Basel III Pillar 3 and Leverage Ratio disclosures of

**ALTERNA BANK** 

**December 31, 2020** 

# ALTERNA BANK Basel III Pillar 3 and Leverage Ratio disclosures December 31, 2020

## 1. Scope of Application

CS Alterna Bank, a member of the Canada Deposit Insurance Corporation ("CDIC"), operates under the name "Alterna Bank". It is a Schedule 1 Bank and received letter patents from the Minister of Finance of Canada to operate under the Bank Act on October 2, 2000. Alterna Bank is regulated by the Office of the Superintendent of Financial Institutions ("OSFI").

The registered office address of Alterna Bank is 319 McRae, Ottawa, Ontario, K1Z 0B9. The nature of Alterna Bank's operations and principal activities are the provision of deposit taking facilities and loan facilities to the clients of Alterna Bank across Canada.

The Pillar 3 and Leverage Ratio Disclosures are unaudited and provide additional summary descriptions and quantitative financial information which supplements those made in Alterna Bank's audited financial statements for the year ended December 31, 2020. The disclosures produced within this document have been prepared in accordance with minimum disclosure requirements as interpreted by OSFI and established under the OSFI Advisory on Pillar 3 Disclosure Requirements (April 2017), Capital Disclosure Requirements (May 2018) and COVID – 19 Measures – FAQs for Federally Regulated Deposit-Taking Institutions (April 2020).

In response to COVID-19, OSFI introduced transitional arrangements for Expected Credit Loss (ECL) provisioning that are available under the Basel Framework. The transitional arrangements have resulted in an adjustment such that a portion of allowances that would otherwise be included in Tier 2 capital to instead be included in Common Equity Tier 1 ("CET1") capital. The adjustment to CET1 capital will need to be measured each quarter as the increase in Stage 1 and Stage 2 allowances relative to the baseline level. For Alterna Bank, the baseline level is the amount of Stage 1 and Stage 2 allowances as at the quarter ending December 31, 2019. This increased amount is adjusted for tax effects and subject to a scaling factor that will decrease over time. The scaling factor has been set at 70% in fiscal 2020, 50% in fiscal 2021 and 25% in fiscal 2022. Note 2 – Capital Structure and Note 3 – Leverage Ratio have disclosed the impacts of these transitional arrangements.

#### Comparison with Alterna Bank's audited financial statements for 2020

The financial statements have been prepared on a historical cost basis, except for fair value through other comprehensive income investments ("FVOCI"), derivative financial instruments and financial assets and financial liabilities held at fair value through profit or loss ("FVTPL"), which have been measured at fair value. Changes in fair value of investments designated as FVOCI are reported in accumulated other comprehensive income until sale or impairment occurs, at which time the cumulative gain or loss is transferred to the statements of income.

The preparation of financial statements in conformity with International Financial Reporting Standards ("IFRS") requires management to make estimates and assumptions that affect the application of policies and reported amounts of assets, liabilities, revenues and expenses. The estimates and associated assumptions are based on historical experience and various other factors that are believed to be reasonable under the circumstances. Actual results may differ from management's estimates.

The Pillar 3 and Leverage Ratio Disclosures have been prepared in accordance with regulatory capital adequacy concepts and rules, rather than in accordance with IFRS. Therefore, some information in the Pillar 3 and Leverage Ratio Disclosures is not directly comparable with the financial information in the Alterna Bank's audited financial statements for 2020.

#### Significant subsidiaries

Alterna Bank has no subsidiaries or entities for consolidation.

