



HSBC BANK (VIET NAM) LTD.
CAPITAL ADEQUACY RATIO DISCLOSURE

As at 31 December 2024

According to Circular 41/2016/TT-NHNN dated 30 December 2016 and its amendments

**STATEMENT OF HSBC BANK (VIET NAM) LTD.'S LEGAL REPRESENTATIVE
DISCLOSURE ON CAPITAL ADEQUACY RATIO AS AT 31 DECEMBER 2024**

Item	Description	As at 31.12.2024 VND million	As at 31.12.2023 VND million
A	Capital (A) = (A1) + (A2) – (A3)	19,827,518	19,341,393
A1	Tier 1	19,410,383	18,942,938
A2	Tier 2	417,135	398,455
A3	Deductions from capital	-	-
B	Credit Risk-weighted assets (B) = (B1) + (B2)	89,624,191	90,098,383
B1	Credit risk	89,475,317	89,954,315
B2	Counterparty credit risk	148,874	144,068
C	Capital requirement for market risks (C) = (C1) + (C2)	-	8,925
C1	Interest rate risk	-	8,925
C2	Foreign exchange risk	-	-
D	Capital requirement for operational risks (D) = [(D1) + (D2) + (D3)]/3*15%	1,428,168	1,201,851
D1	Business Index (BI) – n year	9,582,330	10,846,365
D2	Business Index (BI) – n-1 year	10,846,365	8,134,673
D3	Business Index (BI) – n-2 year	8,134,673	5,055,991
E	Total Risk-weighted asset (E) = (B) + 12,5*[(C) + (D)]	107,476,291	105,233,083
Tier 1 CAR	Tier 1 Capital Adequacy Ratio (Tier 1 CAR) = (A1)/(E)	18.06%	18.00%
CAR	Capital Adequacy Ratio (CAR) = (A)/(E)	18.45%	18.38%

As at 31 December 2024, HSBC Bank Vietnam Ltd. (hereafter referred to as “HSBC Viet Nam”) reported Capital Adequacy Ratio at 18.45%. Capital base was reported at VND 19,827 billion, of which, Tier 1 capital was VND 19,410 billion and Tier 2 capital was VND 417 billion.

HSBC Viet Nam does not have any subsidiaries, associate parties and does not incur any deduction from capital at the reporting date.

Capital Adequacy Ratio is calculated automatically by designated software built based on Circular No. 41/2016/TT-NHNN dated 30 December 2016 on Capital Adequacy Ratio for banks and branch of foreign banks (Circular 41) and its amendments.

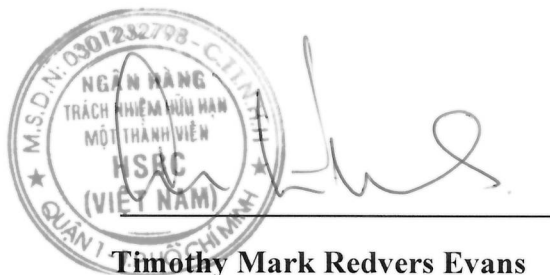
According to the Implementation and Compliance assessment in HSBC Vietnam's 2024 Internal Capital Adequacy Assessment Report, HSBC Viet Nam's Capital adequacy ratio has been stable and higher than the regulatory limit guided by the State Bank of Vietnam ("the SBV") and HSBC Vietnam's 2024 CAR target ratio. CAR ratio is forecasted to be operated at healthy level in the next 3 years. Accordingly, there is no plan to increase capital base in the upcoming period.

HSBC Viet Nam, on annual basis, continues to allocate 20% profit after tax to supplement charter capital and financial reserves as per the local regulation. Besides, HSBC Vietnam also prepare (as part of our contingency plan) the capital increase plan under stress scenarios as documented in the Internal Capital Adequacy Assessment Report, in which case, the following actions for capital increase can be considered:

- Adjust profits remittance to the parent bank
- Raising Tier 2 Capital
- Controlling customer loans
- Implementing other risk assets management and risk mitigation actions
- Reducing costs

I hereby approve the disclosure statement of Capital Adequacy Ratio as at 31 December 2024 and further details from page 3 to page 16 for HSBC Viet Nam.

