

National Credit and Commerce Bank Limited

Head Office 7-8, Motijheel C/A, Dhaka-1000.

Figure in crore Tk. where applicable

Disclosures on Risk Based Capital (Basel II) as on 31 December 2013

(1) Scope of Application

Qualitative disclosures	(a)	The name of the top corporate entity in the group to which this guidelines applies.	National Credit and Commerce Bank Limited
	(b)	An outline of difference in the basis of consolidation for accounting and regulatory purpose, with a brief description of the entities with in the group (a) that are fully consolidated ; (b) that are given a deduction treatment ; and (c) that are neither consolidated nor deducted (e.g. where the investment is risk weighted).	<p>The Consolidated financial statements of the Bank includes the financial statements of (a) NCC Bank Limited, (b) NCCB Securities and Financial Services Limited (c) NCCB Capital Limited & (d) NCCB Exchange (UK) Limited.</p> <p>A brief description of NCC Bank and its subsidiaries are as under:</p> <p>National Credit and Commerce Bank Limited (NCCBL)</p> <p>National Credit and Commerce Bank Limited is one of the private commercial banks (PCBs) incorporated in Bangladesh as a public limited banking Company under the Companies Act, 1913, subsequently replaced by the Companies Act, 1994 and governed by the Bank Companies Act-1991(amendment up to 2013). It commenced its banking business with 16 (sixteen) branches from May 17, 1993. Presently, the bank has 101 branches all over Bangladesh, and two booths at utara model town, Uttara, Dhaka and Maniknagar, North Golapbagh, Dhaka and the bank has no overseas branches as at 31 December 2013. The bank has 03 (three) subsidiary Companies namely, NCCB Securities and Financial Services Limited (NCCBSFSL), NCCB Capital Limited (NCCBCL) incorporated in Bangladesh & NCCB Exchange (UK) Limited registered with the Registrar of Companies for England and Wales.</p> <p>NCCB Securities and Financial Services Limited (NCCBSFSL)</p> <p>NCCB Securities and Financial Services Limited is a subsidiary company of NCC Bank Limited. The company incorporated as a private limited company on April 04, 2010 with the Registrar of Joint Stock Companies and Firms (RJSC) vide certificate of incorporation no.C-83683/10 dated April 04, 2010 under the Companies, Act-1994. NCCBSFSL commenced its operation from March 07, 2011. The main objective of the company is to act as a full fledged stock broker & stock dealer to execute buy and sell order of its clients and to maintain own portfolio as well as customers portfolio.</p> <p>NCCB Capital Limited (NCCBCL)</p> <p>NCCB Capital Limited (NCCBCL) is also a subsidiary company of NCC Bank Limited. The company incorporated as a private limited company on April 01, 2010 with the Registrar of Joint Stock Companies and Firms (RJSC) vide certificate of incorporation no.C-83649/10 dated April 01, 2010 under the companies, Act-1994. The company is yet to start its operation till date. The main objective of the company is to act as a full fledged merchant banking activities like issue management, underwriting, advisory services.</p> <p>NCCB Exchange (UK) Limited</p> <p>NCCB Exchange (UK) Limited is fully owned subsidiary company of NCC Bank Limited. The company incorporated as a private limited company with the Registrar of Companies for England and Wales under registration no. 7669773 dated June 14, 2011. NCC Bank Limited got permission from Bangladesh Bank vide letter no. BRPD/(M)204/28/2011-123 dated June 13, 2011 for opening a fully owned subsidiary company with two branches at London and Birmingham in UK. NCCB Exchange (UK) Limited obtained money laundering registration on July 28, 2011 issued by HM revenue & customs. The company got registration from financial services authority (FSA) vide reference no PSD/557817 dated October 26, 2011 to carry on payment services activities under the payment services regulations 2009 (PRs).</p>
	(c)	Any restriction, or other major impediments, on transfer of funds or regulatory capital within the group.	The rules and regulations of BRPD of Bangladesh Bank that govern 'Single Borrower exposure limit for the customers are equally applicable for the Bank in financing its own subsidiaries. As per BRPD Circular 05 dated 09 April 2005 is being applied by the Bank in determining maximum amount of finance to the subsidiaries of the Bank. NCCBL has a credit facility to NCCB Securities and Financial Services Limited of Tk.189.08 crore as on 31 December 2013. The bank has no other financing outstanding with its other subsidiary as at 31 December 2013.
	(d)	The aggregate amount of capital deficiencies in all subsidiaries not included in the consolidation that are deducted and the names (s) of such subsidiaries.	As on the reporting date there was no such deficiency.

