85.5	264.4	411.1
Reverse repurchase agreements	2,614.8	-	2,614.8	-	2,614.8	-	903.2	1,711.6
Loans and advances to customers	822.6	-	822.6	529.1	293.5	-	-	293.5
Financial investments	1,293.4	-	1,293.4	1,293.4	-	-	-	-
POCI exposures	95.1	-	95.1	95.1	-	-	-	-
Total balance sheet exposure to credit risk	19,733.5	4,643.9	15,089.6	9,026.3	6,063.3	85.5	3,226.2	2,751.7
Guarantees	112.4	-	112.4	112.4	-	-	-	-
Irrevocable unutilised facilities	235.9	-	235.9	235.9	-	-	-	-
Commodity leases	765.6	421.4	344.2	344.2	-	-	-	-
Total off-balance sheet exposure to credit risk	1,113.9	421.4	692.5	692.5	-	-	-	-
Total exposure to credit risk	20,847.4	5,065.3	15,782.1	9,718.8	6,063.3	85.5	3,226.2	2,751.7

1 Represents netting arrangements that can be applied in the event of default. This is in addition to offsetting applied in the balance sheet, as permitted by IAS 32.
2 Represent exposures secured between 1% and 50%.
3 Represent exposures secured between 51% and 100%.
4 Represent exposures secured in excess of 100%.
5 Collateral valuations are performed based on the nature and price volatility of the underlying collateral.

37 Risk management (continued)

37.4 Credit risk (continued)

Wrong-way risk exposure

Wrong-way risk (WWR) is defined as the risk that arises due to adverse correlation between counterparty credit exposure and credit quality. WWR is present where the risk of default by the counterparty increases as the Group's credit exposure to the counterparty increases or as the value of the collateral held by the Group decreases. This risk is addressed by taking into consideration the high correlation between the default event and exposure to the counterparty when calculating the potential exposure and security margin requirements on these transactions.

37.5 Country risk

All countries to which the Group is exposed are reviewed at least annually. Internal rating models are employed to determine ratings for jurisdiction (on a jurisdiction rating scale aaa to c), sovereign, and transfer and convertibility risk (on a rating scale RG01 to RG25). In determining the ratings, use is made of the Group's network of operations and external information sources. These internal ratings are a key input into the Group's credit rating models.

Country risk is mitigated through a number of methods, including:

- commercial risk insurance;
- co-financing with multilateral institutions; and
- structures to mitigate transferability and convertibility risk such as collection, collateral and margining deposits outside the jurisdiction in question.

The following table illustrates customer risk by geographical segment.

Geographic analysis of gross loans and advances (notes 4, 8 and 9)[1]

	2023		2022	
	$m	**%**	$m	%
Sub-Saharan Africa	**692.8**	**11.6**	507.9	9.0
Asia-Pacific	**549.2**	**9.2**	946.2	16.8
Middle East and North Africa	**273.3**	**4.6**	482.8	8.6
Rest of Europe	**2,241.1**	**37.5**	1,970.8	35.0
Latin America	**188.4**	**3.2**	26.7	0.5
North America	**1,405.8**	**23.6**	1,233.0	21.9
Eurozone	**613.0**	**10.3**	461.3	8.2
	5,963.6	**100.0**	5,628.7	100.0

[1] Based on the borrower's country of risk

Geographic analysis of financial assets held for trading and non-trading financial assets at fair value through profit or loss[1]

	2023		2022	
	$m	**%**	$m	%
Sub-Saharan Africa	**2,465.8**	**59.5**	2,468.0	87.1
Asia-Pacific	**601.5**	**14.6**	132.7	4.7
Middle East and North Africa	**127.9**	**3.1**	28.0	1.0
Rest of Europe	**80.8**	**2.0**	126.9	4.5
Latin America	**2.2**	**0.1**	10.3	0.4
North America	**598.2**	**14.5**	65.5	2.3
Eurozone	**254.9**	**6.2**	-	-
	4,131.3	**100.0**	2,831.4	100.0

[1] Analysis of 'Government, utility bonds and treasury bills' and 'Corporate bonds and floating rate notes' as included in note 5, and 'Debt instruments', as included in note 6.

37 Risk management (continued)

37.6 Liquidity risk

Summary of performance (unaudited)

The Group's liquidity risk appetite statement (RAS) limits are measured through three metrics:

- Short term liquidity resilience: Total LAB holdings less the LAB requirement as calculated per the Bank's Individual Liquidity Guidance ("ILG")
- Short term liquidity resilience: Total LAB holdings less the LAB requirement over a 91-day survival horizon, as calculated by the Combined Internal Stress Test
- Long term liquidity resilience: Available stable funding less the amount of required stable funding, as calculated by the Net Stable Funding Ratio ("NSFR")

These limits ensure that the Group holds sufficient high-quality liquid assets (HQLA) to meet anticipated net contractual and contingent outflows under stress and also maintain stable sources of funding.

- Regulatory Requirement Surplus: The quantum of HQLA surplus held over the PRA's prescribed Internal Liquidity Guidance (ILG) requirement; and
- Combined Internal Stress Test Surplus: The quantum of HQLA surplus held over the Group's Combined Internal Stress test requirement.