## 2. Leverage Ratio

The Leverage Ratio ("LR") is calculated by dividing Tier I capital by Total Exposure and the regulatory minimum LR requirement for Alterna Bank is 3.0% (2019 - 3.0%). The calculation of Total Exposure is determined by OSFI-

prescribed rules and includes on-balance sheet derivatives and other off-balance sheet exposures. The following table summarizes the Bank's all-in Basel III Pillar 3 Leverage Ratio as at December 31, 2020 and December 31, 2019 as required by OSFI in connection with the 2015 Basel Committee on Banking Supervision Basel III Leverage Ratio Framework and Disclosure Requirement:

Table 1: LEVERAGE RATIO FRAMEWORK								
(thousands of Canadian dollars, except as noted)								
Item	2020	2019						
On-balance sheet exposures								
1 On-balance sheet items (excluding derivatives, SFTs and grandfathered securitization exposures but including collateral)	1,086,274	1,026,686						
5 Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of lines 1 to 4) 1,086,274								
Derivative exposures								
6 Replacement cost associated with all derivative transactions	920	270						
7 Add-on amounts for potential future exposure associated with all derivative transactions	918	1,645						
11 Total derivative exposures (sum of lines 6 to 10)	1,838	1,915						
Other off-balance sheet exposures								
17 Off-balance sheet exposure at gross notional amount	54,360	26,267						
18 (Adjustments for conversion to credit equivalent amounts)	(46,238)	(23,571						
19 Off-balance sheet items (sum of lines 17 and 18)	8,122	2,696						
Capital and Total Exposures								
20 Tier 1 capital	81,141	77,074						
20a Tier 1 Capital with transitional arrangements for ECL provisioning not applied	81,094	n/a						
21 Total Exposures (sum of lines 5, 11, 16 and 19)	1,096,234	1,031,297						
Leverage Ratios		•						
22 Basel III leverage ratio	7.4%	7.5%						
22a Leverage ratio with transitional arrangements for ECL provisioning not applied	7.4%	n/a						

The on-balance sheet items exposure as per Table 1 above is reconciled to total assets as per Alterna Bank's audited financial statements in the table below:

Table 2: LEVERAGE RATIO FRAMEWORK - Reconciliation of on-balance sheet exposure to total assets		
(thousands of Canadian dollars, except as noted)		
Item	2020	2019
On-balance sheet items (excluding derivatives, SFTs and grandfathered securitization exposures but including collateral)	1,086,274	1,026,686
Add: Derivative adjustment	660	617
Less: Collective allowance	(119)	(28)
Total Assets as per Alterna Bank's audited financial statements	1,086,815	1,027,275

## 3. Capital Structure

OSFI's regulatory capital guidelines under Basel III allow for two tiers of capital. Total capital includes Tier 1 and Tier 2 capital, net of certain deductions. Tier 1 capital represents more permanent forms of capital, and includes Common Equity Tier 1 ("CET1") capital less deductions required under Basel III. CET1 capital primarily includes common shareholder's equity and preferred shares. Tier 2 capital is typically comprised of subordinated debentures and the eligible portion of the general loss allowance. The Tier 1 Capital Ratio and Total Capital Ratio are the primary capital measures monitored by Alterna Bank's regulator. Alterna Bank's Tier 1 capital which includes common shares, retained earnings, other comprehensive income and regulatory adjustments for deferred tax assets, and Tier 2 capital which includes stage 1 and stage 2 loan allowances.

The risk-based regulatory capital ratios are calculated by dividing CET1, Tier 1 and Total capital by Risk-Weighted Assets ("RWA"). The calculation of RWA is determined by the OSFI-prescribed rules relating to on-balance sheet and off-balance sheet exposures and includes amounts for operational risk exposure associated with the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events. In addition, OSFI formally establishes risk-based capital minimums for deposit-taking institutions. These minimums are currently at CET1 capital ratio of 7.0%, Tier 1 capital ratio of 8.5% and a Total capital ratio of 10.5%.

The table below provides the modified minimum composition of capital disclosures under Basel III as required by

OSFI for the year ended December 31, 2020 and December 31, 2019.

