



Methodist Chapel Aid Limited  
Pillar 3 Disclosures  
for the year ended 31 December 2022

## Contents

1. Overview.....	2
1.1 Key Metrics table .....	2
2. Governance - Board and Committees .....	4
2.1 The Board.....	4
2.2 The Board - Recruitment policy.....	4
2.3 The Board – Diversity policy .....	4
2.4 Board and Committee Structure.....	5
2.5 Number of directorships held by members of the Board.....	5
3. Risk Management Policies and Objectives.....	6
4. Capital Resources and Business Strategy .....	6
5. Capital Adequacy .....	7
6. Principal Risks .....	10
6.1 Business Risk .....	10
6.2 Liquidity Risk.....	10
6.3 Market and Interest Rate Risk.....	12
6.4 Operational and Regulatory Risk .....	14
6.5 Credit Risk .....	15
6.6 Capital Risk.....	19
6.7 Climate Change Risk .....	19
7. Remuneration .....	20
8. Asset Encumbrance .....	21
9. Conclusion .....	21
10. Notices.....	21

## 1. Overview

The regulatory framework under which the Company operates comprises principally the Capital Requirements Directive (CRD) and the Capital Requirements Regulations (CRR II), collectively referred to as 'CRD V', containing revisions to the previously implemented CRD IV regulation. CRD V requires capital requirements to be determined on the basis of three 'Pillars':

- Pillar 1: Minimum capital requirement, using a risk-based capital calculation focusing particularly on credit and operational risk.
- Pillar 2: Internal Capital Adequacy Assessment Process ('ICAAP') and Capital Supervisory Review and Evaluation Process ('C-SREP'). The Company has undertaken an assessment of all of the key risks facing the Company and additionally has stress tested those risks to establish a level of additional capital to be held as an internal capital buffer. The results of the Company's assessment are subject to review by the PRA under the C-SREP arrangements.
- Pillar 3: Disclosures of key information on risk exposures and risk management processes by the Company.

CRD V is enforced in the UK by the Prudential Regulatory Authority (PRA), together with UK implementing rules and guidance. The Pillar 3 disclosure requirements are contained in the Disclosure Chapter (Pillar 3) of the PRA Rulebook.

This document has been prepared to meet the Pillar 3 disclosure requirements. It is based upon the Company's Annual Report and Accounts for the year ended 31 December 2022, unless otherwise stated.

The Company's policy is to issue these disclosures on an annual basis as soon as practicable after the publication of the Company's Annual Report and Accounts. These disclosures are published on the Company's website ([www.mcafundingforchurches.co.uk](http://www.mcafundingforchurches.co.uk)).

There is no requirement for the disclosures to be audited; however, some of the information within the disclosures also appears in the Company's Annual Report and Accounts.

The frequency of disclosure will be reviewed should there be a material change in the approach used for the calculation of capital, business structure or regulatory requirements.

### 1.1 Key Metrics table

A summary of the Key Metrics of the Company is shown on the next page.

	31-Dec-22	31-Dec-21
	£'000	£'000
<b>Available own funds (amounts)</b>		
Common Equity Tier 1 (CET1) capital	12,952	13,919
Tier 1 capital	12,952	13,919
Total capital	12,952	13,919
<b>Risk-weighted exposure amounts</b>		
Total risk-weighted exposure amount	24,052	26,369
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>		
Common Equity Tier 1 (CET1) ratio (%)	53.85%	52.79%
Tier 1 ratio (%)	53.85%	52.79%
Total capital ratio (%)	53.85%	52.79%
<b>Additional own funds requirements based on PRA Supervisory Review Process (C-SREP) (as a percentage of risk-weighted exposure amount)</b>		
Additional SREP own funds requirements (%)	0.00%	0.00%
Total SREP own funds requirements (%)	18.27%	18.27%
<b>Combined buffer requirement (as a percentage of risk-weighted exposure)</b>		
Capital conservation buffer (%)	2.50%	2.50%
Institution specific countercyclical capital buffer (%)	0.98%	0.00%
Systemic risk buffer (%)	0.00%	0.00%
Combined buffer requirement (%)	3.48%	2.50%
Overall capital requirements (%)	21.75%	20.77%
CET1 available after meeting the total SREP own funds requirements (%)	32.10%	32.02%
<b>Leverage ratio</b>		
Leverage ratio total exposure measure	38,672	42,114
Leverage ratio	33.49%	33.05%
<b>Liquidity Coverage Ratio</b>		
Total high-quality liquid assets (HQLA) (Weighted value - average)	4,231	4,220
Cash outflows - Total weighted value	2,032	2,801
Cash inflows - Total weighted value	8,745	11,248
Total net cash outflows (adjusted value)	508	700
Liquidity coverage ratio (%)	833%	603%
<b>Net Stable Funding Ratio (NSFR)</b>		
Total available stable funding	35,740	37,077
Total required stable funding	18,568	20,165
NSFR (%)	192%	184%

Note: although there are no C-SREP additional own funds requirements, the Company is required to hold 18.27% of risk-weighted exposures or €5 million (the regulatory base capital requirement), whichever is the greater.

