Disclosures on Risk Based Capital (Basel III)

<u>For the Year Ended on 31 December 2024</u>

1.0 Scope of Application

Qualitative Disclosure		
a)	The name of the top corporate entity in the group to which this guideline applies.	**Bengal Commercial Bank PLC.**
b)	An outline of differences in the basis of consolidation for accounting & regulatory purposes, with a brief description of the entities within the group i) that are fully consolidated, ii) that are given a deduction treatment and iii) that are neither consolidated nor deducted (e.g. where the investment is risk-weighted).	Bengal Commercial Bank PLC. was incorporated on 3 February 2020 as a Public Limited Company under the Companies Act, 1994. The Bank obtained license from Bangladesh Bank on 23 February 2020 as a scheduled commercial bank and started its commercial operation on 11 March 2021. The principal activities of the bank are to provide all types of commercial banking service to customers through branches, sub-branches, ATMs, corporate, retail and SME units in Bangladesh. As on 31 December 2024 bank had 20 branches (including 3 full fledge Islamic banking branches), 10 sub-branches (including 1 Islamic banking sub-branch) and 7 ATM booths. The disclosure made in the following sections has addressed Bengal Commercial Bank PLC. as a single entity (Solo Basis) as there was no subsidiary as on the reporting date (31 December 2024).
c)	Any restrictions, or other major impediments, on transfer of funds or regulatory capital within the group.	Not applicable
Quantitative Disclosure		
d)	The aggregate amount of surplus capital of insurance subsidiaries (whether deducted or subjected to an alternative method) included in the capital of the consolidated group.	Not applicable

2.00 Capital Structure:

<table>
<tr><td colspan="3">Qualitative Disclosure</td></tr>
<tr><td>a)</td><td>Summary information on the terms and conditions of the main features of all capital instruments, especially in the case of capital instruments eligible for inclusion in CET 1, Additional Tier 1 or in Tier 2 Capital.</td><td>In terms of Section 13 of the Bank Company Act, 1991 (Amended up to date), the terms and conditions of the main features of all capital instruments have been segregated in line with the eligibility criteria set forth vide BRPD Circular No. 18 dated 21 December 2014 [Guidelines on Risk Based Capital Adequacy (Revised Regulatory Capital Framework for Banks in line with Basel III)] and other relevant instructions given by Bangladesh Bank from time to time. The main features of the capital instruments are as follows:

1) Tier 1 Capital (going-concern capital)
a) Common Equity Tier 1 (CET 1)
b) Additional Tier 1 (AT 1)

2) Tier 2 Capital (gone-concern capital)

Common Equity Tier 1 Capital Instruments of Bengal Commercial Bank consists of
i) Paid-up Capital
ii) Statutory Reserve
iii) Retained Earnings

Currently, bank has no Additional Tier 1 Capital instrument.

Tier 2 Capital consists of general provision against unclassified loans and off-balance sheet exposures.</td></tr>
<tr><td colspan="3">Quantitative Disclosures</td></tr>
<tr><td>b, c, & d)</td><td colspan="2">The amount of Regulatory Capital as per audited financial statements as of 31 December 2024 are as follows:</td></tr>
</table>

(BDT in Crore)

Particulars	Amount
Tier 1 Capital	
Common Equity Tier 1 (CET 1) Capital	
Paid-up Capital	490.53
Statutory Reserve	16.82
Retained Earnings	19.74
Less: Goodwill and all other Intangible Assets	0.61
Total Common Equity Tier 1 (CET 1) Capital	**526.49**
Additional Tier 1 (AT 1) Capital (ii)	0.00
Total Tier 1 Capital	**526.49**
Tier 2 Capital	
General Provision against unclassified loans	12.67
General Provision against off-balance sheet exposures	2.94
Total Tier 2 Capital	**15.61**
Total Eligible Capital	**542.10**

3.00 Capital Adequacy

Qualitative Disclosure		
a)	A summary discussion of the Bank's approach to assessing the adequacy of its capital to support current and future activities.	Bengal Commercial Bank assesses the adequacy of its capital in terms of Section 13 (1) of the Bank Company Act, 1991 (Amended up to date) and instruction contained in BRPD Circular No. 18 dated 21 December 2014 [Guidelines on 'Risk Based Capital Adequacy for Banks' (Revised regulatory capital framework in line with Basel III)] and other relevant rules & regulations issued by Bangladesh Bank from time to time. The Bank computes the capital requirement on the basis of following approaches: i) Credit risk: Standardized Approach; ii) Market risk: Standardized Approach; iii) Operational risk: Basic Indicator Approach. The Bank assesses the capital requirement considering the existing size of portfolio, concentration of portfolio to different risk weight groups, asset quality, profit trend etc. The Bank also forecasts the adequacy of capital in terms of its capacity of internal capital generation, maintaining the size of the portfolio, asset quality, conducting credit rating of the borrowers, segregation of portfolio to different risk weight groups etc. Bangladesh Bank vide BRPD Circular Letter No. 18 dated 15 June 2023 instructed to maintain Taka 500 Crore as paid-up capital. As per audited financial statements as of 31 December 2024, Bank's paid-up capital came to Taka 490.53 crore. In reference to Bangladesh Bank Letter No. BRPD(LS-1)745(73)/2025-3477 dated 11 March 2025, Bangladesh Bank has granted an extension to BGCB to comply with this requirement by 30 June 2025. Bangladesh Bank vide DOS Circular Letter No. 20 dated 24 July 2023 instructed to maintain 10% of Risk Weighted Assets (RWA) or Taka 500 crore whichever is higher as Minimum Capital Requirement (MCR) of the bank. As per audited financial statements as on 31 December 2024, 10% of Bank's RWA came to Taka 153.37 crore. Hence, as per

rule, Bank's MCR came to Taka 500 crore. Against that, as of 31 December 2024, Bank maintained total capital (CET 1/Tier 1 and Tier 2) of Taka 542.10 crore. As a result, as of the said date, there was a surplus of Taka 42.10 crore (i.e. Taka 542.10 crore minus Taka 500 crore).

