

Dynamics of Accounting Theory and Practice: Accounting Issues of Loan Loss Provisioning and Measurements of Financial Instruments of Nigeria Quoted Banks

Odoemelam Ndubuisi

Department of Accounting, Faculty of Business Administration

University of Nigeria Nsukka

Email: endy_doc@yahoo.com

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Abstract

This research examines the changes in theory and practice of loan loss provisioning (LLPs) under IFRS and CBN prudential guideline and banks classification and measurement of financial instruments in the balance sheet by listed Deposit Money Banks (DMBs) in Nigeria. Data were drawn for a period of six years (2010-2015) post –IFRS. The data were analyzed using simple percentages, graph and tables to empirically investigate the difference between the IFRS and CBN provisioning models. Banks were grouped into two, the too-big-to- fail banks and smaller- banks. The findings, i observed that both groups adopt mixed attribute accounting (MAA) model in classifying and measuring financial securities and that the dynamic forward looking LLPs that will replace IAS 39 is a right decision by standard setters. Analysis of the data showed a clear stand of IASB and CBN, while the former emphasize on transparency the later is interested on stability of the financial industry. The study recommended that accounting principles and rules should be harmonized to reduce diversities of professional judgment and discretion in financial reporting. There should be synergy between the regulators and accounting standard setters (CBN and IASB). The stability of the financial system and providing faithful and relevant information to investors and other segments of the society should be a paramount objective of the two bodies and preparers of financial statements.

Keywords: Loan loss provisions, Assets, IFRS, CBN, Deposit money bank, Nigeria.

1. Introduction

Economic instability, corruption, corporate collapses, fraud, investor uncertainty, transparency and sustainability are today driving a number of accounting issues that call to question accounting theories and practices with regard to the value and appropriateness of traditional and modern accounting thinking and structures. The published financial statements of entities worldwide should stand in as ‘financial bible’ that communicates information about the entity’s economic resources and claims to those resources and changes in those resources and claims (Kieso *et al*, 2010). This relevant and faithful information as represented will aid the end users to make informed economic decisions (Glautier *et al*, 2011). Investors have been misled by some financial information contained in various entities’ financial statements. Ezejelue (2004) stated “ that the purpose of accounting should not be to deceive but to show truthful and reliable balance sheet values that will harmonize with economic reality so as to exhibit the real net worth and enable a time and reliable income statement to be presented”. The cases of Enron Corporation, Washington Mutual Bank in September 2008, Royal Bank of Scotland Group Plc and Arthur Anderson Accounting firm are few examples of fraudulent financial reporting in other countries of the world. In Nigeria, there are quite a number of cases of misinforming the investors and other segments of the society about the financial positions of entities that are involved. For instance, Intercontinental bank plc, Oceanic bank plc and Afribank plc were alleged of manipulating their financial statements. In the case of Intercontinental and Oceanic banks, the loan loss provisions as per Central Bank of Nigeria (CBN) were 278.2 billion naira and 210.9 billion naira as against 36 billion and 16.6 billion naira as per audited accounts respectively. Afribank draft accounts indicated a loss of 6.9 billion naira while 2.94 billion naira was reported (Olusanya 2010 and Oni 2007 cited Angahar, 2012). It is as a result of these challenges and the dynamic nature of the environment facing financial reporting and management that accounting theories and practices evolve in search of solution to the real world accounting problems. According to Kieso *et al* (2010) “accounting theory and practice have always evolved and will continue to evolve”. Therefore, as long as accounting theory and practice evolve based on trial and error, there will always be problems to be solved by standard setters and theories are bound to change.

Theories always try to explain with reason, the logic underlying a particular practice. As noted by Wall and Koch (2008) at least three different philosophies on loan loss accounting exist. They are economist’s view, FASB’s view and the capital view. The economist viewed loan loss allowance as the provision intended to capture future losses that will occur if borrowers default. While Financial Accounting Standard Board’s view is the measurement of a firm’s net income over a given period, on the other hand the capital view sees loan loss allowance as an element of capital.

Blaanw (2009) stated that initially accountants were in agreement with regulators favoured system of loan loss provisioning based on expected losses. But accounting standard setters finally accepted an incurred loss based methodology when the standard became effective in 2005. Blaanw (2009) further noted “not all countries, however followed the incurred loss approach. The Spanish regulator for example adopted a dynamic provisioning framework

based on expected loss” that Spanish was able to withstand the global financial meltdown of 2008 (Blaanw, 2009).

Accounting for loan loss has been an issue over the years. The paragraph 59 of Financial Accounting Standard No. 5 stated it clearly that loan loss provision should be based on incurred loss reflecting events that happened within the financial year. In Nigeria, today, according to CBN (2013) provisions under prudential guidelines are determined using the time base provisioning prescribed by the Revised Central Bank of Nigeria (CBN) in 2010. Under the IFRS Model, credit impairment is measured using the provisions of IAS 39 which requires fair value for financial instruments other loans and receivables that are not held for trading, securities held to maturity and qualifying hedges. This treatment of loan loss accounting has generated much debate with its front liners US GAAP and UK IFRS standard setters. To overcome the challenges of IAS 39, loan loss provision is to be based on expected loss model-IFRS 9. Nigerian banks are yet to use the IFRS expected loss model. Therefore the banks in Nigeria are required to comply with the following:

- a) Provision for loans recognized in the profit and loss account should be determined based on the requirements of IFRS. That IFRS provision should be compared with provisions determined under prudential guidelines and the expected impact changes in general reserve should be treated as follow:
 - (i) Prudential provisions is greater than IFRS provisions; the excess provision resulting should be transferred from general reserve account to a regulatory risk reserve.
 - (ii) Prudential provision is less than IFRS; IFRS determined provision is charged to the statement of comprehensive income. The cumulative balance in the regulatory risk reserve thereafter reversed to the general reserve account.
- b) The non –distributable reserve should be classified under Tier 1 as part of the core capital(UBA Annual Report 2012 and CBN, 2013)

On the issue of financial instruments (Assets) Elmeraji (2008) noted that “certain type or securities (like level 3 assets) discretion plays a big part to what you see on a company’s books”. Laux and Lenz (2000) argued that after all, the biggest position on the bank balance sheets (financial position). The held-for- investment loan portfolio is not subject to a fair value according on both balance sheet or income statement and that it is subject to weaker impairment standards.

Previous surveys and empirical analysis have explored the issues from the perspective of earnings and capital management. These studies estimated the amount of the loan- loss provisions required to cover – expected loss and treat the remaining provision as what is called discretionary loan – loss provision. In their various studies, they found that banks use loan loss accounting to manage capital and earning (Collins, Shackelford and Wahlen 1995 Moyer 1990; Ahmed et al 1999; Breathy, Chamberlin and Maylolo, 1995; Ahmed et al 2014 and Ozili 2014). On the other hand Okaro and Okafor (2013) in their study on fair value accounting and loan loss provisioning – early evidence from Nigeria banking industry, agreed that fair value allow banks to increase their leverage in periods of boom and the expectation

why CBN revised prudential guideline of 2010, that banks abuse loan loss provisioning and was bound to produce more aggressive figures as loan loss provision.

Therefore, based on this background, the objective of this study is to examine the dynamic theories and practices of loan loss approving and measurements of financial securities (assets) of quoted banks in Nigeria.