## **2. Governance - Board and Committees**

### **2.1 The Board**

The Board has overall responsibility for the business. It sets the strategic aims for the business within a control framework which is designed to enable risk to be assessed and managed.

The Board satisfies itself that the Company's financial controls and systems of risk management are robust.

As at the reporting date, the Board comprises 9 non-executive directors (including a non-executive Chair) plus the Chief Executive.

### **2.2 The Board - Recruitment policy**

The Company's Articles state that *'the number of Directors shall not be less than five and not more than ten'*.

Directors will retire by rotation every three years. Directors may be re-elected after retiring by rotation. However, in order to ensure the essential spread of skills and experience, effective contact with other relevant organisations, the ability of the Board to keep up to date with the environment within which it operates, and to sustain the high quality of the Board for the future, each Director's appointment will be reviewed towards the end of the Director's three-year period of office.

Recruitment onto the Board combines an assessment of both technical capability and competency. The choice of Directors will be governed by the need to have on the Board a mix of experience and knowledge which are relevant to the Company's operations.

### **2.3 The Board – Diversity policy**

The Board's policy is to have sufficient diversity in its membership to avoid the possibility of 'groupthink' and to increase the perspective of the Board and the Company. The Board is clear that diversity in a number of areas is desirable including gender, ethnicity, age and disability among others. Thus, the Board has adopted a general policy of seeking to enhance diversity among its membership as opportunities arise but without setting any particular targets in advance of the recruitment process.

Recruitment Panels are asked to approach all interview processes with these policy guidelines in mind. It is the Board's clear intention actively to seek a wider diversity in its membership, whilst ensuring that it has the specific experience and skills needed to give the optimum blend of individual and aggregate capability having regard to the Company's Strategic Business Plan.

## 2.4 Board and Committee Structure

The Company is headed by an effective Board of Directors, which meets at least five times a year, and which directs and controls the work of the Company. With the exception of the Chief Executive, the Directors are all non-executive and the Board is supplied, through the offices of its Chief Executive and Company Accountant, who is also its Company Secretary, with information in the form of monthly management accounts, budgets, forecasts, etc. to allow it to discharge its responsibilities.

The Company has an Audit and Risk Committee, consisting of five non-executive Directors which meets at least four times annually and ensures that the recommendations of PRA, the Financial Conduct Authority (FCA) and the internal and external auditors are considered in full and implemented, where appropriate. Other Directors are invited to attend its meetings and often do so. It also oversees the work and considers the reports of the Company's internal audit function and considers the effectiveness of internal controls. To comply with the requirements of legislation and to ensure prudent management of the business, the Company has established a range of internal controls, which have operated effectively throughout the year.

In addition, the Company has a Nomination Committee, consisting of three non-executive Directors which was established to develop a recruitment and remuneration strategy and succession plans for the Board, its Committees and Senior Officers. This also includes developing training and induction processes for Directors and reviewing the Board's employment policy and practice.

As a part of the Company's governance review the Directors meet informally from time to time in order to discuss strategic issues in more depth.

## 2.5 Number of directorships held by members of the Board

	<b>Directorships - Executive</b>	<b>Directorships - Non- Executive</b>
G Alan Pimlott	-	1
Helen E Ashley Taylor	1	1
D Jeremy M Burchill	-	1
Rt Revd Paul J Ferguson	-	2
Anne F Goodman	-	1
Peter Green	1	1
A Christopher Jarratt	1	-
Peter A Mills	1	1
Richard J Price	-	1
Andrew C Slim	4	1

(The above figures include Methodist Chapel Aid Ltd. Directorships in organisations which do not pursue predominantly commercial objectives are not included.)

### **3. Risk Management Policies and Objectives**

The Board has an established risk management framework for the Company that is proportionate to both the size of the Company and the risks to which it is exposed. This framework enables the Board to identify, monitor, control and report on the key risks faced by the Company.

The Company operates within its policies approved by the Board which cover all aspects of its operations.

The consideration and management of risk is included in each of the Company's policies. Risk management is seen as a regular, ongoing process, inter-woven within the strategic and daily operational management of the Company.

The Company has an Audit and Risk Committee, consisting of five non-executive Directors, which meets at least four times annually and ensures that the recommendations of the PRA, the FCA and the internal and external auditors are considered in full and implemented, where appropriate. Other Directors are invited to attend its meetings and often do so. It also oversees the work and considers the reports of the Company's internal audit function, reviewing the implementation of its recommendations where appropriate, and considers the effectiveness of internal controls.

To comply with the requirements of legislation and to ensure prudent management of the business, the Company has established a range of internal controls, which have operated effectively throughout the year.

The Senior Officers are responsible for the day-to-day operation of the business in line with the overall Risk Appetite Statement and the resulting policies, limits and controls. They are also responsible for reporting performance against the internal limits to the Audit and Risk Committee monthly and to the Board for discussion as appropriate at each meeting, and more frequently if necessary. The Board regularly reviews and challenges policies, documents and limits and takes action as necessary.

