

**Disclosures on
Risk based Capital Requirement under Pillar III of Basel III
For the year ended 31 December 2019**



Commercial Bank of Ceylon PLC
Bangladesh Operations

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**Commercial Bank of Ceylon PLC - Bangladesh Operations
Disclosures on Risk based Capital Requirement under Pillar III of Basel III
For the year ended 31 December 2019**

Disclosure Policy:

Commercial Bank of Ceylon PLC ("the Bank") is a publicly quoted company incorporated in Sri Lanka on 25 June 1969. It is a licensed commercial Bank operating under the provisions of Sri Lanka Banking Act No. 30 of 1988. The Commercial Bank of Ceylon PLC - Bangladesh Operations commenced its Banking operations in Bangladesh from 06 November 2003 by acquiring the operations of Credit Agricole Indosuez a French Bank with two branches and two booths. The principal office of the Bank in Bangladesh is situated at Dhaka having eleven branches currently in operations at Dilkusha, Dhanmondi, Uttara, Mirpur, Gulshan 1, Gulshan 2, Panthapath, Tejgaon of Dhaka and each at Narayanganj, Chattagram and Sylhet. The Bank also maintains six SME centres at Old Dhaka, Shantinagar, Progati Sharani of Dhaka, Tongi of Gazipur, Jubilee Road and CDA Avenue of Chattagram.

- a. To comply with international best practices and make the Bank's capital more risk-absorbent;
- b. To maintain minimum capital requirement by the Bank against credit, operational and market risk;
- c. To maintain capital adequacy ratio as per Bangladesh Bank's time to time Requirements;
- d. To adopt the credit rating agencies as external credit assessment institutions (ECAI);
- e. To adopt standardised approach for both credit and market risk and basic indicator approach for operational risk;
- f. To submit Capital Adequacy returns to Bangladesh Bank on a quarterly basis.

2 Scope of Applications:

Risk based capital adequacy framework applies to Commercial Bank of Ceylon PLC, Bangladesh Operations, on "Solo Basis" as the Bank has no subsidiaries or significant investments rather operating as a foreign Branch of Commercial Bank of Ceylon PLC incorporated in Sri Lanka.

3 Disclosures Framework:

Disclosures requirements as per Bangladesh Bank Basel III Guidelines are enumerated below:

3.1 Capital Structure

Qualitative Disclosure

The aim is for the capital structure to be as efficient as possible, both in terms of cost and in terms of compliance with the requirements of Bangladesh Bank. Bank's total capital as of 31 December 2019 was BDT 11,849.42 million out of which BDT 11,218.92 million was under Tier-I capital (out of that BDT 4,729.88 million was Deposit kept with Bangladesh Bank as per section 13 (4) of Banking Companies Act 1991 and remaining BDT 6,489.04 million was Retained Profit after regulatory deduction) and remaining BDT 630.50 million was under Tier-II capital (General Provision of BDT 630.50 million).

Quantitative Disclosure:

Amounts in BDT

a) Amount of Tier I Capital

i) Common equity Tier 1 (CET 1)

Fully paid-up capital / capital deposited with Bangladesh Bank	4,729,877,290
Statutory Reserve	-
Actuarial gain/loss	-
Retained earnings	6,641,711,812
Non-repatriable interest-free fund	-

11,371,589,102

Amount deducted from CET 1 Capital (Regulatory Adjustments)

- Good will
- Shortfall
- Deferred tax assets
- Others

152,664,385

Total CET 1 Capital

11,218,924,717

ii) Additional Tier I capital

-

Total Tier I Capital (i+ii)

11,218,924,717

b) Total Tier II capital

630,500,000

Total eligible capital (a+b)

11,849,424,717

3.2 Capital Adequacy

Qualitative Disclosure of Capital Adequacy

Bank is maintaining adequate capital to cover all material risk and while doing so Bank has established an Internal Capital Adequacy Assessment Process (ICAAP) in-line with Bangladesh Bank. The objective of the Bank's capital planning is to ensure that the Bank is adequately capitalized.

At the end of 31 December 2019 Bank maintained capital of BDT 11,849.42 million (Tier 1: going-concern capital of BDT 11,218.92 million plus Tier 2: gone-concern capital of BDT 630.50 million) against its total Risk Weighted Asset (RWA) of BDT 36,343.25 million which leads to a Capital to Risk-weighted Asset Ratio (CRAR) of 32.60%, where the minimum requirement is 12.50% as per BRPD circular no. 18 dated 21 December 2014. Tier-I capital was 30.87% of RWA against minimum requirement of 6% of RWA. As a result the Bank has a buffer Capital of BDT 7,849.42 million to maintain to mitigate the additional uncertain risks which are not covered under Pillar-II.

