Arbah Capital Company
Authorized by Capital Market Authority
License Number (07083-37)
www.arbahcapital.com

Basel II, Pillar III Disclosures
31 December 2023

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For year ended 31 December 2023

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1. Scope of application

(a) Introduction about this document

This document is a summary of the annual market disclosure report that was undertaken for the closing year-end position of 31 Dec 2023.

The report also includes background information concerning Arbah capital structure, risk exposures, the policies that support Arbah risk assessment and risk management systems as referred to by Article 68 and set out in Annex 10 of Prudential Rules (PRs) issued by the Board of the Capital Market Authority (the "CMA") pursuant to its resolution number 1-40-2012, dated 17/2/1434H corresponding to 30/12/2012G based on the Capital Market Law issued by Royal Decree No. M/30 dated 2/6/1424H, in addition to suggested disclosure requirements.

The purpose of this Pillar 3 report is to provide updated information as of Dec 31, 2023, on our implementation of the Basel capital framework and risk assessment processes in accordance with the Pillar 3 requirements.

(b) Organization

Arbah Capital Company is a Saudi closed joint stock company registered in Al Khobar, Kingdom of Saudi Arabia under Commercial Registration No. 2050059020 dated 4 Rabi' I, 1429H corresponding to March 12, 2008. The Company operates with a capital of SR 142,780,000 fully paid and is divided into 14,278,000 shares at SR 10 par value each. All of them are ordinary shares.

Arbah is authorized and regulated by the Capital Market Authority (the "CMA") as per license of the ("CMA") number 37-07083.

The main activities of the Arbah Capital are Dealing as principal and agent, Underwriting, Managing (establishment and management of mutual funds and portfolio management trading), Arranging, providing advisory and custody services for administrative arrangements and procedures relating to investment funds, portfolio management.

Arbah Capital is a single branch investment bank, whose principal function is to provide Investment banking and wide services to a range of private, business, institutional and HNW investors' customers, it also provides Investment banking services to its owning shareholders.

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(c) Legal Contingencies

There is no material, neither current nor pending legal actions which involve potential liability to Arbah Capital.

2. Capital Structure

(a) The primary objective of the "Arbah Capital" capital management is to ensure that Arbah maintains adequate risk capital, complies with the capital requirements laid down by the CMA and maintains a healthy capital ratio in order to support its business and maximize shareholder value.

- Arbah Capital manages the capital base to cover risks inherent in the business. The adequacy of the capital is monitored using, among other measures, the rules and ratios established by the Basel Committee on Banking Supervision adopted by the CMA.

- Arbah Capital Banking book is maintained, the majority of assets are denominated in Saudi Riyal, consisting of development properties, listed/unlisted equities, mutual fund units, and investments in subsidiaries companies, while minor portion is denominated in USD ,AED & GBP.

- Trading book is maintained, the majority of assets and liabilities are denominated in Saudi Riyal.

- Regulatory capital consists of Tier 1 capital (core capital) and Tier 2 capital (supplementary capital).

- Arbah Tier 1 comprises share capital, statutory reserves, and audited retained earnings, less (dividend distribution, intangible assets, and unrealized losses from FVTOCI investments).

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Table – 1. Capital structure (illustrative Disclosure on Capital Base)

The following table summarizes the capital base after deductions for CAM calculation as of 31 December 2023:

App 1: Illustrative Disclosure on Capital Base:

Tier 1 Capital	
Share capital	142,780
Share premium	0
Retained earning	-17,527
Less Unverified profit	0
Reserves	5,145
Other comprehensive income	-397
Non-controlling interest	0
Less Goodwill and intangible asset	-42
Less Deferred tax asset	0
Less Defined benefit pension asset	0
Tier 1 adjustment	0
Total	**129,959**

Tier 2 Capital	
Subordinated loan	0
Fixed term debt security	0
Perpetual debt security	0
Total	**0**
CAPITAL BASE	**129,959**

3. Capital Adequacy

Arbah Capital approach to assessing capital adequacy has been in line with its risk appetite aligned with its current and future activities.

To assess its capital adequacy requirements in accordance with the CMA prudential requirements.