The Internal Auditor independently provides objective assurance as to the adequacy and effectiveness of internal controls across the business. A risk-based programme of work is undertaken which is designed to provide appropriate coverage of the key business risks and processes. The Audit and Risk Committee approves the annual Internal Audit Plan and receives reports on the results of audit work.

### **4. Capital Resources and Business Strategy**

Capital is held to provide a cushion to absorb losses that may occur during the economic cycle. In assessing the adequacy of its capital, the Company considers its risk appetite, the material risks to which the Company is exposed and the appropriate management strategies for each of the Company's material risks.

The Company's main source of capital is from retained surpluses added to the reserves that have accumulated since the Company's formation in 1890. The Company does not give priority to enhancing the level of dividend paid to its shareholders.

It is essential that the Company maintains sufficient capital to support its ongoing activities and this requirement is an integral part of the Company's corporate planning process. The Company's Strategic Business Plan projects forward and takes into account the need to maintain resources to support the Plan's objectives.

In addition to the corporate planning process the Company is required to undertake an Internal Capital Adequacy Assessment Process (ICAAP) which is a formal process that calculates the Company's capital requirement in normal and stressed conditions.

The ICAAP is reviewed annually by the Board and involves reviewing all of the Company's business activities and calculating the capital required to support them.

The Company undertakes regular stress testing and reverse stress testing with the results of this testing influencing business decisions on an ongoing basis.

The Company has in place limits in relation to both loans and the investment of surplus funds which control the level of exposures which the Company may have in those areas of business.

## **5. Capital Adequacy**

Under the 'Standardised Approach', as specified by the applicable regulations, the minimum level of capital required against a given level of exposure to credit risk is calculated as:

Credit risk capital requirement = Exposure value x Risk weighting x 8%

The risk weighting for each exposure is determined by reference to external credit ratings or regulatory guidance. In addition, an evaluation of the capital required to cover Operational Risk is calculated under the 'Basic Indicator Approach' and determined by reference to the annual gross income of the Company averaged over the previous 3 years.

The resulting capital requirements as at 31 December 2022 are set out on the next page.



	Exposure £'000	Risk Weighted Exposure £'000	Capital Required (8% thereof) £'000
Credit Institutions	12,513	2,713	217
UK Treasury Stocks	5,160	-	-
Collective investment undertakings	3,993	3,092	248
Equity investments	7,160	7,160	573
Higher Risk Weighted Equities	20	30	
Property loans and advances to customers (drawn)	8,470	8,470	678
(50% of undrawn)	1,195	1,195	96
Car loans and advances to customers	16	12	1
Fixed and other assets	145	145	12
<b>Total credit risk exposure</b>	<b>38,672</b>	<b>22,817</b>	<b>1,825</b>
Operational risk capital requirement		1,235	99
<b>Total Pillar 1 Capital Requirement</b>		<b>24,052</b>	<b>1,924</b>

(The Company has no exposures to commodities, foreign currencies or trading-book business)

The Company's approach to calculating its own internal capital requirements has been to take the above calculation of its minimum capital required under Pillar 1 as the starting point, assess whether this is sufficient to cover credit risk and operational risk, and then identify any further capital necessary to cover credit risk, market risk, operational risk, counterparty credit risk, credit concentration risk, interest rate risk and pension risk and assess prudent levels of capital to meet them (Pillar 2A).

The Company's latest internal total Pillar 1 and Pillar 2A capital calculation of £4.7 million is then compared with the latest regulatory Total Capital Requirement (TCR) of £4.4 million as notified to the Company by the Prudential Regulation Authority (PRA) in April 2020, calculated as the higher of

- the €5 million base capital requirement applicable to banks; and
- 18.27% of risk-weighted exposure amounts.

The Company's total internal Pillar 1 and Pillar 2A capital calculation is slightly higher than the regulatory requirement and so the Company's minimum internal capital requirement as at 31 December 2022 is the £4.7 million calculated figure.

The total capital resources of the Company were £13.0 million as at 31 December 2022, (following the shareholders' approval of the audited financial position in the Annual Report and Financial Statements at the Annual General Meeting on 25 April 2023). This was all Common Equity Tier 1 (CET1) Capital as defined in the Capital Requirements Directive, and consisted of the following:

	£
Called up equity share capital	1,197
Reserves (accumulated surpluses after tax)	12,950,822
Total Shareholders' Funds per audited financial statements	12,952,019
Less: regulatory deductions	-
Regulatory Common Equity Tier 1 Capital	12,952,019

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Therefore, the Company achieved headroom of £8.6 million (193%) over the regulatory minimum Total Capital Requirement and 8.3 million (173%) over its internal measure.

The Company is subject to UK accounting standards (FRS 102), whereby the majority of the investment portfolio is recognised in the accounts at fair value. This results in volatility in the Company's reported profitability and is closely monitored as part of the Board's risk management.