Quantitative Disclosure of Capital Adequacy

a) Amount of Regulatory Capital to meet unforeseen loss:	BDT	
Amount of Capital required to meet Credit Risk	3,103,891,310	
Amount of Capital required to meet Market Risk	49,130,650	
Amount of Capital required to meet Operational Risk	481,303,427	
	<u>3,634,325,387</u>	
b) Actual Capital Maintained:		
Total CET 1 Capital	11,218,924,717	
Total Tier I Capital	11,218,924,717	
Total Tier II Capital	630,500,000	
Total capital	<u>11,849,424,717</u>	
% of Capital to risk weighted assets (CRAR)		
	Required	Maintained
CET 1	4.50%	30.87%
Tier I	6.00%	30.87%
Tier II		1.73%
Total	12.50%	32.60%
c) Capital conservation buffer	2.50%	2.50%
d) Available capital under pillar 2 requirement		7,849,424,717

3.3 Credit Risk

Qualitative Disclosures:

General qualitative disclosure requirement with respect to credit risk includes the following:

Definition of past due and impaired

According to the Bangladesh Bank's guidelines on Risk Based Capital Adequacy (RBCA), dated December 2014, claims that are past due for 60 days or more are clubbed under this past due category. Apart from the Basel III requirement, for accounting purpose Bank is maintaining its past due loan in accordance with the BRPD Master circular no. 14 dated 23 September 2012 on "Loan Classification & Provisioning" and its related subsequent instructions.

Description of approaches followed for specific & general allowances and statistical methods

Bank is following the general and specific provision requirement as prescribed by Bangladesh Bank time to time.

Discussion of the Bank's credit risk management policy

Credit risk is one of the most significant risks in terms of sustainability, regulatory and capital requirements, which the Bank is exposed to. Bank's policy is to develop a high quality and diversified credit portfolio comprised of corporate, SME and retail / personal customers in Bangladesh towards better credit risk management.

With a view to segregate credit risk from credit marketing, as also in line with Basel-III requirement, an independent Credit Risk Department is in existence in the Bank since inception. Credit risk management focuses on the quality of customer's individual loans as well as the overall loans and advances portfolio, examining and reporting the underlying trends, concentrations and ensuring a sustainable credit risk culture throughout the Bangladesh operation.

Objectives of the Bank's credit risk management practices are to maintain credit portfolio quality in line with risk appetite, through risk control and risk management.

Credit risk management system of the Bank also closely monitors changes in economic and market conditions and guides business and functional management, at all levels, on their credit portfolio. It works towards maintaining a robust credit culture through prudent strategies, credit policies, procedures, and management of credit portfolio. Thus the scope of credit risk management and identification practices needs to follow the procedures below:

To identify and manage credit risk, the Bank engages in procedures such as:

- i. Set up strategy for credit origination and relationship management.
- ii. Credit risk management.
- iii. Loan documentation and credit administration.
- iv. Recovery and management of problem loans.
- v. Portfolio management
- vi. Conveying credit status through reporting

Bank uses internal lending guidelines and procedures to ensure that all lending officers understand the Bank's appetite for risk in servicing counter party requirements, and thus facilitates evaluation and approval of individual credit transactions.

Bank has standard methods of analysing various risk aspects involved in extending credit, considering risk areas such as business risk, financial risk, management risk, security risk, etc. besides continuously reviewing the exposures and concentrations of the customer, group, industry, geography and lending type. Outcome of these risk analyses are used to establish internal credit risk grading for each borrower.

Maintenance of Specific Provision

Commercial Bank of Ceylon PLC, Bangladesh Operations strictly complies with its internal credit procedure prepared in line with prevailing Bangladesh Bank's guidelines including BRPD Circular No. 14 dated 23 September 2012, BRPD Circular No. 19 dated 27 December 2012 and BRPD Circular No. 05 dated 29 May 2013 concerning management of non-performing loans, loan classification and provisioning.

In line with above guidelines, the Bank reviews the loans and advances throughout the year so as to assess them in order to maintain the provision required there against at the end of the each quarter during the year.