TABLE 3: CAPITAL STRUCTURE		
(thousands of Canadian dollars, except as noted)	2020	2010
Transitional Common Equity Tier 1 capital: instruments and reserves	2020	2019
1 Directly issued qualifying common share capital (and equivalent for non-joint stock companies) plus related stock surplus	57,000	57,000
2 Retained earnings	23,251	18,688
3 Accumulated other comprehensive income (and other reserves)	843	1,386
6 Common Equity Tier 1 capital before regulatory adjustments	81,094	77,074
Common Equity Tier 1 capital: regulatory adjustments	01,024	77,077
26 Other deductions or regulatory adjustments to CET1 as determined by OSFI	47	n/a
28 Total regulatory adjustments to Common Equity Tier 1	47	n/a
29 Common Equity Tier 1 capital (CET1)	81,141	77,074
29a Common Equity Tier 1 Capital (CETI) with transitional arrangements for ECL provisioning not applied*	81,094	n/a
Additional Tier 1 capital: regulatory adjustments	01,00	
43 Total regulatory adjustments to Additional Tier 1 capital	-	_
44 Additional Tier 1 capital (AT1)	-	_
45 Tier 1 capital (TI = CETI + ATI)	81,141	77,074
45a Tier 1 Capital with transitional arrangements for ECL provisioning not applied	81,094	n/a
Tier 2 capital: instruments and allowances	•	
50 Collective allowances	72	28
51 Tier 2 capital before regulatory adjustments	72	28
Tier 2 capital: regulatory adjustments		
57 Total regulatory adjustments to Tier 2 capital	=	_
_ 58 Tier 2 capital (T2)	72	28
59 Total capital (TC = T1 + T2)	81,213	77,102
59a Total Capital with transitional arrangements for ECL provisioning not applied	81,213	n/a
60 Total risk-weighted assets	195,758	220,008
Capital ratios		
61 Common Equity Tier 1 (as percentage of risk-weighted assets)	41.45%	35.039
61a CET1 Ratio with transitional arrangements for ECL provisioning not applied	41.43%	n
62 Tier 1 (as percentage of risk-weighted assets)	41.45%	35.039
62a Tier 1 Capital Ratio with transitional arrangements for ECL provisioning not applied	41.43%	n
63 Total capital (as percentage of risk-weighted assets)	41.49%	35.059
63a Total Capital Ratio with transitional arrangements for ECL provisioning not applied	41.43%	n
OSFI target		
69 Common Equity Tier 1 capital all-in target ratio	7.00%	7.009
70 Tier 1 capital all-in target ratio	8.50%	8.50
71 Total capital all-in target ratio	10.50%	10.50

Alterna Bank is in compliance with the imposed regulatory capital requirements.

## 4. Capital Adequacy

Under Section 485(1) of the Bank Act and OSFI Capital Adequacy Requirements, Alterna Bank must maintain minimum capital requirements to support its ongoing operations. These capital requirements are based on total assets and types of assets that Alterna Bank owns and operational risk arising from its business activities and operating environment. As a general rule, the larger the total assets or riskier the asset types, the greater the capital required. The regulatory minimum leverage ratio for all banks is prescribed by OSFI. As at December 31, 2020, the prescribed regulatory minimum leverage ratio is 3.0%.

In assessing the risk associated with Alterna Bank's assets, OSFI Capital Adequacy Requirements provides guidance on the risk weights for each asset type. Capital required for risk-based assets is referred to as the Basel III Pillar 1 risk-based capital requirement. Alterna Bank's policy minimum is set in accordance with its Internal Capital Adequacy Assessment Process ("ICAAP").

Basel III Pillar 1 does not capture all aspects of the overall risk profile and Pillar 2 addresses these limitations. Alterna Bank is tasked with implementing an ICAAP to enhance its capital management practices. Alterna has also developed and employed robust risk management techniques to ensure it has adequate capital in relation to its risk profile and a strategy for maintaining its capital levels. In assessing Alterna Bank's capital requirements, management captures all risks across the enterprise and provides capital accordingly. The capital management planning ensures that the organization is well capitalized to manage in times of economic difficulty.

