

10 November 2022

Suncorp Bank APS330 30 September 2022

Suncorp (ASX: SUN | ADR: SNMCY) today released its Bank quarterly update as at 30 September 2022 as required under the Australian Prudential Standard 330. The report is attached.

Authorised for lodgement with the ASX by the Suncorp Audit Committee.

ENDS

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Suncorp Group Limited

ABN 66 145 290 124

Suncorp Bank APS 330: Quarter ended
30 September 2022

10 November 2022

Basis of Preparation

This document has been prepared by Suncorp Bank to meet the disclosure obligations under the Australian Prudential Regulation Authority (APRA) Australian Prudential Standard (APS) 330 *Public Disclosure*.

Suncorp Bank is represented by Suncorp-Metway Limited (SML) and its subsidiaries. SML is an authorised deposit-taking institution (ADI) and a wholly owned subsidiary of Suncorp Group Limited. Suncorp Group is represented by Suncorp Group Limited and its subsidiaries.

Other than statutory information required by a regulator (including APRA), all financial information is measured in accordance with Australian Accounting Standards. All figures have been quoted in Australian dollars and have been rounded to the nearest million.

This document has not been audited nor reviewed in accordance with Australian Auditing Standards. It should be read in conjunction with Suncorp Group and SML's consolidated annual and interim financial reports which have been either audited or reviewed in accordance with Australian Auditing Standards.

Figures relate to the quarter ended 30 September 2022 (unless otherwise stated) and should be read in conjunction with other information concerning Suncorp Group filed with the Australian Securities Exchange (ASX).

Disclaimer

This report contains general information which is current as at 10 November 2022. It is information given in summary form and does not purport to be complete.

It is not a recommendation or advice in relation to the Suncorp Group and Suncorp Bank or any product or service offered by its entities, or intended to be relied upon as advice.

The information in this report is for general information only. To the extent that the information may constitute forward-looking statements, the information reflects Suncorp Group's intent, belief or current expectations with respect to our business and operations, market conditions, results of operations and financial condition, capital adequacy, specific provisions and risk management practices at the date of this report and undertakes no obligation to update any forward-looking statements. Such forward-looking statements are not guarantees of future performance and involve known and unknown risks and uncertainties, many of which are beyond Suncorp Group's control, which may cause actual results to differ materially from those expressed or implied.

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Overview

Suncorp Bank's home lending portfolio maintained its growth momentum through the September quarter, increasing by \$1,657 million or 3.3% (13.1% annualised). The continued growth was driven by competitive offerings, lower turnaround times and strong conversion rates. In September 2022, the Bank delivered above system growth for the eighth consecutive month, supported by a positive net refinance rate and continued delivery of the targeted program of work to improve customer and broker experiences. The volume of new applications reduced in the quarter reflecting slower market conditions. The Bank maintains a high-quality and conservatively positioned home lending portfolio, weighted towards owner occupiers, on principal and interest repayment terms and loans with a loan-to-valuation ratio (LVR) below 80%.

Business lending grew \$35 million or 0.3% (1.2% annualised). Commercial lending growth of \$114 million was driven by new customer lending, including several large deals in Queensland Metro, supported by a moderation in external refinancing. Small and medium enterprise (SME) growth of \$12 million was assisted by increased application volumes and settlements. The Agribusiness portfolio contracted by \$91 million, driven by heightened external refinances early in the quarter, partially offset by strong disbursements.

Household deposit growth for the quarter was in line with strong system growth levels. The Bank continues to prioritise portfolio margin in favour of market share growth and the portfolio is strategically managed within funding requirements. We continue to grow savings account balances (22.4% annualised), as well as higher margin retail term deposits (19.4% annualised) as customers become increasingly responsive to higher interest products. The transaction portfolio grew 5.3% (annualised).

The Bank has continued to focus on increasing its digital enablement and capabilities. The number of digitally active Bank customers increased 7.3% (annualised) through the quarter. At 30 September 2022, 44.1% of personal customers were using the Suncorp app, up from 43.2% at 30 June 2022.

A net impairment expense of \$0 million for the quarter reflects an unchanged collective provision, minimal write-offs, and a small specific provision release across several home and business lending customers.

Gross impaired assets decreased \$32 million over the quarter to \$106 million or 17 basis points of gross loans and advances (GLA). This was driven by a \$35 million reduction in gross impaired commercial lending mainly attributable to two large customers no longer impaired, supported by asset sales for one and improved operating conditions for the other. Additionally, there was a \$3 million reduction in gross impaired home lending which was underpinned by the strong housing market supporting asset sales by borrowers, coupled with strong clearance rates for properties brought to auction.

Total past due loans not impaired decreased \$44 million over the quarter to \$283 million or 44 basis points of GLA. This was driven by a \$33 million decrease within the home lending portfolio, attributable to the strong housing market resulting in increased voluntary borrower sales and customers exiting hardship.

As at 30 September 2022, the Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) were 131% and 135% respectively, demonstrating the continued strength of Suncorp's funding and liquidity position. The Bank's Committed Liquidity Facility (CLF) limit is currently \$0.5 billion and will reduce to nil in December 2022.

The Bank's capital levels remain sound, with a Common Equity Tier 1 ratio of 9.12% (June 2022: 9.06%), within the target operating range of 9.00% to 9.50%. The increase in the quarter reflected increased profit offset by growth in credit risk-weighted assets and an increase in regulatory deductions.

Loans and advances

	Sep-22 \$M	Jun-22 \$M	Sep-21 \$M	Sep-22 vs Jun-22 %	Sep-22 vs Sep-21 %
Housing loans - term	45,953	44,838	41,381	2.5	11.0
Housing line of credit	690	778	955	(11.3)	(27.7)
Securitised housing loans and covered bonds	5,228	4,598	4,181	13.7	25.0
Total housing loans	51,871	50,214	46,517	3.3	11.5
Personal loans	58	67	104	(13.4)	(44.2)
Retail loans	51,929	50,281	46,621	3.3	11.4
SME ⁽¹⁾	2,653	2,641	2,712	0.5	(2.2)
Commercial ⁽¹⁾	4,998	4,884	4,355	2.3	14.8
Agribusiness	4,176	4,267	4,243	(2.1)	(1.6)
Total Business loans	11,827	11,792	11,310	0.3	4.6
Total lending	63,756	62,073	57,931	2.7	10.1
Provision for impairment	(212)	(217)	(237)	(2.3)	(10.5)
Total loans and advances	63,544	61,856	57,694	2.7	10.1
Credit risk-weighted assets⁽²⁾	29,853	29,162	27,799	2.4	7.4
Geographical breakdown - Total lending					
Queensland	29,592	29,195	28,046	1.4	5.5
New South Wales	17,853	17,388	15,912	2.7	12.2
Victoria	9,031	8,516	7,517	6.0	20.1
Western Australia	4,190	4,048	3,729	3.5	12.4
South Australia and other	3,090	2,926	2,727	5.6	13.3
Outside of Queensland loans	34,164	32,878	29,885	3.9	14.3
Total lending	63,756	62,073	57,931	2.7	10.1

⁽¹⁾ Commercial and SME balances for September 2021 have been split and restated.