Moreover, BRPD circulars no. 14 dated 23 September 2012 and 19 dated 27 December 2012 also warrants further provisioning based on our qualitative judgments in case where any uncertainty or doubts arises in respect of recovery of any continuous loan, demand loan or fixed term loan, which will also compel the Bank to classify such loans on the basis of qualitative judgment. If the specific provisions assessed under the qualitative methodology are higher than the specific provisions assessed under the formulaic approach above, the higher of two is recognised in liabilities under "provisions for loans and advances" with any movement in the provision charged/ released having reflected in the profit and loss statement.

Quantitative Disclosure

Amounts in BDT

Total exposures of credit risk

A) Funded Exposures

- a) Domestic
- b) Overseas (Nostro Balances)

32,428,707,952

-

32,428,707,952

B) Non-funded exposures

- a) Domestic
- b) Overseas

-

4,136,732,223

4,136,732,223

A) Broken down by major types of credit exposure

a) Cash and cash equivalents	289,341,866
b) Claims on Bangladesh Government and Bangladesh	15,302,441,935
c) Claims on other sovereigns and Central Banks*	-
d) Claims on Bank for international settlements, International Monetary Fund and European Central Bank	-
e) Claims on Multilateral Development Banks (MDBs)	-
f) Claims on Public Sector Entities (other than Govt. of Bangladesh) in BGD	-
g) Claims on Banks & NBFIs:	-
Maturity Over 3 Months	1,636,694,130
Maturity less than 3 Months	5,266,553,888
h) Claims on Corporate	24,697,803,339
i) Claims under Credit Risk Mitigation	1,717,782,873
j) Claims categorized as retail portfolio and small & medium enterprise (excluding consumer finance)	1,280,608,434
k) Consumer finance	107,810,089
l) Claims fully secured by residential property	726,556,634
m) Claims fully secured by commercial real estate	882,636,649
n) Past due loans/NPL	418,592,098
o) Investments in premises, plant and equipment and all other fixed assets	124,679,191
p) Claims on Fixed Assets under Operating Lease	-
q) All Other Assets	-
i) Claims on GoB and BB (Advance Income Tax)	3,781,908,558
ii) Staff loan/investments	99,106,529
iii) Other assets	5,916,484,054
r) Off-balance sheet items:	
Claims on Banks:	
Maturity Over 3 Months	123,512,051
Maturity less than 3 Months	35,976,819
Claims on corporate	7,463,724,542
Retail portfolio and small & medium enterprises	434,436,367
	70,306,650,046

D. Details of Exposure under Credit Risk Mitigation (CRM)

• Claims secured by financial collateral	2,685,384,631
• Net exposure after the application of haircuts	3,088,192,319
• Value of Financial Collateral after haircuts	1,325,613,472
	7,099,190,422

B. Geographical Distribution of Exposure

Amounts in BDT

Category	Dhaka	Chattagram	Sylhet	Total
Balance Sheet Items				
Claims on sovereigns and central Banks	15,482,126,277	94,052,979	15,604,545	15,591,783,801
Claims on Banks and NBFIs	6,903,248,018	-	-	6,903,248,018
Claims on corporate	22,136,184,046	4,872,926,965	707,703,948	27,716,814,959
Claims on retail portfolio and consumer finance	2,055,895,333	37,619,577	21,460,247	2,114,975,157
Fixed assets	118,757,590	3,599,404	2,322,197	124,679,191
Staff loan	99,106,529	-	-	99,106,529
All other assets	9,311,464,785	380,326,098	6,601,729	9,698,392,612
Total on balance sheet items	56,106,782,578	5,388,525,023	753,692,666	62,249,000,267
Off Balance Sheet Items				
Claims on Banks	159,488,870	-	-	159,488,870
Claims on corporate	6,561,957,807	901,766,735	-	7,463,724,542
Claims on retail portfolio and consumer finance	401,802,359	32,634,008	-	434,436,367
Total off balance sheet items	7,123,249,036	934,400,743	-	8,057,649,779
Total	63,230,031,614	6,322,925,766	753,692,666	70,306,650,046