These limits ensure that the Group holds sufficient HQLA to meet both regulatory requirements and the anticipated stressed net contractual and contingent outflows as determined by the Group's internal stress tests.

As at 31 December 2023, the LCR position was 183% (2022: 150%), and the Group held surplus HQLAs of:

- US$2,217 million over the PRA prescribed ILG requirement, measured at calendar day 30 (2022: US$2,130 million).
- US$2,749 million surplus over the constraining internal stress test requirement, measured at the low point of a 91-day survival horizon (2022: US$3,341 million).

As at 31 December 2023, the NSFR position was 159% (2022: 199%), with surplus stable funding of US$3,147 million (2022: US$4,447 million).

Liquidity stress testing

The Group operates an internal liquidity stress testing framework based on a number of stressed liquidity scenarios covering specific shocks to the Group ("Idiosyncratic stress scenario"), overall market conditions ("Market-wide stress scenario"), and a combination of both ("Combined stress scenario"). Each of these stress tests covers a 91-day survival period. The combined stress scenario is included in the RAS together with the Regulatory ILG. In addition, the Idiosyncratic and Market-wide stress scenarios are run for internal risk monitoring purposes to ensure the Group's survival horizon is tested across a range of severe but plausible stress events. Each of the stresses is specified to ensure that all material on- and off-balance sheet funding and liquidity risks are captured and mitigated.

The Group's reverse stress testing framework supplements the internal stress testing framework and assesses certain scenarios and circumstances that would render the Group's business model unviable, by identifying potential business vulnerabilities.

37 Risk management (continued)

37.6 Liquidity risk (continued)

Liquidity and funding risk monitoring

In addition to RAS limits, the Group has further early warning indicators (EWIs) and monitoring indicators that can identify the emergence of increased liquidity risk based on the assumptions and liquidity risk drivers which are of particular relevance to the Group's business model. These are supplemented by the annual review of the liquidity limit/EWI monitoring policy and the stress testing methodologies, to inform the setting of RAS.

Structural requirements

Maturity analysis of liabilities provides the basis for management of the Group's exposure to structural liquidity risk. The table below shows the contractual amounts of all financial liabilities and certain non-financial liabilities based on the earliest date on which the Group can be required to repay. This differs from the balance sheet carrying values, which are typically disclosed on a discounted basis. The table also includes contractual cash flows with respect to off-balance sheet items. Where cash flows are exchanged simultaneously, the net amounts have been reflected.

2023	**Redeemable on demand $m**	**Maturing within 1 month $m**	**Maturing 1 – 6 months $m**	**Maturing 6 - 12 months $m**	**Maturing after 12 months $m**	**Total $m**
Financial liabilities						
Financial liabilities held for trading	433.6	222.4	100.5	62.5	1,013.2	**1,832.2**
Non-trading financial liabilities at fair value through profit or loss	-	300.0	404.0	2,410.4	744.7	**3,859.1**
Derivative financial liabilities	-	696.3	1,372.4	542.3	1,171.2	**3,782.2**
Deposits[1]	2,199.6	2,611.0	1,215.1	469.0	2,636.4	**9,131.1**
Subordinated debt	-	2.1	5.8	3.7	307.4	**319.0**
Total balance sheet financial liabilities	**2,633.2**	**3,831.8**	**3,097.8**	**3,487.9**	**5,872.9**	**18,923.6**
Guarantees	-	-	-	70.1	32.8	**102.9**
Irrevocable unutilised facilities	-	-	90.2	27.9	393.1	**511.2**
Total off-balance sheet financial liabilities	**-**	**-**	**90.2**	**98.0**	**425.9**	**614.1**
Total financial liabilities	**2,633.2**	**3,831.8**	**3,188.0**	**3,585.9**	**6,298.8**	**19,537.7**
Precious metal payables[2]	3,140.6	-	-	-	-	**3,140.6**
Total liabilities	**5,773.8**	**3,831.8**	**3,188.0**	**3,585.9**	**6,298.8**	**22,678.3**

2022	Redeemable on demand $m	Maturing within 1 month $m	Maturing 1 – 6 months $m	Maturing 6 - 12 months $m	Maturing after 12 months $m	Total $m
Financial liabilities						
Financial liabilities held for trading	242.1	65.5	146.1	167.6	955.5	1,576.8
Non-trading financial liabilities at fair value through profit or loss	-	0.6	23.6	2,090.4	937.7	3,052.3
Derivative financial liabilities	21.3	887.5	2,022.9	853.9	1,567.2	5,352.8
Deposits[1]	2,095.3	2,531.3	418.5	127.6	3,463.5	8,636.2
Subordinated debt	-	2.1	5.6	7.8	350.4	365.9
Total balance sheet financial liabilities	2,358.7	3,487.0	2,616.7	3,247.3	7,274.3	18,984.0
Guarantees	-	-	68.3	-	44.1	112.4
Irrevocable unutilised facilities	-	-	11.7	-	224.2	235.9
Total off-balance sheet financial liabilities	-	-	80.0	-	268.3	348.3
Total financial liabilities	2,358.7	3,487.0	2,696.7	3,247.3	7,542.6	19,332.3
Precious metal payables[2]	2,395.5	-	-	-	-	2,395.5
Total liabilities	4,754.2	3,487.0	2,696.7	3,247.3	7,542.6	21,727.8

[1] Includes due to banks and other financial institutions, repurchase agreements, and due to customers.

