

Qualitative and
Quantitative disclosures
Under Pillar- III of Risk Based
Capital Adequacy(Basel-II)
December 31, 2013





Qualitative and Quantitative disclosures Under Pillar- III of Risk Based Capital Adequacy(Basel-II) December 31, 2013

The following detailed qualitative and quantitative disclosures are prepared in accordance with Guidelines on Risk Based Capital Adequacy (Basel-II) by Bangladesh Bank. The purpose of this report is to complement minimum capital requirement and Supervisory review process. These disclosures are intended for more transparent and more disciplined financial market where the participants can assess key information about the Bank's exposure to various risks.

A) Scope of Application

Qualitative Disclosures

a) The name of the top corporate entity to which this framework applies: Southeast Bank Limited.

b) The quantitative disclosures are made on the basis of consolidated audited financial statements of the bank and its Subsidiaries as at and for the year ended December 31, 2013 prepared under relevant international accounting and financial reporting standards as adopted by the Institute of Chartered Accountants of Bangladesh (ICAB) and related circulars/instructions issued by Bangladesh Bank from time to time. In preparing consolidated financial statements, the bank and its subsidiaries' financial statements are combined on a line by line basis by adding together like items of assets, liabilities, equity, income and expenses. However all intra group balances, transactions, profits and losses are eliminated in full.

Southeast Bank Ltd has two subsidiaries and the descriptions are given below.

Southeast Bank Capital Services Limited
• Date of Incorporation: September 23, 2010
• Date of Commencement : September 23, 2010
• Authorised Capital: Tk. 3000 million
• Paid up Capital: Tk. 1000 million
• Ownership Interest in Capital: Tk. 989.90 million (98.99 percent)

Southeast Financial Services (UK) Limited
• Date of Incorporation: February 22, 2011
• Date of Commencement : September 26, 2011
• Paid up Capital: Tk. 38.73 million
• Ownership Interest in Capital: Tk. 100 percent

c) The BRPD circular 05 dated 09 April 2005 regarding 'Single Borrower Exposure Limit' is being applied by the Bank in determining maximum amount of finance to the subsidiaries of the Bank. As on year end 2013, the bank had a credit line to Southeast Capital Services Ltd of BDT 2232.24 million.

Quantitative Disclosure

d) Southeast Bank Ltd has two subsidiaries: Southeast Bank Capital Services Ltd. and Southeast Financial Services (UK) Ltd. Assets and liabilities of these subsidiaries are consolidated with the financials of the parent company. There is no capital deficiency in the financial year 2013.

B) Capital Structure

Qualitative Disclosures:

a) The regulatory capital under Basel-II is composed of (I) Tier-1 (Core Capital) and (II) Tier-2 (Supplementary Capital).

Tier-1 capital is the core measure of a bank's financial strength. It consists of highest quality capital items which are stable in nature and allows a bank to absorb losses on an ongoing basis. It includes paid-up capital, statutory reserve, general reserve, retained earnings, minority interest in subsidiaries.

Tier-2 capital lacks some of the characteristics of the core capital but also bears loss absorbing capacity to a certain extent. General provision, revaluation reserves etc are part of Tier 2 capital.

Tier-1 capital of the bank as of December 31, 2013 is Tk. 17608.50 million which is 80.75% of total eligible capital and out of total Tier-1 capital 49.60% is paid up & 36.60% is statutory reserve. Tier-2 capital is Tk. 4199.10 million which is 19.25% of total eligible capital and the major contributors are general provision 48.42% & asset revaluation reserves 50.04%.

Capital requirement rules:

The calculation of Tier 1 capital, Tier 2 capital, and Tier 3 capital shall be subject to the following conditions:

- The amount of Tier 2 capital will be limited to 100% of the amount of Tier 1 capital.
- 50% of revaluation reserves for fixed assets and securities eligible for Tier 2 capital.
- 10% of revaluation reserves for equity instruments eligible for Tier 2 capital.
- Subordinated debt shall be limited to a maximum of 30% of the amount of Tier 1 capital.

- v. A minimum of about 28.5% of market risk needs to be supported by Tier 1 capital. Supporting of Market Risk from Tier 3 capital shall be limited up to maximum of 250% of a bank's Tier 1 capital that is available after meeting credit risk capital requirement.