Alterna Bank uses the standardized approach for credit risk for all on-balance sheet portfolios and the basic indicator approach for all components of operational risk. Alterna Bank does not have any trading book assets or liabilities and therefore no capital is required for market risk.

The following table provides an overview of the movement in the risk-weighted assets by risk type during the year ended December 31, 2020:

TABLE 4: RISK WEIGHTED ASSETS					
(thousands of Canadian dollars, except as noted)					
Risk weighted assets	Dec 31, 2019	Mar 31, 2020	Jun 30, 2020	Sep 30, 2020	Dec 31, 2020
Credit risk	202,113	188,264	158,101	161,105	173,794
Market risk	-	-	-	-	-
Operational risk	17,895	18,101	24,292	23,998	21,964
Total risk weighted assets	220,008	206,365	182,393	185,103	195,758

For further information regarding Alterna Bank's risk management framework and processes, please refer to Note 5 of Alterna Bank's 2020 audited financial statements.

#### 5. Credit Risk: General Disclosures

For qualitative disclosures with respect to definitions of past due and impaired loans, description of approaches followed for assessment of individual and collective allowances, and discussion of the credit risk management policy, refer to the following notes to Alterna Bank's 2020 audited financial statements:

Notes:	Reference
Impairment of financial assets	2(e)
Nature and extent of risks arising from financial instruments	5

## 6. Credit Risk: Disclosures by Counterparty type, Geography and Industry

The following table reconciles the total gross credit exposure to the total assets as per Alterna Bank's audited financial statements for the year ended December 31, 2020 and December 31, 2019:

TABLE 5: RECONCILIATION OF GROSS CREDIT EXPOSURE TO ON-B.	ALANCE SHEET ASSE	ETS					
(thousands of Canadian dollars, except as noted)		•					
	Decemb	er 31, 2020	December 31, 2019				
	Total	RWA	Total	RWA			
Total Gross Credit Exposure	\$ 1,060,263 \$	138,692 \$	995,532 \$	168,354			
Off-Balance Sheet Gross Credit Exposure	(7,211)	(484)	(2,054)	(432)			
On-Balance Sheet Gross Credit Exposure	1,053,052	138,208	993,478	167,922			
Individual Allowance	(33)	-	(53)	-			
On-Balance Sheet Gross Credit Exposure (net of individual allowance)	1,053,019	138,208	993,425	167,922			
Other Assets (not included in Standardized Approach)	33,915	35,102	33,878	33,759			
Total Assets subject to Credit Risk (net of individual allowance)	1,086,934	173,310	1,027,303	201,681			
Collective Allowance	(119)	-	(28)	0			
Operational Risk	0	21,964	0	17,895			
Total On-Balance Sheet Assets/Risk-Weighted Assets	\$ 1,086,815 \$	195,274 \$	1,027,275 \$	219,576			

The breakdown of total gross credit exposure by counterparty, and by major types of exposure as at December 31, 2020 and December 31, 2019 is provided in the table below:

## TABLE 6: TOTAL GROSS CREDIT EXPOSURE BY COUNTERPARTY TYPE

(thousands of Canadian dollars, except as noted)

						Dece	mbe	r 31, 2020	Dece	mbe	r 31, 2019
		Drawn xposure	 ommitmen (Undrawn)	Dei	OTC rivatives*	Total		RWA	Total		RWA
Standardized											
Sovereign	\$	31,749	\$ -	\$	-	\$ 31,749	\$	-	\$ 35,633	\$	-
Bank		254,337	-		1,838	256,175		51,235	145,259		29,052
Corporate		23,332	-		-	23,332		23,332	25,102		25,102
Retail Residential Mortgages		742,264	5,373		-	747,637		63,208	787,533		112,777
Other Retail (excl. SBEs)		1,370	-		-	1,370		917	2,005		1,423
<b>Total Gross Credit Exposure</b>	\$ 1	,053,052	\$ 5,373	\$	1,838	\$ 1,060,263	\$	138,692	\$ 995,532	\$	168,354