1.1. Statement of Problem

According to Katudu (2008) the all-important duty of measuring and disclosing information obligation in line with accounting standards has been a subject of debate and controversy in recent years. Taking cognizance of the crumbling and demise of companies like worldcom Inc, Enron, Washington mutual bank, Oceanic bank of Nigeria, Intercontinental bank Plc, Afri bank of Nigeria and host of other renowned accounting firms indicted for not carrying out their duties in a professional manner. In the words of Kerr (2013) “the potential misreporting involved is significant. UK bank, Royal Bank of Scotland Group Plc, I and other calculated that IFRS rules resulted in the bank understating its 2011 losses by 19.5 billion pounds”. The IFRS model of loan loss provisioning presently in use has raised many issues, Kerr (2013) noted that official of IASB has acknowledged the problem, saying that banks should maintain two profits calculations, one for reporting to shareholders, and the other not following IFRS rules to determine distribution to shareholders. He questioned this idea that it is false accounting

1.2. Objectives of the Study

The objective of this study is to provide empirical evidence of loan loss models of both incurred and expected, this also examined the accounting treatment of financial instruments (assets) of quoted banks in Nigeria. To achieve the purpose of the study the following objectives and pursued.

1. To determine the difference between CBN Expected loss model and IFRS incurred model of quoted banks.
2. To express the difference between the CBN Expected loss model and IFRS incurred loan loss model as a percentage of the Tier 1 capital of quoted banks in Nigeria.
3. To ascertain the difference in application of these expected and incurred loan loss models by too – Bib. To fail banks and small banks quoted in Nigeria stock market,
4. To examine the key assets on the financial positions of Nigeria banks as a fraction of their total assets.

1.3. Significant of the Study

This study contributes to the accounting literature which suggests that managers and accountants have various incentives for choosing and influencing some accounting numbers, in this case loan loss accounting, fair value accounting, historical cost accounting and mixed attribute accounting model for financial instrument. The findings of this research will be relevant to current concerns of accounting standard setters and bank regulators on the current

model of loan loss provisioning.

1.4. Scope of the Study / Limitation

The theoretical area to be covered in the study is restricted to literature on loan loss accounting and accounting treatment of financial instruments. The study was based on listed banks in Nigeria that have adopted IFRS between 2010-2015. The research is subject to a number of limitations. The study is limited to the money deposit banks (MDB) in Nigeria banking sector. Few banks not been able to release their financial report up to December, 2015 (i.e. Diamond, FBN).

2. Theoretical / Conceptual Framework

In the introductory part of the study, we noted that theory and practice of accounting evolve by error and trial. This implies that accounting theory and practice are changing in line with dynamic nature of the environment. Bank for international settlements is strongly in support of IASB to change the present incurred loss provisioning to expected loss approach (BIS, 2010). Andrew (2014) lends his view and support to expected loss provisioning, said that under the current international accounting standards provisions are based on incurred risks than expected losses. He stated that implementation of the new accounting standard for provisioning, IFRS9 is a step in this direction.” To buttress the point why loan loss forward looking provisioning is preferred to backward looking loan loss provisioning, Beatty (2009) noted that backward looking loan loss provisioning will lead to an increase in the required provision during economic downturn. He further said, this increase in the loan provision will decrease bank’s reported income and their Tier 1 regulatory capitals. The practice of accounting worldwide is guided by set of rules, customs and conventions (Ezejelue, 2004). These rules and guidelines are compiled into accounting standards. Two set of bodies govern the accounting practice in Nigeria. They are:

1. Financial Reporting Council (FRS) that replaced Nigeria Accounting Standard Board (NASB).
2. International financial Reporting Standards (IFRS) which are issued by the International Accounting Standard Board (IASB).

2.1. Theory of the Firm

Some scholars have questioned that many underlying theories of accounting are by other scholars from other disciplines. One of such theories is the theory of the firm which is potentially relevance in discussing accounting issues. For instance, questions of measurement in financial reporting. ICAEW (2010) in their study titled “business models in accounting, the theory of the firm and financial reporting information for better market initiative”, acknowledged that it is difficult to make a direct connection between the theory of the firm and accounting measurements, but they “ argue that one way of relating the two to each other is via firm’s business models” ICAEW (2010) stated that “assumptions about business models have always been the case that different business will account for the same asset in different ways depending on what its role is within the firm’s business model. This is not far

from the views of Laux and Lenz (2010) and Doron and Stephen (2008). ICAEW (2010) further stated that historical cost and fair value accountings are among other approaches of reflecting firm's models. In the study, ICAEW categorically stated that it is "impossible to devise a sensible approach to financial reporting measurement that does not reflect firm's business models".

2.2 Concept of Historical (Original) Cost Accounting

Trueblood Committee in its report in 1973 suggested seven qualitative characteristics of financial statement which includes: relevance and materiality, form and substance, reliability, freedom from bias, comparability, consistency and understanding (Enahoro and Jayeoba, 2013).

Historical cost accounting (HCA) records assets and liabilities on a firm's balance sheet at original cost (which in the beginning should be equivalent to fair value). These assets and liabilities are been amortized to reflect passage of time. HCA is interested in recording realized cash flows to measure to measure changes in the financial condition of the firm. According to Richard most financial institutions prefer HCA to FVA because it provides them with considerable flexibility over the timing of the recognition of gains and losses (<http://fic.wharton.upenn.edu/fic/papers/11/11-72.pdf>).

Generally Accepted Accounting Principle (GAAP) requires that most assets and liabilities be accounted for and reported on the basis of acquisition price. This method often referred as historical cost principle has an advantage over other valuations. The advocates of this method said it is reliable. Users of historical cost accounting have indicated a preference for it because it provides them a stable and consistent benchmark that can be relied upon to measure historical trend. HCA recognizes gains and losses only when actually realized.

In the 1980, accounting standard setters began to shift away from this approach in part due to concerns that the combination of historical results disconnected from economic reality (Shaffer, 2011). Those against historical cost are of the opinion that it encourages managers to smooth profits through hidden, excess reserves and selective sales of securities. Also the fact that historical cost was proving to be a poor measurement approach in inflationary markets for instance, new financial products such as derivatives and structured investments simply could not be measured in a meaningful way using traditional approach (Shaffer 2011)

2.3. Concept of Fair Value Accounting

Fair value accounting focuses on the price that would be received to sell the asset or paid to transfer the liability (an exit price) not the price that would be paid to acquire the asset or received to assume liability (an entry price) (Oxford Dictionary of Accounting 2005). Many of Nigeria banks have started reporting their financial statement based on international Financial Reporting Standards (IFRS). Financial Reporting Council of Nigeria (FRC), the body that is saddled with the responsibility of setting accounting Standards in Nigeria, approved the adoption of IFRS through the Federal Executive Council (FEC) in September, 2010. Implication of the adoption of IFRS is the use of fair value accounting. This new wave of fair value accounting though been criticized by many has gained much disciples (Rock,

Elena and Sarlat, 2009)

Bob Herz, FASB's chairman carrying the "gospel of fair value accounting argues that fair value is "essential to provide transparency for investors (Kambayashi, 2008). The Nigerian Standard setters, FRC has joined the " league of fair value accounting as America's Financial Accounting Board (FASB) and London- based International Accounting Standards Board (IASB) have not budged an inch to drop it. In the same vain, Financial Reporting Council of Nigeria (FRC) sees fair value accounting as an essential guidance that will enhance financial statement reliability (Bala and Hope 2014). But FASB and IASB defense is that enhancing financial stability is not the purpose of accounting (Kambayashi 2008 and Lionel et al, 2008). If the standards setters are correct, the first question that critics ask is what then is the role of accounting?