C. Industry or Counterparty type distribution of exposures

Amounts in BDT

Category	Bank and NBFIs	Manufacturing industries	Retail and Consumer finance	Others	Total
Balance Sheet Items					
Claims on sovereigns	15,591,783,801	-	-	-	15,591,783,801
Claims on Banks and NBFIs	6,903,248,018	-	-	-	6,903,248,018
Claims on corporate	-	27,716,814,959	-	-	27,716,814,959
Claims on retail portfolio	-	-	2,114,975,157	-	2,114,975,157
Fixed assets	-	-	-	124,679,191	124,679,191
Staff loan	-	-	-	99,106,529	99,106,529
All other assets	-	-	-	9,698,392,612	9,698,392,612
Total on balance sheet	22,495,031,819	27,716,814,959	2,114,975,157	9,922,178,332	62,249,000,267

Off-balance sheet items

Claims on Banks	159,488,870	-	-	-	159,488,870
Claims on corporate	-	7,463,724,542	-	-	7,463,724,542
Claims on retail portfolio	-	-	434,436,367	-	434,436,367
Total off balance sheet	159,488,870	7,463,724,542	434,436,367	-	8,057,649,779
Total	22,654,520,689	35,180,539,501	2,549,411,524	9,922,178,332	70,306,650,046

D. Residual Contractual Maturity

Amounts in BDT

Residual contractual maturity	Balance sheet items	Off-balance sheet items	Total
Up to 1 month maturity	26,623,542,237	388,964,920	27,012,507,157
1-3 months maturity	11,031,565,812	2,765,155,899	13,796,721,711
3-12 months maturity	14,841,288,827	4,291,039,886	19,132,328,713
1-5 years maturity	8,838,484,527	612,489,074	9,450,973,601
Above 5 years maturity	914,118,864	-	914,118,864
Total	62,249,000,267	8,057,649,779	70,306,650,046

E. Major Industry or Counterparty Type (past due)

Amounts in BDT

i) Amount of impaired / classified loans by major industry/ sector type

Major industry/sector	
Bank and NBFIs	-
Manufacturing industries	154,989,888
Retail and Consumer finance	12,713,733
Others	190,370,014
Total	358,073,635

ii) Specific and general provision

General provision	
Loans and advances	476,000,000
Off-Balance sheet items	154,500,000
	630,500,000
Specific provision	182,861,255

iii) Charges for specific allowance and charges-offs during the year

Specific provisions made during the period	5,650,040
Write-back of excess specific provisions	23,133,875

Amounts in BDT

F) Gross non-performing assets (NPAs)	358,073,635
Total loans & advances	33,288,906,968
Non-performing loans and advances	358,073,635
Special mentioned account (SMA)	-
Sub-standard	3,025,830
Doubtful	-
Bad/ Loss	355,047,805

Non-Performing Assets (NPAs) to Outstanding Loans and advances

1.08%

G) Movement of Non-Performing Assets (NPAs)

Opening balance	328,338,404
<u>Add:</u> Addition during the year	89,755,487
<u>Less:</u> Reduction during the year	60,020,256
Closing balance	358,073,635

H) Movement of specific provisions for NPAs

Opening balance	200,345,090
<u>Add:</u> Provisions made during the period	5,650,040
<u>Less:</u> Write-off	-
<u>Less:</u> Write-back of excess provisions	23,133,875
Closing balance	182,861,255

3.4 Equities: Disclosures for Banking Book Positions

Qualitative Disclosure

The Bank has no investments in quoted Shares. The Bank has only equity investments in Central Depository Bangladesh Limited (CDBL) shares as unquoted investment.

Quantitative Disclosures Details of Unquoted Investments

Amounts in BDT

Banking Book Assets

<u>Particulars</u>	<u>Number of shares</u>	<u>Face Value</u>	<u>Cost</u>
CDBL Shares (Initial)	600,000	6,000,000	6,000,000
Bonus received for the year 2009	600,000	6,000,000	-
Purchased on October 14, 2010	341,666	3,416,660	3,416,660
Bonus declared for the year 2010	1,200,000	12,000,000	-
Bonus declared for the year 2011	685,417	6,854,170	-
Total of CDBL Shares	3,427,083	34,270,830	9,416,660

3.5 Interest rate risk in the Banking book (IRRBB)

Qualitative Disclosure

Interest rate risk refers to fluctuations in Bank's net interest income and the value of its assets and liabilities arising from internal and external factors.

Internal factors include the composition of the Bank's assets and liabilities, quality, maturity, interest rate and re-pricing period of deposits, borrowings, loans and investments.

External factors cover general economic conditions:

Interest rates volatility has impact on the Bank depending on balance sheet positioning. Interest rate risk is prevalent on both the assets as well as the liability sides of the Bank's balance sheet.

