# Disclosures on Risk Based Capital (Basel III)

BASED ON DECEMBER 31, 2024

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CITIZENS BANK PLC | 76 MOTIJHEEL C/A, DHAKA 1000



#### Pillar 3 Market Discipline

# Disclosures on Risk Based Capital (Basel III) for the year ended December 31, 2024

The purpose of Market discipline in the Revised Capital adequacy Framework is to complement the minimum capital requirements and the supervisory review process. The aim of introducing Market discipline in the revised framework is to establish more transparent and more disciplined financial market so that stakeholders can assess the position of a bank regarding holding of assets and to identify the risks relating to the assets and capital adequacy to meet probable loss of assets.

The Basel III framework sets out minimum capital requirement standards for banks to ensure that banks are adequately capitalized against the risks they face and are able to withstand losses during periods of stress conditions. The framework consists of three pillars:

Pillar 1: sets out the minimum capital requirements for credit, market and operational risk;

**Pillar 2:** covers the review process by banks and supervisors to assess whether banks' Pillar 1 capital is adequate to meet the risk exposures and whether there is any requirement to hold additional capital in respect of any risks not covered by Pillar 1; and

**Pillar 3:** encourages market discipline and transparency through appropriate disclosures on capital adequacy and risk management processes.

In addition to the three pillars noted above, Basel III introduced leverage ratio, and liquidity standards namely liquidity coverage ratio (LCR) and net stable funding ratio (NSFR) which have greater business implications for banks. Under market discipline, Basel III demands more disclosures than that of the previous.

The Bank made the qualitative and quantitative disclosures in detail below in accordance with Pillar III Market Discipline as per Guidelines on Risk Based Capital Adequacy (RBCA) under Basel-III issued by Bangladesh Bank on December 21, 2014.

The following components have been disclosed hereunder as per the requirement of RBCA guidelines under Basel-III issued by Bangladesh Bank:

- a) Scope of Application
- b) Capital Structure
- c) Capital Adequacy
- d) Investment Risk
- e) Equities: Disclosures for Banking Book Positions
- f) Interest Rate Risk in the Banking Book (IRRBB)
- g) Market Risk
- h) Operational Risk
- i) Leverage Ratio
- j) Liquidity Ratio
- k) Remuneration



#### A. SCOPE OF APPLICATION

On	alitative Disclosures	
a)	The name of the top corporate entity in the group to which this guideline applies	The Framework applies to Citizens Bank PLC (CZB) on 'solo' basis as there was no subsidiary as on the reporting date (December 31, 2024).
b)	An outline of differences in the basis of consolidation for accounting and regulatory purposes, with a brief description of the entities within the group (i) that are fully consolidated; (ii) that are given a deduction treatment; and	The Citizens Bank PLC obtained license for operating business in Bangladesh on 15 <sup>th</sup> December 2020. The bank rolled out its commercial operation on 3 <sup>rd</sup> July 2022.  The disclosure made in the following sections has addressed Citizens Bank PLC as a single entity (Solo Basis) as there was no subsidiary as on the reporting date (31st December 2024).
	(iii) that are neither consolidated nor deducted (e.g. where the investment is risk-weighted).	Citizens Bank PLC is commitment bound to ensure good corporate governance along with staying compliant on all regulatory issues; above all good risk management practices shall be the integral part of our organic culture which eventually will pave us the way to carve the distinctive position in the banking industry in the midst of stiffly competitive market scenario and attendant challenges.
c)	Any restrictions, or other major impediments, on transfer of funds or regulatory capital to subsidiaries.	Not applicable for the Bank as there was no subsidiary of the Bank on the reporting date (December 31, 2024).
Qua	antitative Disclosures	
d)	The aggregate amount of surplus capital of insurance subsidiaries (whether deducted or subjected to an alternative method) included in the capital of the consolidated group.	Not Applicable.

#### B. CAPITAL STRUCTURE

**Qualitative Disclosures** 

#### Summary information on the a) The regulatory capital under Basel-III is comprised with i) terms and conditions of the Tier-1 (Going Concern Capital) and ii) Tier-2 (Gone main features of all capital Concern Capital). instruments, especially in the case of capital instruments Tier-1 Capital (Going Concern Capital) has two components eligible for inclusion in CET of Tier 1 Capital which are Common Equity Tier 1 Capital 1, Additional Tier 1 and Additional Tier 1 Capital. It consists of highest quality or Tier 2; capital items which are stable in nature and allows a bank to absorb losses on an ongoing basis.

Common Equity Tier 1 Capital includes paid-up capital, statutory reserve, general reserve and retained earnings etc. and

Additional Tier 1 Capital will include perpetual bond or non-cumulative preference shares etc.

Tier-2 Capital (Gone Concern Capital) lacks some of the characteristics of the going concern capital but also bears loss absorbing capacity to a certain extent. General provision on unclassified loans and advances, Subordinated debt/instruments issued by the Bank that meet the qualifying criteria for Tier 2 capital, Minority interest i.e. Tier-2 issued by consolidated subsidiaries to third parties.

**Quantitative Disclosures** 

b) The amount of Regulatory capital, with separate disclosure of:
CET1 Capital
Additional Tier 1 Capital
Total Tier 1 Capital
Tier 2 Capital

c) Regulatory Adjustments /Deductions from capital

d) Total eligible capital

The amount of Regulatory Capital of Citizens Bank PLC as of 31.12.2024 is noted below:

Amount in Million Tk.