[2] The maturity analysis has been expanded to include certain non-financial liabilities, comprising Precious metal payables, which represent the obligation to return Precious metals to customers, and are redeemable on demand.

37 Risk management (continued)

37.7 Market risk

Definition

Market risk is the risk of loss arising from potential adverse changes in the value of the Group's assets and liabilities from fluctuation in market variables including, but not limited to, interest rates, foreign exchange rates, equity prices, commodity prices, credit spreads, implied volatilities and asset correlations.

The Group's exposure to market risk is separated into two portfolios: trading portfolios and non-trading portfolios.

Trading book market risk

Trading portfolios comprise positions held for the purpose of market making for clients, with the intention of short-term resale and/or to hedge risks resulting from such positions.

Non-trading market risk

Market risk arising in non-trading portfolios consists primarily of interest rate risk arising from banking book assets and liabilities, financial assets held at fair value through other comprehensive income and debt instruments measured at amortised cost.

Framework and governance

There has been no material change to the framework and governance for managing market risk in 2023.

The Board approves the Level 1 management VaR limit for market risk appetite and has delegated authority to BRMC to provide independent and objective oversight of market risk. The Board delegates responsibility for management of risk to the CRO, including the design, implementation and monitoring of plans and processes. The RMC is responsible for monitoring and reviewing exposures of market risk and adherence to the agreed risk appetite. The Market and Liquidity Risk Committee (MLRC) is responsible for supervising the Group's market risk activities and the correct application of its market risk policies.

Market risk management monitors market risk exposures arising from both trading and banking activities. All exposures and any limit excesses are monitored daily, and reported monthly to MLRC. Breaches of level 1 limits (limits defining the market risk appetite of the Group approved by the Board) are also reported to RMC and BRMC.

Market risk measurement

The techniques used to measure and control market risk include:

- daily value at risk (VaR) and stressed value at risk (SVaR);
- stress tests;
- risk factor market risk measures;
- economic value of equity;
- earnings adjusted economic value (EAEV); and
- annual net interest income at risk.

37 Risk management (continued)

37.7 Market risk (continued)

Daily VaR and stressed VaR (SVaR)

VaR is a method for estimating potential losses from market risk exposure over a specified time horizon and level of confidence.

The Group uses the historical simulation approach based on potential market movements applied to the current trading portfolio, calculated with reference to market price data from the past year, with a confidence level of 99%. A holding period of one day is used for risk management purposes, while a period of 10 days is also used for regulatory VaR.

The 99% 10-day SVaR uses a similar calculation methodology to the 99% 10-day VaR. However, SVaR uses an observation window based on a continuous one-year period of financial stress for the trading portfolio. This one-year period of financial stress is selected from historical data going back to 2007, and is reviewed at least on a monthly basis.

Although a useful guide to market risk, VaR has limitations which include:

- The use of historical data as a proxy for estimating future events may not encompass all potential events, particularly those that are extreme in nature.
- The use of a one-day or 10-day holding period assumes that all positions can be liquidated or the risk offset in one day or 10-days respectively. This may not reflect the market risk arising at times of severe illiquidity, when a one-day or 10-day holding period may be insufficient to liquidate or hedge positions fully.
- The use of a 99% confidence interval, by definition, does not consider losses that might occur beyond this level of confidence.
- VaR is calculated on the basis of exposures outstanding at the close of business and, therefore, does not necessarily reflect intraday exposures.

Risk not in VaR (RNIV) framework

The RNIV framework captures the material risks which are not covered, or not adequately covered, by the VaR and SVaR. These risk factors are quantified in the RNIV framework either through a VaR-based approach or a stress test approach.

Backtesting

The Group monitors the performance of the VaR model via daily backtesting against both hypothetical and actual profit and loss. Hypothetical profit and loss estimates the daily profit and loss had the portfolio been held constant from the end of the previous trading day (it therefore excludes revenue from intra-day trading). Non-modelled items such as fees and commissions are also excluded from hypothetical profit and loss.

A backtesting exception occurs when a hypothetical or actual loss exceeds the level predicted by the VaR. At a 99% confidence level, we expect to see two to three exceptions per year.

During the year, the Group experienced one negative back-testing exception at a 99% confidence level. This exception was related to a restructuring event on Ghanaian sovereign bonds.

Stress tests

Stress testing provides an indication of the potential losses that could occur under extreme but plausible market conditions, including situations when longer holding periods may be required to exit positions. Potential losses in such scenarios may be much greater than the potential losses indicated by the VaR.

37 Risk management (continued)

37.7 Market risk (continued)

Stress tests comprise of a range of historical, hypothetical and point of weakness scenarios, across both individual risk factors and combinations of risk factors.

The risk appetite to these potential stress losses is quantified and monitored through a level 1 limit.

Other market risk measures

Other market risk measures specific to individual business units include permissible instruments, concentration of exposures, gap limits, maximum tenor and stop loss triggers.

Stop loss triggers are designed to contain losses for individual business units by requiring management intervention at predetermined loss levels measured against the individual high-water mark year-to-date profit and loss. Other risk measures specific to individual business units are also used.

New pricing models are independently documented and validated. Both annual and less frequent comprehensive reviews of existing models are performed to ensure they are still relevant and behaving within expectations.