2.4. The role of Accounting

Lionel et al (2008) exploring the ignorance of the main issue about fair value accounting, maintained that accounting has a role as a source of information, removing this information that fair value account provides on the pretext of lessening the procyclality of accounting would reduce transparency and deepen the crisis of confidence. The second question posed by the critics of fair value is how to value illiquid (and sometimes unique assets). A common solution is to use bank's own models. It is worrisome that there is no streamlined method of valuation. Ezejelue (2004) stated that "accounting exists in a world of uncertainties and alternative methods". He further stated that "this makes financial statements not only flexible but also reliable for some purposes and unreliable for others". This assertion confirms the concerned of investors as noted by Kambayashi (2008) "but some investors are concerned that this gives banks' managers too much discretion and no wonder, because highly illiquid (or "level 3") assets are worryingly large relative to many bank shrunken market values" he further noted that it may not be possible to find a generally acceptable method. It is very obvious that lack of acceptable method or single consistent framework for applying fair value measurements and developing a reliable estimate of fair value in the absence of quoted prices have created inconsistencies and incompatibility . Entity's (Bank) today based on the theory of the firms that is linked to business model determines the treatment of financial assets based on its intention. Contributing to this Ezejelue (2004) stated that the choice is visually that of the manager or the accountant or both. Based on the policies of and the pressures on, the bank management may adopt methods, which will render the financial statement aggressive, or conservative, or liberal "these issues call for urgent guidance by IASB to come up with a well acceptable framework or standard that can be used in fair value measurement.

2.5. Classification and fair value of Assets and Liability

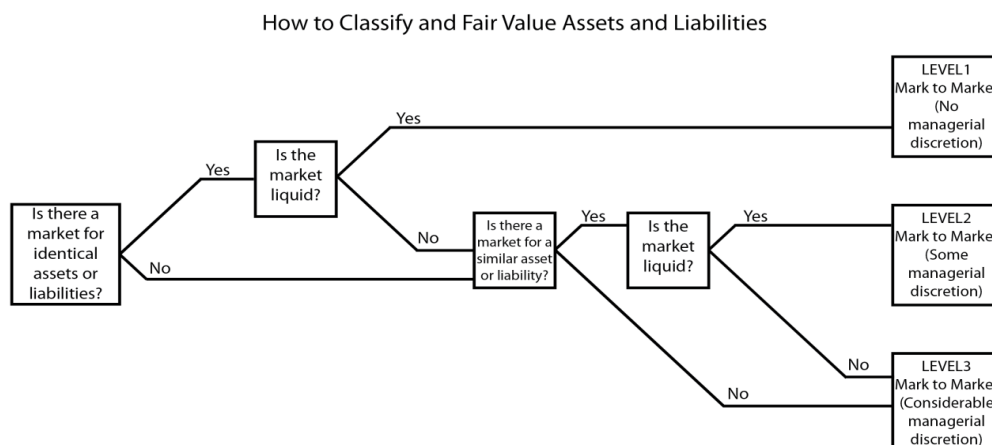
The most widely used method of classification of assets and liabilities as observed from the financial statements of banks in Nigeria show a combination of HCA and FVA, which result to mixed-Attribute Accounting (MAA). See table 1 figure 1 and table below.

Classification of Assets	Disclosure of Value Assets and Liabilities of Balance sheet	Inclusion of A fair Value in reported Earning	Regulatory Capital
Held-to-Maturity Securities (Debt securities that firm has positive intent and ability to hold to maturity.)	At amortized cost fair value may be disclosed in footnote to financial statement	Only if judged impaired (or sold for value other than amortized cost	Unrealized losses affect regulatory capital only the case of a permanent impairment
Trading Securities (Debt and equity bought and held principally for purpose of trading in near term.)	At fair value. Changes in value affect equity	Unrealized gains & losses affect earnings and income	Unrealized gains and losses affect regulatory capital
Available-for-sale Securities (The residual-not classified as held-to – maturity or trading securities)	At fair value changes in fair value recorded in Accumulated other Comprehensive income	Excluded from earnings, but reported in a special account, other Comprehensive Income.	Unrealized losses affect regulatory capital only in the event of permanent impairment

Table 1: Classification of Assets and Associated Accounting Principles

Source: Adopted from R. J. Herring (<http://fic.wharton.upenn.edu/fic/papers/11/11-72.pdf>)

Figure 1



Source: Adopted from R.J.Herring (<http://fic.wharton.upenn.edu/fic/papers/11/11-72.pdf>)

From the above figure, bank classifies and value their assets based on their intention best known to them (discretion).

Held-to-Maturity (HTM): If bank has the intention of holding a security to maturity, “it may value the asset on its balance sheet using HCA”. The amortized cost will be reflected on the balance sheet although the fair value may be disclosed in a footnote. When assets is determined to be impaired permanently the change in fair value is reported in the income statement. “Unrealized losses affect regulatory capital only in the case in which the asset is deemed to be permanently impaired”. (<http://fic.wharton.upenn.edu/fic/papers/11/11-72.pdf>)

Held –for-Trading (HFT): Assets held principally for the purpose of trading in the near term are classified as trading securities and must be fair value. Change in fair value- whether realized or not – are disclosed in the income statement and affect the value of equity. In this instance unrealized gains and losses affect regulatory capital. (<http://fic.wharton.upenn.edu/fic/papers/11/11-72.pdf>)

Available-for-Sale (AFS): The third category, available –for-sale, is the residual assets that are not classified as held-to-maturity or trading securities. The treatment of this category is a bit complicated. Although the assets are recorded on the balance sheet at fair value, unrealized changes in fair value are excluded from the income statement instead they are recorded in a special account, “other comprehensive income” and reported on the balance sheet as “accumulated other comprehensive income”. Unrealized losses affect regulatory capital only in the event that an asset is deemed permanently impaired (Garcia-Feijoo, 2009)

Mixed-Attribute Accounting: Mixed- attribute accounting model for financial instruments allows banks choose the measurement they desire for a position through how they classify the position. For example, under FASB 115 a firm may choose to classify a security as any one of trading, available for sale or held-to-maturity and thereby obtain one of three different accounting treatments (Ryan, 2008).

2.6. Incurred Loan Loss Provisioning Vs Expedited Loan Loss Provisioning

According to IAS 39, impairment losses are incurred if there is objective evidence of impairment as a result of one or more events that occurred. This requires fair value for financial instruments. Other than loans and receivables that are not held for trading, securities held to maturity, and qualifying hedges. Baauw (2009) in his view incurred loss and expected loss based provisioning, favored the later by calling on Nigeria regulatory authorities to adopt a dynamic loan loss provisioning model based on the expected loss model irrespective of the loan loss provisioning model adopted by IFRS. According to him, Spain was spared of the economic meltdown because she chose not to follow incurred base model. He further stated that caution should be exercised in using the international Financial Reporting Standards (IFRS) loan loss provisioning model for internal decision making. Okafor and Okaro (2013) investigating the loan loss provisioning under International Financial Reporting Standards (IFRS) and Nigeria prudential guidelines documented evidence of a huge difference between the two standards and advised that CBN may wish to retain its loan loss provisioning model.