Particulars of Regulatory Capital Solo (2024)

Tier-l capital 4.042.80

Farticulars of Regulatory Capital	5010 (2024)
Tier-l capital	4,042.80
1)Common Equity Tier-1 Capital (CET-1)	4,042.80
Fully Paid-up capital	4,000.00
Non- repayable share premium account	-
Statutory reserve	37.40
General reserve	# <del>#</del>
Retained earnings	5.39
Dividend equalization reserve	41 <del>-</del>
Minority interest in subsidiaries	.=
Regulatory Adjustments	
2) Additional Tier-1 Capital (AT-1)	Ē
3)Total Tier-1 capital (1+2)	4,042.80
Tier-2 capital	82.72
General provision	82.72
Subordinated debt	-
All other preference shares	
Regulatory Adjustments	
4) TotalTier-2 capital	82.72
Total Eligible Capital	4,125.51



#### C. CAPITAL ADEQUACY

#### **Qualitative Disclosures**

a) A summary
discussion of the
bank's approach for
assessing the
adequacy of its
capital to support
current and future
activities

The Bank is presently following Standardized Approach for assessing and mitigating Credit Risk, Standardized Rule Based Approach for quantifying Market Risk and Basic Indicator Approach for Operational Risk to calculate Minimum Capital Requirement (MCR) under Pillar-I of Basel-III framework as per the guidelines of Bangladesh Bank.

Assessing regulatory capital in relation to overall risk exposures of a bank is an integrated and comprehensive process. The Bank focuses on strengthening risk management and control environment rather than increasing capital to coverup weak risk management and control practices. CZB has been generating most of its incremental capital from retained profit to support incremental growth of Risk Weighted Assets (RWA). Besides meeting regulatory capital requirement, the Bank maintains adequate capital to absorb material risks foreseen. Therefore, the Bank's Capital to Risk Weighted Assets Ratio (CRAR) remains consistently within regulatory limit during 2024 (45.56%). To ensure the adequacy of capital to support the future activities, the bank assesses capital requirements periodically considering future business growth. Risk Management Division (RMD) under guidance of the SRP team/ERMC (Executive Risk Management Committee), is taking active measures to identify, quantify, manage and monitor all risks to which the Bank is exposed to.

Quantitative Disclosures	Quant	itative	Disc	osures
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Que	antitative Disclusures
b)	Capital requirement
	for Credit Risk
c)	Capital requirement
12.	for Market Risk
d)	Capital requirement
	for Operational Risk
e)	Total capital, CET1
	capital, Total Tier 1
	capital and Tier 2
	capital ratio:
	• For the
	consolidated group;
	and
	<ul> <li>For stand alone</li> </ul>
f)	Capital
	Conservation

Buffer

, and the second	Amount in Million T
Particulars	Solo 2024
Capital requirement for Credit Risk	802.22
Capital requirement for Market Risk	26.73
Capital requirement for Operational Risk	76.53
Minimum capital requirement (MCR) 10% of Risk Weighted Assets or Tk.5,000.00 million which is higher.	5,000.00*
Total capital maintained	4,125.51
Capital shortfall over MCR	(874.49)
Capital to Risk Weighted Assets Ratio (CRAR)	45.56%
CET-1to Risk Weighted Assets (RWA) ratio	44.65%
Tier-1 Capital to RWA ratio	44.65%
Tier-2 Capital to RWA ratio	0.91%



g)	Available Capital under Pillar 2	Capital Conservation Buffer (2.50% of RWA)	226.37
	Requirement	Capital Conservation Buffer maintained (%)	35.56%
		Available Capital under Pillar 2	-
		Requirement	

<sup>\*</sup> It is noteworthy that Bangladesh Bank have permitted Citizens Bank PLC as per letter BRPD(LS-1)/745(74)/2024-6530 dated July 28, 2024 to maintain a minimum capital of Tk. 4,000.00 million instead of Tk. 5,000.00 million until July 02, 2026.

#### D. CREDIT RISK

#### **Qualitative Disclosures**

- a) The general qualitative disclosure requirement with respect to credit risk, including:
  - Definitions of past due and impaired (for accounting purposes);
  - Description of approaches followed for specific and general allowances and statistical methods;
  - Discussion of the bank's credit risk management policy; and

#### Credit Risk:

Credit risk arises from the potential that a bank's borrower will fail to meet its obligations in accordance with agreed terms. credit risk also refers the risk of negative effects on the financial result and capital of the bank caused by borrower's default on its obligations to the bank.

Generally, credits are the largest and most obvious source of credit risk. However, credit risk could steam from both on-balance sheet and off-balance sheet activities. It may arise from either an inability or an unwillingness to perform in the pre-committed contracted manner. Credit risk comes from a bank dealing with individuals, corporate, banks and financial institutions or a sovereign.

The assessment of credit risk Involves evaluating both the probability of default by the borrower and the exposure or financial impact on the bank in the event of default.

#### Past Due/Over Due:

A claim that has not been paid as of its due date is termed as past due claim. Payment may be for repayment/renewal/rescheduling or as an installment of a loan. Loans will be treated as past due and or overdue in the following cases:

- 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.
- 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.
- In case of any installment(s) or part of installment(s) of a Fixed Term Loan is not repaid within the fixed expiry date, the amount of unpaid installment(s) will be treated as past due/overdue from the following day of the expiry date.



• The Short-term Agricultural and Micro-Credit if not repaid within the fixed expiry date for repayment will be considered past due/overdue after six months of the expiry date.