"Arbah Capital" capital adequacy policy is to maintain a strong capital base to support the development and growth of the business. Current and future capital requirements are determined based on expectations for each business, expected growth in future sources and uses of funds.

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Arbah Capital continuously assesses their adequacy of its capital to support current and future activities through the following measure:

- The process and strategy for assessing its overall capital adequacy and risk profile.
- Maintenance of minimum capital levels and the ability to hold capital in excess of the minimum.
- Review of Internal Capital Adequacy Assessment Process (ICAAP).
- Monitoring and ensuring compliance to CMA regulations with appropriate actions being taken when required
- The ability to intervene at an early stage to prevent capital from falling below the minimum levels.

Our analysis of capital adequacy is summarized as follows:

1. Calculation of capital base based on capital's tier one and two.
2. Developing and calculating risks related to market, credit, and operations. Other risks may be considered based on the circumstances.
3. Calculation of minimum capital required to meet the calculated risks.
4. Calculating capital adequacy ratio and resulting surplus.
5. Drawing results and making recommendations to mitigate impact of risks.
6. The above process should be based upon predefined and set policies, procedures with regular review and monitoring.

With respect to capital adequacy management, Arbah implements the following policies and procedures to manage capital and their adequacy:

- Calculate the capital adequacy ratio on monthly basis in accordance with applicable regulations and guidelines;
- Capital should be of high quality and loss absorbing. Quality of capital is determined through the application of the common and best practice criteria for common equity, and additional tier 1 and tier 2 capitals, with emphasis on retained earnings as the highest quality of capital;
- Capital should adequately protect against unexpected losses. Quantity of capital should rest above regulatory minimums and sufficiently reflect Company's risk appetite and risk profile capturing all material risks and considering forward-looking factors such as the strategic plans;
- Report the capital adequacy ratio along with detailed computations to regulators;
- Maintain minimum capital adequacy and monitor this minimum level on regular basis;
- Identify the impact of investment decisions over risks, liquidity, and capital adequacy;
- Manage assets, liabilities and monitor future cash flows;
- Set a level of leverage ratio for the Company and owned subsidiaries;
- Monitor large exposures and asset concentration on regular basis; and
- Follow up newly released rules and regulations that affect the capital adequacy calculation.

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In the following appendix (2), Arbah capital result showed that the capital adequacy coverage ratio and surplus in capital as of 31 December 2023 are 16.42% and SAR 66,625,000 respectively.

Exposure Class	Exposures before CRM SAR '000	Net Exposures after CRM SAR '000	Risk Weighted Assets SR '000
Credit Risk			
On-balance Sheet Exposures			
Governments and Central Banks	25		38
Public Sector Entity			
Banks and CMIs	10,116		0
Corporates	0		0
Investment Fund	18,115		54,344
Central Counterparty			
Retail	55		166
Margin Lending	1,000		1,500
Equity	50,614		126,534
High Risk Item			
Real Estate	75,025		300,099
Securitisation	0		
Resecuritisation			
Other	10,062		24,414
Total On-Balance sheet Exposures	**165,012**		**507,095**
Off-balance Sheet Exposures			
OTC/Credit Derivatives			
Repurchase agreements			
Securities borrowing/lending			
Commitments	30,429		91,286
Other off-balance sheet exposures			
Total Off-Balance sheet Exposures	30,429		91,286
Settlement Risk			
Adjustment to RWA			
Total On and Off-Balance sheet Exposures	**195,441**		**598,381**
	0		
Total Credit Risk Exposures	**195,441**		**598,381**

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Exposure Class	Exposures before CRM SAR '000		Net Exposures after CRM SAR '000	Risk Weighted Assets SR '000	Capital Requirement SAR '000
Market Risk	Long Position	Short Position			
Interest rate risks					
Equity price risks	7,862				629
Risks related to investment funds					
Securitisation/resecuritisation positions					
Excess exposure risks					
Settlement risks and counterparty risks					
Foreign exchange rate risks	6,818				545
Commodities risks.					
Total Market Risk Exposures	**14,680**				**1,174**

CAPITAL RATIO	
Tier 1 Ratio	**16.42%**
Total Ratio	**16.42%**
SURPLUS	**66,625**

The following table summarizes the capital base held, compared with regulatory requirements, in terms of capital adequacy coverage ratio and surplus in capital as of 31 December 2023:

	SAR '000
Capital Base	**129,959**
Tier-1 capital	**129,959**
Tier-2 Capital	0
Capital ratio	**16.42%**
Surplus in Capital	**66,625**

4. RISK MANAGEMENT

Fundamental to our business is the prudent taking of risk in line with our strategic priorities. The primary objectives of risk management are to protect our financial strength and reputation, while ensuring that capital is well deployed to support business activities and grow shareholder value. Our risk management framework is based on transparency, management accountability and independent oversight.

Risk Management Policies & Procedures

Credit risk, market and liquidity risk are monitored and controlled according to agreed policies and procedures which handle large exposures. Other risks are identified and monitored by the Board, the Chief Executive Officer and Management team by identifying and subjecting to regular review at a frequency reflecting the nature of the risk and degree of business threat.

Risk Appetite and Polices

Arbah unique position, being wholly owned by well-known wealth experienced families in the eastern region, has necessitated a risk adverse approach to business.

Arbah over-riding approach to risk is to safeguard the assets of its clients, treating clients fairly, principles have always been given the highest priority by Arbah throughout its history.
Whilst Arbah Mission Statement highlights the objective of delivering an increasing return to its shareholders, achieving this objective is governed by Arbah ethical basis. Arbah key focus is to provide tailored and high-quality investment banking services to its clients.
Arbah offers quality investment banking products and services that give the client a fair deal with the assurance that their assets will be looked after responsibly, consequently, Arbah is very selective about both the products and services it offers and its investment decisions.

However, within these parameters, Arbah is professional in seeking an increasing profitable return through alert management of cost/income ratios.

Liquidity Policy

In view of Arbah financial position, Arbah has no need for funding or borrowing from other financial institutions and the shareholders have no intention of ever going down this route unless strong fundamental economic opportunities arise.

Liquidity policy is set out in Arbah Policy Statement. It is the responsibility of the Executive Officer, supported by the Management team and overseen by the Board of Directors, to ensure that adequate liquidity is always maintained.

The objective of Arbah liquidity policy is to ensure the management of net maturing liabilities in a controlled fashion and in a way that is consistent with the investment policy of Arbah and its ability to raise funding.

The policy will be affected by adopting a two-dimensional approach to liquidity management by:

- Control over net maturing assets and liabilities; and

- Holding investments in the form of liquid assets which can be easily realized to meet funding needs.

i. Liquidity Risk Tolerance

Liquidity mismatch positions across various time periods are deemed an appropriate basis for setting risk tolerance levels. Arbah ensures that it has sufficient maturing/realizable assets kept meeting all liabilities as they fall due. Liquidity mismatch positions consider all available inflows and potential outflows, with early warning indicators are set for liquidity mismatch positions, so even applying the most severe stress tests, no illiquid positions circumstances are foreseen so far.

ii. Management

Arbah acquires and holds investments in easily realizable securities – duly discounted where appropriate. These securities, together with Arbah balances of cash holdings, give significant cover across varying time periods, so Arbah ensures that it has sufficient maturing assets to meet outflows, based on its knowledge of liabilities which on a day-to-day basis, have responsibility for reinvesting maturing liquid assets.

The Management's ALCO Committee determines the liquidity profile of Arbah before re-investing in the market.

The nature of the Arbah liquidity arrangements and current investments, together with the types of business in which it is engaged, means that it is difficult to envisage a situation whereby there would be insufficient funds to meet a liquidity shortfall.

iii. Monitoring

The Chief Financial Officer calculates mismatch a position across varying time periods on a monthly basis and this is reviewed by the Chief Executive Officer and the Management's ALCO Committee. Any possible mismatches that approach early warning indicator levels are reported to the Board of Director and corrected before tolerance levels are breached. There have been no liquidity mismatch breaches with these controls in place.

4.1 Credit Risk

The key risks facing Arbah have been identified with details of how management measures those risks and what controls and mitigates are in place to limit those risks.
Throughout Arbah Risk Assessment process, simple internal stress and scenario testing is employed to try and ascertain what Arbah key sensitivities are and to try and ensure that adequate capital is in place to cover stressed scenarios, if any.

