Hoda Vasi Chowdhury & Co

To
The Board of Directors
Dhaka Water Supply and Sewerage Authority
WASA Bhaban
98, Kazi Nazrul Islam Avenue
Dhaka 1215, Bangladesh

11 April 2019

Management Letter on The Audit of Financial Statements of Dhaka Water Supply and Sewerage Authority

For the year ended 30 June 2018

Submitted by:

Hoda Vasi Chowdhury & Co
Chartered Accountants
Karwan Bazar, Dhaka

Hoda Vasi Chowdhury & Co
Chartered Accountants
National Office
BTMC Bhaban (6th & 7th Floor)
7-9 Karwan Bazar Commercial Area
Dhaka-1215, Bangladesh
Web : www.hodavasi.com

Tel : + 880 (2) 912 0090
+ 880 (2) 818 9323
+ 880 (2) 818 9324
+ 880 (2) 914 0094
+ 880 (2) 48110980
Fax : + 880 (2) 58155346
E-mail : hvc@hodavasi.com

Hoda Vasi Chowdhury & Co

11 April 2019

The Board of Directors
Dhaka Water Supply and Sewerage Authority
WASA Bhaban
98 Kazi Nazrul Islam Avenue
Dhaka 1215, Bangladesh

Dear Sirs,

Management Letter on
The Audit of Financial Statements of
Dhaka Water Supply and Sewerage Authority
For the year ended 30 June 2018

We have audited the financial statements of Dhaka Water Supply and Sewerage Authority (DWASA) for the year ended 30 June 2018 and have submitted our opinion thereon separately. As per our practice, we set out in the following pages certain matters concerning the internal control, accounting practices, procedures and other relevant matters, which came to our notice during the course of our audit.

We understand that the management of DWASA is responsible for the maintenance of proper accounting records and for preparation of financial statements. They are also responsible for establishing and maintaining an appropriate system of internal control which includes adequate accounting records and procedures to safeguard the assets of DWASA and for prevention and detection of irregularities and fraud.

Our audit procedures were designed primarily to enable us to form an opinion regarding fair presentation of the accounts. Accordingly, we have carried out our tests and evaluation of your systems only to the extent necessary to enable us to arrive at our opinion. Accordingly, our report may have not identified, and our report should not be relied upon to have disclosed all the control weaknesses that may have existed.

We have divided each observation contained in this report as stated below:

- Findings
- Implications of Findings
- Recommendation
- Management Response

We would like to take this opportunity to put on record our sincere appreciation of the cooperation extended to us by the management and staff of DWASA during the audit.

Yours sincerely

Hoda Vasi Chowdhury & Co
Signed by:
M Munjurul Hassan, FCA
Senior Partner
hassan@hodavasi.com

Hoda Vasi Chowdhury & Co

Management Letter on The Audit of Financial Statements of Dhaka Water Supply and Sewerage Authority

For the year ended 30 June 2018

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2. Annexure- 2 (VAT and TDS)
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Memorandum of Audit Findings

Observation # 1: Adjustments made to the periodical revenue and the balances of rates receivable and given effect to in the books of the Revenue Department but not reported to the Accounts Department

Findings

We observed that the adjustments to the rates revenue given effect to by the Revenue Department subsequent to the recording of the standard periodical income were not communicated to the Accounts Department on a timely and regularly basis. The reasons for not recording such adjustments for revision, reversal, waiver, etc of rates, imposition of interests and for any other reasons in the main books of account, if such adjustments were necessary, genuine and duly approved, were not explained to us. These adjustments in the books of Revenue Department give rise to significant differences in the balances of revenue earned during a given period and rates remaining outstanding at any point of time with that maintained in the books of the Accounts Department.

Implications of findings

- The practice of making adjustments to the individual customer accounts (subsidiary ledgers) without giving effect thereof to the books of the Accounts Department (main ledger), based on which financial statements and other financial reports are made, render the main books of account discrepant and thereby the reliability of such books and reports generated therefrom will be highly questionable.
- Failure in reporting the adjustments originated by the Revenue Department to the Accounts Department on a timely and regular basis is an instance of serious weakness in the control system of DWASA in recording the financial transactions in an appropriate manner to ensure correct and complete bookkeeping.
- This departure from required control system over the customer accounts has resulted in an unreconciled understatement of rates revenue for the year by BDT 32,584,459, which is 9% of net profit for the year before taxation, and the accumulation of these unmatched differences over the years has arrived at the overstatement of rates receivables as at 30 June 2018 by BDT 1,887,364,049 representing 29% of the reported receivables and 2% of total assets on that date, as it would appear.
- Such huge differences may eventually have to be written off in the books of the Accounts Department and such a remedy will finally result in late recognition of losses of prior periods having grave impact in the year of write-off.

Recommendation

- Each and every adjustment to customer accounts originated by the Revenue Department should be reported to and recorded by the Accounts Department simultaneously and without any exception and vice versa.
- The customer accounts and the control account should be reconciled at a periodic interval regularly.

Management Response

DWASA management is going to take necessary action to find out the weakness of the existing billing software and develop it further.

Observation # 2: Adjustments to customer accounts made with retrospective effect

Findings

It was observed that Revenue Department made adjustments to the customer accounts during the year and after year-end with retrospective effect.

We received two different statements of rates receivable as of 30 June 2018 showing the aggregate balances of BDT 4,588,106,000 and BDT 4,506,036,691 generated by the Revenue Department without any reconciliation of the variation. We were informed that the balance reduced due to the adjustments made after the yearend to the customer accounts with retrospective effect.

Implications of findings

- This is a serious deviation from generally accepted accounting principles leading to misrepresentation of financial transactions.
- The correctness and completeness of the aggregate of customer balances out of subsidiary ledgers maintained by the Revenue Department are also defeated.

Recommendation

This practice being dangerous to an acceptable accounting system should be discontinued forthwith.

Management Response

DWASA management is going to take necessary action to find out the weakness of the existing billing software and develop it further.

Observation # 3 : Fixed rate allowance set against the year end balance of rates receivable

Findings

DWASA has been setting an allowance for probable doubtful accounts at each yearend at 5% on the yearend balance of rates receivable as a matter of policy. This year the amount is BDT 340,814,213.

Implications of Findings

The adequacy and justification of provision for doubtful accounts cannot be ensured without due verification and assessment of probable losses by reference to the prevailing factors.

Recommendation

The fixed rate of 5% should be reviewed under the current situation and revised if so required and such review should be carried out at an interval of 4 to 5 years.

Management Response

DWASA management is going to take necessary action to find out the weakness of the existing billing software and develop it further.