For loan classification and maintenance of specific and general provision, Bank follows relevant circulars and advices of Bangladesh Bank from time to time. Provisions and interest suspense are separately shown under other liabilities as per first schedule of Bank Company Act 1991 (amendment up to 2018), instead of netting off with loans. The summary of some objective criteria for loan classification and provisioning requirement is as below:

#### Approaches followed for specific and general allowances:

		Consumer Financing		SMEF				
Particul ars	Short Term Agri Credit	Other than HF, LP	HF	LP	Cottage , Micro & Small Enterpr ises	Mediu m Enterpr ises	Loans to BHs/ MBs/ SDs	All other Credit
UC	1.0%	2%	1%	2%	0.25%	0.25%	1%	1%
SMA	1.0%	2%	1%	2%	0.25%	0.25%	1%	1%
SS	5%	20%	20%	20%	5%	20%	20%	20%
DF	5%	50%	50%	50%	20%	50%	50%	50%
B/L	100%	100%	100%	100%	100%	100%	100%	100%

NB: CF=CONSUMER FINANCING, HF=HOUSING FINANCE, LP=LOANS FOR PROFESSIONALS TO SET UP BUSINESS, UC=UNCLASSIFIED, SMA=SPECIAL MENTION ACCOUNT, SS=SUBSTANDARD, DF=DOUBTFUL, B/L=BAD/LOSS, BHs/ MBs,/SDs= LOANS TO BROKERAGE HOUSES/MERCHANT BANKS/STOCK DEALERS.

#### Credit Assessment and Risk Management:

A through credit and risk assessment shall be conducted prior to the granting of credits and at least annually thereafter for all facilities. The results of this assessment to be presented in a credit proposal that originates from relationship manager/account officer and is approved by Head of Credit Division. The relationship manager/account officer shall be the owner of customer relationship and must be held responsible to ensure the accuracy of the credit proposal submitted for approval.

All proposals of credit facilities must be supported by a complete analysis of the proposed credit. A comprehensive and accurate appraisal of the risk in every credit exposure of the bank is mandatory. No proposal can be put up for approval unless there is a complete written analysis.



#### **Approval Process:**

The approval process must reinforce the segregation of Relationship Management/Marketing from the approving authority. The responsibility for preparing the Credit proposal shall attach with the RM within the corporate banking division. Credit proposal shall be recommended for approval by the RM team and forwarded to the approval team within CRM and approved by individual executive. There commendation of the Head of Corporate Banking is required prior to onward recommendation to CRM for approval.

#### **Credit Administration:**

The Credit Administration function is critical in ensuring that proper documentation and approvals are in place prior to the disbursement of credit facilities. For this reason, it is essential that the functions of Credit Administration be strictly segregated from Relationship Management/ Marketing in order to avoid the possibility of controls being compromised or issues not being highlighted at the appropriate level.

#### **Credit Monitoring:**

To minimize credit losses, monitoring procedures and systems should be in place that provides an early indication of the deteriorating financial health of a borrower. The respective officials shall monitor the following exceptions:

- ➤ Past due principal or interest payments, past due trade bills, account excesses, and breach of credit covenants;
- ➤ Credit terms and conditions are monitored, financial statements are received on a regular basis, and any covenant breaches or exceptions are referred to CRM and the RM team for timely follow up;
- Timely corrective action is taken to address findings of any internal, external or regulator inspection /audit.

Qu	amuuaun	ve misci	0801
b)	Total g	gross cr	edit
	risk	exposi	
	broken	down	by
	major		
	credit e	xposure	)

		Amount in Million Tl
Sln.	Major types of loans	2024
1	Cash credit	558.23
2	Loans (General)	5,570.47
3	Overdraft	2,144.08
4	Other Loans	-
	Total	8272.78



(c)	Geographica1				Amount in Million Tk.
	distribution of	Part	iculars	Name of Division	2024
	exposures, broken	Regi	on Based	Dhaka	8,093.36
	down in			Chittagong	150.05
	significant areas by major types of			Rajshahi	-
	credit exposure.			Sylhet	
	orean emposare.			Khulna	X <del></del>
				Mymensingh	29.37
				Rangpur	
				Barisal	-
				Total	8,272.78
		Cour	ntry Based	Domestic	8,272.78
				Overseas	
d)	Industry or				Amount in Million Tk.
	counterparty type	Sln.	Major In	dustry Types	2024
	distribution of			micro credit through NGO	510.50
	exposures, broken	2		ial and trading	1,593.39
	down by major	3	Construct	ion	460.47
	types of credit	4	Cement as	nd ceramic industries	-
	exposure.	5	Chemical	and fertilizer	102.68
		6	Crops, fis	heries and livestock's	<b>=</b>
		7	Electronic	s and electrical goods	29.43
		8	Food and	allied industries	-
		9	Consumer	finance	176.33
		10	Metal and	steel products	654.26
		11	Pharmace	utical industries	389.05
		12	Power and	l fuel	<u> </u>
		13	Rubber an	d plastic industries	973.69
		14	Readymac	le garments industry	166.24
		15	Ship build	ing & breaking industry	r <u>=</u>
		16	Sugar and	edible oil refinery	
		17	Transport	and e-communication	0.53
		18	Textile mi	lls	963.35
		19		ufacturing or extractive industries	1,437.72
		20	Others		815.14
				Total	8,272.78