Analysis of trading book market risk exposures

The following tables show the aggregated historical VaR and SVaR for the Group's trading positions. The maximum and minimum amounts show the bands in which the values at risk fluctuated during the periods specified.

	1 Day VaR[2]			
2023	**Maximum[1] $m**	**Minimum[1] $m**	**Average $m**	**Year end $m**
Commodities	2.7	0.4	1.0	0.8
Foreign exchange	8.3	1.2	3.2	6.4
Interest rate risk (general and specific)[5]	21.0	3.6	9.3	4.1
Diversification benefit[4]				(4.0)
Total (including diversification)	**19.0**	**4.3**	**9.2**	**7.3**

	10 Day VaR[3]			
2023	**Maximum[1] $m**	**Minimum[1] $m**	**Average $m**	**Year end $m**
Commodities	11.3	0.7	3.6	6.3
Foreign exchange	29.9	3.3	10.4	6.3
Interest rate risk (general and specific)[5]	45.9	11.3	29.4	45.9
Diversification benefit[4]				(13.8)
Total (including diversification)	**56.2**	**14.3**	**33.2**	**44.7**

	1 Day VaR[2]			
2022	Maximum[1] $m	Minimum[1] $m	Average $m	Year end $m
Commodities	8.3	0.5	3.2	2.1
Foreign exchange	13.3	1.1	3.5	2.3
Interest rate risk (general and specific)[5]	74.0	2.3	18.0	16.2
Diversification benefit[4]				(9.5)
Total (including diversification)	73.1	5.7	18.8	11.1

37 Risk management (continued)

37.7 Market risk (continued)

	10 Day VaR[3]			
	Maximum[1]	Minimum[1]	Average	Year end
2022	$m	$m	$m	$m
Commodities	21.6	0.9	5.9	5.3
Foreign exchange	18.8	2.8	7.5	5.8
Interest rate risk (general and specific)[5]	106.5	16.4	35.0	34.7
Diversification benefit[4]				(18.1)
Total (including diversification)	108.8	12.4	39.0	27.7

[1] The maximum and minimum VaR figures reported for each market variable did not necessarily occur on the same days. As a result, the aggregate VaR will not equal the sum of the individual market VaR values, and it is inappropriate to ascribe a diversification effect to VaR when these values may have occurred on different dates.
[2] Normal VaR is based on a holding period of one day and a confidence interval of 99%.
[3] Stress VaR is based on a holding period of 10 days and a confidence interval of 99%.
[4] Diversification benefit is the benefit of measuring the VaR of the trading portfolio as a whole, i.e. the difference between the sum of the individual VaRs and measuring the VaR of the whole trading portfolio.
[5] The Russian invasion of Ukraine in February 2022 and resultant sanctions placed against Russia, resulted in trades being unwound with Russian counterparties. The residual RUB interest rate and foreign exchange exposure, combined with an increase in market volatility resulted in an increase in the one-day 99% VaR and 10-day 99% VaR.

Analysis of Interest Rate Risk in the Banking Book (IRRBB) (unaudited)

Interest Rate Risk in the Banking Book ("IRRBB") is the current or prospective risk to the Group's economic value or earnings arising from adverse movements in market interest rates. It is generated by the Group's non-traded assets and liabilities, specifically loans, deposits, and other financial instruments and liquidity assets that are not held for trading intent or in order to hedge positions held with trading intent. The Group seeks to centralise and manage IRRBB in line with the Risk Appetite Statement. ICBCS considers Credit Spread Risk in the Banking Book (CSRBB) within the Bank's overall IRRBB Risk Appetite Statement and limits.

The main analytical techniques used to quantify banking book interest rate risk are:

a) Economic Value of Equity (EVE) metric – measures changes in the net present value of equity to changes in interest rates under eight regulatory prescribed interest rate stress shocks.

b) Earnings Adjusted Economic Value (EAEV) – the EAEV metric is derived from the same principles as the EVE metric, only differing for specific adjustments applied for the Equity Structural Hedge (ESH) execution (the fixed rate assets that form part of the ESH are excluded).

c) Net Interest Income (NII) metric – measures changes in expected potential future profitability within a given time horizon (one year), resulting from regulatory prescribed interest rate stress shocks.

The Group primarily uses the EAEV metric for IRRBB risk management purposes and to determine Economic Capital requirements. The EVE metric is utilized for Regulatory Supervisory outlier test assessment. The NII metric is used for risk monitoring purposes. Desired changes to a particular interest rate risk profile are achieved through modification of balance sheet exposure profiles or by the use of derivative instruments, such as interest rate swaps or by investing in fixed income securities. IRRBB interest rate risk limits for ICBCS are set using the EAEV metric.

37 Risk management (continued)

37.7 Market risk (continued)

The Bank has moved away from an EVE approach to an EAEV approach for capitalization of IRRBB risks under Pillar 2 and for IRRBB internal risk management purposes. This follows investment by the Bank in an ESH program in 2023, in order to reduce future earnings volatility. The Bank targets a range up to a maximum of 80% of the equity base to be utilized for the ESH programme, with the remaining unhedged portion of 20% available to meet losses (and thus avoid the need to sell assets to rebalance the hedge in this eventuality). This capacity to absorb losses is based on the ICBCS four-year capital stress scenario. The target weighted average life of the fixed income instruments comprising the ESH is two and a half years.

