

MARKET DISCLOSURE

PILLAR III OF BASEL III

Disclosures on Risk Based Capital (Basel III) For the Year Ended December 31, 2021

1. Introduction

The public disclosure of prudential information is an important component of Basel Committee on Banking Supervision's framework of capital measurement and capital adequacy, known as Basel III. In response to the global financial crisis 2008, Basel Committee for Banking Supervision (BCBS) came up with a new set of capital and liquidity standards in the name of Basel III in 2010. To cope up with the international best practices and to make the bank's capital shock absorbent Bangladesh Bank (BB) issued Guidelines on Risk Based capital adequacy (*a revised regulatory capital framework for banks in line with Basel III*) in December 2014. Bangladesh Bank has specified the standard of disclosure through Guidelines on Risk Based Capital Adequacy (December 2010) which revised in Basel III Guideline on December 2014 with effect from January 2015

The objectives of the market discipline process in the revised framework are to establish more transparent and more disciplined financial market analysis, so that stakeholders can assess the position of the bank regarding holding of asset and capital adequacy to meet any probable loss of assets. In compliance with BRPD circular no. 18 dated December 21, 2014 on 'Guidelines on Risk Based Capital Adequacy' following detailed quantitative and qualitative disclosures are provided covering scope of capital adequacy framework, risk exposure and assessment methodologies, risk management and mitigation strategies, and capital adequacy of the bank, etc.

2. Disclosure Policy

These disclosures provide information to market participants for assessing the status of the bank's exposure to various risks and provide a consistent and understandable disclosure framework for easy comparison among banks operating in the same market. The report is prepared once a year and is available in the banks website a(<https://www.nrbcommercialbank.com>).

3. Components of Disclosure Framework

As defined and by the BASEL III guidelines, information on the following ratios and factors are required to be calculated, assembled and provided:

i) Scope of application ii) Capital structure iii) Capital adequacy iv) Credit risk v) Equities disclosures for banking book positions vi) Interest Rate Risk in the Banking Book (IRRBB) vii) Market risk viii) Operational risk ix) Leverage ratio x) Liquidity ratio xi) Remuneration.

i) Scope of application

NRB Commercial Bank Ltd. (NRBCB) applies capital adequacy framework for both solo and consolidated basis. The Bank has one subsidiary company named NRB Commercial Securities Limited (NRBCSL), Bangladesh Bank had given permission for operating the subsidiary in 2015.

'Solo Basis' refers to all position of the NRB Commercial Bank Ltd. Including its local and overseas branches and Off Shore Banking unit.

'Consolidated Basis' refers to all position of the NRB Commercial bank (including its local and overseas branches) and its subsidiary company NRBCSL.

ii) Capital structure

Qualitative disclosure

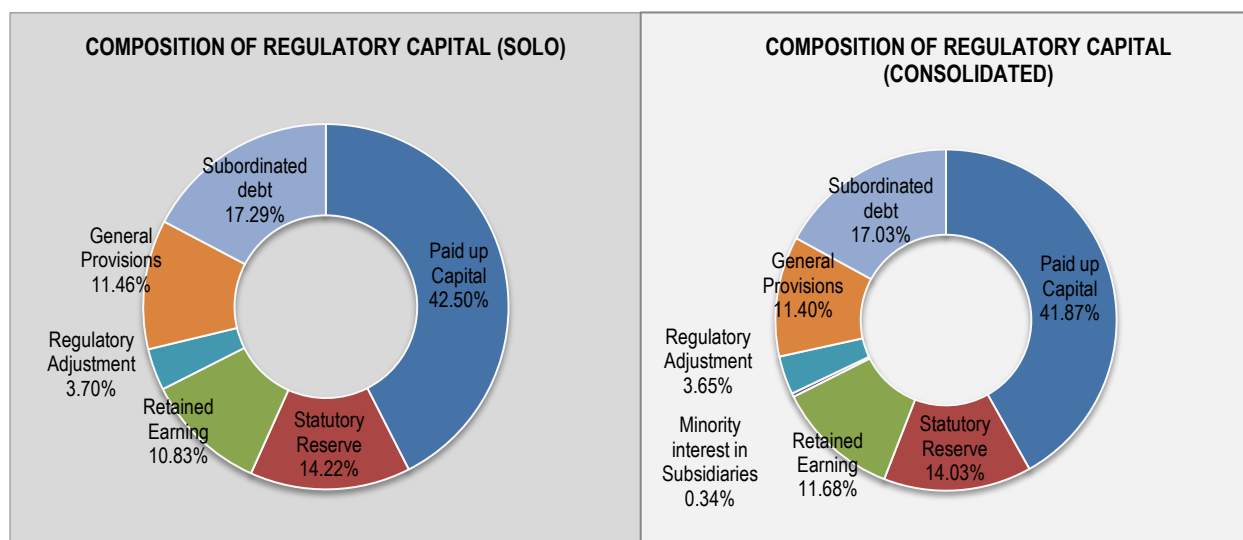
The composition of a bank's regulatory capital is different from a bank's accounting capital. The terms and conditions of the main features of capital instruments, especially, eligibility for inclusion in Common Equity Tier-1 (CET1), Additional Tier-1 and Tier-2 have been prepared based on the 'Guidelines on Risk Based Capital Adequacy' and other instruction given by Bangladesh Bank.

Tier-1 capital of NRBCB consists of Common Equity Tier-1 and Additional Tier-1 capital. Tier-1 capital is also known as going concern capital as it allows a bank to continue its ongoing activities. Common Equity Tier 1 (CET1) capital of NRBCB consists of paid up Capital, Statutory reserve, General reserve, Retained earnings and Minority interest in subsidiaries after netting regulatory adjustments applicable on CET1 as mentioned in RBCA guideline.