e)	Residual	Am	ount in Million Tk.
	contractual	Particulars	2024
	maturity	On demand	250.01
	breakdown of the	In not more than 1 month	1,073.76
	whole portfolio,	In more than 1 month but not more than 3 months	918.44
	broken down by	In more than 3 months but not more than 1 year	5,179.25
	major types of	In more than 1 year but not more than 5 years	674.05
	credit exposure.	In more than 5 years	177.27
		Total	8,272.78
f)	By major industry	Major industry type amount of impaired loans:	
	or counterparty		ount in Million Tk.
	type: • Amount of	Sln. Major Industry Types	2024
		1 Agri and micro credit through NGO	? <b>=</b>
	impaired loans and if available,	2 Commercial and trading	\ <del></del>
	past due loans,	3 Construction	##
	provided	4 Cement and ceramic industries	<b>(#</b>
	separately;	5 Chemical and fertilizer	
	• Specific and	6 Crops, fisheries and livestock's	j <del>e</del>
	general	7 Electronics and electrical goods	-
	provisions; and • Charges for	8 Food and allied industries	:=
		9 Consumer finance	=
	specific	10 Metal and steel products	-
	allowances and	11 Pharmaceutical industries	-
	charge-offs	12 Power and fuel	=
	during the period.	13 Rubber and plastic industries	=
		14 Readymade garments industry	<del>=</del> 2
		15 Ship building & breaking industry	<del></del>
		16 Sugar and edible oil refinery	<b>5</b> 78
		17 Transport and e-communication	-
		18 Textile mills	₩(
		19 Other manufacturing or extractive industries	<del>-</del>
	2	20 Others	-
		Total	( <del>-</del>
	G	Gross Non-Performing Assets (NPAs)	ount in Million Tk.
		Particulars	2024
		Gross Non-Performing Assets (NPAs)	2024
		Nonperforming assets to outstanding loans and	
		advances advances	
		Movement of Non-Performing Assets (NPAs):	-
		Opening balance	=:
		Additions/ (Reductions)	
		Closing balance	
		Movement of specific provisions for NPAs:	-
		Opening balance	-



Provision made during the period	-
Write off	
Write back of excess provisions	
Closing balance	=

#### E. EQUITIES: DISCLOSURES FOR BANKING BOOK POSITIONS

#### **Qualitative Disclosures**

- a) The general qualitative disclosure 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
  - 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.

Banking book positions consist of those assets which are bought for holding until they mature. The bank treats unquoted equities as banking book assets. Unquoted equities are not traded in the bourses or in the secondary market, they are shown in the balance sheet at cost price and no revaluation reserve is created against these equities.

Our investment in quoted shares are being monitored and controlled by the Investment Committee, are reflected in accounts through proper methodologies and accounting standards of the local & international.

As per Bangladesh Bank circular (ref: BRPD circular number -14 dated June 25, 2003), the quoted shares are valued as per market price in the stock exchange(s).

Provisions for shares are maintained for unrealized loss (gain net off) arising from diminution in value of investments. Provision for shares against unrealized loss (gain net off) has been made according to DOS circular number-04 dated 24 November 2011 and for mutual funds (closed-end) according to DOS circular letter no-3 dated 12 March 2015 of Bangladesh Bank.

#### **Quantitative Disclosures**

b) Value disclosed in the balance sheet of investments, as well as the fair value of those investments; for quoted securities, a comparison to publicly quoted share values where the share price is materially different from fair value.

c)	The cumulative realized gains
	(losses) arising from sales and
	liquidations in the reporting
	period.

	Amount in Million Tk.		
Particulars	Amount (Solo) 2024		
	Cost Price	Market Pric	
Unquoted Share	_	=	
Quoted Share	68.47	53.27	

	Amount in Million Tk.
Particulars	(Solo) 2024



d)	<ul><li> Total unrealized gains (losses)</li><li> Total latent revaluation</li></ul>	The cumulative realized gains (losses) arising from sales and liquidations in the reporting period	32.00	
	gains (losses)	Total unrealized gains (losses)	15.20	
	• Any amounts of the above	Total latent revaluation gains (losses)	-	
	included in Tier 2 capital.	Any amounts of the above included in Tier 2 capital	-	
e)	Capital requirements broken	Amour	t in Million Tk.	
	down by appropriate equity	Particulars	(Solo) 2024	
	groupings, consistent with the	Unquoted Share	l ma	
	bank's methodology, as well	Quoted Share	10.65	
	as the aggregate amounts and the type of equity investments subject to any supervisory provisions regarding regulatory capital requirements.		ž.	

# F. Interest Rate Risk in the Banking Book (IRRBB)

Qu	alitative Disclosures	
a)	The general qualitative disclosure requirement including the nature of IRRBB and key assumptions, including assumptions regarding loan prepayments and behavior of nonmaturity deposits, and frequency of IRRBB measurement.	Interest rate risk affects the bank's financial condition due to adverse movements in interest rates of interest sensitive assets and liabilities. Interest Rate Risk is managed through use of Gap analysis of rate sensitive assets and liabilities and monitored through prudential limits and stress testing. The IRRBB is monitored in movements/changes on a monthly basis and the impact on Net Interest Income is assessed. Interest rate risk is the risk where changes in market interest rates might adversely affect a bank's financial condition.  Re-pricing risk is often the most apparent source of interest rate risk for a bank and is often gauged by comparing the volume of a bank's assets that mature or re-price within a given time period with the volume of liabilities that do so.
Qu	antitative Disclosures	



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).