Ho Chi Minh City, 21 March 2025



Timothy Mark Redvers Evans
Chief Executive Officer and
Legal Representative



Nguyen Thi Thanh Truc
Chief Financial Officer and
Chief Accountant

I. THE CALCULATION PROCESS OF CAPITAL ADEQUACY RATIO

Capital Adequacy Ratio calculation process includes:

- Collect relevant data from data sources and relevant departments
- Process and calculate Capital Adequacy Ratio using application software
- Extract reports and validate the results
- Analyse and report Capital Adequacy Ratio

II. CREDIT RISK**A. Qualitative aspects****1. Risk management**

The Members' Council is responsible for the bank's overall risk management and for approving the risk management strategies and principles through risk governance and escalation from Risk Management Committee (RMC) and Risk Management Meeting (RMM). Monitoring and controlling risk is primarily based on reporting and limits established by HSBC Viet Nam, overviewed by HSBC Group and regulated by the State Bank of Vietnam ("the SBV"). Risk Settlement Committee assesses the appropriateness of the provision for credit losses on an on-going basis.

HSBC Viet Nam follows the HSBC Risk Management Framework (RMF) for the overall risk management to achieve its strategic aims. The day-to-day risk management responsibilities are delegated to individuals within the senior management team. These individuals are accountable for their assigned risks, and report and escalate as necessary through the risk governance structures. Policies, procedures and limits are defined to ensure that business activities remain within risk appetite.

All employees have a role to play in risk management. These roles are defined using the Three Lines of Defence model which is based on the activities performed. This model consists of the First Line of Defence ("LOD") (Risk Owner, Control Owner and Chief Control Officer), Second LOD (Risk Stewards) and Third LOD (Internal Audit). The model delineates management accountabilities and responsibilities for risk management and the control environment within each LOD, thereby creating a robust control environment to manage risks.

2. Credit Risk management

Credit risk is defined and controlled by the Bank based on a well-defined credit risk management strategy. The strategy is also a solid foundation to build up the credit risk management structure, internal credit rating system, and credit risk controlling measurements.

(i) Credit risk management strategy

The strategy is defined in the Country Risk Plan (CRP) for Wholesale Banking (WSB) and in the Retail Credit Activities for Wealth and Personal Banking (WPB), which focuses on business development activity to optimize the prevailing operating model and business environment. The key business strategies are as follows:

- Support business growth within credit risk appetite of the bank
- Achieve and maintain risk assets of high quality
- Control and management of risk, minimize credit losses whilst enhancing risk-adjusted returns.

(ii) Credit risk management structure

HSBC Viet Nam develops the appropriate structure to manage credit risk. According to Circular No.13/2018/TT-NHNN dated 18 May 20218, the credit risk approval team is the first LOD. The lending functions are segregated:

- Credit Risk Management: For WSB, the Risk function is responsible for asset quality management and recovery. For WPB, the Risk function is responsible for establishing lending internal procedures, asset quality management and reporting of credit metrics per Group requirement/ SBV's regulation. Risk executives have a clear modus operandi and authority, and Risk functions are staffed by personnel with asset quality management and loan management. Wholesale Credit Risk Management (WCRM) also has staff personnel for recovery experience.
- Relationship Management: where the credit process has become segmented for reasons of efficiency, frontline Relationship Managers should retain principal responsibilities for the effectiveness of each aspect of the management of relationships
- Credit Operations/Administration: manage security documentation, disbursement and monitor loan payment.

(iii) Credit rating system

HSBC Viet Nam applies a Credit Risk Rating system on credit customers to assign internal ratings that allow consistent and accurate differentiation between high and low risk customers and their facilities. In addition, various risk assessment tools and analytical scoring models are introduced to yield measures of Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD) as key drivers of credit risk management in the Group risk rating systems.

(iv) Credit risk measurements and control

Wholesale Banking (WSB): Credit risks of the corporate lending portfolio is strictly managed and controlled by the management team, WCRM, WSB and the Operations Department. On a periodic basis, reports, meetings and sample checks are conducted to mitigate credit risks and provide further assurance that these are operating as expected. A brief about measurements for controlling of credit risks are listed out as below:

- Regular update on the overall status of credit risk management to RMM
- Risk Management Committee meetings on an on-going basis
- Wholesale Credit Review Unit (WCRU) review

- Daily monitoring of excesses and overdue loans
- Monthly WSB EXCO
- Monthly sampling process
- Watch-Worry-Monitor (WWM) meeting
- Wholesale Banking Risk Control Management Meeting (WSB RCMM).