However, Bank's capital to risk-weighted asset ratio (CRAR) as of 31 December 2024 stood at 35.35% (consisting of 34.33% in CET 1 capital and 1.02% in Tier 2 capital) against the regulatory requirement of minimum 12.50% (including 2.5% of Capital Conservation Buffer - CCB).

Quantitative Disclosure

b) Capital requirement for Credit Risk

(BDT in crore)

Particulars	Risk Weighted Assets (RWA)	Minimum Capital Requirement (MCR)
Credit Risk		
On-balance sheet	1,179.25	117.92
Off-balance sheet	125.96	12.60
Total	**1,305.22**	**130.52**

c) Capital requirement for Market Risk

(BDT in crore)

Particulars	Risk Weighted Assets (RWA)	Minimum Capital Requirement (MCR)
Market Risk		
Interest Rate related instrument	6.25	0.62
Equities	70.14	7.01
Foreign exchange position	0.76	0.08
Commodities	0.00	0.00
Total	**77.15**	**7.71**

d) Capital requirement for Operational Risk

(BDT in crore)

Particulars	Risk Weighted Assets (RWA)	Minimum Capital Requirement (MCR)
Operational Risk	151.36	15.14
Total	**151.36**	**15.14**

e) Total Risk Weighted Assets (RWA)

(BDT in crore)

Particulars	Risk Weighted Assets (RWA)	Minimum Capital Requirement (MCR)
Credit Risk	1,305.22	130.52
Market Risk	77.15	7.71
Operational Risk	151.36	15.14
Total	**1,533.73**	**153.37**
Total regulatory capital		**542.10**

<table>
<tr><td>f)</td><td>Total capital, CET1 capital, Total Tier 1 capital and Tier 2 capital ratio for both solo and consolidated basis.</td><td>
<table>
<tr><th>Particulars</th><th>Ratio (%)</th></tr>
<tr><td>Capital to Risk-weighted Asset Ratio (CRAR)</td><td>35.35%</td></tr>
<tr><td>Common Equity Tier 1 Capital Ratio</td><td>34.33%</td></tr>
<tr><td>Tier 1 Capital Ratio</td><td>34.33%</td></tr>
<tr><td>Tier 2 Capital Ratio</td><td>1.02%</td></tr>
</table>
</td></tr>
<tr><td>g)</td><td>Capital Conservation Buffer (CCB)</td><td>
<table>
<tr><th>Particulars</th><th>Ratio (%)</th></tr>
<tr><td>Required ratio of CCB</td><td>2.5%</td></tr>
<tr><td>CCB Maintained</td><td>25.35%</td></tr>
</table>
</td></tr>
<tr><td>h)</td><td>Available Capital under Pillar 2 Requirement</td><td>
(BDT in crore)
<table>
<tr><th>Particulars</th><th>Amount</th></tr>
<tr><td>Total Eligible Capital [A]</td><td>542.10</td></tr>
<tr><td>Minimum Capital Requirement under Pillar 1 [B]</td><td>500.00</td></tr>
<tr><td>Available Capital for Pillar 2 requirement [C=A-B]</td><td>42.10</td></tr>
</table>
</td></tr>
</table>

4.00 Credit Risk:

<table>
<tr><td colspan="3">Qualitative Disclosure</td></tr>
<tr><td colspan="3">a) The general qualitative disclosure requirement with respect to credit risk, including:</td></tr>
<tr><td>i)</td><td>Definitions of past due and impaired (for accounting purposes)</td><td>As per relevant guidelines/circulars of Bangladesh Bank, the impaired loans and advances are defined on the basis of (i) Objective / Quantitative criteria and (ii) Qualitative judgment. For these purposes, all loans and advances are grouped into four (4) categories namely- (a) Continuous Loan (b) Demand Loan (c) Fixed Term Loan and (d) Short-term Agricultural & Micro Credit.

Definition of past due/overdue:

i. Any Continuous Loan if not repaid/renewed within the fixed expiry date for repayment or after the demand by the bank will be treated as past due/overdue from the following day of the expiry date;

ii. Any Demand Loan if not repaid within the fixed expiry date for repayment or after the demand by the bank will be treated as past due/ overdue from the following day of the expiry date;

iii. 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) will be treated as past due/overdue after 3 (three) months of the expiry date;</td></tr>
</table>

		iv. The Short-term Agricultural and Micro-Credit if not repaid within the fixed expiry date for repayment will be considered past due/ overdue after 3 (three) months of the expiry date. However, a continuous loan, demand loan or a term loan which will remain overdue for a period of 2 (two) months or more, will be put into the **"Special Mention Account (SMA)",** the prior status of becoming the Loan into impaired/ classified/ non-performing. **Definition of impaired / classified / non-performing loans and advances are as follows:** **Continuous loans are classified as follows:** • **Substandard:** If it is past due/ overdue for 3 (three) months or beyond but less than 9 (nine) months; • **Doubtful:** If it is past due/ overdue for 9 (nine) months or beyond but less than 12 (twelve) months; and • **Bad/ Loss:** If it is past due/ overdue for 12 (twelve) months or beyond. **Demand loans are classified as follows:** • **Substandard:** If it remains past due/ overdue for 3 (three) months or beyond but not over 9 (nine) months from the date of expiry or claim by the Bank or from the date of creation of forced loan; • **Doubtful:** If it remains past due/ overdue for 9 (nine) months or beyond but not over 12 (twelve) months from the date of expiry or claim by the Bank or from the date of creation of forced loan; and • **Bad/ Loss:** If it remains past due/ overdue for 12 (twelve) months or beyond from the date of expiry or claim by the Bank or from the date of creation of forced loan. **Fixed Term Loans are classified as follows:** • **Substandard:** If the amount of past due installment is equal to or more than 3 (three) months but less than 9 (nine) months; the entire loan will be classified as 'Sub-standard'; • **Doubtful:** If the amount of past due installment is equal to or more than 9 (nine) months but less than 12 (twelve) months; the entire loan will be classified as 'Doubtful'; and