CRD V includes a non-risk based leverage ratio to supplement the risk based capital requirements. This ratio shows Tier 1 capital as a proportion of on and off balance sheet assets. The ratio does not distinguish between credit quality of loans and acts as a primary constraint to excessive lending in proportion to the capital base. The current regulations do not apply the minimum requirement of 3.25% (plus countercyclical leverage buffer) to smaller banks and so the Company is exempt. The Company's total on and off-balance sheet exposures at 31 December 2022 were £38.9m. Based on Tier 1 capital resources of £13.0, the Company's Leverage Ratio is calculated at 33.5%.

## **5.1 Regulatory capital buffers**

Pillar 2B covers risks to which the Company may become exposed over a forward-looking planning horizon (e.g. due to changes in the economic environment).

Under Pillar 2B the PRA has set a PRA Buffer defining a minimum level of capital buffer over and above the regulatory requirement that should be maintained in non-stressed conditions as a mitigation against future possible stress periods. This buffer is firm specific, and the PRA requires that the level of this buffer is not publicly disclosed.

The PRA Buffer is assessed alongside other capital buffers, as described below. All buffers must be met with CET1 resources.

### **5.1.1 Capital conservation buffer**

The capital conservation buffer is designed to ensure that institutions build up capital buffers outside of times of stress that can be drawn upon if required. As at 31 December 2022, the applicable capital conservation buffer was 2.5% of risk weighted exposures.

### **5.1.2 Countercyclical capital buffer**

The countercyclical capital buffer requires financial institutions to hold additional capital to reduce the build-up of systemic risk in a credit boom by providing additional loss absorbing capacity and acting as an incentive to limit further credit growth.

Each institution's specific countercyclical buffer rate is a weighted average of the countercyclical capital buffers that apply in the jurisdictions where the relevant credit exposures are located. The Financial Policy Committee (FPC) is responsible for setting the UK countercyclical capital buffer rate (for credit exposures located in the UK) and this was reduced to 0% during 2020 following the onset of the Covid-19 pandemic. It remained at this level throughout 2021 and most of 2022, increasing to 1% with effect from 13 December 2022.

As at 31 December 2022, the Company's specific countercyclical buffer rate was 0.98%, consistent with the UK rate, reflecting the Company's limited overseas exposures.

## **6. Principal Risks**

The principal risks faced by the Company are:

### **6.1 Business Risk**

Business risk arises from changes to a company's business, specifically the risk of not being able to carry out its business plan and desired strategy. In assessing business risk, consideration is given to internal and external factors.

#### *Risk Appetite*

The Company will not take, or retain, risk positions that threaten its ability to remain a sustainable organisation or its ability to meet its primary purpose. The business risk appetite is set by reference to the approved budget and strategic business plan sanctioned by the Board.

#### *Mitigation*

As part of the annual budgeting and planning process, the Company develops a set of management actions to prevent or mitigate any negative impact on earnings in the event that business risks materialise. Additionally, business risk monitoring, through regular reports and oversight, enables the Company to implement corrective actions to plans and reductions in exposures where necessary.

Revenue and capital investment considerations require additional in-depth assessment followed by Board approval. Formal risk assessment is conducted as part of all financial approval processes.

### **6.2 Liquidity Risk**

Liquidity risk is the risk that a company does not have sufficient financial resources to meet its commitments when they fall due, or can secure them only at excessive cost, or that a company does not have sufficiently stable and diverse sources of funding.

#### *Risk Appetite*

The Company's liquidity risk appetite has two elements: its own internal liquidity measurement and also the regulatory liquidity coverage ratio:

#### a) Internal measurement

The Company ensures that it maintains a minimum liquidity position sufficient to meet a demand for payment of all retail deposits repayable within 8 days, even under stressed scenarios. The Board and the Company's management operate a low-risk strategy when compared with liquidity levels and risk profiles of other UK financial institutions with similar business models and this is reflected in the measures that the Company has in place to monitor liquidity. The Company has undertaken stress tests in this regard.

If the Company can easily achieve this test, then it has sufficient liquidity not only for the 0 to 8 day period, but also for a minimum of 90 days due to the nature of the depositor maturity and loan advance profile.

Therefore, the Company has also adopted a liquidity risk appetite based on maintaining sufficient liquid assets to cover at least 100% of anticipated outflows under a 90-day continuous period of market-wide, Company-specific and combined stresses.

b) Liquidity coverage ratio (LCR)

The Company's policy is to maintain a LCR of at least 200% at all times, i.e. double the regulatory minimum, and using only extremely high liquidity and credit quality (level 1) assets, i.e. UK gilts, European Investment Bank (EIB) and KfW bonds.

Additional liquid assets will also be held for internal liquidity management.

*Mitigation*

The Company mitigates the risk of a negative liquidity mismatch (inadequate liquidity) which is outside its appetite by managing the liquidity profile of the statement of financial position through both short-term liquidity management and long-term strategic funding.

The Company aims to maintain a minimum liquidity position that is well in excess of regulatory requirements, even under stressed scenarios, reflecting the organisation's low risk appetite.