Wealth and Personal Banking (WPB): Retail credit risk is managed over the risk management cycle which consists of six stage:

- Planning products and risk management controls
- Acquiring accounts
- Maintaining accounts and managing credit quality
- Collecting delinquencies
- Bad debt management
- Evaluating performance and refining plans and controls.

The credit risk in Retail Banking is strictly monitored and controlled by the Management Board, WPB, WPB Risk and Operation Department. Internal policies, guidelines, risk management procedures and reports are developed and implemented synchronously and consistently to ensure compliance with the group's laws and regulations. These documents prescribe general and detailed management frameworks, including but not limited to credit risk management, credit risk appetite, credit limit for each customer, approval authority, collateral, credit policies and procedures for customer segments, etc.

Regular monitoring of new credit applications through sample check, portfolio management review in order to identify early warning signs is carried out by the second line of defense – WPB Risk. Notable findings and recommendations are reported to governance meetings regularly.

The Risk Settlement Council plays an advisory role and performs the tasks and powers assigned by the Members' Council in supervising debt classification, setting up provisions and using reserves for write-off. The reporting and monitoring are carried out in accordance with the State Bank' regulations and the Group's standards.

In order to respond promptly to any early warning signs, appropriate plans will be put in place to manage bad debts and set aside provisions in accordance with current regulations. In addition, the Bank implements ad-hoc reports to strengthen supervision of overdue debts as a proactive measure in controlling newly arising bad debts as well as assess the recovery plan from the collateral. All approved bad debt reports are submitted to the SBV on time.

HSBC Viet Nam has conducted debt restructure and retention of debt category to assist borrowers have difficulty in business and in payment capacity for loans served for living purpose in accordance with Circular No. 02/2023/TT-NHNN dated 23 Apr 2023 amended by Circular 06/2024/TT-NHNN dated 18 Jun 2024. In addition, since 4 Dec 2024, HSBC Viet Nam conducts debt restructure, retention of debt category to assist borrowers facing difficulties due to the impact and damage from Typhoon No. 3 in accordance with Circular 53/2024/TT-NHNN dated 4 Dec 2024 by SBV and Decision 1510_QD-TTg-634266 dated 4 Dec 2024 by Prime Minister. The moratorium support is subject to clients' request and the bank's internal credit assessment.

3. List of independent credit rating agencies used for Capital Adequacy Ratio calculation

HSBC Viet Nam uses independent credit rating issued by International Credit of rating agencies such as Moody's, Fitch and Standard & Poor's.

4. Credit risk mitigation

HSBC Viet Nam uses term deposit as collateral and third-party guarantee as credit risk mitigation in Capital Adequacy ratio calculation as at 31 December 2024.

B. Quantitative aspects
1. Credit risk according to credit rating
Receivables from credit institutions, risk-weight and credit risk-weighted assets

31/12/2024	Credit rating	Vaule of the Receivables (*) VND million	Credit risk-weight (%)	Credit risk-weighted assets VND million
Recievables from foreign financial institutions	From AAA to AA-	41,386,943	20	8,277,389
	From A+ to BBB-	362,644	50	181,322
	From BB+ to B-	-	100	-
	Under B- or no rating available	358,226	150	537,339
Receivables from local credit institution with original term over 3 months	From AAA to AA-	-	20	-
	From A+ to BBB	-	50	-
	From BB+ to BB-	1,738,125	80	1,390,500
	From B+ to B-	-	100	-
	Under B- or no rating available	1,421,865	150	2,132,798
Receivables from local credit institution with original term under 3 months	From AAA to AA-	-	10	-
	From A+ to BBB	-	20	-
	From BB+ to BB-	1,054,240	40	421,696
	From B+ to B-	-	50	-
	Under B- or no rating available	74,115	70	51,881
Total		46,396,158		12,992,925

(*): Value of the receivables is the balance after applying risk mistigations and specific provision (if any).