		• **Bad/ Loss:** If the amount of past due installment more than 12 (twelve) months, the entire loan will be classified as 'Bad/Loss'; **Defaulted Loan:** Loans have to be treated as defaulted loan as per section 5(GaGa) of the Bank Company Act, 1991 and to be reported accordingly as per formats given in BRPD Circular No. 8 dated 2 August 2015. In this regard, a portion of the "Sub-standard (SS)" loans will be reported as defaulted loan. **Short-term Agricultural and Micro-credit:** The Short-term Agricultural and Micro Credit will be considered irregular if not repaid within the due date as stipulated in the loan agreement. If the said irregular status continues, the credit will be classified as **'Sub-standard'** after a period of **12 months**, as **'Doubtful'** after a period of **36 months** and as **'Bad/ Loss'** after a period of **60 months** from the stipulated due date as per the loan Agreement. **Cottage, Micro and Small Credits under CMSME:** A Continuous Loan, Demand Loan and Fixed Term Loan will be classified are as under: • **Substandard:** If it is past due/ overdue for 6 (six) months or beyond but less than 18 (eighteen) months; • **Doubtful:** If it is past due/ overdue for 18 (eighteen) months or beyond but less than 30 (thirty) months; and • **Bad/ Loss:** If it is past due/ overdue for 30 (thirty) months or beyond.

ii)	Description of approaches followed for specific and general allowances and statistical methods	The Bank follows the relevant Bangladesh Bank guideline for determination of general and specific allowances for loans and advances. **Firstly,** the base for provision for the unclassified and classified loans are calculated as under: **a) Calculation of base for provision for unclassified loans: For STD,** Loan Outstanding amount only and **for SMA,** Loan Outstanding amount ***less*** suspended interest, if any; **b) Calculation of base for provision for the classified loans, higher of the following two amounts:** i. Outstanding amount ***less*** suspended interest ***less*** value of eligible securities; **or** ii. 15% of outstanding amount. **Secondly,** the following rates are applied on base for provision for determination of general and specific allowances for loans:

Types of Loans and Advances	**Rates of Provision**				
	STD	**SMA**	**SS**	**DF**	**BL**
Consumer Financing (Housing Finance-HF)	1%	1%	20%	50%	100%
Consumer Financing (Professionals)	2%	2%	20%	50%	100%
Consumer Financing (Credit Card)	2%	2%	20%	50%	100%
Consumer Financing (other than HF, Professionals and Credit card)	2%	2%	20%	50%	100%
Loans to Brokerage House, Merchant Banks, Stock Dealers	1%	1%	20%	50%	100%
Small and Medium Enterprise (Medium)	0.25%	0.25%	20%	50%	100%
Small and Medium Enterprise (Cottage, Micro, Small)	0.25%	0.25%	5%	20%	100%
Short Term Agriculture and Micro Credit	1%	1%	5%	5%	100%
Others	1%	1%	20%	50%	100%
Off Balance Sheet Exposure (Other than bills for collection)	1%	N/A			
Off Balance Sheet Exposure (Bills for collection)	0%	N/A			

iii)	Discussion of the bank's credit risk management policy	The salient features of the Bank credit risk management policy and procedures are as under: i) Credit policy approved by the Board; ii) Credit approval delegated properly; iii) Independent Credit Risk Management Division for Corporate, Retail and CMSME portfolio; iv) Separate Credit Administration Division; v) Credit operations subject to independent Internal Audit; vi) Reporting to Board/ Executive Committee/ Risk Management Committee.

		Above all, the Risk Management Division is regularly coordinating with the Credit Risk Management Divisions and other Business Units/ Divisions on increasing the collateral coverage, product/ sector specific diversification of credit exposures, single borrower exposures limit, large loan portfolio ceiling as stipulated by Bangladesh Bank, improving the asset quality, conducting credit rating of the borrowers to minimize the capital charge against credit risk of the Bank. Adequate provision is being maintained as per the status of the loan. Status of loans is regularly reported to the Board of Directors/ Risk Management Committee of the Board.
Quantitative Disclosures		
b)	Total gross credit risk exposures broken down by major types of credit exposures	Major types of credit exposure as per disclosures in the audited financial statements as of 31 December 2024: (BDT in crore)
c)	Geographical distribution of exposures, broken down in significant areas by major types of credit exposure.	Geographical distribution of credit exposures as per the disclosures in the audited financial statements as of 31 December 2024 are as follows: (BDT in crore)

Major types of credit exposure (b):

(BDT in crore)

Particulars	Outstanding	Mix (%)
Continuous Loan	781.24	48.24%
Term Loan	427.43	26.39%
Demand Loan	379.86	23.46%
Staff Loan	5.01	0.31%
Bill purchased and discounted	25.98	1.60%
Total Loans and Advances	**1,619.53**	**100.00%**

Geographical distribution (c):

(BDT in crore)