⁽²⁾ Comparative for June 2022 credit risk-weighted assets has been restated.

Impairment losses on loans and advances

	Quarter Ended			Sep-22	Sep-22
	Sep-22	Jun-22	Sep-21	vs Jun-22	vs Sep-21
	\$M	\$M	\$M	%	%
Collective provision for impairment	-	-	-	n/a	n/a
Specific provision for impairment	1	-	1	n/a	-
Actual net write-offs	(1)	(1)	-	-	n/a
Impairment releases/(losses)	-	(1)	1	(100.0)	100.0
Impairment releases/(losses) to gross loans and advances	0.00%	(0.00%)	0.00%		

Impaired assets and non-performing loans

	Quarter Ended			Sep-22	Sep-22
	Sep-22	Jun-22	Sep-21	vs Jun-22	vs Sep-21
	\$M	\$M	\$M	%	%
Gross balances of individually impaired loans					
Retail lending	37	40	40	(7.5)	(7.5)
Agribusiness lending	15	7	24	114.3	(37.5)
Commercial lending ⁽¹⁾	42	77	87	(45.5)	(51.7)
SME lending ⁽¹⁾	12	14	18	(14.3)	(33.3)
Gross impaired assets	106	138	169	(23.2)	(37.3)
Impairment provision	(34)	(46)	(55)	(26.1)	(38.2)
Net impaired assets	72	92	114	(21.7)	(36.8)
Impairment provisions as a percentage of gross impaired assets	32%	33%	33%		
Size of gross individually impaired assets					
Less than one million	30	33	35	(9.1)	(14.3)
Greater than one million but less than ten million	52	61	95	(14.8)	(45.3)
Greater than ten million	24	44	39	(45.5)	(38.5)
Gross impaired assets	106	138	169	(23.2)	(37.3)
Past due loans not shown as impaired assets	283	327	451	(13.5)	(37.3)
Gross non-performing loans⁽²⁾	389	465	620	(16.3)	(37.3)
Analysis of movements in gross individually impaired assets					
Balance at the beginning of the period	138	154	180	(10.4)	(23.3)
Recognition of new impaired assets	14	6	7	133.3	100.0
Other movements in impaired assets ⁽³⁾	(3)	-	1	n/a	(400.0)
Impaired assets which have been reclassified as performing assets or repaid	(43)	(22)	(19)	95.5	126.3
Balance at the end of the period	106	138	169	(23.2)	(37.3)

⁽¹⁾ SME has been separated out from Commercial. September 2021 balances restated.

⁽²⁾ Gross non-performing loans in the above table excludes loans that meet additional requirements under the revised APS 220 *Credit Risk Management*.

⁽³⁾ Net of increases in previously recognised impaired assets and impaired assets written off.

Provision for impairment

	Sep-22 \$M	Jun-22 \$M	Sep-21 \$M	Sep-22 vs Jun-22 %	Sep-22 vs Sep-21 %
Collective provision					
Balance at the beginning of the period	180	180	195	-	(7.7)
(Release)/charge against impairment losses	-	-	-	n/a	n/a
Balance at the end of the period	180	180	195	-	(7.7)
Specific provision					
Balance at the beginning of the period	37	38	44	(2.6)	(15.9)
(Release)/charge against impairment losses	(1)	-	(1)	n/a	-
Impairment provision written off ⁽¹⁾	(4)	(1)	(1)	300.0	300.0
Balance at the end of the period	32	37	42	(13.5)	(23.8)
Total provision for impairment - Banking activities	212	217	237	(2.3)	(10.5)
Provision for impairment expressed as a percentage of gross loans and advances are as follows:	%	%	%		
Collective provision	0.28	0.29	0.34		
Specific provision	0.05	0.06	0.07		
Total provision coverage	0.33	0.35	0.41		

⁽¹⁾ Includes other items such as unwind of discount.

Gross non-performing loans coverage by portfolio

	Sep-22 \$M	Jun-22 \$M	Sep-21 \$M	Sep-22 vs Jun-22 %	Sep-22 vs Sep-21 %
Retail Lending					
Past due loans	231	264	383	(12.5)	(39.7)
Impaired assets	37	40	40	(7.5)	(7.5)
Specific provision	8	8	7	-	14.3
Collective provision	7	7	13	-	(46.2)
Total provision coverage⁽¹⁾	5.6%	4.9%	4.7%	0.7	0.9
Agribusiness Lending					
Past due loans	30	33	30	(9.1)	-
Impaired assets	15	7	24	114.3	(37.5)
Specific provision	2	1	5	100.0	(60.0)
Collective provision	5	5	7	-	(28.6)
Total provision coverage⁽¹⁾	15.6%	15.0%	22.2%	0.6	(6.7)
Commercial Lending⁽²⁾					
Past due loans	7	18	16	(61.1)	(56.3)
Impaired assets	42	77	87	(45.5)	(51.7)
Specific provision	18	21	21	(14.3)	(14.3)
Collective provision	8	13	18	(38.5)	(55.6)
Total provision coverage⁽¹⁾	53.1%	35.8%	37.9%	17.3	15.2
SME Lending⁽²⁾					
Past due loans	15	12	22	25.0	(31.8)
Impaired assets	12	14	18	(14.3)	(33.3)
Specific provision	4	7	9	(42.9)	(55.6)
Collective provision	2	3	11	(33.3)	(81.8)
Total provision coverage⁽¹⁾	22.2%	38.5%	50.0%	(16.2)	(27.8)

⁽¹⁾ Calculated as: (Specific provision + Collective provision Stage 3) / (Past due loans + Impaired assets).