Observation # 4: Capital work-in-progress (CWIP) of BDT 5,936,458,336 in all not transferred to Property, Plant & Equipment (PPE) despite the projects were complete

Findings

As per BAS 16, items of property, plant, and equipment should be recognized as assets when it is probable that the future economic benefits associated with the asset will flow to the entity, and the cost of the asset can be measured reliably. DWASA policy is also that these CWIP should be transferred to PPE after the Project completion Report (PCR) has been issued. However, we observed in the followings in the cases that CWIP were not so transferred despite the PCR had been issued by the Project Directors the reasons for which could not be known:

Sl.	Projects completed with PCR Project Name	CWIP Balance in BDT	Month of Project Completion
1.	Gas Generator Project	399,925,644	March 2010
2.	Dhaka Water Supply & Sanitation Project	4,125,184,002	June 2016
3.	Sustainable Power Solution at Saidabad WTP phase II	25,505,123	Jan 2017
	Total	**4,550,614,769**	

In the following cases, the projects had been completed long ago but the respective PCRs were yet to be issued for reasons not known to us. It is worth noting that these projects were not included in the Monthly Progress Reports as not further work was due and that the balances on the CWIP of the projects remained unchanged during the year as we observed:

Sl.	Projects completed but no PCR issued Project Name	CWIP Balance in BDT
1.	Dhaka Water Supply & Sector Development Project	61,087,646
2.	DSWDS of Agargaon, Dhaka – WIP	275,468,091
3.	STP at Daserkandi for TDS from Hatirjheel Khal - WIP	1,049,287,830
	Total	**1,385,843,567**

As such, the total amount of **BDT 5,936,458,336** (4,550,614,769 + 1,385,843,567) were awaiting to be transferred to PPE, though the category-wise breakdown of CWIP of each project and the confirmation that the projects were operational during the year were available for our examination.

Implications of findings

- There should be no justification for not transferring the capital expenditure to PPE once the project has been ready for operation and this may be tantamount to defeating a desired control system.
- PPE has not been recognised on a timely basis and the assets remained undepreciated despite normal wear and tear, and thereby BAS-16 has been denied being complied with and the operational results for a given period is understated to the extent of the amount of depreciation that should have been charged.
- Withholding issue of PCR without adequate documentation casts a reflection on the effective internal control system.
- The absence of classification of CWIP under appropriate categories of PPE together with the respective costs at the initial stage will invariably result in misstatement of costs of the assets improper recording of the assets that can hardly be rectified at a later stage.

Recommendation

- PCR should be issued together with proper breakdown of the costs of the assets under appropriate category and communicated to the Accounts Department on a timely basis.
- Delay in the issue of PCR for any reason should always be adequately documented and reported to the concerned departments including Accounts Department.

Management Response

DWASA will take the necessary steps to transfer from CWIP to PPE in timely manner.

Observation # 5: Grants or loans received from the Government and the foreign donors/lenders in respect of two projects were not reflected in the financial statements of DWASA

Findings

Funds received from the Government of Bangladesh and foreign donors/lenders in connection with two projects namely, Dhaka Water Supply Network Improvement Project (DWSNIP) and Preparatory Activities of Dhaka Sanitation Improvement Project (PADSIP) totaling approximately BDT 3,013,100 thousand were not reflected in the books of DWASA. Expenditure incurred out of the said funds, capital or revenue in nature, were not also incorporated in the books of DWASA on the assumption that the funds were not received by DWASA direct from the financiers or the Government although the projects were implemented under the supervision of DWASA.

Implications of findings

Accountability of the funds allotted and utilisation thereof by the projects remain unaccounted for due to the fact that the financial transactions are not incorporated in the books of DWASA. As a result, the financial affairs of the projects were not also examined by the auditors inasmuch as the scope of statutory audit is restricted to the examination of the books of account of DWASA.

Recommendation

This is an imprudent accounting policy to defer the recognition of liabilities and corresponding assets of certain projects for no obvious justification if the project eventually belongs to DWASA. Such a policy also suffers from the absence of adequate control of the financial affairs of the projects. The project accounts should then be audited separately if there were legitimate grounds for not including the assets and liabilities of an ongoing project until completion thereof.

Management Response

DWASA will take necessary steps to account for and recognize the liabilities and assets to control the financial affairs of the projects.

Observation # 6: Unreconciled differences in the value of assets of projects in the books of account arising from discrepancies in recording the transactions from the records of the projects

Findings

We have noted unreconciled differences of some project costs between the records maintained by the respective projects and that recorded in the books of account of DWASA. Such discrepancies were noted in three completed projects and seven ongoing projects as mentioned below (all figures in Bangladesh Taka):

Completed projects				
Sl.	**Project Name**	**As per PCR**	**CWIP Balance in The Ledger**	**Difference**
1.	Gas Generator Project	195,500,000	399,925,644	(204,425,644)
2.	Dhaka Water Supply & Sanitation Project	5,342,851,000	4,125,184,002	1,217,666,998
3.	Sustainable Power Solution at Saidabad WTP phase II	248,736,000	25,505,123	223,230,87

SL	Project Name	Ongoing projects		
		As per PMU	CWIP balance in the ledger	Difference
1.	Savar Tetuljhara	4,564,200,000	808,600,000	3,755,600,000
2.	Padma Jashaldia	24,637,300,000	5,666,100,000	18,971,200,000
3.	Dasherkandi	6.237,800,000	257,700,000	5,980,100,000
4.	Saidabad Phase 3	915,700,000	700,100,000	215,600,000
5.	DESWSP – WIP	7,204,100,000	1,093,000,000	6,111,100,000
6.	IWSP – WIP	4,370,800,000	4,443,200,000	(72,400,000)
7.	LIC	190,000,000	177,300,000	12,700,000

Implications of findings

These differences indicate significant weaknesses in the control over project costs and, if not reconciled and corrected on a timely basis, run with the inherent risk of misstatement of the relevant financial data for internal and external reporting purposes either, and finally DWASA may encounter financial losses due to not recording the transactions in an appropriate manner.

Recommendation

This is an imprudent accounting policy to defer the recognition of liabilities and corresponding assets of certain projects for no obvious justification if the project eventually belongs to DWASA. Such a policy also suffers from the absence of adequate control of the financial affairs of the projects. The project accounts should then be audited separately if there were legitimate grounds for not including the assets and liabilities of an ongoing project until completion thereof.

Management Response

DWASA management already communicated with related division or project office and have taken proper actions as per Project accounts rules.

Observation # 7: BDT 17,496,205,438 carried forward under Grants and Other Funds in respect of 36 projects from 2010 or prior thereto.

