Market Discipline
Disclosures on Risk Based Capital (Pillar 3 of Basel III Framework)

The Basel Committee for Banking Supervision (BCBS) introduced a set of regulatory guidelines known as Basel III and later adopted by Bangladesh Bank under the guidelines on risk based capital adequacy to continue to strengthen the risk management frameworks and enhancement of long-term stability within banking organizations. Basel III includes three pillars that address: i) Minimum Capital Requirement ii) Supervisory review process and iii) Market discipline. In addition to the three pillars noted above, it also introduced leverage ratio and liquidity standards (namely liquidity coverage ratio (LCR) and net stable funding ratio (NSFR)) which have greater business impact for banks.

The qualitative and quantitative disclosures under Pillar 3 of Basel III are made according to revised 'Guidelines on Risk Based Capital Adequacy' (Revised Regulatory Capital Framework for banks in line with Basel-III) for banks issued by Bangladesh Bank (Central Bank of Bangladesh). These disclosures are intended to complement the i) Minimum Capital Requirement (MCR) and ii) Supervisory Review Process (SRP). The provision of meaningful information about common key risk metrics to market participants is a fundamental estimation of a sound banking system. The purpose of market discipline is to disclose relevant information on capital adequacy in relation to various risk of the bank so that the stakeholders can assess the position of a bank regarding holding of assets and to identify the risks relating to the assets, risk exposures, risk assessment processes and capital adequacy to meet probable loss of assets as well as can make the economic decision.

The disclosure framework does not conflict with requirements under accounting standards as set by the Bangladesh Bank from time to time. For each separate risk area (e.g. investment, market, operational, banking book profit rate risk, equity etc.) banks describe its risk management objectives and policies, including:

- Strategies and processes
- The structure and organization of the relevant risk management function
- The scope and nature of risk reporting and/or measurement systems policies for hedging and/or mitigating risk.

The following principles aim to provide a solid foundation for achieving transparent, high-quality Pillar 3 risk disclosures that will enable users to better understand and compare a bank's business and its risks. The principles of these disclosures are i) Clear to understand ii) Comprehensive iii) Meaningful to users iv) Consistent over time v) and Comparable across banks.

The following components set out in tabular form are the disclosure under Pillar-3 as on 31 December 2023 are as under:

A. Scope of Application
B. Capital Structure
C. Capital Adequacy
D. Investment Risk
E. Equities: Disclosures for Banking Book Positions
F. Profit Rate Risk in the Banking Book (PRRBB)
G. Market Risk
H. Operational risk
I. Liquidity Ratio
J. Leverage Ratio
K. Remuneration

A) Scope of Application

Qualitative Disclosures:

(a)	The name of the top corporate entity in the group to which this guidelines applies.	**Export Import Bank of Bangladesh Ltd.**
(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	EXIM Bank has 3 (Three) subsidiaries as on the reporting date namely; EXIM Exchange Company (UK) Limited, EXIM Finance (Hong Kong) Limited and EXIM Islami Investment Limited. A brief description of the Bank and its subsidiaries are given below:
	(i) that are fully consolidated;	Export Import Bank of Bangladesh Ltd. (EXIM Bank) was incorporated as a public limited company in Bangladesh under Companies Act, 1994. It commenced its banking business on August 03, 1999 under the license issued by Bangladesh Bank. The Bank has 147 (One hundred forty seven) branches and 68 (Sixty eight) sub-branches in the reporting date. The Bank has 03 (Three) Off-shore Banking Units (OBU). The Bank went for Initial Public Offering in 2004 and its shares are listed with Dhaka Stock Exchange Limited and Chittagong Stock Exchange Limited as a publicly traded company for its general class of shares. The principal activities of the Bank are to provide all kinds of commercial banking services to its customers through its branches. There are 03 (Three) Subsidiaries of EXIM Bank which are as under: i) EXIM Exchange Company (UK) Limited, a subsidiary company of EXIM Bank, was incorporated in U.K. on February 10, 2009 and commenced its remittance business on June 30, 2009. The Paid up Capital of the company is GBP 0.45 million against Authorized Capital for GBP 1.00 Million. The principal activity of the company is that of the provision of money transfer services and advising on letters of credit. ii) EXIM Finance (Hong Kong) Limited, a subsidiary company of EXIM Bank, was incorporated in Hong Kong on March 22, 2019 and commenced its business on October 15, 2019. The company is engaged with Trade Finance activities and it's Paid up Capital is HKD 7.8 Million only. iii) EXIM Islami Investment Limited is a subsidiary company of

		EXIM Bank incorporated as a public limited company and started its operation on December 01, 2010. The Paid up Capital of the company is BDT 200.00 Crore against Authorized Capital for BDT 500.00 Crore. The main objective of the company is to act as a full-fledged merchant banker. The company is also authorized to buy, sell, hold or otherwise acquire or invest the capital of Company in shares, stocks and other Shariah based securities.
	(ii) that are given a deduction treatment; and	Not applicable
	(iii) that are neither consolidated nor deducted (e.g. where the investment is risk-weighted).	All the subsidiaries are consolidated
(c)	Any restrictions, or other major impediments, on transfer of funds or regulatory capital within the group.	Not applicable

Quantitative 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:

a)	Summary information on the terms and conditions of the main features of all capital instruments, especially in the case of capital instruments eligible for inclusion in CET 1, Additional Tier 1 or Tier 2.	Regulatory capital, as stipulated by the revised RBCA guidelines by Bangladesh Bank, is categorized into two 'Tiers' according to the order of quality of capital (Tier I & II). i) Tier-I capital is called 'going concern capital'. It divided into two categories a) Common Equity Tier-I capital of EXIM bank consists of 1. Paid up capital 2. Statutory Reserve 3. General Reserve 4. Retained Earnings 5. Dividend Equalization Reserve and 6. Minority interest in Subsidiaries b) Additional Tier-I – of EXIM bank consists of 1) Mudaraba Perpetual debt ii) Tier-II capital (gone-concern capital) of EXIM bank consists of 2) General provision 3) Mudaraba Subordinated debt The Bank aims to comply with all the required conditions for maintaining regulatory capital as stipulated in the revised RBCA guidelines by Bangladesh Bank as per following details: 1. Common Equity Tier-I of at least 4.5% of the total RWA. **Status of Compliance: Complied** 2. Tier-I capital will be at least 6.0% of the total RWA. **Status of Compliance: Complied.** 3. Minimum CRAR of 10% of the total RWA. **Status of Compliance: Complied**. 4. Additional Tier-I capital can be admitted maximum up to 1.5% of the total RWA or 33.33% of CET-I whichever is higher. **Status of Compliance: Complied** 5. Tier-II capital can be admitted maximum up to 4.0% of the total RWA or 88.89% of CETI, Whichever is higher. **Status of Compliance: Complied**. . 6. In addition to minimum CRAR, Capital Conservation Buffer (CCB) of 2.5% of the total RWA is being introduced which needs to be maintained in the form of CET1. **Status of Compliance: Complied**