*Regulatory metrics*

The Board manages liquidity risk by maintaining a Board-approved Internal Liquidity Adequacy Assessment Process (ILAAP) document. This defines the parameters that must be met to ensure sufficient funds are available at all times, including times of stress, in liquid form. The purpose of the ILAAP is to document and demonstrate the Company's overall liquidity adequacy setting out its approach to liquidity and funding and thereby its compliance with the regulatory overall liquidity adequacy rule.

The key regulatory metric to monitor short term liquidity risk is the LCR, which measures the potential net cash outflow under a prescribed set of assumptions as a proportion of the Company's 'High Quality Liquid Assets' (HQLA). The regulatory requirement is that the LCR will exceed 100%.

The Company's average LCR for the financial year to 31 December 2022 (based on quarterly end-of-month positions over the preceding 12 months) was 827%, as outlined in the table below:

	<b>31-Dec-22</b>	<b>30-Sep-22</b>	<b>30-Jun-22</b>	<b>31-Mar-22</b>
	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>
High Quality Liquid Assets	4,231	4,083	4,501	4,103
Cash outflows - Total weighted value	2,032	1,725	2,108	2,433
Cash inflows - Total weighted value	8,745	9,079	11,501	11,878
Total net cash outflows (adjusted value)	508	431	527	608
<b>LCR (%)</b>	<b>833%</b>	<b>947%</b>	<b>854%</b>	<b>675%</b>
<b>Average based on quarterly end of month</b>	<b>827%</b>			

In relation to funding, the key regulatory metric is the Net Stable Funding Ratio (NSFR) which measures the Company's 'Available Stable Funding' against its 'Required Stable Funding'. The regulatory requirement is that the NSFR will exceed 100%.

The Company's average NSFR for the financial year to 31 December 2022 (based on quarterly end-of-month positions over the preceding 12 months) was 194%, as outlined in the table on the next page.

	<b>31-Dec-22</b>	<b>30-Sep-22</b>	<b>30-Jun-22</b>	<b>31-Mar-22</b>
	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>	<b>£'000</b>
Available amount of stable funding	35,740	35,171	35,892	36,245
Required amount of stable funding	18,568	18,289	17,525	19,273
<b>NSFR %</b>	<b>192%</b>	<b>192%</b>	<b>205%</b>	<b>188%</b>
<b>Average based on quarterly end of month</b>	<b>194%</b>			

### 6.3 Market and Interest Rate Risk

Market and interest rate risk could arise from adverse movements in external markets, e.g. interest rate movements, equity movements or currency movements which could potentially reduce income and/or increase expenses.

#### *Risk Appetite*

The Board's risk appetite for interest rate risk is to manage its assets and liabilities so as to limit the effect of a 2% market rise in interest rates (as calculated in the interest rate gap report) to a maximum of 7% of the Company's regulatory capital.

The average remaining period to maturity for fixed interest investments (excluding investments held by bond funds) will not exceed 8.5 years.

In addition, no fixed interest investment will be held with a remaining maximum term of longer than 15 years.

The Board acknowledges that there is some additional interest rate sensitivity within the equity and bond fund holdings. Consequently, the Company will not hold investment assets with no specific maturity date (i.e. equities, bond funds and other collective investment schemes) with a total value exceeding 100% of the Company's regulatory capital.

The Board has decided to limit the total amount invested in equities (including equity related investment funds) to the lower of:

- 45% of the total market value of funds in the Company's investment portfolio i.e. excluding money market investments and loans to trustees and individuals;
- 25% of the Company's total assets; and
- 80% of regulatory capital.

In relation to UK equities, only equities that are highly liquid (i.e. can be sold within one business day) can be purchased, thereby ensuring that a high quality is maintained and that the liquidity of such investments is not a problem. Corporate bonds are highly rated sterling-denominated direct investments in quoted companies. The Company has no direct exposure to foreign exchange risk as it does not trade in these markets or in currencies other than Sterling.

The Company does not offer any fixed rate deposit or loan products other than car loans (limited to £250,000 in total) and therefore can respond appropriately to movements in market interest rates, within the framework of giving at least 3 months advance notice of any reduction in interest rates payable to customers.

### *Mitigation*

The Company has restricted its investments to highly rated and easily realisable fixed interest and equity stocks. The Company does not expect to incur significant losses upon the sale of these investments.

With regard to interest rate risk the Company's Treasury Policy Statement includes limits for both the average remaining period and the maximum remaining period to maturity for fixed interest investments (excluding investments held by bond funds).

Trigger points are in place in order to respond quickly to adverse market value movements.

### *Summary of exposures to equities*

As at 31 December 2022, the Company's exposure to equities (comprising largely investments in FTSE 350 companies and global equity-related investment funds) is summarised below:

	£'000
Market value	7,180
Book cost	<u>6,174</u>
Unrealised gain	<u>1,006</u>

Net gains of £728,000 were realised on the sale of equity investments during the year ended 31 December 2022.