Findings

A total amount of **BDT 17,496,205,438** has been carried forward under Grants and Other Funds in respect of 36 projects since 2010 and the period prior thereto without any movement in the relevant balances of grants or loans. The reasons for either non-payments of the loans, if these were loans, or not transferring the balances to grants could not be known for the reason that the management were not certain about the nature of the funding in the absence of any directions from the Government. The agreements and grant expenditure details relating to these old finances were not traceable. The present status of the projects if those were operational or not could not be confirmed by DWASA.

List of the projects together with the outstanding balances is given in ***Annexure-1*** to this report.

Implications of findings

- The foregoing condition vividly reflects the lack of adequate control in the follow-up of the high-priced projects and the corresponding funding arrangements;
- Misplacement of the important documents relevant to such large projects could hardly be excused;
- The absence of grant expenditure details of the projects defeated all and any scope for verification and tracing of the project costs in the books of DWASA to any degree certainty; and

- All these factors may lead to huge financial losses to DWASA leaving no scope for recovery.

Recommendation

- The misplaced documents should be traced out on a priority basis and the books of DWASA updated accordingly;
- The matter should then be taken up with the Government to ascertain the present status of the credits and the books of DWASA be corrected accordingly;
- The project related documents should be maintained in an effective manner with due importance that it deserves; and
- Such lapses should not be allowed to recur in future.

Management Response

DWASA management is going to take necessary steps to separate and reconcile of the grants and loans as per IAS.

Observation # 8: Lapses in the collection and deposit of Tax and VAT on direct payments to foreign contractors and consultants under different projects

Findings

Fees and rewards payable to foreign consultants and contractors working in various foreign-funded projects were subject to income tax and value added tax (VAT) under Income Tax Ordinance 1984 and Value Added Tax Act 1991 respectively but for the stipulations of the respective bilateral agreements in terms of which Government of Bangladesh was liable to account for the said taxes out of its own fund earmarked for this purpose. DWASA was required to withdraw the funds from the Government account and then deposit the same to the national exchequer under the heads of income tax and VAT. There were lapses on the part of DWASA in discharging its liabilities reportedly due to non-availability of the Government fund in time and late notification of the payments to foreign consultants and contractors to DWASA. The shortfall in the payment of taxes is estimated at BDT 1,030,741,301 approximately as shown in ***Table 1*** in ***Annexure – 2***.

Implications of findings

- DWASA has exposed itself to the mischief of the penal provisions of the fiscal laws that could hardly be remedied if taken into cognisance by the income tax and VAT authorities, apparently due to its failure in taking effective steps to comply with the legal requirements on a timely basis. The applicable penal measures prescribed in the fiscal laws may extend to imposition of interest, recovery of tax that was not paid to the credit of the Government and in extreme cases imposition of penalty for a sum equal to the tax that has not been deposited;
- Costs of CWIP of the relevant projects and the liabilities on account of Government credits as well have been understated by the amount of taxes not accounted for.

Recommendation

DWASA should treat the matter with due importance for the sake of safeguarding its interest and take necessary steps to ensure effective compliance with legal requirements.

Management Response

DWASA management already communicated with related division or project office and have taken proper actions as per NBR rules.

Observation # 9: All bank accounts not reconciled timely, regularly and properly

Findings

A. Two mother/main accounts were not reconciled correctly:

The net differences of BDT 304,369,532 and BDT 32,509,857 between the balances shown in the books of DWASA and the corresponding bank statements as of 30 June 2018 in respect of bank account # 2400083(8) and # 12845 respectively both maintained with Janata Bank Limited, Kawran Bazaar Branch, Dhaka could not be verified due to incorrect reconciliation of the balance. The details of the discrepancies noted in the Bank Reconciliation Statements are given ***Table- 1*** of **Annexure- 3** to this Management Letter

B. Reconciliation Statements for two Project Bank Accounts were not available:

Reconciliation statements were not available for the two Project bank accounts. Balances in these accounts on 30 June 2018 were BDT 4,545,426 (Agrani Bank Limited, Kawran Bazaar Branch, Dhaka) and BDT 12,659,985 (Sonali Bank Limited, Kawran Bazaar Branch, Dhaka) as per books of DWASA as against the balances of BDT 491,242,020 and BDT 112,108,239 respectively appearing in the bank statements. The details of these bank accounts along with corresponding differences with book balances are given ***Table- 2*** of ***Annexure- 3*** to this Management Letter. We were informed that these two accounts were taken over by Dhaka Environmental Sustainable Water and Sanitation Programme (DESWSP) on 06 November 2016 and 02 November 2016 respectively but the book transfer of the money two the Project account was not given effect, presumably through an oversight. It is worth noting that the transactions effected through these two bank accounts since the above-noted two dates were not incorporated in the books of DWASA for which written decision of the management was not available.

C. Discrepancy between bank statement and bank confirmation:

There was unexplained difference of BDT 4,140,384 between the balance appearing in the bank statement and that confirmed by the bank to us subsequently in response to our request letter in respect of account (VAT- BD Commerce Bank Online 0210007511). According to the bank statement and books of accounts of DWASA the balance on 30 June 2018 was BDT 4,140,384 while the bank confirmed to us NIL balance on this account as of the same date.

D. Bank reconciliation statements not authenticated, and payment related documents not properly maintained:

It appeared in the course of our test check that the bank reconciliation statements were not signed by the persons preparing it and by those who checked and approved it.

E. Bank balances included stale cheques as reconciling items:

It appeared from our check of the bank reconciliation statements that a good number of stale cheques earlier issued to and received from various parties were shown in 22 bank accounts as reconciling items for no justifiable reasons. The cheques totalling a significant amount aging more than six months but not cleared by the banks were carried in the books of DWASA till 30 June 2018 apparently without investigating into the matter. The detail list of such stale cheques is given ***Table- 3*** of ***Annexure-3*** to this Management Letter.

Implications of findings

A. Two mother/main accounts were not reconciled correctly:

Bank reconciliation statements, if not prepared correctly, would frustrate the objectives and purposes of such exercise entailing financial losses due to not identifying the uncleared items on a timely basis.

B. Reconciliation statements for two Project bank accounts were not available:

Inasmuch as the money deposited on the bank accounts were physically transferred to the project in December 2016, the absence of book transfer has so far inflated bank balances in the books of DWASA and thereby the statements of financial position for the relevant years including this year have been distorted to the extent of the wrongly reported bank balances.

C. Discrepancy between Bank Statement and Bank Confirmation:

Such discrepancy may lead to errors in the bank statements not deleted in time.