Assets - Liability Management Committee (ALCO) periodically monitors and controls the risks and returns, funding and deployment, setting Bank's lending and deposit rates, and directing the investment activities of the Bank. ALCO decides on the fixation of interest rates on both assets and liabilities after considering the macro or micro economic outlook - both global and domestic, as also the macro aspects like cost- benefit, financial inclusion and host of other factors.

Credit shock under Basel III (balance sheet exposure)

Amounts in BDT Crore

<u>Magnitude of Shock</u>	<u>Minor</u>	<u>Moderate</u>	<u>Major</u>
Weighted average yield on assets (%)	10.00	10.00	10.00
Total Assets	7,030.67	7,030.67	7,030.67
Total RWA before shock	3,634.33	3,634.33	3,634.33
Total increase in RWA after shock	46.56	93.10	139.62
Total increase Capital requirement after shock	4.66	9.31	13.96
Total RWA after shock	3,680.89	3,727.43	3,773.95
Eligible capital	1,184.94	1,184.94	1,184.94
Capital adequacy ratio after shock (%)	32.19	31.79	31.40
Capital adequacy ratio before shock (%)	32.61	32.61	32.61
Changes in CRAR (%)	(0.42)	(0.82)	(1.21)

Credit Shock under Basel III (Off Balance Sheet Exposure)

Amounts in BDT Crore

Magnitude of Shock	Minor	Moderate	Major
Weighted Average yield on assets (%)	10.00	10.00	10.00
Total Assets	7,030.67	7,030.67	7,030.67
Total RWA before shock	3,634.33	3,634.33	3,634.33
Total increase in RWA after shock	6.06	12.13	18.19
Total increase in capital requirement after shock	0.61	1.21	1.82
Total RWA after shock	3,640.39	3,646.46	3,652.52
Eligible capital	1,184.94	1,184.94	1,184.94
Capital Adequacy Ratio after shock (%)	32.55	32.50	32.44
Capital Adequacy Ratio before shock (%)	32.61	32.61	32.61
Changes in CRAR (%)	(0.06)	(0.12)	(0.17)

Combined Shock

Amounts in BDT Crore

Magnitude of Shock	Minor	Moderate	Major
Capital Adequacy Ratio before shock (%)	32.61	32.61	32.61
Decrease in the FSV of the collateral	-0.07	-0.13	-0.26
Increase in NPLs	-1.18	-3.87	-7.41
Negative shift in NPLs categories	-0.06	-0.13	-0.26
Interest rate	0.00	0.00	0.00
FEX: Currency appreciation	-0.04	-0.09	-0.13
Equity shock	0.00	0.00	-0.01
Total change	-1.35	-4.23	-8.08
CRAR after shock (%)	31.25	28.38	24.53

3.6 Market Risk

Qualitative Disclosure

Market risk is the risk of adverse revaluation or movement of any financial instrument as a consequence of changes in market prices or rates. Market risk exists in all trading, Banking and investment portfolios but for the purpose of this report, it is considered as a risk specific to trading book of the Bank.

The major types of market risk as specified in the Risk Based Capital Adequacy (RBCA) are as follows:

- i. Interest rate risk
- ii. Equity position risk
- iii. Foreign exchange risk and
- iv. Commodity risk

Among the above list the main type of market risk faced by the Bank are interest rate risk and foreign exchange risk. Bank Management committee of Bangladesh Operations has given significant attention to market risk in trading book, to assess the potential impact on the Bank's business due to the unprecedented volatility in financial markets.

Methods used to measure market risk:

According to Bangladesh Bank guideline, Commercial Bank of Ceylon PLC, Bangladesh Operation is presently following the standardized approach for market risk under Basel III.

Market risk management system and policies and processes for mitigating market risk:

Bank has an independent market risk framework to assess, manage and control the risk management function, which is responsible for measuring market risk exposures in accordance with prescribed policies, and monitoring and reporting these exposures against the approved limits on a regular basis according to Bank's appetite for market risk.

Interest rate risk

Interest Rate Risk (IRR) is a major source of market risk and is unavoidable in any financial institution where the re-pricing of assets and liabilities are not identically matched. The ALCO of Bangladesh Operations manages the potential impact, which might be caused by the volatility of changes in the market interest rates and yield curves.