⁽²⁾ SME has been separated out from Commercial. September 2021 balances restated.

Appendix 1 – APS 330 Tables

- Table 1: Capital disclosure template – not applicable for this reporting period. This table was disclosed in the June 2022 reporting period.
- Table 2: Main features of capital instruments
- Table 3: Capital adequacy
- Table 4: Credit risk
- Table 5: Securitisation exposures
- Table 20: Liquidity Coverage Ratio Disclosure
- Table 22: Remuneration Disclosures

Table 2: Main Features of Capital Instruments

Attachment B of Prudential Standard APS 330 details the continuous disclosure requirements for the main features of all capital instruments included in Suncorp Bank's regulatory capital.

The Suncorp Group's main features of capital instruments are updated on an ongoing basis and are available at <https://www.suncorpgroup.com.au/investors/regulatory-disclosures-current>.

The full terms and conditions of all of Suncorp Group's regulatory capital instruments are available at <https://www.suncorpgroup.com.au/investors/securities>¹.

¹ The published full terms and conditions represent the comparable capital instruments issued by Suncorp Group Limited to external investors. The terms of these instruments may differ slightly to those instruments issued by the regulatory Level 2 group.

Table 4: Credit Risk

Table 4A: Credit risk by gross credit exposure

Exposure Type	Gross Credit Exposure ⁽⁶⁾		Average Gross Credit Exposure ⁽⁶⁾	
	Sep-22 \$M	Jun-22 \$M	Sep-22 \$M	Jun-22 \$M
Receivables due from other Banks ⁽²⁾	4,651	2,490	3,571	3,250
Trading Securities	1,801	2,722	2,262	2,758
Derivatives ⁽³⁾	101	128	115	117
Investment Securities	4,724	5,485	5,104	5,281
Loans and Advances	61,586	59,733	60,663	58,755
Off-balance sheet exposures ⁽³⁾	3,171	3,631	3,400	3,450
Total gross credit risk⁽⁴⁾	76,034	74,189	75,115	73,611
Securitisation exposures ⁽¹⁾	2,584	2,875	2,730	2,647
Total including securitisation exposures	78,618	77,064	77,845	76,258
Impairment provision	(212)	(217)	(215)	(218)
Total	78,406	76,847	77,630	76,040

Portfolios Subject to the Standardised Approach	Gross Credit Exposure ⁽⁶⁾		Average Gross Credit Exposure ⁽⁶⁾	
	Sep-22 \$M	Jun-22 \$M	Sep-22 \$M	Jun-22 \$M
Claims secured against eligible residential mortgages	52,188	50,871	51,530	49,922
Other retail assets	58	67	63	73
Banks and other ADIs	5,280	3,062	4,172	3,835
Government and public authorities	6,311	8,091	7,201	7,899
Corporate and other claims ⁽⁵⁾	12,197	12,098	12,149	11,882
Total gross credit risk⁽⁴⁾	76,034	74,189	75,115	73,611
Securitisation exposures ⁽¹⁾	2,584	2,875	2,730	2,647
Total including securitisation exposures	78,618	77,064	77,845	76,258
Impairment provision	(212)	(217)	(215)	(218)
Total	78,406	76,847	77,630	76,040

Notes:

⁽¹⁾ Securitisation exposures for September 2022 include \$2,170 million in Loans and advances, \$362 million in Investment Securities, \$16 million in Derivatives and \$36 million in Off-balance sheet exposures. The securitisation exposures for Loans and advances qualify for regulatory capital relief under APS 120 *Securitisation* and therefore do not contribute to the Bank's total gross credit risk. The remaining securitisation exposures carry credit risk commensurate with their respective asset classes in accordance with APS 120 *Securitisation*.

⁽²⁾ Receivables due from other Banks include collateral deposits provided to derivative counterparties.

⁽³⁾ Off-balance sheet exposures represent the credit equivalent amount in accordance with APS 112 *Capital Adequacy: Standardised Approach to Credit Risk*.

⁽⁴⁾ Total credit risk excludes cash and cash equivalents, including any reverse repurchase agreements held by the ADI.

⁽⁵⁾ Includes a portion of small business loans, with limits below \$1 million, that are not classified.

⁽⁶⁾ Gross credit exposures and Average gross credit exposures reflect on balance sheet exposures and credit equivalent amounts for off balance sheet exposures.

Table 4: Credit Risk (Continued)

Table 4B: Credit risk by portfolio

Portfolios Subject to the Standardised Approach	Gross Impaired Assets	Past due not impaired > 90 days	Specific Provisions ⁽¹⁾	Charges for Specific Provisions & Write Offs
	Sep-22 \$M	Sep-22 \$M	Sep-22 \$M	Sep-22 \$M
Claims secured against eligible residential mortgages	36	215	8	-
Other retail assets	-	4	-	-
Banks and other ADIs	-	-	-	-
Government and public authorities	-	-	-	-
Corporate and other claims ⁽²⁾	69	52	24	-
Total gross credit risk	105	271	32	-
Securitisation exposures	1	12	-	-
Total including securitisation exposures	106	283	32	-
Impairment provision	(34)	(10)	-	-
Total	72	273	32	-

⁽¹⁾ The specific provisions of \$32 million represents the specific provisions for accounting purposes. It excludes the ineligible collective provisions of \$49 million which in accordance with APS 220 *Credit Risk Management* are regulatory specific provisions. The regulatory specific provisions under APS 220 *Credit Risk Management* are \$81 million.

⁽²⁾ Includes SME lending defined as all lending up to up to \$3m Total Business-Related Exposure (TBRE) from the SME Commercial CRMF ANZSIC segment. Also includes a portion of small business loans, with limits below \$1 million, that are not classified.