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	As on the reporting date, the Bank had a capital of BDT 5,504.92 Crore (Solo Basis) comprising Tier-I capital of BDT 3,808.55 Crore (out of which CET-1 capital is BDT 3,208.55 Crore and AT-1 capital is BDT 600.00 Crore) and Tier-II capital of BDT 1,696.37 Crore. Following table presents component-wise details of capital as on reporting date i.e. 31 December 2023:
c)	1) Regulatory Adjustments/Deductions from capital (from Common Equity Tier-I Capital) 2) Regulatory Adjustments/Deductions from capital (from Tier-II Capital)	
d)	Total eligible capital	

BDT in Crore

Sl. No	Particulars	Solo Basis
Elements of Common Equity Tier-I Capital		
1	Paid up capital	1,447.56
2	Non-repayable Share premium account	0.00
3	Statutory Reserve	1,447.56
4	General Reserve	150.00
5	Retained Earnings	157.16
6	Dividend Equalization Account	6.28
7	Minority interest in Subsidiaries	0.00
8	Non-Cumulative Irredeemable Preferences shares	0.00
9	Other (if any item approved by Bangladesh Bank)	0.00
10	Sub Total(1+2+----------+9)	3,208.55
11	**Deductions from Common Equity Tier-I Capital**	**-**
12	Total Common Equity Tier-I Capital (10-11)	3,208.55
13	**Additional Tier-I Capital**	**600.00**
14	**Total eligible Tier -I Capital (going concern Capital) (12+13)**	**3,808.55**
Elements of Tier-II Capital		
15	General Provision	676.37
16	Subordinated debt	1020.00
17	Revaluation Reserves on Fixed Assets	-
18	Sub Total (15+16+17)	1,696.37
19	**Deductions from Tier-II Capital**	**-**
20	**Total eligible Tier -II Capital (gone-concern Capital) (18-19)**	**1,696.37**
	Total Eligible Capital (14+20)	**5,504.92**

C) Capital Adequacy		
Qualitative Disclosures:		
a)	A summary discussion of the bank's approach to assess the adequacy of its capital to support current and future activities.	In terms of RBCA guidelines on Basel-III framework issued by Bangladesh Bank, the bank has adopted a) Standardized Approach for Credit (Investment) Risk; b) Standardized (rule based) approach for Market Risk and c) Basic Indicator Approach for Operational Risk. As per capital adequacy guidelines, the bank is required to maintain a minimum CRAR of 10.00% with regards to Credit risk, Market risk and Operational risk and capital Conservation Buffer (CCB) @ 2.50% comprised of Common Equity Tier 1 capital, above the regulatory Minimum capital requirement. EXIM Bank focuses on strengthening and enhancing its risk management culture and internal control processes rather than increasing capital to cover up weak risk management and control practices. Earlier, the bank generated most of its incremental capital from retained profit (stock dividend, regulatory profit transfer to statutory reserve) to balance the growth of Risk Weighted Assets (RWA). So far, The bank has issued BDT 2,150.00 Crore Mudaraba Subordinated Tier II Bond (outstanding amount is BDT 1,340.00 crore out of which BDT 1,020.00 crore can be used as capital now). Bank has strengthen its capital base (mainly AT-1) by introducing Mudaraba Perpetual Bond (1st issuance) for Tk.600.00 crore in recent year. The Bank's strategy is to manage and maintain strong Capital to Risk-weighted Asset Ratio (CRAR) through investing on those who are high grade rated investment customer and those who are low risk weight bearing customer. The bank is able to maintain capital to risk weighted asset ratio at 14.48% on Solo basis against the regulatory minimum level of 12.50%. In addition to the MCR, Capital conservation Buffer (CCB) is also considered while maintaining the Capital to Risk Weighted Asset Ratio (at present which is 3.94% well above the requirement). Capital for BDT 5,504.92 Crore above the regulatory MCR which is meant for supporting anticipated future business growth and to serve as a buffer for unexpected shock thereby ensuring that the Bank's CRAR does not fall below the regulatory minimum level even in adverse condition and also can be considered as sufficient for Pillar II requirement and ultimately can be treated as adequate capital. The Bank's policy is to manage and maintain its capital with the objective of maintaining strong capital ratio and high rating. The Bank also ensures that its capital 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.

Quantitative Disclosures:

		Sl. No.	Particulars	Solo	Consolidated
b)	Capital requirement for Credit (Investment) Risk	1	Capital Requirement for Credit Risk	3,391.65	3,381.92
c)	Capital requirement for Market Risk	2	Capital Requirement for Market Risk	194.02	213.52
d)	Capital requirement for Operational Risk	3	Capital Requirement for Operational Risk	215.53	220.34
		4	Minimum Capital Requirement	3,801.20	3,815.78
e)	Total capital, CET1 capital, Total Tier 1 capital and Tier 2 capital ratio: • For the consolidated group; and • For stand alone	5	CET-1 Capital To Total Capital Ratio:	58.29%	58.57%
		6	Tier 1 Capital To Total Capital Ratio:	69.18%	69.34%
		7	Tier-II Capital To Total Capital Ratio:	30.82%	30.66%
		8	Total Risk Weighted Assets (RWA)	38,012.07	38,157.78
		9	**Total CRAR**	**14.48%**	**14.60%**
		10	CET-I capital to RWA	8.44%	8.55%
f)	Capital Conservation Buffer (2.50% of Total RWA)	11	Tier-I capital to RWA	10.02%	10.13%
		12	Tier-II capital to RWA	4.46%	4.48%
		13	Total Eligible Capital	5,504.92	5,572.14
g)	Available Capital under Pillar-II Requirement	14	**Capital Conservation Buffer**	**3.94%**	**4.05%**
		15	**Available Capital under Pillar II requirement**	**753.41**	**802.42**

D) Investment (Credit) Risk

Qualitative Disclosures:

a) **The general qualitative disclosures:**

*** Definitions of past due and impaired (for accounting purpose)**

Any Continuous Investment 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 investment 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. Whereas, In case of any installment(s) or part of installment(s) of Fixed Term Investment is not repaid within the fixed expiry date, the amount of unpaid installment(s) will be treated as past due/overdue after six months of the expiry date.

Failure to repay an investment on time could have negative implications for the customer's credit worthiness or cause the investment terms to be permanently adjusted. In case of past due investment, the bank may charge compensation which does not come under bank's income rather the charges use for benevolent purpose.

An investment is impaired when it is not likely the bank will collect the full value of the investment because the creditworthiness of a customer has fallen. The bank will pursue either restructuring or foreclosure as a result of the impaired status of the investment. Further, the bank must report the investment as impaired on any of its financial statements and CIB of Bangladesh bank.

