Standard Bank Limited
Head office
Risk Management Division

Disclosures on Risk Based Capital (Basel-III) based on 31.12.2018

(a) Scope of Application

Qualitative Disclosure	(a)	The Revised Risk Based Capital Adequacy (RBCA) framework which is called Basel-III guideline issued by Bangladesh Bank in December-2014 duly applies to Standard Bank Limited.
	(b)	Standard Bank Limited prepared its RBCA report on 'Solo Basis' as well as 'Consolidated Basis' where four (04) subsidiaries belong to Standard Bank Ltd.
	(c)	No incidence occurred which may cause for imposing any regulatory restriction or impediment for transferring fund within the Standard Bank group.
Quantitative Disclosure	(d)	No Capital deficiency in solo or consolidated assessment.

(b) Capital Structure

Qualitative Disclosure	(a)	The regulatory capital of bank has been classified into two tiers which is consisted of sum of the following categories: **1) Tier 1 Capital (going-concern capital)** a) Common Equity Tier 1 b) Additional Tier 1 **2) Tier 2 Capital (gone-concern capital)** **a) Common Equity Tier 1 Capital** Common Equity Tier 1 (CET1) capital consist of sum of the following items: 1) Paid up capital 2) Non-repayable share premium account 3) Statutory reserve 4) General reserve 5) Retained earnings 6) Dividend equalization reserve 7) Minority interest in subsidiaries 8) Others **Less:** Regulatory adjustments applicable on CET1 capital: 1) Shortfall in provisions against NPLs and Investments 2) Goodwill and all other Intangible Assets 3) Deferred tax assets (DTA) 4) Defined benefit pension fund assets 5) Gain on sale related to securitization transactions 6) Investment in own CET-1 instruments/shares 7) Reciprocal crossholdings in the CET-1 Capital of Banking, Financial and Insurance Entities 8) Any investment exceeding the approved limit under section 26 ka(1) of Bank company Act-1991 (50% of investment) 9) Investment in Subsidiaries which are not consolidated (50% of investment) 10) Other if any **b) Additional Tier 1 Capital (AT-1)** Additional Tier 1 (AT1) capital consist of the following items: 1) Non-cumulative irredeemable preference shares 2) Instruments issued by the banks that meet the qualifying criteria for AT1 as specified in the guideline. 3) Minority Interest i.e. AT1 issued by consolidated subsidiaries to third parties (for consolidated reporting only) 4) Others **Less:** Regulatory adjustments applicable on AT1 Capital: 1) Investment in own AT-1 instruments/shares

		2) Reciprocal crossholdings in the AT-1 Capital of Banking, Financial and Insurance Entities 3) Other if any **2) Tier 2 Capital (T-2)** Tier 2 capital, also called 'gone-concern capital', represents other elements which fall short of some of the characteristics of the core capital but contribute to the overall strength of a bank. Tier 2 capital consist of the following items: 1) General Provisions (Eligible for inclusion in Tier 2 will be limited to a maximum 1.25 percentage points of credit risk-weighted assets calculated under the standardized approach) 2) All other preference shares 3) Subordinated debt / Instruments issued by the banks that meet the qualifying criteria for Tier 2 capital as specified in the guideline. 4) Minority Interest i.e. Tier-2 issued by consolidated subsidiaries to third parties as specified in the guideline. 5) Revaluation Reserves as on 31 December, 2014 (50% of Fixed Assets and Securities and 10% of Equities) 6) Others **Less:** Regulatory adjustments applicable on Tier-2 capital: 1) Revaluation Reserves for Fixed Assets, Securities and Equity Securities (follow phase-in deductions as per Basel-III). 2) Investment in own T-2 instruments/shares 3) Reciprocal crossholdings in the T-2 Capital of Banking, Financial and Insurance Entities. 4) Any investment exceeding the approved limit under section 26 ka(1) of Bank company Act-1991 (50% of investment). 5) Investment in Subsidiaries which are not consolidated (50% of investment) 6) Others if any The calculation of Common Equity Tier-1 , Additional Tier-1,Tier-1 and Tier-2 capital shall be subject to the following conditions: 1) Common Equity Tier 1 of at least 4.5% of the total RWA. 2) Tier-1 capital will be at least 6.0% of the total RWA. 3) Minimum CRAR of 10% of the total RWA. 4) Additional Tier 1 capital can be admitted maximum up to 1.5% of the total RWA or 33.33% of CET1, whichever is higher. 5) Tier-2 capital can be admitted maximum up to 4.0% of the total RWA or 88.89% of CET1, whichever is higher. 6) In addition to minimum CRAR, Capital Conservation Buffer (CCB) of 2.5% of the total RWA is being introduced which will be maintained in the form of CET1.
Quantitative Disclosure		The quantitative disclosure of Capital Structure are as follows:

Tier 1 Capital (going-concern capital)				
	Common Equity Tier 1 Capital (CET1)		**SOLO**	**Consolidated**
1.1	Fully Paid-up Capital		870.99	870.99
1.2	Non-repayable Share premium account		0.00	0.00
1.3	Statutory Reserve		501.69	501.69
1.4	General Reserve		0.00	0.00
1.5	Retained Earnings		94.90	93.43
1.6	Dividend Equalization Reserve		0.00	0.00
1.7	Minority interest in Subsidiaries		0.00	0.00
1.9	Other if any (if any item approved by BB)		0.00	0.00