Quantitative Disclosures:

Figures in Million BDT

b)Tier-1(Core capital)	Consolidated	Solo
Paid-up capital	8,732.86	8,732.86
Non- repayable share premium account	0.00	0.00
Statutory reserve	6,444.82	6,444.82
General reserve	247.65	247.65
Retained earnings	2,172.67	2,159.17
Minority interest in subsidiaries	10.48	
Non cumulative irredeemable preference shares		
Dividend equalization account		
i) Total Tier-1 capital	17,608.48	17,584.50
c)Tier-2 (Supplementary capital)		
General provision(unclassified loans, SMA, off balance sheet)	2,033.32	2,033.32
Asset revaluation reserves up to 50%	2,101.40	2,101.40
Revaluation reserves for securities up to 50%	64.37	64.37
Revaluation reserves for equity instruments up to 10%		
All other preference shares		
Subordinated debt		
ii)Total Tier-2 capital	4,199.09	4,199.09
d)Other deductions from capital		
iii)Total eligible capital(i+ii)	21,807.57	21,783.59

C) Capital Adequacy

Qualitative Disclosures:

a) 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-II framework as per the guidelines of Bangladesh Bank.

Quantitative Disclosures:

Figures in Million BDT

Capital Adequacy	Consolidated	Solo
b) Capital requirement for Credit Risk	17,399.47	17,586.08
c) Capital requirement for Market Risk	1,287.41	958.43
d) Capital requirement for Operational Risk	1,332.95	1,306.28
Minimum capital requirement(MCR)	20,009.99	19,850.79
Total capital maintained	21,807.57	21,783.59
Capital surplus over MCR	1,797.72	1,932.79
e) Capital Adequacy Ratio(CAR)	10.90%	10.97%
Capital Adequacy Ratio(CAR) with Tier-1	8.80%	8.86%



D) Credit Risk

Qualitative Disclosures:

a) Credit risk is the potential loss that may arise from a borrower's failure to repay a loan or meet its obligation in accordance with agreed term.

Credit Approval

Bank's credit policy has been prepared in line with Bangladesh Bank guidelines illustrating the approval process and delegation of authority. The approval process segregates relationship management/marketing from the approval authority. The approval authorities are delegated to different levels of management and Board. Board of Directors of the bank has the highest level of authority to approve any credit proposal and delegate such authority to the competent authority (MD, DMD, EC, Board, Branch Manager). The Corporate Banking Division submits the proposals to the Head Office Credit Review Committee (HOCRC) to review and forward it to the competent authority for approval.

Credit Administration

The bank accomplishes documentations and makes disbursements with utmost care to reduce the potential credit risk. The disbursement authority is given to the branches within approved limit after the completion of necessary documentation. Furthermore, the bank constantly monitors clients' repayment behaviors, fulfillment of conditions given before disbursement and compliance of covenants in post disbursement period.

Credit Monitoring

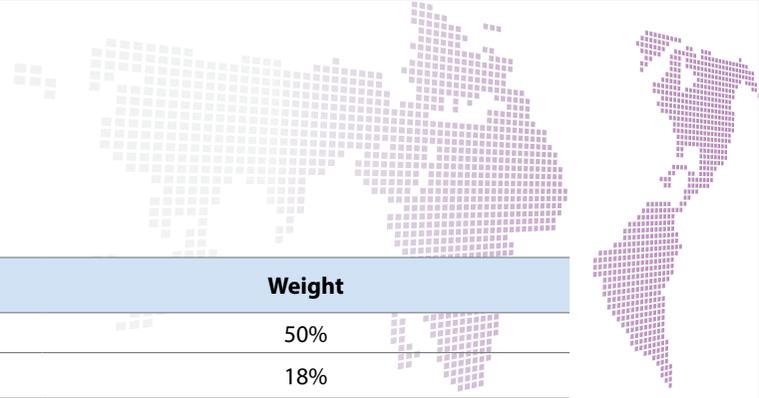
The loan portfolio with classification status is reviewed periodically and brought to the notice of senior management regarding down gradation, overdue, special mention account (SMA), classified and rescheduled portfolio along with early alert list for their information and guidance. The Branches are communicated through letters and circulars for implementation of efficient credit risk management in a proper manner including adherence to the Bank's and Bangladesh Bank's rules and regulations.

Credit Assessment and Grading

Know Your Client (KYC) is the first step to analyze any credit proposal. Banker-Customer relationship is established through opening of CD/SB accounts of the customers. Proper introduction, photographs of the account holders/ signatories, passports etc., and all other required papers as per Bank's policy are obtained during account opening. Physical verification of customer address is done prior to credit appraisal. At least three Cs, i.e., Character, Capital & Capacity of the customers are confirmed. Credit Appraisals include the details of amount and type of loan(s) proposed, purpose of loan (s), result of financial analysis, loan Structure (Tenor, Covenants, Repayment Schedule, Interest), security arrangements. The above are minimum components to appraise a credit and there are other analyses depending on the credit nature.