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4.1.1 Identification & measurement

The risk faced by Arbah is the failure of one or more of its major counterparties. A simple breakdown of credit exposures categorized according to the current investments' exposures, with a 20% fall scenario applied to measure it for the coming quarters.

4.1.2 Controls & Mitigation

Credit risk is principally controlled by establishing and enforcing investment authorization limits, including set-off limits, and by defining exposure levels to counterparties. Daily monitoring of positions ensures that prudential limits are not exceeded. Arbah continues to adopt a conservative investment policy, which has resulted in a low investment default record.
The majority of Arbah' s propriety invested in unrated Saudi listed companies as well as unrated real estate's projects and funds.

Maturity breakdown of credit exposures:

The following table summarizes the residual contractual maturity breakdown of the whole credit portfolio, broken down by major types of credit exposure as of 31 December 2023:

	Up to 1 month SAR 000	1 month to 6 months SAR 000	6 months to 1 year SAR 000	1-5 years SAR 000	Total SAR 000
Governments and central banks	25				**25**
Banks and CMIs	10,116				**10,116**
Listed Equity	3,931				**3,931**
Investments Funds				18,115	**18,115**
Unlisted Equity		5,295	11,819	33,500	**50,614**
Retail	55				**55**
Margin Lending			1,000		**1,000**
Real Estate		19,093	2,736	53,196	**75,025**
Other Assets	2,730	2,599	1,501	3,275	**10,105**
Total	**16,857**	**26,987**	**17,056**	**108,086**	**168,986**

Credit Risk – Geographic Breakdown

The following table summarizes the geographic distribution of the whole credit portfolio, broken down into significant areas by major types of credit exposure as of 31 December 2023:

	KSA SAR 000	BAHRAIN SAR 000	UAE SAR 000	UK SAR 000	USA SAR 000	TOTAL SAR 000
Governments and central banks	25					**25**
Banks and CMIs	10,116					**10,116**
Listed Equity	3,931					**3,931**
Investments Funds	18,115					**18,115**

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Unlisted Equity	25,708	2,805	5295	765	16,041	**50,614**
Retail	55					**55**
Margin Lending	1,000					**1,000**
Real Estate	75,025					**75,025**
Other Assets	9,603				502	**10,105**
Total	**143,578**	**2,805**	**5,295**	**765**	**16,543**	**168,986**

As shown above, around 85% of Arbah assets are in KSA, while the remaining diversified in USA, UAE, UK, and Bahrain.

The below appendices (III, IV, V) are Illustrative disclosure on credit risk's risk weight, rated exposure, and credit risk mitigation (CRM).

- Appendix III: Illustrative Disclosure on Credit Risk's Risk Weight.
- Appendix IV: Illustrative Disclosure on Credit Risk's Rated Exposure.
- Appendix V: Illustrative Disclosure on Credit Risk Mitigation (CRM).

App III: Illustrative Disclosure on Credit Risk's Risk Weight

Risk Weights	Exposures after netting and credit risk mitigation																			
	Governments and central banks	Public Sector Entity	Banks and CMIs	Administrative bodies and NPO	Corporates	Investment Fund	Central Counterparty	Retail	Margin Lending	Equity	High Risk Item	Real Estate	Securitisation	Resecuritisation	Other	Off-balance Sheet Exposures	Settlement Risk	Adjustment to RWA	Total On and Off-Balance sheet Exposures	Total Risk Weighted Assets
0%			10,116																10,116	0
20%																			0	
50%																			0	
100%															3,842				3,842	3,842
150%	25								1,000										1,025	1,538
200%																			0	
250%										50,614									50,614	126,534
300%						18,115		55							4,310	30,429			52,909	158,727
400%												75,025			1,910				76,935	307,740
	25	0	10,116	0	0	18,115	0	55	1,000	50,614	0	75,025	0	0	10,062	30,429	0	0	195,441	598,381

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App IV: Illustrative Disclosure on Credit Risk's Rated Exposure