D. Bank reconciliation statements not authenticated, and payment related documents not properly maintained:

- The authenticity of the bank reconciliation statements cannot be ensured, and the accountability of any errors therein cannot be established unless these statements are signed by the officials preparing, checking and approving the same. The responsibility of the errors detected in the reconciliation statements in the course of our audit can hardly be assigned to anybody now due to the absence of the required signatures.
- This was a serious weakness in the control system over payments that DWASA did not hold adequate documentary proofs of payments so as to substantiate the transactions conclusively and to defend any dispute on such transactions.

E. Bank balances included stale cheques as reconciling items:

Inclusion of stale cheques as open items of bank reconciliation statements vouches for the fact that the bank reconciliation statements were prepared in a rather robotic manner and that these statements were not checked with due care. In the result, the bank balances and the corresponding party-ledger balances were distorted at the expense of DWASA, especially for letting the inward stale cheques not being detected in time.

Recommendation

A. Two mother/main accounts were not reconciled correctly:

The importance of timely, correct and regular reconciliation of the bank balances does not require any overemphasis.

B. Reconciliation statements for two Project bank accounts were not available:

It should be duly looked into if the bank balances of December 2016 were properly transferred to the project with the approval of DWASA management, the reasons for not incorporating financial transactions of the project since December 2016 in the books of DWASA and then the mere book balance of the said cash at bank as of December 2016 should be eliminated, if so required, from the books of DWASA after obtaining approval of the management.

C. Bank reconciliation statements not authenticated, and payment related documents not properly maintained:

- Bank reconciliation statement should invariably bear the signatures of the officials who prepare it and those who check and approve it.
- Acknowledgements of receipts by third parties including the employees of DWASA should be obtained, stamped (as prescribed by the Stamp Act 1899 and maintained for reasonable period for reference.

D. Bank balances included stale cheques as reconciling items:

The reconciliation statements should be prepared in a prudent and functional manner – eliminating always the risk of inclusion of time-barred cheques and other negotiable instruments. Rather, such instruments should be more closely monitored, and the relevant book entries reversed immediately after the expiry dates.

Management Response

DWASA management is going to take necessary action to reconciliation mentioned the two bank accounts properly and project bank accounts will be closed the next financial year in proper way.

Observation # 10: (a) Closing inventory for SWTP Phase- 2 and Shanti Bottle Plant neither worked out nor reported, (b) line items under R&M expenditure not agreed with budget line items

Findings

A. Closing inventory not reported:

DWASA charged the entire costs of materials and supplies purchased for SWTP Phase – 2 project and Shanti Bottle Plant to expenses for the year irrespective of actual consumption during the year in a departure from BAS- 2: Inventories which prescribes to report the carrying amount of inventories at the end of the accounting period. We did not see any approval of management to this unusual policy. The volume of closing inventories of these two projects could not be quantified in the absence of any physical count carried out at the yearend and the item-wise unit cost of the individual items were never worked out. Total charges for repairs & maintenance for these two projects were for BDT 361,212,481 and BDT 6,388,909 respectively.

B. Mismatch of line items of R&M expenditures and the budget:

The line items of expenditures under Repair & Maintenance were different from those adopted for budget reporting. The reasons for and management approval to such variance could not be known.

Implications of findings

A. Closing inventory not reported:

The practice followed by DWASA was not prudent and justified. It runs with the inherent risk of inflating costs of operations with corresponding understatement of closing stock of materials and supplies. Moreover, this practice establishes serious weakness over control on the movement of materials and supplies due to charging out the entire inventory at the point of procurement and in the absence of adequate record keeping for the movement of the items, especially if the purchases are made mainly to meet the budget deadline.

B. Mismatch of line items of R&M expenditures and the budget:

Disparity between the line items as stated above, even if approved by the management, leads to fettering effective control over the exercise and implementation of management projection and decision.

Recommendation

A. Reporting the closing inventories:

The practice of charging out the entire costs of materials and supplies to expenses with complete disregard to the unconsumed stocks at the yearend should forthwith be discontinued, and adequate control over the stocks of all materials and supplies be established necessity whereof needs not be underscored further.

B. Matching of line items of R&M expenses and the budget:

The inconsistency of the actual line items of any expenditure, capital or operational, as compared to the corresponding budget lines should be looked into afresh and eliminated with immediate effect so as to ensure effective control of the management on each and every line item including making meaningful analysis of budget variances possible.

Management Response

DWASA will take necessary steps for recognizing closing inventories in the financial statements according to their nature.

Observation # 11: Liabilities regarding pending and impending litigations and claims not recognized, reviewed, recorded and reported properly

Findings

A. Adequate information as to the threatened and pending litigations and claims not available

We could not obtain from the Law Department of DWASA the details of the litigations pending against DWASA and of those, if any, lodged by DWASA. We could not also collect the total number of ongoing lawsuits from them. We presumed that the function of the Law Department was confined only to assisting the lawyers of DWASA dealing with the cases. Details of any contingent assets, if any, could not also be known to us.

BAS – 37: Provisions, Contingent Liabilities and Contingent Assets requires that disclosure of contingent liabilities and contingent assets is made in the financial statements of an entity together with an estimate of their financial effect, duly measured, and an indication of the uncertainties relating to the amount or timing of the outflow or inflow.

B. Up-to-date status of the ongoing litigations not adequately documented

The up-to-date status of the suits pending before the courts as on the date of our discussions were not available with the Law Department. It appears from the minutes of the 248th Board meeting held on 20 December 2017 that DWASA suggested for payment of BDT 48,000,000 in total to meet the awards in eighteen arbitration review cases decided against DWASA but the liability was not accounted for in the books. We could not ascertain the status of the award given by the District Commissioner regarding payment of interest of BDT 71,824,666 in addition to the principal amount. We did not find any provision set up in the books for BDT 71,824,666. We were provided with a list of 42 cases in connection with acquisition of land continuing since 1990 and gathered that a successful outcome the cases was very remote but the updates thereof and the aggregate value of the claims were not readily available.

C. Board needs follow-up the matters on a regular basis

It did not appear from the proceedings of the Board that it calls for the progress reports on the ongoing or intimated litigations from the Law Department on a regular basis for the purposes of review of the cases.

D. True and fair disclosure of liabilities and probable liabilities in the financial statements is imperative

Total number of suits pending before the courts and those were awaiting to be filed or contested in the courts were not readily available with the Law Department at the time of our review. The relevant documents were not also maintained in the Department but in the chambers of the concerned lawyers dealing with cases, we were given to understand. As a result, the quantum of ascertained and probable liabilities could not be ascertained.

