

# Disclosures on Risk Based Capital (Under Pillar-3 of Basel-III Framework) For the year ended 31 December 2018

#### **Scope of Application**

Q	Qualitative Disclosures:						
a)	The name of the top corporate entity in the group to which this guidelines applies.	South Bangla Agriculture and Commerce Bank Limited (the Bank)					
b)	<ul> <li>An outline of differences on the basis of consolidation for accounting and regulatory purposes, with a brief description of the entities within the group</li> <li>(a) that are fully consolidated;</li> <li>(b) that are given a deduction treatment; and</li> <li>(c) that are neither consolidated nor deducted (e.g. where the credit is risk-weighted).</li> </ul>	The Risk Based Capital Adequacy framework applies to South Bangla Agriculture and Commerce Bank Limited on "Solo Basis" as there is no subsidiary of the bank on reporting date. South Bangla Agriculture and Commerce Bank Limited (the Bank) is a scheduled commercial bank. Incorporated as a public limited company under the Companies Act 1994, the Bank obtained license from Bangladesh Bank on 25 <sup>th</sup> March 2013 and started its banking business on 28 <sup>th</sup> April 2013. The number of branches was 74(seventy four) as on 31 December 2018 all over Bangladesh. The principal activities of the Bank are to carry on all kinds of commercial banking business in Bangladesh.					
c)	Any restrictions, or other major impediments, on transfer of funds or regulatory capital within the group.	Not applicable					
Qu	antitative Disclosures:						
d)	The aggregate amount of capital deficiencies in all subsidiaries not included in the consolidation that are deducted and the name(s) of such subsidiaries	Not applicable					

SBAC Bank Limited



### **Capital Structure**

Qu	alitative Disclosures:	
a)	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.	In terms of Section 13 of the Bank Company Act, 1991 (Amended upto 2018), the terms and conditions of the main features of all capital instruments have been segregated in terms of 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:
		Common Equity Tier 1 (CET1) capital instruments
		<b>Paid-up share capital:</b> Issued, subscribed and fully paid up share capital of the Bank.
		<b>Non-repayable share premium account:</b> Amount of premium realized with the face value per share at the time of issuing shares through initial public offering.
		<b>Statutory reserve:</b> As per Section 24 of the Bank Company Act, 1991(Amended upto 2018), every banking company shall create a statutory reserve and if the amount of such fund together with the amount in the share premium account is less than its paid up capital, shall transfer an amount not less than 20% of profit before taxes to the statutory reserve fund.
		<b>Dividend equalization account:</b> As per BRPD Circular Letter No. 18 dated 20 October 2002 issued by Bangladesh Bank, 'Dividend Equalization Account' has been created by transferring the amount from the profit that is equal to the cash dividend paid in excess of 20%.
		<b>Retained earnings:</b> Amount of profit retained with the banking company after meeting up all expenses, provisions and appropriations.
		Additional Tier 1 (AT1) capital instruments
		<b>Instruments issued by the banks that meet the qualifying criteria</b> <b>for AT1:</b> Issued, subscribed and fully paid perpetual subordinate debt/bond which meets the qualifying criteria for AT1 as stipulated guidelines on Risk Based Capital Adequacy.
		Tier 2 capital instruments
		General provision against unclassified loans and off-balance sheet exposures: As per Bangladesh Bank directive, amount of general provision maintained against unclassified loans and off- balance sheet exposures as of the reporting date has been considered.
		<b>Subordinated debt capital:</b> In compliance with BRPD Circular No. 18 dated 21 December 2014, Subordinated Debt is considered as a component of Tier 2 capital.
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### **Capital Structure (continued)**

		<ul> <li>Assets revaluation reserves: As per Bang instruction, until 31 December 2014, 50% of increat Bank's assets has been considered. Revaluation based on the position as of 31 December 2014 w</li> <li>@ 20% on yearly basis from 2015 to 2019 u guideline.</li> <li>Revaluation reserves of HTM securities: As p Bank's instruction, until 31 December 2014, 50% reserve of HTM securities has been considere Reserve (RR) based on the position as of 31 December 2015 Basel III guideline.</li> <li>Revaluation reserves of HFT securities: As per Bank's instruction, until 31 December 2014, 50% of reserve of HFT securities has been considered be deducted @ 20% on yearly basis from 2015 Basel III guideline.</li> <li>Revaluation reserves of HFT securities: As per Bank's instruction, until 31 December 2014, 50% of reserve of HFT securities has been considered. Re Reserve (RR) based on the position as of 31 December 2014, 50% of reserve (RR) based on the position as of 31 December 2014, 50% of reserve (RR) based on the position as of 31 December 2014, 50% of reserve (RR) based on the position as of 31 December 2014, 50% of reserve (RR) based on the position as of 31 December 2014, 50% of reserve (RR) based on the position as of 31 December 2014, 50% of reserve (RR) based on the position as of 31 December 2015 basel III guideline.</li> </ul>	mental value of Reserve (RR) fill be deducted inder Basel III er Bangladesh of revaluation d. Revaluation ember 2014 will to 2019 under Bangladesh frevaluation valuation mber 2014 will
Qua	antitative Disclosures		
b)	The amount of Common Equity Tier 1 (CET1) Capital	The amount of Common Equity Tier 1 (CET1) ( disclosures in the audited financial statements as of 2018 are as follows:	31 December
		Particulars	In million Taka Amount
		Paid up capital	5,658.23
		Non-repayable share premium account	-
		Statutory reserve	1,126.91
		General reserve	-
		Retained earnings	582,62
		Dividend equalization account	-
		Other (if any item approved by Bangladesh Bank)	-
		Sub-Total of Tier 1 Capital [A]	7,367.76
c)	The amount of Additional Tier 1 (AT1) Capital	The amount of Additional Tier 1 (AT1) Capital as per di audited financial statements as of 31 December 2018 a	sclosures in the re as follows:
			In million Taka
		Particulars	Amount
		Non-cumulative irredeemable preference shares	-
		Instruments issued by the banks that meet the	-
		qualifying criteria for AT1 Other (if any item approved by Bangladesh Bank)	-
		Sub-Total AT1 Capital [B]	-



### **Capital Structure (continued)**

d)	The amount of Tier 2 Capital	The amount of Tier 2 Capital as per disclosures in the statements as of 31 December 2018 are as follows:	audited financial
		statements as of of December 2010 are as follows.	In million Taka
		Particulars	Amount
		General provision against unclassified loans and off-balance sheet exposures	469.67
		All other preference shares	-
		Subordinate debt	-
		Revaluation Reserves as on 31 December 2014 (50% of Fixed Assets and HFT Securities)	22.01
		Other (if any item approved by Bangladesh Bank)	-
		Sub-Total of Tier 2 Capital [C]	491.68
e)	Regulatory Adjustments / Deductions from Capital		In million Taka
		Particulars	Amount
		Deferred tax assets against the specific loan loss provision and other intangible assets (computer software) from CET 1 capital	-
		Revaluation Reserves for Fixed Assets, Securities (80% for the year 2018) from Tier 2 Capital	17.61
		Sub-Total of Regulatory Adjustments / Deductions from Capital[D]	17.61
f)	Total Eligible Capital		In million Taka
		Particulars	Amount
		Total Eligible Capital [A+B+C-D]	7,841.83

#### **Capital Adequacy**

Qua	alitative Disclosures	
a)	A summary discussion of the bank's approach to assessing the adequacy of its capital to support current and future activities.	The Bank assesses the adequacy of its capital in terms of Section 13 (1) of the Bank Company Act, 1991 (Amended up to 2018) 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 & regulation issued by Bangladesh Bank from time to time. However, in terms of the regulatory guidelines, the Bank computes the capital charge / requirement as under:
		<ul> <li>Credit risk : On the basis of Standardized Approach;</li> <li>Market risk : On the basis of Standardized Approach; and</li> <li>Operational risk: On the basis of Basic Indicator Approach.</li> </ul>

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Capital Adequacy (co	ntinued)
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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. on quarterly rest. 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. As of 31 December 2018, Bank maintained total capital (CET 1 and Tier 2) of Taka 7,841.83 million against the minimum requirement including capital conservation buffer of Taka 5,863.94 million with a surplus of Taka 1,977.89 million. Bank's capital to risk-weighted asset ratio (CRAR) as of 31 December 2018 stood at 15.88% (consisting of 14.92% in CET 1 capital and 0.96% in Tier 2 capital) against the regulatory requirement of minimum including capital conservation buffer 11.875%. This surplus capital both in term of absolute amount and ratio (CRAR) is considered to be adequate to absorb all the material risks to which the Bank may be exposed in future. The Bank maintained more than adequate capital against the regulatory requirement to upheld and strengthen the confidence of its investors, depositors and other stakeholders	
depositors and other stakeholders.	