Portfolios Subject to the Standardised Approach	Gross Impaired Assets	Past due not impaired > 90 days	Specific Provisions ⁽¹⁾	Charges for Specific Provisions & Write Offs
	Jun-22 \$M	Jun-22 \$M	Jun-22 \$M	Jun-22 \$M
Claims secured against eligible residential mortgages	39	247	8	-
Other retail assets	-	4	-	(1)
Banks and other ADIs	-	-	-	-
Government and public authorities	-	-	-	-
Corporate and other claims ⁽²⁾	98	63	29	-
Total gross credit risk	137	314	37	(1)
Securitisation exposures	1	13	-	-
Total including securitisation exposures	138	327	37	-
Impairment provision	(46)	(10)	-	-
Total	92	317	37	-

⁽¹⁾ The specific provisions of \$37 million represents the specific provisions for accounting purposes. It excludes the ineligible collective provisions of \$54 million which in accordance with APS 220 *Credit Risk Management* are regulatory specific provisions. The regulatory specific provisions under APS 220 *Credit Risk Management* are \$91 million.

⁽²⁾ Includes SME lending defined as all lending up to up to \$3 million Total Business-Related Exposure (TBRE) from the SME Commercial CRMF ANZSIC segment. Also includes a portion of small business loans, with limits below \$1 million, that are not classified.

Table 4: Credit Risk (Continued)

Table 4C: General reserve for credit losses

	Sep-22 \$M	Jun-22 \$M
Collective provision for impairment	180	180
Ineligible collective provisions	(49)	(54)
Eligible collective provisions	131	126
General equity reserve ⁽¹⁾	76	76
General reserve for credit losses⁽²⁾	207	202

⁽¹⁾ Following removal of the ERCL (equity reserve for credit losses) requirement in APS 220 *Credit Risk Management* from 1 January 2022, the general equity reserve has been established in its place. The general equity reserve will be maintained at this level (\$76 million) pending further consideration of its future treatment.

⁽²⁾ The general reserve for credit losses amount represents the amount of provisions held against non-defaulted exposures that represent a purely forward-looking amount for future losses that are presently unidentified, per APS 111 *Capital Adequacy: Measurement of Capital*.

Table 5: Securitisation Exposures

Table 5A: Summary of securitisation activity for the period

During the quarter ending 30 September 2022, there was no new securitisation activity undertaken (quarter ending 30 June 2022: Apollo Series 2022-1 Trust (Apollo 25) was established).

	Exposures Securitised		Recognised Gain or (Loss) on Sale	
	Sep-22	Jun-22	Sep-22	Jun-22
	\$M	\$M	\$M	\$M
Residential mortgages	-	850	-	-
Total exposures securitised during the period	-	850	-	-

Table 5B(i): Aggregate of on-balance sheet securitisation exposures by exposure type

Exposure type	Sep-22	Jun-22
	\$M	\$M
Debt securities	362	464
Total on-balance sheet securitisation exposures	362	464

Table 5B(ii): Aggregate of off-balance sheet securitisation exposures by exposure type

Exposure type	Sep-22	Jun-22
	\$M	\$M
Liquidity facilities	36	39
Derivative exposures	16	32
Total off-balance sheet securitisation exposures	52	71

Table 20: Liquidity Coverage Ratio Disclosure

	Total Unweighted Value (Average) Sep-22 \$M	Total Weighted Value (Average) Sep-22 \$M	Total Unweighted Value (Average) Jun-22 \$M	Total Weighted Value (Average) Jun-22 \$M	Total Unweighted Value (Average) Mar-22 \$M	Total Weighted Value (Average) Mar-22 \$M
Liquid assets, of which:						
High-quality liquid assets (HQLA)		11,933		10,809		10,066
Alternative liquid assets (ALA)		591		897		1,235
Cash outflows						
Retail deposits and deposits from small business customers, of which:	35,298	3,444	34,811	3,380	34,676	3,383
<i>stable deposits</i>	22,044	1,102	21,630	1,081	21,335	1,067
<i>less stable deposits</i>	13,254	2,342	13,181	2,299	13,341	2,316
Unsecured wholesale funding, of which:	5,739	3,985	4,726	3,134	4,548	2,949
<i>operational deposits (all counterparties) and deposits in networks for cooperative banks</i>	-	-	-	-	-	-
<i>non-operational deposits (all counterparties)</i>	3,610	1,856	3,340	1,748	3,326	1,727
<i>unsecured debt</i>	2,129	2,129	1,386	1,386	1,222	1,222
Secured wholesale funding		65		68		45
Additional requirements, of which:	10,122	1,561	9,723	1,555	9,331	1,348
<i>outflows related to derivatives exposures and other collateral requirements</i>	1,104	1,104	1,120	1,120	920	920
<i>outflows related to loss of funding on debt products</i>	-	-	-	-	-	-
<i>credit and liquidity facilities</i>	9,018	457	8,603	435	8,411	428
Other contractual funding obligations	1,470	1,141	1,414	1,125	1,066	749
Other contingent funding obligations	6,137	626	6,162	525	5,518	552
Total cash outflows		10,822		9,787		9,026
Cash inflows						
Secured lending (e.g. reverse repos)	675	-	57	-	-	-
Inflows from fully performing exposures	686	357	608	318	663	347
Other cash inflows	878	878	791	791	753	753
Total cash inflows	2,239	1,235	1,456	1,109	1,416	1,100
		Total Adjusted Value		Total Adjusted Value		Total Adjusted Value
Total liquid assets		12,524		11,706		11,301
Total net cash outflows		9,587		8,678		7,926
Liquidity Coverage Ratio (%)		131		135		143
Number of data points used		65		62		62

The Liquidity Coverage Ratio (**LCR**) promotes shorter-term resilience by requiring ADIs to maintain sufficient qualifying High Quality Liquid Assets (**HQLA**) to meet expected net cash outflows (**NCO**) under an APRA prescribed 30 calendar day stress scenario. SML manages its LCR on a daily basis and maintains a buffer over the regulatory minimum of 100%.

The amount of liquid assets held considers the amount needed to meet prudential and internal requirements (including a variety of internal stress scenarios as part of the risk management framework) and a suitable buffer reflecting management's preference.

Liquid assets included in the LCR comprise HQLA (cash, Australian Semi-Government and Commonwealth Government securities) and alternative liquid assets covered by the Committed Liquidity Facility (**CLF**) with the Reserve Bank of Australia (**RBA**). SML received approval from APRA to reduce the CLF from \$3.9 billion to \$1.5 billion which became effective on 1 December 2021. SML will reduce its CLF to zero by 1 January 2023 in equal sized reductions in line with APRA's guidance.