Tier-2 capital is also known as Gone-Concern Capital, is the Capital which will absorb losses only in a situation of liquidation of the bank. Tier-2 capital of NRBCB comprised of General Provisions, Subordinated Debt and revaluation reserve.

Quantitative disclosure

PARTICULARS	BDT CRORE	
	SOLO	CONSOLIDATED
COMMON EQUITY TIER-1 :		
PAID UP CAPITAL	737.64	737.64
STATUTORY RESERVE	246.72	247.10
RETAINED EARNING	187.94	205.68
MINORITY INTEREST IN SUBSIDIARIES	0.00	6.01
REGULATORY ADJUSTMENTS :		
DEFERRED TAX ASSETS (DTA)	64.26	64.26
TOTAL COMMON EQUITY TIER-1	1108.04	1132.17
ADDITIONAL TIER-1 :		
TOTAL TIER-1 CAPITAL	1108.04	1132.17
TIER-2 CAPITAL :		
GENERAL PROVISIONS	198.89	200.87
SUBORDINATED DEBT	300.00	300.00
REGULATORY ADJUSTMENTS :		
TOTAL TIER-2 CAPITAL	498.89	500.87
TOTAL REGULATORY CAPITAL	1606.93	1633.04



iii) Capital adequacy

Qualitative disclosure

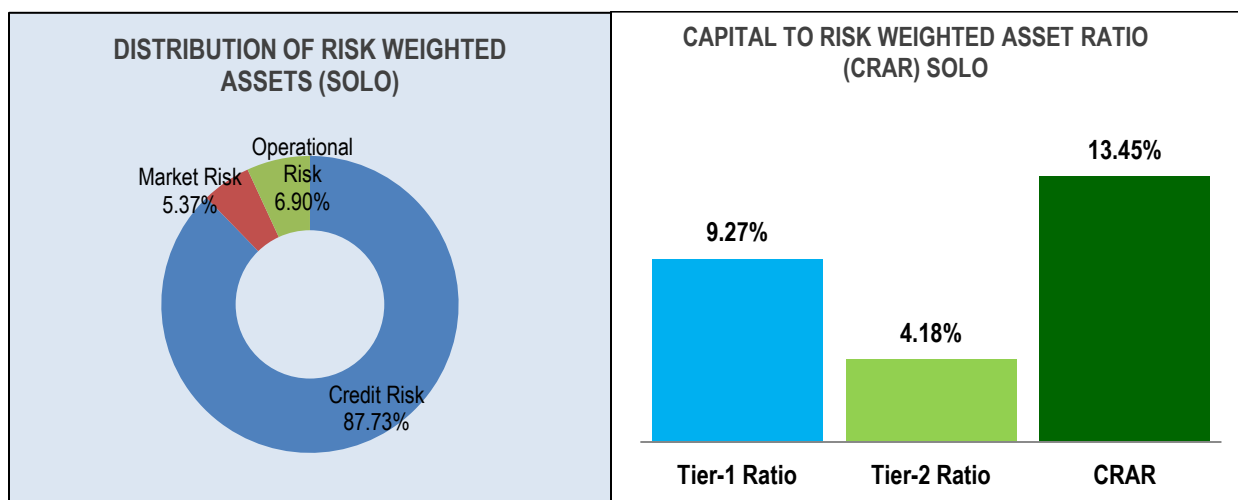
NRBC Bank focuses on strengthening the risk management and control environment over increasing capital annually, as part of this may arise from any inefficient risk management, control and compliance processes and procedures, which, if applied properly, may reduce the need for additional equity by yielding better risk indicators and lower capital requirement. The Bank effectively manages its capital to meet the regulatory requirement for capital arising from its annual business growth and the required risk profile needed to generate the growth.

The Bank follows following approaches for calculating Risk Weighted Asset (RWA) as per Basel-III guidelines stated in BRPD Circular No.18 dated December 21, 2014 of Bangladesh Bank:

- ⊙ Standardized approach for Credit risk
- ⊙ Standardized approach for Market risk
- ⊙ Basic indicator approach for Operational risk

Quantitative disclosure

PARTICULARS	BDT CRORE	
	SOLO	CONSOLIDATE
CAPITAL REQUIREMENT FOR CREDIT RISK	1047.73	1053.70
CAPITAL REQUIREMENT FOR MARKET RISK	64.38	66.06
CAPITAL REQUIREMENT FOR OPERATIONAL RISK	82.68	83.43
TOTAL CAPITAL REQUIREMENT	1194.83	1203.19
TOTAL ELIGIBLE CAPITAL	1606.93	1633.04
CAPITAL TO RISK WEIGHTED ASSET RATIO (CRAR)(%)	13.45	13.57
COMMON EQUITY TIER-1 CAPITAL RATIO (%)	9.27	9.41
TOTAL TIER-1 CAPITAL RATIO (%)	9.27	9.41
TOTAL TIER-2 CAPITAL RATIO (%)	4.18	4.16
CAPITAL CONSERVATION BUFFER (2.5% OF RWA)	3.27%	3.41%
AVAILABLE CAPITAL FOR PILLAR II REQUIREMENT	412.10	429.85



The Bank has fully complied with all the required conditions for maintaining regulatory capital as stipulated in the revised RBCA guidelines by Bangladesh Bank

Banks' Capital Position

In line with the business growth and the subsequent risk profile of the bank, the bank management effectively manages its capital to ensure full compliance with all the regulatory requirements. Some of the regulatory requirements regarding Capital management are given:

- ✓ Currently the Bangladesh Bank prescribed Minimum Capital Adequacy Ratio (MCR) is 10%, whereas as on December 2021 the CRAR of the bank was 13.45%.
- ✓ During the same period Minimum Capital Requirement (MCR) of the bank was BDT 1194.83 crore (solo basis) and eligible capital was BDT 1606.93 crore; i.e. the bank held BDT 412.10 crore surplus capital.

