Community Trust Company

Basel III Pillar 3 Disclosures

March 31, 2017

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Part 1 - Scope of Application

Community Trust Company ("CTC" or the "Company") is a federally regulated company licensed under the Trust and Loan Companies Act (Canada) (the "Act") and is incorporated and domiciled in Canada. The Company provides estate, trust, deposit, loan and mortgage services including guaranteed investment certificates, registered saving plans, personal loans and residential and non-residential mortgages. CTC participates in the National Housing Authority ("NHA") Mortgage Backed Security ("MBS") and Canada Mortgage Bond ("CMB") programs. CTC is a private company.

This document fulfills a key requirement of the Basel III Framework, encouraging market discipline by allowing market participants to assess increased disclosure surrounding both the risk management framework and the capital adequacy of the Company.

Basis of preparation

This document represents CTC's Basel III Pillar 3 disclosure made pursuant to the Office of the Superintendent of Financial Institutions ("OSFI") requirements, which are based on global standards established by the Bank of International Settlements, Basel Committee on Banking Supervision ("BCBS").

The amounts disclosed in this document for the period December 31, 2016 are audited, the Company's quarterly interim consolidated financial statements are unaudited, and reflect the financial position and results of operations of the Company consolidated with the financial position and results of operations of its special purpose entity. The consolidated financial statements are prepared in accordance with International Financial Reporting Standards ("IFRS") as issued by the International Accounting Standards Board ("IASB"), including the accounting requirements specified by the OSFI, and reflect, where necessary, management's best estimates and judgments. This report and the disclosures within it are unaudited. The quarterly results of the Company are also unaudited.

The Pillar 3 Disclosures along with the Company's financial information are presented in Canadian dollars. Except as otherwise indicated, financial information presented in Canadian dollars had been rounded to the nearest thousand.

Significant subsidiaries

The Company owns a subsidiary that holds real estate property for use by the Company. The subsidiary's results are consolidated into the results of the Company.

Statement of Risk Appetite

Risk appetite is an expression of the level of risk that CTC is prepared to accept in order to achieve its business objectives. CTC takes a conservative approach to risk and integrates this approach within its business model and strategic objectives.

Verification

The *Pillar 3 Disclosures* are not required to be subjected to external audit. The disclosures are verified and approved through internal reporting procedures of the Company.

Comparison with the Company's Annual Report
The *Pillar 3 Disclosures* have been prepared in accordance with regulatory capital adequacy concepts and rules, as applicable, and otherwise prepared in accordance with *International Financial Reporting Standards* ("IFRS") which is the basis on which the Company's financial statements are prepared.

The preparation of the *Pillar 3 Disclosures* along with the Company's financial statements in conformity with IFRS require management to make judgements, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities, income and expenses. Actual results may differ from these estimates. Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised and in any future periods affected. Information about significant areas of estimation uncertainty and critical judgements in applying accounting policies that have the most significant effect on the amounts recognized in the financial statements are described in respective notes of the Company's Annual Report. Questions in respect of the Company's Annual Report or disclosures provided in this document should be directed to the Company's Corporate Secretary.

Part 2 - Basel and Community Trust Company

The Basel II framework consists of three pillars each of them concentrating on a different aspect of banking regulation.

- Pillar 1 makes recommendations for calculation of minimum capital requirements.
- Pillar 2 discusses the key principles of supervisory review and risk management guidance.
- Pillar 3 complements the first two pillars of Basel II by requiring a range of disclosures on capital and risk assessment processes, aimed at encouraging and reinforcing market discipline. Basel III requires enhanced disclosure specifically as it relates to capital disclosures.

Corporate Governance

The Company maintains a strong culture of corporate governance through its Board oversight structure, which includes the following Board committees:

- Executive Committee
- Credit Review Committee
- Conduct Review and Compensation Committee
- Audit Committee
- Governance and Compliance Committee
- Risk Review Committee

The Company seeks to achieve long-term sustainable risk adjusted growth in order to ensure its health and stability of earnings while protecting its brand, reputation and the interests of its depositors and customers and investors.