The daily average LCR was 131% over the September 2022 quarter compared to an average of 135% over the June 2022 quarter, partly driven by the CLF decrease over the September quarter as previously mentioned. The reduction in the CLF and introduction of the regulatory HQLA to NCO minimum meant that SML has been required to raise funding to increase HQLA throughout the calendar year. SML continues to increase holdings of HQLA in preparation for final reduction of the CLF.

Table 22: Remuneration Disclosures as at 30 June 2022

Introduction

This Remuneration Disclosure has been prepared in accordance with the Australian Prudential Regulation Authority (APRA) Prudential Standard (APS) 330: Public Disclosure.

This disclosure explains the Suncorp Group Limited (**Suncorp**) Remuneration Policy and structure, which have been endorsed by the Suncorp Board People and Remuneration Committee (**People and Remuneration Committee**) and approved by the Suncorp Group Limited Board (**Board**). Suncorp's remuneration framework and associated remuneration governance applies to all employees of Suncorp Bank. Suncorp Bank is a core unit of Suncorp and is represented by the legal entity Suncorp-Metway Limited (**SML**) and its subsidiaries. SML is an authorised deposit-taking institution and a wholly owned subsidiary of Suncorp. Accordingly, this Remuneration Disclosure is completed on a Level 2 basis¹.

For the purposes of this disclosure:

- Senior Managers are defined as Responsible Persons included in the Group's Fit and Proper Policy. This includes:
 - Key Management Personnel (**KMP**) for the Group that are also KMP for SML and its subsidiaries (where KMP refers to the Group CEO and Senior Executives); and
 - Other Senior Managers. These include select Executive General Managers (**EGMs**) and employees below EGM level who are Responsible Persons for SML.
- Material Risk Takers (**MRT**) are select employees below EGM level that are not Responsible Persons who may be able to individually or collectively affect the financial soundness of the business where the incumbents have a performance-based incentive target of a significant portion of total remuneration (being more than 40% of fixed pay).

The aggregated remuneration data is for Senior Managers (KMP), Other Senior Managers, and MRTs relating to Suncorp Bank during the financial year ended 30 June 2022 (**FY22**).

Section 1

Remuneration governance framework

The People and Remuneration Committee recommends Suncorp's people and remuneration framework and practices to the Board for approval. It assists the Board in fulfilling its responsibilities by ensuring that frameworks are in place that enable Suncorp to attract, retain and motivate talented employees to achieve our strategic objectives.

The People and Remuneration Committee receives input from the Risk Committee, Audit Committee, external advisors and management as illustrated below.

¹ Under Application Paragraph 3, 'where a locally incorporated ADI is a subsidiary of an authorised non-operating holding company (authorised NOHC), the authorised NOHC must ensure that the requirements under this Prudential Standard are met on a Level 2 basis' (APS 330, July 2018).

Board	<p>← People and Remuneration Committee</p> <p>The People and Remuneration Committee members as at 30 June 2022 are:</p> <p>Chairman Sylvia Falzon</p> <p>Members Elmer Funke Kupper Simon Machell</p> <p>Ex-officio member Christine McLoughlin, AM</p> <p>The People and Remuneration Committee’s responsibilities are outlined in its charter available at suncorpgroup.com.au/about/corporate-governance. The People and Remuneration Committee held five meetings during FY22.</p>	<p>← External advisers</p> <p>Provide independent advice, as needed, to the People and Remuneration Committee.</p> <p>No remuneration recommendations were made by a remuneration consultant during FY22.</p>
		<p>← Chairmen of Risk Committee, Audit Committee and People and Remuneration Committee</p> <p>Recommends the release, reduction, lapse or clawback of deferred incentives for the Group CEO and Senior Executives. This recommendation is made having regard to a report that is prepared by the Group Executive People, Culture and Advocacy as Chairman of the Remuneration Oversight Committee.¹</p>
		<p>← Management</p> <p>Advises the People and Remuneration Committee based on specialist expertise and business knowledge.</p>

1. The Remuneration Oversight Committee is a management committee.

The FY22 fee for the People and Remuneration Committee Chairman was \$66,000 and Member fees were \$33,000 (including superannuation). There were no fee increases in either FY22 or FY23.

All remuneration arrangements for Senior Managers and MRT roles require approval by the Board. Within pre-defined parameters, delegated authority has been granted by the Board to the Group CEO to approve remuneration for Other Senior Managers and MRT roles that are EGM level or below. The Board has oversight and reviews the remuneration arrangements of all KMP, Other Senior Managers and MRT roles on an annual basis.

FY22 Remuneration Policy and Framework

The Suncorp Remuneration Policy provides a governance framework for the structure and operation of remuneration plans within the context of Suncorp’s strategy, long-term financial soundness and risk management framework.

The remuneration framework, which is aligned to the business strategy and risk tolerance, ensures that incentives are paid based on achieving performance goals while demonstrating appropriate behaviours. The below table summarises Suncorp’s FY22 remuneration framework.

Our Purpose

Building futures and protecting what matters

Our Being @ Suncorp behaviours



Doing the right thing



Caring for others



Being courageous

Our reward principles

Reward simply and fairly

Align to our strategy

Encourage our employees to always do the right thing

Drive ownership and accountability

Embrace risk management

Our remuneration structure

Fixed pay

- Consists of base salary, superannuation and any salary sacrificed benefits.
- Reflects the role scope and individual's skills and experiences and is set in the context of market remuneration levels.
- Reviewed against internal relativity and relevant matches from Suncorp's peer group and/or with regard to other relevant factors.

Short-term incentives (STI)

- Delivered as a mix of cash (50% of Fixed Pay for Group CEO, 65% of Fixed Pay for other KMP, 70% of Fixed Pay for Other Senior Managers who are EGMs) with the remainder delivered as share rights.
- Share rights are deferred for a 1-2 year period for the KMP and over a 1-3 year period for EGMs.
- For Other Senior Managers and MRTs below EGM level, STI is delivered 100% in cash unless a threshold is exceeded, where a portion is deferred over one year and paid in cash.
- KMP, Other Senior Managers and MRT are assessed against a Function or individual scorecard comprising Financial, Customer, Risk, and People & Culture measures.
- The FY22 Group Scorecard determines the overall size of the Group STI pool and is shown below:

Category	Performance measure	Weighting
Financial	Adjusted Net Profit After Tax	30%
	Cash Return on Tangible Equity (Cash RoTE)	10%
	Market Share Growth (Insurance (Australia) - including customer retention, Suncorp NZ, and Home Lending)	10%
Customer	Consumer Brand NPS - AAMI	20%
	Consumer (Main Financial Institution, MFI) Brand NPS - Suncorp Bank Digital Sales and Service	
Risk	Risk Management and Compliance Measures	15%
People and Culture	Employee Engagement	15%
	Gender Pay Gap	
	Workforce of the Future	

- An STI gateway and modifier linked to the Code of Conduct applies which can reduce STI outcomes (down to nil).