With a view to strengthening investment discipline and bring classification and provisioning regulation in the line with international standard, a phase wise program for classification and provisioning was undertaken by the Bank as per Bangladesh Bank circulars issued from time to time. In this regard, all the investments are grouped into four categories for the purpose of classification, namely (i) Continuous Investment, (ii) Demand Investment, (iii) Fixed Term Investment and (iv) Short-term Agricultural and Micro Investment. The above investments are classified as follows:

****Description of approaches followed for specific and general allowances and statistical methods:**

Classification Rules for Continuous, Demand, Fixed Term and Short-term agricultural and Micro Investment (Without Cottage, Micro and Small Finance under CMSME)

Type of Investment	Overdue	SMA	SS	DF	BL	Default
Continuous Investment	From the following day of the expiry date	Remain overdue for 2 months or beyond but less than 3 months	Remain overdue for 3 months or beyond but less than 9 months	Remain overdue for 9 months or beyond but less than 12 months	Remain overdue for 12 months or beyond	Remain overdue for 6 months
Demand Investment	From the following day of the expiry date	Remain overdue for 2 months or beyond but less than 3 months	Remain overdue for 3 months or beyond but less than 9 months	Remain overdue for 9 months or beyond but less than 12 months	Remain overdue for 12 months or beyond	Remain overdue for 6 months
Fixed Term Investment	After 6 months of installment due date	Remain **overdue** for 2 months or beyond but less than 3 months	Remain **overdue** for 3 months or beyond but less than 9 months	Remain **overdue** for 9 months or beyond but less than 12 months	Remain **overdue** for 12 months or beyond	Remain **overdue** for 6 months
Short Term Agri and Micro Investment	After 6 months of expiry/ installment due date	————	Irregular for 12 months or beyond but less than 36 months from stipulated due date.	Irregular for 36 months or beyond but less than 60 months from stipulated due date.	Irregular for 60 months or more from stipulated due date.	Remain overdue for 6 months

Please be aware that, as per new BRPD Circular 03/2019, Term Investment facility will be treated as overdue/ classified on the basis of installment due date/ expiry date. i.e. If any installment or part of installment not paid within due date (date of payment) then overdue or classification status will be calculated from the installment due date/ expiry date.

Classification Rules for Continuous, Demand, Fixed Term and Short-term agricultural and Micro Investment (applicable for Cottage, Micro and Small Finance under CMSME)

Type of Investment	Overdue	SMA	SS	DF	BL	Default
Continuous Investment	From the following day of the expiry date	Remain overdue for 2 months or beyond but less than 6 months	Remain overdue for 6 months or beyond but less than 18 months	Remain overdue for 18 months or beyond but less than 30 months	Remain overdue for 30 months or beyond	Remain overdue for 6 months
Demand Investment	From the following day of the expiry date	Remain overdue for 2 months or beyond but less than 6 months	Remain overdue for 6 months or beyond but less than 18 months	Remain overdue for 18 months or beyond but less than 30 months	Remain overdue for 30 months or beyond	Remain overdue for 6 months
Fixed Term Investment	After 6 months of installment due date	Remain **overdue** for 2 months or beyond but less than 6 months	Remain **overdue** for 6 months or beyond but less than 18 months	Remain **overdue** for 18 months or beyond but less than 30 months	Remain **overdue** for 30 months or beyond	Remain **overdue** for 6 months

Please be aware that, as per new BRPD Circular 03/2019, Term Investment facility will be treated as overdue/ classified on the basis of installment due date/ expiry date. i.e. If any installment or part of installment not paid within due date (date of payment) then overdue or classification status will be calculated from the installment due date/ expiry date.

We follow the following approach for specific and general allowances and statistical method:

Particulars		Short Term Agri. Investment	Consumer Financing				SMEF		Loans to BHs/MBS/SDs	All other investment
			Other than HF,LP, Credit Card	HF	LP	Credit Card	Cottage, Micro and Small	Medium		
UC	Standard	1.0%	2%	1%	2%	2%	0.25%	0.25%	1%	1%
	SMA	-	2%	1%	2%	2%	0.25%	0.25%	1%	1%
Classified	SS	5%	20%	20%	20%	20%	5%	20%	20%	20%
	DF	5%	50%	50%	50%	50%	20%	50%	50%	50%
	B/L	100%	100%	100%	100%	100%	100%	100%	100%	100%

Base for provision = Outstanding- (eligible security+ profit suspense) or 15% of outstanding whichever is higher

	****Discussion of the bank's investment (credit) risk management policy.**	Risk is inherent in all aspects of a commercial operation; however for Banks and financial institutions, investment (credit) risk is an essential factor that needs to be managed. Investment (credit) risk is the possibility that a borrower or counter party will fail to meet its obligations in accordance with agreed terms. Investment (Credit) risk, therefore, arises from the bank's dealings with or lending to corporate, individuals, and other banks or financial institutions. To manage investment (credit) risk EXIM bank follows "Bangladesh bank's Circulated CREDIT RISK MANAGEMENT guidelines".

Quantitative Disclosures:

b) Total Gross Investment (credit) risk exposures broken down by major types of Investment exposures:

BDT in crore

Sl	1. Exposure Type (Funded)	Exposure	RWA
1	Claims on Banks and NBFIs	695.75	141.68
2	Claims on Corporate	38,351.00	24,133.33
3	Claims under Credit Risk Mitigation	1,204.81	54.96
4	Claims categorized as retail portfolio & SME(excluding consumer loan)	4,262.32	3,101.62
5	Consumer finance	113.16	113.16
6	Claims fully secured by residential property	17.57	8.79
7	Claims fully secured by commercial real estate	778.97	778.97
8	Past Due Claims (Net of Specific Provision, when applicable)	1,235.99	1,517.09
9	Investment in equity and other regulatory capital instruments	1,143.95	1,429.94
10	Investments in premises, plant and equipment and all other fixed assets	582.44	582.44
11	Staff loan/Investment	250.39	50.08
12	Others	7,667.84	446.48
	Total	**56,304.19**	**32,358.55**

BDT in crore

Sl	2. Exposure Type (Non-Funded)	Exposure	RWA
1	Claims on Banks and other NBFIs:	7.37	1.47
2	Claims on Corporate	4,038.46	1,375.49
3	Claims against SME	312.20	180.90
4	Others	0.05	0.05
	Total	**4,358.08**	**1,557.91**

BDT in crore

Sl	1. Mode-wise Investment	Exposure
1	Bai-Muajjal	23766.73
2	Bai-Murabaha	1601.83
3	Bai-Salam	2516.19
4	Bai-Istisna	.00
5	Musharaka Investment	.00
6	Ijara Bil Baia (Commercial)	17488.97
7	Scheme Investment	75.29
8	Employee Investment	250.00
9	Quard	594.06
10	Islamic Investment (Cr.) Card	43.10
11	Musharaka Documentary Bill	224.25
12	Off-Shore Banking Unit	627.59
	Total	**47188.02**

c) Geographical distribution of Investment Exposures (broken down in significant areas by major types of Investment exposure)

BDT in crore

Sl.	Division-wise investment	Exposure
1	Dhaka	29785.14
2	Chittagong	13652.35
3	Khulna	835.97
4	Rajshahi	1823.29
5	Sylhet	155.76
6	Barisal	119.38
7	Rangpur	171.38
8	Mymensingh	644.75
	Total	**47188.02**

d) Industry or counterparty type distribution of Exposures, broken down by major types of Investment exposure