The bank follows the CRG manual of Bangladesh Bank circulated on December 11, 2005 through BRPD circular no. 18. Borrowers are assigned risk grades based on the qualitative and quantitative factors of their business. There are 08 grades based on the marks obtained in qualitative and quantitative factors. The grades and factors are:

Grading	Short Name	Marks	Number
Superior	SUP	85-100	1
Good	GD	75-84	2
Acceptable	ACCPT	65-74	3
Marginal/Watch list	MG/WL	55-64	4
Special Mention	SM	45-54	5
Sub standard	SS	35-44	6
Doubtful	DF	25-34	7
Bad & Loss	BL	<25	8



Quantitative and Quantitative factors/ principal risk components	Weight
Financial Risk	50%
Business/Industry Risk	18%
Management Risk	12%
Security Risk	10%
Relationship Risk	10%

Credit Risk Mitigation

Potential credit risks are mitigated by taking primary and collateral securities. There are other risk mitigants like netting agreements, credit insurance and other guarantees. The legal certainty and enforceability of the mitigants are verified by the professionals of the respected fields. Collateral types which are eligible for risk mitigation include: cash; residential, commercial and industrial property; fixed assets such as motor vehicles, plant and machinery; marketable securities; commodities; bank guarantees; and letters of credit. Collateral is valued by independent third party surveyor in accordance with the credit policy and procedures.

Past Due and Impaired Credit

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. For loan classification and maintenance of specific and general provision Bank follows BRPD circular no-14 and 19 of 2012 and 05 of 2013, and advised by Bangladesh Bank from time to time.

Approaches followed for specific and general allowances:

Particulars	Short Term Agri Credit	Consumer Financing			SMEF	Loans to BHs/MBs/SDs	All other Credit
		Other than HF, LP	HF	LP			
Standard	5%	5%	2%	2%	0.25%	2%	1%
SMA	-	5%	2%	2%	0.25%	2%	1%
SS	5%	20%	20%	20%	20%	20%	20%
DF	5%	50%	50%	50%	50%	50%	50%
B/L	100%	100%	100%	100%	100%	100%	100%

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

Base for Provision:

For the following types of eligible collaterals, provision is maintained at the stated rates mentioned above on the base for provision. Base for provision is calculated deducting interest suspense and the value of eligible collateral from outstanding classified loans.

- i. Deposit with the same bank under lien against the loan
- ii. Government bond/savings certificate under lien,
- iii. Guarantee given by Government or Bangladesh Bank.

For all other eligible collaterals, the provision will be maintained at the stated rates mentioned above on the balance calculated as the greater of the following two amounts:

- i. Outstanding balance of the classified loan less the amount of Interest Suspense and the value of eligible collateral; and
- ii. 15% of the outstanding balance of the loan.

Eligible Collateral:

The following collateral is included as eligible collateral in determining base for provision:

- 100% of deposit under lien against the loan
- 100% of the value of government bond/savings certificate under lien
- 100% of the value of guarantee given by Government or Bangladesh Bank



- 100% of the market value of gold or gold ornaments pledged with the bank.
- 50% of the market value of easily marketable commodities kept under control of the bank
- Maximum 50% of the market value of land and building mortgaged with the bank
- 50% of the average market value for last 06 months or 50% of the face value, whichever is less, of the shares traded in stock exchange.

Subjective Judgment

Considering the nature and performance of a loan, the bank can also classify a particular loan on the basis of subjective judgment taking into consideration the factors such as uncertainty or doubt of repayment, continuous loss of capital, adverse situation, decrease of value of securities, legal suit etc. However, regardless of all rules and regulations the central bank can classify any loan on the basis of their subjective judgment as well as can instruct the bank to make additional provision on non-performing loans.

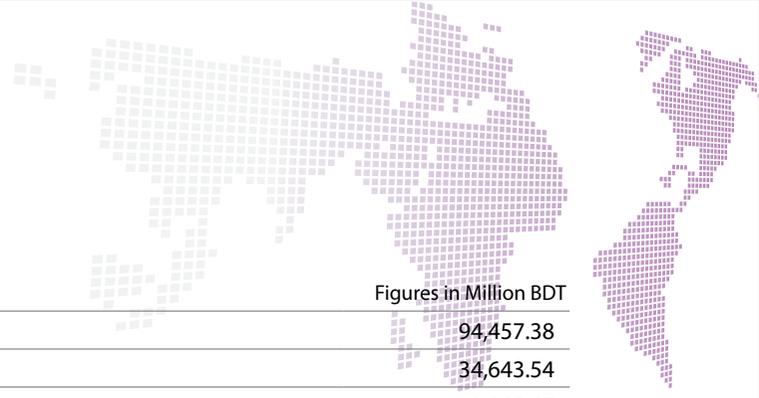
Quantitative Disclosures:

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

Total gross credit risk exposures by major types: Bangladesh Bank guidelines on Basel II, stipulated to segregate bank's asset portfolio into different categories, and the below table shows our gross exposure in each asset category.