Divisions	Outstanding	Mix (%)
Urban		
Dhaka	1,321.09	81.57%
Chattogram	133.35	8.23%
Khulna	-	-
Sylhet	-	-
Barishal	-	-
Rajshahi	22.16	1.37%
Rangpur	13.87	0.86%
Mymensingh	-	-
Sub-total	**1,490.47**	**92.03%**
Rural		
Dhaka	104.73	6.47%
Chattogram	19.56	1.21%
Khulna	-	-
Sylhet	-	-
Barishal	-	-
Rajshahi	2.03	0.13%
Rangpur	2.75	0.17%
Mymensingh	-	-
Sub-total	**129.07**	**7.97%**
Total Loans and Advances	**1,619.53**	**100.00%**

d)	Industry or counterparty type distribution of exposures, broken down by major types of credit exposures.	Industry or counterparty type distribution of exposures, broken down by major types of credit exposures as per the disclosures in the audited financial statements as of 31 December 2024 are as follows:

(BDT in crore)

Particulars	Outstanding	Mix (%)
i) Agriculture	47.50	2.93%
ii) Industry		
Food Manufacturing	199.08	12.29%
RMG Industry	101.74	6.28%
Textile Industry	91.38	5.64%
Furniture and Fixtures	0.38	0.02%
Paper and Paper Products	78.95	4.87%
Leather and Leather Products	32.02	1.98%
Rubber And Plastic Industries	34.63	2.14%
Chemical and Chemical Products	56.92	3.51%
Basic Metal Products	57.06	3.52%
Electrical Machinery and Apparatus	11.32	0.70%
Pharmaceutical	19.92	1.23%
Other Manufacturing Industries	287.13	17.73%
Others	166.56	10.28%
iii) Constructions	92.26	5.70%
iv) Power, Gas, Water and Sanitary Services	1.00	0.06%
v) Trade Services	166.05	10.25%
vi) Housing Services	25.24	1.56%
vii) Transport, Storage and Communication	1.82	0.11%
viii) Professional and Misc. Services	143.56	8.86%
ix) Staff Loan	5.01	0.31%
Total Loans and Advances	**1,619.53**	**100.00%**

e)	Residual contractual maturity breakdown of the whole portfolio, broken down by major types of credit exposure.	Residual contractual maturity of exposures as per the disclosures furnished in the audited financial statements as of 31 December 2024 are as follows:

(BDT in crore)

Particulars	Outstanding	Mix (%)
On demand	182.42	11.26%
Not more than three months	375.99	23.22%
Over three months but not more than one year	542.43	33.49%
Over one year but not more than five years	374.60	23.13%
Above five years	144.09	8.90%
Total Loans and Advances	**1,619.53**	**100.00%**

f)	By major industry or counterparty type	i) Amount of impaired loans and if available, past due loans, provided separately

(BDT in Crore)

Particulars	Outstanding	
	NPL	SMA
Continuous Loan	7.47	7.82
Demand Loan	4.88	11.28
Term Loan	0.60	7.30
Short Term Agri and Micro Credit	0.00	0.00
Total	**12.95**	**26.40**

ii) Specific and General Provision

(BDT in Crore)

Particulars	Amount
Specific provision for loans and advances	0.77
General provision for loans and advances	12.67
General provision for off-balance sheet exposures	2.94
Total	**16.38**

iii) Charges for specific allowances and charges-off during the year 2024

(BDT in Crore)

Particulars	Amount
Specific provision for loans and advances	0.77
General provision for loans and advances	0.96
General provision for off-balance sheet exposures	(1.10)
Total	**0.63**

g)	Gross Non-Performing Assets (NPAs)	Position of Non-Performing Loans and Advances including bills purchased and discounted of the Bank as per audited financial statements for the year ended 31 December 2024 was as under:

(BDT in Crore)

Particulars	Amount
Gross Non-Performing Assets (NPAs)	12.95
Non-Performing Assets (NPAs) to Outstanding Loans & advances	0.80%
Movement of Non-Performing Assets (NPAs)	
Opening balance	0.00
Additions/ adjustment during the year (net)	12.95
Closing balance	12.95
Movement of specific provisions for NPAs	
Opening balance	0.00
Add: Provision made during the year	0.77
Less: Write - off	0.00
Add: Recoveries of amounts previously written-off	0.00
Closing balance	0.77

5.00 Equities: Disclosures for Banking Book Positions:

Qualitative Disclosures		
The general qualitative disclosure requirement with respect to equity risk, including:		
a)	i) Differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons	Investment in equity securities is broadly categorized into two parts: **Quoted Securities:** These securities are bought and held primarily for the purpose of selling in the future or holding for dividend income, which is reported at cost. Unrealized gains are not recognized in the profit and loss statement. But required provisions are kept for diminution in value of the investment. **Unquoted Securities:** Investment in non-listed securities is reported at a cost under the cost method. Adjustment is given for any shortage of book value over cost for determining the carrying amount of investment in non-listed securities.
	ii) Discussion of important policies covering the valuation and accounting of equity holdings 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.	As per Bangladesh Bank DOS Circular no. 5 dated 28 January 2009, HFT securities are revalued each week using the marked to market concept and the HTM securities are amortized once in a year according to Bangladesh Bank guidelines. HTM securities are also revaluated if they are reclassified to the HFT category with the Board approval.