#### **Quantitative Disclosures**

b)	Capital Requirement for			In million Taka
	Credit Risk	Particulars	Risk Weighted Assets (RWA)	Minimum Capital Requirement (MCR)
		Credit Risk	2 	
		On-balance sheet	36,278.74	3,627.87
		Off-balance sheet	4,135.22	413.52
		Total	40,413.96	4,041.39
c)	Capital Requirement for			In million Taka
	Market Risk	Particulars	Risk Weighted Assets (RWA) Capital Charge	Minimum Capital Requirement (MCR)
		Market Risk		
		Interest rate related instruments	4,837.00	483.70
		Equities	-	-
		Foreign exchange position	355.64	35.56
		Commodities	-	-
		Total	5,192.64	519.26
d)	Capital Requirement for			In million Taka
	Operational Risk	Particulars	Risk Weighted Assets (RWA)	Minimum Capital Requirement (MCR)
		Operational Risk	3,773.97	377.40
	1	Total	3,773.97	377.40

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#### **Capital Adequacy (continued)**

e)	Total Risk Weighted Assets (RWA), Total Minimum	Particulars	n million Tak
	Capital Requirement (MCR)	Total Risk Weighted Assets (RWA)	Amount
	and Total Eligible	Credit Risk	
	Regulatory Capital	On-balance sheet	36,278.74
	Regulatory Supriar	Off-balance sheet	
			4,135.22
		Total Credit Risk [i]	40,413.96
		Market Risk [ii]	5,192.64
		Operational Risk [iii]	3,773.97
		Total Risk Weighted Assets (RWA) [i+ii+iii]	49,380.57
		Total Minimum Capital Requirement (MCR)	
		Credit Risk	
		On-balance sheet	3,627.87
		Off-balance sheet	413.52
		Total Credit Risk [i]	4,041.39
		Market Risk [ii]	519.26
		Operational Risk [iii]	377.40
		Total Minimum Capital Requirement (MCR)	4,938.05
		Total Eligible Regulatory Capital	
			.L
f)	Total capital, CET1 capital,		a de dat dat e
	Total Tier 1 capital and Tier	Particulars	Ratio (%)
	2 capital ratio:	Total Capital to Risk-weighted Assets Ratio (CRAR)	15.88%
		Common Equity Tier 1 Capital to Risk-weighted Assets Ratio	14.92%
		Total Tier 1 Capital to Risk-weighted Asset Ratio	14.92%
		Tier 2 Capital to Risk-weighted Asset Ratio	0.96%
g)	Capital Conservation Buffer		n million Ta
5/		Particulars	Amount
		Risk Weighted Assets [A]	49,380.57
		Rate of Capital Conservation Buffer for 2018 in percentage [B]	1.875%
		Amount of Common Equity Tier 1 (CET 1) Capital is	025.00
		required as per Capital Conservation Buffer [C = A x B]	925.88
L- )	Available Capital under		n million Ta
h)	Pillar 2 Requirement	Particulars	Amount
h)	Fillar 2 Requirement		1 7 0 / 1 0
h)		Total Eligible Regulatory Capital [A]	
h)		Minimum Capital Requirement under Pillar 1 [B]	7,841.83
h)		Minimum Capital Requirement under Pillar 1 [B] Capital Conservation Buffer [C]	4,938.00
h)		Minimum Capital Requirement under Pillar 1 [B]	



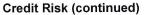
### সাউথ বাংলা এগ্রিকালচার এ্যান্ড কমার্স ব্যাংক লিঃ Credit Risk

1)	The general qualitative	ve disclosure requirement with respect to credit risk, including:
	(i) Definitions of past due and impaired (for accounting purposes)	As per Bangladesh Bank guidelines, the Bank defines the past due and impaired loans and advances for strengthening the credit discipline and mitigating the credit risk of the Bank. The impaired loans and advances are defined on the basis of (i) Objective / Quantitative Criteria and (ii) Qualitative judgment. For thi 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.
		<ul> <li>Definition of past due/overdue: <ul> <li>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;</li> <li>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;</li> <li>iii) In case of any installment(s) or part of installment(s) of a Fixed Term Loa is not repaid within the fixed expiry date, the amount of unpai installment(s) will be treated as past due/overdue from the following day of the expiry date;</li> <li>iv) The Short-term Agricultural and Micro-Credit if not repaid within the fixe expiry date for repayment will be considered past due/overdue after simonths of the expiry date.</li> </ul> </li> </ul>
		However, 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)", the prior status of becoming the loan int impaired/classified/ non-performing.
		Definition of impaired / classified / non-performing loans and advances an as follows:
		<ul> <li>Continuous loan are classified are as follows:</li> <li>Substandard: If it is past due /overdue for 3 (three) months or beyond b less than 6 (six) months;</li> <li>Doubtful: If it is past due / overdue for 6 (six) months or beyond but lest than 9 (nine) months;</li> <li>Bad / Loss: If is past due / overdue for 9 (nine) months or beyond</li> </ul>
		<ul> <li>Demand loan are classified are as follows:</li> <li>Substandard: If it remains past due / overdue for 3 (three) months beyond but not over 6 (six) months from the date of expiry or claim by the Bank or from the date of creation of forced loan;</li> <li>Doubtful: If it remains past due / overdue for 6 (six) months or beyond be not over 9 (nine) months from the date of expiry or claim by the Bank from the date of creation of forced loan;</li> <li>Bad / Loss: If it remains past due / overdue for 9 (nine) months or beyond from the date of expiry or claim by the Bank or from the date of expiry or claim by the Bank from the date of expiry or claim by the Bank from the date of expiry or claim by the Bank or from the date of expiry or clai</li></ul>
	2 20,	<ul> <li>Fixed Term Loans are classified are as follows:</li> <li>a) In case of any installment(s) or part of installment(s) of a Fixed Term Loa amounting upto Taka 10 lacs is not repaid within the due date, the classification is as under:</li> <li>Substandard: If the amount of past due installment is equal to or mothan the amount of installment (s) due within 6 (six) months, the entire load will be classified as 'Sub-standard';</li> </ul>

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	amount classifie • Bad / L the am will be b) In case of amounting classificati • Substa than th loan wi • Doubti amoun classifi • Bad / L the am	t of install ed as 'Do Loss: If th ount of in classified f any insi- g more th ion is as u andard : andard : te amoun II be class ful: If the t of install ed as 'Do Loss: If th ount of ir sified as <b>Agricultu</b> will be o the loan fied as 'S 36 month	ne amount stallment i as 'Bad/Li tallment(s) nan Taka under: If the amount of install sified as 'S amount of lment (s) ubtful'; he amount stallment( 'Bad/Loss ural and considered agreemen ub-standa s and as	due withi of past (s) due vo oss'; or part 10 lacs ount of p ment (s) ount of p ment (s) ount of p sub- star past du due with t of past s) due v <b>Micro-C</b> d irregul t. If the rd' after 'Bad/Los	in 9 (nin due ins within 12 of insta is not oast due ) due w ndard'; le install nin 6 (si due ins vithin 9 <b>Credit:</b> a r if no said irre a perior ss' after	e) mon stallmer 2 (twelv allment repaid e instal ithin 3 ment is x) mon stallmer (nine) r The SI ot repai egular s d of 12	ths, the ei ths, the ei the months (s) of a F (within the (three) me the equal to the equal to the the ei the the ei the the ei the the either the the either the eit	ntire loan to or mo s, the enti ixed Terr e due da equal to c onths, the or more t ntire loan to or mo e entire l Agricultu he due o tinues, th as 'Doubtf	will be re than ire loan m Loan ate, the or more e entire han the will be ore than oan will ral and date as e credit ful' after
<ul> <li>Description of approaches followed for specific and general allowances and statistical methods</li> </ul>	b) Calcul the fo i. Out	specific the uncla ation of nding am ation of llowing to	allowance ssified an base for ount less	es for lo d classif <b>provis</b> suspend provisio nts:	ans and ied loan iion for led inter n for th	d advai s are ca r uncla est, if a e class	nces. Firs alculated a ssified /s ny; sified loar	tly, the b as under: standard ns, the hi	oase for loans: gher of
	or ii. 15% Secondly, th of general ar	e followin		e applied		se for p	rovision fo	or determi	nation
	Particu	lars	Short Term Agriculture and Micro Credit	Const Other than HF, CC& LP	umer Fina HF	ncing CC &LP	Small Enterprise Financing	Credits to BHs/MBs / SDs	All Other Credits
		Standard	1%	5%	1%	2%	0.25%	2%	1%
	Unclassified	SMA	1%	5%	1%	2%	0.25%	2%	1%
		SS	5%	20%	20%	20%	20%	20%	20%
	Classified	DF	5%	50%	50%	50%	50%	50%	50%
		B/L	100%	100%	100%	100%	100%	100%	100%
		Einersia-		an for Profe	esional	L	SD = Stock	Dealer	
1	HF= Hous BH = Brok	e Financing		erchant Ba			CC = Cred		
				enan Da					