For IRRBB Economic Capital (Ecap) assessments, the worst of the following shock scenarios from the EAEV metric are taken in to account, plus any non-modelled IRRBB risk add-ons and an add-on for Credit Spread Risk in the Banking Book (CSRBB) quantified by the Risk team.

IRRBB Ecap assessment shocks:

- parallel 200bps rates up/down shocks (as indicated in the table below); or
- the six prescribed scenario shocks (Parallel Up, Parallel Down, Flattener – Short Rates Up and Long Rates Down, Steepner – Short Rates Down and Long Rates Up, Short Rates Up and Short Rates Down)

a) Economic Value of Equity (EVE) metric

EVE is a valuations based metric which assesses changes in the net present value of all cash flows originating from banking book assets and liabilities as a result of pre-specified movements in market interest rates under a variety of shock scenarios.

All banking book assets, liabilities and off-balance sheet items are placed in time bands (gap intervals) based on their interest rate repricing or cash flow expectation dates. The EVE model calculates IRRBB by currency and applies maturity dependent post shock floors as per the regulatory guidance.

The EVE metric is computed with the following assumptions:

- A run-off balance sheet approach where maturing trades are not replaced by new business as they mature;
- Equity is excluded from the metric;
- All downside shocks are floored to minus one per cent and the flooring assumptions are periodically reviewed for relevance, in accordance with the regulatory guidance.

The repricing gaps for the Group's non-trading portfolios are shown below. This view is for the purpose of illustration only, as positions are managed by currency to take account of the fact that interest rate changes are unlikely to be perfectly correlated.

37 Risk management (continued)

37.7 Market risk (continued)

Repricing gap for non-trading portfolios

2023	0-3 months $m	3-6 months $m	6-12 months $m	>12 months $m
Interest rate sensitivity gap	**1,148.9**	**321.0**	**(32.4)**	**1,053.1**
Cumulative interest rate sensitivity gap	**1,148.9**	**1,469.9**	**1,437.5**	**2,490.6**
Cumulative interest rate sensitivity gap as a percentage of total banking assets	**10.8%**	**13.9%**	**13.5%**	**23.5%**

2022	0-3 months $m	3-6 months $m	6-12 months $m	>12 months $m
Interest rate sensitivity gap	1,517.0	(110.7)	116.9	(43.0)
Cumulative interest rate sensitivity gap	1,517.0	1,406.3	1,523.2	1,480.2
Cumulative interest rate sensitivity gap as a percentage of total banking assets	15.5%	14.3%	15.5%	15.1%

Sensitivity of Economic Value of Equity to changes in interest rates

The table below indicates the sensitivity in US Dollar equivalents of the Group's banking book EVE in response to a change in interest rates, after considering all risk mitigating instruments, with all other variables held constant. The Group has modelled changes of 200 basis points as this is consistent with those used for regulatory purposes.

The final sensitivity numbers shown below are excluding IRRBB EVE non-modelled risk add-ons and CSRBB. During the year, sensitivities have increased in the 'greater than 12 months' bucket as expected, due to the purchase of the ESH bonds. The mismatch in this bucket is because, whilst the ESH bonds are included, the equity that is funding the ESH portfolio is not included as per the regulatory guidelines when calculating the EVE. ICBCS constructs its ESH with a tenor of five years and a weighted average life of two and a half years, targeting a linear amortization of monthly maturities.

	Increase in basis points	0-3 months	3-6 months	6-12 months	>12 months
2023		**$m**	**$m**	**$m**	**$m**
2% up (interest-rate increase)	**200**	**3.9**	**(2.6)**	**0.6**	**(58.5)**
2% down (interest-rate decrease)	**200**	**(3.9)**	**2.6**	**(0.6)**	**62.6**

	Increase in basis points	0-3 months	3-6 months	6-12 months	>12 months
2022		$m	$m	$m	$m
2% up (interest-rate increase)	200	1.1	0.9	(1.6)	1.7
2% down (interest-rate decrease)	200	(1.1)	(1.0)	1.6	(1.8)

b) Earnings Adjusted Economic Value (EAEV) metric

The EAEV metric is derived from the principles of the EVE metric, with specific adjustments for the ESH execution. This exclusion of the fixed rate assets that form part of the ESH, is in accordance with Basel SRP 98 – Application guidance on IRRBB, which outlines the exclusion of both the equity and the assets it finances when using an EAEV metric for IRRBB risk assessments. ICBCS adopted an EAEV metric in 2023 for IRRBB risk appetite management purposes.

37 Risk management (continued)

37.7 Market risk (continued)

Repricing gap for non-trading portfolios

2023	0-3 months $m	3-6 months $m	6-12 months $m	>12 months $m
Interest rate sensitivity gap	**1,078.1**	**257.4**	**(169.9)**	**(3.1)**
Cumulative interest rate sensitivity gap	**1,078.1**	**1,335.5**	**1,165.6**	**1,162.5**
Cumulative interest rate sensitivity gap as a percentage of total banking assets	**10.2%**	**12.6%**	**11.0%**	**11.0%**

Sensitivity of EAEV to changes in interest rates

The table below indicates the sensitivity in US Dollar equivalents of the Group's banking book EAEV in response to a change in interest rates, after considering all risk mitigating instruments, with all other variables held constant. The Group has modelled changes of 200 basis points as this is consistent with those used for regulatory purposes.