The equity investments are generally held for the long term and in accordance with the Company's ethical investment policy. The Company is not a dealing company and the main purpose of the equity investments is to generate income to help the Company to achieve its purpose.

The unrealised gains of £1.0 million on the equity exposures and £1.0 million of unrealised losses on fixed interest investments are included in the calculation of the Company's capital resources under the Company's accounting policies as at 31 December 2022 under the UK accounting standard (FRS 102).

### *Net Interest Income Sensitivity*

The principal market risk to which the Company is exposed is the risk of loss from fluctuations in the future cash flows because of a change in market interest rates. Interest rate risk is managed principally through monitoring interest rate gaps between assets and liabilities based upon the next interest rate re-pricing dates as against the contractual maturity dates of the instruments.

The Senior Officers monitor the interest rate risk on a monthly basis and this is reported to the Audit and Risk Committee. The impact of a potential 2% parallel shift in the yield curve against the Company's interest-bearing assets is computed back to a net present value.

The reported interest rate sensitivity on the year-end balance sheet for 31 December 2022 (measured as the effect of a 2% parallel shift in Sterling interest rates) was as follows:

Net Present Value Sensitivity to:	£'000
Positive Shift (+2%)	-498
Negative Shift (-2%)	586

The interest rate sensitivities above are illustrative only and are based on simplified scenarios. The figures represent the effect on net interest income and fixed interest security values arising from a parallel fall or rise in the yield curve and do not take into account the effect of any further actions taken to mitigate the effect.

#### **6.4 Operational and Regulatory Risk**

Operational risk is the risk of reductions in earnings through financial or reputational loss, from inadequate or failed internal processes and systems, operational inefficiencies, or from people related or external events.

Regulatory risk arises due to ever increasing regulatory requirements and the increasing volume and pace of change from the financial regulators. This can impact a company, both operationally in terms of cost of compliance, with uncertainty about legal and regulatory expectations, and strategically through pressure on key earnings streams.

##### *Risk Appetite*

The Company's operational risks arise largely as a result of the following possible events:

- business disruption (including as a result of the failure of key suppliers or the incidence of a pandemic);
- fraud and forgeries;
- fines and penalties (including regulatory);
- staffing issues (including long term sickness);
- health and safety issues; and
- legal cases.

The Company ensures that it adopts all regulatory, legal and other compliance requirements in a proportionate and timely manner.

The Company's operational/regulatory risk appetite is to limit the expected potential losses arising from these events to 2% of the Company's Own Funds (i.e. regulatory capital) in total.

##### *Mitigation*

The Company undertakes the following:

- identification of the key operational risks within the business;
- evaluation of the effectiveness of the existing control framework covering each of the key risks to which the business is exposed;
- evaluation of both the financial risk and non-financial risk (e.g. reputational damage);
- estimation of the exposure to probability and event likelihood for each material risk identified; and
- appropriate action to mitigate or minimise the risk.

The above are embedded into the Company's daily procedures.

## **6.5 Credit Risk**

Credit risk is the risk of a reduction in earnings and/or capital, as a result of the failure of a party with whom a company has contracted to meet its obligations as they fall due (i.e. loan repayments, investments or bank deposits).



## *Risk Appetite*

### Credit Risk (wholesale markets):

The Company will not engage in wholesale deposit lending other than with interbank counterparties with strong long term credit ratings (minimum Moody's rating of Baa3 for UK banks / building societies and A3 for overseas banks / building societies), or allow placements exceeding the Company's internal limits. The amount of deposits placed with any one bank is limited to 25% of the Company's regulatory capital.

In addition, the Company invests in UK government gilts and major company corporate bonds via its Investment Manager, Sarasin & Partners LLP, which operates within parameters and limits agreed by the Board. The corporate bonds are all sterling denominated and the bond portfolio is considered by the Investment Manager to be low risk and well diversified.

### *Mitigation*

After careful checks have been made, the counterparties with whom the Company places deposits are approved in advance by the Board and exposures are subject to Board approved limits as specified in the Treasury Policy Statement.

### Credit Risk (retail markets):

The Company lends to Christian churches and associated organisations only within the UK, Isle of Man and Channel Islands and the total balance on loan at any time is restricted to an internally imposed limit of 70% of the total depositors' balances or 150% of share capital plus reserves, whichever is the lower, less any non-instant access deposit accounts held by the Company with other financial institutions. Individual loan approvals cannot be greater than 10% of the Company's regulatory capital unless agreed by the Board. Term loans above £60,000 are secured by way of a declaration from the trustees as well as a legal charge (unless agreed otherwise by the Board) and loans up to £60,000 by way of a declaration from the trustees. For bridging loans for manse purchases a solicitor's undertaking is obtained to repay the proceeds of the house sale to the Company up to the amount of the loan outstanding.

Car loans to individuals (Methodist presbyters and deacons) are limited to a total balance advanced of £250,000 and a maximum loan of £12,000 per individual.

### *Mitigation*

Financial risk assessments are undertaken on all term property loans (including review of accounts covering three years) and loans are approved in accordance with defined limits and due consideration given to the collateral. All property loans require Director approval in accordance with the Company's lending policy.

