

From: -
To: [Basel Committee, Service](#)
Cc: -
Subject: The Bank of Thailand's comments on the Consultative Document: Pillar 3 disclosure requirement for remuneration
Date: Tuesday 01, March, 2011 09:59:59

Dear Secretariat of the Basel Committee on Banking Supervision,

This is with regard to the Bank of Thailand's view on BCBS's Consultative Document (December 2010): Pillar 3 disclosure requirement for remuneration (Issued for comment by 25 February 2011).

We appreciate the opportunity to comment on the consultative document Pillar 3 disclosure requirements for remuneration. We support the BCBS's objective of providing guidance on remuneration disclosure with the aim of enhancing the related parties for accessing the financial institution's sound compensation practices, especially remuneration policy which should be very concerned to reflect FI's relevant risk and the way the business is managed. Consistent with the BCBS's view, we believe that the robust disclosure on remuneration will increase transparency which is vital for prudential regulator to make an informed assessment of the entity's soundness. Moreover, the information disclosure as the starting point for prudential measure will enhance FIs to better emphasize the importance on risk management.

However, the requirements are very detailed and complicated in some aspects of both qualitative and quantitative disclosure such as frequency of meeting of remuneration committees and their remuneration amount payment, variable remuneration payment and key factors to allocate it. We consider that such disclosure might be sensitive and affect FIs on their operations and competitiveness. Cost, detail in disclosure requirement and benefit should be properly weighted. We apologise for the delay.

With my best regards,

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Director,
Risk Management Policy Office
Bank of Thailand

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