The Board of Directors (“Board”) ensures that:

- Management of regulatory compliance and aims to be fully compliant with the regulatory limits, constraints, and requirements within the respective specified timeframes.
- Maintenance of capital adequacy as required by the regulators.
- Sound and successful management of risks that the Company is exposed to, mainly, but not limited to: credit, competition, funding and liquidity, interest rate, media and reputational, operational, and regulatory risks.
- Maintenance of a stable and strong risk profile and the elimination of risks not central to the business strategy.

Risk Management

The Company’s Management and Board have developed and approved a Capital Management Policy in accordance with its Enterprise Risk Management Framework (“ERM”) which includes the Company’s risk appetite framework and stress testing program. Adherence to the Capital Management Policy ensures that the Company has sufficient capital to maintain its operations based on current activities, expected business developments in the future and the possibility of various disruptive or adverse scenarios. Such scenarios include periods of economic downturn and/or asset re-pricing. In addition, in accordance with the Company’s annual strategic planning, a 3-year forecast is prepared and provides guidance as to the type and extent of capital that will be required over this period of time.

The Company uses the Internal Capital Adequacy Assessment Process (“ICAAP”) to determine the quantity and quality of capital to conduct its business activities. In preparing the ICAAP, the high risk areas established in the ERM are subject to stress testing which incorporates assumptions established in the annual strategic planning process. The results of the stress tests help to determine the magnitude of capital required to enable management and the Board to set capital levels appropriate with the Company’s risk appetite.

The Company’s Risk Review Committee (“RRC”) is responsible for overseeing the types of risk to which the Company may be exposed and of the techniques and systems used to identify, measure, monitor, report on and mitigate those risks. It is also responsible for reviewing capital management plans recommended by Management.

Capital Adequacy

The Company's objectives with respect to capital management are to comply with capital requirements set by the regulator, to safeguard the Company's ability to continue as a going concern so that it can continue to provide returns for shareholders and benefits for other stakeholders, and to maintain a strong capital base to support the development of the business.

Capital levels for Canadian Financial Institutions are regulated pursuant to guidelines issued by OSFI, based on standards issued by the Bank for International Settlements, Basel Committee on Banking Supervision. Regulatory capital is allocated to two tiers: Tier 1 and Tier 2. Tier 1 capital comprises the more permanent components of capital and consists primarily of common shareholders’ equity and non-cumulative preferred shares. Tier 2 capital consists of subordinated debentures. Total capital is defined as the sum of Tier 1 and Tier 2 capital.

During the year the Company continued to enhance its ICAAP which examines a number of risks which generally are not included in the standardized asset risk weighting model. Internally this model is used to determine additional capital which it may need to be set aside to address these risks.

The responsibility for overall capital allocation principles and decisions rests with the Company's Board. The Board monitors total capital against all material risks identified with respect to the Company's business lines. Through the internal governance processes, the Company's senior management is responsible for the investment and capital allocation decisions and assessments, and ensures that returns on investment are adequate after taking account of capital (capital vs. risk) requirements. The strategy is to allocate capital to business lines on the basis of their economic profit generation, and regulatory and economic capital requirements. The Company prepares its business 'baseline' forecasts (by months) including capital forecasts within its Annual Budget and Capital planning process.

In addition to the Tier 1 and Total capital ratios, Canadian financial institutions are required to ensure that their Leverage Ratio does not breach a minimum level prescribed by OSFI. The Company's Leverage Ratio remains above the minimum prescribed by OSFI.

Capital Restructuring

During Q4-2016, with the prior approval from the Office of the Superintendent of Financial Institutions ("OSFI"), the Company entered into agreements with the holder of the subordinated debentures to redeem all outstanding debentures in exchange for 519,892 Class B Preferred Shares, Series 1 (each share was issued at a par value of $25.00). The Class B Preferred Shares, Series 1 are a new share issuance in the current year. The Company paid interest on the debentures up to and including the date of the redemption.