The EAEV sensitivity to a parallel 200bps shock up/down of interest rates at 31 December 2023 is set out below. The final sensitivity numbers shown below are excluding IRRBB EAEV non-modelled risk add-ons and CSRBB. There is no comparative data for the prior year as the EAEV model was implemented in 2023.

2023	Increase in basis points	0-3 months $m	3-6 months $m	6-12 months $m	>12 months $m
2% up (interest-rate increase)	**200**	**4.1**	**(2.1)**	**2.6**	**4.7**
2% down (interest-rate decrease)	**200**	**(4.1)**	**2.1**	**(2.6)**	**(4.8)**

c) Net Interest Income (NII) metric

NII is an earnings-based measure, which assesses the change in expected potential future profitability resulting from prescribed movements in market interest rates under a variety of shock scenarios. NII sensitivity is calculated as the change in NII (due to rate shock scenarios) over a set observation period compared with the base scenario.

In accordance with regulatory guidance, all interest-bearing products in the Banking Book are captured in the NII calculations. Off-balance sheet products and equity, given it is not an interest-bearing product, are excluded. All cash flows of interest rate sensitive instruments are mapped to exact repricing dates of individual positions.

The NII metric is computed with the following key assumptions:

- A static balance sheet approach where maturing assets and liabilities are replaced like-for-like to maintain balance sheet size and shape;
- No proactive management actions undertaken throughout the year;
- The Group has opted to use a one-year observation period; and
- All downside shocks are floored to minus one per cent and the flooring assumptions are periodically reviewed for relevance, in accordance with the regulatory guidance.

37 Risk management (continued)

37.7 Market risk (continued)

Sensitivity of Net Interest Income to changes in interest rates

The table below shows NII sensitivity at 31 December 2023 in a one-year time horizon (observatory period) to a parallel +/- 200bps shock of the interest rate curve. The reduction of NII sensitivity in 2023 is largely due to the implementation of the ESH programme as described above.

	Increase in basis points	P&L Volatility for a 1 year period
2023		**$m**
2% up (interest-rate increase)	**200.0**	**7.9**
2% down (interest-rate decrease)	**200.0**	**(7.9)**

	Increase in basis points	P&L Volatility for a 1 year period
2022		$m
2% up (interest-rate increase)	200.0	43.1
2% down (interest-rate decrease)	200.0	(43.1)

Foreign exchange risk

The Group's foreign exchange positions arise from mandated transaction or translational activity. All foreign exchange risk is governed by currency limits approved by the MLRC in accordance with the Group's market risk policy. Currency limits are subject to review annually and foreign exchange exposures are monitored daily by the market risk function and reviewed monthly to ensure they remain within the approved risk appetite.

Net investment in foreign operations

Functional currency	2023 $m	2022 $m
Chinese Renminbi	**29.6**	**29.5**

37 Risk management (continued)

37.8 Operational risk (unaudited)

Introduction
Operational risk exists in the natural course of business activity. The Group's approach to managing operational risk is to adopt appropriate operational risk practices that assist business line management in understanding their inherent risk and reducing their risk profile while maximising their operational performance and efficiency.

The operational risk management (ORM) function is responsible for the development and maintenance of the operational risk policy, facilitating business's adoption of the framework, oversight and reporting, as well as for challenging the risk profile. It proactively analyses incident root causes, trends and emerging threats, advises on the remediation of potential control weaknesses and recommends best practice solutions.

The management and measurement of operational risk
The ORM framework follows a largely qualitative approach, being focused on ensuring that underlying risks are identified and managed and that the residual risk is maintained within an acceptable level, overseen by an independent operational risk function within risk management.

The ORM framework includes qualitative and quantitative (i.e. scenario analysis) methodologies and tools to assist management to identify, assess and monitor operational risks and provide management with information for determining appropriate controls and mitigating measures. The framework is based around risk and control self-assessments (RCSA), key indicators (KIs), control assurance and incident reporting. Escalation criteria are in place to ensure that management action can be applied in the event that RCSAs or KIs show a level of residual risk exposure beyond that deemed acceptable and when an individual incident breaches a set materiality threshold. In addition, a loss tolerance threshold is set by senior management for aggregate losses. The Bank supplements these qualitative and quantitative approaches with scenario analysis and a capital model, which is used for calculating the economic capital requirements for RAS purposes.

Historical losses are reviewed, to ensure that adequate management action is taken in respect of the root cause of loss and near miss incidents. Losses are recorded in the operational incident database.

Given the broad and diverse nature of the above definition of Operational Risk, there are specialist operational risk sub-types which are governed under specific governance standards or equivalent documents and are enforced through independent dedicated specialist functions, which include legal and compliance risk, business conduct risk, data and information technology risk, tax risk, insurance risk and environmental risk.

37.9 Reputational risk (unaudited)

Reputational risk results from damage to the Group's public image which may impair its ability to retain and generate business. Such damage could result from a breakdown of trust, confidence or business relationships for a wide variety of reasons.