BDT in crore

Sl.	Industry-wise investment	Exposure
1	Garments	5 236.89
2	Construction	2 215.98
3	Agro-based Industry	4 795.84
4	Spinning	1 691.65
5	Textile, Dying & Print.	1 263.45
6	Fuel & Power	1 308.51
7	Transport & Communication	164.13
8	Trading and Others	30 511.57
	Total	**47 188.02**

e) Residual contractual maturity breakdown of the whole portfolio, broken down by major types of Investment exposure:

BDT in crore

Sl.	Item	Exposure
1	On demand	6624.10
2	Less than 3 months	2376.41
3	More than 3 months but less than 1 year	21456.76
4	More than 1year but less than 5 years	7301.28
5	More than 5 years	9429.46
	Total	**47 188.02**

f) By major industry or counterparty type:

Amount of impaired investment and if available, past due investment, provided separately

BDT in Crore

Economic Sector	Total Investment	Overdue
1. Agriculture	**610.15**	**15.01**
1a) Cultivation/Crop fin.	252.74	1.36
1b) Plantation	0.87	0.00
1c) Livestock	198.89	6.80
1d) Fishing/Pisciculture	127.06	6.13
1e) Others	30.58	0.72
2.Total Industry (Manufacturing) (IBB+WC)	**18 593.53**	**2 993.06**
2.1 Industry (Other than working capital)	**9 431.12**	**268.65**
a) Jute Industries	158.97	16.52
b) Garments	4 041.67	165.60

	c) Leather Industries	13.29	0.07	
	d) Spinning Mills	1 144.46	3.41	
	e) Textile	683.73	25.80	
	f) Weaving	11.76	0.00	
	g) Food Processing	264.99	0.15	
	h) Edible Oil Refiner	945.85	0.00	
	i) Rice/Flower/Puls Mills	93.40	3.90	
	j) Steel Engineering &Metallic Product	441.82	25.96	
	k) Bricks & Sand Factories	44.32	6.59	
	l) Paper & Paper Product	354.54	4.83	
	m) Gas/ Electricity/Power Gen Comp.	145.74	0.00	
	n) Ship Building	4.76	0.00	
	o) Ship Breaking	23.31	0.00	
	p) Others	1 058.49	15.80	
	2.2. Industry (Working Capital)	**9 162.42**	**2 724.41**	
	a) Jute Industries	90.14	3.67	
	b) Garments	1 195.22	377.07	
	c) Leather Industries	30.86	0.00	
	d) Spinning Mills	547.20	37.79	
	e) Textile & Weaving	298.04	64.04	
	f) Weaving	22.92	0.01	
	g) Food Processing	77.13	3.17	
	h) Edible Oil Refiner	1 798.57	108.35	
	i) Rice/Flower/Puls Mills	1 056.11	189.01	
	j) Steel Engineering &Metallic Product	1 330.41	893.79	
	k) Bricks & Sand Factories	123.54	52.91	
	l) Paper & Paper Product	276.57	11.23	
	m) Gas/ Electricity/Power Gen Comp.	1 162.77	750.83	
	n) Ship Building and Ship Breaking	254.60	0.00	
	o) Ship Breaking	0.00	0.00	
	p) Others	898.35	232.54	
	3. Export Financing	**4 469.15**	**407.47**	
	a) Readymade Garments	2 607.35	295.22	
	b) Textile & Weaving	164.88	0.00	
	c) Spinning Mills	169.89	0.00	
	d) Jute	0.00	0.00	
	e) Jute Goods	0.00	0.00	
	f) Leather	0.00	0.00	
	g) Others	35.20	0.00	
	h) EDF	1 491.83	112.26	
	4. Import Financing	**594.52**	**191.65**	
	a) Food Stuffs	10.25	0.00	
	b) Edible Oil Refiner	146.39	84.66	
	c) Garments	10.57	9.83	
	d) Spinning Mills	40.46	0.00	
	e) Textile & Weaving	1.77	0.00	
	f) Chemical (Except Medicine)	0.24	0.00	
	g) Others	384.84	97.16	
	5. Internal Trade Financing	**10 330.57**	**2 662.62**	
	a) Whole Sale Trading	8 704.06	2 554.06	
	b) Retail Trading	1 602.92	106.00	
	c) Others	23.58	2.56	
	6. Financial Institutions	**130.94**	**9.04**	
	a) NBFI	123.58	9.04	
	b) NGO/ Micro Credit	5.46	0.00	
	c) Insurance Company	1.91	0.00	

d) Others	0.00	0.00
7. Transport and Communications	**164.13**	**2.86**
a) Road Transport	1.80	0.00
b) Water Transport	5.43	0.00
c) Air Transport	0.00	0.00
d) Others	154.33	0.29
e) Tele-Communication	2.57	2.57
8.Housing & Construction Co.	**5 677.05**	**245.90**
a) Housing Companies	2 755.08	137.83
b) Construction Companies	2 215.98	101.92
c) Urban	23.85	3.41
d) Rural	6.28	1.10
e) Others	675.86	1.64
9.Others	**6 617.98**	**859.38**
Total:	**47 188.02**	**7 141.08**

- **Specific and general provisions**

BDT in crore

Provision required:	**Provisions as on 31.12.2023**
Unclassified Investments	570.73
Special mention accounts (SMA)	7.12
Sub total	**577.85**
Substandard	26.89
Doubtful	45.37
Bad/Loss	675.2
Sub total	**747.68**
Total	**1325.53**

*** **Provision for off-balance sheet item-** **BDT 98.52 crore**
*** **Provision for Offshore Banking Unit (OBU)-** **BDT 6.28 crore**

Charges for specific allowances and charges-offs during the period:

*** **Charges for specific allowances-BDT 699.89 crore**
*** **Charge-offs on Investment during the period BDT 144.83 crore**

g. NPAs

BDT in crore

*****Gross Non Performing Assets (NPAs)**	1719.66
*****Non Performing Assets (NPAs) to Outstanding Investment**	3.64%

*****Movement of Non- Performing Assets (NPAs)**

BDT in crore

Opening Balance	**1744.64**
Additions	483.09
Reductions	508.07
Closing Balance as on 31.12.2023	**1 719.66**

*****Movement of provision for Non-Performing Assets (NPAs)**

BDT in crore

Opening Balance	855.92
Provisions made during the period	24.68
Write-Off/Waived	(135.77)
Recoveries of amount previously written off	2.85
Write-Back of excess provisions	0.00
Closing Balance 31.12.2023	**747.68**

E) Equities: Disclosures for Banking Book Positions

Qualitative Disclosures

a)	**The general qualitative disclosures requirement with respect to equity risk, including**	
	Differentiation between holdings on which capital gains are expected and those taken under other objectives including for relationship and strategic reasons;	Investment of EXIM Bank in equities is divided into two categories: i) quoted equities (which are traded in the secondary market) and ii) unquoted equities (which are not traded in the secondary market). Since the intent of holding unquoted equities is not trading, the same are considered as banking book equity exposure.
	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	The banking book equity exposure is mainly held for strategic purpose. EXIM Bank has 03 (Three) subsidiary companies namely; i) EXIM Exchange Company (UK) Limited, ii) EXIM Finance (Hong Kong) Limited and iii) EXIM Islami Investment Limited, which are held for strategic business reason. The banking book securities are shown at cost price and market value determined by netting off the impairment loss and no revaluation reserve has been created against these equities.