VALUATION & ACCOUNTING OF INVESTMENT

Investment Class	Initial Recognition	Measurement after Recognition	Recording of changes
Treasury Bill/Bond (HFT)	Cost	Fair Value	Loss to profit and loss account, gain to revaluation reserve
Treasury Bill/Bond (HTM)	Cost	Amortized Value	Increase or decrease in value of equity
Debenture/Bond	Face Value	None	None
Shares (Quoted)	Cost	Lower of cost or market value	Loss (net) to profit and loss account but no unrealized gain booking
Prize Bond	Cost	None	None

<table>
<tr><th colspan="3">Quantitative Disclosures</th></tr>
<tr><td>b)</td><td>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.</td><td>Values disclosed in balance sheet of investment in share as on 31 December 2024 was as under:
(BDT in Crore)
<table>
<tr><th>Particulars</th><th>Cost Price</th><th>Market Price</th></tr>
<tr><td>Investment in quoted shares</td><td>45.01</td><td>34.05</td></tr>
<tr><td>Investment in unquoted shares</td><td>1.00</td><td>1.02</td></tr>
</table></td></tr>
<tr><td>c)</td><td>The cumulative realized gains (losses) arising from sales and liquidations in the reporting period</td><td>(BDT in Crore)
<table>
<tr><th>Particulars</th><th>Amount</th></tr>
<tr><td>Cumulative realized gains (Loss)</td><td>0.60</td></tr>
</table></td></tr>
<tr><td>d)</td><td>• Total unrealized gains (losses)
• Total latent revaluation gains (losses)
• Any amounts of the above included in Tier 2 capital.</td><td>(BDT in Crore)
<table>
<tr><th>Particulars</th><th>Amount</th></tr>
<tr><td>Total unrealized gain (loss)</td><td>(10.94)</td></tr>
<tr><td>Total latent revaluation gain (loss)</td><td>-</td></tr>
<tr><td>Any amounts of the above included in Tier 2 capital</td><td>-</td></tr>
</table></td></tr>
<tr><td>e)</td><td>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.</td><td>(BDT in Crore)
<table>
<tr><th>Capital Charge for equities</th><th>Amount</th></tr>
<tr><td>For Specific Risk</td><td>3.51</td></tr>
<tr><td>For General Market Risk</td><td>3.51</td></tr>
<tr><td>Total capital charge</td><td>7.01</td></tr>
</table></td></tr>
</table>

6.00 Interest Rate Risk in the Banking Book (IRRBB):

<table>
<tr><th colspan="3">Qualitative Disclosures</th></tr>
<tr><td>a)</td><td>The general qualitative disclosure requirement including the nature of IRRBB and key assumptions, including assumptions regarding loan repayments and behavior of non-maturity deposits, and frequency of IRRBB measurement.</td><td>Interest rate risk has potential impact on the Bank's earnings (Net Interest Income- NII) and net asset values due to changes in market interest rates. Interest rate risk arises when the Bank's principal and interest cash flows (including final maturities), for both On and Off-balance sheet exposures, have mismatched re-pricing dates. The amount at risk is a function of the magnitude and direction of interest rate changes and the size and maturity structure of the mismatch position. The portfolio of assets and liabilities in the banking book sensitive to interest rate changes is the element of interest rate risk.

The immediate impact of changes in interest rates is on the Bank's net interest income (difference between interest income accrued on rate sensitive asset portfolio and interest expenses accrued on rate</td></tr>
</table>

sensitive liability portfolio) for a particular period of time, while the long-term impact is on the Bank's net worth since the economic value of the Bank's assets, liabilities and off-balance sheet exposures are affected.

Key assumptions on loan prepayments and behavior of non-maturity deposits:

a) Loans with defined contractual maturity are re-priced in the respective time buckets in which it falls as per the loan repayment schedule;
b) Loans without defined contractual maturity are segregated into different time buckets based on the past trend, seasonality, geographical perspective and re-priced accordingly; and
c) Non-maturity deposits namely current, saving deposits are segregated into different time buckets on the basis of past trend of withdrawal, seasonality, religious festivals, geographical perspective and re-priced accordingly.

Quantitative Disclosures

b) The increase (decline) in earnings or economic value (or relevant measure used by management) for upward and downward rate shocks according to management's method for measuring IRRBB, broken down by currency (as relevant).

The impact of changes in interest rate for On-balance sheet rate sensitive assets and liabilities as per the audited financial statements as of 31 December 2024 is furnished below:

(BDT in Crore)

Particulars	**3 Months**	**6 Months**	**1 Year**
Rate sensitive assets **[A]**	1,037.35	480.22	255.61
Rate sensitive liabilities **[B]**	990.52	312.38	193.92
GAP **[A-B]**	46.83	167.84	61.69
Cumulative GAP	46.83	214.67	276.36
Interest rate change (IRC) **[Note 1]**	1%	1%	1%
Quarterly earnings impact **[GAP x IRC]**	0.47	2.15	2.76
Cumulative earnings impact	0.47	2.62	5.38

Note 1: Assuming 1% rise in interest rates for both asset and liability portfolio of the Bank and vice-versa.

7.00 Market Risk:

Qualitative Disclosures		
a)	i. Views of Board of Directors on trading/ investment activities	The Board approves all policies related to market risk, set limits and reviews compliance on a regular basis. The objective is to provide cost effective funding to finance assets growth and trade related transactions. The market risk covers the followings risks of the Bank's balance sheet: i) Interest rate risk; ii) Equity price risk; iii) foreign exchange risk; iv) Commodity price risk.
	ii. Methods used to measure Market Risk	Standardized Approach has been followed to measure the Market Risk for capital requirement for trading book of the Bank. The total capital requirement in respect of market risk is the aggregate capital requirement calculated for each of the risk sub-categories. For each risk category minimum capital requirement is measured in terms of two separately calculated capital charges for "specific risk" and "general market risk".
	iii. Market Risk Management system	The Treasury Division of the Bank manages market risk covering liquidity, interest rate and foreign exchange risks with oversight from Assets-Liability Management Committee (ALCO) comprising senior executives of the Bank. ALCO is chaired by the Managing Director & CEO. ALCO meets at least once in a month. The Risk Management Division also reviews the market risk parameters on monthly basis and recommends on portfolio concentration for containing the RWA.
	iv. Policies and processes for mitigating market risk	There are approved limits for Market risk related instruments both on balance sheet and off-balance sheet items. The limits are monitored and enforced on a regular basis to protect against market risks. The ALCO of the Bank meets on regular basis to review the prevailing market condition, exchange rate, foreign exchange position and transactions to mitigate foreign exchange risks.
Quantitative Disclosures		
b)	The capital requirements for market risk	(see table below)