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#### Credit Risk (continued)

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Gre	dit Risk (continued)	
й		Mentionable that, all interest accrued is credited to interest suspense account instead of crediting the same to income account if the loan is classified as sub- standard and doubtful. However, charging of interest is discontinued when the loan is classified as bad/loss. As per BRPD Circular No. 4 dated 29 January 2015, the restructured large loan facilities have been treated as Special Mention Account (SMA) for the purpose of classification. Provision has also been calculated at existing applicable rate of SMA with additional 1%. The income from restructured loan has been accounted for only when it was actually received.
	(iii) Discussion of the bank's credit risk Management policy	<ul> <li>The salient features of the Bank credit risk management policy and procedures are as under:</li> <li>Credit policy approved by the Board: The Board approves the Credit Risk Management Policy of the Bank for ensuring the best practice in credit risk management and maintaining quality of assets. The credit policy/manual has been put in place in compliance with Bangladesh Bank's guidelines on credit risk management and other rules &amp; regulations circulated by BB from time to time. The policy envisages making credit decisions based on sound lending principles and practices supported by reliable and accurate financials, management integrity, industry/ technical analysis, environmental due diligence, industry information of the borrowing entity/ company etc.</li> </ul>
		<ul> <li>Credit approval is delegated properly: 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 warning system.</li> </ul>
		<ul> <li>Independent Credit Risk Management Division: There is an independent Credit Risk Management Division to assess credit risks and suggest the mitigation procedures &amp; techniques while processing the credit proposals by the Credit Division for approval.</li> </ul>
		<ul> <li>Separate Credit Administration Division: A separate credit administration division confirms that perfected security documents are in place before disbursement. The division also monitors borrower's compliance with lending covenants and agreed terms and conditions.</li> </ul>
		<ul> <li>Independent Credit Monitoring &amp; Recovery Division and Management Recovery Committee: An independent and fully dedicated Credit Monitoring &amp; Recovery Division monitors the performance and recovery of loans, identify early signs of delinquencies in portfolio and take corrective measures including legal actions to mitigate risks, improve loan quality and to ensure timely recovery of loans. This division also monitors risk status of loan portfolio and ensures adequate loan loss provision. There is a dedicated and high-level management recovery committee to deal with the problem loans for early and most appropriate settlements.</li> </ul>
		<ul> <li>Credit operations are subject to independent internal Audit: Internal Control &amp; Compliance Division independently verifies and ensures, at least once in a year, compliance with approved lending guidelines, Bangladesh Bank guidelines, operational procedures, adequacy of internal control documentation and overall Credit Risk Management System.</li> </ul>
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#### Credit Risk (continued)

	<ul> <li>Reporting to Board/ Executive Committee: Overall quality, performa adequacy of provision of loan portfolio a Directors/ Executive Committee/ Risk M for information and guidance.</li> <li>Above all, the Risk Management Division Management Division (s) on increasing the specific diversification of credit exposures, s loan portfolio ceiling as stipulated by Ban</li> </ul>	ance, recovery sta are regularly report lanagement Comm is regularly guidin collateral coverag ingle borrower exp gladesh Bank, im	tus, risks status ed to the Board of littee of the Board g the Credit Risk ge, product/sector osures limit, large proving the asse
	quality, conducting credit rating of the borro	owers to minimize	the capital charge
	Adequate provision is maintained against clas Guidelines. Status of loans are regularly rep Management Committee of the Board.		
Quantitative Disclosures	:		L
b) Total gross credit risk exposures broken down by	Major types of credit exposure as per d statements as of 31 December 2018:	isclosures in the	audited financial In million Taka
major types of credi	Particulars	Exposure	Mix (%)
exposures	Overdrafts	16,835.40	33.50%
	Cash Credit	17.053.58	33.93%
	Loans against Trust Receipt	3,716.56	7.39%
	Export Packing Credit	92.98	0.19%
	Payment against Document – Sight L/C	560.92	1.12%
	Time Loans	1,898.29	3.78%
	EDF Loans	784.72	1.56%
	Demand Loans	160.00	0.32%
	Lease Finance	391.05	0.78%
	House Building Finance	616.67	1.23%
	General Term Loans	5,138.30	10.22%
	SME Term Loans	1,220.13	2.43%
	Agriculture Term Loans	118.01	0.23%
	Personal Loans	66.35	0.13%
	Auto Loans	7.00	0.01%
	Credit Card	133.86	0.27%
	Staff Loans	276.00	0.55%
	Other Loans	2.89	0.01%
	Bills Purchased and Discounted	1,182.24	2.35%
	Total	50,254.94	100.00%