The securities (Treasury bills/bonds) acquired with the intention to trade by taking advantage of short-term price and interest rate movement is classified under the trading book. The marked to market (MTM) of securities in the trading book is done at market value as per the Bangladesh Bank guidelines.

Foreign exchange risk

All foreign exchange exposures and related risks are reviewed by the ALCO monthly, which provides additional guidance to treasury dealing room in managing the risks. This is to ensure that any adverse exchange rate movements on the results of the Bank due to unhedged foreign exchange positions are restrained within acceptable parameters.

In addition to regular revaluation of spot position and forward positions, Value at Risk (VaR) is calculated/exercised for FX portfolio. VaR provides a single number to the management that reflects the maximum loss, which can occur within a confidence level over a certain period of time.

Market risk on Trading Book

Amounts in BDT

The capital requirements for:

- A. Interest Rate Risk
- B. Equity Position Risk
- C. Foreign Exchange Risk
- D. Commodity Risk

1,135,430
-
47,995,220
-
49,130,650

3.7 Operational risk

Qualitative disclosure

Views of BOD on system to reduce operational risk

Operational risk is inherent to all products, activities, processes and systems and is generated in all business and support areas. For this reason, all employees are responsible for managing and controlling the operational risks generated in their area of action. In order to reduce and manage the operational risk of the Bank, Management Committee has implemented the Operational Risk Management framework approved by the BOD.

Performance gap of executives and staffs

Performance of employees is critically important to achieve organizational goals. Bank has put in place a well defined performance management process which aims to clarify what is expected from its different level of employees as well as how it is to be achieved. At the beginning of a year objectives is communicated to the employees who includes what are expected from him/her during the ensuing period through their direct reporting heads. A half yearly and yearly performance appraisal practices are in place to review achievements based on which rewards and recognition decisions are made.

Potential external events

By its nature, Operational Risk cannot be totally eliminated. Like other Banks, our Bank also operates its business with few external risk factors relating to the socio-economic condition, political atmosphere, regulatory policy changes, technological changes, natural disaster, external frauds etc. However, Bank has established methodology which defines the Bank's approach in identifying, assessing, mitigating, monitoring and reporting such operational risks factors which may impact the achievement of the Bank's business objectives.

Policies and processes for mitigating operational risk

Operational Risk Management in the Bank is governed by the well-defined Operational Risk Management Policy that is clearly communicated across the Bank. Bank adopts three lines of defence for management of operational risk, the first line of defence represented by various heads of the departments, different business unit/or support unit; second line of defence is represented by the Operational Risk Unit under IRMD to oversee the operational risk management, and the third line of defence represented by Inspection & Audit Division which is challenge function to the first two lines of defence.

Approach for calculating capital charge for operational risk

Presently Bank is following the Basic Indicator Approach (BIA) for calculating its operational risk capital charge and at 31 December 2019 Bank's operational risk capital requirement was Tk. 48.13 crore which was adequately maintained.

Quantitative Disclosure

Amounts in BDT

Capital requirements for operational risk is

481,303,427

3.8 Liquidity ratio

Qualitative disclosure

Views of BOD on system to reduce liquidity risk

Banks in general are vulnerable to liquidity and solvency problems resulting from asset and liability mismatches. Therefore, the principle objective in liquidity risk management is to assess the need for funds to meet obligations and to ensure the availability of adequate funding to fulfil those needs at the appropriate time, both under normal and stressed conditions. In order to reduce and manage the liquidity risk of the Bank, MANCOM has implemented the liquidity risk management framework approved by the BOD.

Methods used to measure liquidity risk

Bank uses numerous methods to assess/measure its liquidity risk e.g. through gap analysis for maturity mismatch based on residual maturity in different time buckets as well as various liquidity ratios and management of the same is done within the prudential limits fixed thereon. Advance techniques such as stress testing, simulation, sensitivity analysis etc. are used on regular intervals to draw the contingency funding plan under different liquidity scenarios.

Liquidity risk management system

Bank continuously analyses and monitors its liquidity profile, maintains an adequate margin of safety in high quality liquid assets and access to diverse funding sources such as inter-Bank market, assets and investments available-for-sale and has contingency funding plan to meet liquidity requirements. Bank thereby ensures availability of adequate liquidity to fund its existing asset base and grow its business whilst maintaining sufficient liquidity buffers to operate smoothly under varying market conditions including any short-term, medium or long-term market disruptions.