#### Gap analysis: Duration Gap

Amount i	n Million Tk
Particulars	2024
Weighted average duration of assets (DA) in years	0.83
Weighted average duration of liabilities (DL) in years	0.41
Duration gap (DA-DL) in years	0.51

Change of market value of equity due to increase in interest rates as of December 31, 2024

		Amount 1	n Million T
Particulars	1%	2%	3%
Fall in Market Value of Equity	-87.99	-175.97	-263.96

Interest Rate Risk in the Banking Book under Simple Sensitivity Analysis:

Particulars	3 months	6 months	1 year	Above 1 year
Interest sensitive assets	6,996.90	1,743.10	3,486.20	788.60
Interest sensitive liabilities	7162.90	1746.00	3491.90	524.50
Net gap	(166.00)	(2.90)	(5.80)	264.00
Cumulative gap	(166.00)	(168.90)	(174.60)	89.40
Interest rate changes	1%	1%	1%	1%
Yearly earnings impact	(1.70)	(0.00)	(0.10)	2.60
Accumulated earnings impact	(1.70)	(1.70)	(1.80)	0.80

#### G. Market Risk

# a) Views of BOD on trading/investment activities Market risk arises due to changes in the market variables such as interest rates, foreign currency exchange rates, equity prices and commodity prices. The financial instruments that are held with trading intent or to hedge against various risks, are purchased to make profit from spreads between the bids and ask price are subject to market risk. CZB is exposed to market risk mostly stemming from Government Treasury Bills and Bonds, foreign currency etc.



Methods used to measure Market risk market risk and the bank uses those methods which deem fit for a particular scenario. For measuring interest risk from earnings perspective, the bank uses maturity gap analysis, duration gap analysis, sensitivity analysis and mark to market (MTM) method and for measuring foreign exchange risk.  CZB uses standardized (Rule Based) method for Calculating capital charge against market risks for minimum capital requirement of the Bank under Basel-III.  Market Risk Management system which includes Asset Liability Risk Management (ALM) and Foreign Exchange Risk Management under the core risk management guidelines.  Policies and processes for mitigating market risk  Policies and processes for mitigating market risk Management and reporting is based on parameters such as Maturity Gap Analysis, Duration Gap Analysis etc. in line with the global best practices.  Risk Management and reporting is based on parameters such as Maturity Gap Analysis, Duration Gap Analysis etc. in line with the global best practices.  Risk Profiles are analyzed and mitigating strategies are suggested by the Asset Liability Committee.  Foreign Exchange Net Open Position (NOP) limits (Day limit / Overnight limit), deal-wise trigger limits, Stop-loss limit, Profit / Loss in respect of cross currency trading are properly monitored and exception reporting is regularly carried out.  Holding equities is monitored regularly so that the investment remains within the limit as set by Bangladesh Bank.  ALCO analyzes market and determines strategies to attain business goals.  Riccapital requirements:  Amount in Million Tk interest rate risk; equity position risk  [Equity position risk]  Foreign exchange risk  Commodity risk  The capital requirements:  Amount in Million Tk interest rate risk  Equity position risk  Foreign e					
Management system  Asset Liability Risk Management (ALM) and Foreign Exchange Risk Management under the core risk management guidelines.  Policies and processes for mitigating market risk  Risk Management and reporting is based on parameters such as Maturity Gap Analysis, Duration Gap Analysis etc. in line with the global best practices.  Risk Profiles are analyzed and mitigating strategies are suggested by the Asset Liability Committee.  Foreign Exchange Net Open Position (NOP) limits (Day limit / Overnight limit), deal-wise trigger limits, Stop-loss limit, Profit / Loss in respect of cross currency trading are properly monitored and exception reporting is regularly carried out.  Holding equities is monitored regularly so that the investment remains within the limit as set by Bangladesh Bank.  ALCO analyzes market and determines strategies to attain business goals.  Reconciliation of foreign currency transactions.  Puantitative Disclosures  The capital requirements:  Amount in Million Tk  Foreign exchange risk  10.46  Equity position risk  Foreign exchange risk  Commodity Risk		pet 2000	those methods which deem fit for a particular interest risk from earnings perspective, to analysis, duration gap analysis, sensitivity a (MTM) method and for measuring foreign of CZB uses standardized (Rule Based) method against market risks for minimum cap	alar scenario. For measuring the bank uses maturity gap analysis and mark to market exchange risk.	
processes for mitigating market risk  Maturity Gap Analysis, Duration Gap Analysis etc. in line with the global best practices.  Risk Profiles are analyzed and mitigating strategies are suggested by the Asset Liability Committee.  Foreign Exchange Net Open Position (NOP) limits (Day limit / Overnight limit), deal-wise trigger limits, Stop-loss limit, Profit / Loss in respect of cross currency trading are properly monitored and exception reporting is regularly carried out.  Holding equities is monitored regularly so that the investment remains within the limit as set by Bangladesh Bank.  ALCO analyzes market and determines strategies to attain business goals.  Reconciliation of foreign currency transactions.  Particulars  Amount in Million Tk  Particulars  Interest rate risk; equity position risk; foreign exchange risk  Foreign exchange risk  Commodity Risk		Management	Asset Liability Risk Management (ALM) and Foreign Exchange Risk		
b) The capital requirements:  requirements for: interest rate risk; equity position risk; foreign exchange risk; and  Commodity Risk  The capital requirements:  Amount in Million Tk  2024  Interest rate risk 10.46  Equity position risk 10.65  Foreign exchange risk Commodity Risk  -		processes for mitigating market risk	<ul> <li>Maturity Gap Analysis, Duration Gap Analysis etc. in line with the global best practices.</li> <li>Risk Profiles are analyzed and mitigating strategies are suggested by the Asset Liability Committee.</li> <li>Foreign Exchange Net Open Position (NOP) limits (Day limit / Overnight limit), deal-wise trigger limits, Stop-loss limit, Profit / Loss in respect of cross currency trading are properly monitored and exception reporting is regularly carried out.</li> <li>Holding equities is monitored regularly so that the investment remains within the limit as set by Bangladesh Bank.</li> <li>ALCO analyzes market and determines strategies to attain business goals.</li> </ul>		
requirements for: interest rate risk; equity position risk; foreign exchange risk; and  Commodity Risk  Amount in Million Tk  2024  Interest rate risk Equity position risk 10.46  Equity position risk 10.65  Foreign exchange risk Commodity Risk  -					
interest rate risk; equity position risk; Interest rate risk 10.46  Foreign exchange risk; and Commodity Risk 2024  Interest rate risk 10.46  Equity position risk 10.65  Foreign exchange risk 5.62  Commodity Risk -	b)	-	The capital requirements:	A	
equity position risk; foreign exchange risk; and  Commodity Risk  Interest rate risk Equity position risk 10.46  Equity position risk 10.65  Foreign exchange risk 5.62  Commodity Risk		•	Particulars	1	
risk; Equity position risk 10.65 foreign exchange risk; and Commodity Risk 5.62					
foreign exchange risk; and Commodity Risk 5.62  Commodity Risk -			2000000 110000 1100 0 1		
risk; and Commodity Risk -					
Common 1!t! 1.				-	
		Commodity risk		26.73	