Long-term incentives (LTI)

- Only KMP are eligible to participate in the LTI plan.¹
- Delivered as performance rights which vest over a three-year period.
- The performance measures are below and are weighted one-third each:
 - Relative Total Shareholder Return (TSR) against the 50 largest S&P/ ASX 100 companies excluding real estate investment trusts and resources companies.
 - Relative TSR against 12 ASX 100 financial organisations with banking and/or insurance operations.
 - Cash RoTE.
- For vesting to occur
 - Suncorp's TSR must be at least at the median of the peer group for the minimum 50% vesting to occur. Full vesting occurs at the 75th percentile and there is pro-rata vesting between these points.
 - Cash RoTE is based on the 3-year straight average of FY22-FY24. Cash RoTE must be at least 13.5% for the minimum 50% vesting to occur. Full vesting occurs where Cash RoTE is 15.5% and there is pro-rata vesting between these points.
- Performance is tested over a three-year period from 1 July 2021 - 30 June 2024.
- A further one-year deferral period applies on any vested rights, taking the total deferral period to four years.

All variable pay is subject to malus and clawback criteria

¹ EGMs, Other Senior Managers and MRTs do not participate in the LTI plan.

Suncorp Bank Function Scorecard

The FY22 Suncorp Bank Function Scorecard measures are below. These are assessed at the Suncorp Bank level unless otherwise indicated.

Category	Performance measure	Weighting
Financial	Adjusted NPAT	40%
	Budgeted costs	
	Market Share Growth (Home Lending, Business Lending and MFI customers)	
	Digital Sales Mix %	
	Suncorp Bank Cost to Income %	
Customer	Consumer MFI Brand NPS	20%
	Product NPS (Home Lending)	
	Broker NPS	
	Digital Users	
Risk	Risk Management and Compliance Measures	20%
	Risk Maturity Model	
	Net Stable Funding Ratio	
People & Culture	Employee Engagement	20%
	Gender Pay Gap	
	% Female Senior Leaders	
	Workforce of the Future	

The Suncorp Bank Function Scorecard is cascaded as appropriate to the Suncorp Bank Leadership Team and to employees within Suncorp Bank.

Modifications to the FY21 and FY22 LTI plan

In light of the announced sale of Suncorp Bank, modifications were made to the operation of the FY21 and FY22 LTI plan. These modifications considered the disruption and uncertainty caused by the transition during a time when there is an extremely competitive environment for talent, as well as the impact of the sale on the LTI performance measures.

The key modifications, which were approved by shareholders at the Suncorp 2022 AGM, are:

- The Board tested performance as at 30 June 2022 and then waived the performance measures on any FY21 and FY22 rights that met the performance measure at this date.
- A further one-year service condition was also imposed on these rights to further incentivise continuity of employment.
- Any rights that did not meet the performance measures as at 30 June 2022 lapsed.

As a result of these modifications, 40.1% of the FY21 rights remain on-foot and are subject to forfeiture until 30 June 2024 and 55.5% of the FY22 rights remain on-foot and are subject to forfeiture until 30 June 2025.

Further information can be found in Suncorp's 2022 Remuneration Report.

Changes to the FY23 LTI plan

Given the impact of the announced sale of Suncorp Bank on Suncorp's earnings and equity, and in light of the modifications that were made to the FY21 and FY22 LTI plan, the Board approved changes to the FY23 LTI performance measures. The FY23 LTI performance measures are:

- Relative TSR against a broad-based peer group, being all companies in the S&P / ASX 100 index at the beginning of the performance period (50% weighting)
- Relative TSR against a customised peer group, being all S&P / ASX 100 financial organisations that are domiciled in Australia at the beginning of the performance period (50% weighting).

Further information can be found in Suncorp's Notice of 2022 Annual General Meeting.

Remuneration alignment with risk management

Suncorp is committed to effective risk management throughout the Group, with risk management considering both financial and non-financial risks.

The Non-Financial Risk Committee, made up of the KMP, supports the identification, assessment, monitoring, and mitigation of non-financial risks. This governance structure ensures that relevant non-financial risks, including conduct risks, receive appropriate focus.

The Enterprise Risk Management Framework (ERMF) lays the foundation for all Suncorp's risk management processes. The ERMF seeks to ensure the integration of effective risk management across the Group and incorporates Suncorp's policies (which include risk management policies and the Remuneration Policy). Employees understand the importance of managing risk and the link between risk management and the outcomes for our shareholders, customers and employees.

The Board sets the risk appetite for the Group and has ultimate responsibility for the effectiveness of the Group's risk management practices. Suncorp develops its strategy and business plan both in consideration of the Group's risk appetite and with regard to the broader external environment.

In addition to ensuring the remuneration framework is aligned to prudent risk management, the Board also places significant importance on ensuring the framework incentivises desired conduct and behaviours.