2.7. Empirical Review

Brad *et al* (2010) examined a sample of 150 bank holding companies with large portfolios on non-treasury AFS and HTM securities. They conducted industry and firm level analyses and found firstly, no support for claims that fair value provisions of US accounting rules significantly depleted regulatory capital or caused pro-cyclical selling of securities. That the impact was insignificant to conclude that fair value caused the problem. Secondly, they found no evidence to support the claim that fair value losses caused ‘fire-sales of assets’. In Ghana and Zambia, fair value accounting has not been in existence without flaws. Zori (2011) and Mwape (2010) both noted that determination, valuation rules and loan loss instruments are easily manipulated due to inherent assumptions associated with fair value accounting. Ahmed *et al* (2014) identified that bank manager not only use fair value accounting manage capital requirement, loan loss provisioning is also used in managing both reported earnings and capital, Ahmed *et al* (1999), Beaty *et al* (1995) and Ahmed *et al* (2014) find a positive relationship between loan loss provision and regulatory capital, management exercises discretion over its provision. Akenbor and Ibanichuka (2012) in their study which aimed at empirically investigating creative accounting practices in Nigerian banking industry, using primary data, agreed with Osisoma and Enahoro (2006) who revealed that accounting based, principles and processes should be streamlined in order to reduce diversions of human judgments on accounting issues.

3. Methodology

3.1. Research Design

This study adopts an ex-post facto research design because the events have taken place and the data are already in existence. Tables, graphs and percentage analyses are used to investigate theoretical and practices of loan loss provisions and measurement of financial instruments in Nigerian banking industry.

3.2. Population for the Study

The population of the study consists of all the 21 Deposit Money Banks (DMBs) in Nigeria as at 31st December 2015 (CBN, 2015). This comprises banks designated as ‘too-big-to-fail’ or Systematically Important Banks (SIBs) and others (smaller) banks. (www.vanguardngr.com/2014/09/tough-times-ahead-nigeria-bank-investors)

3.3. Sample and Sampling Technique

The sample of this study is drawn from listed deposit money banks in the Nigerian Stock Exchange (NSE). The sample consists of 13 banks whose data for the study period 6years, which is 2010 to 2015, are available. I pooled data of 78 banks-year observation of post-IFRS (2010-2015) period, this to enable us carry out both percentage analysis of accounting choices in treating financial instruments as well as their compliance to IFRS rule and CBN prudential guideline on loan loss provisioning. This period, Nigerian banks adopted IFRS and embracing regulators guiding polices. Sample bank inclusion criteria are shown at a glance on **appendix 1** which includes:

- i) Bank must be in existence on or before 2010-2015
- ii) Bank is listed on Nigeria Securities Exchange (NSE)
- iii) Bank voluntarily adopted IFRS reporting
- iv) Only Deposit Money Banks (DMBs) is included, this to ensure that sample banks face homogenous investment activities and financing methods. (Ozil, 2014)
- v) To be included, bank must have complete data up to 30th September or December, 2015, otherwise it is excluded.

The sample from the population was grouped into two based on their assets and equity level as at 2015 financial year. The first group, too-big-to-fail banks (TBTF-banks) (assets >1.5 trillion naira and equity >230 billion naira), the second group is smaller banks (S-banks) (assets < 1.5 trillion and equity <230 billion naira). The nature of data for the study will be secondary source. Financial data will be extracted from the published financial statements and reports of the selected studied sample banks. The data for the study will cover a period of 6 years from 2010-2015.

4. Results and Discussions

This section of the study examines the results and discussions of relevant findings from the percentages analysis.

YEAR	HELD-TO-MATURITY (HTM) (N'000)	HELD-TO-TRADING (HFT) (N'000)	AVAILABLE-FOR-SALE (AFS) (N'000)	LOAN AND ADVANCES TO CUSTOMER(LA) (N'000)	TOTAL ASSETS (TA) (N'000)
2010	124,240,556.20	29,362,995	68,035,826.60	490,491,899.20	1,416,716,479.0
2011	278,343,127.80	31,132,941	86,154,126.60	785,826,126.80	1,752,198,128.0
2012	170,679,372.20	63,894,923	80,620,745.00	820,188,239.80	2,055,339,333.7
2013	140,908,166.20	3,513,724	188,103,614.40	1,016,285,567.00	2,364,535,962.0
2014	73,676,401.60	3,206,509	203,468,830.60	1,292,237,344.40	2,372,422,648.0
2015	81,746,600.00	8,909,923	170,302,168.60	1,350,237,950.40	2,821,269,857.0

Table 2 Figures and Averages of Six Years Summary of Held-to-Maturity, Held-for-Trading, Available-for-Sale Financial Instruments and Total Assets Obtained From the Five (5) Too-Big-To-Fail Banks of Study Sample

Sources: Computation from Published Annual Reports and Financial Statements (2010-2015)

YEAR	HELD-TO-MATURITY (HTM) (N'000)	HELD-TO-TRADING (HFT) (N'000)	AVAILABLE-FOR-SALE (AFS) (N'000)	LOAN AND ADVANCES TO CUSTOMER(LAC) (N'000)	TOTAL ASSETS (TA) (N'000)
2010	13,395,845.50	991,260.00	11,822,246.38	163,512,564.25	395,674,799.34
2011	44,132,113.75	15,994,951.25	68,826,015.38	220,146,851.25	626,542,812.75
2012	52,848,718.63	53,947,262.00	53,008,542.38	292,019,819.38	758,425,121.63
2013	99,418,342.99	40,247,230.25	37,398,344.75	346,750,268.50	868,306,852.13
2014	57,288,612.63	11,448,432.38	59,159,276.88	622,593,870.38	802,809,284.00
2015	28,262,612.50	1,095,329.50	104,030,485.75	538,140,302.13	553,384,466.38

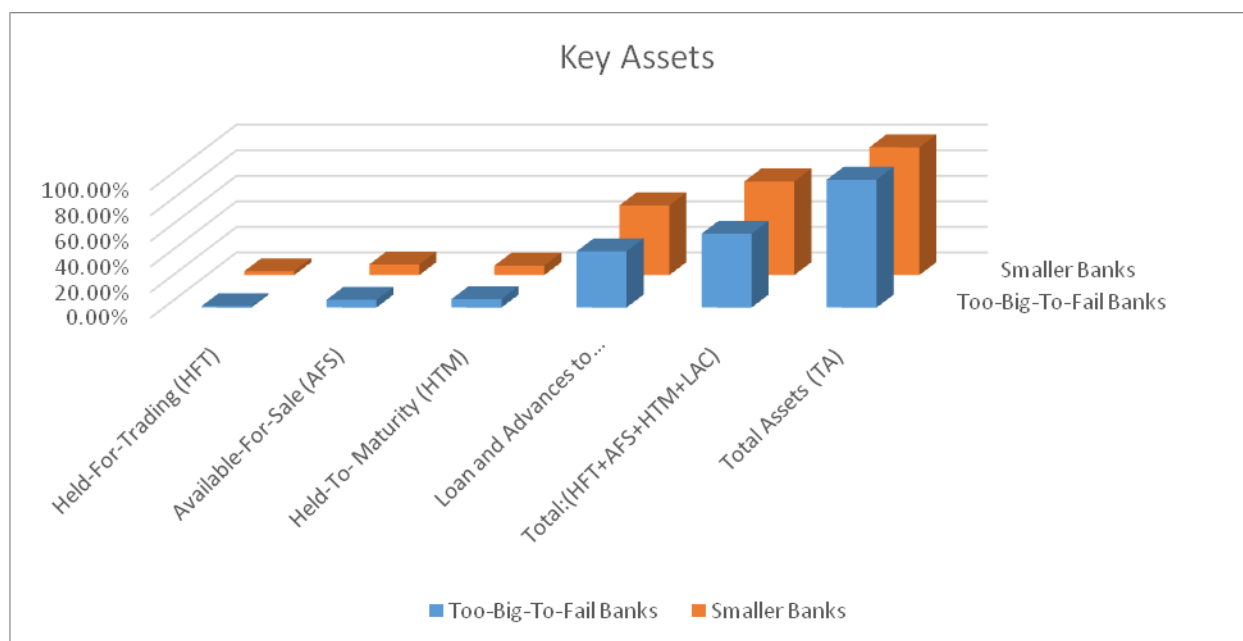
Table 3: Figures and Averages of Six Years Summary of Held-to-Maturity, Held-for-Trading, Available-for-Sale Financial Instruments and Total Assets Obtained From the Eight (8) of Smaller Banks of Study Sample