37.10 Capital management

The Group manages its capital resources and requirements to:

- achieve a prudent balance between maintaining capital ratios to support business strategy and depositor confidence, and providing competitive returns to shareholders; and
- ensure that its actions do not compromise sound governance and appropriate business practices and minimises any negative effect on payment capacity, liquidity or profitability.

37 Risk management (continued)

37.10 Capital management (continued)

The Group is subject to regulation and supervision by the Prudential Regulation Authority (PRA) and the Financial Conduct Authority, and forms part of the ICBC group which is supervised by the National Financial Regulatory Administration (NFRA).

The Group is subject to the UK's prudential regime for banks, which implements the global regulatory standards set by the Basel Committee on Banking Supervision.

Economic capital (unaudited)

In addition to regulatory capital requirements, management also utilise more risk sensitive internal economic capital models to monitor and control the risk profile of the organisation. These cover capital adequacy as measured by the ratio of available financial resources to economic capital utilisation which forms part of the risk appetite.

Regulatory capital

The Group maintained surplus capital over the minimum requirements prescribed by the PRA throughout the year. The total capital requirement (TCR) prescribed by the PRA for the Group is 11.0% (2022: 11.3%).

Total available regulatory capital consists of the sum of two tiers:

- Tier I capital consists of the sum of common equity tier I, in the form of share capital and retained earnings less applicable regulatory deductions, and additional tier I capital instruments; and
- Tier II capital, which includes subordinated debt.

Risk-weighted assets are determined by applying prescribed risk weightings to on- and off-balance sheet exposures according to the relative credit risk of the counterparty. In addition, overall risk-weighted assets also include a notional risk weighting for market risks, counterparty risks and large exposure risks relating to trading activities.

Capital resources

The table below sets out the qualifying capital of the Group.

	2023 $m	2022 $m
Common Equity Tier 1		
Paid up capital instruments	**1,083.5**	1,083.5
Reserves	**627.5**	438.5
Less regulatory deductions (unaudited)	**(81.9)**	(67.4)
Total Common Equity Tier 1	**1,629.1**	1,454.6
Additional Tier 1		
Capital instruments	**160.0**	160.0
Total Additional Tier 1 Capital	**160.0**	160.0
Total Tier 1	**1,789.1**	1,614.6
Tier 2		
Subordinated debt instruments	**250.0**	250.0
Total Tier 2	**250.0**	250.0
Total eligible capital	**2,039.1**	1,864.6

38. Encumbered assets (unaudited)

The Group enters into transactions in the normal course of business by which it transfers recognised financial assets or commodity assets directly to third parties. These transfers may give rise to full or partial derecognition of the assets concerned. Where the Group has retained substantially all of the risks and rewards associated with the transferred assets, it continues to recognise those assets.

An asset is defined as encumbered if it has been pledged as collateral against an existing liability or used to secure, collateralise or credit enhance a transaction, which impacts its transferability and free use, and, as a result, it is no longer available to the Group to secure funding, satisfy collateral needs or be sold to reduce funding requirements. An asset is therefore categorised as unencumbered if it has not been pledged as collateral against an existing liability or used to secure, collateralise or credit enhance a transaction.

The Group is required to provide cash and/or securities margin placements with counterparties and clearing houses as part of its normal trading activities. These transactions are conducted under standard SIFMA/ICMA commissioned Global Master Repurchase Agreement (GMRA) terms and conditions.

Total encumbered assets inclusive of both pledged assets and cash margin placements at 31 December 2023 were US$2,593.2 million (2022: US$2,449.9 million).

39. Collateral accepted as security for assets

As part of the Group's financing activities, it receives securities, other financial assets and commodity assets that it is allowed to sell or re-pledge. Although the Group is obliged to return equivalent securities or other assets, the risks and rewards associated with those assets remain with the external counterparty and the securities or other assets are not recognised on the Group's balance sheet.

At 31 December 2023, the fair value of securities, other financial assets and commodity assets accepted as collateral that the Group is permitted to sell or re-pledge in the absence of default is US$3,027.6 million (2022: US$2,923.5 million). In addition, the Group held cash collateral of US$1,065.3 million at that date (2022: US$980.4 million). The fair value of financial assets accepted as collateral that have been sold or re-pledged at 31 December 2023 is US$823.4 million (2022: US$615.9 million). These transactions are conducted under standard SIFMA/ICMA commissioned GMRA/ISDA/FOA master agreement terms and conditions as well as requirements determined by exchanges where the Group acts as intermediary.

40. Ultimate holding company

The Company's ultimate parent and controlling party is Industrial and Commercial Bank of China Limited (ICBC Limited), a company incorporated in the People's Republic of China. The smallest and largest group into which the results of the Company are consolidated is that headed by ICBC Limited. Copies of the group accounts of ICBC Limited may be obtained from its website at the address below or from investor relations at the following address:

Industrial and Commercial Bank of China Limited
No. 55 Fuxingmennei Avenue
Xicheng District
Beijing 100140
The People's Republic of China
For more information on ICBC Group, please visit www.icbc.com.cn