(2) Capital Structure

Qualitative disclosures	(a)	Summary information on the terms and conditions of the main features of all capital	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.35 dated 29 December 2010 and other relevant instructions given by Bangladesh Bank from time to time. The main features of the capital instruments are as follows:
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	instruments, especially in the case of capital instruments eligible for inclusion in Tier 1 or Tier 2.	<p>Tire 1 capital instruments</p> <p>i) Paid-up share capital: Issued, subscribed and fully paid up share capital of the bank. It represents paid-up capital, right shares as well as bonus shares issued from time to time.</p> <p>ii) Statutory reserve: As per Section 24(1) of the Bank Companies Act, 1991, an amount equivalent to 20% of the profit before taxes for each year of the bank has been transferred to the statutory reserve fund.</p> <p>iii) Minority interest in subsidiaries: The portion of the equity interest of the subsidiaries not owned by the parent company.</p> <p>iv) General reserve: Any reserve created from profit and loss account for fulfilling future purposes.</p> <p>v) Retained earnings: Amount of profit retained with the banking company after meeting up all expenses, provisions and appropriations.</p> <p>Tire 2 capital instruments:</p> <p>i) General provision maintained against unclassified loans and off-balance sheet exposures: As per BB directive, amount of provision maintained against unclassified loans and off-balance sheet exposures as of the reporting date has been considered.</p> <p>ii) Assets revaluation reserves: As per Bangladesh Bank's instruction, 50% of incremental value from the revaluation of Bank's assets has been considered.</p> <p>iii) Revaluation reserve of HTM securities: As per Bangladesh Bank's instruction, up to 50% of revaluation reserve of HTM securities has been considered.</p> <p>iv) Revaluation reserve of HFT securities: As per Bangladesh Bank's instruction, up to 50% of other reserve (revaluation reserves of HFT securities) has been considered.</p>																																				
Quantitative disclosures	(b) The amount of Tier 1 capital, with separate disclosure of :																																					
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(3) Capital Adequacy

Qualitative disclosures	(a) A summary discussion of the bank's approach to assessing the adequacy of its capital to support current and future activities.	<p>The Bank has adopted standardized approach for computation of capital charge for credit risk and market risk and Basic Indicator Approach (BIA) for operational risk.</p> <p>The Bank has maintained capital adequacy ratio on the basis of "Consolidated" and "Solo" are 11.77% and 11.86% respectively as against the total regulatory requirement of 10%. Tier-I capital adequacy ratio for "Consolidated" and "Solo" was 10.78% and 10.87% against the minimum regulatory requirement of 5% . The Bank's policy is to manage and maintain its capital with the objective of maintaining strong capital ratio and high rating. The Bank maintains capital levels that are sufficient to absorb all materials risk. The Bank also ensure that the capital levels comply with regulatory requirements and satisfy the external rating agencies and other stakeholders including depositors. The whole objective of the capital management process in the Bank is to ensure that the Bank remains adequately capitalized at all times.</p>																											
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(4) Credit Risk

Qualitative Disclosures	(a) The general qualitative disclosure requirement with respect to credit risk, including:	
	i) Definition of past due and impaired (for accounting purposes)	The Bank follows Bangladesh Bank circulars and guidelines relating to classification and provisioning to define past due impairment. Following table summarized the objective criteria for loan classification and provisioning as stipulated by the Central Bank vide BRPD circular no. 14 dated 23 September 2012:

Type of facility	Loan classification							
	SMA		Sub-standard		Doubtful		Bad & Loss	
	Over due Period	Provision (%)	Over due Period	Provision (%)	Over due Period	Provision (%)	Over due Period	Provision (%)
Continuous loan:	60 days or more	5%	3 months or more but less than 6 months	20%	6 months or more but less than 9 months	50%	9 months or more	100%
Demand loan	60 days or more	5%	3 months or more but less than 6 months	20%	6 months or more but less than 9 months	50%	9 months or more	100%
Fixed term loan more than Tk.1.00 million	60 days or more	5%	3 months or more but less than 6 months	20%	6 months or more but less than 9 months	50%	9 months or more	100%
Fixed term loan up to Tk.1.00 million	60 days or more	5%	6 months or more but less than 9 months	20%	9 months or more but less than 12 months	50%	12 months or more	100%
Short-term agricultural and micro credit	90 days or more	5%	12 months or more but less than 36 months	5%	36 months or more but less than 60 months	5%	60 months or more	100%

ii) Description of approaches followed for specific and general allowances and statistical methods: Bank maintains specific provision for classified loans and advances and general provision on unclassified loans and advances are measured following Bangladesh Bank prescribed provisioning rates are mentioned below:

General provision:	Rate
Unclassified general loans and advances	1%
Unclassified loans to small and medium enterprises	0.25%
Loans to brokerage houses, merchant banks, stock dealers against shares etc.	2%
Unclassified loans for housing finance and on loans for professionals	2%
Unclassified consumer financing other than housing finance and loans for professionals	5%
Short term agri credit and micro credit	5%
Special Mention Account	5%
Off-balance sheet exposures	1%
Specific provision:	
Sub-standard loans and advances other than short term agri credit and micro credit	20%
Doubtful loans and advances other than short term agri credit and micro credit	50%
Bad/Loss loans and advances	100%
Sub-standard short term agri credit and micro credit	5%
Doubtful loans and advances short term agri credit and micro credit	5%

iii) Discussion of the Bank's credit risk management policy The Board approved the credit policy with due consideration of Bangladesh Bank guidelines to ensure best practice in credit risk management and maintain quality of assets as well. Authorities are properly delegated ensuring check and balance at every stage to credit operation i.e screening , assessing risk, identification, management and mitigation of credit risk as well as monitoring, supervision and recovery of loans with provision for early warning system. There is a separate credit risk management division for dedicated credit risk management, separate credit administration division for ensuring perfection of collateral and credit monitoring and recovery division for monitoring and recovery of past due loans. Internal control & compliance division independently assess quality of loans and compliance status of loans at least once in a year . Adequate provision is maintained against classified loans as per Bangladesh Bank guidelines . Status of loans are regularly reported to the Board /Executive Committee of the Board.

Quantitative Disclosures	(b)	Total gross credit risk exposures broken down by major types of credit exposure	Bank	Consolidated
			Position	Position
		Major types of credit exposure as disclosed in the audited financial statements as on 31 December 2013 are as under:		
			8814.65	9,076.98
		Overdraft	1550.72	1,550.72
		Cash credit	1622.58	1,622.58
		Loan-general	306.08	306.08
		Transport loan	36.67	36.67
		House building loan	147.16	147.16
		Loan against trust receipt	1608.18	1,608.18
		Loan against imported merchandise	10.00	10.00
		Loan against packing credit	15.34	15.34
		Project loan	18.46	18.46
		Lease finance	125.92	125.92