During Q4, with the prior approval of from OSFI, the Company completed a restructuring of its capital which resulted in the improvement in its overall capital position and respective regulatory capital ratios. The restructuring included the following:

- A redemption of all subordinated debentures in exchange for 519,892 Class B Preferred Shares Series 1.
- The payment of dividends on the Class A Preferred Shares in the amount of $1,069. The dividends were in respect of undeclared cumulative dividends as at December 30, 1998. The dividends were paid in-kind by way of 66,813 common shares.
- The purchase for cancellation of the outstanding Class A Preferred Shares in the amount of $6,110, in consideration for 381,852 common shares.

During Q4-2016, 448,664 new common shares were issued as a result of the capital restructuring: 66,813 shares in respect of the payment of dividends in-kind, and 381,852 shares issued as consideration for the Class A Preferred Shares that were purchased for cancellation by the Company.

Part 3 – General Disclosures

Capital Structure

The Company's internal capital consists of Common Equity Tier 1 capital, Additional Tier 1 capital, Tier 2 capital and subordinate debt.

- Common Equity Tier 1 capital consists of common shares and retained earnings.
- Additional Tier 1 capital consists of preferred shares
- Tier 2 capital consists of subordinated debt in compliance with OSFI Guideline A requirements for Tier 2 instruments. (up to Q4-2016)
- The Company has authorized an unlimited number of common shares. As of March 31, 2017, the Company had 2,953,504 common shares issued and outstanding.
- The Company calculates its regulatory capital ratios in accordance with OSFI's Capital Adequacy Guidelines.

Capital Structure				
All-In Basis	**Jun-30**	**Sep-30**	**Dec-31**	**Mar-31**
$ 000's	**2016**	**2016**	**2016**	**2017**
Common shares	18,206	18,206	25,385	25,385
Retained earnings	26,142	27,749	27,400	29,416
Accumulated other income (and other reserves)	-	-	-	-
Regulatory adjustments	(1,112)	(1,053)	(1,167)	(1,108)
Common Equity Tier 1 Capital	43,236	44,902	51,618	53,693
Non - cumulative perpetual preferred shares	6,110	6,110	12,997	12,997
Additional Tier 1 capital	6,110	6,110	12,997	12,997
Book value of unsecured subordinated debt	12,997	12,997	-	-
Less: accumulated amortization for capital adequacy purposes	-	-	-	-
Tier 2 capital	12,997	12,997	-	-
Tier 1 capital and Total regulatory capital	**62,343**	**64,009**	**64,615**	**66,690**

Transitional Basis	**Jun-30**	**Sep-30**	**Dec-31**	**Mar-31**
$ 000's	**2016**	**2016**	**2016**	**2017**
All- in Common Equity Tier 1 capital	43,680	45,323	51,761	53,914
Transitional adjustments	-	-	-	-
Common Equity Tier 1 capital	43,680	45,323	51,761	53,914
Additional Tier 1 capital	6,110	6,110	12,997	12,997
Tier 2 capital	12,997	12,997	-	-
Tier 1 capital and Total regulatory capital	**62,787**	**64,430**	**64,758**	**66,911**

Risk-weighted assets
The Company's risk-weighted assets include all on-balance sheet assets weighted for the risk inherent in each type of asset, an operational risk component based on a percentage of average risk-weighted. The Company uses the standardized approach for credit risk for all on-balance sheet assets, basic indicator approach for operational risk and the standardized approach for market risk.

The Company's investment securities may consist of bank debt securities, government and provincial debt securities and corporate debt securities and publicly traded corporate equities. Investment securities have risk-weightings ranging from 0% to 100% based on their credit rating. Mortgages receivables, consisting of residential mortgages, have a risk-weighting of 35%. All other assets are risk-weighted at 100%.