# সাউপ ব্যাংল্য এহিকালচুর এ্যান্ড কমার্স ব্যাংক লিঃ

c) Geographical distribution of	Geographical distribution of credit ex audited financial statements as of 31 D	ecember 2018 are as f	ollows:
exposures, broken			In million Ta
down in significant	Particulars	Outstanding Amount	Mix (%)
areas by major	Urban		
types of credit	Dhaka Division	27,554.29	54.83%
exposure	Chattogram Division	6,200.00	12.34%
	Khulna Division	4,430.34	8.81%
	Rajshahi Division	1,699.82	3.38%
	Barishal Division	1,211.20	2.41%
	Sylhet Division	202.64	0.40%
	Rangpur Division	1,291.59	2.57%
	Sub-total (Urban)	42,589.89	84.74%
	Rural		
	Dhaka Division	3,725.69	7.41%
	Chattogram Division	1,350.69	2.69%
	Khulna Division	2,272.37	4.52%
	Rajshahi Division	3.11	0.01%
	Barishal Division	95.35	0.20%
	Sylhet Division	217.85	0.43%
	Rangpur Division	-	- 15.26%
	Sub-Total (Rural)	7,665.05	15.20%
d) Industry or	Grand Total	50,254.94 on of exposures, broke ne disclosures in the	<b>100.00%</b> n down by ma audited finan
counterparty type distribution of		on of exposures, broke ne disclosures in the a	n down by ma audited finan
counterparty type distribution of exposures, broken	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a	on of exposures, broke ne disclosures in the a re as follows:	n down by ma
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th	on of exposures, broke ne disclosures in the a	n down by ma audited finan In million Ta
counterparty type distribution of exposures, broken	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a Particulars	on of exposures, broke ne disclosures in the as follows: Outstanding	n down by ma audited finan In million Ta
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a <b>Particulars</b> Agriculture, Fisheries and Forestry	on of exposures, broke ne disclosures in the ire as follows: Outstanding Amount	n down by ma audited finan In million Ta <b>Mix (%)</b>
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a Particulars Agriculture, Fisheries and Forestry Agro base Processing Industries	on of exposures, broke ne disclosures in the a ire as follows: Outstanding Amount 793.39 2,245.47	n down by ma audited finan In million Ta <b>Mix (%)</b> 1.58%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a <b>Particulars</b> Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing	on of exposures, broke ne disclosures in the a ire as follows: Outstanding Amount 793.39 2,245.47	n down by ma audited finan In million Ta <b>Mix (%)</b> 1.58% 4.47%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a Particulars Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing RMG & Textile Industries	on of exposures, broke ne disclosures in the a ire as follows: Outstanding Amount 793.39 2,245.47 20,410.79	n down by ma audited finan In million Ta Mix (%) 1.58% 4.47% 40.61%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a <b>Particulars</b> Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing RMG & Textile Industries Hospitals, Clinics & Medical Colleges	on of exposures, broke ne disclosures in the ire as follows: Outstanding Amount 793.39 2,245.47 20,410.79 4,374.64 540.81	n down by ma audited finan In million Ta Mix (%) 1.58% 4.47% 40.61% 8.70%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a Particulars Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing RMG & Textile Industries Hospitals, Clinics & Medical Colleges Trade & Commerce	on of exposures, broke ne disclosures in the ire as follows: Outstanding Amount 793.39 2,245.47 20,410.79 4,374.64	n down by ma audited finan In million Ta Mix (%) 1.58% 4.47% 40.61% 8.70% 1.08%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a <b>Particulars</b> Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing RMG & Textile Industries Hospitals, Clinics & Medical Colleges Trade & Commerce Transport and Communications	on of exposures, broke ne disclosures in the ire as follows: Outstanding Amount 793.39 2,245.47 20,410.79 4,374.64 540.81 5,659.23	n down by ma audited finan In million Ta Mix (%) 1.58% 4.47% 40.61% 8.70% 1.08% 11.26%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a <b>Particulars</b> Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing RMG & Textile Industries Hospitals, Clinics & Medical Colleges Trade & Commerce Transport and Communications Rubber & Plastic Industries	on of exposures, broke ne disclosures in the ire as follows: Outstanding Amount 793.39 2,245.47 20,410.79 4,374.64 540.81 5,659.23 426.37	n down by ma audited finan In million Ta Mix (%) 1.58% 4.47% 40.61% 8.70% 1.08% 11.26% 0.85%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a Particulars Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing RMG & Textile Industries Hospitals, Clinics & Medical Colleges Trade & Commerce Transport and Communications Rubber & Plastic Industries Iron, Steel & Aluminum Industries	on of exposures, broke ne disclosures in the ire as follows: Outstanding Amount 793.39 2,245.47 20,410.79 4,374.64 540.81 5,659.23 426.37 1,134.97	n down by ma audited finan In million Ta Mix (%) 1.58% 4.47% 40.61% 8.70% 1.08% 11.26% 0.85% 2.26%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a <b>Particulars</b> Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing RMG & Textile Industries Hospitals, Clinics & Medical Colleges Trade & Commerce Transport and Communications Rubber & Plastic Industries Iron, Steel & Aluminum Industries Printing & Packaging Industries	on of exposures, broke ne disclosures in the ire as follows: Outstanding Amount 793.39 2,245.47 20,410.79 4,374.64 540.81 5,659.23 426.37 1,134.97 1,759.92	n down by ma audited finan In million Ta Mix (%) 1.58% 4.47% 40.61% 8.70% 1.08% 11.26% 0.85% 2.26% 3.50%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a <b>Particulars</b> Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing RMG & Textile Industries Hospitals, Clinics & Medical Colleges Trade & Commerce Transport and Communications Rubber & Plastic Industries Iron, Steel & Aluminum Industries Printing & Packaging Industries Other Manufacturing Industries	on of exposures, broke ne disclosures in the ire as follows: Outstanding Amount 793.39 2,245.47 20,410.79 4,374.64 540.81 5,659.23 426.37 1,134.97 1,759.92 351.44	n down by ma audited finan In million Ta Mix (%) 1.58% 4.47% 40.61% 8.70% 1.08% 11.26% 0.85% 2.26% 3.50% 0.70%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a Particulars Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing RMG & Textile Industries Hospitals, Clinics & Medical Colleges Trade & Commerce Transport and Communications Rubber & Plastic Industries Iron, Steel & Aluminum Industries Printing & Packaging Industries Other Manufacturing Industries Housing & Construction Industries	on of exposures, broke ne disclosures in the ire as follows: Outstanding Amount 793.39 2,245.47 20,410.79 4,374.64 540.81 5,659.23 426.37 1,134.97 1,759.92 351.44 8,975.93	n down by ma audited finan In million Ta Mix (%) 1.58% 4.47% 40.61% 8.70% 1.08% 11.26% 0.85% 2.26% 3.50% 0.70% 17.86%
counterparty type distribution of exposures, broken down by major types	Industry or counterparty type distributi types of credit exposures as per th statements as of 31 December 2018 a <b>Particulars</b> Agriculture, Fisheries and Forestry Agro base Processing Industries Small & Medium Enterprise Financing RMG & Textile Industries Hospitals, Clinics & Medical Colleges Trade & Commerce Transport and Communications Rubber & Plastic Industries Iron, Steel & Aluminum Industries Printing & Packaging Industries Other Manufacturing Industries	on of exposures, broke ne disclosures in the ire as follows: Outstanding Amount 793.39 2,245.47 20,410.79 4,374.64 540.81 5,659.23 426.37 1,134.97 1,759.92 351.44 8,975.93 636.43	n down by ma audited finan In million Ta Mix (%) 1.58% 4.47% 40.61% 8.70% 1.08% 11.26% 0.85% 2.26% 3.50% 0.70% 17.86% 1.27%

Disclosure on Risk Based Capital (BASEL III) SBAC Bank Limited BSC Tower, 05<sup>th</sup>-16<sup>th</sup> Floor, 2-3 Rajuk Avenue, Motijheel C/A, Dhaka 1000, Bangladesh, Phone +8802 9577207-11, Fax +8802 9577212, SWIFT SBACBDDH



### Credit Risk (continued)

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e) Residual contractual maturity breakdown of the whole portfolio, broken down by major types of credit exposures		furnished in the audited follows:	maturity of ex I financial stateme			
		Particu	lars	Outsta Amo	-	Mix (%)
		On Demand		5,1	159.48	10.27%
		Within one month	······································	3,6	536.15	7.24%
	Within one to three mo	nths	10,4	150.57	20.79%	
		Within three to twelve	······	17.8	315.75	35.45%
		Within one to five year				21.35%
		More than five years			463.67	4.90%
		Tota	1			L00.00%
f)	Impaired ( classified	a) Amount of impaired				
f)	Impaired / classified loans by major industry or counterparty type:	of 31 December 20				million Tak
		Major Industry / Sector type	clas	ount of imp sified Loans	aired / s	Total
			Substandard	Doubtful	Bad/Loss	070.00
		SMEF	119.85	219.62	338.76	678.23
		Other Than SMEF Total	81.39 <b>201.24</b>	0.37 <b>219.99</b>	231.67 570.43	313.43 991.66
		b) Amount of impaire	ed / classified lo			
		December 2018 wa	ed / classified lo s as under : Status am	oans by ex rount of imp	posure type In aired /	as on 3 million Tak
			ed / classified lo s as under : Status am clas	oans by ex ount of imp sified Loans	posure type In aired /	e as on 3
		December 2018 wa Major Exposure type	ed / classified lo s as under : Status am clas Substandard	oans by ex oount of imp sified Loans Doubtful	posure type In aired / s Bad/Loss	e as on 3 million Tak <b>Total</b>
		December 2018 wa	ed / classified lo s as under : Status am clas	oans by ex ount of imp sified Loans	posure type In aired /	as on 3 million Tak
		December 2018 wa Major Exposure type Continuous Ioan	ed / classified lo s as under : Status am clas Substandard	oans by ex nount of imp sified Loans Doubtful 217.95	posure type In aired / s Bad/Loss 421.19	as on 3 million Tak Total 823.98
		December 2018 wa Major Exposure type Continuous Ioan Demand Ioan	ed / classified lo s as under : Status am clas Substandard 184.84 -	oans by ex oount of imp sified Loans Doubtful 217.95 1.21	posure type In aired / s Bad/Loss 421.19 83.32	e as on 3 million Tak Total 823.98 84.53
g)	Specific and General Provision	December 2018 wa Major Exposure type Continuous loan Demand loan Term loan	ed / classified lo s as under : Status am clas Substandard 184.84 - 16.40 201.24 ral provision for loa exposures of th	oans by ex oount of imp sified Loans Doubtful 217.95 1.21 0.82 219.98 ans portfolio a ne Bank as	posure type In aired / 5 Bad/Loss 421.19 83.32 65.93 570.44 and general s per audit er :	e as on 3 million Tak Total 823.98 84.53 83.15 991.66 provision fo ed financia
g)		December 2018 wa         Major Exposure type         Continuous loan         Demand loan         Term loan         Total	ed / classified lo s as under : Status am clas Substandard 184.84 - 16.40 201.24 ral provision for loa exposures of th December 2018	oans by ex oount of imp sified Loans Doubtful 217.95 1.21 0.82 219.98 ans portfolio a ne Bank as	posure type ln aired / Bad/Loss 421.19 83.32 65.93 570.44 and general s per audit er : In	e as on 3 million Tak Total 823.98 84.53 83.15 991.66 provision fo ed financia million Tak
g)		December 2018 wa         Major Exposure type         Continuous loan         Demand loan         Term loan         Total         a) Specific and Gene Specific and genera off-balance sheet statements as of 31	ed / classified loss as under : Status am clas Substandard 184.84 - 16.40 201.24 ral provision for loa exposures of th December 2018 Particulars	oans by ex ount of imp sified Loans Doubtful 217.95 1.21 0.82 219.98 ans portfolio a ne Bank as was as unde	posure type ln aired / Bad/Loss 421.19 83.32 65.93 570.44 and general s per audit er : In	e as on 3 million Tak Total 823.98 84.53 83.15 991.66 provision fo ed financia million Tak mount
g)		December 2018 wa         Major Exposure         type         Continuous loan         Demand loan         Term loan         Total         a) Specific and Genera         Specific and genera         off-balance sheet         statements as of 31         General provision for	ed / classified lo s as under : Status am clas Substandard 184.84 - 16.40 201.24 ral provision for loa exposures of th December 2018 Particulars oans and advance	oans by ex ount of imp sified Loans Doubtful 217.95 1.21 0.82 219.98 ans portfolio a ne Bank as was as unde	posure type ln aired / Bad/Loss 421.19 83.32 65.93 570.44 and general s per audit er : In	e as on 3 million Tak Total 823.98 84.53 83.15 991.66 provision fo ed financia million Tak
g)		December 2018 wa         Major Exposure type         Continuous loan         Demand loan         Term loan         Total         a) Specific and Gene Specific and genera off-balance sheet statements as of 31	ed / classified lo s as under : Status am clas Substandard 184.84 - 16.40 201.24 ral provision for loa exposures of th December 2018 Particulars oans and advanc oans and advanc	ans by ex <b>Dount of imp</b> <b>sified Loans</b> <b>Doubtful</b> 217.95 1.21 0.82 <b>219.98</b> ans portfolio and	posure type ln aired / Bad/Loss 421.19 83.32 65.93 570.44 and general s per audit er : In	e as on 3 million Tak Total 823.98 84.53 83.15 991.66 provision fo ed financia million Tak mount 358.85
g)		December 2018 wa         Major Exposure         type         Continuous loan         Demand loan         Term loan         Total         a) Specific and General off-balance sheet statements as of 31         General provision for Specific provision for logical	ed / classified lo s as under : Status am clas Substandard 184.84 - 16.40 201.24 ral provision for loa exposures of th December 2018 Particulars oans and advanc oans and advanc	ans by ex <b>Dount of imp</b> <b>sified Loans</b> <b>Doubtful</b> 217.95 1.21 0.82 <b>219.98</b> ans portfolio and	posure type ln aired / Bad/Loss 421.19 83.32 65.93 570.44 and general s per audit er : In	e as on 3 million Tak Total 823.98 84.53 83.15 991.66 provision fo ed financia million Tak mount 358.85 516.58