1.10	**Sub-Total: (1.1 to 1.9)**		**1,467.58**	**1,466.11**
	Less: Regulatory adjustments applicable on CET1			
1.11	Shortfall in provisions required against Non Performing Loans (NPLs)		444.69	444.69
1.12	Shortfall in provisions required against investment in shares		0.00	0.00
1.13	Remaining deficit on account of revaluation of investment in securities after netting off from any other surplus on the securities		0.00	0.00
1.14	Goodwill and all other intangible assets		4.30	4.46
1.15	Deferred tax assets (DTA)		0.00	0.00
1.16	Defined benefit pension fund assets		0.00	0.00
1.17	Gain on sale related to securitization transactions		0.00	0.00
1.18	Investment in own CET-1 instruments/shares		0.00	0.00
1.19	Reciprocal crossholdings in the CET-1 Capital of Banking, Financial and Insurance Entities		0.00	3.24
1.20	Any investment exceeding the approved limit under section 26 ka(1) of Bank company Act-1991 (50% of investment)		0.00	0.00
1.21	Investment in Subsidiaries which are not consolidated (50% of investment)		0.00	0.00
1.22	Other if any		0.00	0.00
1.23	**Sub-Total (1.11 to 1.22)**		**448.99**	**452.39**
1.24	**Total Common Equity Tier-1 (1.10 -1.23)**		**1,018.59**	**1,013.72**
	Additional Tier 1 Capital			
2.1	Non-cumulative irredeemable preference shares		0.00	0.00
2.2	Instruments issued by the bank that meets the qualifying criteria for AT1		0.00	0.00
2.3	Minority Interest i.e. AT1 issued by consolidated subsidiaries to third parties (for consolidated reporting only)		0.00	0.00
2.4	Others		0.00	0.00
2.5	**Sub-Total (2.1 to 2.4)**		0.00	0.00
Less: Regulatory adjustments applicable on AT1 Capital				
2.5	Investment in own AT-1 instruments/shares		0.00	0.00
2.6	Reciprocal crossholdings in the AT-1 Capital of Banking, Financial and Insurance Entities		0.00	0.00
2.7	Other if any		0.00	0.00
2.8	**Sub-Total (2.5 to 2.7)**		**0.00**	**0.00**
2.9	**Total Additional Tier 1 Capital (2.5 – 2.8)**		**0.00**	**0.00**
2.10	**Total Eligible Tier-1 Capital (1.24 + 2.9)**		**1,018.59**	**1,013.72**
Tier 2 Capital (gone-concern capital)				
3.1	General Provisions (Eligible for inclusion in Tier 2 will be limited to a maximum 1.25 percentage points of credit risk-weighted assets calculated under the standardize approach)		158.72	158.72
3.2	All other preference shares		0.00	0.00
3.3	Subordinated debt / Instruments issued by the banks that meet the qualifying criteria for Tier 2 capital as specified in the guideline.		520.00	520.00
3.4	Minority Interest i.e. Tier-2 issued by consolidated subsidiaries to third parties as specified in the guideline.		0.00	0.00

3.5	Revaluation Reserves as on 31 December, 2014 (50% of Fixed Assets and Securities and 10% of Equities)		1.31	1.31
3.6	Other if any (if any item approved by BB)		0.00	0.00
3.7	**Sub-Total (3.1 to 3.6)**		**680.03**	**680.03**
3.8	**Less: Regulatory adjustments applicable on Tier-2 capital**			
3.9	Revaluation Reserves for Fixed Assets, Securities and Equity Securities (follow phase-in deductions as per Basel-III).		1.05	1.05
3.10	Investment in own T-2 instruments/shares		0.00	0.00
3.11	Reciprocal crossholdings in the T-2 Capital of Banking, Financial and Insurance Entities.		0.00	0.00
3.12	Any investment exceeding the approved limit under section 26 ka(1) of Bank company Act-1991 (50% of investment).		0.00	0.00
3.13	Investment in Subsidiaries which are not consolidated (50% of investment)		0.00	0.00
3.14	Other if any		0.00	0.00
3.15	**Sub-Total (3.9 to 3.14)**		**1.05**	**1.05**
3.16	**Total Eligible Tier-2 Capital (3.7 – 3.15)**		**678.98**	**678.98**
	Total Elegible Capital (Tier-1+Tier-2)(2.10+3.16)		**1,697.57**	**1,692.70**