Exposure Class		Long term Ratings of counterparties						
	Credit quality step	1	2	3	4	5	6	Unrated
	S&P	AAA TO AA-	A+ TO A-	BBB+ TO BBB-	BB+ TO BB-	B+ TO B-	CCC+ and below	Unrated
	Fitch	AAA TO AA-	A+ TO A-	BBB+ TO BBB-	BB+ TO BB-	B+ TO B-	CCC+ and below	Unrated
	Moody's	Aaa TO Aa3	A1 TO A3	Baa1 TO Baa3	Ba1 TO Ba3	B1 TO B3	Caa1 and below	Unrated
	Capital Intelligence	AAA	AA TO A	BBB	BB	B	C and below	Unrated
On and Off-balance-sheet Exposures								
On-balance Sheet Exposures								
Governments and Central Banks								25
Public Sector Entity								
Banks and CMIs			10,116					
Corporates								0
Investment Fund								18,115
Central Counterparty								0
Retail								55
Margin Lending								1,000
Equity								50,614
High Risk Item								0
Real Estate								75,025
Securitisation								0
Resecuritisation								0
Other								10,062
Off-balance Sheet								30,429
Total			10,116					185,325

Exposure Class		Short term Ratings of counterparties				
	Credit quality step	1	2	3	4	Unrated
	S & P	A-1+, A-1	A-2	A-3	Below A-3	Unrated
	Fitch	F1+, F1	F2	F3	Below F3	Unrated
	Moody's	P-1	P-2	P-3	Not Prime	Unrated
	Capital Intelligence	A1	A2	A3	Below A3	Unrated
On and Off-balance-sheet Exposures						
On-balance Sheet Exposures						
Governments and Central Banks						25
Public Sector Entity						
Banks and CMIs			10,116			
Corporates						0
Investment Fund						18,115
Central Counterparty						0
Retail						55
Margin Lending						1,000
Equity						50,614
High Risk Item						0
Real Estate						75,025
Securitisation						0
Resecuritisation						0
Other						10,062
Off-balance Sheet						30,429
Total			10,116			185,325

App V: Illustrative Disclosure on Credit Risk Mitigation (CRM)

Exposure Class	Exposures before CRM	Exposures covered by Guarantees/ Credit derivatives	Exposures covered by Financial Collateral	Exposures covered by Netting Agreement	Exposures covered by other eligible collaterals	Exposures after CRM
Credit Risk						
On-balance Sheet Exposures						
Governments and Central Banks	25					25
Public Sector Entity	0					0
Banks and CMIs	10,116					10,116
Corporates	0					0
Investment Fund	18,115					18,115
Central Counterparty	0					0
Retail	55					55
Margin Lending	1,000					1,000
Equity	50,614					50,614
High Risk Item	0					0
Real Estate	75,025					75,025
Securitisation	0					0
Resecuritisation	0					0
Other	10,062					10,062
Total On-Balance sheet Exposures	**165,012**					**165,012**
Off-balance Sheet Exposures						
OTC/Credit Derivatives						
Exposure in the form of repurchase agreements						
Exposure in the form of securities lending						
Exposure in the form of commitments	30,429					30,429
*Other Off-Balance sheet Exposures						0
Total Off-Balance sheet Exposures	**30,429**					**30,429**
Total On and Off-Balance sheet Exposures	**195,441**					**195,441**

4.2 Market Risk

4.2.1 Identification & measurement

Arbah has market risk given that it operates a trading book; Arbah holds securities in the local stock market. Arbah does not have open positions in commodities at the reporting date.

Arbah mainly deals in local currency Saudi Riyal, United Arab Emirates Dirham and United States Dollar. Since Saudi Arabian Riyals and United Arab Emirates Dirham are pegged to US Dollars, therefore the exposure to foreign currency risk is not significant.

Arbah has an investment in Arbah Sauchiehall/Glasgow amounting to GBP 166,500 in SAR 767,000. Arbah manages exposure to the effects of fluctuations in prevailing foreign currency exchange rates on its financial position and cash flows.