17. Acronyms and abbreviations

BAC	Board Audit Committee	**KPI**	Key performance indicator
BOE	Bank of England	**LIBOR**	London Interbank Offered Rate
BRMC	Board risk management committee	**LCR**	Liquidity coverage ratio
BS&R	Business support and recovery	**LGD**	Loss given default
CBES	Climate Biennial Exploratory Scenario	**LNG**	Liquified natural gas
CEO	Chief Executive Officer	**LPG**	Liquified petroleum gas
CET1	Common equity tier 1 ratio	**MLRC**	Market and liquidity risk committee
CFO	Chief Financial Officer	**MRT**	Material risk taker
CI	Confidence intervals	**NBP**	National Balancing Point
CLAG	Credit Limit Appetite Guideline	**NFRA**	National Financial Regulatory Administration
COMEX	Commodity exchange	**NGO**	Non-governmental organisation
Company	ICBC Standard Bank Plc company	**NII**	Net Interest Income
CRO	Chief Risk Officer	**NSFR**	Net stable funding ratio
CSA	Credit Support Annex	**NYMEX**	New York Mercantile Exchange
CSRBB	Credit spread risk in the banking book	**OCI**	Other comprehensive income
CVA	Credit valuation adjustment	**OE**	Oxford Economics
DCM	Debt Capital Markets	**OpCo**	Operational risk committee
DEFRA	Department for Environment, Food and Rural Affairs	**OPEC**	Organization of the Petroleum Exporting Countries
DVA	Debit valuation adjustment	**ORM**	Operational risk management
EAD	Exposure at default	**OTC**	Over-the-counter
Ecap	Economic capital	**PCRA**	Physical Commodities Risk Assurance
ECL	Expected credit loss	**PD**	Probability of default
ED&I	Equality, Diversity and inclusion	**PGM**	Platinum group metals
ESG	Environmental, Social and Governance	**PIT**	Point-in-time
ESH	Equity Structural Hedge	**POCI**	Purchased or Originated Credit Impaired
EU	European Union	**PRA**	Prudential Regulation Authority
EV	Earnings adjusted Economic Value	**RAS**	Risk appetite statement
EVE	Economic value of equity	**RCSA**	Risk control self-assessment
EVP	Employee Value Proposition	**Remco**	Remuneration committee
EWI	Early warning indicator	**RFR**	Risk free rate
FCA	Financial Conduct Authority	**RMC**	Risk management committee
FIC	Fixed Income and Currencies	**RNIV**	Risk not in VaR
FOA	Futures and Options Association	**RWA**	Risk weighted assets
FVA	Funding valuation adjustment	**SACC**	South African Competition Commission
FVOCI	Fair value through other comprehensive income	**SBG**	Standard Bank Group Limited and subsidiaries
FVTPL	Fair value through profit or loss	**SBSA**	Standard Bank of South Africa Limited
GMRA	Global Master Repurchase Agreement	**SBLC**	Standby Letter of Credit
GHG	Greenhouse gases	**SDG**	United Nations Sustainable Development Goals
Group	ICBC Standard Bank Plc and its subsidiaries	**SDR**	Sustainability Disclosure Requirements
HQLA	High quality liquid asset	**SECR**	Streamlined Energy and Carbon Reporting
IAS	International Accounting Standards	**SHA**	Shareholder agreement
IBOR	Interbank offered rates	**SIFMA**	Securities Industry and Financial Markets Association
ICAAP	Internal capital adequacy assessment process	**SOE**	State owned enterprise
ICBC	Industrial and Commercial Bank of China Limited	**SOFR**	Secured overnight financing rate
ICBCS	ICBC Standard Bank Plc	**SPPI**	Solely payments of principal and interest
ICMA	International Capital Market Association	**SVaR**	Stressed Value-at-risk
IFRS	International Financial Reporting Standards as adopted by the UK	**TCFD**	Task Force on Climate-Related Financial Disclosures
ILAAP	Individual liquidity adequacy assessment process	**TCR**	Total capital requirement
ILG	Individual liquidity guidance	**TNFD**	Task Force on Nature-related Financial Disclosures
IMF	International Monetary Fund	**TPT**	Transition Plan Taskforce
IPV	Independent price verification	**TTC**	Through-the-cycle
IRRBB	Interest rate risk in the banking book	**UN**	United Nations
ISDA	International Swap Dealers Association	**VaR**	Value-at-risk
ISSB	International Sustainability Standards Board	**VAT**	Value added tax
IST	Internal stress test	**WWR**	Wrong way risk

18. Contact information

CHINA

ICBC Standard Resources (China) Limited
Unit 2302, ICBC Tower
No. 8 and 16 Yincheng Road
Shanghai 200120
The People's Republic of China

X Liu

General Manager

UNITED KINGDOM

ICBC Standard Bank Plc
20 Gresham Street
London EC2V 7JE England
United Kingdom

W Wang

Chief Executive

https://www.icbcstandardbank.com

SINGAPORE

ICBC Standard Bank Plc - Singapore branch
One George Street
No. 16-04
Singapore 049145

V Yu

Chief Executive

UNITED STATES OF AMERICA

ICBC Standard NY Holdings, Inc. group
28th Floor
520 Madison Avenue
New York
N.Y. 10022
USA

J Roncevich

Chief Executive

Notes

ICBC Standard Bank

ICBC Standard Bank | Financial Markets and Commodities
20 Gresham Street | London EC2V 7JE, United Kingdom

www.icbcstandard.com

20231121-15915-EC-ICBC