

Implementation of Basel Accords in Bangladesh

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To our parents

PREFACE

Despite very significant discussions in the literature on the effectiveness of Basel Accords for enhancing the resilience of internationally active banks, less has been done to investigate the universal applicability of Basel Accords to local banks particularly in developing countries. As a matter of facts, Bangladesh, one of the least developed countries has introduced the Basel-type ‘capital to risk-weighted assets based approach’ for assessing the capital adequacy of banks, having abandoned the ‘capital to liabilities approach’ in 1996 and formally introduced the Basel Accords II and III in 2009 and 2015, respectively. The chief objective of the introduction of the Basel Accords in Bangladesh was to bring its financial stability and make its bank capital more shock absorbent. However, during our investigated period of 2009–2018, the banking industry has accumulated huge non-performing loans which eroded its profitability. This adverse effect was the motivation of writing this book, partly because the first author was in the financial instability in Bangladesh as a bank staff.

The book has nine chapters which can be categorized into three tracts. First tract (chapter 2 and 3) deals with the historical and theoretical issues on Basel Accords, banking theories and academic debate on banking regulations. The second tract (chapter 4 to chapter 7) offers a comprehensive discussion on the Bangladeshi regulations on external credit assessment institutions (ECAIs), subordinated debt and cases on bank distress in Bangladesh. The third tract (Chapter 8 and 9) offers a set of pragmatic way out to the decision makers to build a resilience capital regulation and

reaping the potential benefits from implementation of Basel Accords in Bangladesh, summary of the entire study and future research issues.

This book challenges the conventional explanations of Bangladeshi financial instability and suggests a different set of failures that affected the Bangladeshi banking system. In this book, we analyze a funding and liability structure of Bangladeshi banks; to maintain the minimum capital adequacy ratio, Bangladeshi private commercial banks were forced to tap into subordinated debts (sub-debt) as Tier 2 capital on the one hand, and the bulk of public money was injected constantly to recapitalize the state-owned commercial banks on the other hand. This practice in funding in this decade (2009–2018) undermined the banking resilience and increased the systemic risk of the financial system. In fact, Bangladeshi banks were not able to build sustainable retained earnings due partly to the loan loss provisioning and the payout pressure of cash dividends to their equity holders. We shed an analytical light on the ill-by-product of Basel Accords such that the banks tend to increase sub-debt as Tier 2 capital just to maintain the minimum capital to risk-weighted assets ratio (CRAR). In this book, we also analyze that the naïve and excess reliance on ECAIs' credit rating in the process of adopting the Basel-type capital adequacy amounted to a risky strategy for the Bangladeshi banking industry. As an endorsement for our discussions, we raise several cases of bank distresses for understanding the Bangladeshi banking sector malaise from the Basel Accord perspective. We believe that this book will contribute to further discussions on the possible ill-by-product of the internationally standardized Accords which do not necessarily have the universal applicability.

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CONTENTS

1	Introduction	1
2	BIS and the Basel Accord: Looking Back at History	13
3	Theoretical Discussion on Banking Business Model and Banking Regulations	35
4	Basel Accord Associated Institutions in Bangladesh	73
5	Incentive: The Missing Pillar in the ECAIS Institutions	105
6	Subordinated Debt: A Skeptical Component of Regulatory Capital	123
7	Cases of Bank Distress	157
8	The Building Blocks to Design Robust and Effective Capital Regulation	173
9	Conclusion	187
	Annexures	197
	Appendix: History of CRAs in the US and Regulatory References of Their Rating Notch by the US Regulators	205

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ABBREVIATIONS

ALCO	Asset and liability management committee
BB	Bangladesh bank
BDT	Bangladesh taka
BIS	Bank for international settlements
BSEC	Bangladesh securities and exchange commission
CRAR	Capital to risk-weighted assets ratio
CRAs	Credit rating agencies
CRC	Credit rating company
ECAIs	External credit assessment institutions
IRB	Internal ratings-based approach for credit risk
NPL	Non-performing loans
ROA	Return on assets
ROE	Return on equity
RWA	Risk-weighted assets
SA	Standardised approach for credit risk
Sub-debt	Subordinated debt
USD	United States Dollar