The following table summarizes the equity price risks; the risks related to investment funds; and foreign exchange rate risk of the whole trading book portfolio as of 31 December 2023:

Market Risk	Long Position	Short Position		
Interest rate risks				
Equity price risks	7,862			629
Risks related to investment funds				
Securitisation/resecuritisation positions				
Excess exposure risks				
Settlement risks and counterparty risks				
Foreign exchange rate risks	6,818			545
Commodities risks.				
Total Market Risk Exposures	**14,680**			**1,174**

4.3 Liquidity Risk

4.3.1 Identification & Measurement

Care is taken to ensure the maturity of liabilities is matched with liquid investments.
In terms of the impact of liquidity risk on capital adequacy, further impacts considered for liquidity risk by balancing between illiquid investments vs. liquid to ensure the impacts on short- and medium-term liquidity needs. No illiquid positions circumstances are foreseen so far. The company maintains healthy liquid assets to avoid any liquidity risk.

The following table summarizes the liquidity ratios as of 31 December 2023:

Liquid assets to total assets	19%
Short term assets to short term liabilities	311%

Formula is as follows:

- Liquid Assets to total assets = (Cash and bank balances + Listed Equity and Investments Funds)/total assets

- Short term assets to short term liabilities = Assets with up to one-year maturity/liabilities with up to one-year maturity.

4.4 Concentration Risk

Arbah follows the CMA guidelines with respect to the definition and measurement of large exposures at the consolidated level as stipulated in the PRs for CMIs.

Arbah has a concentration of risk to an individual counterparty in excess of prescribed threshold limit of 25% as at 31 December 2023. This excess is an investment in a real estate investment (Mirot Project). The total exposure and the excess of prescribed threshold limit of 25% as at 31 December 2023 in this investment is summarized as follows:

Total Exposure (SAR ‘000)	42,299
25% capital base limit (SAR ‘000)	32,490
Exposure above 25% capital base (SAR ‘000)	9,809

Arbah is working to exit from this project and resolve this excess. The exit is expected to be completed by the end of the year 2025.

4.5 Economic Risk

It is important for Arbah to understand how sensitive its business is to the boom-and-bust phases of the economic cycle.

4.5.1 Identification & measurement

Periods of high economic growth are likely to see more significant increases in customer products and services and, potentially, higher than budgeted as confidence in the kingdom economy which massively reliance on oil production and prices.
In considering the impact of a recession, several severe impacts have been modeled simply and simultaneous events have been laid over to arrive at a range of stressful scenarios. It is highly unlikely that these would all occur at the same time, but they have been linked together to fully test Arbah business model on top of the current base case.

The common impacts for a severe economic downturn are as follows:

- An increase in default rates
- Property prices down

The alternative scenarios applied are as follows:

1. Arbah / Customer investments to fall
2. Arbah /Client Investments to remain at budgeted levels
3. Combined economic stress with the sustained low interest rate scenario

With the various scenarios applied collectively, when considering capital adequacy there is an element of double-counting given that we assess many of the associated risks separately and hold capital against those individual risks – credit risk, interest rate risk, strategic risk, third party dependency, fraud etc. Arbah self-assessment of capital requirements exceeds any worst-case scenario capital requirements.

4.5.2 Controls & mitigation

Arbah quick reaction to any impact in a recession case served it very well in the past through the change of its business plan, conservative investment, and asset allocations, and offering many alternative investments to client prove that economic stress would be less likely to affect the company expectations.

Operational Risk capital charge

In compliance with CMA requirements, Arbah has adopted the Expenditure Based Approach (EBA) in order to estimate the required capital charge for operational risk as it leads to a higher capital charge than the Basic Indicator Approach (BIA).

(All amounts in '000 SAR)

Expenditure-based Approach	
	Latest Audited Year (2023)
Audited expenditure	38,007
Less: Bonuses, shares in profits and other variable remuneration paid to the employees, directors, or partners (where applicable), to the extent that they are fully discretionary	339
Less: Fees, brokerage, and other charges paid to the CCPs, exchanges, other trading venues and intermediate brokers for the purposes of executing, registering, or clearing transactions, only where they are directly passed on and charged to customers	
Less: Non-recurring expenses from non-ordinary activities	
Less: Expenditure from taxes and zakat where they fall due in relation to the annual profits of CMI	7,193
Adjusted audited expenditure	**30,476**