(BDT in Crore)

The Capital Requirements for:	**Amount**
i) Interest rate risk	0.62
ii) Equity position risk	7.01
iii) Foreign exchange risk	0.08
iv) Commodity risk	0.00
Total capital requirement for Market risk	**7.71**

8.00 Operational Risk:

Qualitative Disclosures		
a)	i. Views of Board of Directors on system to reduce Operational Risk	The policy for operational risks including internal control and compliance risk is approved by the Board in line with the relevant guidelines of Bangladesh Bank. Audit Committee of the Board directly oversees the activities of Internal Control and Compliance Division (IC&CD) to protect against all operational risks. As a part of continued surveillance, the Senior Management Team (SMT), Executive Risk Management Committee (ERMC) and Risk Management Division regularly review different aspects of operational risk. The analytical assessment is reported to the Board/ Risk Management Committee/ Audit Committee of the Bank for review and formulating appropriate policies, tool & techniques for mitigation of operational risk.
	ii. Performance gap of executives and staffs	Bengal Commercial Bank has a policy to provide competitive package and best working environment to attract and retain the most talented people available in the industry. BGCB recognizes the importance of having the right people at right positions to achieve organizational goals.
	iii. Potential external events	There are non-diversifiable external factors that can affect the operations of the business directly or indirectly. BGCB operates its banking business under an umbrella of interconnected socio-economic and political environment where macro-economic conditions, regulatory changes, change in demand, and the status of infrastructure significantly influence the Bank's performance. The Bank has a separate mechanism to address such kinds of events.
	iv. Policies and processes for mitigating operational risk	Internal Control and Compliance Division have a key role in identifying and mitigating operational risk. This division works relentlessly under the guidance of the Board Audit committee to manage operational risk issues of the Bank. The audit committee delivers policies and directions from time to time to keep the operational efficiency of the Bank up to the mark. In addition, Bank's Anti- Money laundering activities are headed by CAMLCO and their activities are devoted to protect against all money laundering and terrorist finance related activities. The Central Customer Service & Complaint Management Cell was also engaged in mitigating the operation risks of the Bank. Apart from that, there is adequate check and balance at every stage of operation, authorities are properly segregated and there is at least dual control on every transaction to protect against operational risk.

	v. Approach for calculating capital charge for operational risk	The Bank follows the Basic Indicator Approach (BIA) in terms of BRPD Circular No. 18 dated 21 December2014 [Guidelines on 'Risk Based Capital Adequacy for Banks' (revised regulatory capital framework in line with Basel III)]. The BIA stipulates the capital charge for operational risk as a fixed percentage, denoted by α(alpha) of average positive annual gross income of the Bank over the past three years. It also states that if the annual gross income for any year is negative or zero, that should be excluded from both the numerator and denominator when calculating the average gross income. The capital charge for operational risk is enumerated by applying the following formula: $K = [(GI1 + GI2 + GI3)\ \alpha]/n$ Where: K = the capital charge under the Basic Indicator Approach GI = only positive annual gross income over the previous three years (i.e. negative or zero gross income if any shall be excluded) α = 15 percent n = number of the previous three years for which gross income is positive.

Quantitative Disclosures

b) The capital requirements for operational risk

(BDT in Crore)

Particulars	Amount
Gross Income of last 3 years:	
Year-1	48.21
Year-2	95.93
Year-3	158.58
Average gross Income	**100.91**
Capital Requirement for Operational Risk (15% of average gross income**)**	**15.14**

9.00 Liquidity Ratio:

Qualitative Disclosures		
a)	Views of BOD on system to reduce liquidity Risk	The Board of Directors reviews the liquidity risk of the Bank on quarterly basis while reviewing the Quarterly Financial Statements, Stress Testing Report etc. Besides, the Board also reviews the liquidity position while reviewing the management information system reports on monthly basis. Upon reviewing the overall liquidity position along with the outlook of the Bank funding need, investment opportunity, market/ industry trend, the Board takes its strategic decision regarding deposits, funding, investments, loans as well as interest rates policies etc. The Board of the Bank always strives to maintain adequate liquidity to meet up Bank's overall funding need for the retail depositors, borrowers' requirements as well as maintain regulatory requirements.
b)	Methods used to measure Liquidity Risk	The maintenance of Cash Reserve Requirement (CRR) and Statutory Liquidity Ratio (SLR) is considered as the fundamental methods/ tools to measure the liquidity position/ risk of the bank. However, under Basel III, the following methods and tools are mandated for measuring the liquidity risk. a) **Liquidity Coverage Ratio (LCR):** Liquidity Coverage Ratio ensures to maintain an adequate level of stock of high-quality liquid assets that can be converted into cash to meet its liquidity needs (i.e. total net cash outflows) over the next 30 calendar days. b) **Net Stable Funding Ratio (NSFR):** Net Stable Funding Ratio aims to limit over-reliance on short-term wholesale funding during times of abundant market liquidity and encourage better assessment of liquidity risk across all on- and off-balance sheet items. The minimum acceptable value of this ratio is 100 percent, indicating that, available stable funding (ASF) should be at least equal to required stable funding (RSF). ASF consists of various kinds of liabilities and capital with percentage weights attached given their perceived stability. RSF consists of assets and off-balance sheet items also with percentage weights attached given the degree to which they are illiquid or "long-term" and therefore requires stable funding.