Risk and conduct are incorporated into the remuneration framework as outlined below:

Element	Description	
→ Meaningful weighting of non-financial measures in the Group Scorecard, including a separately weighted risk measure in the Group Scorecard	The structure of the Group Scorecard consists of a number of measures across the categories of Financial, Customer, Risk, and People and Culture, with financial measures and non-financial measures equally weighted at 50% each.	
→ STI outcomes are based on both the “what” and the “how”	For KMP, the Board considers behaviours as part of its judgement overlay in determining STI outcomes. For other employees, individual scorecards are weighted 80% towards performance measures and 20% towards the Being @ Suncorp behaviours, with the intent of ensuring that performance outcomes are achieved in the appropriate way.	
For all employees and executives	→ The behavioural STI gateway and modifier linked to the Code of Conduct	The behavioural STI gateway and modifier is based on an employee’s compliance with the Code of Conduct. This can lead to an employee’s STI being reduced (down to nil) if they do not adhere to the Code of Conduct.
	→ The Board’s application of a judgement overlay on the Group Scorecard outcome, with risk management considered as a key component of the overall performance outcome	In determining performance and remuneration outcomes, the People and Remuneration Committee considers adherence to effective risk management practices and all other relevant factors in the context of the Group’s risk appetite. This occurs before the Board makes its final determination of the overall STI pool and individual STI awards for the KMP.
	→ Incorporation of malus and clawback criteria into deferred incentive awards	Deferred incentives (including STI deferred awards and vested and unvested LTI awards) are subject to malus and clawback criteria based on the Board’s judgment. Malus and clawback criteria enable the Board, in its absolute discretion and subject to compliance with the law, to determine that a participant’s deferred incentives will be fully or partially lapsed (malus) during the deferral period or any shares or cash payment made will be fully or partially forfeited, lapsed and / or repaid (clawback). In exercising its discretion, the Board will consider whether this is necessary to protect the Group’s financial soundness or to respond to unforeseen circumstances.
→ The hedging prohibition	Suncorp Group’s Securities Trading Policy regulates dealing by directors, employees and contractors in Suncorp securities and prohibits hedging transactions to limit the economic risk of a holding in Suncorp’s securities including unvested rights. All KMP and other employees are reminded of this policy at least twice per year, usually in the month prior to the release of Suncorp Group’s annual and half-yearly financial results. Any subsequent dealing in those shares is subject to the terms of the Securities Trading Policy.	
For executives only	→ Deferral of a significant portion of STI awards	STI deferral is in place to encourage KMP and EGMs to adopt a longer-term mindset in making decisions and to align the executive and shareholder experience.
	→ Requiring executives to meet the minimum shareholding requirement	KMP are also required to meet minimum shareholding requirements which is equivalent to at least 100% of fixed pay within four years following their appointment.

Risk and financial control personnel

Separate remuneration review processes govern remuneration decisions concerning identified employees working in the areas of risk and financial control (**R&FC Personnel**).

To assist in managing potential conflicts of interest, all R&FC Personnel have a function leader in addition to their direct leader. All short-term incentive outcomes, having regard to the agreed performance measures, are approved by both the direct leader and function leader. The Group Chief Risk Officer (Group CRO) and Group Chief Financial Officer (Group CFO) are the function leaders for risk management roles and financial control roles respectively that do not directly report to them. The Group CEO is the function leader for R&FC Personnel that report to the Group CRO or Group CFO, and the Board acts as the function leader of the EGM Internal Audit, Group CRO and Group CFO.

In addition, R&FC Personnel typically have a comparatively higher percentage of risk-based measures in their scorecard.

Section 2: Quantitative disclosure requirements

	FY22		
	Senior Managers (KMP)	Other Senior Managers	MRT
Number of Individuals ¹	10	20	3
Number of Roles	10	17	3

1. The number of individuals is based on headcount. Where the individual held the disclosed role for a portion of the financial year their remuneration is pro-rated to reflect this.

The table below contains aggregated remuneration details for Senior Managers and MRTs as calculated in accordance with Australian Accounting Standards:

\$000	FY22						FY21					
	Senior Managers (KMP)		Other Senior Managers		MRT		Senior Managers (KMP)		Other Senior Managers		MRT	
	Unrestricted	Deferred	Unrestricted	Deferred	Unrestricted	Deferred	Unrestricted	Deferred	Unrestricted	Deferred	Unrestricted	Deferred
Fixed pay												
Cash-based ¹	8,714	-	6,021	-	900	-	8,041	-	6,277	-	830	-
Other ²	743	-	489	-	99	-	514	-	609	-	93	-
Variable pay												
Cash-based ³	4,733	175	2,387	100	353	0	4,506	-	2,863	71	447	124
Share linked instruments ⁴	-	7,145	2	1,642	2	170	-	5,983	-	1,240	-	30

1. Represents actual fixed pay received, including salary sacrificed benefits.
2. Represents employer superannuation, non-monetary benefits including airfares and insurance premium rebates paid on behalf of the employee, and the net annual leave and long service leave accrual for the financial year.
3. Represents cash incentives earned during the financial year. For Other Senior Managers and MRT below EGM level, the deferred cash portion awarded includes interest accrued on prior year deferred STIs. For Senior Managers (KMP) and Other Senior Managers at the EGM level, the deferred portion of the FY22 and FY21 STI is deferred into share rights, outlined in 'Share linked instruments' under the 'Deferred' column.
4. STI deferred into share rights is expensed to the profit & loss from the start of the performance period to the end of the deferral period and the fair value is amortised from the start of the performance period to the end of the deferral period. Grants made under the LTI plan and Share Rights Plan are expensed to the profit & loss based on the fair value at grant date over the period from grant date to vesting date.

During FY22, 10 Senior Managers (KMP), 15 Other Senior Managers and 3 MRTs received a variable remuneration award. In FY21, 10 Senior Managers (KMP), 18 Other Senior Managers and 3 MRTs received a variable remuneration award. No guaranteed bonuses were made to any Senior Managers and MRTs during FY22 and FY21.

The table below summarises the sign-on and termination payments made or granted to Senior Managers and MRTs in FY22 and FY21.

	FY22						FY21					
	Senior Managers (KMP)		Other Senior Managers		MRT		Senior Managers (KMP)		Other Senior Managers		MRT	
	No. of individuals	Total Amount \$000	No. of individuals	Total Amount \$000	No. of individuals	Total Amount \$000	No. of individuals	Total Amount \$000	No. of individuals	Total Amount \$000	No. of individuals	Total Amount \$000
Special incentive awards	-	-	-	-	-	-	-	-	-	-	-	-
Termination payments ¹	-	-	1	31	-	-	2	1,888	1	438	-	-

1. Termination payments are paid in accordance with contractual commitments.

The table below summarises information on deferred remuneration for Senior Managers and MRTs.