Implications of findings

A. Adequate information as to the threatened and pending litigations and claims not available

The absence of complete and correct information relating to the lawsuits impede the smooth functioning of the Law Department, and the resultant assets and liabilities are deprived of recognition in time.

B. Up-to-date status of the ongoing litigations not adequately documented

Records without latest progress report of the disputes do not serve any meaningful purposes in forming any opinion and making any correct decision.

C. Board needs follow-up the matters on a regular basis

Continuous and direct supervision of the Board of Directors is a prerequisite for proper performance of this Department.

D. True and fair disclosure of liabilities and probable liabilities in the financial statements is imperative

Adequate and objective disclosure of obligations and rights arising from legal disputes will be frustrated due to inadequate and incorrect information about the progress of the litigations.

Recommendation

A. Adequate information as to the threatened and pending litigations and claims not available
Law Department should be directed to obtain and maintain all necessary information about threatened and pending disputes in a timely manner.

B. Up-to-date status of the ongoing litigations not adequately documented
It is imperative that up-to-date status with supporting documents of the cases are readily available with the Law Department for all required purposes.

C. Board needs follow-up the matters on a regular basis
There should be a system in place that Law Department keeps the Board updated with the progress of all disputes on a regular basis so as to enable the Board take necessary decisions in time.

D. True and fair disclosure of liabilities and probable liabilities in the financial statements is imperative
The importance of maintaining and communicating adequate and correct report on the progress and result of the lawsuits and other disputes dealt with by the Law Department for the purposes of internal and external reporting does not require any further elaborations. Necessary provision for ascertained and agreed liabilities should immediately be set up in the books on the basis of review of the results of decided cases.

Management Response

DWASA will take proper steps for contingent liabilities for pending lawsuits.

Observation # 12: Provision for staff overtime expenses for the months from March 2018 to June 2018 not set up in the books

Findings

We were given to understand that cost of overtime (working late hours and on holidays) payable to the employees for the months of March 2017 to June 2017 was not booked by DWASA pending the settlement of the dispute on the matter with the collective bargaining agents. We were also confirmed that DWASA was in the process of introduction of biometric attendance system of the members of staff that might have impact on the hours of overtime work claimed in addition to the rate of hourly compensation to be reviewed. The hourly rate of overtime was agreed at double of the hourly rate of basic salary of each eligible employee in terms of an agreement entered into by the then WASA on 30 March 1970.

As a result, personnel cost for the year under report has been overstated by an amount approximately equal to 7% of the net profit for the year before tax with corresponding inflation of the net profit to the same extent.

Implications of findings

Liability of DWASA in this regard was ascertained inasmuch the event had occurred (the employees had worked beyond their usual working hours) and cost related thereto was readily measurable by reference to the CBA agreement being in force at 30 June 2018. Rather, any effect of the revised decision of the management or the revised terms of any new agreement with the CBA, if any, was unknown and uncertain at that point of time. As such, there was no good reason not to recognise the liability at the yearend.

Recommendation

As the amount of outstanding overtime pay was significantly material and all the conditions for recognising the liability was prevalent, holding back the liability was not justified by any reason. Recurrence of such omission should be avoided.

Management Response

DWASA will create provision for the next financial year as per IAS.

Observation # 13: Repayment of IDA 3rd Project Loan remained unverified, and (b) new Loan from Government not properly documented

Findings

A. Repayment of IDA 3rd Project Loan remained unverified:

Total payment of BDT 330,657,227 during the year towards repayment of the IDA 3rd Project Loan reportedly represented the balance amount of interest accrued on the loan balance could not be verified by us due to the absence of the agreement, disbursement advice or the acknowledgement of receipt by the lender.

A letter dated 25 June 2018 of DWASA to the Ministry of Finance requesting therein for the details of the payments confirms our above-noted observation.

B. New Government Loan not properly documented:

DWASA booked a non-current liability of BDT 513,700,000 during the year as Government Loan. We were given to understand that the Government (GOB) reportedly discharged the liability of DWASA for consumption of electricity direct to Dhaka Electric Supply Authority (DESA) in pursuance of the decision of a tripartite meeting of GOB, DWASA and DESA in the matter of the said liability of DWASA to DESA. We, however, could not verify the purported liability of DWASA to DESA by reference to any documentary evidence. DWASA also confirmed that it was not provided with any documents supporting the discharge of DWASA's liability to DESA by GOB, the terms of repayment of the loan incurred by DWASA or the minutes of the tripartite meeting mentioned above. No interest on the loan was accounted for in the books of DWASA during the year.

Implications of findings

A. Repayment of IDA 3rd Project Loan remained unverified:

In absence of the loan agreement, it was not possible to substantiate the accuracy of the final payment of BDT 330,657,227 for interest charges paid against during the year.

B. New Government Loan not properly documented:

In absence of any underlying agreement and/ document it was not possible to substantiate the repayment conditions with GOB, therefore was not possible to confirm the balance of Government Loan for Power on the balance sheet date.

Recommendation

A. Repayment of IDA 3rd Project Loan remained unverified:

DWASA should take effective measures to obtain substantiating documents in support of the payments and as to the nature thereof.

B. New Government Loan not properly documented:

DWASA should take necessary steps to obtain the relevant documents to corroborate the reported loan and to ensure verifiability of subsequent repayment thereof or otherwise.

Management Response

DWASA management already communicated with line ministry and finance ministry for updated status of loans.

Observation # 14: Receivable from ICB Islamic Bank Limited of BDT 21,039,015 reported in the financial statements appears to be discrepant with the old records

Findings

The balance of BDT 32,555,345 receivable from ICB Islamic Bank Limited on 30 June 2017 as appeared in the financial statements of DWASA for the year then ended was arrived at after deducting its receipts totaling BDT 21,166,655 This balance, however, reduced to BDT 21,051,475 on 30 June 2018 albeit DAWASA did not receive any payment from the bank during the year to 30 June 2018 nor any such adjustment was advised by Bangladesh Bank during the same period. The reasons for the reduction of BDT 11,388,690 were not explained to us.

DWASA confirmed to have sent two request letters dated 11 December 2017 and 04 March 2018 for the 18th and 19th instalments of repayment for BDT 2,000,000 each as per the notification of Bangladesh Bank # BRPD(R-1)65/9(10)/2016-7231 on dated 03 November 2016 but the bank did not make any payment.

Implications of findings

If the closing balance as recorded in the books of accounts is not correct then the asset is understated by BDT 11,516,330.

Non-payment if instalments as per the BB notification may indicate future complication in receiving disbursement against the claimed amount.