# H. OPERATIONAL RISK

Qua	litative Disclosures	
a)	Views of BOD on system to reduce Operational Risk	Operational risk is the risk which may arise directly or indirectly due to failure or breakdown of system, people and process. This definition includes legal risk, but excludes strategic and reputation risk. The Bank manages these risks through a control-based environment in which



	processes are documented, authorization is kept independent and transactions are reconciled and monitored. This is supported by a periodic process conducted by ICCD and monitoring external operational risk events, which ensure that the Bank stays in line with the international best practices.
Performance gap of executives and staffs	CZB is an equal opportunity employer. It recognizes the importance of having the right people at right positions to achieve organizational goals. Our recruitment and selection are governed by the philosophy of fairness, transparency and diversity.
	The bank believes that training and knowledge sharing is the best way to reduce knowledge gap. Therefore, it arranges trainings on a regular basis for its employees to develop their expertise. The bank offers competitive pay package to its employees based on performance and merit. It always tries to develop a culture where all employees can apply his/her talent and knowledge to work for the organization with high ethical standards in order to add more value to the company and for the economy.
Potential external events	<ul> <li>Russian invasion of Ukraine has already cast a dark shadow on global economy by threatening the global financial system to an unprecedented level.</li> <li>Global inflationary pressure will increase further due to big jump in oil and commodity prices as the war has also threatened to disrupt the global supply chain making the world trade costlier.</li> <li>Bangladesh is likely to face a series of troubles on both economic and geo-political fronts. Economic shock will be felt immediately whereas geo-political difficulty will be visible in the near future. Being globally exposed mostly through trade, the economic shock will be transmitted at a faster rate.</li> <li>Bangladesh's export to Russia and its adjacent countries would hamper and at the same time the import prices of fertilizer's especially urea might increase due to the war.</li> <li>Import cost would be higher due to global inflation which creates pressure on dollar prices.</li> <li>Bank may face issue in managing affordable fund in mid/long run due to vulnerable market condition caused by slow growth, higher inflation.</li> </ul>
Policies and processes for mitigating operational risk	The Bank has adopted policies which deal with managing different Operational Risks. Bank strongly follows KYC norms for its customer dealings and other banking operations. The Internal Control and Compliance Division of the Bank, the inspection teams of Bangladesh Bank and External Auditors conduct inspection on different branches and divisions at Head Office and submit reports presenting the findings of the inspections. Necessary control measures and corrective actions



		have been tal reports.	ken on the sugge	estions or obse	rvations made in these	
	Approach for calculating capital charge for operational risk	capital charg Bangladesh B	The Bank has adopted Basic Indicator Approach (BIA) to compute capital charge against operational risk under Basel III as per Bangladesh Bank Guidelines			
Qua	ntitative Disclosures					
b)	The capital	Capital requi	rement for opera	ational risk		
	requirements for	1	75.0		Amount in Million Tl	
	operational risk	Particulars			Solo	
					2024	
		The capital requirements for operational risk			76.53	
		Calculation o	al Risk: Basic			
		Indicator Ap				
					Amount in Million Th	
		Year	Gross	Average GI	15% of Average	
			Income (GI)		GI	
		2024	787.42			
		2023	470.51			
		2022	272.68			
		Total	1,530.60	510.20	76.53	

## I. LIQUIDITY RATIO

Qua	Qualitative Disclosures			
a)	Views of BOD on system to reduce liquidity Risk	Liquidity risk is the risk of probability to be unable to meet short term financial demands by the bank. This may occur due to the inability to convert a security or fixed asset to cash without a loss of capital and/or income in the process.		
		The Citizens Bank PLC has proficient Board of Directors that ha always been giving utmost importance to minimizing the liquidity risl of the Bank. In order to reduce liquidity risk, strict maintenance of Cash Reserve Ratio (CRR) and Statutory Liquidity Reserve (SLR) is also being emphasized on a regular basis. Apart from these, as part of Basel-III requirement Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) are also maintained under the guidance of the Board of Directors.		
	Methods used to measure Liquidity risk	The tools and procedures deployed by CZB to manage liquidity risks are comprehensive. The measurement tools used to assess liquidity risks are:  • Statutory Liquidity Requirement (SLR)  • Cash Reserve Ratio (CRR)  • Asset to Deposit Ratio (ADR)  • Structural Liquidity Profile (SLP)		