<sup>\*</sup> includes replacement values

The geographic distribution of the total gross credit exposures broken down by major types of credit exposure as at December 31, 2020 and December 31, 2019 is provided in the table below:

TABLE 7: TOTAL GROSS CRE	EDIT I	EXPOSURE	BY	GEOGRAP	HY	7						
(thousands of Canadian dollars	, exce	pt as noted)										
		Drawn	C	ommitments		OTC						
		Exposure		(Undrawn)		Derivatives*		December	31, 2020	December 31, 2019		
Standardized												
Canada												
Ontario	\$	585,828	\$	5,373	\$	1,838	\$	593,039	56.0 %	\$	526,139	52.9 %
Quebec		92,769		_		_		92,769	8.7		113,266	11.4
British Columbia		215,672		_		_		215,672	20.3		221,470	22.2
Alberta		113,476		_		_		113,476	10.7		92,385	9.3
Saskatchewan		29,509		_		_		29,509	2.8		27,728	2.8
Manitoba		12,589		_		_		12,589	1.2		10,649	1.1
Nova Scotia		1,376		_		_		1,376	0.1		1,210	0.1
Newfoundland		814		_		_		814	0.1		1,287	0.1
New Brunswick		1,019		_		_		1,019	0.1		1,209	0.1
Prince Edward Island		0		_		_		0	0.0		189	0.0
Total Gross Credit Exposure	\$	1.053.052	S	5,373	\$	1.838	S	1.060.263	100.0 %	S	995,532	100.0 %

<sup>\*</sup> includes replacement values

The industry distribution of total gross credit exposure broken down by major types of credit exposure as at December 31, 2020 and December 31, 2019 is provided in the table below:

## TABLE 8: TOTAL GROSS CREDIT EXPOSURE BY INDUSTRY

 $(thousands\ of\ Canadian\ dollars,\ except\ as\ noted)$ 

				Decembe	er 31, 2020	Decembe	r 31, 2019
	Drawn Exposure	Commitments (Undrawn)	OTC Derivatives *	Total	Exposures	Total	Exposures
Standardi zed							
Sovereign \$	31,749 \$	- \$	- \$	31,749	3.0 % \$	35,633	3.6 %
Bank							
Financial Services	254,337	-	1,838	256,175	24.2	145,259	14.6
Corporate							
Financial Services	8,934	-	-	8,934	0.8	8,261	0.8
Real Estate	12,486	-	_	12,486	1.2	14,990	1.5
Services	1,850	_	_	1,850	0.2	1,850	_
Other	60	_	_	60	0.0	_	
Retail Residential Mortgages	742,266	5,373	_	747,639	70.5	787,534	79.1
Retail (excl. SBEs)	1,370	_	_	1,370	0.1	2,005	0.2
Total Gross Credit Exposure \$	1,053,052 \$	5,373 \$	1,838 \$	1,060,263	100.0 % \$	995,532	100.0 %

For residual contractual maturity of the total portfolio segregated by major types of credit exposure, refer to Note 5 of Alterna Bank's 2020 audited financial statements.

The lifetime expected credit losses ("ECL") on the credit-impaired loans were approximately \$33,000 (2019 - \$54,000) or 0.003% (2019 - 0.005%) of total gross credit exposure at December 31, 2020. Therefore, no additional disclosures related to industry and geographic areas of these loans have been presented. For the accounting policy on the measurement of the ECL, refer to Note 2(e) of Alterna Bank's 2020 audited financial statements.

For credit-impaired loans and reconciliation of changes in the loss allowance, refer to Note 4 and Note 5 of Alterna Bank's 2020 audited financial statements.