Reduction of Capital Requirement through increasing the number of Rated Clients:

As per Basel-III norms capital adequacy i.e. maintaining buffer capital is compulsory for banks to absorb any possible financial loss arising from the financial activities and unexpected market conditions. Under the Standardized Approach of the RBCA guidelines of Basel-III, counterparties credit rating are determined on the basis of risk profile assessed by the External Credit Assessment Institutions (ECAIs) duly recognized by Bangladesh Bank to derive risk-weights of exposures under the portfolio of claims. According to the guideline, the rated exposures of a bank will reduce the Risk Weights and the regulatory capital requirement as well as create the room to expand the business of the bank. This will also enable the bank to assess the creditworthiness of the borrowers as well, to an acceptable level.

The Board of Directors & the Senior Management, agreed with the decisions taken in the BRMC, ERM and SRP Committee on achieving the highest possible rated exposure in 2021 as would lower our risk profile as well as reduce the capital requirement of the bank. Accordingly, the Risk Management Division (RMD), CRMD, SAMD and CAD along with the CRO along and the branch managers made an all-out effort to increase the number of rated corporate borrowers and SME borrowers throughout 2021. The respective divisions and branches constantly took initiatives through guidance of the Senior Management; which were then disclosed and discussed in a series of meetings, correspondence, and awareness programs with the allied concerns i.e. branches of the bank & ECAIs. As a result of strong persuasion & motivation, the number of rated clients increased in the year 2021 from 2020.

iv) Credit risk

Credit risk is defined as the probability of failure of counterparty to meet its obligation as per agreed terms and conditions. Banks are very much prone to credit risk due to its core activities i.e. lending to corporate, commercial, SME, retail, another bank/FI or to another country. The main objective of credit risk management is to minimize the negative impact through adopting proper mitigates and also limiting credit risk exposures within acceptable limit.

The Board approved the credit policy in accordance with relevant Bangladesh Bank guidelines to ensure best in practice in credit risk management and maintain quality of assets. Proper delegation of authority ensures effective 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 warning system. There is a separate Credit Risk Management Division for ensuring proper risk management of Loans and Credit Administration Division for monitoring and recovery of irregular loans. Adequate provision is maintained against classified loans as per Bangladesh Bank guidelines. Statuses of loans are regularly reported to the Board through Risk Management Paper.

The Capital requirement for credit risk is based on the risk assessment made by External Credit Assessment Institutions (ECAIs) recognized by Bangladesh Bank for capital adequacy purposes. The Bank assigned risk weights to all their on-balance sheet and off-balance sheet exposures. Risk weights are based on external credit rating which mapped with the Bangladesh Bank rating grade or a fixed weight that is specified by Bangladesh Bank.

Credit Risk Management Processes in NRBC Bank encompasses with the following steps:

Credit Risk Identification

- ✓ Critical analysis and review of delinquent accounts to identify weakness in credit.
- ✓ Credit risk for the counterparty arises from an aggregation of the following: Financial Risk, Business/Industry Risk, Security Risk, Management Risk

Credit Risk Assessment and Measurement

- ✓ Use of credit risk rating system to grade the quality of borrowers. Collection the Credit Information Bureau (CIB) report of the potential borrower from the Central Bank.
- ✓ Stress Testing of loan portfolios under various scenarios. Ensuring Credit Rating of the Customer from External Credit Rating Agencies.

Credit Risk Control

- ✓ Credit Policy which documents the credit risk rating collateral policy and policies on rehabilitation and restructuring of problematic and delinquent loans.
- ✓ Efficient credit personnel to deal with the credit approval, processing and review.

Credit Risk Monitoring

- ✓ CRMD and SAMD monitor the Credit Risk, and advise the top management and implement their directives.
- ✓ Past due principal or interest payment, past due trade bills, account excesses and breach of loan covenants.
- ✓ All loan facilities are reviewed and approved through the submission of a Credit Application annually.

Policies and processes for collateral Valuation and Management

The NRBC bank has set a policy on Collateral Valuation and Management. The bank appoints approved surveyors for valuation of collateral/securities objectively. The valuation methodology that Bank usually applies are forced

sale/fire sale value, fair/market value etc. The Bank creates Legal claims on collateral/securities through mortgage, lien, Assignments, hypothecation and other legal documentation etc.

Eligible Collateral:

As per Bangladesh bank guidelines following items will be included as eligible collateral in determining base for provision:

- ✓ 100% of deposit under lien against the loan
- ✓ 100% of the value of government bond/savings certificate under lien
- ✓ 100% of the value of guarantee given by Government or Bangladesh Bank
- ✓ 100% of the market value of gold or gold ornaments pledged with the bank.
- ✓ 50% of the market value of easily marketable commodities kept under control of the bank
- ✓ Maximum 50% of the market value of land and building mortgaged with the bank
- ✓ 50% of the average market value for last 06 months or 50% of the face value, whichever is less, of the shares traded in stock exchange.