		Payment against document	47.73	47.73
		Consumer finance scheme	0.06	0.06
		Housing loan under B.Bank refinance scheme	3.17	3.17
		Staff loan	70.80	70.80
		Small Business loan	78.77	78.77
		House renovation loan	2.52	2.52
		Personal loan scheme	0.70	0.70
		Term loan (small, medium & large)	1647.91	1,647.91
		Agri credit	165.74	165.74
		Festival loan	5.16	5.16
		Special housing loan	97.27	97.27
		Credit card	45.99	45.99
		Forced loan	205.33	205.33
		Short term loan	332.67	332.67
		Bill purchased & discounted	178.28	178.28
		Capital market exposure	-	262.32
		Other loans	491.42	491.42
(c)	Geographical distribution of exposures, broken down in significant areas by major types of credit exposure	Geographical distribution of credit exposures as per the disclosure in the audited financial statements as of 31 December, 2013 are as follows:		
			8,814.65	9,076.97
		Urban	8,293.72	8,556.04
		Dhaka Division	5,427.49	5,689.81
		Chittagong Division	2,386.13	2,386.13
		Rajshahi Division	91.25	91.25
		Sylhet Division	60.43	60.43
		Khulna Division	60.19	60.19
		Rangpur Division	239.99	239.99
		Barisal Division	28.25	28.25
		Rural	520.93	520.93
		Dhaka Division	138.51	138.51
		Chittagong Division	275.25	275.25
		Rajshahi Division	15.94	15.94
		Sylhet Division	45.70	45.70
		Khulna Division	41.49	41.49
		Rangpur Division	4.05	4.05
		Barisal Division	-	-
(d)	Industry or counterparty types distribution of exposures broken down by major types of credit exposure	Industry or counterparty types distribution of exposures as disclosed in the audited financial statements as on 31 December, 2013 are as under:	Bank	Consolidated
			8,814.65	9,076.97
		I) Advances to allied concerns of Directors of the Bank	16.02	16.02
		II) Advances to Chief Executive and other Senior executives of the Bank	1.90	1.90
		III) Advances to customers' group-wise clients		
		a) Agriculture loans	173.73	173.73
		b) Export financing	398.52	398.52
		c) Import financing	2,180.40	2,180.40
		d) Transport and communication	143.46	143.46
		a) Commercial lending	1,576.21	1,576.21
		c) House building loan	765.80	765.80
		f) Special program loan	655.22	655.22
		g) Staff loans other than chief executive and other senior executives	68.90	68.90
		i) Others including bills purchased and discount	226.01	488.33
		IV) Industrial loans	2,608.47	2,608.47

Quantitative disclosures	(e)	Residual contractual maturity 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 December 31, 2013 are as follows :	Bank Position	Consolidated Position
				8,814.65	9,076.97
		Payable			
		On demand		205.33	467.65
		Up to one month		1,042.48	1,042.48
		Over one month but not more than three months		1,792.81	1,792.81
		Over three months but less than one year		2,946.21	2,946.21
		Over one year but less than five years		1,851.65	1,851.65
		Above five years		976.16	976.16
	(f)	By major industry or counterparty type :	Amount of impaired loans and if available, past due loans, provided separately	436.90	436.90
			Sub-standard	16.80	16.80
			Doubtful	50.49	50.49
			Bad/loss	418.96	418.96
			- Specific and general provisions; and		
			Provision on classified loans and advances	266.34	281.70
			Provision on unclassified loans and advances	66.80	66.80
			Provision on off-balance sheet items	27.46	27.46
			Provision on investment fluctuation in shares	44.11	44.16
			Provision for other assets	2.35	2.35