(c) Capital Adequacy

Qualitative Disclosure	(a)	Adequate capital means enough capital to compensate with Bank's risks profile. For assessing overall risk profile and a strategy for maintaining adequate capital, Bank has followed an Internal Capital Adequacy Assessment Process (ICAAP) which is issued by Bangladesh Bank for calculating adequate capital under Supervisory Review Process (SRP) of Basel-III. Bank has strengthened its risk management process and internal control system in assessing and planning of economic capital against all risks. The strategic planning process critically analyzes bank's current and future capital requirements. The strategic plan includes the bank's capital needs, anticipated capital expenditures, desirable capital level, and external capital sources.	**Solo**	**Consolidated**
Quantitative Disclosure	(b)	Capital Requirement for Credit Risk	1,607.59	1,587.56
	(c)	Capital Requirement for Market Risk	22.58	56.69
	(d)	Capital Requirement for Operational Risk	51.13	54.00
	(e)	Total Capital, CET-1 Capital, Total Tier-1 Capital and Tier-2 Capital Ratio: • For the consolidated group: ➢ Total CRAR 9.97% ➢ CET-1 Capital Ratio 5.97% Total Tier-1 Capital Ratio 5.97% ➢ Tier-2 Capital Ratio 4.00% • For stand alone: ➢ Total CRAR 10.10% ➢ CET-1 Capital Ratio 6.06% ➢ Total Tier-1 Capital Ratio 6.06% Tier-2 Capital Ratio 4.04%		
	(f)	Capital Conservation Buffer- • For the consolidated group: BDT 318.42 crore (1.875% of		

		Total RWA) • For stand alone: BDT 315.24 crore (1.875% of Total RWA)
	(g)	Available Capital under Pillar-2 requirement---- BDT 1643.48 Crore as on 31.12.2017. Based on 31.12.2018 it is not calculated yet, it will be calculated within 31.05.2019.

(d) Credit Risk

Qualitative Disclosure	(a)	➢ **Definition of past due and impaired (for accounting purposes):** A customer will be considered to be past due once a repayment becomes overdue. **Past due and impaired:** In instances in which a customer is past due and for whom the furnished collateral is insufficient to cover the outstanding amount will be considered to be both past due and impaired. Accordingly, impairment will be raised in line with the impairment policy for the relevant accounts. **Past due but not impaired:** In instances in which a customer is past due, but the customer's facilities are fully collateralized, no impairment will be raised and the customer will be considered past due, but not impaired. A Continuous loan, Demand loan or a Term Loan which will remain overdue for a period of 02 (two) months or more, will be put into the "Special Mention Account (SMA)". This will help banks to look at accounts with potential problems in a focused manner and it will capture early warning signals for accounts showing first sign of weakness. Loans in the "Special Mention Account (SMA)" will have to be reported to the Credit Information Bureau (CIB) of Bangladesh Bank. Any continuous loan will be classified as: i. ***'Sub-standard'*** if it is past due/overdue for 03 (three) months or beyond but less than 06 (six) months. ii. ***'Doubtful'*** if it is past due/overdue for 06 (six) months or beyond but less than 09 (nine) months iii. ***'Bad/Loss'*** if it is past due/overdue for 09 (nine) months or beyond. Any Demand Loan will be classified as: i. ***'Sub-standard'*** if it remains past due/overdue for 03 (three) months or beyond but not over 06 (six) months from the date of expiry or claim by the bank or from the date of creation of forced loan. ii. ***'Doubtful'*** if it remains past due/overdue for 06 (six) months or beyond but not over 09 (nine) months from the date of expiry or claim by the bank or from the date of creation of forced loan. iii. ***'Bad/Loss'*** if it remains past due/overdue for 09 (nine) months or beyond from the date of expiry or claim by the bank or from the date of creation of forced loan. In case of any installment(s) or part of installment(s) of a Fixed Term Loan amounting upto BDT 10.00 Lacs is not repaid within the due date, the amount of unpaid installment(s) will be termed as 'past due or overdue installment'. In case of such types of Fixed Term Loans: i. If the amount of past due installment is equal to or more than the amount of installment(s) due within 06 (six) months, the entire loan will be classified as **"Sub-standard"**. ii. If the amount of past due installment is equal to or more than the amount of installment(s) due within 09 (nine) months, the entire loan will be classified as **"Doubtful"**. iii. If the amount of past due installment is equal to or more than

		the amount of installment(s) due within 12 (twelve) months, the entire loan will be classified as **"Bad/Loss"**. In case of any installment(s) or part of installment(s) of a Fixed Term Loan is not repaid within the due date, the amount of unpaid installment(s) will be termed as 'past due or overdue installment'. In case of Fixed Term Loans: - i. If the amount of past due installment is equal to or more than the amount of installment(s) due within 03 (three) months, the entire loan will be classified as **"Sub-standard"**. ii. If the amount of past due installment is equal to or more than the amount of installment(s) due within 06 (six) months, the entire loan will be classified as **"Doubtful"**. iii. If the amount of 'past due installment is equal to or more than the amount of installment(s) due within 09 (nine) months, the entire loan will be classified as **"Bad/Loss"**. Explanation: If any Fixed Term Loan is repayable on monthly installment basis, the amount of installment(s) due within 06 (six) months will be equal to the sum of 06 monthly installments. Similarly, if the loan is repayable on quarterly installment basis, the amount of installment(s) due within 06 (six) months will be equal to the sum of 2 quarterly installments. ➢ **Description of approaches followed for specific and general allowances and statistical methods** As per relevant Bangladesh bank guidelines, 1% to 5% provision is maintained against good/ standard loans, 5% provision is maintained against SMA loans, 20% provision is maintained against sub - standard loans, 50% provision is maintained against doubtful loans and 100% provision is maintained against bad / loss loans after deducting value of eligible security, if any, as per Bangladesh Bank guidelines. All interest is suspended /discontinued if the loan is identified as SMA or classified as sub -standard, doubtful or bad /loss. ➢ **Discussion of the Bank's credit risk management policy** The Board approves the credit policy keeping in view relevant Bangladesh Bank guidelines to ensure best practice in credit risk management and maintain quality of assets, Authorities are properly delegated ensuring check and balance in credit operation at every stage i,e screening , assessing risk, identification, management and mitigation of credit risk as well as monitoring, supervision and recovery of loans with provision for early monitoring, supervision and recovery of loans with provision for early warning system. The credit risk management division is independently operated for dedicated credit risk management, separate credit administration division for ensuring perfection of security coverage and credit monitoring and recovery division for monitoring and recovery of irregular loans. Besides, Internal control & compliance division independently assess quality of loans and compliance status of loans at least once in a year. Adequate provision is maintained against classified loans as per Bangladesh Bank guidelines. Status of loan portfolios is being regularly reported to the Board /Executive Committee.	
Quantitative Disclosure	(b)	**Total gross credit risk exposures broken down by major types of credit exposure:**	BDT in Crore
		Secured overdraft/Quard against TDR	2,108.75
		Term Loan	3,923.58
		Export Development Fund (EDF)	446.36
		Agriculture Loan	586.56
		Cash credit/ Murabaha	1,568.00
		House Building loans	293.40