Impaired Credit:

To define past due and impairment for classification and provisioning, the bank follows Bangladesh Bank Circulars and Guidelines. The summary of some objective criteria for loan classification and provisioning requirement as stipulated by the central bank, BRPD circular no. 14 dated 23 September 2012, BRPD circular no 8 dated 2 August 2015, BRPD circular no 12 dated 20 August 2017, BRPD circular no 15 dated 27 September 2017, BRPD circular letter no 1 dated 03 January 2018 and BRPD circular no 01 dated 20 February 2018, BRPD circular no 07 dated 21 June 2018, BRPD circular no 13 dated 18 October 2018 and BRPD Circular no. 03 dated 21 April 2019, BRPD Circular no. 04 dated 19 March 2020, BRPD Circular no. 07 dated 19 March 2020, BRPD Circular no. 16 dated 21 July 2020, BRPD Circular no. 17 dated 28 September 2020, BRPD Circular no. 52 dated 20 October 2020, BRPD Circular no. 56 dated 10 December 2020, BRPD Circular no. 59 dated 30 December 2020, BRPD Circular no. 63 dated 31 December 2020, BRPD Circular no. 03 dated 31 January 2021, BRPD Circular no. 05 dated 24 March 2021, BRPD Circular no. 13 dated 27 June 2021, BRPD Circular no. 19 dated 26 August 2021, BRPD Circular no. 50 dated 14 December 2021, BRPD Circular no. 51 dated 29 December 2021, BRPD Circular no. 52 dated 29 December 2021, BRPD Circular no. 53 dated 30 December 2021. The summary of some objective criteria for loan classification and provisioning requirement is as below

LOANS CLASSIFICATION

TYPE OF FACILITY	Substandard	Doubtful	Bad & Loss
	Overdue Period	Overdue Period	Overdue Period
CONTINUOUS LOAN AND DEMAND LOAN	3 months or more but less than 9 months	9 months or more but less than 12 months	12 months or more
FIXED TERM LOAN (*)	3 or more but less than 9 equal monthly installment	9 or more but less than 12 equal monthly installment	12 or more equal monthly installment
SHORT TERM AGRICULTURAL & MICRO CREDIT	12 months or more but less than 36 months	36 months or more but less than 60 months	60 months or more
COTTAGE, MICRO AND SMALL CREDIT			

CONTINUOUS LOAN AND DEMAND LOAN	6 months or more but less than 18 months	18 months or more but less than 30 months	30 months or more
FIXED TERM LOAN (*)	6 or more but less than 18 equal monthly installment	18 or more but less than 30 equal monthly installment	30 or more equal monthly installment

GENERAL PROVISION ON:

UNCLASSIFIED SMALL AND MEDIUM ENTERPRISE	0.25%
UNCLASSIFIED LOANS FOR HOUSING FINANCE AND UNCLASSIFIED SHORT TERM AGRI. CREDIT AND MICRO CREDIT LOANS TO BHS/MBS/SDS AGAINST SHARES ETC.	1%
UNCLASSIFIED CONSUMER FINANCING OTHER THAN HOUSING FINANCE AND UNCLASSIFIED CREDIT CARD OFF BALANCE SHEET EXPOSURES	2%
SPECIFIC PROVISION ON:	2%
SUBSTANDARD SMALL, COTTAGE & MICRO CREDIT	1%
SUBSTANDARD & DOUBTFUL SHORT TERM AGRI. CREDIT AND MICRO CREDIT	5%
SUBSTANDARD LOANS AND ADVANCES OTHER THAN SHORT TERM AGRI. CREDIT AND MICRO CREDIT	5%
DOUBTFUL SMALL, COTTAGE & MICRO CREDIT	20%
DOUBTFUL LOANS AND ADVANCES OTHER THAN SHORT TERM AGRI. CREDIT AND MICRO CREDIT	20%
	50%

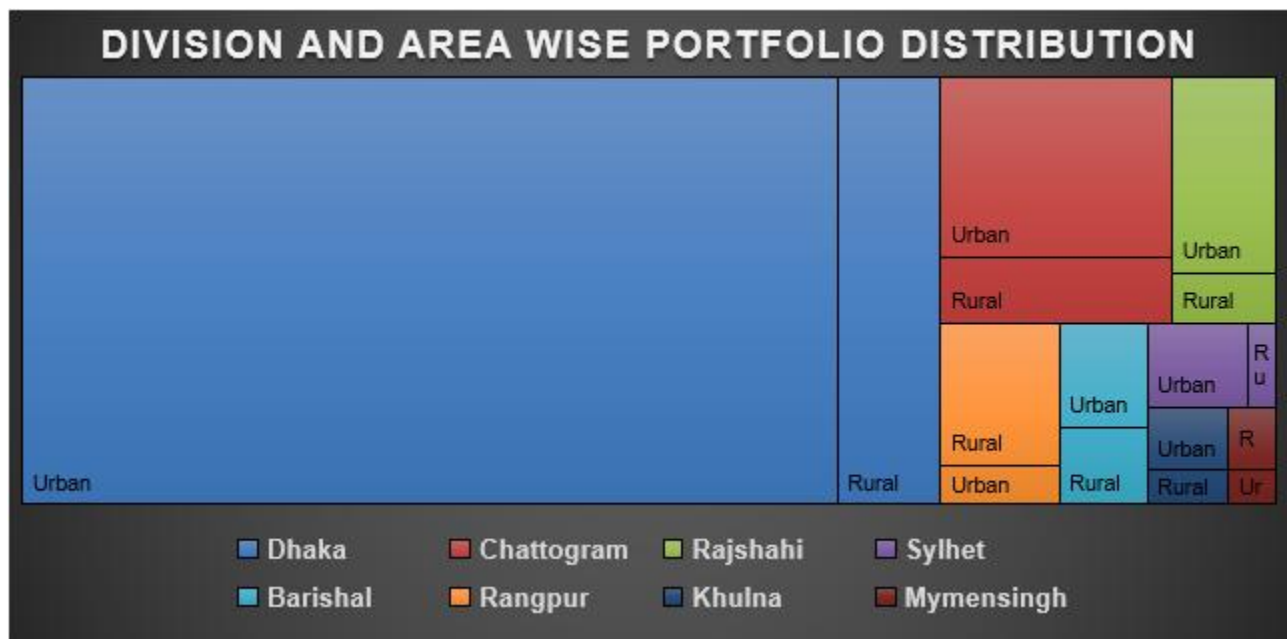
**In case of any installment(s) or part of installment(s) of a Fixed Term Loan is not repaid within the fixed expiry date, the amount of unpaid installment(s) is treated as past due/overdue after six months of the expiry date.*