### *Provisions*

The Company has a Provisioning Policy which is reviewed by the Board at least annually. The experience of the Company over the whole of its life is that it has never had a bad debt in relation to its property loans. Historically, no provisions in relation to property loans to trustees have been assessed as necessary. However, the Board has agreed in principle to include such provisions in the future if appropriate.

Following the introduction of unsecured car loans to Methodist ministers and deacons a provision for bad debts has been made. This is 2.5% of the outstanding capital balance on car loans at the year end. The actual amount of the provision will therefore vary each year.

The need to raise a specific provision when a borrower requests a rescheduling of repayments will be considered at the time by the Chief Executive.

At 31 December 2022, the total provisions were £401. This comprised a general provision in respect of car loans (2.5%). The total provision increased by £143 in the year.

The property loans (excluding bridging loans) are repayable half-yearly on 30 June and 31 December. All payments due on 31 December 2022 have been received, including one in early January 2023 and, following receipt of these funds, no property loans are currently in default of agreed payment terms.

#### *Geographical Breakdown of exposures*

A geographic breakdown of credit risk exposures at 31 December 2022 is shown below:

	<b>UK</b>	<b>Rest of</b>	<b>Rest of</b>	<b>Total</b>
	<b>£'000</b>	<b>Europe</b>	<b>World</b>	<b>£'000</b>
		<b>£'000</b>	<b>£'000</b>	
Credit Institutions	12,513	-	-	12,513
UK Treasury Stocks	5,160	-	-	5,160
Collective investment undertakings	3,993	-	-	3,993
Equity investments	6,718	423	39	7,180
Loans and advances to customers (incl. 50% of undrawn)	9,681	-	-	9,681
Fixed and other assets	145	-	-	145
<b>Total</b>	<b>38,210</b>	<b>423</b>	<b>39</b>	<b>38,672</b>

#### *Geographical Breakdown of loans advanced*

A breakdown of loan balances (excluding undrawn loans) as at 31 December 2022 analysed by region is shown on the next page.

	Property		Total
	Loans	Car Loans	
	£	£	£
<b>England</b>			
North East	148,353	-	148,353
North West	675,980	-	675,980
Yorkshire and The Humber	707,816	-	707,816
East Midlands	624,062	-	624,062
West Midlands	346,507	-	346,507
East of England	289,167	12,237	301,404
London	2,844,561	-	2,844,561
South East	2,145,756	3,792	2,149,548
South West	496,000	-	496,000
	<b>8,278,202</b>	<b>16,029</b>	<b>8,294,231</b>
<b>Scotland</b>	41,667	-	41,667
<b>Wales</b>	150,000	-	150,000
<b>Northern Ireland</b>	-	-	-
<b>Channel Islands / Isle of Man</b>	-	-	-
	<b>8,469,869</b>	<b>16,029</b>	<b>8,485,898</b>

#### *Credit Quality*

The table below sets out the credit quality of indirect corporate bond investments held via collective investment undertakings (on a see-through basis) as at 31 December 2022.

The Company has adopted the standardised approach to credit risk and follows the standard mapping of credit quality steps to ratings provided by Standard & Poor's.

Whilst the Company uses credit risk mitigation techniques where suitable, these are not used in the calculation of the Pillar 1 capital requirements. Hence the exposure values and exposure values after credit risk mitigation are the same:

Credit quality step	Collective Investment Undertakings		
	Risk Weight	Exposure £'000	Exposure after credit risk mitigation £'000
1	20%	447	447
2	50%	1,154	1,154
3	100%	1,909	1,909
4	100%	415	415
5	150%	-	-
6	150%	68	68
		<b>3,993</b>	<b>3,993</b>

All investments in treasury stocks, multilateral development banks and regional governments and local authorities are credit quality step 1.

As at 31 December 2022, all exposures to financial institutions have a residual maturity of 6 months or less and the exposure by credit quality step is as shown below:

<b>Deposits with UK Financial Institutions with effective maturity of 6 months or less</b>			
<b>Credit quality step</b>	<b>Risk Weight</b>	<b>Exposure</b>	<b>Exposure after credit risk mitigation</b>
1	20%	11,813	11,813
2	50%	700	700
		<b>12,513</b>	<b>12,513</b>

*(For the above short-term deposits with financial institutions, the Company used standard mapping of credit quality steps to ratings provided by Moody's. The above table includes £435,000 of funds held short-term by the Company's Investment Manager for investment).*

## 6.6 Capital Risk

Capital risk is defined as the risk that a company has insufficient capital to provide a resource large enough to absorb losses or that the capital structure is insufficient to meet regulatory requirements.

### *Risk Appetite*

The Company's target is to maintain its capital resources at a level which is substantially above the regulatory minimum plus an internally calculated buffer to cover potential stresses as identified in the Company's Internal Capital Adequacy Assessment Process (ICAAP) document.

### *Mitigation*

The Company has developed an early warning system to enable the occurrence of the risks to its capital base to be quickly identified and corrective action taken where necessary.