Figures in Million BDT

Types		Consolidated	Solo
a	Cash	1,802.67	1,802.67
b	Claims on Bangladesh Government and Bangladesh Bank	61,816.29	61,816.29
c	Claims on Banks & NBFIs	9,117.70	9,117.44
d	Claims on Corporate	100,706.94	100,800.02
e	Claims under Credit Risk Mitigation	9,672.14	9,672.14
f	Claims categorized as retail portfolio & SME (excluding consumer loan)	5,434.07	5,434.86
g	Consumer finance	991.89	991.89
h	Claims fully secured by residential property	356.47	356.47
i	Claims fully secured by commercial real estate	3,794.60	3,794.60
j	1.Past Due Claims (Risk weights are to be assigned net of specific provision):		
	Where specific provisions are less than 20 per cent of the outstanding amount of the past due claim ;	1,563.22	1,563.22
	Where specific provisions are no less than 20 per cent of the outstanding amount of the past due claim.	576.02	576.02
	Where specific provisions are more than 50 per cent of the outstanding amount of the past due claim.	548.58	548.58
	2. Claims fully secured against residential property that are past due for more than 90 days and/or impaired specific provision held there-against is less than 20% of outstanding amount	34.33	34.33
	3. Loans and claims fully secured against residential property that are past due by 90 days and /or impaired and specific provision held there-against is more than 20% of outstanding amount	1.62	1.62
k	Capital Market Exposure	2,232.20	2,965.42
l	Unlisted equity investments and regulatory capital instruments issued by other banks(other than those deducted from capital) held in banking book	214.99	1,243.41
m	Investments in premises, plant and equipment and all other fixed assets	7,795.65	7,642.27
n	Claims on all fixed assets under operating lease		
o	All other assets		
	i) Claims on GoB & BB	855.11	855.11
	ii)Staff loan	146.33	146.33
	iv) Claims on Offshore Banking Unit	128.29	128.29
	v) Others	2,658.20	2,357.84
	Total	210,447.31	211,848.82



c) Geographical distribution of exposures:

		Figures in Million BDT
Region Based	Dhaka	94,457.38
	Chittagong	34,643.54
	Rajshahi	2,048.47
	Sylhet	3,092.43
	Khulna	837.57
	Rangpur	529.86
	Barisal	80.85
	Total	135,690.09
Country Based:	Domestic	135,690.09
	Overseas	

d) Major Industry wise distribution of exposures (Industrial Loan):

	Figures in Million BDT
Textile and Garments Industries including Spinning Industries	30,191.10
Food and allied Industries	4,004.30
Pharmaceutical Industries	989.60
Chemical, Fertilizer, etc.	210.60
Cement and Ceramic Industries	2,982.50
Service Industries	1,659.90
Other Industries	21,172.90
Total	61,210.90

e) Residual contractual maturity breakdown of the whole portfolio:

	Figures in Million BDT
On demand	29,632.99
Less than three months	22,798.74
More than three months but less than one year	40,041.77
More than one year but less than five years	34,854.55
More than five years	8,362.05
Total	135,690.09

f) Major Industry type amount of impaired loans:

	Figures in Million BDT
Agriculture	0.95
Large and Medium Scale Industries	1,424.55
Small and Cottage Industry	75.10
Exports	131.30
Commercial Lending	3,102.05
Finance to NBFIs	0.00
Real Estate	221.19
Retail Banking	10.59
Transport & Communication	0.00
Credit Card	46.90
Others	337.61
Total	5,350.24

g) Gross Non Performing Assets (NPAs)

Figures in Million BDT

Gross Non Performing Assets (NPAs)	
Nonperforming assets to outstanding loans and advances	3.94 %
Movement of Non Performing Assets (NPAs):	
Opening balance	5,687.90
Additions	2,462.70
Reductions	2,800.40
Closing balance	5,350.20
Movement of specific provisions for NPAs:	
Opening balance	2,326.31
Provision made during the period	738.30
Write off	407.85
Write back of excess provisions	
Closing balance	2,656.76

E) Equities: Disclosures for Banking Book Positions

Qualitative Disclosures:

a) 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.