Quantitative Disclosures:

		BDT in crore
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.	**See: Table 1**
c)	The cumulative realized gains (losses)	There are no realized gains (losses) against banking book equities.
d)	• Total unrealized gains (losses)	There are no unrealized gains (losses) against banking book equities.
	• Total latent revaluation gains (losses)	Nil
	• Any amounts of the above included in Tier 2 capital.	Nil
e)	Capital requirements broken down by appropriate equity groupings, consistent with the bank's methodology, as well as the aggregate amounts and the type of equity investments subject to any supervisory provisions regarding regulatory capital requirements	Minimum capital requirement on banking book equities has been BDT 143.00 Crore, calculated by giving 125% risk weight

Table 1: The list of banking book equities held by the Bank is given below:

Fig. in BDT

Sl	Equities in Banking Book	Purchase price	Market Value at 31 Dec' 23	Remarks
1.	Central Depository Bangladesh Limited	1,40,51,038	1,40,51,038	Unquoted
2.	EXIM Exchange Company (UK) Limited	5,20,98,416	5,20,98,416	Unquoted
3.	EXIM Finance (Hong Kong) Limited	8,39,28,390	8,39,28,390	Unquoted
4.	EXIM Islami Investment Limited (EIIL)	199,99,00,000	199,99,00,000	Unquoted
5.	SWIFT	1,18,56,869	1,18,56,869	Unquoted
6.	Mudaraba Subordinated Bond	605,00,00,000	605,00,00,000	Unquoted
7.	Mudaraba Perpetual Bond	322,76,65,000	322,76,65,000	Unquoted
	Total	**1143,94,99,713**	**1143,94,99,713**	

F) Profit Rate Risk in Banking Book (PRRBB)

Qualitative Disclosure:

a)	The general qualitative disclosure requirement including the nature of PRRBB and key assumptions, including assumptions regarding investment prepayments and behavior of non-maturity deposits, and frequency of PRRBB measurement.	Profit Rate Risk in Banking Book (PRRBB) refers to the current or probable risk to a Bank's capital and earnings arising from unpleasant movements in profit rates that affect banking book positions (i.e. the present value and timing of future cash flows). Profit rate change affects the value of both the On Balance Sheet and the Off Balance Sheet position of the Bank. Both the current earnings (earnings perspective) as well as the net worth of the Bank (economic value perspective) are negatively affected for changing profit rates. The profit rate risk is assessed by the Bank both in earning and economic value perspective. EXIM Bank considers both the short-term and long-term perspectives to identify the risks associated with changing PRRBB on their on-balance sheet and off-balance sheet exposures. In short term, changes in profit rates impact the Bank's Net Investment Income (NII) and in a longer term, it impacts the cash flows on the assets, liabilities and off-balance sheet items that may rise to a risk to the net worth of the Bank arising out of all re-pricing mismatches and other profit rate sensitive position.

Quantitative Disclosures:

As on December 31, 2023 (BDT in crore)

		Particulars	1-90 days	Over 3 months to 6 months	Over 6 months to 1 months
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 PRRBB, broken down by currency (as relevant)	Rate Sensitive Assets	11,522.77	5,850.69	14,191.04
		Rate Sensitive Liabilities	21,348.78	6,419.02	8,319.05
		GAP	(9,826.01)	(568.33)	5,871.99
		Cumulative Gap	(9,826.01)	(10,394.34)	(4,522.37)
		Adjusted profit rate changes	1%	2%	3%
		Net Investment impact	(45.22)	(90.45)	(135.67)
		Re-pricing impact	(8.78)	(17.55)	(26.33)

G) Market Risk	
a) Qualitative Disclosures:	
Views of Board of Directors on trading/ investment activities:	Market risk is defined as the possibility of losses in on and off-balance sheet positions arising from movements in market prices. The exposure of the bank to market risk arises principally from customer-driven transactions. The market risk positions subject to this requirement are: i) The risks pertaining to profit rate related instruments and equities in the trading book. ii) Foreign exchange risk and commodities risk throughout the bank (both in the banking and in the trading book). Trading book comprises position in financial instruments held with trading intent or in order to hedge other element of the trading book. The portfolio of investment of EXIM Bank includes Bangladesh Government Islamic Investment Bond (BGIIB), Bangladesh Government Investment Sukuk (BGIS), Share of listed public limited companies etc. The bank has always put impetus on investment of funds in high yield areas and also has ensured maintenance of statutory liquidity requirement as set by Bangladesh Bank. The Board of Director approves all necessary policies related to market risk and review them on regular basis.
Methods used to measure Market risk:	There are several methods use to measure market risk and the bank uses those methods which deem fit for a particular scenario. For measuring profit risk from earnings perspective, the bank uses maturity gap analysis, Duration Gap analysis, and mark to market method and for measuring foreign exchange risk, the bank uses VaR analysis. The Bank uses standardized method for calculating capital charge against market risks for minimum capital requirement of the Bank under Basel-III.
Market Risk Management system:	The Treasury & Financial Institution Division manage market risk covering Liquidity, profit 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 & CEO of the Bank. ALCO meets at least once in a month.
Policies and processes for mitigating market risk:	The bank has put its Asset Liability Management policy by setting various risk limits for effective management of market risk and ensuring that the operations are in line with bank's expectation of return to market risk through proper Asset Liability Management. The policies also deal with the reporting framework for effective monitoring of market risk. The ALM Policy specifically deals with liquidity risk management and profit rate risk management framework. Liquidity risk is managed through Gap & Duration analysis, based on residual maturity/behavioral pattern of assets and liabilities, as prescribed by the Bangladesh Bank. The Bank has put in place mechanism of Liquidity Contingency Plan. Prudential (Tolerance) limits are prescribed for different residual maturity time buckets for efficient Asset Liability Management. Liquidity profile of the Bank is evaluated through various liquidity ratios/indicators.