Specific Provision for classified loans and general provisions for unclassified loans and advances and contingent assets are measured following BB prescribed provision rates

Quantitative Disclosures of NRBC Bank's Credit Risk:

Geographical distribution of exposures, broken down in significant areas by major types of credit exposure:

URBAN	BDT CRORE
DHAKA	6820.71
CHATTOGRAM	819.29
RAJSHAHI	396.91
SYLHET	164.13
BARISHAL	179.18
RANGPUR	91.09
KHULNA	101.19
MYMENSINGH	31.90
RURAL	
DHAKA	867.75
CHATTOGRAM	296.99
RAJSHAHI	101.45
SYLHET	46.95
BARISHAL	132.71
RANGPUR	327.81
KHULNA	54.49
MYMENSINGH	57.27
TOTAL	10489.83



Total gross credit risk exposures broken down by major types of credit exposure:

PARTICULARS	BDT CRORE
OVERDRAFT	2028.54
CASH CREDIT	891.95
TIME LOAN	751.27
TERM LOAN	2790.16
PAYMENT AGAINST DOCUMENT	8.68
LOANS AGAINST TRUST RECEIPT	245.04
PACKING CREDIT	44.24
EDF LOAN	34.18
SME CREDIT	1301.46
LEASE FINANCE	91.99
HIRE PURCHASE (CONVENTIONAL & ISLAMIC)	286.16
RETAILS CREDIT	663.74
STAFF LOAN	94.77
CREDIT CARD	69.88
OTHER LOANS AND ADVANCES	1187.76
TOTAL	10489.83

Industry or counterparty type distribution of exposures, broken down by major types of credit exposures:

INDUSTRIES	BDT CRORE
AGRICULTURAL INDUSTRY	161.58
TEXTILE	329.94
RMG	1089.97
NBFI	87.28
FOOD	55.77
BEVERAGE	58.42
PHARMACEUTICAL	10.51
CHEMICAL	0.00
ELECTRICAL	149.94
CONSTRUCTION	545.02
HOUSE BUILDING RESIDENTIAL	496.59
LEATHER	66.66
SERVICE INDUSTRY	652.51
TRANSPORT	28.04
BASIC METAL	0.00
CAPITAL MARKET	140.87
CAR LOAN	0.00
FURNITURE	109.47
INSURANCE	14.82

CONSUMER FINANCE	661.38
PRINTING	138.88
SHIP BREAKING	167.01
SME	3378.50
STAFF LOAN	76.18
STEEL	263.87
TRADE INDUSTRY	933.73
CARD	69.88
OTHER MANUFACTURING INDUSTRY	733.09
OTHERS	69.91
TOTAL	10489.83

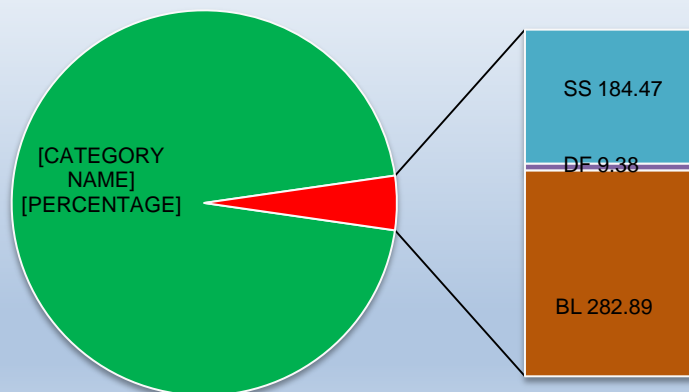
Residual contractual maturity breakdown of the whole portfolio, broken down by major types of credit exposure:

MATURITY	BDT CRORE
PAYABLE ON DEMAND	945.82
NOT MORE THAN 3 MONTHS	2,142.26
MORE THAN 3 MONTHS BUT NOT MORE THAN 1 YEAR	2,772.87
MORE THAN 1 YEAR BUT NOT MORE THAN 5 YEARS	2,139.61
MORE THAN 5 YEARS	2,489.26
TOTAL	10,489.83

Gross Non-Performing Asset:

UNCLASSIFIED	BDT CRORE
STANDARD INCLUDING STAFF LOAN	9,670.95
SPECIAL MENTION ACCOUNT	342.14
SUB-TOTAL (A)	10,013.09
CLASSIFIED	
SUBSTANDARD LOAN	184.47
DOUBTFUL	9.37
BAD/LOSS	282.89
SUB-TOTAL (B)	476.73
TOTAL (A+B)	10489.83

Distribution of Loan Portfolio based on Classification



Movement of Nonperforming Asset (NPAs) and specific provisions of NRBC Bank:

MOVEMENT OF NONPERFORMING ASSET (NPAS)	BDTCRORE
GROSS NON PERFORMING ASSETS(NPAS)	476.73
MOVEMENT OF NPAS	
OPENING BALANCE	219.11
ADDITION	257.62
REDUCTION	0.00
CLOSING BALANCE	476.73
MOVEMENT OF SPECIFIC PROVISIONS FOR NPAS	
OPENING BALANCE	110.22
PROVISIONS MADE DURING THE PERIOD	70.17
WRITE-OFF	
WRITE-BACK OF EXCESS PROVISIONS	
CLOSING BALANCE	180.39

v. Equities: Disclosures for banking book positions:

Investment in equity securities by NRBC Bank is broadly categorized into two parts: Quoted securities (Ordinary shares, Mutual Fund) and Un-quoted securities (including preference share and subscription for private placement). Unquoted securities are categorized as banking book exposures which are further subdivided into two groups: unquoted securities which are invested without any expectation that these will be quoted in near future (i.e. held to maturity) and securities that are acquired under private placement or IPO and are going to be traded in the secondary market after completing required formalities. Usually these securities are held for trading or investment for making capital gains.