Receivables from credit institutions, risk-weight and credit risk-weighted assets

31/12/2023	Credit rating	Value of the Receivables (*) VND million	Credit risk-weight (%)	Credit risk-weighted assets VND million
Receivables from foreign financial institutions	From AAA to AA-	73,761,325	20	14,752,265
	From A+ to BBB-	371,343	50	185,672
	From BB+ to B-	-	100	-
	Under B- or no rating available	25,880	150	38,820
Receivables from local credit institution with original term over 3 months	From AAA to AA-	-	20	-
	From A+ to BBB	-	50	-
	From BB+ to BB-	1,942,533	80	1,554,026
	From B+ to B-	-	100	-
	Under B- or no rating available	1,230,616	150	1,845,924
Receivables from local credit institution with original term under 3 months	From AAA to AA-	-	10	-
	From A+ to BBB	-	20	-
	From BB+ to BB-	997,275	40	398,910
	From B+ to B-	1,115	50	558
	Under B- or no rating available	-	70	-
Total		78,330,087		18,776,175

(*): Value of the receivables is the balance after applying risk mistigations and specific provision (if any).

2. Risk weighted assets
Credit risk-weighted assets classified by different customer type

	31.12.2024	31.12.2023
	VND million	VND million
Receivables from Government	-	-
Receivables from Financial Institution	12,992,925	18,776,175
Receivables from Corporate	63,637,450	58,202,004
Secured Loans by Real estate	140,053	809,346
Mortgage home Loans	1,916,017	1,560,652
Retail Loans	9,559,010	9,543,957
Bad debt	357,648	254,082
Other assets	872,214	808,099
Total	89,475,317	89,954,315

Counterparty credit risk- weighted assets

	31.12.2024	31.12.2023
	VND million	VND million
Proprietary Trading	-	-
Repo and reverse repo	-	-
Derivatives for hedging purpose	-	-
Trading of foreign currency and financial assets to serve customers and partners as specified in Point D Clause 32 Article 2 of Circular 41.	148,874	144,068
Total	148,874	144,068

3. Risk-weighted assets by sector
Credit risk-weighted assets

	31.12.2024	31.12.2023
	VND million	VND million
Agriculture, forestry and aquatics	1,282,900	2,675,284
Industry and Construction	34,619,751	31,659,472
Trading and Services	28,084,690	24,543,760
Others (*)	25,487,976	31,075,799
Total	89,475,317	89,954,315

(*) consist of receivables from individual customers, financial institutions and other assets.

Counterparty credit risk-weighted assets

	31.12.2024	31.12.2023
	VND million	VND million
Agriculture, forestry and aquatics	-	848
Industry and Construction	23,005	23,468
Trading and Services	24,454	16,367
Others (**)	101,415	103,385
Total	148,874	144,068

(**) consist of receivables from financial institutions.

4. Risk-weighted assets before and after applying risk mitigation

	As at 31.12.2024		
	Risk weighted assets before risk mitigation	Credit risk mitigation by Collateral	Risk weighted assets after risk mitigation
	VND million	VND million	VND Million
On Balance sheet	73,520,478	1,363,847	72,544,250
Off Balance sheet	23,778,257	3,583,098	17,079,941
Total	97,298,735	4,946,945	89,624,191

	As at 31.12.2023		
	Risk weighted assets before risk mitigation	Credit risk mitigation by Collateral	Risk weighted assets after risk mitigation
	VND million	VND million	VND Million
On Balance sheet	72,970,158	1,129,198	72,092,529
Off Balance sheet	23,664,803	5,232,200	18,005,854
Total	96,634,961	6,361,398	90,098,383

III. OPERATIONAL RISK
A. Qualitative aspects
1. Operational Risk Management and Policies

Operational risk is the responsibility of all employees and business management, supported by the HSBC Group's Risk Management Framework (RMF). The RMF describes how HSBC Viet Nam manages both financial and non-financial risks across all departments of the Bank.

In order to manage Operational risks, HSBC Viet Nam applies the adoption of the Three Lines of Defence risk governance model:

- The First Line of Defence** owns the operational risks. They are responsible for identifying, recording, reporting and managing risks, and ensuring that the right controls and assessments are in place to mitigate these risks.

- 2) **The Second Line of Defence** sets policy and guidelines for managing operational risk, and provides advice and guidance on effective risk management. The Second Line are risk management specialists comprising Risk Stewards and the Operational Risk Function.
- 3) **The Third Line of Defence** is Internal Audit who independently ensure that HSBC is managing operational risk effectively.

Identifying and assessing Operational risks and controls is in accordance with the Operational Risk Functional Instruction Manual (FIM). HSBC Viet Nam uses 'HSBC Helios' for the management of Operational Risk.