Recommendation

The entity should communicate with ICB to confirm the actual receivables amount and follow up the payment status as per notification and also pass appropriate adjustments in books of accounts to reflect the correct and appropriate amount of closing balance (if necessary).

Management Response

DWASA management already communicated with ICB and hope it will solve the next financial year.

Observation 15: VAT not collected on some fees and charges, (b) incorrect deduction of tax and VAT, (c) improper maintenance tax and VAT challans, and (d) non-submission of annual payroll return

Findings

A. VAT not collected on connection fee and other charges:

DWASA was required to collect VAT at source from its customers on connection fee, etc as prescribed in Rule 18Uma(2) of the VAT Rules 1991. However, we did not come across any documentary evidences in support of collection of VAT on this account during the year. The total uncollected VAT would be around to **BDT 30,006,521** as detailed in ***Table- 2*** of ***Annexure- 2*** hereto.

B. Incorrect amount of tax and VAT deducted from vendors' payments:

On the basis of our test check it appeared that DWASA made deductions of incorrect amounts of tax and VAT from payments to vendors. The shortfall in deduction of tax by **BDT 14,910,979** and VAT by **BDT 8,668,315** in the cases noted by us have been shown in ***Table- 3*** of ***Annexure- 2*** hereto.

C. Inadequate and improper record keeping for Tax and VAT deducted at source:

We observed that DWASA did not maintain the original receipted challans for income tax deducted at source and duly authenticated copies of VAT challans in a systematic and orderly manner.

D. Non-submission of annual statutory payroll return

DWASA did not file the annual return of salaries to the employees with the tax authorities as required under Section 108 of the Income Tax Ordinance 1984 during the year under audit. Said Section 108 requires every employer to file such return in the prescribed form by 31 August immediately next to the concerned financial year.

Implications of findings

A. VAT not collected on connection fee and other charges:
Failure to collect due VAT from the customers and non-payment of the same amount to the credit of the Government will attract the mischief of the relevant penal provisions of VAT laws (section 37(2) of VAT Act 1991).

B. Incorrect amounts of tax and VAT deducted from vendors' payments:
- Short deduction of tax at source will entail outright disallowance of revenue expenses, recovery of such tax from DWASA including penalty and other punitive measures provided for in the income tax laws; and
- Short deduction of VAT may result in recovery of such VAT from DWASA together with interest and penalty prescribed in this behalf

C. Inadequate and improper record keeping for Tax and VAT deducted at source:
The importance of proper and effective maintenance of evidences for payment taxes to the credit of the Government does not need overemphasis.

D. Non-submission of annual statutory payroll return:
This non-compliance may attract the mischief of Section 124 of the Income Tax Ordinance 1984 prescribing 10% of tax imposed on the last assessed income plus BDT 1,000 for each month of continuing default.

Recommendations

A. VAT not collected on connection fee and other charges:
DWASA should collect VAT from its concerned customers and deposit the same to the national exchequer without any further delay and onward meticulous compliance with the fiscal laws should be ensured.

B. Incorrect amount of tax and VAT deducted from vendors' payments:
Due care should be taken in complying with the requirements of deduction of taxes at source. A deviation may have serious consequences, if the assessment orders of DWASA for past years are looked at. Assistance of expert opinion should be availed of if so required.

C. Inadequate and improper record keeping for Tax and VAT deducted at source:
DWASA should take immediate measures for safe and secured maintenance of the documents relating to income tax and VAT at least for the periods required by the respective laws.

D. Non-submission of annual statutory payroll return
The pending returns should be filed at the earliest and future compliance with all reporting requirements be ensured without any variation.

Management Response

DWASA management will take necessary action to solve the issue.

Observation 16: Inadequate documentation relating to income tax assessments

Findings

DWASA did not appear to maintain the records for its income tax assessments in an orderly and up-to-date manner. We could not find the copies of returns of income, acknowledgement receipts of the returns, notices of hearing, assessment orders, appeal orders and other relevant documents for the recent years available for our review. We understand that the dealings with the income tax matters, especially those relating to assessment of income of DWASA, were outsourced and a number of these critically important documents were lying with the tax consultants. As a result, we could not ascertain the state of affairs of the completed and the pending assessments and the measures taken against the disputed assessments.

Implications of findings

Absence of such important records would lead to an inference that the income tax cases were not adequately and effectively monitored and supervised by the management. Any lapses arising out of inadequate and inappropriate follow-up of the cases may lead to significant financial loss to DWASA not being detected in time.

Recommendations

It is crucially imperative that the cases relating to fiscal matters are closely and adequately monitored so that the interest of DWASA in these respects are well-protected. The tax consultants should be advised to report on the progress of the cases to the management of DWASA in a timely and regular manner. Copies of all returns, notices, correspondences and orders should invariably be maintained in the office of DWASA.

Management Response

DWASA management will take necessary action to solve the issue.

Observation 17: No movement in the balance of deferred tax liability

Findings

DWASA recognised deferred tax liability in its books on the surplus arising out of revaluation of fixed assets in 2006. No further treatment on account of deferred tax has so far been made in the books of DWASA either in respect of the revaluation surplus or otherwise for no justification. BAS -12 requires that deferred tax should be recognised regularly and on an annual basis. But the said accounting standard has not been followed in the preparation of the financial statements over the years including that for the year ended 30 June 2018.

Implications of findings

In the result of the non-compliance with BAS-12, the balance of BDT 7,787,503,478 carried in the statement of financial position as at 30 June 2018 does not serve any meaningful purposes nor the state of affairs of DWASA as at that date has been reflected fairly.

Recommendations

It is imperative that the BAS-12 is duly complied with for obvious reasons.

Management Response

DWASA management will take necessary action to solve the issue as per BAS-12.

Observations # 18: Accrual basis of accounting were not consistently followed .

Findings

As per Note 2.1 of Financial Statement the company asserts to prepare the financial statement in compliance with BFRS & BAS. BAS 1 requires that an entity prepare its financial statements, except for cash flow information, using the accrual basis of accounting by recognising items as assets, liabilities, equity, income and expenses (the elements of financial statements) when they satisfy the definitions and recognition criteria. But during our audit we observed that accrual basis was not fully followed and there by the confirmation in the said Note 2.1 has been frustrated.

We have noted that in the following cases the income and expense items have been recognized and reported on cash basis.