Weighted Assets				
All-In Basis Risk - Weighted Assets $ 000's	**Jun-30 2016**	**Sep-30 2016**	**Dec-31 2016**	**Mar-31 2017**
Equities	-	-	-	-
Deposits with regulated financial institutions	21,375	27,716	30,102	42,662
Residential mortgages	106,821	134,775	163,969	194,754
Residential reverse mortgages	99	100	101	103
Non-residential mortgages	153,352	151,698	162,939	157,241
Other assets	31,067	36,849	42,391	49,136
	312,714	351,138	399,502	443,896
Off-balance sheet exposure	149	1,229	164	22
Credit risk	312,863	352,367	399,667	443,918
Operational risk (average three-year gross income)	18,998	21,318	24,348	27,825
Total risk - weighted assets	**331,861**	**373,685**	**424,015**	**471,743**

Transitional Basis Risk - weighted assets $ 000's	**Jun-30 2016**	**Sep-30 2016**	**Dec-31 2016**	**Mar-31 2017**
Total risk-weighted assets on all-in basis	331,861	373,685	424,015	471,743
Transitional adjustments	445	421	467	221
Total risk-weighted assets on Transitional basis	**332,306**	**374,106**	**424,482**	**471,964**

Leverage Ratio (in $000's	**Jun-16 2016**	**Sep-16 2016**	**Dec-31 2016**	**Mar-31 2017**
Tier 1 capital	49,346	51,012	64,615	66,690
Total Exposures	563,731	662,536	747,573	880,546
Leverage ratio	8.75%	7.70%	8.64%	7.57%

Capital ratios				
ALL-IN BASIS	**Jun-30 2016**	**Sep-30 2016**	**Dec-31 2016**	**Mar-31 2017**
Common Equity Tier 1 Capital Ratio	13.03%	12.02%	12.17%	11.38%
Tier 1 Capital Ratio	14.87%	13.65%	15.24%	14.14%
Total Capital Ratio	18.79%	17.13%	15.24%	14.14%
TRANSITIONAL BASIS	**Jun-30 2016**	**Sep-30 2016**	**Dec-31 2016**	**Mar-31 2017**
Common Equity Tier 1 Capital Ratio	13.14%	12.12%	12.27%	11.42%
Tier 1 Capital Ratio	14.98%	13.75%	15.33%	14.18%
Total Capital Ratio	18.89%	17.22%	15.33%	14.18%

The Company complied with the OSFI guideline related to capital ratios and Leverage. Both the Tier 1 and Total Capital Ratios remain above OSFI's stated minimum capital ratios of 7% and 10.5%, respectively, for a well-capitalized financial institution.

Credit Risk

Basel III applies three approaches to the calculation of Pillar 1 Credit Risk capital requirements. The basic level, the Standardized Approach, requires the use of external credit ratings to determine the risk weightings applied to rated counterparties. Other counterparties are grouped into broad categories and standardized risk weightings are applied to these categories. The remaining approaches are the Foundation Internal Ratings Based Approach (IRB) and the Advanced IRB Approach. In the Foundation IRB banks are allowed to develop their own empirical model to estimate the probability of default for individual clients or groups of clients. In the Advanced IRB banks develop their own empirical model to quantify required capital for credit risk (including probability of default, exposure at default, loss given default and risk weighted assets).

The Company applies the Standardized approach.

The Company performs regular monitoring of its risks, assessments, and related action plans. Senior management and the Board obtain information that allows them to keep informed regarding the effectiveness of their risk management process and activities. The RRC assists the Board in fulfilling these responsibilities.

Credit risk is the potential for financial loss if a borrower or counterparty in a transaction fails to meet its obligations in accordance with agreed terms. Credit risk on cash and cash equivalents is mitigated by maintaining cash balances at Schedule I Canadian chartered banks. Credit risk on the mortgage loans is mitigated by following Board-approved underwriting policies. Each mortgage originated is limited in maximum dollar amount and loan-to-value ratio in accordance with internal guidelines.

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Cash Resources and Securities				
$ 000's	Jun-30 2016	Sep-30 2016	Dec-31 2016	Mar-31 2017
Cash and non-interest bearing deposits with banks	47,445	50,553	34,801	54,744
Equities	-	-	-	-
	47,445	**50,553**	**34,801**	**54,744**

Exposure by Loan Types				
$ 000's	Jun-30 2016	Sep-30 2016	Dec-31 2016	Mar-31 2017
Single family - residential mortgages	311,460	398,365	470,782	558,456
Multi-family residential mortgages	53,533	62,305	77,733	75,994
Non-Residential mortgages	83,911	75,549	75,679	69,842
Total mortgages	448,904	536,219	624,194	704,292
Personal loans	147	134	166	29
Commercial loans	3,455	2,352	3,850	100
Total loans	3,602	2,486	4,016	129
Total lending	**452,506**	**538,705**	**628,210**	**704,421**

Impaired Loans

The following table shows mortgages which management considers impaired, and the appraised value of those underlying properties. Mortgages are classified as impaired when, in the opinion of Management, there is reasonable doubt as to the collectability, either in whole or in part, of principal and/or interest.