Policies and processes for mitigating liquidity risk

Bank has put in place its Asset Liability Management Policy, Contingency Funding Plan duly approved by the board and ALCO is managing the liquidity risk of the Bank.

Quantitative Disclosure

Amounts in BDT

Liquidity coverage ratio	558.05%
Net stable funding ratio	116.12%
Stock of high quality liquid assets	12,679,289,000
Total net cash outflows over the next 30 calendar days	2,272,070,424
Available amount of stable funding	49,038,340,900
Required amount of stable funding	42,230,817,600

3.9 Leverage ratio

Qualitative disclosure

Views of BOD on system to reduce excessive leverage

High leverage levels can lead to an excessive expansion of Bank asset size, which maximizes, in the short to medium term, Banks' return on equity. At the same time, leverage-fuelled Bank capital structures increase Bankruptcy risk, since they are an important cause of Bank failures. Therefore, to reduce excessive leverage and to manage the overall asset-liability position, management has implemented BOD approved ALM framework within the Bank.

Policies and processes for managing excessive on and off-balance sheet leverage

Bank has clearly laid down policy and procedure to manage its exposure level (both on and off-balance sheet) enumerated in its Asset Liability Management policy. Leverage parameter of the policy acts as a credible supplementary measure to the risk based capital requirement to control the leverage of the Bank. This reflects Bank's tier 1 capital over total exposure of the Bank. Reference level of leverage ratio is currently 3% (minimum).

Approach for calculating exposure

Leverage ratio of the Bank is calculated in line with the RBCA Guideline of BB. As at 31st December 2019 Bank's leverage ratio was 15.80% and it was calculated as follows:

	Measured used	Description
Numerator	Tier 1 Capital	Tier 1 capital constitutes the components specified in the
Denominator	Exposure	This is an approximation to the credit risk exposure used for

Quantitative Disclosure

	Amounts in BDT
Leverage ratio	15.77%
On balance sheet exposure	63,248,098,434
Off balance sheet exposure	8,057,649,779
Total exposure	71,305,748,213
Less: Regulatory adjustments	152,664,385
Total exposure for the purpose of leverage ratio	<u>71,153,083,828</u>

3.10 Remuneration

Information relating to the bodies that oversee remuneration

The Bank is dedicated to uphold the principle of equality in offering our employees both career opportunities and competitive remuneration at an excellent working condition in compliance with relevant laws and rules. Considering the gravity of importance the Bank has a Human Resource Steering Committee reporting to the Management Committee, which oversee the remuneration related policies and practices under the direct supervision of Remuneration Committee at Head Office in Sri Lanka.

Name, composition and mandate of the main body overseeing remuneration.

Country Manager, Chief Operating Officer, Senior General Manager, Financial Controller & Head of Human Resource administers the Banks remuneration policies. They play an independent role, operating as an overseer, and if necessary, make recommendations to the Board of Director (Sri Lanka) of the Bank for it's consideration and final approval for any remuneration related policy. They also assist the Board of Directors to ensure that all employees are remunerated fairly and get performance based compensation.

External consultants whose advice has been sought, the body by which they were commissioned and in what areas of the remuneration process.

In 2015 to study the market situation and compare the salaries up to a certain level of employees the Bank had appointed Cerebrus Consultants Pt. Ltd., Mumbai, India. The Bangladesh Management of the Bank has commissioned this company.

A description of the scope of the Bank's remuneration policy (e.g. by regions, business lines), including the extent to which it is applicable to foreign subsidiaries and branches.

The Bank does not discriminate employees and/or differentiate employee remunerations by gender, nationality, religion, race, caste etc. The Bank even does not differentiate the remuneration considering the business lines and/or considering the functions known as revenue generating activities or revenue-prone work force. Bank maintains the same Remuneration Package and apply Human Resource policies for all of its branches, departments and Units.

A description of the types of employees considered as material risk takers and as senior managers, including the number of employees in each group.

Employees considered as material risk takers and as senior managers are:

Material Risk Takers	Composition	Number of
Senior Managers	Members of Management Committee(CM, COO, SGM,	7
Other material risk takers	Head of Branches and SME Centres	16
	Head of Units, Corporate Banking	5
	Head of Departments, Units	13
Total		41

Information relating to the design and structure of remuneration processes

Bank is committed to maintain an equitable and consistent reward structure to ensure that employees’ contributions to the business are recognized in different ways. This helps us to attract and retain staff while encouraging their efforts towards the achievement of the Bank’s strategic goals. In view of that Bank is maintaining a fair remuneration policy in line with the Market Standard. Bank believes that employee remuneration should not be inconsistent with the market and the employees should be provided with the other standard benefits and facilities that commensurate the best in the industry. Bank has been maintaining the Objectives based Performance Appraisal of the employees and provides the annual increment and incentive bonus on the basis of their performance and achievement of objectives.