Sources: Computation from Published Annual Reports and Financial Statements (2010-2015)

	Too-Big-To-Fail Banks (Assets >1.5 Trillion Naira) (Equity >230 Billion Naira)	Smaller Banks (Assets <1.5 Trillion Naira) (Equity <230 Billion Naira)
Held-For-Trading (HFT)	1.07%	3.09%
Available-For-Sale (AFS)	6.09%	8.35%
Held-To- Maturity (HTM)	6.65%	7.37%
Loan and Advances to Customers (LAC)	43.99%	54.51%
Total:(HFT+AFS+HTM+LAC)	57.80%	73.32%
Total Assets (TA)	100%	100%

Table 4: KEY ASSETS ON STATEMENT OF FINANCIAL POSITIONS (BALANCE SHEETS) OF NIGERIA BANKS (as a fraction of total assets for the years 2010-2015)

Source: Computation from Tables 2 and 3



Note the table reports and figure 2 (weighted) averages over the year end amounts from 2010-2015 for various bank assets listed above within each group and year observations are weighted by total assets. Table 4 provides assets averages for the key assets of Nigeria banks reported values as a fraction of total assets for the years 2010 to 2015. In doing this analysis, we distinguished between large bank otherwise called too-big-to-fail banks and smaller banks as they exist in post IFRS period. The larger banks (Too-big-to-fail banks) include banks with total assets greater than N1.5 trillion and equity greater than N230 billion. Smaller banks include banks with assets less than N1.5 trillion and equity less than N230 billion. The subsequent discussion in the next section of the study describes the categories of assets in tables above along with accounting theories and practices.

BANK	YEAR	CBN-ELLM (1)	IFRS-ILLM (2)	D (1)-(2)=3	TIER 1 CAPITAL	D AS % OF TIER1 CAPITAL
	2012	37,369,723	33,249,429	4,000,000	189,823,586	2.12
ACCESS	2013	24,874,774	13,249,429	11,625,429	188,248,156	6.18
	2014	34,014,459	17,012,478	17,001,981	264,026,949	6.45

	2015	64,741,551	26,915,169	37,826,382	346,610,579	10.91
FBN	2012	59,303,000	43,202,000	16,101,000	356,772,000	4.50
	2013	50,168,000	42,650,000	7,518,000	352,011,000	2.13
	2014	83,724,000	38,867,000	38,724,000	316,687,000	12.20
	2015					
GTB	2012	28,133,141	16,820,339	11,312,802	279,885,158	4.04
	2013	36,834,283	19,999,560	16,834,723	318,112,889	5.29
	2014	36,834,000	19,999,560	16,900,396	301,037,314	5.61
	2015	78,324,985	26,309,048	52,309,048	374,059,393	13.98
UBA	2012	9,882,000	8,769,000	1,113,000	137,756,000	0.81
	2013	12,787,000	8,374,000	4,413,000	166,938,000	2.64
	2014	15,859,000	10,653,000	5,206,000	252,861,000	2.05
	2015	31,364,000	14,104,000	17,260,000	288,986,000	5.97
ZENITH	2012	21,437,000	15,768,000	5,669,000	434,750,000	1.33
	2013	37,252,000	27,678,000	9,574,000	467,402,000	2.05
	2014	40,878,000	31,190,000	9,686,000	496,398,000	1.95
	2015	63,258,000	41,908,000	21,350,000	521,282,000	4.09

Table 5

LOAN LOSS PROVISIONING UNDER CBN PRUDENTIAL (EXPECTED LOSS MODEL) AND IFRS INCURRED MODEL FOR FIVE (5) TOO-BIG- TO-FAIL BANKS: 2012-2015

Sources: Computation from Published Annual Reports and Financial Statements (2010-2015)

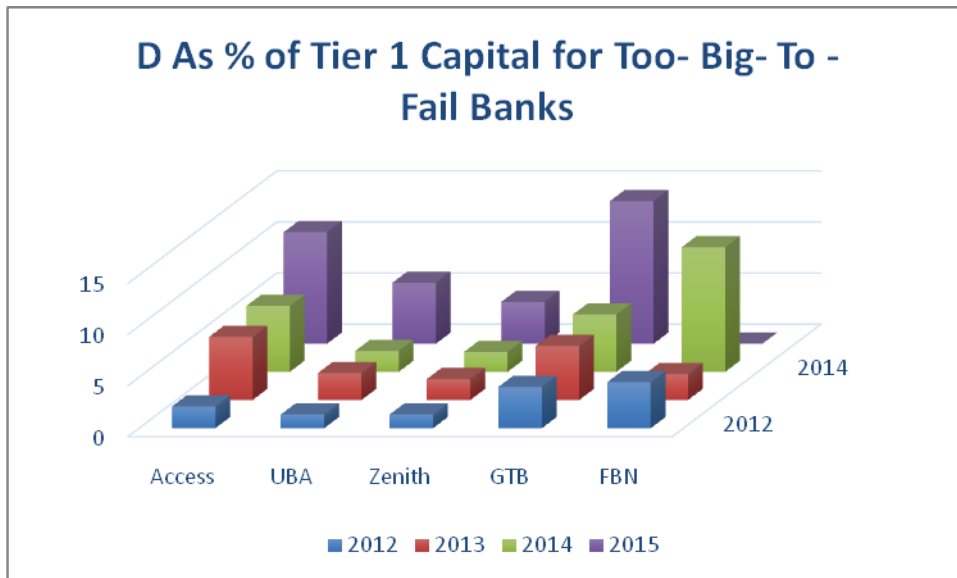
BANK	YEAR	CBN-ELLM (1)	IFRS- ILLM (2)	D (1)-(2)=3	TIER 1 CAPITAL	DAS % OF TIER1 CAPITA L
DIAMOND	2012	28,063,369	31,628,761	-3,565,392	91,570,839	-3.89
	2013	27,175,347	28,152,031	-976,684	133,455,135	-0.73
	2014	34,849,175	39,597,655	-4,748,480	189,862,887	-2.50
	2015					
FIDELITY	2012	19,224,000	20,012,000	-788,000	161,744,000	-0.49
	2013	21,844,000	22,567,000	-723,000	163,380,000	-0.44
	2014	25,551,000	20,471,000	5,066,000	143,955,000	3.52
	2015	32,640,000	23,110,000	9,530,000	143,696,000	6.62
UBN	2012	193,483,000	192,478,000	1,005,000	32,949,000	3.05
	2013	216,203,000	212,497,000	3,706,000	48,056,000	7.71
	2014	221,560,000	212,893,000	8,667,000	67,962,000	12.75
	2015	58,423,000	34,547,000	23,876,000	70,075,000	34.07
STANBIC	2012	18,421,000	18,421,000	0	59,148,000	0.00
	2013	17,982,000	17,213,000	769,000	63,130,000	1.29
	2014	23,635,000	20,269,000	3,366,000	62,356,000	5.90
	2015				71,021,000	
WEMA	2012	14,250,574	13,434,210	816,364	17,880,640	4.57
	2013	7,694,414	7,724,779	-30,365	18,025,449	-0.17