		Transport Loans	118.27
		Loans against trust receipt	739.14
		Payment against document	87.52
		Packing credit	57.03
		Demand Loan	940.80
		Lease Finance / Izara	124.21
		Syndicate/Club Finance	266.55
		VISA Credit Card	58.50
		SME/SE	2,503.88
		Green Finance	1.42
		Consumer Credit Scheme/Hire purchase	69.22
		Bills Purchased and Discounted (Local and Foreign)	479.86
		Total	**14,373.05**
	(c)	**Geographical distribution of exposures, broken down in significant areas by major types of credit exposure:**	BDT in Crore
		<u>Urban:</u>	9,405.07
		Dhaka Division	2,418.41
		Chittagong Division	704.30
		Khulna Division	39.22
		Barishal Division	510.86
		Rajshahi Division	497.63
		Rangpur Division	41.50
		Sylhet Division	24.25
		Mymensing Division	**13,641.23**
		Total	
		<u>Rural:</u>	
		Dhaka Division	491.42
		Chittagong Division	85.71
		Khulna Division	14.84
		Barishal Division	-
		Rajshahi Division	44.98
		Rangpur Division	57.97
		Sylhet Division	13.27
		Mymensing Division	23.63
		Total	**731.81**
		Grand Total (urban + rural)	**14,373.05**

	(d)	**Industry or counterparty types distribution of exposures broken down by major types of credit exposure:**	BDT in Crore
		Commercial lending	3,154.12
		Export financing	212.17
		House building loan	252.05
		Consumers Credit Scheme	27.29
		Small and medium enterprises	2,503.88
		Special program loan	12.53
		Other Loans and advances/Investments	645.69
		Total	**6,807.73**
		Industrial loans:	
		Agricultural Industries	410.66
		Textile Industries	1,188.07
		Food and allied Industries	1,180.88
		Pharmaceuticals Industries	43.93
		Leather, Chemical and Cosmetics etc	45.38
		Cement and Ceramic Industries	195.97
		Service Industries	1,228.16
		Transport and Communication Industries	588.95
		Other Industries	2,562.29
		Total	**7,444.29**
	(e)	**Residual contractual maturity breakdown of the whole portfolio broken down by all types of credit exposure including bill purchased & discounted:**	BDT in Crore
		Payable On demand	--------
		Up to one month	1,639.06
		Over one month but not more than three months	1,825.03
		Over three months but less than one year	5,125.73
		Over one year but less than five years	4,539.55
		Above five years	1,243.68
	(f)	**By major industry or counterparty type :**	BDT in Crore
		Amount of impaired loans and if available, past due loans, provided separately	
		Corporate	6,366.02
		SME	2,879.86
		Consumer Financing	214.81
		Others (Agri, SOD Individual)	4,912.36
		Specific and general provisions; and	55.01
		Charges for specific allowances and charge-offs during the period	
	(g)	**Gross Non performing Assets (NPAs)**	BDT in Crore
		Non performing Assets (NPAs) to Outstanding Loans & advances	1,135.96 7.90%
		Movement of Non Performing Assets (NPAs)	
		Opening balance	1045.14
		Additions	327.49
		Reductions	236.67
		Closing balance	1135.96
		Movement of specific provisions for NPAs	
		Opening balance	375.97
		Provisions made during the period	(48.83)
		Write-off	(100.04)
		Write-back of excess provisions	-
		Closing balance	227.10