	Maximum Cumulative Outflow (MCO)		
	Liquidity Coverage Ratio (LCR)  Net Stable Funding Patio (NSER)		
		<ul> <li>Net Stable Funding Ratio (NSFR)</li> </ul>	
		<ul> <li>Liquid Asset to Total Deposit Ratio</li> </ul>	
		<ul> <li>Liquid Asset to Short Term Liabilities</li> </ul>	
	Liquidity risk management system	Liquidity risk management is a key banking fur part of the asset and liability management processes of banks is the maturity transformation of (liabilities) into long-term loans (assets) and inherently vulnerable to liquidity risk.	ess. The fundamental of short-term deposits
		The Board of Directors of the Bank set policy ratio limits for liquidity risk management. Management Committee (ALCO) is responsible prudential liquidity management. Ongoing liquidiscussed as a regular agenda of ALCO meeting a monthly basis. The ALCO of the Bank monitor and interest rate risk in line with the business str	Asset and Liability for both statutory and aidity management is , which takes place on is & manages liquidity
	Policies and	We strictly follow the Bangladesh Bank ins	
	processes for	guideline to prepare the structural liquidity pro	ofile and submit it to
	mitigating	Bangladesh Bank every month. We also pl	
	liquidity risk	information to the meeting of the Board of	
		Management Committee so that they can give n	
		adjust/prevent us from the branch of the limits se	t by the Board and the
0	(%) (%) D: 1	Bangladesh Bank,	STATE OF THE PARTY OF THE STATE OF
b)	ntitative Disclosures Liquidity		
U)	Coverage Ratio	Particulars	mount in Million Tk.
	Net Stable	Liquidity Coverage Ratio (LCR)	2024
	Funding Ratio	Net Stable Funding Ratio (NSFR)	507.95%
	(NSFR)	Stock of High-quality liquid assets	137.79%
	Stock of High-	Total net cash outflows over the next 30	4,499.89 885.89
	quality liquid	calendar days	883.89
	assets	Available amount of stable funding	14,951.54
	Total net cash	Required amount of stable funding	10,850.99
	outflows over the	required amount of stable funding	10,030.77
	next 30 calendar		
	days		
	Available amount		
	of stable funding		
	Required amount		
	of stable funding		



### J. LEVERAGE RATIO

1	Qual	litative Disclosures			
	a)	Views of BOD on system to reduce excessive leverage	Leverage ratio is the ratio of Tier 1 capital to total on and off-bal sheet exposures. It was introduced into the Basel III framework a non-risk-based backstop limit, to supplement risk-based carequirements. CZB has embraced this ratio along with Base guideline as a credible supplementary measure to risk be capital requirement and assess the ratio periodically. The Board believes that the Bank should maintain its leverage ratio on and a the regulatory requirements which will eventually increase the prooffidence in the organization.		
		Policies and processes for managing excessive on and off- balance sheet leverage	The bank reviews its leverage position as per the Guidelines on Risk Based Capital Adequacy (revised regulatory capital framework for banks in line with Basel III). In addition, the bank has Risk Appetite as per Credit Risk Management Policy and Risk Appetite Framework of the Bank. The Bank also employ Annual Budget Plan and Capital Growth Plan for managing excessive on and off-balance sheet leverage.		
	<b>O</b> uera	Approach for calculating exposure	proach for culating the Guidelines on Risk Based Capital Adequacy (revised regressionsure capital framework for banks in line with Basel III).		
	) )	Leverage Ratio	Amount in Million Tk.		
		On balance sheet exposure	Particulars Leverage Ratio	2024 19.42%	
		Off balance sheet	On balance sheet exposure	19,101.48	
		exposure Total exposure	Off balance sheet exposure  Total exposure	1,715.79	
$\bot$		an annual control production of the control of the	I otal exposure	20,817.27	

## K. Remuneration

Qual	litative Disclosures	[1] [1] [1] [1] [1] [1] [1] [1] [1] [1]
a)	Information relating to the bodies that oversee remuneration. Disclosures should include:	Mainly, the Human Resources Division overseas the 'remuneration' in line with its HR management strategy under supervision of Senior Management Team (SMT) of the Bank.
	Name, composition and mandate of the main body overseeing remuneration.	The pay scale is approved by the competent authority where the salaries and increments are fixed designation wise and the same is followed accordingly.
	External consultants whose advice has been sought, the body by which they were commissioned, and in what areas of the remuneration process.	The Senior Management Team (SMT), as responsible for overseeing the Bank's remuneration, overviews the remuneration and



A description of the scope of the bank's remuneration policy

(eg by regions, business lines), including the extent to which it is applicable to foreign subsidiaries and branches.

A description of the types of employees considered as material risk takers and as senior managers, including the number of employees in each group.

b) Information relating to the design and structure of remuneration processes. Disclosures should include:

An overview of the key features and objectives of remuneration policy.

Whether the remuneration committee reviewed the firm's remuneration policy during the past year, and if so, an overview of any changes that were made.

A discussion of how the bank ensures that risk and compliance employees are remunerated independently of the businesses they oversee.

c) Description of the ways in which current and future risks are taken into account in the remuneration processes. Disclosures should include:

An overview of the key risks that the bank takes into account when implementing remuneration measures.

An overview of the nature and type of the key measures used to take account of these risks, including risks difficult to measure (values need not be disclosed).

A discussion of the ways in which these measures affect remuneration.

A discussion of how the nature and type of these measures has changed over the past year and reasons for the change, as recommend to the Board of Directors of the Bank for approval of its required restructuring and modification in proportion with the industry best practices as per requirement.

The Bank has no External Consultant regarding 'remuneration' and its process. However, provision is there for acquiring expert opinion in case of settlement of employees' dues in case of death, penalty etc. if required, by the management.

The Bank is committed to maintain a fair and competitive remuneration structure and does not differentiate the pay structure by regions.