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#### Credit Risk (continued)

		b) Charges for Specific and General Provision during the period : Specific and general provision for loans portfolio and general provis off-balance sheet exposures of the Bank charged during the year a audited financial statements for the year ended 31 December 201 as under :			
			In million Taka		
		Particulars	Amount		
		General provision for loans and advances	(39.23)		
		Specific provision for loans and advances	433.67		
		General provision for off-balance sheet exposures	(6.82)		
		Total	387.62		
h)	Gross Non Performing Assets (NPAs)	Position of Non-Performing Loans and Advances including and discounted of the Bank as per audited financial statem ended 31 December 2018 was as under :			
11)	-	and discounted of the Bank as per audited financial statem ended 31 December 2018 was as under : Particulars Gross Non-Performing Assets (NPAs)	nents for the year In million Taka Amount 991.66		
11)	-	and discounted of the Bank as per audited financial statem ended 31 December 2018 was as under : Particulars	nents for the year In million Taka Amount		
11)	-	and discounted of the Bank as per audited financial statem ended 31 December 2018 was as under : Particulars Gross Non-Performing Assets (NPAs) Non-Performing Assets (NPAs) to Outstanding Loans	nents for the year In million Taka Amount 991.66		
,	-	and discounted of the Bank as per audited financial statem ended 31 December 2018 was as under : Particulars Gross Non-Performing Assets (NPAs) Non-Performing Assets (NPAs) to Outstanding Loans and Advances	nents for the year In million Taka Amount 991.66		
11)	-	and discounted of the Bank as per audited financial statemended 31 December 2018 was as under :           Particulars           Gross Non-Performing Assets (NPAs)           Non-Performing Assets (NPAs) to Outstanding Loans and Advances           Movement of Non-Performing Assets (NPAs)           Opening Balance           Additions / adjustment during the year (net)	nents for the year In million Taka <b>Amount</b> 991.66 1.97% 375.25 616.41		
11)	-	and discounted of the Bank as per audited financial statemended 31 December 2018 was as under :           Particulars           Gross Non-Performing Assets (NPAs)           Non-Performing Assets (NPAs) to Outstanding Loans and Advances           Movement of Non-Performing Assets (NPAs)           Opening Balance           Additions / adjustment during the year (net)           Closing balance	In million Taka Amount 991.66 1.97% 375.25		
	-	and discounted of the Bank as per audited financial statemended 31 December 2018 was as under :           Particulars           Gross Non-Performing Assets (NPAs)           Non-Performing Assets (NPAs) to Outstanding Loans and Advances           Movement of Non-Performing Assets (NPAs)           Opening Balance           Additions / adjustment during the year (net)           Closing balance           Movement of specific provision for NPAs	nents for the year In million Taka Amount 991.66 1.97% 375.25 616.41 <b>991.66</b>		
11)	-	and discounted of the Bank as per audited financial statemended 31 December 2018 was as under :           Particulars           Gross Non-Performing Assets (NPAs)           Non-Performing Assets (NPAs) to Outstanding Loans and Advances           Movement of Non-Performing Assets (NPAs)           Opening Balance           Additions / adjustment during the year (net)           Closing balance           Movement of specific provision for NPAs           Opening balance	nents for the year In million Taka <b>Amount</b> 991.66 1.97% <u>375.25</u> 616.41 <b>991.66</b> 82.91		
	-	and discounted of the Bank as per audited financial statem ended 31 December 2018 was as under : Particulars Gross Non-Performing Assets (NPAs) Non-Performing Assets (NPAs) to Outstanding Loans and Advances Movement of Non-Performing Assets (NPAs) Opening Balance Additions / adjustment during the year (net) Closing balance Movement of specific provision for NPAs Opening balance Add : provision made during the year	nents for the year In million Taka Amount 991.66 1.97% 375.25 616.41 <b>991.66</b>		
	-	and discounted of the Bank as per audited financial statem ended 31 December 2018 was as under : Particulars Gross Non-Performing Assets (NPAs) Non-Performing Assets (NPAs) to Outstanding Loans and Advances Movement of Non-Performing Assets (NPAs) Opening Balance Additions / adjustment during the year (net) Closing balance Movement of specific provision for NPAs Opening balance Add : provision made during the year Less : Write-off	nents for the year In million Taka <b>Amount</b> 991.66 1.97% 375.25 616.41 <b>991.66</b> 82.91		
11)	-	and discounted of the Bank as per audited financial statem ended 31 December 2018 was as under : Particulars Gross Non-Performing Assets (NPAs) Non-Performing Assets (NPAs) to Outstanding Loans and Advances Movement of Non-Performing Assets (NPAs) Opening Balance Additions / adjustment during the year (net) Closing balance Movement of specific provision for NPAs Opening balance Add : provision made during the year	nents for the year In million Taka <b>Amount</b> 991.66 1.97% 375.25 616.41 <b>991.66</b> 82.91		



#### **Equities: Disclosures for Banking Book Positions**

Qua	alitative Disclosures:				
a)	The general qualitative disclosures requirement with respect to equity risk, including :				
	Differentiation between Holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons; and	Not applicable			
	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.	Quoted shares are valued at cost. Provisions are made for any loss arising from diminution in value of investment.			
Qua	antitative Disclosures:				
b)	Value disclosed in the balance sheet on 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.	Not Applicable			
c)	The cumulative realized gains (losses) arising from sales and liquidations in the reporting (31 December 2018) period.	Nil			
d)	<ul> <li>Total unrealized gains (losses)</li> </ul>	Nil			
	Total latent revaluation gains (losses)	Nil			
	<ul> <li>Any amounts of the above included in Tier II capital.</li> </ul>	No			
e)	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	Nil			
	provisions regarding regulatory capital requirements.				

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#### Interest Rate Risk in Banking Book (IRRBB)

Qu	alitative Disclosure:	
a)	The general qualitative	Interest rate risk is the potential impact on the Bank's earnings (Net
	disclosure requirement including	Interest Income- NII) and net asset values due to changes in market
	the nature of IRRBB and key	interest rates. Interest rate risk arises when the Bank's principal and
	assumptions, including assumptions regarding loan	interest cash flows (including final maturities), for both On and Off- balance sheet exposures, have mismatched re-pricing dates. The
	prepayments and behavior of	amount at risk is a function of the magnitude and direction of interest
	non-maturity deposits, and	rate changes and the size and maturity structure of the mismatch
	frequency of IRRBB	position. The portfolio of assets and liabilities in the banking book
	measurement.	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 sensitive
		liability portfolio) for 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;
		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. However, the behavior of withdrawal of
		non-maturity deposits of the Bank is more or less stable.
		The Bank measures the IRRBB as per the regulatory guidelines on a
		quarterly rest.