(e) Equities: Disclosures for Banking Book Positions

Qualitative Disclosure	(a)	The general qualitative disclosure requirement with respect to the equity risk, including: The Bank does not hold any value which is describes as "Differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons" in RBCA Guidelines of Bangladesh bank. Therefore the Bank does not needed to narrate any "Discussion of important policies covering the valuation and accounting of equity holding in the banking book, This includes the accounting techniques and valuation methodologies used, including key assumptions and practices affecting valuation as well as significant changes in these practices". Apart from above, the Bank has being calculated **value at cost** method for Quoted shares & Unquoted shares.
Quantitative Disclosure	(b)	Value disclosed in the balance sheet of investments, as well as the fair value of those investments; for quoted securities, a comparison to publicly quoted share values where the share price is materially different from fair value. Cost Price Market Price Quoted shares BDT 15.71 BDT 11.41 Unquoted shares BDT 261.23 BDT 261.23
	(c)	The cumulative realized gain (losses) arising from sales and liquidations in the reporting period. Realized gain (losses) from equity investments
	(d)	Total unrealized gains (losses) – 0.00 Total latent revaluation gains (losses) - 0.00 Any amounts of the above included in Tier 2 Capital 0.00
	(e)	There are no Capital requirements broken down by appropriate equity groupings, consistent with the bank's methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory provisions regarding regulatory capital requirements.

(f) Interest Rate Risk in the Banking Book (IRRBB)

Qualitative Disclosure	(a)	The Banking Book consists of assets and liabilities contracted basically on account of relationship or for steady income and statutory obligations and are generally held till maturity/payment by counter party. The earnings or changes in the economic value are the main focus in banking book. Interest rate risk is the risk that a bank will experience deterioration in its financial position as interest rates move over time. Interest rate risk in the banking book arises from a bank's core banking activities. Interest rate risk is the exposure of a bank's financial condition to adverse movements in interest rates. Changes in interest rates affect a bank's earnings by changing its net interest income and the level of other interest sensitive income and operating expenses.

Quantitative Disclosure	(b)	**Interest Rate Risk -Increase in Interest Rate:**	**Minor**	**Moderate**	**Major**
		Magnitude of Shock	***1.00%***	***2.00%***	***3.00%***
		Net Interest Income impact			
		<12 Months	*-6.54*	*-13.09*	*-19.63*
		Capital after shock	2113.97	2107.42	2100.88
		CRAR aftershock (%) Change in CAR after shock (%)	12.96	12.92	12.88
		Re-pricing Impact			
		Change in the value of the bond portfolio	-113.77	-227.54	-341.31
		Capital after shock CRAR aftershock (%)	2000.2	1879.88	1759.57
		Change in CAR after shock (%)	12.27	11.53	10.79
		Overall change in CAR (NII & re-pricing impact, %)	-0.70	-1.4	-2.09

(g) Market Risk

Qualitative Disclosure	(a)	**Views of BOD on trading/investment activities:** Market risk is potential for loss resulting from adverse movement in market risk factors such as interest rates, For-ex rates, and equity and commodity prices. The important aspect of the Market Risk includes liquidity management, interest rate risk management and the pricing of assets and liabilities. There are three types of Market Risk such as Interest Rate Risk, Foreign Exchange Risk & Equity Price Risk. The Board will have to approve all policies related to market risk, sets limits and reviews compliance on a regular basis. **Method used to measure Market Risk:** In Standardized Approach, the capital requirement for various market risks (interest rate risk, equity price risk, commodity price risk, and foreign exchange risk) is determined separately. **Market Risk Management System:** The Treasury Division manage market risk covering Liquidity, interest rate and foreign exchange risk with oversight from Assets Liability Management Committee (ALCO) comprising senior executives of the Bank. ALCO is chaired by the Managing Director. ALCO meets at least once in a month. **Policies and Processes for mitigating market risk:** There are approved limits for credit deposit Ratio, liquid assets to total assets ratio, maturity mismatch, commitments for both on-balance sheet and off-balance sheet items and borrowing from money market and For-ex position. The limits are monitored and enforced on a regular basis to protect against market risk. The exchange rate committee of the Bank meets on a daily basis to review the prevailing market condition, exchange rate, For-ex position and transactions to mitigate foreign exchange risks.

Quantitative Disclosure	(b)	**The capital requirement for:**	**Solo**	**Consolidated**
		Interest rate risk	8.27	8.27
		Equity position risk	2.28	36.39
		Foreign exchange risk	12.02	12.02
		Commodity risk	0.00	0.00

(h) Operational Risk

Qualitative Disclosure	(a)	**Views of BOD on system to reduce Operational Risk:** Operational risk is associated with human error, system failures and inadequate procedures and controls. It is the risk of loss arising from the potential that inadequate information system; technology failures, breaches in internal controls, fraud, unforeseen catastrophes, or other operational problems may result in unexpected losses or reputation problems. Operational risk exists in all products and business activities. In addressing Operational Risk, Bank has been strengthened its Internal Control System, and ensure sound Corporate Governance in all sphere of Management and Operation level as well. The Bank should maintain a robust CBS (Core Banking Software) and enriches its IT infrastructure in terms of demand of time. Besides, in order to capacity building of its Human Resources Bank may be taken a number of steps like training, workshop etc. **Performance gap of executives and staffs:** SBL has a policy to provide competitive package and best working environment to attract and retain the most talented people available in the industry. SBL's strong brand image plays an important role in employee motivation. As a result there is no significant performance gap. **Potential external events:** No potential external events are expected to expose the Bank to significant operational risk. **Policies and Processes for mitigating operational risk:** To mitigate operational risk, Bank use basic indicator approach to calculate capital charge against operational risk. The policy for operational risks including internal control & compliance risk is approved by Board taking into account relevant guidelines of Bangladesh Bank. The Bank developed a Risk Management Division and supervisory review Committee for review and managing operation risk as well as evaluating of the adequacy of the capital. For mitigating operational risk Internal Control and compliance division undertakes periodical and special audit of the branches and departments at the Head Office for review of the operation and compliance of statutory requirements. **Approach for calculating capital charge for operational risk:** The Bank followed Basic Indicator Approach (BIA) for measuring capital charges for operational risk. Under the Basic Indicator Approach (BIA), the capital charge for operational risk is a fixed percentage (denoted by alpha) of average positive annual gross income of the Bank over the past three years.	
Quantitative Disclosure	(b)	**The Capital Requirement for Operational Risk (Solo)**	51.13
		The Capital Requirement for Operational Risk (Consolidated)	54.00