PARTICULARS (SOLO BASIS)	COST PRICE	MARKET PRICE	UNREALIZED GAIN/LOSS
QUOTED SHARE	227.52	210.56	(16.96)

All investment securities are initially recognized at cost. Premiums are amortized and discount accredited, using the effective yield method and are taken to discount income. The valuation methods of Marking to Market for investment used are

- a) Held to Maturity (HTM) and by definition the investments which have "Fixed or determinable" payments and fixed maturity that the group has the positive intent and ability to hold to maturity other than those that meet the definition of 'Held at amortized cost others' are classified as held to maturity. These investments are subsequently measured at amortized cost, less any provision for impairment in value. Amortized cost is calculated by taking into account any discount or premium in acquisition. Any gain or loss on such investments is recognized in the statement of income when the investment is derecognized or impaired as per IAS-39 "Financial Instruments: Recognition and Measurement"
- b) Held for Trading (HFT) is a method where investments are acquired principally for the purpose of selling or repurchasing or in short trading or if designated as such by the management. After initial recognition, investments are measured at present value and any change in the fair value is recognized in the statement of income for the period in which it arises. Transaction costs, if any, are not added to the value of investments at initial recognition.
- c) Revaluation: According to DOS Circular no.-05, dated 26th May 2008, the HFT securities are revalued once each week using Marking to Market concept and the HTM securities are amortized once a year according to Bangladesh Bank guidelines. The HTM securities are also revalued if they are reclassified to HFT category with the Board's approval.

Capital Charge on Equities:

PARTICULARS	AMOUNT	CAPITAL CHARGE
SPECIFIC RISK	210.56	21.06
GENERAL MARKET RISK	210.56	21.06
TOTAL	421.12	42.12

vi. Interest Rate Risk in the Banking Book (IRRBB):

It is the risk related to interest income arising from a mismatch between the duration of assets and liabilities that arises in the normal course of business activities. Changes in interest rates affect the underlying value of the bank's assets, liabilities, and off-balance-sheet (OBS) instruments because the present value of future cash flows (and in some cases, the cash flows themselves) changes when interest rates change.

Organizational Structure: The Asset Liability Management Committee of the Bank monitors and manages the IRRBB. The ALCO is responsible for management of the balance sheet of the Bank with a view to manage the market risk exposure by the Bank within the risk parameters laid down by the Board of Directors/Risk Committee.

IRRBB Management procedure:

IRRBB architecture is the framework to measure, monitor and control the adverse impact of interest rates on the Bank's financial condition within tolerable limits. This impact is calculated from following perspectives:

- i) Earning perspective: Indicates the impact on Bank's net interest income (NII) in the short term.
- ii) Economic perspective: Indicates the impact on the net-worth of bank due to re-pricing of assets, liabilities and off-balance sheet items.

The ALM& Market Risk Policies define the framework for managing IRRBB through measures such as:

- a) **Interest Rate Sensitivity Report:** Measures mismatches between rate sensitive liabilities and rate sensitive assets in various tenor buckets based on re-pricing or maturity, as applicable.
- b) **Duration Gap Analysis:** Measures the mismatch in duration of assets & liabilities and the resultant impact on market value of equity.
- c) **Stress Testing:** It is conducted on quarterly basis as per the directives of Bangladesh Bank to gain better insight into the vulnerable issue of IRRBB. Evaluates the impact on duration of capital of banking book under various stress scenarios.

Quantitative Disclosure:

PARTICULARS	IN YEARS
DURATION IN ASSET	2.10
DURATION IN LIABILITIES	1.23
DURATION GAP (IN YEARS)	0.92

Interest rate risk in banking book as of Dec 31st, 2021 is calculated as change in Market Value (MV) of equity as below:

INTEREST RATE CHANGE	1%	2%	3%
CHANGE IN MARKET VALUE OF EQUITY	(125.20)	(250.40)	(375.61)

The below result implies that bank has more interest rate sensitive assets than interest rate sensitive liabilities and increase in interest rate may cause a increase in the economic value of bank's capital.

Sensitivity Analysis:

	BDT CRORE
TOTAL RISK SENSITIVE ASSET	6209.36
TOTAL RISK SENSITIVE LIABILITIES	8173.54
CUMULATIVE GAP	
< 3 MONTHS	(868.18)
< 6 MONTHS	(627.04)
< 12 MONTHS	(468.96)
CRAR BEFORE SHOCK (SOLO)	13.45%

ASSUMED CHANGE IN INTEREST RATE	1%	2%	3%
CAPITAL AFTER SHOCK	1481.73	1356.53	1231.32
CRAR AFTER SHOCK	12.53%	11.60%	10.64%

vii. Market Risk:

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:

- ✓ Interest rate risk
- ✓ Foreign exchange risk
- ✓ Equity position and
- ✓ Commodity risk.

Among the above list the main type of market risk faced by the Bank are interest rate risk and foreign exchange risk. The management of Bank 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.

Views of Board of Directors (BoD) on trading/investment activities:

The Board approves all policies related to market risk, sets limits and reviews compliance on a regular basis. The objective is to obtain maximum returns without taking undue risks.