Income items:

Sl.	Particular of Income	Amount		
		Income received	Income accrued	Difference
1.	Jar Water License Fee	528,750	1,050,000	(521,250)
2.	Royalty of Deep tube well	195,033,118	270,485,701	(75,452,583)
3.	Office Rent Income	-	6233920	(6,233,920)
4.	Salary Deduction	-	1519942	(1,519,942)
Total		**195,561,868**	**279,289,563**	**(83,727,695)**

Expenses:

Sl.	Particulars of Expenses	Period of Incurring	Amount
1.	Lease Out Zone	June 2017	64,978,936
2.	Overtime	Feb to June 2017	379,695,191
Total			**441,674,127**

In view of the above, it can be said that the financial statement is not prepared in accordance with BAS and BFRS.

Implications of findings

These deviations contradicts the confirmation of the management regarding compliance with the accounting standards adopted as the basis of reporting, misstate the financial statements and mislead the readers and stakeholders.

Recommendation

This practice should forthwith be discontinued for obvious reasons.

Management Response

DWASA management will take necessary steps to adopt the accrual basis of accounts and all reports as per BAS-1.

Previous Year's Follow-up

Sl.	Issue/observation	Auditor's Recommendation	Status
1.	CWIP not transferred to Property, Plant & equipment (PPE) upon the fulfilment of recognition criteria as per BAS 16 Property, plant and equipment	The entity should transfer CWIP to PPE in timely manner i.e. as soon as they are ready to be used in line with BAS 16.	Not Implemented
2.	Long term loan availed by the entity is understated by an amount of BDT 213,713 (in lac)	There should be proper liaison between the appropriate parties so that all project financial information are recorded in the books.	Not Implemented
3.	No reliable estimate was available on which the Provision for pension fund was based.	BAS 19 should be followed properly and actuarial valuation should be carried out.	Not Implemented
4.	Receivables from ICB Islamic Bank Limited could not be confirmed	The entity should communicated with ICB to confirm exactly the receivables amount and pass appropriate adjustments if necessary.	Not Implemented
6.	Temporary advance balance of BDT 64,620,092 could not be confirmed	DWASA should develop a policy of adjusting temporary advances within reasonable time period.	Not Implemented
7.	No supporting documents provided for numerous balances	Appropriate and adequate supporting should be maintained for all the account balances by DWASA	Not Implemented
8.	Inadequate supporting to substantiate the FDR of BDT 19,522,200 on aggregate	Appropriate and adequate supporting should be maintained for all the investment instrument.	Not Implemented
9.	Till date management has not adopted any policy to recognize the revaluation surplus in the income statement	In accordance with BAS 16 property, plant & equipment, this balance should be realized in retained earnings/(Accumulated loss)	Not Implemented
10.	Unusual negative balances in various subheads under the broad heads of Advances, deposits and prepayments and Liabilities for other finance	BAS 1 Presentation of financial statements was not followed	Not Implemented
11.	Accrual basis is not consistently followed	Since management prepared the financial statement in accordance with BAS and BFRS, so accrual basis should be followed in recognizing all the elements of the financial statements.	Not Implemented
12.	VAT was not accounted for permission and connection fee purpose	Applicable VAT laws in force should be followed strictly to avoid any penalty.	Not Implemented

Annexure 1

The List of the Projects and Corresponding Grants

(Ref: Observations #7)

List of Projects and Corresponding Grants/Loans Outstanding Since 2010 or Prior thereto					
Sl.	Particulars	Project Name	Donor	Date of Completion	Grant/Loan Amount in BDT
1.	Badda Project Fund	Badda Project	N/A	N/A	59,864,000
2.	BICC Fund	BICC	N/A	N/A	57,673,890
3.	BMRE project Fund	BMRE Project	N/A	N/A	1,572,849,195
4.	Cannel Renovation Fund	Cannel Renovation	N/A	N/A	35,000,000
5.	Contingency and Reserve	N/A	N/A	N/A	7,364,890
6.	DTW under Crash Program	N/A	N/A	N/A	726,780,000
7.	Flood damage work project Fund	Flood Damage Work Project	N/A	N/A	16,800,000
8.	Generator project fund	Generator Project	N/A	N/A	154,460,000
9.	Government Loan converted to Equity	N/A	GOB	N/A	1,445,485,970
10.	Grants for drainage project	Drainage Project	N/A	N/A	34,000,000
11.	Grants for SIDA loan	N/A	SIDA	N/A	49,292,095
12.	Grants for IDA 4th Project	IDA 4th Project	N/A	N/A	294,422,000
13.	IESLCRP	IESLCRP	N/A	N/A	30,000,000
14.	IFP Project(ADB)	IFP Project	ADB	N/A	1,348,040,397
15.	IFP Project(GOB)	IFP Project	GOB	N/A	1,028,303,804
16.	Interim Project-1	Interim Project-1	N/A	N/A	355,400,000
17.	Interim Project-2	Interim Project-2	N/A	N/A	301,700,000
18.	Interim Project-3	Interim Project-3	N/A	N/A	522,800,000
19.	Interim Project-4	Interim Project-4	N/A	N/A	1180,074,000
20.	IUSERP Fund	IUSERP	N/A	N/A	125,000,000
21.	Japan France aided fund	N/A	Japan & France	N/A	2,543,486,466
22.	Mirpur Project (ADB) Fund (DUIIP)	Mirpur Project	ADB	N/A	31,095,256
23.	Mirpur Project (GOB) Fund	Mirpur Project	GOB	N/A	61,500,000
24.	PFRP Fund (Sewer)	PFRP	N/A	N/A	126,233,000
25.	PFRP Fund (Water)	PFRP	N/A	N/A	149,558,000
26.	Procurement of Generator	N/A	N/A	N/A	222,000,000
27.	Rehabilitation of 42 no DTW	N/A	N/A	N/A	22,773,763
28.	Saidabad project Fund	Saidabad Project	N/A	N/A	937,069,619
29.	Sewerage expansion and rehabilitation	Sewerage Expansion and Rehabilitation	N/A	N/A	814,015,000
30.	Shitolakkya Narayanganj water dep Fund	N/A	N/A	N/A	26,075,000
31.	Spare parts of Saidabad	Saidabad Project	N/A	N/A	102,488,658
32.	TPFF(Sewer)	TPFF	N/A	N/A	17,372,800
33.	TPFF(water)	TPFF	N/A	N/A	10,871,000
34.	Urgent sewerage Rehabilitation project	Urgent Sewerage Rehabilitation Project	N/A	N/A	152,451,635
35.	USEEDI project fund	USEEDI Project	N/A	N/A	163,905,000
36.	WSSER project	WSSER Project	N/A	N/A	2,770,000,000
Total					**17,496,205,438**

Annexure 2

VAT and TDS

(Ref: Observations 8 & 15)

Table (1)