# 7. Credit Risk: Disclosures for Portfolios Subject to the Standardized Approach

The External Credit Assessment Institutions ("ECAI") used by Alterna Bank are Dominion Bond Rating Service ("DBRS"), Standard & Poor's ("S&P"), Moody's Investors Services ("Moody's", and Fitch Rating Services ("Fitch"). DBRS, S&P, Moody's, and Fitch ratings are recognized by OSFI as eligible ECAI's and are used to assess the credit quality of all exposure classes, where applicable, using the credit quality assessment scale that is set out by OSFI in its 'Capital Adequacy Requirement – Standardized Approach'. It is Alterna Bank's Investment/Derivative policy that investments held to fund normal course of operations must be rated 'A' or better, and investments held above the requirement amount to fund normal course of operations must be rated 'BBB' or better.

The table below provides the amount of bank's outstanding credit exposure in each risk bucket.

TABLE 9: TOTAL GROSS (	CREDI	TEXP	OSUR	E SUBJECT TO	STANDARDIZED	APPROA	CH BY RISK W	EIGHT				
(thousands of Canadian dol	lars, ex	cept a	s noted	d)							<u>.</u>	
								Decer	nber 31, 2020	December 31, 2019		
		Risk ight		Drawn Exposure	Commitments (Undrawn)	OTC Derivatives Total		RWA	Total	RWA		
Standardized												
Sovereign	0	%	\$	31,749 \$	_	\$	- \$	31,749 \$	- \$	35,633 \$	_	
Bank												
AAA to AA-	20			254,337	_		1,838	256,175	51,235	145,259	29,052	
Corporate												
AAA to AA-	20			-	-		-	-	-	-	_	
BBB+ to BB- or Unrated	100			23,332	_		-	23,332	23,332	25,101	25,101	
Retail Residential Mortgages												
Qualifying Insured	0			542,006	4,812		_	546,818	_	448,077	-	
Qualifying Insured	20			46,634	535		-	47,169	9,434	40,186	8,037	
Qualifying Uninsured	35			153,624	26		-	153,650	53,774	299,271	104,741	
Other Retail **	20			168	-		-	168	34	91	18	
Other Retail **	75	%		1,202	-		-	1,202	883	1,914	1,405	
Total Gross Credit Exposu	re		\$	1,053,052 \$	5,373	\$	1,838 \$	1,060,263 \$	138,692 \$	995,532 \$	168,354	

 $<sup>*\</sup> includes\ replacement\ values$ 

## 8. Credit Risk Mitigation

General qualitative disclosures with respect to credit risk mitigation are presented in Note 5(a) of Alterna Bank's 2020 audited financial statements. The following information gives details of the exposure (including those on balance sheet and/(or) off-balance sheet, where netting is not applicable) covered by eligible financial collateral and by guarantees/credit derivatives.

<sup>\*\*</sup> RWA based on net credit exposure of \$1,345

TABLE 10: TOTAL GROS	SS C	REDIT EXP	OSU	RE, FINAN	CIA	L COLLATE	RA	L AND GUAR	RANT	EE			
(thousands of Canadian d	ollar	s, except as	noted	1)									
						Dec	em	ber 31, 2020				Decen	nber 31, 2019
						Financial						Financial	
Standardized		Total		RWAs		Collateral		Guarantees		Total	RWAs	Collateral	Guarantees
Sovereign	\$	31,749	\$	-	\$	-	\$	-	\$	35,633 \$	-	\$ - \$	-
Bank		256,175		51,235		-		-		145,259	29,052	-	-
Corporate		23,331		23,331		-		-		25,101	25,101	-	-
Retail Residential													
Mortgages		747,638		63,209		-		588,641		787,534	112,778	-	488,263
Other Retail (excl. SBEs)		1,370		917		_		_		2,005	1,423	-	
<b>Total Gross Credit</b>													
Exposure	\$	1,060,263	\$	138,692	\$		\$	588,641	\$	995,532 \$	\$ 168,354	\$ - \$	488,263

## 9. Counterparty Credit Risk

All of Alterna Bank's derivative contracts are Over-the-Counter ("OTC") call option and forward contracts that are privately negotiated between Alterna Bank and the counterparty to the contract.