	Foreign Exchange risk is the risk or chance of loss due to unexpected movement of market price of the currencies of different countries or the price of the assets denominated by foreign currencies. For effective and efficient management of Foreign Exchange Risk, the Bank has a well-developed and well-structured Foreign Exchange Risk Manual and an international standard Dealing Room Manual. Various limits are set to monitor and mitigate the Foreign Exchange risk such as, Net Open Position (NOP) limits (Day limit / Overnight limit), deal-wise cut-loss limits, Stop-loss limit, Profit / Loss in respect of cross currency trading etc. and exception reporting is regularly carried out. The Treasury of the Bank is mainly divided into three departments namely Front Office, Mid Office and Back Office. The Front Office independently conducts the transactions and the Back Office is responsible for settlement of those transactions after verifying of the deals and passing for those entries in the books of account. The Mid Office plays a vital role in the process by checking the Foreign Exchange procedure perform by Front and Back Office and by reporting it directly to the Managing Director & CEO of the Bank. All foreign exchange transactions are revaluated at Mark to Market rate as determined by inter-bank. All Nostro accounts are reconciled on monthly basis and outstanding entries are reviewed by the management for their timely settlement.

b) Quantitative Disclosures:

BDT in crore

The Capital Requirements for:	**Total Capital Charge**
Profit Rate Related Instruments	-
Equities a) Specific Risk - Market value of investment in equities BDT 347.78 Crore. Capital Charge at 10% of market value amounting BDT 34.78 Crore. b) General Market Risk -Market value of investment in equities BDT 347.78 Crore. Capital Charge at 10% of market value amounting BDT 34.78 Crore.	**69.56**
Foreign Exchange Position (Capital Charge at 10% on Sum of Net Short Position amounting BDT 124.47 Crore)	**124.47**
Total	**194.03**

H) Operational Risk

a) Qualitative Disclosures

Views of Board of Directors on system to reduce Operational Risk:	Operational Risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. It is inherent in all of the Bank's activities. Operational risks are monitored, controlled (to the extent possible) and mitigated by the bank. The Bank's approach to operational risk is not designed to eliminate risk altogether but rather, to contain risks within levels deemed acceptable by senior management. All functions, whether business, control or logistics functions, must manage the operational risks that arise from their activities. This is supported by an independent program of periodic reviews undertaken by internal audit, and by monitoring external operational risks events, which ensure that the group stays in line which industry best practice and takes account or lessons from publicized operational failures within the financial services industry.
Performance gap of executives and staffs:	EXIM Bank mitigates the performance gap of executives and staffs by bridging their knowledge gap and making them acquaintances with the process & policies of the bank through proper training which includes on-job and off-job training, seminars and conferences related to skill development, job rotation, study circles and time to time counseling. Simultaneously, the bank motivates its employees in minimizing their own performance gap by ensuring friendly & decent environment in its workplace, equal opportunity & fair treatment, establishing ethical behavior by following standard code of conduct and above all providing competitive pay packages & benefits.
Potential external events:	The potential external events that may pose the bank into operational risks are as follows. 1. **External Fraud**: Acts by a third party, of a type intended to defraud, misappropriate property or circumvent the law. Examples include robbery, forgery, and damage from computer hacking. 2. **Taxation Risk**: Sudden changes in tax laws and regulation that hamper the profitability of a bank. 3. **Legal Risk**: Legal risk is the risk of the Bank's losses in cases of i) incompliance of the Bank with the requirements of the legal regulations ii) making legal mistakes in carrying out activities iii) Imperfection of the legal system iv) Violation of legal regulations, terms and conditions of concluded agreements by the counterparties. 4. **Damage of physical asset**: Loss or damage to physical assets from natural disaster or other events. Example includes terrorism, vandalism, earthquakes, fires, floods etc.

	5. **Business disruption and system failures**: Disruption of business or system failures. Examples include telecommunication problems, utility outages etc. 6. **Execution, delivery and process management**: Failed transaction processing or process management, and relations with trade counterparties and vendors. Examples include, non-client counterparty mis-performance, vendor disputes etc.
Policies and processes for mitigating operational risk:	The Bank has taken the following policies and processes for mitigating operational risk: 1. Loss prevention: The bank focuses on employee development through training and development programs and reviews the performance of employees to prevent loss. 2. Loss control: The bank has the detail planning and defined process in place like back up of computer system controlling the loss. The 'Risk Management Division' under 'Chief Risk Officer' of the bank review and update operational risks along with all other core risks on systematic basis as essential ensuring that adequate controls exist and that the related returns reflect these risks and the capital allocated to support them. The bank has a strong information systems/MIS inflow and data management capabilities to support the risk management functions of the bank. The Bank has taken initiatives for protecting the information from unauthorized access, modification, disclosure and destruction to protect its' customers' interest. The Bank has ICT policies for various operation and services, which are closely in line with the ICT Guidelines of Bangladesh Bank. Training is a key component of operational risk management. The Bank has been continuously conducting training sessions (regarding Operational Procedure, Business Continuity Planning, Disaster Recovery Planning etc.) for relevant employees. The Bank has been maintaining separate insurance coverage for its critical assets. It conducts routine audit (both internal and external) and internal ICT audit to all its' branches and Head Office divisions.
Approach for calculating capital charge for operational risk:	The Banks operating in Bangladesh have been computing the capital requirements for operational risk under the Basic Indicator Approach (BIA). Under BIA, the capital charge for operational risk is a fixed percentage, denoted by α (alpha) of average positive annual gross income of the bank over the past three years. Figures for any year in which annual gross income is negative or zero, should be excluded from both the numerator and denominator when calculating the average. The capital charge may be expressed

	as follows: $K = [(GI\ 1 + GI\ 2 + GI\ 3) \times \alpha]/n$ Where- K = the capital charge under the Basic Indicator Approach GI = only positive annual gross income over the previous three years (i.e., negative or zero gross income if any, shall be excluded) α = 15 percent n = number of the previous three years for which gross income is positive. Gross Income (GI) is defined as "Net Investment Income" plus "Net non-Investment Income". It is intended that this measure should: i). be gross of any provisions; ii). be gross of operating expenses, including fees paid to outsourcing service providers iii). exclude realized profits/losses from the sale of securities held to maturity in the banking book; iv). exclude extraordinary or irregular items; v). exclude income derived from insurance.

b) **Quantitative Disclosures:**

BDT in crore

The capital requirements for operational risk	**215.53**

<u>Capital Charge for Operational Risk-Basic Indicator Approach</u>

BDT in Crore

Year	Gross Income (GI)	Average Gross Income (AGI)	Capital Charge = 15% of AGI
01	1,534.25	1436.89	215.53
02	1,478.04		
03	1,298.37		

I) Liquidity Ratio

a) Qualitative Disclosures

Views of BOD on system to reduce Liquidity Risk	Liquidity risk is the risk which arises either from the bank's inability to meet its obligations as they fall due or to fund increases in assets without incurring unacceptable cost or losses. The Board of Directors (BOD) considered liquidity risk as a significant risk for a bank. The BOD approves various policies under the guideline of Bangladesh Bank to manage liquidity risk and approves tolerance limit for various liquidity risk indicators. They also review these and take necessary action on regular basis.
Methods used to measure Liquidity Risk:	We measure liquidity risk by checking status and trend of various internal and external liquidity indicators like CRR/SLR surplus, Investment Deposit Ratio (ID Ratio), Liquidity Coverage Ratio (LCR), Net Stable Funding Ratio (NSFR), Maximum Cumulative Outflow (MCO), bucket-wise gap between assets and liabilities, national and global economic and political status and outlook etc. We also keep an eye on the market dynamics to trace any unforeseen liquidity risk. We perform gap analysis between deposit and investment to forecast need for liquid assets. If the gaps in various time bands are beyond prescribed limit or if the liquidity indicators exceed limit, we consider that as an indication of liquidity risk. We regularly observe updates in economic, political and market conditions both home and abroad. We regularly survey deposit rates of peer banks. We also perform various other analyses like sensitivity analysis, gap between rate sensitive assets and liabilities, size wise, rate wise-category wise, rate wise-product wise analysis of deposits and investments etc.
Liquidity Risk management system:	We have necessary organizational structure, systems, policies and procedures for managing liquidity risk of our bank. We have a separate division named as "Treasury & Financial Institutions Division (TFID)" major task of which is to manage Asset Liability Management (ALM) risk i.e., liquidity risk and profit rate risk. We have Asset and Liability Management Committee (ALCO) formed in line with Bangladesh Bank guidelines. There is a separate and well staffed ALM Desk in TFID under direct supervision of ALCO. The ALCO sits at least once in a month and regularly reviews various ALM risk indicators as presented through ALCO Papers. Day to day liquidity is managed based on considering inflow/outflow through Bangladesh Automated Clearing House (BACH), BEFTN, RTGS. We use asset conversion method, borrowed liquidity method or mixed method in managing liquidity considering their relative cost and benefit. If there is surplus fund, we place our fund with other shariah based banks and Financial Institutions (FIs) or return interbank deposit. On the other hand, if there is