Impaired Loans				
$ 000's	Jun-30 2016	Sep-30 2016	Dec-31 2016	Mar-31 2017
Mortgage principal plus accrued interest	1,151	3,791	2,916	2,245
Individual allowances	(176)	(133)	(133)	(186)
	975	3,658	2,783	2,059
Appraised value of underlying properties	**1,453**	**4,878**	**3,776**	**2,990**

Allowance for Mortgage Losses

The allowance for mortgage losses is maintained at a level that is considered adequate to absorb incurred losses to the mortgage loan portfolio. A mortgage allowance is recorded when, in the opinion of management, there is no longer reasonable assurance of the collection of the full amount of principal and interest. Mortgage allowances, in an amount that approximates the present value of projected future cash flow shortfalls, are determined based on mortgage loans outstanding and the most recently adjusted appraised value of the underlying properties. The Company has both individual and collective allowances as described below.

Individual Allowances

Individual allowances are recorded when, due to identified conditions specific to a particular mortgage, management believes there is no longer reasonable assurance of the collection of the full amount of principal and interest. The Company only reports loans in arrears less than 30 days, where at the end of the subsequent month the loan has moved into the greater than 30 days arears category.

Collective Allowances

Collective allowances are provided for losses incurred within the mortgage portfolio but not yet specifically identified and therefore not yet captured in the determination of individual allowances. The Company follows a methodology in assessing its collective allowances which considers industry conditions, market conditions, arrears, and trends as well as its own loss history, and considers the impact on the lending portfolio.

Collective Allowances				
$ 000's	Jun-30 2016	Sep-30 2016	Dec-31 2016	Mar-31 2017
Individual allowances				
Balance, beginning of year/quarter	173	176	133	133
Provision for credit losses	3	(43)	-	53
Write-offs	-	-	-	-
Recoveries				
Balance, end of year/ quarter	**176**	**133**	**133**	**186**
Collective allowances				
Balance, beginning of year/quarter	2,644	2,720	2,749	2,868
Provision for credit losses	(100)	29	119	127
Balance, end of year / quarter	2,544	2,749	2,868	2,995
Total allowances	2,720	2,882	3,001	3,181
As a % of total mortgages outstanding	**1.05%**	**1.01%**	**0.92%**	**0.90%**

Operational Risk

Basel II includes capital requirements for operational risk, again utilizing three levels of sophistication. The capital required under the basic indicator approach is a simple percentage of gross revenues, whereas under the standardized approach, it is one of three different percentages of gross revenues allocated to each business line. Both these approaches use an average of the last three financial years' revenues. Finally, the Advanced Measurement Approach, is based on an internally developed risk measurement framework that prescribes the use of (i) Internal loss data (ILD), (ii) External data (ED), (iii) Scenario analysis, and Business environment and internal control factors.

The Company applies the basic indicator approach in determining its operational risk.

In order to ensure that CTC's operational risk does not exceed expected tolerance levels due to the increased volumes detailed in the three year business plan, CTC undertakes the following actions:

- Ongoing implementation of CTC's ERM solution allows for the monitoring of all types of risks and controls;
- Ongoing implementation of an Operational Risk Framework and Policy;
- Ongoing implementation of a Vendor Management Committee;
- Updating the IT internal control framework and comprehensively documenting IT policies, guidelines and procedures; and
- Revisions, testing and updates to CTC's Business Continuity Plan and Disaster Recovery Plan to reflect updated Recovery Time and Recovery Point objectives derived from company-wide Business Impact Analysis.