Methods used to measure Market Risk:

Bank applies maturity method in measuring interest rate risk in respect of securities in trading book. The capital charge for entire market risk exposure is computed under the standardized approach using the maturity method and in accordance with the guideline issued by Bangladesh Bank.

Market Risk Management System:

The Treasury Division manage market risk covering liquidity, interest rate and foreign exchange risks with oversight from Asset-Liability Management Committee (ALCO) comprising senior executives of the Bank.

Policies and procedure for mitigating market risk are mentioned below:

- ✓ Risk Management and reporting is based on parameters such as Maturity Gap Analysis, Duration Gap Analysis.
- ✓ Risk Profiles are analyzed and mitigating strategies/processes are suggested by the Asset Liability Committee (ALCO). Treasury is in charge of implementing the day by day strategy.
- ✓ Foreign Exchange Net Open Position (NOP) limits (Day limit/Overnight limit), deal-wise trigger limits, Stop-loss limit, Profit/Loss in respect of cross currency trading are properly monitored and exception reporting is regularly carried out.
- ✓ Holding of equities is monitored regularly so that the investment remains within the limit as set by Bangladesh Bank.
- ✓ Asset Liability Management Committee (ALCO) analyzes market and determines strategies to attain business goals.
- ✓ Reconciliation of foreign currency transactions.

Qualitative Disclosure

THE CAPITAL REQUIREMENTS FOR	BDT Crore	
	SOLO	CONSOLIDATED
INTEREST RATE RISK	10.47	10.47
EQUITY POSITION RISK	42.11	43.79
FOREIGN EXCHANGE RISK	11.80	11.80
COMMODITY RISK	0.00	0.00

viii. Operational Risk:

Operational risk is the risk of direct or indirect loss due to an event or action resulting from the failure of internal processes, people and systems, or from external events. We seek to minimize exposure to operational risk, subject to cost benefit trade-offs.

Views of BoD on system to reduce operational risk:

Banks Internal Control & Compliance (ICCD) is the main tool in managing operational risk. Management through three units of ICCD i.e. monitoring, compliance and Audit & Inspection controls overall operation of the bank. Board audit committee directly oversees the functions of ICCD to prevent operational risk.

Performance gap of executives and staffs:

NRBC Bank is an equal opportunity employer. RBC Bank recognize the importance of having the right people at right positions to achieve organizational goals. Our recruitment and selection is governed by the philosophies of fairness, transparency and diversity. Understanding what is working well and what requires further support is essential to our performance management system. The performance management process aims to clarify what is expected from employees as well as how it is to be achieved.

Potential external Event:

No potential external event is expected to expose the Bank to significant operational risk.

Policies and processes for mitigating operational risk:

As there is no upside of this risk, the objective of the management of operational risk is to minimize the risk in cost effective manner. Currently bank is not using any model or tool to capture operational loss data for historical analysis rather it is a self-assessment process. Bank's ICC Division is responsible for risk identification, measurement, monitoring, control, and reporting of operational risk. Bank strongly follows KYC norms for its customer dealings and other banking operations. The Internal Control and Compliance Division of the Bank, the inspection teams of Bangladesh Bank and External Auditors conduct inspection of different branches and divisions at Head Office of the Bank and submit reports presenting the findings of the inspections. Necessary control measures and corrective actions have been taken on the suggestions or observations made in these reports.

Approach for calculating capital charge for operational risk:

Bank applies 'Basic Indicator Approach' for calculating capital charge for operational risk as prescribed by BB in revised RBCA guidelines. Under this approach, banks have to calculate average annual gross income (GI) of consecutive last three years and multiply the result by 15% (α factor) to determine required capital charge. Gross Income is the sum of 'Net Interest Income', 'Net non-interest income' and 'Interest Suspense' of a year or it is 'Total Operating Income' of the bank.

Quantitative Disclosure: The capital requirement for operational risk is as follows:

BDT Crore

PARTICULARS	SOLO	CONSOLIDATED
THE CAPITAL REQUIREMENT FOR OPERATIONAL RISK	82.68	83.43

ix. Liquidity Ratio and Risk:

Liquidity ratios are a class of financial metrics used to determine a bank's ability to pay off its short-term debts obligations. Liquidity risk is the risk that a bank may be unable to meet short term financial demands. This usually occurs due to the inability to convert a security or hard asset to cash without a loss of capital and/or income in the process. This is managed by Treasury under the guidance of ALCO.

Views of BOD on system to reduce Liquidity risk:

The Board Risk Management Committee regularly observe the key liquidity risk indicator i.e. Volatile liability dependency ratio, Liquidity Coverage Ratio (LCR), medium term funding ratio, and Net stable funding ratio and provide their valuable opinion. BRMC can communicate observations to ALCO through the CRO if and when needed.

Methods used to measure Liquidity risk:

The stress test for liquidity risk evaluates the resilience of the banks towards the fall in liquid liabilities. The ratio "liquid assets to liquid liabilities" is calculated before and after the application of shocks by dividing the liquid assets with liquid liabilities. Liquid assets are the assets that are easily turned into cash without the threat of loss. They include cash, balances with Bangladesh Bank and balances with banks, call money lending, lending under repo and investment in government securities. Liquid liabilities include the deposits and the borrowings. Appropriate shocks will have to be absorbed to the liquid liabilities if the current liquidity position falls at the rate of 10%, 20% and 30% respectively.

Liquidity risk Management System:

The ALCO of the NRBC Bank regularly monitors the driving factors of liquidity risk called Regulatory liquidity indicators (RLIs). These factors are measures from the following aspects.