The Risk and Control Assessment (RCA) process provides a forward-looking view of operational risk across all levels to help understand our risks and determine whether the material operational risks are controlled within acceptable levels. All relevant RCAs are recorded in Helios, the operational risk system. HSBC Viet Nam implements controls to mitigate Very High and High Inherent Risks, with continuous control monitoring and then, as part of the RCA process, assess Residual Risk after these controls.

Where a risk is deemed to be Inherently Very High or High, it requires a full RCA. The materiality of each risk is assessed to determine the maximum plausible impact on the business over the next 12 months and the residual risk, taking into consideration the extent to which the control environment effectively mitigates that risk.

The Local Materiality Criteria (LMC) has also been approved to support Risk Owners in identifying their Locally Significant Risks (LSR).

2. Business continuity plan

The Bank's business continuity plan is fully documented in HSBC's Business Continuity Management Policy & Procedure Manual. The plan is updated regularly and tested at least once a year.

The objectives of Business Continuity Management (BCM) are:

- to minimize the impact of any unplanned disruption to the Bank's operations and associated costs of recovery;
- to effect a prioritized recovery in the shortest timeframe possible following a disaster;
- to avoid duplicated effort by management and recovery personnel in the recovery process;
- to protect customer services, revenue generation and the integrity of data and documents.

BCM addresses the worst-case scenario involving the total loss of a facility and/or denial of access to a facility. The scope of the BCM program is for all business units, departments and branches; it also covers:

- Cyber-attack on computer systems
- Physical security of premises
- The loss of more than 1 main building
- Pandemic related business disruption (e.g. COVID-19).

B. Quantitative aspects
1. Business index

	31.12.2024	31.12.2023
	VND million	VND million
IC – Net interest and similar operation	6,243,305	7,965,479
SC – Total commission and fee incomes, Total commission and fee expenses, Other incomes, Other expenses	2,323,591	2,091,892
FC – Absolute Gains/losses from foreign currency trading, trading of trading securities and investment securities	1,015,434	788,994
BI – Business index	9,582,330	10,846,365

2. Minimum capital requirement for operational risk

	31.12.2024
	VND million
BI ₂₀₂₄ – Business index - Y2024	9,582,330
BI ₂₀₂₃ – Business index - Y2023	10,846,365
BI ₂₀₂₂ – Business index - Y2022	8,134,673
BI ₂₀₂₂₋₂₀₂₄ – Business index 2022-2024	9,521,123
Ratio	15%
Minimum capital requirement for operational risks	1,428,168

	31.12.2023
	VND million
BI ₂₀₂₃ – Business index - Y2023	10,846,365
BI ₂₀₂₂ – Business index - Y2022	8,134,673
BI ₂₀₂₁ – Business index - Y2021	5,055,991
BI ₂₀₂₁₋₂₀₂₃ – Business index 2020-2023	8,012,343
Ratio	15%
Minimum capital requirement for operational risks	1,201,851

IV. MARKET RISK**A. Qualitative aspects****1. Market Risk Management and Policies***(i) Definition*

Market risk incurs when there are adverse fluctuations of interest rate, exchange rate, gold price, stock price and commodities price on the market causing the losses to the Bank. Market risk includes interest rate risk, foreign exchange risk, Stock Price Risk and Commodity Price Risk.

In HSBC Viet Nam, there are two types of market risk: foreign exchange risk and interest rates risk.

- Foreign exchange risk is the risk incurs from market volatility of foreign exchange rate, gold price whilst the Bank maintains an opened foreign exchange position or gold position.
- Interest rate risk incurs when there is interest rates fluctuation in market, impacting to valuable papers (holding securities), financial instruments, interest rate derivatives in trading book of the Bank.

(ii) The Market Risk management procedures

HSBC Viet Nam has established the procedures for market risk management such as:

- Group market risk management policy
- Trading/banking book discrimination policy
- Limit setting and management framework
- Documentations for market risk methodology includes: sensitivity analysis, VaR framework (including stressed VaR and VaR back-testing) and stress testing.

(iii) Organizational structure

HSBC Viet Nam manages and controls risk using the Three Lines of Defense model. The model delineates management accountabilities and responsibilities in FIM for risk management and the control environment within each LOD, thereby creating a robust control environment to manage risks.