CTC uses the Basel Basic Indicator Approach to assess Operational Risk capital requirements.

While operational risk can be monitored and minimized through a sound internal control structure, CTC recognizes that this risk can never be fully eliminated, as such, Management has internally identified its operational risk exposures in its ICAAP. This additional capital covers the additional risk surrounding new IT system implementation risk and cyber risk.

Securitization Risk

Securitization Risk is the risk of credit related losses greater than expected due to a securitization failing to operate as anticipated, or of the values and risks accepted or transferred, not emerging as expected.

CTC is an active issuer in the MBS and CMB programs. As an issuer the Company generates or acquires mortgage products that are CMHC insured and arranges for the pooling of such mortgages into MBS that also carry a Government of Canada guarantee. The Company utilizes a servicing agent that collect mortgage payments monthly and then distribute principal amounts collected and interest payable on the security.

CTC purchases and sells third party originated CMHC Mortgages in order to manage credit risk and improve capital ratios, as well as to generate liquidity and income for the Company.

Through the program, CTC issues securities backed by multi-family residential mortgages that are insured against borrowers' default. Once the mortgages are securitized, CTC assigns underlying mortgages to CMHC. As an issuer of MBS, CTC is responsible for advancing all scheduled principal and interest payments to CMHC, including transfer or payment in the event the amounts have not been collected on the underlying mortgages, and then recovers these amounts from the borrower.

The sale of mortgages under the above programs results in derecognition of the mortgages under IFRS accounting standards, as CTC does not retain the prepayment and interest rate risk associated with the mortgages. Which represents transfer of significant risk and rewards associated with the transferred assets. A derecognized amount is retained on the Balance Sheet to reflect this substantial transfer or risk and rewards relative to the size of the underlying mortgage pools.

The following are the Company’s positions held on its securitized assets and liabilities:

$ 000’s	Jun-30 2016	Sep-30 2016	Dec-31 2016	Mar-31 2017
Carrying amount of mortgages securitized and sold	557,992	726,202	958,252	1,219,612
Carrying value of securitization retained interests	17,344	23,017	28,678	35,300
Fair value of derivative assets	6,082	8,725	12,624	16,554
Fair value of derivative liabilities	6,082	8,725	12,624	16,554
Net position on derivatives	-	-	-	-

Equity Risk

The Company’s equity risk is driven by market factors impacting the value of the Securities Investment Portfolio (“Portfolio”), such as, but not limited to movements in; foreign exchange, commodity prices, interest rates, credit spread and equity prices that may negatively impact the income or the value of the underlying Portfolio.

The risk relating to the Portfolio is the uncertainty associated with the valuation of assets arising from changes in equity markets. The portfolio is intended to be held for a longer term to provide both income and capital appreciation. In recognition of the higher market risk associated with this portfolio the company has established higher return objectives. CTC restricts the total Portfolio to 60% of its regulatory capital. In accordance with policy, CTC utilizes loss mitigation strategies to prevent any potential negative effects that would otherwise result in loss of capital.

Effective Q1-2016, CTC disposed of the positions in its Securities Investment Portfolio and has not since reinvested in this portfolio.

The Board of Directors monitors total capital against all material risks identified with respect to the Company’s business lines. Through the internal governance processes, the Company’s senior management is responsible for the investment and capital allocation decisions and assessments, and ensures that returns on investment are adequate after taking account of capital (capital vs. risk) requirements.

Interest Rate Risk

The Company's operating margin is primarily derived from the spread between interest earned on the mortgage portfolio and the interest paid on the debt and deposits used to fund the portfolio. Mortgages have various interest rate reset terms, ranging from variable to five-year.

The Company's Asset Liability and Capital Committee is responsible for monitoring, managing and reporting interest rate risk in accordance with Board approved policies. Compliance with various internal limits for net interest income and market value sensitivities are reported to the Risk Review Committee which has the oversight responsibility for risk practices.

The Company is exposed to interest rate risk as a result of the mismatch, or gap, between the maturity or reprising date of interest sensitive assets and liabilities. The following table identifies the Company's assets and liabilities which are sensitive to interest rate movements and those which are non-interest rate sensitive.