- ⊙ Cash Reserve Requirement (CRR)
- ⊙ Statutory Liquidity Ratio (SLR)
- ⊙ Maximum Cumulative Outflow (MCO)
- ⊙ Advance Deposit Ratio (ADR)
- ⊙ Liquidity Coverage Ratio (LCR)
- ⊙ Net Stable Funding Ratio (NSFR)

Policies and process for mitigating liquidity risk:

NRBCB manages liquidity risk in accordance with its ALM Policy and ALCO decisions through Treasury activity. This policy is framed as per the regulatory guidelines, and is approved by the Board of Directors. The ALM Policy is reviewed periodically to incorporate changes as required by regulatory stipulation or to realign with changes in the economic landscape. NRBCB's ALCO formulates and reviews strategies, and provides guidance to manage liquidity risk within the framework laid out in the ALM Policy. The committee proactively manages liquidity risk as a part of its ALM activities.

In order to develop comprehensive liquidity risk management framework, the bank has a Liquidity Contingency Plan (LCP). A set of policies and procedures that serves as a blueprint for the bank to meet its funding needs in a timely

manner and at a reasonable cost. In this sense, LCP is an extension of ongoing liquidity management and formalizes the objectives of liquidity management by ensuring:

- a) Maintenance of reasonable amount of liquid assets.
- b) Measurement and projection of funding requirements and
- c) Management of access to funding sources.

Quantitative Disclosure:

PARTICULARS	BDT CRORE
LIQUIDITY COVERAGE RATIO (LCR)	132.83%
NET STABLE FUNDING RAITO (NSFR)	101.59%
STOCK OF HIGH QUALITY LIQUID ASSETS	3402.30
TOTAL NET CASH OUTFLOW OVER THE NEXT 30 DAYS CALENDAR	3349.05
AVAILABLE AMOUNT OF STABLE FUNDING	11856.73
REQUIRED AMOUNT OF STABLE FUNDING	11670.92

10. Leverage Ratio:

As an additional safeguard against model risk, and measurement error by supplementing the risk based measure, a non-risk based regulatory leverage ratio has been introduced with a simple, transparent and independent measurement of risk.

Views of BOD on system to reduce excessive leverage:

Excessive leverage by banks is widely believed to have contributed to the global financial crisis. Thus Basel III rules have introduced leverage ratio as a non-risk based capital requirements. Board of Directors of our Bank continuously monitoring the exposure limit of lending, capital strength of our Bank in order to avoid building-up excessive on and off-balance sheet leverage.

Approach for calculating exposure:

According to instruction of supervisory body, the bank is calculating leverage ratio and submitted the same to BB on quarterly basis.

Qualitative Disclosure:

PARTICULARS	SOLO	BDT Crore CONSOLIDATED
LEVERAGE RATIO (REQUIRED 3%)	6.59%	6.70%
ON BALANCE SHEET EXPOSURE	15174.84	15263.35
OFF BALANCE SHEET EXPOSURE	1703.06	1703.06
TOTAL EXPOSURE AFTER REGULATORY ADJUSTMENT	16813.63	16902.14

11. Remuneration:

The bodies that oversee remuneration

The bank has a Board approved payroll/remuneration policy which is incorporated in the bank HR policy. MANCOM with the consent of the Board monitors, advises and implements the related issues on required basis. The bank has approved reward policy for the performing employees. Financial benefits may be granted to an employee by the Board or any other authority empowered by the Board for meritorious service. An award in cash or in kind may be

granted to an employee by the Board or any other authority empowered by the Board for the outstanding academic and professional achievements.

Design and Structure of Remuneration:

The Structure of remuneration arrangements for all employees consists of following components:

- ⊙ Fixed Remuneration; and
- ⊙ Variable pay

The fixed remuneration is made up of base remuneration and superannuation. Base remuneration includes salary and allowances paid in cash. Superannuation is paid to the employee at the time of retirement.

Variable pay consists of incentive bonuses award to most of the banks employee which are discretionary and recognize annual performance over the financial year.

In case of following situation remuneration can be adjusted before vesting:

- ⊙ Disciplinary Action (at the discretion of enquiry committee)
- ⊙ Resignation of the employee prior to the payment date.

QUALITATIVE DISCLOSURE	BDT CRORE
NUMBER OF MEETINGS HELD BY THE MAIN BODY OVERSEEING REMUNERATION DURING THE FINANCIAL YEAR AND REMUNERATION PAID TO ITS MEMBER.	
NUMBER OF EMPLOYEES HAVING RECEIVED A VARIABLE REMUNERATION AWARD DURING THE FINANCIAL YEAR.	
NUMBER AND TOTAL AMOUNT OF GUARANTEED (FESTIVAL) BONUS AWARDED DURING THE FINANCIAL YEAR.	9.52 Crore
NUMBER AND TOTAL AMOUNT OF SIGN-ON AWARDS MADE DURING THE FINANCIAL YEAR.	
NUMBER AND TOTAL AMOUNT OF SEVERANCE PAYMENTS MADE DURING THE FINANCIAL YEAR	
TOTAL AMOUNT OF OUTSTANDING DEFERRED REMUNERATION, SPLIT INTO CASH, SHARES AND SHARE-LINKED INSTRUMENTS AND OTHER FORMS.	
TOTAL AMOUNT OF DEFERRED REMUNERATION PAID OUT IN THE FINANCIAL YEAR.	
BREAKDOWN OF AMOUNT OF REMUNERATION AWARDS FOR THE FINANCIAL YEAR TO SHOW: FIXED AND VARIABLE, DEFERRED AND NON-DEFERRED, DIFFERENT FORMS USED (CASH, SHARES AND SHARE LINKED INSTRUMENTS, OTHER FORMS).	(Incentive bonus) yet to decided