\$000	FY22			FY21		
	Senior Managers (KMP)	Other Senior Managers	MRT	Senior Managers (KMP)	Other Senior Managers	MRT
Total outstanding deferred remuneration¹	15,959	1,713	92	12,885	1,935	106
Cash-based ²	500	67	-	-	-	16
Shares and share-linked instruments ³	15,459	1,646	92	12,885	1,935	90
Total paid during the year⁴	2,453	903	243	1,163	815	67
Total reductions due to explicit adjustments⁵	(4,718)	(191)	-	(4,161)	-	-
Total reductions due to implicit adjustments⁶	(982)	(119)	(1)	-	-	-

- Includes the total outstanding deferred cash and equity awards as at 30 June. Outstanding deferred remuneration is subject to malus and clawback criteria. All deferred remuneration outstanding for Senior Managers and MRTs at 30 June has been included, even where that award was earned in a different capacity within the Group. The deferred balance has been excluded where the Senior Manager and MRT is no longer employed in that capacity at 30 June.
- Deferred cash-based remuneration for FY22 represents the deferred portion of short-term incentives awarded in FY21 and/or FY20, together with the interest accrued on the outstanding deferral, for all Senior Managers and MRTs employed within that capacity as at 30 June. Deferred cash may have been accrued whilst employed in a different capacity within the Group.
- Deferred equity represents the market value as at 30 June, calculated by the number of performance rights or share rights granted multiplied by the closing share price as traded on the ASX on 30 June. The balance consists of all offers up to and including 30 June that are still to vest for Senior Managers and MRTs employed in that capacity as at 30 June.
- Consists of all deferred cash incentives from prior years (and associated interest) paid and deferred equity vested during the financial year, received whilst employed in the capacity of a Senior Manager or MRT.
- Represents the market value at grant date of performance rights, share rights or restricted shares forfeited during the financial year.
- Represents any reduction in the market value at grant date compared to the market value at 30 June for performance rights or share rights yet to vest, or reduction in the market value at grant date compared to the market value at vesting date during the period. Note that increases may have occurred during the period, however only reductions have been disclosed in accordance with the requirements of APS 330.

Appendix 2 - Definitions

AASB 9	AASB 9 <i>Financial Instruments</i> was issued in December 2014. It addresses recognition and measurement requirements for financial assets and financial liabilities, impairment requirements that introduce a forward-looking expected credit loss impairment model, and general hedge accounting requirements which more closely align with risk management activities undertaken when hedging financial and non-financial risks. This standard became mandatory for the annual reporting period from 1 July 2018.
Capital adequacy ratio	Capital base divided by total assessed risk, as defined by APRA.
Collective provision	A collective provision is established to determine expected credit losses (see also Expected Credit Losses definition below) for loan exposures which are not specifically provisioned and can be in the performing or non-performing portfolios. For business banking exposures, a ratings-based approach is applied using estimates of probability of default and loss given default, at a customer level. For portfolio managed exposures, the portfolios are split into pools with homogenous risk profiles and pool estimates of probability of default and loss given default are used to calculate the collective provision.
Common Equity Tier 1 (CET1)	Common Equity Tier 1 capital comprises accounting equity plus adjustments for intangible assets and regulatory reserves.
Common Equity Tier 1 ratio	Common Equity Tier 1 divided by total risk weighted assets, as defined by APRA.
Credit value adjustment (CVA)	A capital charge that covers the risk of mark-to-market losses on the counterparty credit risk.
Eligible collective provisions	Primarily represents the collective provision for impairment on loans and advances in Stage 1 (performing and/or newly originated assets). Provisions for loans and advances in Stage 1 are established to provide for expected credit losses (ECL) for a period of 12 months. Forward-looking provisions for future, presently unidentified losses are also included within the Eligible collective provision balance.
Expected credit losses (ECL)	Expected credit losses (ECL) are calculated as the probability of default (PD) x loss given default (LGD) x exposure at default. The credit models are calibrated to reflect PD and LGD estimates based on historical observed experience, as well as reflecting unbiased forward-looking views of macroeconomic conditions, through macroeconomic variables that influence credit losses, for example unemployment rates and changes in house prices.
General reserve for credit losses (GRCL)	The general reserve for credit losses amount represents the amount of provisions held against non-defaulted exposures that represent a purely forward-looking amount for future losses that are presently unidentified, per APS 111 Capital Adequacy: <i>Measurement of Capital</i> .
Impaired assets	Impaired assets are those for which the Bank has determined that it is probable that it will be unable to collect all principal and interest due according to the contractual terms. The Bank fully considers the counterparty's capacity to repay and security valuation position before an asset is considered impaired.
Ineligible collective provisions	Represents the collective provision for impairment on loans and advances in Stage 2 or Stage 3. Stage 2 assets include assets that have experienced a significant increase in credit risk (SICR) since origination (under-performing loans). Stage 3 assets within ineligible collective provisions include 'past due but not impaired' and 'impaired assets' (non-performing loans, other than those for which a specific provision is held under AASB 9). Collective provisions for loans and advances in Stage 2 and Stage 3 are established to provide for ECL for the remaining term of the loans and advances (lifetime ECL). Ineligible collective provision is considered as specific provision for regulatory purposes under APS 220 <i>Credit Risk Management</i> .
Liquidity coverage ratio (LCR)	An APRA requirement to maintain a sufficient level of qualifying high-quality liquid assets to meet liquidity needs under an APRA-defined significant stress event lasting for 30 calendar days. Absent of a situation of financial stress, the LCR must not be less than 100%. The LCR is calculated as the ratio of qualifying high-quality liquid assets relative to net cash outflows in a modelled APRA-defined 30-day stress scenario.
Loan-to-value ratio (LVR)	Ratio of a loan to the value of the asset purchased.
Past due loans	Loans outstanding for more than 90 days.
Risk weighted assets	Total of the carrying value of each asset class multiplied by their assigned risk weighting, as defined by APRA.
Specific provision	A specific provision for impairment is recognised where there is objective evidence of impairment and full recovery of principal and interest is considered doubtful. The present value of the expected future cash flows is compared to the carrying amount of the loan to determine the specific provision required.
Term Funding Facility (TFF)	On 19 March 2020, the RBA announced the Term Funding Facility (TFF) to support lending to Australian businesses as part of a package of measures to support the Australian economy. Under the TFF, Authorised Deposit-taking Institutions (ADIs) can access three-year funding through repurchase agreements at a fixed interest rate equivalent to the official cash rate at the time of drawdown.
Total assessed risk	Credit risk-weighted assets, off-balance sheet positions, market risk capital charge and operational risk charge, as defined by APRA.