Income-based Approach				
	Year 2021	Year 2022	Year 2023	Average
Basic Indicator Approach				
Net operating income	35,938	28,456	15,626	
Add: Provision for expected credit losses				
Add: Operating expense				
Less: Non-recurring income from non-ordinary activity				
Less: Net income from discontinued operation				
Adjusted gross income	35,938	28,456	15,626	**26,673**

Operational Risk	Exposure	Risk Charge	Capital Requirement	RWA
Expenditure-based approach				
Adjusted audited expenditure	30,476	25%	**7,619**	**95,237**
Income-based approach				
(A) *Basic indicator approach:* Adjusted gross income	26,673	15%	**4,001**	**50,012**
Operational Risk/ Maximum of (BIA or EBA)			**7,619**	**95,237**

4.6 Strategic Risk (OR)

Arbah considers the implications if it fails to meet the business development targets or if the strategy it pursues were to encourage their main customer.

4.6.1 Identification & measurement

For assessing strategic risk, the following scenarios have been analyzed:

- Fail to invest Arbah own properties.
- Decline in client numbers (Dealing, Managing, and Advisory).
- Zero growth / 50% decline in asset under management (AUM).

4.6.2 Controls & mitigation

Performance against strategic plans and budgets is monitored closely by the executive and investment committee on a monthly basis. A financial review is presented to the Board at each Board Meeting.

In terms of the consequences of strategic risk on capital adequacy, Arbah planning options represent potential actions as it is flexible to change the strategy according to market and business changes.

Arbah has set limits for its business; limits are also broken down into business sector limits to ensure Arbah is not over-exposed in any single business sector.

4.7 Business Continuity (DR)

Physical disasters affecting Arbah premises and continued operations could come in many different forms – fire, flood, terrorism, failure of IT systems, etc. Each of these different threats presents a risk to Arbah. However, the impact of these different threats materializing will have many common implications – all of which will require the invocation of Arbah disaster recovery and business continuity plan.

4.7.1 Identification, measurement, controls and mitigates

Arbah disaster recovery and business continuity plan provides both protection to the Arbah continued operations following physical disasters and an assessment of potential costs. Business continuity contingency plans are tested, at least annually, with any identified failings in plans highlighted and priority given to resolving those failings. The invocation of the Disaster Recovery and Business Continuity Plan in the event of a severe disaster with widespread implications has been considered, although the circumstances of invoking the plan are likely to be less severe. However, in the event of a catastrophe or sequence of events that could prove terminal, Arbah would proceed in accordance with its crisis planning. Third party local Islamic Insurance does provide some mitigation against this risk.

4.8 Third Party Dependency (OR)

There are some key dependencies that Arbah has in terms of some of its suppliers, particularly, in terms of the maintenance and support of its banking software and solutions.

4.8.1 Identification & measurement

Estimates of the cost of replacing key suppliers are arrived at by maintaining awareness of alternative suppliers.

Consideration is given to fat tail events when assessing potential impacts.

4.8.2 Controls & mitigation

The Chief Executive Officer, the Chief Financial Officer and IT services Manager Conduct annual reviews of the financial accounts of key suppliers. Close working relationships are maintained with all key suppliers and management ensures that service levels are acceptable.

4.9 Fraud (OR)

4.9.1 Identification & measurement

In assessing fraud, a distinction is made between 'detected' and 'undetected' fraud. 'Detected' fraud is a regular occurrence and past experience can be used as the basis for its assessment.

'Undetected' fraud could involve significant amounts, although this is deemed unlikely given the controls that Arbah has in place. A conservative view has been taken on its estimation. All events, including fat tail events, would be mitigated significantly by the professional indemnity insurances that are in place.

4.9.2 Controls & mitigation

There are numerous controls to guard against fraud and errors, including:

- Account opening, mandate & account maintenance controls
- Anti-Money Laundering controls
- IT systems & security arrangements
- Segregation of duties
- Independent audit of IT security
- The professional indemnity insurances (partial mitigation)
- Payment controls

Arbah continues to refine its controls in light of detected fraud attempts, if any.

4.10 IT Security (OR)

The integrity of IT systems and data security is given a high focus by management. Many high-profile failings of other organizations have hit the headlines in recent years.