Policies and processes for mitigating Liquidity Risk:	shortfall, we take interbank deposit for short term or withdraw our fund with other banks and FIs. If gaps in the buckets in the maturity profile exceed limit, we change provisional rate of our deposit products in such a way so that, deposits move from surplus buckets to deficit buckets. We have an ALM guideline rich in contents, liquidity management policy, transfer pricing policy, profit rate policy, Management Action Trigger (MAT), wholesale borrowing and funding guidelines (WBFG), Contingency Funding Plan (CFP),policy regarding getting clearance about availability of fund from treasury before sanctioning new facilities etc which are reviewed at least annually. We try to keep CRR surplus as low as possible but not below a minimum amount as approved by the Board and Bangladesh Bank requirement. This is done for mitigating the risk of being unable to maintain CRR at any time. Our board has approves limits of key liquidity indicators. We take information about large fund flows from branches and concerned divisions of head office so that we can avoid any unforeseen liquidity pressure and meet any fund requirement using low cost source or place idle fund with other banks and FIs. We monitor the liquidity indicators regularly and take immediate actions if any unforeseen risk is detected.

b) Quantitative Disclosures:

BDT in Crore

Liquidity Coverage Ratio	**114.43%**
Net Stable Funding Ratio (NSFR)	**105.03%**
Stock of High quality liquid assets	**5,744.45**
Total net cash outflows over the next 30 calendar days	**5,019.88**
Available amount of stable funding	**45,567.95**
Required amount of stable funding	**43,385.00**

J) Leverage Ratio

a) Qualitative Disclosures

Views of BOD on system to reduce excessive leverage:	To avoid the building up excessive leverage while apparently maintaining strong risk-based capital ratios, the banking sector was forced to reduce its leverage in a manner that not only amplified downward pressure on asset prices, but also intensified the positive feedback loop between losses, declines in bank capital and reduction in credit availability. In order to avoid building-up excessive on- and off-balance sheet leverage the board of directors of the bank prefer a simple, transparent, non-risk based leverage ratio which is calibrated to act as a credible supplementary measure to the risk based capital requirements.
Policies and processes for managing excessive on and off balance sheet leverage:	The leverage ratio is intended to manage through following manner: a) Constant quarterly monitoring of the build-up of leverage in the bank by the Treasury Division and Investment Risk Management Division. b) Strengthen the risk based requirements through branch level as well as Head office.
Approach for calculating exposure:	The Bank has calculated the regulatory leverage ratio as per the guideline of Basel III. The numerator, capital measure is calculated using the new definition capital applicable from 01 January 2016. The denominator, exposure measure, is calculated on the basis of the Basel III leverage ratio framework as adopted by the Bangladesh Bank. The exposure measure generally follows the accounting value, adjusted as follows: - a) On-balance sheet, i. non derivative exposures are included in the exposure measure after netting of specific provision; ii. physical or financial collateral is not considered to reduce on-balance sheet exposure; iii. Investments are not netted with deposits; c) Off balance sheet items are converted into credit exposure equivalents through the use of credit conversion factors (CCFs). Depending on the risk category of the exposure a CCF of 0%, 50% or 100% is applied. Commitments that are unconditionally cancellable at any time by the bank without prior notice, a CCF of 0% is applied; The banks maintains leverage ratio on quarterly basis. The calculation at the end of each calendar quarter to be submitted to BB based on the following definition of capital and total exposure. $$\text{Leverage Ratio} = \frac{\text{Tier 1 Capital (after related deductions)}}{\text{Total Exposure (after related deductions)}}$$

b) Quantitative Disclosures:

BDT in Crore

Sl. No.	Particulars	Solo	Consolidated
1	Leverage Ratio	6.21%	6.29%
	On balance sheet exposure	56,869.21	56,932.99
3	Off balance sheet exposure	4,459.23	4,459.23
4	Regulatory adjustment made to Tier I capital	-	-
5	Tier I capital. (Considering all regulatory adjustment)	3,808.55	3,863.60
6	Total exposure = { (2+3) - 4)}	61,328.44	61,392.22

K) Remuneration:	
Qualitative Disclosures:	
a) Information relating to the bodies that oversee remuneration: The qualitative remuneration information disclosed below are broader in scope and cover all individuals included in the Remuneration Policy of Export Import Bank of Bangladesh Limited; whereas the quantitative information relates to senior managers and material risk takers of the bank and its subsidiaries.	
i) Name, composition and mandate of the main body overseeing remuneration.	The remuneration issues in EXIM Bank are overseen by a six-member Remuneration Committee. It comprises the Managing Director & CEO, two Additional Managing Directors, two Deputy Managing Directors and the Head of HR. The primary functions of the Remuneration Committee are to determine, review and propose principles and governance framework for all decisions relating to remunerations of the employees of EXIM Bank. While the Human Resources Division is responsible for preparing and recommending reward plans and compensation, the committee's duties are to assess and review these recommendations and submit them to the Board of Directors for approval.
ii) External consultants whose advice has been sought, the body by which they were commissioned, and in what areas of the remuneration process.	Currently, there is no external remuneration consultant, whose advice is being sought. The Committee obtains remuneration information directly from the Human Resources Division of the bank.
iii) A description of the scope of the bank's remuneration policy (e.g. by regions, business lines), including the extent to which it is applicable to foreign subsidiaries and branches.	Our remuneration policy provides guiding principles that drive remuneration related decision-making across every level of our bank, including its one local and two foreign subsidiaries.
iv) A description of the types of employees considered as material risk takers and as senior managers, including the number of employees in each group.	The bank has identified employees in key areas and functions whose impact on the risk profile of the bank will always be material, and also employees with the authority to take risks above thresholds that are defined based on the institution's capital figures. The bank has also set out criteria to identify staff in control and other functions, including the members of the management body in its supervisory function, whose professional activities have a material impact on the institution's risk profile because of their responsibilities, e.g. for managing risks or developing or overseeing the institution's strategy. Other criteria are based on the authority of staff to commit to investment risk exposures