Interest Sensitive and Non-Sensitive Asset and Liabilities				
$ 000's	Jun-30 2016	Sep-30 2016	Dec-31 2016	Mar-31 2017
Interest sensitive				
Total assets	511,803	601,276	672,042	790,350
Total liabilities and equity	477,794	556,272	628,662	752,187
Total interest rate sensitivity gap	34,009	45,004	43,380	38,163
Non-interest sensitive				
Total assets	35,762	44,078	56,976	64,257
Total liabilities and equity	69,771	89,082	100,356	102,420
Total interest rate sensitivity gap	(34,009)	(45,004)	(43,380)	(38,163)

Interest rate sensitivity

The following table provides the potential before-tax impact of an immediate and sustained 100 bps increase or decrease in interest rates on Net income. These sensitivities are hypothetical and should be used with caution.

BPS Increases and Decreases				
$ 000's	Jun-30 2016	Sep-30 2016	Dec-31 2016	Mar-31 2017
Before-tax impact on Net income of:				
100 bps increase in interest rates	588	833	882	1,459
100 bps decrease in interest rates	(588)	(833)	(882)	(1,459)
300 bps increase in interest rates	1,764	2,498	2,646	4,376
300 bps decrease in interest rates	(1,764)	(2,498)	(2,646)	(4,376)

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Additional disclosures

OSFI B-20 Guideline
The Company discloses information in respect of its residential mortgage portfolio in accordance with the OSFI B-20 Residential Mortgage Underwriting Practices and Procedures Guideline, November 2014. The Company also discloses, in accordance with Capital Disclosure requirements of OSFI, the main features of its regulatory capital instruments. Both of these additional disclosures can be found on the Company's website at www.communitytrust.ca.

Remuneration
CTC is subject to data protection legislation when disclosing remuneration information. The Personal Information Protection and Electronic Documents Act prohibits disclosing information that may result in individual information being easily identifiable. Remuneration disclosures are therefore made on a limited basis in terms of any public or company-wide circulation. All necessary information will be made available to OSFI upon request.

The Company's Conduct Review and Compensation Committee is responsible for oversight of the compensation pertaining to senior management, with ultimate responsibility borne by the Board. The Company's Compensation Management Policy outlines the principles to which the Board ensures alignment to. These principles are aligned with the Financial Stability Board's Principles for Sound Compensation Practices.

The Compensation Management Policy outlines the requirements for remuneration packages to be consistent within its business strategy, current financial condition, and long term growth objectives.

The Company's compensation structure is based on a combination of fixed pay (salary and benefits) and performance related incentives linked to company-wide measures, as well as the seniority and nature of an individual's employment. Performance measurements used to calculate variable remuneration are therefore adjusted to take into account current or potential risks to the Company, and are consistent with the need to retain a strong capital base.

For the year ended 2016, the total amount of all salaries, bonuses and long term incentives and other remuneration for key management employees whose actions have a material impact on the risk exposure of the Company was $1.5 million.

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Appendix 1 – Basel III Capital Disclosures – March 31, 2017

(in thousands of Canadian dollars, except %)