	2014	8,184,297	7,393,091	791,206	20,006,689	3.95
	2015	9,739,684	6,095,642	3,644,042	19,330,694	18.85
STERLING	2012	11,811,635	11,752,908	58,727	38,832,849	0.15
	2013	13,889,373	12,945,690	943,684	56,181,292	1.68
	2014	18,603,154	14,722,416	3,880,738	81,370,755	4.77
	2015	22,387,216	17,317,201	5,070,015	73,295,247	6.91
UNITY	2012	21,482,800	21,360,711	122,090	(21,633,995)	-0.56
	2013	91,518,169	62,878,170	28,640,000	41,241,029	69.28
	2014	85,189,365	46,788,851	38,400,508	4,453,289	862.29
	2015					

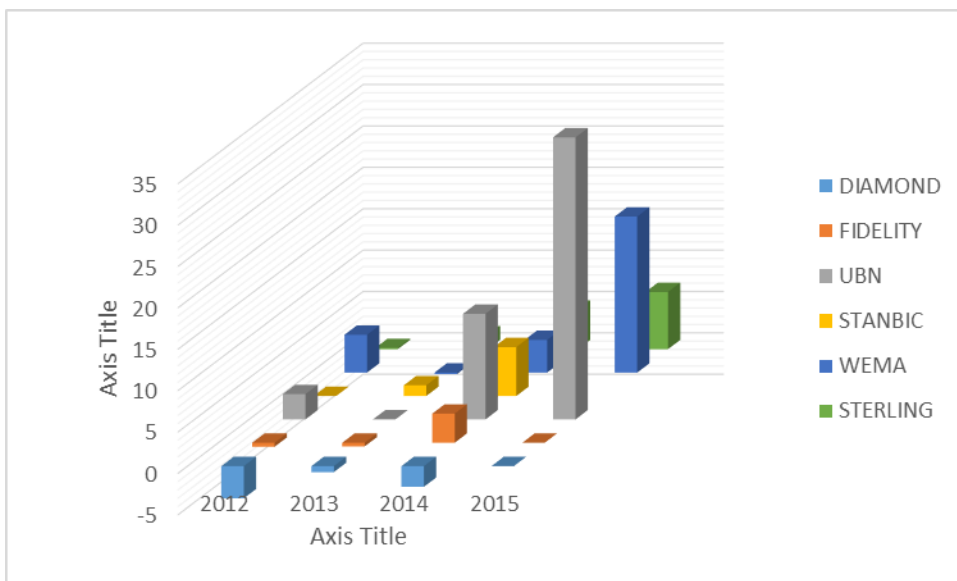
Table 6

LOAN LOSS PROVISIONING UNDER CBN PRUDENTIAL (EXPECTED LOSS MODEL) AND IFRS INCURRED MODEL FOR FIVE (6) SMALLER BANKS: 2012-2015

Source: Computation from Published Annual Reports and Financial Statements



Source: Table 5



Source: Table 6

5. Discussion of Findings

Loan and advances is by far the most important asset for banks and generally account for almost half of banks’ total assets (Laux and Lenz, 2010). From table 4, loans and advances accounted for 43.99% for total assets of Too-Big-To-Fail banks (TBTF-Banks) while 54.51% of total assets of Smaller banks (S-banks) was accounted by loans and advances. They can be classified as either ‘held –for- investment’ or ‘held-for-sale’. Held- for-sale loans and advances are carried at the lower of historical cost or fair value. In practice it is noted that the fraction of loans and lease in this category is typically very small (see figure 2 and table 3). On the other hand, held –for- investment loans and advances historical (original) cost applies.

They are carried at principal amount outstanding adjusted for amortization and are subject to weak impairment testing (FASB, 2006). According to FAS 115, 'held-for-trading' financial instruments are bought and held principally for the purpose of selling them in the near term. Here, fair value accounting applies and fair value changes are recognized in the income statement. For both TBTF-Banks and S-Banks in Nigeria, trading assets constitute an unimportant fraction, 1.07% and 3.09% respectively. This finding is in line with Laux and Lenz (2010) about US banks.

For too –big- to fail banks, “other securities” that are not held for trading and that are classified either as held – to- maturity or available-for-sale are not substantially part of the balance sheet. They are 6.09% and 6.65% respectively. In this category available –for –sale securities are carried at fair value. Unrealized gains and losses arising from changes in fair value that are view temporary are not recognized in the income statement, but in a separate component of shareholder’s equity called accumulated other comprehensive income. However, if such changes are deemed “other-than-temporary”, then asset has to be written-down to its fair value and loss is recognized in the income statement. This is also applicable to smaller banks which have 8.35% and 7.37% for available –for – sale and held-to –maturity. Held- to –maturity investment in debts securities that banks have internet and ability to hold until they mature are carried in balance sheet at historical cost adjusted for amortization. Subject to impairment testing and banks have to disclose their aggregate fair value in the notes to the financial statements. Both classes of Nigeria banks follows mixed attribute accounting rule in carrying their financial instruments to balance sheet.

Further investigation on loan loss provision post- IFRS period, we noticed that CBN like other regulators of financial institutions in Nigeria emphasize increased bank loan loss provisioning while the IFRS tend to discourage aggressive provisioning for transparency concerns. This is consistent with theory. Wall and Koch (2008) in their study x-ray three different philosophies on loan loss accounting. among are FASB’s view that is the measurement of a firm’s net income over a given period and the capital view sees loan loss allowance as an element of capital. From the analysis, the difference between CBN prudential loan loss provision and IFRS incurred loan loss provision as a percentage of tier 1 capital for Too-big-to fail banks is high compare to smaller banks.

6. Summary, Conclusion and Recomendati0ns

The problems identified in the cause of reviewing other scholars work were stated. Among these problems are “legal manipulation of figures” through accounting choices by bank managers and accountants, that investors and taxpayers suffer the negative effects of this false financial statement been cooked up and lack of common view between bank regulators and accounting standard setters on how loan loss allowance should be provided.

From the study, we observed that both the too-big-to fail and smaller banks in Nigeria like their counterparts in other countries use mixed attribute accounting (MAA) which is partly fair value method and historical cost method of accounting.

We also documented evidence in this study that too-big –to fail banks are more aggressive in

the loan loss provisioning based on CBN Prudential guideline unlike smaller banks.

6.1. Conclusions

Owing to the study which examined accounting theories and practice as they relate to loan loss provisioning and measurement of financial instruments by listed banks in Nigeria, the researcher had cause to come to certain conclusions as follows:

Consistent with Healy and Wahlen (1999) and Ozili (2014), it is important for regulators to understand the impact of discretionary loan loss accounting used by both managers and accountants to influence the bank capital and earnings.

The study provided evidence that money deposit banks in Nigeria use loan loss provision to manage capital. This is the second evidence in Nigeria context.

Based on our finding, we also conclude that bank size does not influence the relationship between loan loss provisioning and capital management.