We 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 CZB.

Remuneration and other associated matters are guided by the Bank's approved Service Rules as well as instruction and guidance from the Board from time to time in line with the industry's prevailing practice with the objectives of retention and hiring of experienced workforce focusing on justifiable growth of the Bank.

Human Resources Division under guidance of the Senior Management Team (SMT), the Board and senior management reviews the issues of remuneration and its associated matters from time to time.

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. Human Resources Division does not make any difference with other mainstream/ regular employees and sets the remuneration as per the prevailing rule of the Bank primarily governed by the employees' service rule of the Bank.



well as the impact of changes on remuneration.

d) Description of the ways in which the bank seeks to link performance during a performance measurement period with levels of remuneration. Disclosures should include:

An overview of main performance metrics for bank, top-level business lines and individuals.

A discussion of how amounts of individual remuneration are linked to bank-wide and individual performance.

A discussion of the measures the bank will in general implement to adjust remuneration in the event that performance metrics are weak.

e) Description of the ways in which the bank seeks to adjust remuneration to take account of longer-term performance. Disclosures should include:

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.

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.

The business risk including credit/default risk, compliance & reputational risk are mostly considered when implementing the remuneration measures for each employee/group of employees.

Financial and Liquidity risks are also considered.

Different set of measures are in practice based on the nature & type of business lines/segments etc. These measures are primarily focused on the business target/goals set for each area of operation, branch vis-à-vis the actual results achieved as of the reporting date. The most vital tools & indicators used for measuring the risks are the asset quality (NPL ratio), Net Interest Margin (NIM), provision coverage ratio, credit-deposit ratio, cost-income ratio, growth of net profit, as well the non-financial indicators, namely, the compliance status with the regulatory norms, instructions have been brought to all concerned of the Bank from time to time.

While evaluating the performance of each employee annually, all the financial and non-financial indicators as per pre-determined set criteria are considered; and accordingly, the result of the performance varies from one to another and thus affect the remuneration as well.

No material change has been made during the year 202 that could affect the remuneration.

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 & profit target with the threshold of NPL ratio, cost-income ratio, capital to risk weighted asset ratio (CRAR), ROE, ROA,



liquidity position (maintenance of CRR and SLR) etc. 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. The Bank follows remuneration process as per set criteria with no in general adjustment in the event of weak performance metrics/scorecard. As per approved Service Rules, CZB does not have provision of any kind of variable remuneration. Description of the different forms of f) At CZB we recognize the effort variable remuneration that the bank performance of our employees based on our utilizes and the rationale for using these approved Service Rule which consists of base different forms. Disclosures should salary and different benefit packages mentioned include: earlier. Therefore, CZB does not use any form of variable remuneration in its remuneration An overview of the forms of variable process. remuneration offered (ie cash, shares and share-linked instruments and other forms. 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. **Quantitative Disclosures** Number of meetings held by the main No such meeting as there is no designated body overseeing remuneration during the remuneration committee. HR Division is financial year and remuneration paid to assigned to initiate any change proposal on its member. remuneration as per the People Management Policy of the bank and get necessary approval from Board of Directors (BoD). h) Number of employees having received Amount in Million Tk. a variable remuneration award during 2024 **Particulars** the financial year. Number Amount **Employees having** N/A N/A received a variable



	Number and total amount of guaranteed bonuses awarded during the financial year.	remuneration award (Profit Bonuses)			
	Number and total amount of sign-on awards made during the financial	Guaranteed bonuses awarded (Festival Bonuses)	2	21.52	
	year.	Sign-on awards made	N/A	N/A	
	Number and total amount of severance payments made during the financial year.	Severance payments made (PF, GF, Leave Encashment)	N/A	N/A	
i)	Total amount of outstanding deferred		Amount	in Million	Tk.
	remuneration, split into cash, shares and share-linked instruments and other forms.	Particulars		2024 Amount	
	Total amount of deferred remuneration paid out in the financial year.	Total amount of outsi deferred remuneration GF etc.):	0	N/A	
		Cash		N/A	
		Shares		N/A	
		Share-linked instrumer others		N/A	
		Total amount of defer remuneration paid ou 2024		N/A	
j)	Breakdown of amount of remuneration		Amount	in Million	Tk.
	awards for the financial year to show: - fixed and variable.	Particulars	8	2024 Amount	
	- deferred and non-deferred different forms used (cash, shares and	Breakdown of amoun remuneration:	t of	N/A	
	share linked instruments, other forms).	Fixed (Salary & allowa		N/A	
		Variable (Incentive Box	nuses)	N/A	
		Deferred (PF, GF)		N/A	
		Non-deferred		N/A	
	9	Different forms used	=	N/A	
		Cash		N/A	
		Shares		N/A	
		Share-linked instruments & others		N/A	
k)	Quantitative information about		Amount i	n Million T	Γk.
	employees' exposure to implicit (eg	Particulars		2024	
	fluctuations in the value of shares or			Amount	
	performance units) and explicit adjustments (eg claw backs or similar reversals or downward revaluations of	Total amount of outs deferred remuneration retained remuneration of	n and	N/A	



awards) of deferred remuneration and
retained remuneration:

Total amount of outstanding deferred remuneration and retained remuneration exposed to ex post explicit and/or implicit adjustments.

Total amount of reductions during the financial year due to ex post explicit adjustments.

Total amount of reductions during the financial year due to ex post implicit adjustments.

to ex post explicit and/or	
implicit adjustments	
Total amount of reduction during 2024 due to ex post	N/A
explicit adjustments	IN/A
Total amount of reduction during 2024 due to ex post	N/A
implicit adjustments	