i) Liquidity Risk

Qualitative Disclosure	a)	**Views of BOD on system to reduce liquidity risk** The board of directors is ultimately responsible for the liquidity risk assumed by the bank and the manner in which this risk is managed and therefore should establish the bank's liquidity risk tolerance. The tolerance, which should define the level of liquidity risk that the bank is willing to assume, should be appropriate for the business strategy of the bank and its role in the financial system and should reflect the bank's financial condition and funding capacity.

		The prerequisites of an effective liquidity risk management include an informed board, capable management, staff having relevant expertise and efficient systems and procedures. It is primarily the duty of board of directors to understand the liquidity risk profile of the bank and the tools used to manage liquidity risk. The board has to ensure that the bank has necessary liquidity risk management framework and bank is capable of confronting uneven liquidity scenarios. Generally speaking the board of a bank is responsible: a) To position bank's strategic direction and tolerance level for liquidity risk. b) To appoint senior managers who have ability to manage liquidity risk and delegate them the required authority to accomplish the job. c) To continuously monitors the bank's performance and overall liquidity risk profile. d) To ensure that liquidity risk is identified, measured, monitored, and controlled. Senior management is responsible for the implementation of sound policies and procedures keeping in view the strategic direction and risk appetite specified by board. To effectively oversee the daily and long-term management of liquidity risk senior managers should: a) Develop and implement procedures and practices that translate the board's goals, objectives, and risk tolerances into operating standards that are well understood by bank personnel and consistent with the board's intent. b) Adhere to the lines of authority and responsibility that the board has established for managing liquidity risk. c) Oversee the implementation and maintenance of management information and other systems that identify, measure, monitor, and control the bank's liquidity risk. d) Establish effective internal controls over the liquidity risk management process. **Method used to measure Liquidity risk** **1)** Contractual maturity mismatch: The contractual maturity mismatch profile identifies the gaps between the contractual inflows and outflows of liquidity for defined time bands. These maturity gaps indicate how much liquidity a bank would potentially need to raise in each of these time bands if all outflows occurred at the earliest possible date. This metric provides insight into the extent to which the bank relies on maturity transformation under its current contracts. **2)** Concentration of funding: This metric is meant to identify those sources of wholesale funding that are of such significance that withdrawal of this funding could trigger liquidity problems. The metric thus encourages the diversification of funding sources recommended in the Committee's *Sound Principles*. **3)** Available unencumbered assets: These metrics provide supervisors with data on the quantity and key characteristics, including currency denomination and location, of banks' available unencumbered assets. These assets have the potential to be used as collateral to raise additional HQLA or secured funding in secondary markets or are eligible at central banks and as such may potentially be additional sources of liquidity for the bank. **4)** LCR by significant currency: While the LCR is required to be met in one single currency, in

order to better capture potential currency mismatches, banks and supervisors should also monitor the LCR in significant currencies. This will allow the bank and the supervisor to track potential currency mismatch issues that could arise.

5) Market-related monitoring tools:

High frequency market data with little or no time lag can be used as early warning indicators in monitoring potential liquidity difficulties at banks.

Liquidity risk management system

The liquidity risk strategy defined by board should enunciate specific policies on particular aspects of liquidity risk management, such as:

a. Composition of Assets and Liabilities
b. Diversification and Stability of Liabilities.
c. Access to Inter-bank Market

The liquidity strategy must be documented in a liquidity policy, and communicated throughout the bank. The responsibility for managing the overall liquidity of the bank should be delegated to a specific, identified group within the bank. This might be in the form of an Asset Liability Committee (ALCO) comprised of senior management, the treasury function or the risk management department. However, usually the liquidity risk management is performed by an ALCO. Ideally, the ALCO should comprise of senior management from each key area of the institution that assumes and/or manages liquidity risk.

An effective liquidity risk management includes systems to identify, measure, monitor and control its liquidity exposures. Management should be able to accurately identify and quantify the primary sources of a bank's liquidity risk in a timely manner. To properly identify the sources, management should understand both existing as well as future risk that the institution can be exposed to. Management should always be alert for new sources of liquidity risk at both the transaction and portfolio levels. 4.5.2 Key elements of an effective risk management process include an efficient MIS, systems to measure, monitor and control existing as well as future liquidity risks and reporting them to senior management.

