

**From:** [Md. Jahangir Alam](#)  
**To:** [Basel Committee, Service](#)  
**Subject:** Comments on "Pillar III disclosure requirement for remuneration"  
**Date:** Tuesday 28, December, 2010 15:51:31

---

Good evening.

Please accept best compliments from Mutual Trust Bank (MTB).

Yes I fully agree to the disclosure requirement for remuneration under Pillar-III. While considering disclosure for remuneration we must look in to the following things:

1. Disclosure should be mandatory specially for the bank officials who are working in managing risks like Credit Risk, Treasury Risk, Audit and inspection risks. There should be a quantitative mechanisms to identify and compare the performance of the persons compare to their predecessor.
2. Their benefit both bonuses and salary may be paid at a deferred time after judging the performance of the organization even after their leaving
3. Share holdings may be done mandatory against part of their benefits
4. Identification of value they have added during their tenure of services in the organization should be adjudged
5. Disclosure may be done mandatory for the position where there is benefit discrimination. If it is said that due to the performance of the persons who are getting more than what his colleagues are getting, should be justified in the disclosure requirement. Justification should be given for this benefit discrimination by the CEO of the bank
6. Disclosure for remuneration should be mandatory to publish quarterly so that everybody will understand how much someone is getting and how much he or she is producing
7. Disclosure for mid level and lower mid level officials should not be made mandatory. If we disclose the remuneration of the mid-level and lower, it will hamper the attraction of the persons who have core competency in some areas

If you ask me, I can present you the format for the disclosure requirement for remuneration

Looking forward to your kind reaction

**M. Jahangir Alam**

Group CRO(Bank and its three subsidiaries)

**MUTUALTRUST BANK** | Corporate Head Office

MTB Center, 26, Gulshan Avenue, Plot 5, Block SE(D), Gulshan 1,Dhaka-1212,BANGALDESH

Phone : PABX +88-02-8826966, +88-02-8822429 Extension 2410 | | Fax :+88-02-9861396, SWIFT: MTBLBDDH

e-mail : [jahangir@mutualtrustbank.com](mailto:jahangir@mutualtrustbank.com)

Web: [www.mutualtrustbank.com](http://www.mutualtrustbank.com)

The Earth is yours. Help save it! You can bank on us for getting the best interest rates against your loans. Please visit <http://www.mutualtrustbank.com> to know more about our products. Disclaimer: This email, and any attachments, are confidential and may also be privileged. If you are not the addressee, please do not disclose, copy, circulate, or in any other way use or rely on the information

contained in this e-mail or any attachments. If received in error, please notify the sender immediately, and delete this email and any attachments from your system. Mutual Trust Bank Ltd, Bangladesh does not accept liability for damage caused by this mail or any attachments. Mutual Trust Bank Ltd. MTB Centre, 26 Gulshan Avenue Plot 5, Block SE(D), Gulshan-1, Dhaka 1212 Bangladesh Tel: 880 (2) 882 6966, 882 2429, Fax: 880 (2) 882 4303 [www.mutualtrustbank.com](http://www.mutualtrustbank.com)