The Company adopts a prudent and responsible approach to the management of capital and has prepared a detailed ICAAP document which is approved by the Board annually.

The Board accepts that there is inherent risk in running a banking business. It is the Company's policy to minimise the impact of unavoidable risks and further mitigate them wherever the costs of doing so are proportionate to the potential impact.

## 6.7 Climate Change Risk

Climate change risk is defined as a risk resulting from climate change and affecting natural and human systems and regions. Climate change risk is likely to manifest itself in physical events such as extreme weather conditions; it may lead to systemic changes in public policy as society moves to a low-carbon economy, and it may affect the ability of the Company to deliver its services, or affect the value of the Company's assets and loan security.

There is increased focus on these risks by key stakeholders (e.g. customers) and the regulatory landscape is evolving to reflect these risks. As such, there is also the potential

reputational risk associated with the Company investing in organisations which could be seen as responsible for, or contributing to, climate change.

### *Risk Appetite*

The financial risks of climate change to the Company are primarily in relation to the market risks associated with its effect on the Company's investment portfolio and the credit risks of lending to Christian churches and associated organisations.

Therefore, the risk appetite is considered within other existing risk categories, i.e. market risk and credit risk.

### *Mitigation*

The Company will continue to develop its consideration of sustainability and climate related issues and integrate these within the risk register and monthly management information schedules.

Stress testing/scenario analysis is carried out in respect of significant falls in the value of the Company's investments, reductions in investment income and the credit risks of lending to Christian churches and associated organisations, as part of the annual ICAAP. The results are used in calculating the internal capital buffers. It is recognised that climate change could be a driver for such stresses e.g. increased natural disasters.

The Board requires the Investment Manager to demonstrate a continued commitment to recognising and responding to climate change as part of their investment decision making process. This may include performing climate stress testing (based on both de-carbonisation and physical stresses) and deciding whether to divest or engage with companies based on the results. In addition, the Board requires the Investment Manager to align with the goals of the Paris Climate Accords (as updated by any revised global commitments that result from new scientific research), including pressing investee companies to align to these goals.

As the scientific evidence on climate change becomes ever clearer, the Company will further embed climate risk in its existing risk management framework.

## **7. Remuneration**

The Company is subject to the Remuneration Code (the Code). The aim of the Code is to ensure that all firms within scope have risk-focused remuneration policies that are consistent with and promote effective risk management and do not expose them to excessive risk.

The Company is required to disclose certain qualitative and quantitative information. It is confident that its policies and procedures, covering salaries, bonuses and pension arrangements, comply with the requirements of the Code.

The Company seeks to ensure that its remuneration decisions are in line with its business strategy and long-term objectives, and consistent with the Company's ethos, current financial condition and future prospects. The Company does not operate any committed variable remuneration schemes for any staff and does not make any bonus payments.

The Board has identified that those Directors and staff whose professional activities have a material impact on the Company's risk profile are the:

- Non-Executive Directors (9 in total);

- Chief Executive; and
- Company Accountant

i.e. all Directors and staff excluding the 3 Administrative Assistants.

Aggregate information on the remuneration of these (including Employer's National Insurance) is given below:

	<b>Fixed Remuneration £</b>	<b>Variable Remuneration £</b>
Senior Officers (Note)	150,627	-
Non-Executive Directors	40,842	-
	191,469	-

Note: Senior Officers' remuneration includes overtime and 9% of their salaries in lieu of a pension contribution

Remuneration for staff is considered by the Nomination Committee whose proposals are then reviewed and approved by the Board. Generally, these reflect inflation and market considerations. Remuneration is set at a level which is adequate to attract qualified and experienced staff.

The remuneration of all non-executive Directors is reviewed annually by the Board as a whole and approved by the shareholders at the AGM.

In the exceptional case of other payments to Directors, these are proposed and approved by the shareholders at the AGM before the payment is made.

The Company's small size and small number of employees means that it does not have a Remuneration Committee. However, the Nomination Committee makes recommendations to the Board in relation to the development of a recruitment and remuneration strategy and succession plans for the Board and its Committees and for its staff.

## **8. Asset Encumbrance**

The Company has no encumbered assets.

## **9. Conclusion**

This disclosure document is intended to provide background information on the Company's approach to risk management as related to maintaining and preserving the capital position of the Company.

In the event that a user of this document has comments or requires further information they are requested to contact the Company using the details shown in Section 10 or by e-mailing [info@mcafundingforchurches.co.uk](mailto:info@mcafundingforchurches.co.uk).

## **10. Notices**

This Disclosure is based on the Company's latest ICAAP review (using figures as at 31 December 2022) and is subject to periodic review and update.

The information contained in this disclosure has not been audited by the Company's external auditors.

Methodist Chapel Aid Ltd is registered in England and Wales and its registration number is 30546.

The Company is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (Firm Reference No: 204508).

The registered office address of the Company is: 1 Telford Terrace, Albemarle Road, York, YO24 1DQ. Tel: 01904 622150.