Policies and processes for mitigating liquidity risk

An effective measurement and monitoring system is essential for adequate management of liquidity risk. Discussed below are some (but not all) commonly used liquidity measurement and monitoring techniques that may be adopted by the banks. Contingency Funding Plans 4.7.2 In order to develop a comprehensive liquidity risk management framework, institutions should have way out plans for stress scenarios. Such a plan commonly known as Contingency Funding Plan (CFP) is a set of policies and procedures that serves as a blue print for a bank to meet its funding needs in a timely manner and at a reasonable cost. A CFP is a projection of future cash flows and funding sources of a bank under market scenarios including aggressive asset growth or rapid liability erosion. To be effective it is important that a CFP should represent management’s best estimate of balance sheet changes that may result from a liquidity or credit event. A CFP can provide a useful framework for managing liquidity risk both short term and in the long term. Further it helps ensure that a financial institution can prudently and efficiently manage routine and extraordinary fluctuations in liquidity.

		Use of CFP for Routine Liquidity Management a) A reasonable amount of liquid assets are maintained. b) Measurement and projection of funding requirements during various scenarios. c) Management of access to funding sources. **Use of CFP for Emergency and Distress Environments** Not necessarily a liquidity crisis shows up gradually. In case of a sudden liquidity stress it is important for a bank to seem organized, candid, and efficient to meet its obligations to the stakeholders. Since such a situation requires a spontaneous action, banks that already have plans to deal with such situation could address the liquidity problem more efficiently and effectively. A CFP can help ensure that bank management and key staffs are ready to respond to such situations. **Scope of CFP** To begin, the CFP should anticipate all of the bank's funding and liquidity needs by: a) Analyzing and making quantitative projections of all significant on- and off-balance-sheet funds flows and their related effects. b) Matching potential cash flow sources and uses of funds. c) Establishing indicators that alert management to a predetermined level of potential risks.	
Quantitative Disclosures	b)	Liquidity coverage ratio (LCR)	101.17%
		Net stable Funding Ratio (NSFR)	110.07%
		Stock of High quality liquid assets	BDT 3,056.81
		Total net cash outflows over the next 30 calendar days	BDT 3,021.45
		Available amount of stable funding	BDT 15,744.18
		Required amount of stable funding	BDT 14,303.66

j) Leverage Ratio:

Qualitative disclosures	a)	**Views of BOD on system to reduce excessive leverage** In order to avoid building-up excessive on- and off-balance sheet leverage in the banking system, a simple, transparent, non-risk based leverage ratio has been introduced. The leverage ratio is calibrated to act as a credible supplementary measure to the risk based capital requirements. The leverage ratio is intended to achieve the following objectives: a) constrain the build-up of leverage in the banking sector which can damage the broader financial system and the economy; and b) reinforce the risk based requirements with an easy to understand and a non-risk based measure. **Policies and processes for managing excessive on and off balance sheet leverage** Introducing the leverage ratio as an additional prudential tool has several potential benefits. The financial crisis has illustrated the disruptive effects of procyclicality (amplification of the effects of the business cycle) and of the risk that can build up when financial firms acting in an individually prudent manner collectively creates systemic problems. There is now broad consensus that micro-prudential regulation needs to be complemented by macro-prudential regulation that smoothens the effects of the credit cycle. This has led to proposals for countercyclical capital requirements and loan loss provisions that would be higher in good times and lower in bad times.

		Approach for calculating exposure The leverage ratio should be calculated by dividing an institution's capital measure by the total exposure (expressed as a percentage). The ratio should be calculated as the simple arithmetic mean of the monthly leverage ratios over a quarter. For the numerator of the ratio (capital measure), the Tier 1 capital should be considered. The denominator (exposure measure) should be the sum of the exposure values of all assets and off-balance sheet items not deducted from the calculation of Tier 1 capital. **Leverage Ratio = Tier 1 Capital (after related deductions)/ Total Exposure (after related deductions)** A minimum Tier 1 leverage ratio of 3% is being prescribed both at solo and consolidated level. The banks is maintaining leverage ratio on quarterly basis. The calculation at the end of each calendar quarter is submitted to BB showing the average of the month end leverage ratios based on the following definition of capital and total exposure.

Quantitative disclosures

	Solo	Consolidated
Leverage ratio	4.71%	4.66%
On balance sheet exposure	19,349.34	19,487.70
Off balance sheet exposure	2,738.96	2,738.96
Total exposure	21,693.32	21,774.27

k) Remuneration

The following are the main disclosure on remuneration that bank includes in their pillar-3 documents. Bank is strongly encouraged not only to disclose the required information, but to articulate as far as possible how these factors complement and support their overall risk management framework.

This requested quantitative disclosures detailed below should only cover senior management and other material takers and be broken down between these two categories.