The study grouped the sample banks into two, the too-big-to fail banks and smaller banks to empirically investigate the difference between the loan loss provisioning under IFRS and the CBN prudential guideline. The differences were expressed as percentage of their respective individual banks tier I capital within the two groups and TBTF-Banks were positive provisioning than that of S-Banks that recorded more of negative provisioning. This implies higher conservatism for too-big-to fail banks and lesser conservatism for smaller banks as regards to loan loss accounting. This suggests that regulators emphasize on increased bank provisioning while the IFRS tend to discourage aggressive provisioning for transparency concerns. It should be recalled that CBN introduced this prudential provisioning because of the apparent abuse of loan loss provision in the banking sector. It also implies instead of using to create a false profit report or declare high dividend (earning management or signaling) the difference is being credited to a regulatory reserve which is part of tier 1 capital. Finally we conclude that Nigeria banks cannot claim that fair value accounting is destroying its balance sheet as its been claimed by banks in other countries. This conclusion is based on their choices of categorizing their financial instruments either as held-to-maturity (HTM) or available-for-sale (AFS) and held-for-trading (HFT). What we observed in their various balance sheets reported in line with IFRS is a mixed attribute accounting (MAA).

6.2. Recommendations

Based on the findings and conclusions, the following recommendations are made:

Lending voice to Osioma and Enahoro (2006) and Akenbor and Ibanichuka (2012) we recommend that accounting principles and rules should be streamlined to reduce diversities of professional judgment in financial reporting. There should be synergy between the regulators and accounting standard setters (CBN and IASB). The stability of the financial system and providing the honest and true information to investors should be a paramount objective of the two bodies. Nigerian banks should quickly adopt IFRS 9 model of loan loss provision that agrees with CBN expected loan loss provisioning.

6.3. Contribution to Knowledge

Despite the limitations of this study it has provided a number of insights and contributions to the current literature and concerns of accounting standard setters and bank regulators on the current model of loan loss provision as well as on-going debate that fair value accounting destroys banks' balance sheets. It also provide evidence that Too-big-to fail banks unlike smaller banks increased loan loss provisioning in line with regulators emphasize on aggressive provisioning. This provide evidence that regulators are forward looking and emphasize on increased provisioning while the IFRS is backward looking and tend to discourage aggressive provisioning. The study provides evidence that the assumption of pure fair value accounting (PFVA) does not exist among Nigeria banks rather mixed attribute accounting (MAA) model.

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Appendix I

**SHOWING THE NUMBER OF BANKS AND CRITERIA FOR INCLUSION IN THE
SAMPLE**

S/N	Bank	Year of Incorporation	Year of Listing	Evidence of IFRS	Evidence of Tier 1 & Tier II	Data Complete
1.	Access Bank Plc	1989	1998	Yes	yes	YES
2.	Diamond Bank Plc	1990	2005	Yes	yes	YES
3.	Eco Bank Plc	1985	2003	Yes	yes	YES
4.	Fidelity Bank	1988	2005	Yes	yes	YES
5.	First Bank of Nig. Plc	1894	1971	Yes	ye	YES
6.	First City Monument Bank	1982	2004	Yes	yes	NO
7.	Guaranty Trust Bank Plc	1990	1996	Yes	yes	YES
8.	Nigeria Police Force (NPF) Micro. Finance	1993	2010	Yes	yes	NO
9.	Skye Bank Plc	1989	2006	Yes	yes	NO
10.	Stanbic IBTC Plc	2000	2007	Yes	yes	YES
11.	Sterling Bank Plc	1960	2006	Yes	yes	YES
12.	Standard Chartered Bank			Yes	yes	NO
13.	Union Bank Plc	1917	1971	Yes	yes	YES
14.	Unity Bank Plc	2006	2006	Yes	yes	YES
15.	UBA Plc	1948	1971	Yes	yes	YES
16.	Wema Bank Plc	1945	1990	Yes	ys	YES
17.	Zenith Bank Plc	1990	2004	Yes	yes	YES

18.	Enterprise Bank Limited (EBL)	2011	NL	Yes	yes	NO
19	Keystone Bank	2001	NIL	Yes	yes	NO
20	Mainstreet Bank Ltd	2006	NIL	Yes	yes	NO
21	Heritage Banking Company ltd	2012	NIL	Yes	yes	NO

Source: CBN ANNUAL REPORTS, VARIOUS BANKS ANNUAL REPORTS AND WEBSITES.