<table>
<tr><td></td><td></td><td>In addition to the above, the following measures have been put in place to monitor the liquidity risk management position of the Bank on a continued manner:

a. Statutory Liquidity profile (SLP);
b. Advance Deposit Ratio (ADR);
c. Whole sale borrowing capacity; and
d. Maximum Cumulative Outflow (MCO).

Besides the above, the following tools are also used for measuring liquidity risk:
a) Stress Testing (Liquidity Stress); and
b) Net open position limit</td></tr>
<tr><td>c)</td><td>Liquidity Risk management system</td><td>The liquidity risk is primarily managed by the Treasury Division under oversight of ALCO which is headed by the Managing Director & CEO along with other members of the senior management team. Treasury Division upon reviewing the overall funding requirements on daily basis sets their strategy to maintain a comfortable/ adequate liquidity position taking into consideration of Bank's approved credit deposit ratio, liquid assets to total assets ratio, asset-liability maturity profile, Bank's earning/ profitability as well as overall market behavior and sentiment etc.

Apart from the above, Risk Management Division (RMD) also monitors & measures the liquidity risk in line with the Basel III liquidity measurement tools, namely, LCR, NSFR, Leverage Ratio. RMD addresses the key issues and strategies to maintain the Basel III liquidity ratios to the respective division(s) on regular interval.</td></tr>
<tr><td>d)</td><td>Policies and processes for mitigating liquidity risk</td><td>The Asset-Liability (ALCO) policy leads the process & procedures for mitigation of liquidity risk of the Bank. ALCO works under specific Terms of References (functions) approved by the Board. Treasury Division and ALM desk under regular supervision of Top Management reviews the overall liquidity position of the Bank and takes appropriate strategy, process in line with the industry position for managing liquidity risk of the Bank.</td></tr>
<tr><td colspan="3">Quantitative Disclosures</td></tr>
<tr><td>b)</td><td colspan="2">(BDT in Crore)</td></tr>
</table>

Sl. No.	**Particulars**	**As on 31 Dec 2024**
i)	Liquidity Coverage Ratio (LCR) [%]	162.62%
ii)	Net Stable Funding Ratio (NSFR) [%]	135.60%
iii)	Stock of High-quality liquid assets (HQLA)	461.05
iv)	Total net cash outflows over the next 30 calendar days	283.51
v)	Available Stable Funding (ASF)	2,373.30
vi)	Required Stable Funding (RSF)	1,750.25

10.00 Leverage Ratio:

Qualitative Disclosures		
a)	i) Views of Board of Directors on system to reduce excessive leverage	In order to avoid building-up of an excessive on and off-balance sheet leverage in the banking system, a simple, transparent and non-risk-based leverage ratio has been introduced under the Base III framework. 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. Besides, Board Risk Management Committee (BRMC) also reviews the leverage ratio and other liquidity position/ratios while reviewing the comprehensive risk management report on time-to-time.
	ii) Policies and processes for managing excessive on and off-balance sheet leverage	To manage excessive leverage, the Bank follows all regulatory requirements for capital, liquidity, commitment, Advance Deposit Ratio (ADR), Maximum Cumulative Outflow (MCO), and other standards set by Bangladesh Bank. The aim is to ensure that the high leverage inherent in banking business models is carefully and prudently managed.
	iii) Approach for calculating exposure	For calculating "leverage", the Bank follows the 'Leverage Ratio' approach/ method as suggested by Bangladesh Bank as under $\text{Leverage Ratio} = \frac{\text{Tier} - 1\ \text{Capital (after related deductions)}}{\text{Total Exposure (after related deductions)}}$
Quantitative Disclosures		
b)		

(BDT in Crore)

Sl. No.	Particulars	As on 31 Dec 2024
i)	Tier-1 Capital (considering all regulatory adjustments)	526.49
ii)	On -balance sheet exposure	2,769.06
iii)	Off-balance sheet exposure	0.77
iv)	Total exposure after regulatory adjustments	2,768.30
v)	**Leverage ratio (%)**	**18.14%**

11.00 Remuneration:

Qualitative Disclosures		
a)	Information relating to the bodies that oversee remuneration	Managing Director, Senior Management Team (SMT) & Head of Human Resources Division govern the remuneration related policies and practices in alignment of the Bank’s short- & long-term objectives. They play an independent role, operating as an overseer; and if required, makes recommendation to the Board of Directors of the Bank for its consideration and final approval for any

		remuneration related policy. The main work includes presenting recommendations to the Board regarding remuneration, compensation packages of senior management, incentive schemes and retirement benefits. They also assist the Board of Directors to ensure that all employees are remunerated fairly and get performance-based compensation by ensuring effective remuneration policy, procedures and practices aligned with the Banks' strategy and applied consistency for all employee levels.
b)	Information relating to the design and structure of remuneration processes	BGCB has a flexible compensation and benefits system that helps to ensure pay equity is linked with performance that is understood by employees, and keeps in touch with employee desires and what's converted in the market, while maintaining a balance with the business affordability. The compensation and benefits are regularly reviewed through market and peer group study. The well-crafted total rewards help the Bank to attract, motivate and retain talent that produces desired business results. The structure and level of remuneration are reviewed time to time based on Bank's business performance and affordability. Other than the regular monthly payments and a good number of allowances, BGCB has variety of market-competitive benefits schemes. The various cash and non-cash benefits include; Bank provided chauffeured car facility for top level executives, car maintenance allowance, leave fare assistance, employee car loan facility, festival bonus, noboborsho bonus etc. BGCB also provides long term as well as retirement benefits to employees, like leave encashment, provident fund, benefit under gratuity & superannuation fund etc. The overall objective of the Bank's remuneration policy is to establish a framework for attracting, retaining and motivating employees, and creating incentives for delivering long-term performance within established risk limits.
c)	Description of the ways in which current and future risks are taken into account in the remuneration processes;	The business risk including credit/default risk, compliance & reputational risk are mostly considered when implementing the remuneration measures for each employee/group of employees. Financial and liquidity risk are also considered. Different set of measures are in practice based on the nature & type of business lines/segments etc. These measures are primarily focused on the business target/goals set for each area of operation, branch vis-à-vis the actual results achieved as of the reporting date. The most vital tools & indicators used for measuring the risks are the asset quality (NPL ratio), Net Interest Margin (NIM), provision coverage ratio, credit deposit ratio, cost-income ratio, growth of net profit, as well the non-financial indicators, namely, the compliance