#### Quantitative Disclosures:

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b) The impact of changes in interest rate for On-balance sheet rate sensitive assets and liabilities of the Bank as per the audited financial statements as of 31 December 2018 is furnished below:

	Residual Maturity Bucket					
Particulars	1 month	3 month	6 month	1 year	1 year above	
Rate Sensitive Assets [A]	20,733.20	9,502.10	9,038.20	12,206.30	12,926.50	
Rate Sensitive Liabilities [B]	4,512.90	13,784.40	6,041.90	14,185.70	15,181.30	
GAP [A – B]	16,220.30	-4,282.30	2,996.30	-1,979.40	-2,254.80	
Cumulative GAP	16,220.30	11,938.00	14,934.30	12,954.90	10,700.10	
Interest Rate Change (IRC) [Note 1]	1%	1%	1%	1%	1%	
Quarterly Earnings Impact [GAP X IRC]	162.20	-42.82	29.96	-19.79	-22.55	
Cumulative Earnings Impact	162.20	119.38	149.34	129.55	107.00	
Note 1: Assuming 1% rise in intere						

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#### Market Risk

Qualitative Disclosures:	The Decad				
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 ri	sk covers the following	and lidue related		
	balance sheet:				
	i) Interest rate risk;				
	ii) Equity price risk;				
	iii) Foreign exchange risk; and				
	iv) Commodity price risk				
Methods used to measure Market risk:	approach has been used	to measure the m	arket risk for capita		
	requirement for of the Ba	nk. The total capi	tal requirement i		
	respect of market risk calculated for each of	the risk sub-catego	ories. For each ris		
	category minimum capital				
	separately calculate capital Market Risk" as under :				
	Component of Market	Capital Charged			
	Risk	General Market Risk	Specific Market Risk		
	Interest Rate Risk	Applied	Applied		
	Equity Price Risk	Applied	Applied		
	Foreign Exchange Risk	Арр			
	Commodities Price Risk	Арр			
	covering liquidity, interest oversight from Assets-Lia comprising senior execut the Managing Director. AL The Risk Management I parameters on monthly	ability Management lives of the Bank. .CO meet at least one Division also review basis and recomn	Committee (ALCO ALCO is chaired by ce in a month. /s the market risl		
Policies and processes for mitigating	concentration for containing	g the RVVA.	atia linuial ana ta t		
market risk	There are approved limits total assets ratio, maturity balance sheet and off-ba- money market and foreign e and enforced on a regular b exchange rate committee of review the prevailing mark exchange position, and the risks.	r mismatch, commitm alance sheet items exchange position. The pasis to protect agains of the bank meets o	nents for both on and borrowing from limits are monitored st market risks. The n a daily basis to ange rate, foreigr		
Quantitative Disclosures:		-			
The capital requirements for market			In million Taka		
risk	Particu	lars	Amount		
	Interest Rate Risk		483.70		
	Equity Position Risk				
	Foreign Exchange Risk		35.56		
	Commodity Risk Total Capital Requirement of Market Risk 51				
	Total Capital Demuine	t of Market Diele	519.26		

Disclosure on Risk Based Capital (BASEL III) SBAC Bank Limited



#### **Operational Risk**

QualitativeDisclosures	
i) Views of Board of Directors (BOD) on system to reduce Operational Risk	The policy for operational risks including internal control and compliance risk is approved by the Board taking into account 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 risk. As a part of continued surveillance, the management committee (MANCOM), Risk Management Committee (at the management level), independent Risk Management Division regularly reviews different aspects of operational risk. The analytical assessment was reported to the Board/ Risk Management Committee/Audit Committee of the Bank for review and formulating appropriate policies, tools & techniques for mitigation of operational risk.
ii) Performance gap of executives and staffs	The Bank has a policy to provide competitive package and best working environment to attract and retain the most talented people available in the industry. The Bank's strong brand image plays an important role in employee motivation. As a result, there is no significant performance gap.
iii) Potential external events	Like other peers, the Bank operates its business with few external risk factors relating to the socio-economic condition, political atmosphere, regulatory policy changes, natural disaster etc. based on the overall perspective of the country. Potential external events and related downside risk, namely, political impasse, damage of Bank' s delivery channel including ATM, fear of theft/ robbery in banks vaults, compliance/ adjustment due to changes of regulatory policy stance,
iv) Policies and processes for mitigating operational risk	laws & regulations etc. are managed to keep within tolerable limit. The policy for operational risks including internal control and compliance risk is approved by the Board taking into account relevant guidelines of Bangladesh Bank. A policy guideline on Risk Based Internal Audit (RBIA) System is in operation. As per RBIA, branches with high risk status and subjected to more frequent audit by Internal Control and Compliance Division (IC&CD). IC&CD directly reports to Audit Committee of the Board. Currently, the Bank is using some models or tools for mitigating operational risk such as Self-Assessment of Anti-fraud Internal Control; Quarterly Operational Report (QOR) and Departmental Control Function Check List (DCFCL) in line with the Bangladesh Bank' s relevant Instructions and recommendations. It is required to submit the statement on Self-Assessment of Antifraud Internal Control to
	Bangladesh Bank on quarterly rest. In addition, there is a Vigilance Cell established in 2013 to reinforce the operational risk management of the Bank. 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 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) Approaches for calculating capital charge for operational risk	Circular No. 10. 1. 1.04 D		es on 'Risk Based capital framework in harge for operational of average positive three years. It also r is negative or zero, or and denominator capital charge for blowing formula: or Approach e previous three if any shall be hich gross income is nterest Income" plus sult of : paid to outsourcing	
		g extraordinary or g income derived		
Quantitative Disclosures:		- 1.44		2
The capital requirements for				
operational risk	Taka377.40million.			
Capital Charge for Operational Risk-				ount in million Taka
Basic Indicator Approach	Year	Gross Income (GI)	Average Gross Income (AGI)	Capital Charge = 15% of AGI
	2016	1,820.09	1,224.61	183.69
	2017	2,483.62	1,767.36	265.10
	2018	3,244.23	2,515.98	377.40

Disclosure on Risk Based Capital (BASEL III) SBAC Bank Limited



#### Liquidity Ratio

In line with the provisions of liquidity risk management under Basel III, Bangladesh Bank on the basis of the relevant guideline of Bank for International Settlements (BIS) has identified the (i) Liquidity Coverage Ratio (LCR); (ii) Net Stable Funding Ratio (NSFR); and (iii) Leverage under the purview of 'Liquidity' ratio vide BRPD Circular No. 18 dated 21December 2014 and DOS Circular No. 1 dated 1 January 2015.

(BOD) on system to reduce rest while re Liquidity Risk Report etc. position whi on monthly Upon review	wing the overall liquidity position along with the outlook of the ling need, investment opportunity, market/ industry trend, the es its strategic decision regarding deposits, funding, s, loans as well as interest rates polices etc. The Board always
Board take investments strives to m need for the maintain reg	naintain adequate liquidity to meet up Bank's overall funding e huge retail depositors, borrowers' requirements as well as gulatory requirements comfortably.
<ul> <li>ii) Methods used to measure Liquidity Risk</li> <li>The mainte Liquidity Ra to measure However, u for measurin a) Liqu ensu liquid need</li> <li>b) Net aims times asse items indic equa ASF perco RSF perco liliqui In addition t monitor the manner: a) Asse b) Who c) Maxi Besides the liquidity risk a) Strest</li> </ul>	nance of Cash Reserve Requirement (CRR) and Statutory atio (SLR) are considered as the fundamental methods / tools the liquidity position / risk of the Bank. nder Basel III, the following methods and tools are mandated ing the liquidity risk. <b>idity Coverage Ratio (LCR):</b> Liquidity Coverage Ratio assets that can be converted into cash to meet its liquidity d assets that can be converted into cash to meet its liquidity is (i.e. total net cash outflows) over the next 30 calendar days. <b>Stable Funding Ratio (NSFR):</b> Net Stable Funding Ratio to limit over-reliance on short-term wholesale funding during is of abundant market liquidity and encourage better assment of liquidity risk across all on- and off-balance sheet is. The minimum acceptable value of this ratio is 100 percent, rating that, available stable funding (ASF) should be at least al to required stable funding (RSF). consists of various kinds of liabilities and capital with entage weights attached given their perceived stability. consists of assets and off-balance sheet items, also with entage weights attached given the degree to which they are id or " long-term" and therefore requires stable funding. to the above, the following measures have been put in place to liquidity risk management position of the Bank on a continued et-Liability Maturity Analysis (Liquidity profile); be sale borrowing capacity; imum Cumulative Outflow (MCO); e above, the following tools are also used for measuring