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

Qualitative disclosures	(a)	The general quantitative disclosure requirement including the nature of IRRBB and key assumptions, including assumptions regarding loan repayments and behaviour of non-maturity deposits, and frequency of IRRBB measurement.	Interest rate risk in the banking book arises from mismatches between the future yield of an assets and their funding cost. The Bank assess interest rate risk in earning perspective which is traditional approach to interest rate risk assessment and obtained by measuring the changes in the Net Interest Income (NII) on Net Interest Margin (NIM) i.e. the difference between total interest income and the total interest expenses. Assets Liability Committee (ALCO) monitors the interest rate movement on a regular basis. Duration Gap analysis is one of the technique by which NCCBL measures interest rate risk in the banking book on a quarterly basis. Duration is the measure of a portfolio's price sensitivity to changes in interest rates.			
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).	Interest Rate Risk-Increase in Interest Rate	Minor level of shock	Moderate level of shock	Major level of shock
			Change in interest rate	1.00%	2.00%	3.00%
			Weighted average yield on assets (%)	12.55%	12.55%	12.55%
			Total assets (market value)	12332.02	12332.02	12332.02
			Duration GAP (year)	0.62	0.62	0.62
			Fall in MVE (on-balance sheet)	68.1	136.2	204.31
			Revised capital	1325.85	1257.75	1189.64
			Revised RWA	11883.43	11883.43	11883.43
			Revised CAR (%)	11.16%	10.58%	10.01%

(7) Market Risk

Qualitative disclosures	(a)	i) Views of BOD on trading/investment activities	The Board approved all policies related to market risk, sets limits and reviews compliance on a regular basis. The object is to provide cost effective funding to finance asset growth and trade related transactions.			
		ii) Method used to measure market risk	Standardized approach has been used to measure market risk. 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 manages market risk covering liquidity, interest rate and foreign exchange risk with oversight from Assets Liability Management Committee (ALCO) comprising senior executives of the Bank. ALCO is chaired by the Managing Director. ALCO meets at least once in a month.			
		iv) Policies and processes for mitigating market risk	There are approved limits for credit deposit Ratio, liquid assets to total assets ratio, maturity mismatch, commitments for both on-balance sheet and off-balance sheet items and borrowing from money market and forex position. The limits are monitored and enforced on a regular basis to protect against market risk. The exchange rate committee of the Bank meets on a daily basis to review the prevailing market condition, exchange rate, forex position and transactions to mitigate foreign exchange risks.			
Quantitative disclosures	(b)	The capital requirement for:		Bank Position	Consolidated Position	
			Interest rate risk	0.19	0.19	
			Equity position risk	25.04	25.17	
			Foreign exchange risk	3.16	3.17	
			Commodity risk	-	-	

(8) Operational Risk

Qualitative disclosures	(a)	i) Views of BOD on system to reduce Operational Risk	The policy for operational risks including internal control & compliance risk is approved by Board taking into account relevant guidelines of Bangladesh Bank. Audit Committee of the Board directly oversee the activities of internal control & Compliance Division (ICCD) for managing operational risk.			
		ii) Performance gap of executives and staffs	NCCBL has policy to provide competitive package and best working environment to attract and retain the most talented people available in the industry. NCCBL's strong brand image plays an important role in employees motivation . As a result, there is no significant performance gap.			
		iii) Potential external events	No potential external events is expected to expose the Bank to significant operational risk.			
		iv) Policies and processes for mitigating operational risk	The policy for operational risks including internal control & compliance risk is approved by Board taking into account relevant guidelines of Bangladesh Bank. The Bank developed a Risk Management Unit and supervisory review Committee for review and managing operation risk as well as evaluating of the adequacy of the capital . Operational risk may arise from error and fraud due to lack of proper internal control and compliance. Management through internal control and compliance division controls operational procedure of the Bank. The ICC then submit their report to the Board Audit Committee (BAC). The BAC reviews the reports, appraise the internal controls failure and take proper step to improve/develop internal control mechanism as well.			
		v) Approach for calculating capital charge for operational risk	The Bank follows Basic Indicator Approach (BIA) for measuring capital charges for operational risk. Under the Basic Indicator Approach (BIA), the capital charge for operational risk is a fixed percentage (denoted by alpha) of average positive annual gross income of the Bank over the past three years.			

Quantitative Disclosures	(b)	The Capital Requirement for Operational Risk		Bank Position	Consolidated Position	
				95.96	101.54	