	Regulatory Capital and Ratios	**All-in**	**Transitional**
Common Equity Tier 1 capital: instruments and reserves			
1	Directly issued qualifying common share capital (and equivalent for non-joint stock companies) plus related stock surplus	25,385	
2	Retained earnings	29,416	
3	Accumulated other comprehensive income (and other reserves)		
4	*Directly issued capital subject to phase out from CET1 (only applicable to non-joint stock companies)*		
5	Common share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)		
6	**Common Equity Tier 1 capital before regulatory adjustments**	54,801	
Common Equity Tier 1 capital: regulatory adjustments			
28	Total regulatory adjustments to Common Equity Tier 1	(1,108)	
29	**Common Equity Tier 1 capital (CET1)**	53,693	53,914
Additional Tier 1 capital: instruments			
30	Directly issued qualifying Additional Tier 1 instruments plus related stock surplus	12,997	
31	of which: classified as equity under applicable accounting standards		
32	of which: classified as liabilities under applicable accounting standards		
33	*Directly issued capital instruments subject to phase out from Additional Tier 1*		
34	Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group AT1)		
35	*of which: instruments issued by subsidiaries subject to phase out*		
36	**Additional Tier 1 capital before regulatory adjustments**	12,997	
Additional Tier 1 capital: regulatory adjustments			
43	**Total regulatory adjustments to Additional Tier 1 capital**		
44	**Additional Tier 1 capital (AT1)**	12,997	
45	**Tier 1 capital (T1 = CET1 + AT1)**	66,690	66,911
Tier 2 capital: instruments and allowances			
46	Directly issued qualifying Tier 2 instruments plus related stock surplus		
47	*Directly issued capital instruments subject to phase out from Tier 2*		
48	Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group Tier 2)		
49	*of which: instruments issued by subsidiaries subject to phase out*		
50	Collective allowances		
51	**Tier 2 capital before regulatory adjustments**		
Tier 2 capital: regulatory adjustments			
57	**Total regulatory adjustments to Tier 2 capital**		
58	**Tier 2 capital (T2)**		
59	**Total capital (TC = T1 + T2)**	66,690	66,911
60	**Total risk-weighted assets**	471,735	471,964

Capital Ratios			
61	Common Equity Tier 1 (as percentage of risk-weighted assets)	11.38%	11.42%
62	Tier 1 (as percentage of risk-weighted assets)	14.14%	14.18%
63	Total capital (as percentage of risk-weighted assets)	14.14%	14.18%
OSFI all-in target			
69	Common Equity Tier 1 capital all-in target ratio	7.00%	
70	Tier 1 capital all-in target ratio	8.50%	
71	Total capital all-in target ratio	10.50%	
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2013 and 1 Jan 2022)			
80	*Current cap on CET1 instruments subject to phase out arrangements*		
81	*Amounts excluded from CET1 due to cap (excess over cap after redemptions and maturities)*		
82	*Current cap on AT1 instruments subject to phase out arrangements*		
83	*Amounts excluded from AT1 due to cap (excess over cap after redemptions and maturities)*		
84	*Current cap on T2 instruments subject to phase out arrangements*		
85	*Amounts excluded from T2 due to cap (excess over cap after redemptions and maturities)*		

Appendix 2 – BCBS Leverage Ratio Disclosures – March 31, 2017

(in thousands of Canadian dollars, except %)

Leverage Ratio Common Disclosure		
	Item	**Leverage Ratio Framework**
On-balance sheet exposures		
1	On-balance sheet items (excluding derivative and SFTs, but including collateral)	841,234
2	(Assets amounts deducting determining Basel III Tier 1 Capital)	(1,107)
3	**Total on-balance sheet exposures** (excluding derivative and SFTs) (sum of lines 1 and 2)	840,127
Derivative exposures		
4	Replacement cost associated with all derivatives transactions (ie net of eligible cash variation margin)	31,439
5	Add-on amounts for PFE associated with all derivatives transactions	
6	Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the operative accounting framework	
7	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	
8	(Exempted CCP leg of client-cleared trade exposures)	
9	Adjusted effective notional amount of written credit derivatives	
10	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	
11	**Total derivative exposures (sum of lines 4 to 10)**	31,439
Securities financing transaction exposures		
12	Gross SFT assets (with no recognition of netting), after adjusting for sale accounting transactions	
13	(Netted amounts of cash payables and cash receivables of gross SFT assets)	
14	CCR exposure for SFT assets	
15	Agent transaction exposures	
16	**Total securities financing transaction exposures (sum of lines 12 to 15)**	
Other off-balance sheet exposures		
17	Off-balance sheet exposure at gross notional amount	39,441
18	(Adjustments for conversion to credit equivalent amounts)	(30,461)
19	**Off-balance sheet items (sum of lines 17 and 18)**	8,980
Capital and total exposures		
20	**Tier 1 capital**	66,690
21	**Total exposures (sum of lines 3, 11, 16 and 19)**	880,546
Leverage ratio		
22	**Basel III leverage ratio**	7.57%