LIST OF FIGURES

Fig. 1.1	Comparisons of CRAR among major South Asian Economies between 2009 and 2018 (<i>Source</i> IMF, Financial Soundness Indicators (FSIs). Retrieved on 26 June 2020)	3
Fig. 2.1	Conceptual Framework of Basel Accord	29
Fig. 4.1	Objectives of ECAIs rating in Basel framework	79
Fig. 4.2	Trend of corporate exposure rating and total NPL during 2010–2018 (prepared by authors from the Financial Stability Report, 2010–2018)	90
Fig. 5.1	Statutory organizational structure of ECAIs related with rating in Bangladesh	108
Fig. 5.2	ECAIs exposure rating process in Bangladesh	110
Fig. 5.3	Relationship with firm, ECAI, regulators and bank while exposure rating	117
Fig. 6.1	Banking sector NPL (in BDT billion) (<i>Source</i> BB Financial Stability Reports)	128
Fig. 6.2	Average dividend rate of PCBs between 2009 and 2018 (<i>Source</i> Computed by the author based on 29 PCBs Annual Report on various years)	128
Fig. 7.1	Sponsors shareholding structure of FBL as of December 31, 2013	158
Fig. 7.2	Impact of ABBL's NPL on capital	163
Fig. 7.3	High NPL adversely affect the bank's ROA	166
Fig. 7.4	Recapitalization to JBL to maintain CRAR	166
Fig. 7.5	Sector-wise percentage of loans and advances of JBL	167

LIST OF TABLES

Table 4.1	Key points of Article 9 that is relevance with Basel Accord	84
Table 4.2	List of criteria for recognition as ECAI	87
Table 4.3	Transaction cost/issuance cost of sub-debt in Bangladesh	98
Table 4.4	Ex-ante transaction cost and coupon rate of three sub-debts issued in 2014 (amount in BDT million)	99
Table 4.5	Total <i>ex-ante</i> transaction cost for subordinated debt issued for capital adequacy purposes (amount in USD million)	99
Table 5.1	Number of CRAs in some selected countries	111
Table 5.2	Number of companies and amount (in BDT billion) for IPOs (including premium), Sub-debt and Debenture issue	112
Table 6.1	Constituents of regulatory capital (RC) under Basel accord in Bangladesh	125
Table 6.2	Computation of CRAR with debt and without debt	131
Table 6.3	List of variables	133
Table 6.4	Summary statistics of CRAR (all sample banks in the panels)	134
Table 6.5	Co-efficient and <i>t</i> -statistics (in parentheses) of panels (all sample banks)	135
Table 6.6	Co-efficient and <i>t</i> -statistics (in parentheses) of panels (PCBs)	137

Table 6.7	Co-efficient and <i>t</i> -statistics (in parentheses) of panels (Islamic banks)	139
Table 6.8	Co-efficient and <i>t</i> -statistics (in parentheses) of panels (SCBs)	141
Table 6.9	Co-efficient and <i>t</i> -statistics (in parentheses) of panels of new banks	143
Table 6.10	Percentage of changes in mean of explanatory variables	144
Table 6.11	Sub-debt investors list of ‘One Bank Limited’ (Outstanding balance in BDT millions as on December 31, 2018)	148
Table 6.12	Outstanding balance of investment of ‘One Bank Limited’ in sub-debt issued by other banks as on December 31, 2018 and 2017 (amount BDT millions)	149
Table 7.1	FBL’s key performance indicators (amount in BDT billion)	158
Table 7.2	Capital requirement and capital adequacy ratio (2013–2017) (amount in BDT billion)	159
Table 7.3	Chronicles of FBL events	160
Table 7.4	Performance of ABBL (in billions BDT otherwise stated)	162
Table 7.5	Total RWA of ABBL under Basel Framework (in billions BDT)	163
Table 7.6	Performance of JBL (in billions BDT otherwise stated)	165
Table 8.1	Capital market intermediaries in Bangladesh	176
Table A.1	Country-wise financial soundness indicators (FSIs) of banking sector (percent, end of Q4)	198
Table A.2	Banking sector performance between 2009 and 2018	199
Table A.3	ECAI’s Credit Rating Categories Mapped with BB’s Rating Grade	201
Table A.4	ECAI’s Credit Rating Categories Mapped with BB’s SME Rating Grade	202
Table A.5	Exchange rate (Taka/USD)	203
Table A.6	Timeline of CRAs evolution in the US	207