Unrecognized due VAT and Tax Deductible at Source (TDS) in BDT on Direct payments under different Projects

Project	Type of Expenditure	Total Payments During the Year	Applicable Rate	Applicable Amount			Deposited Amount	Due Amount
				TDS	VAT at Source	Total TDS and VAT at Source		
Dasherkandi	Civil Construction	500,000,000	VAT@ 7% TDS@ 7.5%	40,540,541	37,837,838	78,378,378	-	78,378,378
Padma Jashaldia	Civil Construction	7,507,100,000	VAT@ 7% TDS@ 7.5%	608,683,784	568,104,865	1,176,788,649	275,625,618	901,163,031
Savar Tetuljhara	Civil Construction	228,601,507	VAT@ 7% TDS@ 7.5%	18,535,257	17,299,574	67,071,672	30,060,923	37,010,749
	Foreign Consultancy	71,398,493	VAT@ 15% TDS@ 20%	17,849,623	13,387,217			
DESWSP	Foreign Consultancy	64,051,639	VAT@ 15% TDS@ 20%	16,012,910	12,009,682	28,022,592	13,833,449	14,189,143
Total		**8,371,151,639**		**701,622,115**	**648,639,176**	**1,350,261,291**	**319,519,990**	**1,030,741,301**

Table (2)

Non-collection of Applicable VAT in BDT

Particulars	Base Amount	Vat Rate	Vatable Amount
Renewal Fee of DTW	157,880,825	15%	23,682,124
Permission Fee of DTW	27,952,350	15%	4,192,853
Other Charges of DTW	3,974,804	15%	596,221
Other Charges of W&S	10,235,495	15%	1,535,324
	200,043,474		**30,006,521**

Table (3)
Inaccurate Deduction of Tax and VAT in BDT from Vendors' Payments

Tax Deductible at Source (TDS)

SL	Vendor Name	Net Payment	Applicable TDS Rate	Deducted Amount	Deductible Amount	Difference
1.	Hankuk Engineering Consultants	32,304,081	20%	3,876,490	8,076,020	(4,199,531)
2.	Dushtha Shasthya Kendra (DSK)	76,207,213	12%	9,144,866	10,391,893	(1,247,027)
3.	Bangladesh Association for Social Advancement	37,113,479	12%	4,453,617	5,060,929	(607,311)
4.	SPACE-SOF-KE	11,414,200	12%	1,369,704	1,556,482	(186,778)
5.	Water and Life Bangladesh	9,000,000	12%	1,080,000	1,227,273	(147,273)
6.	M/S Grontmij	55,868,950	20%	5,586,895	13,967,238	(8,380,343)
7.	SPACE-SOF-KE	8,721,558	12%	1,046,587	1,189,303	(142,716)
	Total			**87,331,510**	**191,146,403**	**(14,910,979)**

VAT at Source

SL	Vendor Name	Base Amount	Applicable VAT Rate	Deducted Amount	Deductible Amount	Difference
1	Hankuk Engineering Consultants	40,380,101	15%	4,845,612	6,057,015	(1,211,403)
2	Dushtha Shasthya Kendra (DSK)	86,599,106	15%	11,431,082	12,989,866	(1,558,784)
3	Bangladesh Association for Social Advancement	42,174,408	15%	5,567,022	6,326,161	(759,139)
4	SPACE-SOF-KE	12,970,682	15%	1,712,130	1,945,602	(233,472)
5	Water and Life Bangladesh	10,227,273	15%	1,350,000	1,534,091	(184,091)
6	M/S Grontmij	69,836,188	15%	8,380,343	10,475,428	(2,095,086)
7	SPACE-SOF-KE	9,910,861	15%	1,308,234	1,486,629	(178,396)
8	Income from Office Rent	16,319,629	15%	-	2,447,944	(2,447,944)
	Total			**34,594,422**	**43,262,737**	**(8,668,315)**

Annexure 3

Bank Account Reconciliations

(Ref: Observations #9)

Table (1)

Sl.	Bank Name and Account No.	Cash Book Balance	Bank Balance	
			As per Bank Statement	As per Reconciliation Statements
		BDT		
1.	Janata Bank Ltd. 240000083(8)	500,847,131	196,477,600	487,796,996
2.	Janata Bank Ltd-200012845	(28,519,681)	3,990,177	463,390,675

Table (2)

Sl.	Bank Name and Account No.	As per Tally Records	As per Bank Statement	Difference
		BDT		
1.	Agrani Bank- 0200002330753 DESWSP	4,545,426	491,242,020	486,696,594
2.	Sonali Bank A/c No- 0117203000205 DESWSP	12,659,985	112,108,239	99,448,254

Table (3)

Sl.	Bank name	Uncleared Lodgment	Unpresented Cheques
1.	Agrani Bank ,STD-0200005465653(IWSP)	50,000,000	111,198
2.	Agrani Bank, Green Rd # 0200002305048 Vakurta	-	31,130
3.	Basic Bank A/c-3116010000443 K.B Padma(Jasoldia)	2,000	2,983,774
4.	Basic Bank Ltd-3116-01-0000597 (DSTP)	-	1,109,924
5.	Basic Bank Ltd-3116-01-0000604(SP-3)	-	7,627
6.	Janata Bank KB Br 240001083 Lease Out Zone Payment	-	177,856
7.	Janata Bank Ltd. 240000764(76)		6,900
8.	JBL-A/c-240001021 Group Insurance	-	155,000
9.	Janata Bank, Kb A/c CD 200040491, OT	-	13,556,255
10.	Janata Bank Ltd. 36000248 NTP	-	663,780
11.	JBL STD-240000904 (90) Electricty Bill	-	45,173,618
12.	JBL-STD-240000873 (87) Revenue Security Deposit	822,163	76,415
13.	Janata Bank K.B,240000894 (89) Salary	-	5,125,924
14.	Janata Bank Ltd. 240000083(8)	61,314,235	54,288,008
15.	Janata Bank Ltd. CD-200021146(2114)	547,000	355,112
16.	Janata Bank Ltd.-STD-240000801(80)	-	124,830
17.	JBL 240000338(33) Project Security Deposit	1,347,268	456,630
18.	Janata Bank Ltd-200012845	1,800,021,197	2,019,223,457
19.	Janata Bank 200020121 (2012) Drainage	-	870,610
20.	ONE Bank Ltd. Mirpur Std 5036149002	20,000	445,338
21.	One Bank Ltd.A/c-STD-5080444003, M	-	29,309,122
22.	Pubali Bank Ltd. CD- 0557102001731 (Agargaon)	-	5,905
	Total	**1,914,073,862**	**2,174,258,413**