The ways in which current and future risks are taken into account in the remuneration processes

The overall compensation package and its structure have to be competitive, making it easier to attract, keep and reward the employees properly. While doing so Bank has considered the following key risks to implement remuneration measures:

- i. Staff turnover rate
- ii. Identifying the future leaders
- iii. Market standard of salary and benefits
- iv. Achievement of objectives leading the overall achievement of Bank’s target
- v. Succession plan

Keeping in mind the above risk aspects Bank used to identify the potential employees i.e. the future leaders and arranges necessary training for those employees both at home and abroad. In a few cases the Bank also looked at accelerated career advancement of the employees who are identified as potential employees and shown the capacity as future leaders. Outstanding employees used to get Incentive bonus and salary increment at the rate of the best in the scheme which all together have impact on the remuneration as a whole.

The ways in which Bank seeks to link performance during a performance measurement period

Annual budget of the Bank is the main growth factors for performance measurement such as Advance, Deposit and Profitability is being distributed among the top level business lines and individuals. On achievement of targets for these broad factors Bank achieves its growth in terms of revenue and size of balance sheet. Bank’s overall success depends on the success of top level business lines and individuals. Following performance matrix is used to determine the level of Performance Rating of the individual:

O =	Outstanding	This person is an Outstanding Performer, is competent, committed, performance driven and is relatively better than a person rated “Excellent”.
EX =	Excellent	This person is an Excellent Performer, regularly exceeds requirements in most significant aspects of the job and is relatively better than a person rated “Very Good”
VG =	Very Good	This person is rated as Very Good Performer, performs the job in a completely expectable manner and relatively better than a person rated “Good”
G =	Good	This person is rated as Good and relatively better than a person rated “Below Expectation
BE =	Below Expectations	This person is rated as Below Expectations and relatively better than a person rated “Marginal”
Mg =	Marginal	This person is rated as Marginal and displays Marginal Performance as against others.

The employee performance is being evaluated on the basis of achievement of objectives set upon discussion between the job holder and the Supervisor at the beginning of the year on agreed basis. On achievement of targets of top level business lines and individuals Bank achieves the budgeted profitability and announces the annual incentive bonus which is known as Annual Performance Bonus. Any individual having proven achievements of targets get recognition through the Performance Ratings done by the Supervisor in agreement with the job holder. The higher the ratings are the higher the Bonuses are paid and Increments are awarded.

Different forms of variable remuneration

Bank's overall remuneration can be bifurcated in to two groups i.e. fixed remuneration and variable remuneration. Variable remuneration is comprised of the performance bonus and the rate of salary increment decided based on the performance rating of the employee for the preceding year.

Quantitative Disclosure

Quantitative disclosures reflect remuneration payment for senior managers and material risk takers of the Bank during the financial year.

Number of meetings held by the main body overseeing remuneration during the financial year	3
Remuneration paid to the member of the main body overseeing remuneration during the financial year	Nil*

*We do not have any system of paying remuneration for attending meeting

Particulars	No. of employee	Amounts in BDT
Variable remuneration awarded	41	58,787,402
Guaranteed bonuses awarded	41	10,351,724
Sign-on awards	-	-
Severance payments	2	8,373,664

Particulars	BDT
Outstanding deferred remuneration:	
Cash	-
Shares and share-linked instruments and	-
Other forms	-
Deferred remuneration paid out	-

Details of remuneration awards	Cash	Shares and share-linked instruments	Other forms
Fixed	137,515,028		-
Variable	58,787,402		-
Deferred and non-deferred	-		-

Employees' exposure to implicit (e.g. fluctuations in the value of shares or performance units) and explicit adjustments (e.g. clawbacks or similar reversals or downward revaluations of awards) of deferred remuneration and retained remuneration.

Particulars	BDT
Total amount of outstanding for deferred remuneration and retained remuneration exposed to ex-post explicit	-
Total amount of reductions during the financial year due to ex-post explicit adjustments	-