Disclosure on Risk Based Capital (BASEL III) SBAC Bank Limited



### Liquidity Ratio (continued)

iii) Liquidity risk management system	In SBAC Bank Ltd., at the mar managed by the Treasury Divis which is headed by the Ma management.	sion (Front Office) und	er oversight of ALCO
	Treasury Division upon review daily basis sets their strategy position taking into considerati- liquid assets to total assets r	to maintain comfortak on of Bank's approved atio, asset-liability ma	ble/adequate liquidity d credit deposit ratio, turity profile, Bank's
	earning/profitability as well as of Apart from the above, Ris	overall market behavior	and sentiment etc.
	&measures the liquidity risk in I tools, namely, LCR, NSFR, L issues and strategies to mai respective division (s) on regula	ine with the Basel III li everage Ratio. RMD. ntain the Basel III lie	quidity measurement addresses the key
iv) Policies and processes for	The Asset-Liability Manageme	ent Committee (ALCO	
mitigating Liquidity Risk	process & procedures for mitiga ALCO works under specific Tel the Board.	ation of liquidity risk of rms of References (fur	the Bank. nctions) approved by
	Treasury Division (Front Office of Top Management reviews th takes appropriate strategy, pro managing liquidity risk of the Ba	e overall liquidity posi ocess in line with the	tion of the Bank and
Quantitative Disclosures i) Liquidity Coverage Ratio (LCR)	The Liquidity Coverage Ratio (		
	South Bangla Agriculture & Co 2018 was as under: Stock of High quality liquid assets Liquidity Coverage Ratio (LCR) = Net cash outflows over the next 30 cale	endar days*	
	Particulars	Ratio	
	raticulars	Bangladesh Bank Requirement	Bank's Position
	Liquidity Coverage Ratio (LCR)	≥ 100%	349.31%
	<ul> <li>If total weighted cash inflows outflows then, for calculatio outflows over next 30 days over the next 30 calendar day</li> </ul>	on of LCR, 25% of t will be taken instead of	otal weighted cash
ii) Net Stable Funding Ratio (NSFR)	The Net Stable Funding Ratio of South Bangla Agriculture December 2018 was as under: Available amount of stable funding Net Stable Funding Ratio (NSFR) =	& Commerce Bank (ASF)	y Ratios of Basel III Limited as of 31
	Required amount of stable funding		
		Ratio	(%)
<i>x</i>	Particulars		
		Ratio Bangladesh Bank	(%)

Disclosure on Risk Based Capital (BASEL III) SBAC Bank Limited

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#### Liquidity Ratio (continued)

Assets (SHQLA)	<ul> <li>As stipulated by Bangladesh Bank vide DOS Circular Letter No. 1 dated January 2015,the Stock of High Quality Liquid Assets (SHQLA) of South Bangla Agriculture &amp; Commerce Bank Limited as of 31 December 2018 was as under:</li> </ul>		
	Deutioulous	In million Taka	
	Particulars	Amount	
	Cash in hand	546.10	
	Balance with Bangladesh Bank	3,542.29	
	Un-encumbered approved securities	7,030.56	
	Total Stock of High Quality Liquid Assets (SHQLA)	11,118.95	
iv) Total net cash outflows over the next 30 calendar days	As stipulated by Bangladesh Bank vide DOS Circular Lett January 2015, total net cash outflows over the next 30 c South Bangla Agriculture & Commerce Bank Limited position as of 31 December 2018 was as under:	alendar days of based on the	
		In million Taka	
	Particulars	Amount	
	Total weighted cash outflows over next 30 days [A]	12,441.10	
	Total weighted cash inflows over next 30 days [B] Total net cash outflows over next 30 days [A – B]	9,257.97 <b>3,183.13</b>	
v) Available amount of stable funding	As stipulated by Bangladesh Bank vide DOS Circular Lett January 2015, the available amount of stable funding Bangla Agriculture & Commerce Bank Limited as of 31 was as under:	(ASF) of South	
,	January 2015, the available amount of stable funding Bangla Agriculture & Commerce Bank Limited as of 31	(ASF) of South December 2018	
,	January 2015, the available amount of stable funding Bangla Agriculture & Commerce Bank Limited as of 31	(ASF) of South	
,	January 2015, the available amount of stable funding Bangla Agriculture & Commerce Bank Limited as of 31 was as under:	(ASF) of South December 2018 In million Taka Weighted	



# Leverage Ratio Qualitative Disc

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Qualitative Disclosures			
i) Views of BOD on system to reduce excessive leverage	The Board of Directors primarily views on the growth of On and Off balance sheet exposures commensurate with its expected capital growth so that the excessive leverage is reduced. Within the On-balance components, again, the Board emphasizes on the growth of the prime component i.e. the loans and advances and maintaining good asset quality so as to maximize the revenue as well as the capacity to generate capital internally (in the form of retained earnings) to trade-off the excessive leverage supposed to be caused by asset growth. At the outset of asset growth, the Board also views the growth of its sources of fund i.e. deposit growth taking into consideration of projected business growth so that the credit-deposit ratio is maintained at a sustainable basis as well as to reduce the mismatches of asset-liability gap within the tolerable limit to manage the liquidity risk.		
ii) Policies and processes for managing excessive on and off balance sheet leverage	First and foremost, Bank's policy is to maintain the Leverage Ratio (Tier 1 capital as proportion to total adjusted On and Off balance sheet asset) well above the regulatory requirement. To this end, the striking components of balance sheet, namely, the deposits & borrowing, loans &advances, other liquid assets (treasury bills, bonds, fund placements) are analyzed on monthly basis. Measures are taken to contain the growth of overall size of balance sheet (On and Off balance sheet exposures aggregately) considering short term outlook of the industry indicators as well as possible growth of equity(Tier 1 capital) of the Bank on quarterly rest. With regard to managing the excessive leverage, the regulatory stance through the monetary policy initiatives i.e. the scope of expected business potential (growth), estimated money supply, inflation, resulting the estimated overall liquidity of the industry as well as the Bank in		
iii) Approach for calculating exposure/Leverage	particular is also considered. The exposures of balance sheet representing the overall position of the Bank as of the reporting date are calculated and presented in terms of applicable relevant accounting standards, i.e., IASs (BASs), IFRSs (BFRSs), etc. The accounting values of assets and liabilities are also presented and measured at gross. Netting of assets and liabilities are also made where permitted in compliance with the respective accounting standards and the regulatory instruction. For calculating "leverage", the Bank follows the 'Leverage Ratio' approach/method as suggested by Bangladesh Bank.		
Quantitative Disclosures			
i) Leverage Ratio	Leverage Ratio (LR) under Basel III of South Bangla Agriculture & Commerce Bank Limited as of 31 December 2018 was as under: Leverage Ratio (LR) = Total Exposure (after related deductions) Ratio (%)		
	Particulars	Bangladesh Bank Requirement	Bank's Position
*	Liquidity Ratio (LR) > 3% 9.72%		
*			

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### Leverage Ratio (continued)

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ii) On balance sheet exposure	Total On-balance Sheet exposure for calculating Leverage Ratio under Basel III of South Bangla Agriculture & Commerce Bank Limited as of 31 December 2018 was as under: In million Taka			
	Partic	ulare	T	Amount
				70,656.30
		Total On Balance Sheet Assets [A]		
	Total Adjusted On Balance	Less : Total Specific Provision [B] Total Adjusted On Balance Sheet Exposure [A – B]		
	Total Aujusted On Balance	solleet Expo		70,139.72
iii) Off balance sheet exposure	Total Off-balance Sheet exposure for calculating Leverage Ratio under Basel III of South Bangla Agriculture & Commerce Bank Limited as of 31 December 2018 was as under: In million Taka			
	Exposures Types	Notional Amount	Credit Conversion Factor (CCF)	Weighted Amount
	1	2	3	4 = 2 X 3
	Direct credit substitutes	4,244.34	100%	4,244.34
	Short-term self-liquidating trade letters of credit	6,918.65	20%	1,383.73
	Total			5,628.07
iv) Total exposure Bangla Agriculture & Commerce Bank Limited as of 3 was as under:			Ratio under Ba hited as of 31 D	sel III of South ecember 2018 In million Taka
	Particulars			Amount
k.				70,139.72
	Total On Balance Sheet Exposures [A] Total Off Balance Sheet Exposures [B]			5,628.07
	Less : Total Deduction / Regulatory adjustments [c]			-
	Total Adjusted Exposure [A + B – C]			75,767.79
				·