<table>
<tr><td></td><td>and market risk transactions above certain thresholds. In particular, all members of the senior management, Divisional Heads, Regional Managers and Branch Managers have been identified as senior managers and/or material risk takers. The number of employees in each group is as follows-

<table><tr><th>Senior Manager</th><th>Material Risk Taker</th></tr><tr><td>5</td><td>174</td></tr></table></td></tr>
<tr><td colspan="2">b) Information relating to the design and structure of remuneration processes.</td></tr>
<tr><td>i) An overview of the key features and objectives of remuneration policy.</td><td>EXIM Bank is committed to maintain fair, balanced, performance-oriented compensation practices that align with long-term employee and shareholder interests. The bank believes in rewarding employees for performing in a way that creates sustainable values for the bank and its shareholders over the time. We believe that well-established and clearly communicated core remuneration values drive fairness and consistency across our bank.</td></tr>
<tr><td>ii) 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.</td><td>The committee reviewed the bank's remuneration policy in the 2023 financial year and brought no change in the policy.</td></tr>
<tr><td>iii) A discussion of how the bank ensures that risk and compliance employees are remunerated independently of the businesses they oversee</td><td>Employees engaged in control functions (risk management, human resources, audit, compliance, etc.) are independent from the business units they oversee, have appropriate authority, and are compensated in accordance with the achievement of the objectives linked to their functions, independent of the performance of the business areas they control.</td></tr>
</table>

c) Description of the ways in which current and future risks are taken into account in the remuneration processes.	
i) An overview of the key risks that the bank takes into account when implementing remuneration measures.	All of our remuneration practices are carefully managed within the risk taking capacity of the bank. The key risks like- Financial Risks, Operational Risks, Compliance Risks, Reputational Risks, and Employee Turnover Risks; etc. are taken into account for managing and determining remuneration arrangements.
ii) 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).	Risk is a key factor in assessing remuneration outcomes. In this regard, we use financial capacity of the bank to measure remuneration packages. Side by side, we also consider operational impacts, cost of living adjustments, relevant compliances, industry-competitive remuneration in relation to the market reputation and other effective risk-adjusted measures in determining remuneration.
iii) A discussion of the ways in which these measures affect remuneration.	We approach all of our remuneration arrangements, especially the periodic fixed remuneration enhancements and the variable compensation arrangements through an integrated risk, finance, compensation and performance management frame work. All annual base salary increments and potential variable remuneration awards are reviewed at the end of each financial year and may be adjusted downwards where material risk issues occur.
iv) A discussion of how the nature and type of these measures has changed over the past year and reasons for the change, as well as the impact of changes on remuneration.	The management of the bank has been considering the reasonable grounds for amending and measuring the remuneration arrangements from time to time in order to ensure risk adjusted business operations and employee satisfaction simultaneously.

d) Description of the ways in which the bank seeks to link performance during a performance measurement period with levels of remuneration.	
i) An overview of main performance metrics for bank, top-level business lines and individuals.	• Revenue per employee; • Risk-adjusted net profit margin; • The ability to generate fee income; • Investment quality. • Return on equity • Return on assets • Efficiency ratio • Non performing investment ratio • Investment Deposit ratio • Cost of fund • Book value per share
ii) A discussion of how amounts of individual remuneration are linked to bank-wide and individual performance.	In EXIM Bank, amounts of individual remuneration do not contain any direct formulaic link between business income and individual reward. Differentiating performance and value ratings at all levels enable us to target spend towards those who have made the most effective contribution to the bank's performance and unique culture, recognizes and aids retention of our highest performers and balances this with affordability considerations.
iii) A discussion of the measures the bank will in general implement to adjust remuneration in the event that performance metrics are weak	Risk measures are used as a gate opener for any performance based remuneration. Remuneration outcomes are assessed against individual performance (against business goals set at the beginning of the performance year) and bank's risk taking capacity. All potential incentive awards are reviewed at the end of financial year and may be reduced or adjusted to zero in the event of any risk management issues.

e) Description of the ways in which the bank seek to adjust remuneration to take account of longer-term performance.	
i) 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.	Currently we do not offer any variable remuneration that may be deferred or vested either in the form of cash, shares or share-linked instruments. However, employees are eligible for variable remuneration arrangements in the form of Incentive Bonus (non-deferred cash awards), applicable to their positions.

ii) A discussion of the bank's policy and criteria for adjusting deferred remuneration before vesting and (if permitted by national law) after vesting through claw back arrangements.	Not applicable.

f) Description of the different forms of variable remuneration that the bank utilizes and the rationale for using these different forms.	
i) An overview of the forms of variable remuneration offered, i.e. cash, shares and share-linked instruments and other forms.	The structure of remuneration arrangements for all employees primarily consists of a fixed remuneration component, which is made up of base salary, allowances, and other benefits. Employees are also eligible for variable remuneration arrangements applicable to their position. Variable remuneration consists of Incentive Bonus (cash awards) for most of our employees.
ii) 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.	Incentive Bonus awards are discretionary and recognize annual performance over the immediate past financial year. Performance is measured and reviewed against set goals, which include financial and non-financial metrics.

Quantitative Disclosure			
g)	Number of meetings held by the main body overseeing remuneration during the disclosures during the financial year and remuneration paid to its member.	The Remuneration Committee holds at least three meetings per annum. Additional meetings may be held as deemed necessary by the committee. The committee met three times during the 2023 financial year. The members do not receive any remuneration as committee member.	
h)	**Disclosure Category**	**Senior Managers**	**Material Risk Takers**
	Number of employees having received a variable remuneration award during the financial year.	5	174
	Number and total amount of guaranteed bonuses awarded during the financial year.	41,59,900/- (2 festival bonuses)	4,41,22,402/- (2 festival bonuses)

	Number and total amount of sign-on awards made during the financial year.		-		-	
	Number of severance payments made during the financial year.		4		8	
	Total amount of severance payments made during the financial year.		3,37,83,745/-		12,11,92,293/-	
i)	Total amount of outstanding deferred remuneration, split into cash, shares and share-linked instruments and other forms.		Not applicable.			
	Total amount of deferred remuneration paid out in the financial year.		Not applicable.			
j)	Disclosure Category		Senior Managers		Material Risk Takers	
			Deferred	Non-deferred	Deferred	Non-deferred
	Fixed Remuneration	Cash-based	-	4,43,41,650/-	-	56,62,45,121/-
		Shares and share-linked instruments	-	-	-	-
		Others	-	-	-	-
	Variable Remuneration	Cash-based	-	-	-	-
		Shares and share-linked instruments	-	-	-	-
		Others	-	-	-	-
k)	Quantitative information about employees' exposure to implicit (e.g. fluctuations in the value of shares or performance units) and explicit adjustments (e.g. malus, claw backs or similar reversals or downward revaluations of 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.		Not applicable.			
	Total amount of reductions during the financial year due to ex post explicit adjustments.		Not applicable.			
	Total amount of reductions during the financial year due to ex post implicit adjustments.		Not applicable.			