APPENDIX 8											
ASSETS OF TOO BIG TO FAIL BANKS											
FBN 000	ZINETH BANK	UBA	GTB	ACCESS BANK	TOTAL	AVERAGE					
2010	1,957,258,000	1,798,679,000	1,432,632,000	1,168,052,897	726,960,500	7,083,582,397	1416716479				
2011	2,463,543,000	2,169,073,000	1,655,465,000	1,523,527,545	949,382,097	8,760,990,642	1752198128				
2012	2,770,674,000	2,436,886,000	1,933,065,000	1,620,317,223	1,515,754,463	10,276,696,686	2,055,339,337				
2013	3,118,110,000	2,878,693,000	2,217,417,000	1,904,365,795	1,704,094,013	11,822,679,808	2,364,535,962				
2014	3,490,872,000	3,423,819,000	2,338,858,000	2,126,608,312	1,981,955,930	13,362,113,242	2,672,422,648				
2015	3,450,112,000	3,750,327,000	2,216,337,000	2,277,629,224	2,411,944,061	14,106,349,285	2,821,269,857				
						65,412,412,060	13,082,482,412				
6.089710704 AFS FOR TBTF											
APPENDIX 9											
SAMPLE OF AVAILABL-E FOR- SALE FINANCIAL INSTRUMENTS (2010-2013) for too-big-to fail banks											
YEAR	FBN	ZENITH	GTB	UBA	ACCESS BANK	TOTAL	AVERAGE				
2010	201,163,000	15,402,000	6,920,000	107,317,000	9,377,133	340,179,133	68,035,826.60				
2011	340,767,000	10,838,000	3,744,970	63,428,000	11,992,763	430,770,733	86,154,146.60				
2012	252,911,000	10,338,000	10,139,000	126,646,000	3,069,725	403,103,725	80,620,745.00				
2013	325,839,000	4,749,000	364,056,362	244,467,000	1,406,710	940,518,072	188,103,614.40				
2014	404,507,000	0	327,657,669	261,741,000	23,438,484	1,017,344,153	203,468,830.60				
2015	580,922,000	0	0	270,409,000	179,843	851,510,843	170,302,168.60				
						3,983,426,659	796,685,331.80				
SAMPLE OF AVAILABL-E FOR- SALE FINANCIAL INSTRUMENTS (2010-2013) FOR SMALLER BANKS											
YEAR	ECOBANK	DIAMOND	FIDELITY	STANBIC	UNION	WEMA	STERLING	UNITY	TOTAL	AVERAGE	
2010	26,036,000	11,095,806	38,007,000	0	0	0	0	19,439,165	94,577,971	11,822,246.38	
2011	246,425,000	76,762,309	131,849,000	76,117,000	0	0	3,233,254	16,221,557	550,608,120	68,826,015.00	
2012	222,480,000	10,555,061	21,835,000	96,069,000	23,599,000	7,424,878	16,857,661	25,247,739	424,068,339	53,008,542.38	
2013	162,956,000	9,742,112	21,040,000	11,511,000	17,805,000	7,180,114	19,496,194	49,456,338	299,186,758	37,398,344.75	
2014	266,572,000	6,965,670	90,864,000	0	1,930,000	0	49,039,378	57,903,167	473,274,215	59,159,276.88	
2015	532,069,616	0	176,607,000	0	1,124,000	2,964,626	119,478,644	0	832,243,886	104,030,485.75	
									2,673,959,289	334,244,911.13	
8.345350316											
APPENDIX 10											
LOAN AND ADVANCES TO CUSTOMERS of TOO BIG TO FAIL BANKS											
FBN	ZENITH	GTB	UBA	ACCESS BANK	TOTAL	AVERAGE					
2010	108,699,000	754,024,000	603,906,669	557,224,000	428,605,827	2,452,459,496	490,491,899.20				
2011	1,285,000,000	893,834,000	706,893,133	552,526,000	490,877,501	3,929,130,634	785,826,126.80				
2012	1,316,407,000	916,791,000	742,437,000	570,714,000	554,592,199	4,100,941,199	820,188,239.80				
2013	1,473,840,000	1,148,378,000	926,967,093	796,942,000	735,300,741	5,081,427,834	1,016,285,566.80				
2014	1,794,037,000	1,580,250,000	1,182,393,874	884,587,000	1,019,918,848	6,461,186,722	1,292,237,344.40				
2015	1,570,848,000	1,849,225,000	1,265,207,443	822,694,000	1,243,215,309	6,751,189,752	1,350,237,950.40				
						5,755,267,127.40	43.99				
LOAN AND ADVANCES TO CUSTOMERS of Smaller BANKS											
YEAR	ECOBANK	DIAMOND	FIDELITY	STANBIC	UBN	WEMA	STERLING	UNITY	TOTAL	AVERAGE	
2010	225,369,000	299,534,692	158,516,000	185,046,000	178,654,000	44,979,858	99,312,070	116,688,894	1,308,100,514	163,512,564.25	
2011	410,150,000	344,397,331	255,257,000	266,002,000	140,520,000	67,238,605	159,734,616	117,875,258	1,761,174,810	220,146,851.25	
2012	546,813,000	523,374,608	345,500,000	279,473,000	148,790,000	73,745,728	229,420,874	189,041,345	2,336,158,555	292,019,819.38	
2013	625,907,000	585,953,062	426,076,000	289,741,000	230,720,000	98,631,825	321,743,748	195,229,513	2,774,002,148	346,750,268.50	
2014	2,286,148,803	712,064,692	541,686,000	398,604,000	302,372,000	149,293,849	371,246,273	219,335,346	4,980,750,963	622,593,870.38	
2015	2,232,339,556	0	578,203,000	392,054,000	578,203,000	185,596,590	338,726,271	0	4,305,122,417	538,140,302.13	
									2,183,163,675.88	54.50873017	
105											
APPENDIX 11											
HTM of TOO BIG TO FAIL BANKS											
YEAR	FBN	ZENITH	GTB	UBA	ACCESS BANK	TOTAL	AVERAGE				
2010	44,331,000	162,907,000	23,443,000	284,144,000	106,377,781	621,202,781	124,240,556.20				
2011	329,857,000	257,660,000	163,914,000	496,600,000	143,684,639	1,391,715,639	278,343,127.80				
2012	330,860,000	0	118,898,000	401,348,000	2,290,861	853,396,861	170,679,372.20				
2013	278,875,000	0	46,682,498	340,978,000	38,005,333	704,540,831	140,908,166.20				
2014	140,468,000	0	46,746,008	181,168,000	0	368,382,008	73,676,401.60				
2015	110,939,000	0	0	297,794,000	0	408,733,000	81,746,600.00				
						869,594,224.00	6.65				
HTM of Smaller BANKS											
YEAR	ECOBANK	DIAMOND	FIDELITY	STANBIC	UBN	WEMA	STERLING	UNITY	TOTAL	AVERAGE	
2010	0	43,978,424	27,761,000	0	0	0	0	35,427,340	107,166,764	13,395,845.50	
2011	0	52,253,105	75,622,000	0	0	0	169,242,661	55,939,144	353,056,910	44,132,113.75	
2012	0	64,751,759	76,258,000	0	256,850	70,514,802	155,935,974	55,072,364	422,789,749	52,848,718.63	
2013	0	270,966,001	45,105,000	0	272,512,000	102,379,943	76,123,934	28,259,864	795,346,742	99,418,342.75	
2014	0	316,650,635	69,526,000	0	0	0	45,581,835	26,550,431	458,308,901	57,288,612.63	
2015	0	0	189,736,000	0	0	0	45,269,333	0	236,005,333	39,363,045.60	

HTM of Smaller BANKS										
YEAR	ECOBANK	DIAMOND	FIDELITY	STANBIC	UBN	WEMA	STERLING	UNITY	TOTAL	AVERAGE
2010	0	43,978,424	27,761,000	0	0	0	0	35,427,340	107,166,764	13,395,845.50
2011	0	52,253,105	75,622,000	0	0	0	169,242,661	55,939,144	353,056,910	44,132,113.75
2012	0	64,751,759	76,258,000	0	256,850	70,514,802	155,935,974	55,072,364	422,789,749	52,848,718.63
2013	0	270,966,001	45,105,000	0	272,512,000	102,379,943	76,123,934	28,259,864	795,346,742	99,418,342.75
2014		316,650,635	69,526,000				45,581,835	26,550,431	458,308,901	57,288,612.63
2015			180,736,000				45,360,372		226,096,372	28,262,046.50
										295,345,679.75
		106								7.374123224

APPENDIX 12 HFT of TOO BIG TO FAIL BANKS						
YEAR	FBN	ZENITH BANK	GTB	UBA	ACCESS BANK	TOTAL
2010	11,485,000	587,000	131,189,000	1,267,000	2,286,974	146,814,974
2011	2,552,000	0	151,819,000	237,000	1,056,706	155,664,706
2012	1,942,000		267,417,000	456,000	49,659,614	319,474,614
2013	2,225,000		13,746,682	777,000	819,940	17,568,622
2014	9,258,000		5,675,545	1,099,000		16,032,545
2015	8,225,000		25,075,615	11,249,000		44,549,615
						700,105,076
						140,021,015.20

HFT of Smaller BANKS										
YEAR	ECOBANK	DIAMOND	FIDELITY	UBN	STANBIC	WEMA	STERLING	UNITY	TOTAL	AVERAGE
2010	6,821,000	1,109,080	0	0	0	0	0	0	7,930,080	991,260.00
2011	32,812,000	8,041,618	20,630,000	0	66,476,000	0	0	0	127,959,618	15,994,952.25
2012	23,394,000	90,111,236	201,806,000	867,000	113,401,000	0	1,998,860	0	431,578,096	53,947,262.00
2013	17,881,000	3,428,848	254,909,000	2,847,000	40,711,000	0	2,200,994	0	321,977,842	40,247,230.25
2014		3,481,299	83,363,000				1,949,460	2,793,700	91,587,459	11,448,432.38
2015			4,070,000				4,692,636		8,762,636	1,095,329.50
										123,724,466.38
										3.089124113

	FBN	ZINETH BANK	UBA	GTB	ACCESS BANK	TOTAL	AVERAGE
000							
2010	1,957,258,000	1,798,679,000	1,432,632,000	1,168,052,897	726,960,500	7,083,582,397	1416716479
2011	2,463,543,000	2,169,073,000	1,655,465,000	1,523,527,545	949,382,097	8,760,990,642	1752198128
2012	2,770,674,000	2,436,886,000	1,933,065,000	1,620,317,223	1,515,754,463	10,276,696,686	2,055,339,337
2013	3,118,110,000	2,878,693,000	2,217,417,000	1,904,365,795	1,704,094,013	11,822,679,808	2,364,535,962
2014	3,490,872,000	3,423,819,000	2,338,858,000	2,126,608,312	1,981,955,930	13,362,113,242	2,672,422,648
2015	3,450,112,000	3,750,327,000	2,216,337,000	2,277,629,224	2,411,944,061	14,106,349,285	2,821,269,857
						65,412,412,060	13,082,482,412

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