#### Remuneration

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	alitative Disclosures	
a) li	nformation relating to the bodies	that oversee remuneration
i)	Name of the bodies that oversee remuneration	At the management level, primarily the Human Resources Division oversees the 'remuneration' in line with its HR management strategy / policy under direct supervision and guidance of Management Committee (MANCOM) of the Bank.
ii)	Composition of the main body overseeing remuneration	The MANCOM is headed and chaired by the Managing Director of the Bank; along with other members of top executive management (Deputy Managing Directors) and the Heads of different functional divisions of Head Office. The Company Secretary of the Bank acts as the Member Secretary of the MANCOM.
iii)	Mandate of the main body overseeing remuneration	The mandate of the Management Committee (MANCOM)as the main body for overseeing the Bank's remuneration is to review the position of remuneration and associated matters and recommend to the Board of Directors for approval of its restructuring, rearrangement and modification commensurate with the industry best practices as per requirement.
iv)	External consultants whose advice has been sought, the body by which they were commissioned, and in what areas of the remuneration process.	The Bank has no External Consultant permanently regarding 'remuneration' and its process. However, experts' opinion may have been sought in case to case basis regarding income tax matter, lawyers' opinion for settlement of employees' dues in case of death, penalty etc. if required, by the management.
V)	A description of the scope of the bank's remuneration policy (e.g. by regions, business lines), including the extent to which it is applicable to foreign subsidiaries and branches.	The Bank does not differentiate the 'Pay Structure' and 'employee benefits' by regions. However, variation in remuneration is in practice based on nature of job/business line/activity primarily bifurcated for the employees who are directly recruited by the Bank and the headcounts/employees explored through outsourcing service providers as per rule. As of 31 December 2018, the Bank had no foreign subsidiaries and branches outside Bangladesh.
vi)	A description of the types of employees considered as material risk takers and as senior managers, including the number of employees in each group.	The Bank consider the members of the senior management, branch managers and the employees engaged in different functional divisions at Head Office (except the employees involved in internal control, risk management and compliance) as the material risk takers of the Bank.
b)	Information relating to the design	and structure of remuneration processes
i)	An overview of the key features and objectives of remuneration policy.	Remuneration and other associated matters are guided by the Bank's Service Rule as well as instruction, guidance from the Board from time to time in line with the industry practice with the objectives of retention/hiring of experienced, talented workforce focusing on sustainable growth of the Bank.
ii)	Whether the remuneration committee reviewed the bank's remuneration policy during the past year, and if so, an overview of any changes that were made.	Human Resources Division under guidance of MANCOM, the Board and senior management reviews the issues of remuneration & its associated matters from time to time.
iii)		The risk and compliance employees are carrying out the activities independently as per specific terms of references, job allocated to them. Regarding remuneration of the risk and compliance employees, Humar Resources Division does not make any difference with other mainstream regular employees and sets the remuneration as per the prevailing rule o the Bank primarily governed by the employees' service rule of the Bank.

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#### Remuneration (continued)

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	nuneration (continueu)	
c) [	Description of the ways in which o	current and future risks are taken in account in the remuneration processes
i) ii)	An overview of the key risks that the bank takes into account when implementing remuneration measures. An overview of the nature and	The business risk including credit/default risk, compliance &reputational risk are mostly considered when implementing the remuneration measures for each employee/group of employee. Financial and liquidity risk are also considered. Different set of measures are in practice based on the nature& type of
	type of the key measures used to take account of these risks, including risks difficult to measure.	business lines/segments etc. These measures are primarily focused on the business target/goals set for each area of operation, branch vis-a-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 has been brought to all concerned of the Bank from time to time.
	A discussion of the ways in which these measures affect remuneration.	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.
	A discussion of how the nature and type of these measures has changed over the past year and reasons for the change, as well as the impact of changes on remuneration.	No material change has been made during the year 2018 that could the affect the remuneration.
		h the bank seeks to link performance during a performance measurement
i)	period with levels of remuneratio An overview of main performance metrics for bank, top-level business lines and individuals.	The Board sets the Key Performance Indicators (KPIs) 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.
ii)	A discussion of how amounts of individual remuneration are linked to bank-wide and individual performance.	The remuneration of each employee is paid based on her/his individual performance evaluated as per set criteria. And, accordingly, the aggregate amount of remuneration of the Bank as a whole is linked/impacted to the same extent.
iii)	A discussion of the measures the bank will in general implement to adjust remuneration in the event that performance metrics are weak. This should include the bank's criteria for determining "weak" performance metrics.	The Bank follows remuneration process as per set criteria with no in general adjustment in the event of weak performance metrics/scorecard.

Disclosure on Risk Based Capital (BASEL III) SBAC Bank Limited BSC Tower, 05<sup>th</sup>-16<sup>th</sup> Floor, 2-3 Rajuk Avenue, Motijheel C/A, Dhaka 1000, Bangladesh, Phone +8802 9577207-11, Fax +8802 9577212, SWIFT SBACBDDH



### **Remuneration (continued)**

Remaneration (continued)			
e) Description of the ways in which the bank seek to adjust remuneration to take account of longer-term performance.			
<ul> <li>A discussion of the bank' s policy on deferral and vesting of variable remuneration and, if the fraction of variable remuneration that is deferred differs across employees or groups of employees, a description of the factors that determine the fraction and their relative importance.</li> </ul>	The Bank pays variable remuneration i.e. annual increment based on the yearly performance rating 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 are made provision on aggregate / individual employee basis; actual payment is made upon retirement, resignation etc. as the case may be, as per the Bank's rule.		
ii) A discussion of the bank' s			
policy and criteria for adjusting deferred remuneration before vesting and (if permitted by national law) after vesting through claw back arrangements.	Not Applicable		
<ul> <li>f) Description of the different form these different forms.</li> </ul>	is of variable remuneration that the bank utilises and the rationale for using		
<ul> <li>An overview of the forms of variable remuneration offered (i.e. cash, shares and share- linked instruments and other forms. A description of the elements corresponding to other forms of variable remuneration (if any)should be provided.</li> </ul>	The Bank pays variable remuneration on cash basis (i.e. direct credit to the employee Bank account and / or Payment Order / Cheque), as the case may be, as per rule / practice.		
<ul> <li>A discussion of the use of the different forms of variable remuneration and, if the mix of different forms of variable remuneration differs across employees or groups of employees), a description the factors that determine the mix and their relative importance.</li> </ul>	The following variable remuneration has been offered by the Bank to its employees: <b>Annual Increment</b> Bank provides annual increments based on performance to the employees with the view of medium to long term strategy and adherence to the Bank's values.		
Quantitative Disclosures			
<ul> <li>Number of meetings held by the main body overseeing remuneration during the financial year and remuneration paid to its member.</li> </ul>	There were 6 (six) meetings of the Management Committee (MANCOM) held during the year 2018. All the members of MANCOM are from the core banking area/operation of the Bank. No additional remuneration was paid to the members of the Management Committee for attending the meeting except their regular remuneration.		
<ul> <li>Number of employees having received a variable remuneration award during the financial year.</li> </ul>	Number of Employees having received a variable remuneration award during the year 2018 was : No. of Employees :710 Total Amount : Tk 72.13 million		



#### সাউথ বাংলা এগ্রিকালচার এ্যান্ড কমার্স ব্যাংক লিঃ Remuneration (continued)

nen	functation (continued)			
	iii) Number and total amount of The following number and total amount of Guaranteed bonuses aw guaranteed bonuses awarded during the year 2018:			
	during the financial year.	Particulars	Number of Employees	Total Amount of Guaranteed Bonuses (in million Taka)
		Guaranteed Bonus awarded during the year 2018	767	58.37
,	Number and total amount of sign-on awards made during the financial year.	There was no sign-on awards made in 2018.		
,	Number and total amount of severance payments made during the financial year.	There was no severance payment made during the year 2018.		
	Total amount of outstanding deferred remuneration, split into cash, shares and share- linked instruments and other forms.	There was no deferred remuneration, split into cash, shares and share- linked instruments and other forms made in 2018.		
	Total amount of deferred remuneration paid out in the financial year.	There was deferred remuneration paid out in the financial year 2018.		
viii)	Breakdown of amount of remuneration awards for the	Fixed and variable remuneration paid	l in 2018 are as	In million Taka
	financial year.	Particulars		Amount
		Fixed Pay		886.94
		Variable Pay		72.13
		Total Fixed and Variable Pay		959.07
per	antitative information about em formance units) and explicit adju ards) of deferred remuneration a	ployees' exposure to implicit (e.g. fl istments (e.g. claw backs or similar rev nd retained remuneration:	uctuations in th versals or down	ne value of shares of ward revaluations of
ix)	Total amount of outstanding deferred remuneration and retained remuneration exposed to ex post explicit and/or implicit adjustments.	Not Applicable		
x)	Total amount of reductions during the financial year due to ex post explicit adjustments.	Net Applicable		
xi)	Total amount of reductions during the financial year due to ex post implicit adjustments.			