For qualitative and quantitative disclosures relating to fair value methodology, hierarchical classification, credit risk mitigation and maturities of derivative portfolio, refer to the following notes to Alterna Bank's 2020 audited financial statements:

Notes:	Reference
Derivatives and Hedging	2(h)
Fair Value of Financial Instruments	20
Nature and Extent of Risks arising from Financial Instruments	5
Derivative Financial Instruments	21

#### 10. Operational Risk

Alterna Bank has adopted the basic indicator approach in determining its operational risk capital requirement.

Operational risk is the risk of loss resulting from failed or inadequate infrastructure, including internal or outsourced processes, people, information technology, and customer management.

Operational risk is inherent in all of its activities, including the practices and controls used to manage other risks such as credit, market, and liquidity risk. Failure to manage operational risk can result in significant financial loss, reputational harm, or regulatory disapproval and penalties.

Alterna Bank has established policies that have been approved by the Board to manage and control operational risk. The Board policies govern the activities relating to oversight of business continuity, incident management and operational processes pertaining to third party, data, financial crime and fraud, on-going projects, technology, information and cyber security. Operations and the handling of day-to-day risks are the responsibility of management. In this regard, detailed operating procedures have been developed to successfully execute business strategies, operate efficiently and provide reliable, secure, and convenient access to financial services. One of the key controls built into the procedures is the concept of segregation of duties, whereby transactions of any consequence require the interaction of more than one person. Furthermore, appropriate insurance policies are used as a risk mitigation strategy where appropriate to lower risk.

## 11. Remuneration

Alterna Bank is a wholly-owned subsidiary of Alterna Savings and Credit Union Limited, a credit union operating in the province of Ontario. Alterna Bank due to its small size and to reduce its need for capital expenditures outsources certain management and other services to assist in conducting its business. These services are provided by Alterna Savings, and are identified in the Outsourcing Agreement between Alterna Bank and Alterna Savings.

There are no executives employed by Alterna Bank; rather, executive services are included in the Outsourcing Agreement. Payments for these services include those made to executives overseeing branch operations and finance. Compensation costs attributable to other senior executives, such as the President & CEO, Senior Vice President &

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Chief Administrative Officer, and Senior Vice President & Chief Information Officer are allocated to Alterna Bank as part of an overhead component attached to the price charged by Alterna Savings for various transactions.

The employees of Alterna Bank are governed by the remuneration policies of Alterna Savings. In addition to their salaries, Alterna Bank's employees participate in Alterna Saving's group benefits plans (which provides certain health care, dental care, life insurance, and other benefits), as well as Alterna Savings' pension plan and corporate bonus plan.

Alterna Savings' executive compensation program is overseen by the Governance Committee of its Board (the "Committee"). The Committee is comprised of five (5) Directors, they convene at a minimum on a quarterly basis, and in 2020 one meeting was held at which compensation matters were addressed. The Committee, among other duties, is responsible for reviewing the remuneration structure for Alterna Savings' executive management to the Alterna Savings Board of Directors, as defined in an Executive Compensation Policy (the "Policy"). The objectives of the Policy address the key risks related to remuneration and are as follows: support the attraction and retention of high caliber executives; provide competitive total rewards that encourage high levels of group and individual performance, and align the interests of Alterna Savings' executives with those of its members. The Policy is reviewed annually by the Committee for approval by the Board of Directors. The current year Policy review was completed on December 4, 2020.

Alterna Savings' executives participate in a short-term incentive plan ("STIP") based on key organizational value drivers that include, but are not limited to, financial and strategic measures. The STIP is offered at the discretion of the CEO and Board of Directors. The Board of Directors may seek the advice of external compensation experts to ensure that total remuneration for executives remains aligned with the Policy. Alterna Savings currently doesn't have a long-term incentive plan.

For the different forms of remuneration that Alterna Bank utilizes and for quantitative disclosures, refer to Note 25(a) of its 2020 audited financial statements.