Quantitative Disclosures:

b) Values of investments as disclosed in the Balance Sheet:

Figures in Million BDT

	Consolidated		Solo	
	Cost Price	Market Price	Cost Price	Market Price
Unquoted Share	214.98	214.98	214.98	214.98
Quoted Share	6,513.20	5,200.20	4,759.80	3,555.30

For Banking Book Equity

Figures in Million BDT

	Consolidated	Solo
c) The cumulative realized gains (losses) arising from sales and liquidations in the reporting period	-	-
d)		
Total unrealized gains(losses)	-	-
Total latent revaluation gains (losses)	-	-
Any amounts of the above included in Tier 2 capital	-	-

e)

Figures in Million BDT

	Capital Requirement	
	Consolidated	Solo
Unquoted Share	21.49	21.49
Quoted Share	1,040.00	711.10

As equities do not have any maturity, we have calculated risk weighted assets for unquoted equities on the basis of fixed risk weight which is 125% of investment value. And for quoted share capital charge is 10% for both specific and market risks.

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

Qualitative Disclosures:

Interest rate risk affects the bank's financial condition due to adverse movements in interest rates of interest sensitive assets. Changes in interest rates have two types of impact:

- i. Earnings perspective: It affects a bank's earnings by changing its net interest income and the level of other interest sensitive income and operating expenses.
- ii. Economic value perspective: The economic value of future cash flows changes when interest rate changes.

At present SEBL is following the Bangladesh Bank prescribed format for assessing the economic value due to interest rate shock.

Quantitative Disclosures:

i. Earnings perspective:

Here, we have used maturity gap method to measure changes in earnings due to changes in interest rates.

Figures in Million BDT

Up to 12 Month(Cumulative Gap)	Percentage changes in interest rate	Net interest income and re-pricing impact
(18,619.80)	1% increase in interest rate	(1,861.98)
	1% decrease in interest rate	1,861.98
	2% increase in interest rate	(3,723.96)
	2% decrease in interest rate	3,723.96
	3% increase in interest rate	(5,585.94)
	3% decrease in interest rate	5,585.94

G) Market Risk

Qualitative Disclosures:

a) View of the Board of Directors 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 risk, are purchased to make profit from spreads between the bid and ask price are subject to market risk. SEBL is exposed to market risk mostly stemming from Government Treasury Bills and Bonds, Shares of listed Public Limited Companies, foreign currency etc.

Methods used to measure Market Risk:

There are several methods used to measure 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 marked to market method and for measuring foreign exchange risk, the bank uses VaR analysis.

We use standardized (Rule Based) method for Calculating capital charge against market risks for minimum capital requirement of the Bank under Basel-II.



Market Risk Management System:

The Bank has its own Market Risk Management System which includes Asset Liability Risk Management (ALM) and Foreign Exchange Risk Management under the core risk management guidelines.

Asset Liability Management (ALM): The ALM policy specifically deals with liquidity risk management and interest rate risk management framework.

Foreign Exchange Risk Management: Foreign exchange risk arises when the bank is involved in foreign currency transactions. These include foreign currency exchange, placement, investments, loans, borrowings and different contractual agreements. We use different hedging techniques to mitigate foreign exchange risks exposed to the bank.

Policies and processes for mitigating market risk are mentioned below:

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

Quantitative Disclosures:

b) The capital requirements for:

Figures in Million BDT

	Consolidated	Solo
Interest rate risk	176.69	176.69
Equity position risk	1,040.00	711.06
Foreign exchange risk	70.68	70.68
Commodity risk		
Total	1,287.41	958.43

H) Operational risk

Qualitative Disclosures:

a) View of the Board of Directors 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 this risk through a control based environment in which processes are documented, authorization is 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:

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.

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 Audit & Inspection Unit of Internal Control and Compliance Division of the Bank, the inspection teams of Bangladesh Bank and External Auditors conduct inspection of different branches and divisions at Head Office of the Bank and submit reports presenting the findings of the inspections. Necessary control measures and corrective actions have been taken on the suggestions or observations made in these reports.

Approach for calculating capital charge for operational risk:

The Bank has adopted Basic Indicator Approach (BIA) to compute capital charge against operational risk under Basel-II as per Bangladesh Bank Guidelines.

Quantitative Disclosures:

Figures in Million BDT

	Consolidated	Solo
b) The capital requirements for operational risk	1322.95	1306.28

Calculation of Capital Charge for Operational Risk (Consolidated)

Basic Indicator Approach

Figures in Million BDT

Year	Gross Income (GI)	Average GI	15% of Average GI
December, 2011	8,552.20		
December, 2012	8,222.10	8,819.70	1,322.95
December, 2013	9,684.80		
Total GI	26,459.10		