		status with the regulatory norms, instructions have been brought to all concerned of the Bank from time to time. While evaluating the performance of each employee annually, all the financial and non-financial indicators as per pre-determined set criteria are considered; and accordingly, the result of the performance varies from one to another and thus affect the remuneration as well. No material change has been made during the year 2024 that could the affect the remuneration.
d)	Description of the ways in which the bank seeks to link performance during a performance measurement period with levels of remuneration;	The Board sets the Key Performance Indicators (KPIs) for the senior management while approving the business target/budget for each year for the Bank and business lines/segments. The management sets the appropriate tools, techniques and strategic planning (with due concurrence/approval of the Board) towards achieving those targets. The most common KPIs are the achievement of loan, deposit and profit target with the threshold of NPL ratio, cost-income ratio, cost of fund, yield on loans, provision coverage ratio, capital to risk weighted asset ratio (CRAR), ROE, ROA, liquidity position (maintenance of CRR and SLR) etc.
e)	Description of the ways in which the bank seek to adjust remuneration to take account of longer-term performance;	The Bank pays variable remuneration i.e. annual increment on cash basis with the monthly pay. While the value of longer-term variable part of remuneration i.e. the amount of Provident Fund & Gratuity Fund is made provision on aggregate /individual employee basis; actual payment is made upon retirement, resignation etc. as the case may be, as per rule.
f)	Description of the different forms of variable remuneration that the bank utilizes and the rationale for using these different forms;	**A summary of Short-term and Long-term compensation plan are as follows:** Total Compensation = Fixed Pay (Salary) + Variable Pay (Bonus) + Variable Pay (Long term incentive). **Form of variable remuneration offered by Bengal Commercial Bank:** **Cash Form:** **Short-Term Incentive/Rewards** 1. Yearly fixed and incentive bonus; 2. Yearly increment; 3. Business accomplishment financial award; 4. Car fuel and car maintenance allowance for executives; 5. Cash risk allowance for cashier; 6. Charge allowance for branch manager.

		Long-Term Incentive/Rewards 1. Provident fund; 2. Gratuity; 3. Employee house building loan with minimum interest rate; 4. Provident fund loan with minimum interest rate; 5. Periodically salary review (enhancement) 6. Furniture allowance for executives; **Non-Cash Form:** **1) Short-Term Incentives/Rewards:** Accelerate promotion for top talents; **2) Long-Term Incentives/Rewards:** Foreign training award;
Quantitative Disclosures		
g)	Number of meetings held by the main body overseeing remuneration during the financial year and remuneration paid to its member	2 meetings
h)	i) Number of employees having received a variable remuneration award during the financial year	Nil
	ii) Number and total amount of guaranteed bonuses awarded during the financial year	Eid -Ul-Fitr Bonus, 359 Employees, BDT. 1.35 Crore Eid-Ul-Azha Bonus, 374 Employees, BDT. 1.40 Crore
	iii) Number and total amount of sign-on awards made during the financial year	Nil
	iv) Number and total amount of severance payments made during the financial year	Details of severance payments during the year 2024 are appended below:

Type of Severance Payment	Nos. of employee	BDT in Crore
Leave encashment	33	0.29

<table>
<tr><td rowspan="2">i)</td><td>i) Total amount of outstanding deferred remuneration, split into cash, shares and share-linked instruments and other forms</td><td>Nil</td></tr>
<tr><td>ii)Total amount of deferred remuneration paid out in the financial year</td><td>Nil</td></tr>
<tr><td>j)</td><td>Breakdown of amount of remuneration awards for the financial year to show:</td><td>i) Fixed and variable remuneration paid in 2024 are as follows:
<table>
<tr><th>Particulars</th><th>BDT in Crore</th></tr>
<tr><td>Basic salary</td><td>16.57</td></tr>
<tr><td>Allowances</td><td>18.69</td></tr>
<tr><td>Festival bonus</td><td>2.81</td></tr>
<tr><td>Provident fund contribution</td><td>1.49</td></tr>
<tr><td>Total</td><td>39.56</td></tr>
</table>
ii) Deferred and non-deferred: Nil
iii) Different forms used (cash, shares and share linked instruments, other forms): All the remunerations have provided in the form of cash.</td></tr>
<tr><td rowspan="4">k)</td><td colspan="2">Quantitative information about employees’ exposure to implicit (e.g. fluctuations in the value of shares or performance units) and explicit adjustments (e.g. claw backs or similar reversals or downward revaluations of awards) of deferred remuneration and retained remuneration</td></tr>
<tr><td>i)Total amount of outstanding deferred remuneration and retained remuneration exposed to ex post explicit and/or implicit adjustments</td><td>Nil</td></tr>
<tr><td>ii)Total amount of reductions during the financial year due to ex-posts explicit adjustments</td><td>Nil</td></tr>
<tr><td>iii)Total amount of reductions during the financial year due to ex post implicit adjustments</td><td>Nil</td></tr>
</table>