4.10.1 Identification & measurement

Estimates have been made of system replacement costs, emergency support costs, legal fees and fines should a serious breach occur.

4.10.2 Controls & mitigation

Independent IT security audits guard against potential failures and security threats. IT security officer monitor the effectiveness of systems and controls.

Arbah protects its network; procedures also ensure that data is adequately backed up in tapes and placed in disaster recovery servers.

Means of tightening controls are frequently reviewed due to the critical importance of ensuring our data is kept secure.

4.11 Key Staff (OR)

4.11.1 Identification & measurement

Arbah recognizes that due to its small size there is an operational dependency on key individuals. This risk is measured in terms of the estimated cost of replacing key individuals at short notice due to unforeseen circumstances. This includes the cost of employing an interim manager(s), recruiting replacement staff and the cost of extra work for other staff that might be required until the replacement gets up to speed.

4.11.2 Controls & mitigation

It is Arbah policy to rotate roles and overlap responsibilities where appropriate, consistent with maintaining a segregation of duties. As a result, cover for periods of long absence, such as annual leave, has proved effective.
A comprehensive log of operational procedures is maintained and regularly audited. This is a valuable reference point for all staff and is a key training resource. A training plan is incorporated into Performance Appraisal plans for all staff and the company Services Manager, in liaison with other managers, schedules training appropriately.

Arbah Disaster Recovery Plan lists those key roles that would need to be covered if the Disaster Recovery Plan were invoked.
The Chairman and the Chief Executive Officer, in consultation with senior executives, are responsible for succession planning for key posts, such as the appointment of key staff once required.

4.12 Reputational Risk

Reputational risk is the risk of loss arising from the adverse perception of the image of Arbah by customers, counterparties, investors, or regulators. This is particularly relevant on two fronts: firstly, with the ethical standpoint that Arbah takes and, secondly, the fact that small investment banks have to convince customers that they are credible and can offer at least the basic, secure services expected of other big reputable investment banks.

4.12.1 Identification & measurement

This risk can be seen as a knock-on effect of other risks materializing. It compounds the effect of other risks, such as strategy, fraud, and regulatory risk. Reputational risk has not been modeled in isolation but is considered throughout Arbah ongoing risk review process and is built into the assessment of other risk.

4.12.2 Controls & mitigation

The operational systems and controls in place help to mitigate this risk. The loyal customer base also provides some immunity although this would be challenged in the event of Arbah reputation suffering.

4.13 Other Operational Risks

(OR) Risks listed in the table below have been assessed as posing a lower degree of threat in terms of combined frequency and impact:

Risk	Description	Observations
Residual Risk	The risk that credit risk measurement/mitigation techniques may prove less effective than expected.	This risk is incorporated in the assessment of other risks, such as, Economic Risk, Concentration Risk and Collateral Risk.
Regulatory/ Compliance / Conduct	Failure to comply with regulatory requirements and obligations (including the failure to act with Integrity).	Arbah keeps up to date with CMA regulations. Arbah culture is closely aligned with the Shariah committee and shareholders.
Competence/ administration	Failure due to human error, incompetence, lack of training etc.	Assessment part-based on previous years' track record of past losses.
Physical Security	Risk of theft of holdings, documentation, equipment, etc.	Documents are kept in a fireproof cabinet. Staff are kept aware of security procedures.
Reporting Risk	Linked to Regulatory Risk, but specifically concerned with potential failings in Arbah internal and external reporting.	All reports are subject to various reasonableness checks. Internal and external audits are also conducted.
Technology Risk	The risk of new technologies (products and systems) giving other banks a competitive advantage.	Technology in the investment banking sector is constantly changing. Arbah has a loyal customer base. Assessment considers the potential loss of business and the cost of viable new technologies.
Legal Risk	The risk of legal action being taken against Arbah and/or Arbah having to seek legal advice/action.	Treating customer fairly principles are central to the Arbah operations. A planned building maintenance program is in place. Estimates made of potential costs.
Insurance Risk	Uncertainty as to the amount and timing of insured liabilities.	Risk reflects unexpected internal events (e.g. fraud) and industry-wide events (e.g. terrorism) that could impact premiums.