- First Line of Defense (“LOD”): Global Markets and Markets Treasury, Global Market Product Control, Market Middle Office_ Market risk data services (Offshore).
- Second LOD: Wholesale Credit and Market Risk Management, Traded Risk Management.
- Third LOD: Internal Audit

(iv) Market risk measures

Currently, HSBC Viet Nam is measuring market risk by Standardized Measurement Method (SMM), which is followed Circular 41 and its amendment, and report market risk capital charge on monthly basic. Moreover, HSBC Viet Nam already applied Internal Model

Approach which is applied whole Group and complied with Basel III and other international standards.

- Sensitivity Analysis is a technique to analyze the impact of the income or economic value of the financial instruments or investment portfolio that are influenced by the change of some underlying market risk factors.
- Value at risk (VaR) is a technique that estimates the potential losses on risk positions in the trading portfolio as a result of movements in market rates and prices over a specified time horizon and to a given level of confidence. Our models are predominantly based on historical simulation. VaR is calculated at a 99% confidence level for a one-day holding period rates and historical observation period of 500 days.
- Stressed VaR is a measure to assess market risk exposure of Trading Book in crisis period. In the general market VaR calculation, the sampled data is taken from the recent history.
- Back-testing: We validate daily the accuracy of our VaR models by back-testing them against both actual and hypothetical profit and loss. Hypothetical profit and loss excludes non-modelled items such as fees, commissions and revenues of intra-day transactions.
- Stress testing is a methodology to assess the potential impact of extreme market movements or crisis on Trading Book portfolio, which includes the impact on profitability and capital adequacy. The stress scenarios should cover the factors contributing to remarkable gains or losses in the Trading Book portfolios.

(v) Exposure monitoring and control:

- Market risk exposure is managed by limit framework which is established based on Risk appetite, market condition and business strategy. These limits are allocated to Entity level, trading desks, group of products, each products, each traders and trading intention.
- The limit structure is regulated on limit mandate and summarized as bellow:

Whole bank limits	- VaR - Stressed VaR - Daily/monthly/yearly maximum loss limit
Foreign exchange risk limits	- VaR - Stressed VaR - Net short position limit - Daily/monthly/yearly maximum loss limit
Interest rate limits	- VaR - Stressed VaR - PVBP limit - Daily/monthly/yearly maximum loss limit

(vi) Risk reporting

HSBC Viet Nam has established the internal report system for market risk with daily, monthly, quarterly, half-year, yearly and ad-hoc reports. These reports also have been defined by target audiences. The content of market risk report includes:

- Market risk exposures
- Market risk limit, limit utilization and excess
- VaR, Stressed Var and Stress Testing

- Profit and loss from GM
- And others as requested.

2. Proprietary trade strategy

HSBC Viet Nam doesn't perform proprietary trade in the year ended 31 December 2024.

3. Trading book category

Category	Product Name
Trading book	
Bond/Bill	VND Government Treasury Notes/Bills/Bonds
Interest Swaps	USD IRS
Cross Currency Swaps	USDVND CSW (onshore)
Loans and deposits (internal)	Loans and deposits (internal)
FX	Spot
FX	Forward and Swap
Swap	FX funding swap
Back-to-Back	
Back-to-Back Interest Rate Swaps	Major currencies (non-VND)
Back-to-Back bonds for 20 years	VND government bonds

B. Quantitative aspects

Capital requirement for market risks

	As at 31.12.2024	
	Market risk-weighted assets	Minimum capital requirement for market risk
	VND million	VND Million
Interest rate risk	-	-
Stock price risk	-	-
Foreign exchange risk	-	-
Commodity price risk	-	-
Option transactions	-	-
Total	-	-

There is no capital requirement for market risk at year end 2024 due to:

- There is no outstanding bond trading, commodity price trading, stock, currency swap and option transactions which underlying assets is a financial instrument under interest rate risk, stock price risk, foreign exchange risk, commodity price risk at year end.
- FX position as at 31 December 2024 is below 2% of the bank's capital base.

Capital requirement for market risks

	As at 31.12.2023	
	Market risk- weighted assets VND million	Minimum capital requirement for market risk VND Million
Interest rate risk	111,563	8,925
Stock price risk	-	-
Foreign exchange risk	-	-
Commodity price risk	-	-
Option transactions	-	-
Total	111,563	8,925