Qualitative Disclosures		
(a)	Information relating to the bodies that oversee remuneration	The Management of Standard Bank Limited for Remuneration program holds the responsibilities for overseeing the framing, reviewing and implementing of overall compensation structure and related polices over remuneration package issues payable to all or specialized employees and the Directors/MD/any other appointed/engaged person(s)/Material Risk Takers of the Bank. They also oversee performance oriented incentives, perquisites, other financial options etc. to attract, motivate and retain employees and review compensation packages/pay structure in comparison to that of other Banks to enjoy competitive advantages in this industry. In addition, the Management of SBL also carries out the following roles and responsibilities: • Review of the Compensation Policy annually or as demanded by market. • Exercise such other powers and play the roles delegated to it by the Board. • Till present, the Bank has not yet engaged any External Consultants for conducting such exercise since these have been done by the Bank's Management.

(b)	Information relating to the remuneration of the processes	All applicable substantive pay and other allowances including perquisites to the employees including all subordinates, officers and executives up to the rank of SEVP are designed well accord with the prevailing competitive remuneration structure in the industry. The package structure of all executives above the rank of SEVP i.e. DMD, AMD & MD, the individual remuneration is fixed and approved by the Board of Directors. All the Pay Structure and perquisites payable to the employees get approved by the Board of Directors of the Bank. In order to format and design the remuneration package, the Management and the Board take into the following consideration: 1. Minimum Qualification level set during the recruitment 2. level of Experience 3. Level of Risk involved 4. Complexities of the job 5. degree of creativity or productivity expected in the job 6. Business developing excellence and expertise 7. Leadership capability 8. Corporate exposure However the remuneration structure/package for the Managing Director (MD) of the Bank is subject to approval of Bangladesh Bank.
(c)	Description of the ways in which current and future risks are taken into account in the remuneration processes	The Management has always been in practice of reviewing remuneration/compensation package/structure of the prime employees in top positions who are associated with high degree of risk factors, current and future position. The Board of Directors oversees and governs effective framing and implementation of the remuneration policy. Human Resource Management under the guidance of MD administers the compensation and Benefit structure in line with the best suited practices and statutory requirements as applicable.
(d)	Description of the ways in which the banks seeks to link performances during a performance measurement period with levels of remuneration	On the way to link performances during a performance measurement period with levels of remuneration management takes the feedback or appraisal from head of branch (in case of branch officials) or concerned Head of Division (for Head Office) in the form of Annual Performance Appraisal (APA), previously known as Annual Confidential Report (ACR). Although all employees receive the festival bonuses irrespective of performance, yearly incentive is determined and awarded on basis of the Annual Performance Appraisal (APA). In case of hiring exceptionally deserving candidate bank offers enhanced package program with seniority in rank.
(e)	Description of the ways in which the banks seeks to adjust remuneration to take account of longer-term	The Bank follows various schemes in regards to deferred and vested variable remuneration as follows: - PF (Vesting or entitlement to employer's contribution
(f)	Description of the different forms of variable remuneration that the bank utilizes and the rationale for using these forms	Variable pay refers to the compensation as fixed by the Board on recommendation of the Management, which is based on the performance appraisal of an employee in that role, that is, how well they accomplish their goals. It may be paid as: ✓ Performance Linked Incentives to those employees who are eligible for incentives. ✓ Ex-gratia for other employees who are not eligible for

		✓ Performance linked Incentives. ✓ Different awards based on extra-ordinary performance & achievement. ✓ Employee/Manager of the Month/Quarter award ✓ Reimbursement/award for brilliant academic/professional achievement. ✓ Leave Fare Compensation (LFC)
Quantitative Disclosures		
(g)	Number of meetings held by the main body overseeing remuneration during the financial year and remuneration paid to its member	Number of meetings held by the main body overseeing remuneration during the financial year: ---------------------- Remuneration paid to member: Nil
(h)	Number of employees having received a variable remuneration award during the financial year	Number of employees having received a variable remuneration award during the financial year: 2,386 Number and total amount of guaranteed bonuses award during the financial year: 02, BDT L13.36 crore Number and amount of sign-on awards made during the year: 00
(i)	Total amount of outstanding deferred remuneration, split into cash, shares, and share-linked instruments and other forms	Total amount of outstanding deferred remuneration, split into cash, shares, and share-linked instruments and other forms: BDT 183.12 crore Total amount of deferred remuneration paid out in the financial year: BDT 8.11 crore
(j)	Breakdown of amount of remuneration awards for the financial year to show:	Breakdown of amount of remuneration awards for the financial year to show: -fixed remuneration : BDT 149.57 crore variable remuneration: BDT 3.70 crore -deferred remuneration: BDT 183.12 crore and non-deferred remuneration: BDT 153.27 crore -different forms used (cash, shares and share-linked instruments, other forms): All the remunerations are provided in the form of cash.
(k)	Quantitative information about employees' exposure to implicit (e.g. fluctuation in the value of shares or performance units) and explicit adjustments (eg claw back or similar reversals or downward revaluations of awards)of deferred remuneration and retained remuneration:	Quantitative information about employees' exposure to implicit (e.g. fluctuation in the value of shares or performance units) and explicit adjustments (eg claw back or similar reversals or downward revaluations of awards)of deferred remuneration and retained remuneration: Total amount of outstanding deferred remuneration and retained remuneration exposed to ex post explicit and/or implicit adjustments: Nil Total amount of reductions during the financial year due to ex post explicit adjustments: Nil Total amount of reductions during the financial year due to ex post Implicit adjustments: Nil