

**"API BANK" AD., BELGRADE**

Independent Auditor's Report on the  
Audit of the Financial Statements  
for the Year 2019



*This version of our report/ the accompanying documents is a translation from the original, which was prepared in Serbian. All possible care has been taken to ensure that the translation is an accurate representation of the original. However, in all matters of interpretation of information, views or opinions, the original language version of our report takes precedence over this translation.*

**TABLE OF CONTENTS**

*P a g e s*

**INDEPENDENT AUDITORS' REPORT**

**FINANCIAL STATEMENTS**

Balance sheet

Income statement

Statement of other comprehensive income

Cash flow statement

Statement of changes in equity

Notes to the financial statements

*This version of our report/ the accompanying documents is a translation from the original, which was prepared in Serbian. All possible care has been taken to ensure that the translation is an accurate representation of the original. However, in all matters of interpretation of information, views or opinions, the original language version of our report takes precedence over this translation.*

## **INDEPENDENT AUDITOR'S REPORT**

### **TO THE SHAREHOLDERS OF "API BANK" AD., BELGRADE**

#### **Report on the Audit of Financial Statements**

##### **Qualified Opinion**

*We have audited the accompanying financial statements of „API BANK" ad., Belgrade (the "Bank"), which comprise the balance sheet as at 31 December 2019, the income statements, the statement of other comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies and other explanatory notes.*

*In our opinion, except for the effects of the matter described in the "Basis for Qualified Opinion" section of our report, the accompanying financial statements give a true and fair view of the financial position of the Bank as at 31 December 2019, and of its financial performances and its cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS).*

##### **Basis for Qualified Opinion**

*Within the placements there are certain debtors where the Bank is significantly risk exposed. In respect of the matter, and in accordance with internally adopted methodology the Bank has made provision. Gross exposure of the placements as at 31 December 2019, amounted to RSD 558,790 thousand, while a provision amounted to RSD 120,140 thousand or 21.50%. In assessing these receivables, the Bank used assumptions that in our opinion, are not sufficiently respected the prudence principle, and therefore additional impairment is needed which amount we have not been able to quantify.*

*We conducted our audit in accordance with International Standards on Auditing (ISAs) and Law on Auditing of the Republic of Serbia. Our responsibilities under those standards are further described in the "Auditor's Responsibilities for the Audit of the Financial Statements" section of our report. We are independent of the Bank in accordance with the ethical requirements that are relevant to our audit of the financial statements in Serbia, and have fulfilled our other responsibilities under those ethical requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified opinion on the financial statements.*

## INDEPENDENT AUDITOR'S REPORT

### TO THE SHAREHOLDERS OF "API BANK" AD., BELGRADE - Continued

#### Emphasis of Matter

We draw attention to the following matters in the Notes to the financial statements:

- Notes 2.5. and 37(a), regarding the Bank's regulatory capital calculated in accordance with the National Bank of Serbia's Decision on Capital Adequacy of Banks and amounts to RSD 1,442,054 thousand or EUR 12,263,115 as of 31 December 2019, translated at the official median exchange rate at the reporting date, and it is above the minimum amount of EUR 10 million prescribed by the Law on Banks. On 17 January 2020, the Assembly of the Bank brought the Decision on Increase the Bank's share capital by issuing ordinary shares at total nominal value of RSD 240,000,000.00 with a subscription and payment period of 90 days from the date of the Decision, as well as two Decisions from 04 March 2020 on Increase the Bank's share capital at the total nominal value of RSD 360,000,000.00 each with subscription and payment term not later than 30 June 2020, namely 01 September 2020. Pursuant to the Decision on interim measures adopted by the National Bank of Serbia no. 3189 dated 04 February 2020, the necessity of additional capital increase was noted as well as other irregularities occurred in the Bank's operations. Since the first transaction was completed on 16 April 2020 and depending on the realization of other two transactions (considering the potential effects outlined in the Basis for Qualified Opinion section and current losses incurred), the Bank would be able to continue its operation on a going concern basis.
- As of 31 December 2019, disclosed amount within the item Non-current assets held for sale totaled RSD 375,484 thousand. The Bank acquired property under the provisions of Sale-purchase Agreement of immovable and movable property, regarding due loan payment, concluded with the legal entity FSH "Komponenta" doo. Cuprija declaring bankruptcy as a debtor. Pursuant to the Executive Board's Decision dated 12 April 2016, the named property was classified as non-current assets held for sale. The property was offered for sale. The last appraisal was made on 31 December 2018, and the estimated amount is EUR 3,170,000.00. The new management of the Bank takes all appropriate and necessary steps to successfully sell property.
- Note 41. - Events after the reporting period regarding the: COVID 19 pandemic and that on 15 March 2020, Republic of Serbia has introduced a state of emergency to halt the spread of coronavirus. Given the nature of business (products and services provided) any significant negative impact on the Bank's operations had so far, since the Bank has implemented all measures and recommendations of the Government of the Republic of Serbia. At present, management is unable to assess the overall adverse effects on the financial result for 2020. Nevertheless, the management believes that the possibility of continuing the Bank's operations on a going concern basis will not cast doubt on. A correction of the financial statements for the period 01 January to 31 December 2019 is not required due to aforementioned information.

Our opinion is not qualified in respect of this matter.

#### Responsibilities of the Management for the Financial Statements

Management is responsible for the preparation of financial statements that give a true and fair view in accordance with the current accounting regulations in effect in the Republic of Serbia, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

## INDEPENDENT AUDITOR'S REPORT

### TO THE SHAREHOLDERS OF "API BANK" AD., BELGRADE - Continued

#### Responsibilities of the Management for the Financial Statements - continued

*In preparing the financial statements, the Management is responsible for assessing the Bank's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Management either intends to liquidate the Bank or to cease operations, or has no realistic alternative but to do so.*

*Persons authorized for management are responsible for overseeing the Bank's financial reporting process.*

#### Auditor's Responsibilities for the Audit of the Financial Statements

*The objectives of our audit are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.*

*As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the planning and performance of the audit. We also:*

- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;*
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control;*
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;*
- conclude on the appropriateness of the Management use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Bank to cease to continue as a going concern;*
- evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation;*

## INDEPENDENT AUDITOR'S REPORT

### TO THE SHAREHOLDERS OF "API BANK" AD., BELGRADE - CONTINUED

#### Auditor's Responsibilities for the Audit of the Financial Statements - continued

*We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.*

*We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.*

#### Other Information

##### Compliance of the 2019 Annual Report with the Financial Statements

*Management is responsible for the other information. The other information is all information provided in the Annual Report 2019, other than the financial statements and the Auditor's Report. Our opinion on the financial statements does not cover the other information and we do not provide assurance thereon.*

*Pursuant to the requirements of the Law on Auditing of the Republic of Serbia, we have checked the compliance of the 2019 Annual Report and the Financial Statements of the Bank.*

*In conjunction with our audit, it is our responsibility, in accordance with the International Standards on Auditing 720 - Auditor's Responsibility Relating to Other Information, to read the other information and to assess whether based on knowledge gained during our audit, it contains any material inconsistencies with the financial statements or any apparent material misstatement of fact. If we conclude that there is a material misstatement of fact in other information, we must report that fact. We have nothing to report in this regard.*

#### Other Matters

*The financial statements of the Bank for the year ended 31 December 2018 were audited by another auditor, whose Report expressed an unmodified opinion dated 16 April 2019.*

*Belgrade, 16 April 2020*

„MOORE STEPHENS  
Revizija i Računovodstvo“ d.o.o. Beograd

*Bogoljub Aleksić*  
Managing Partner





**INCOME STATEMENT**  
**For the Year Ended 31 December 2019**


	Notes	2019	In RSD thousand 2018
Interest income	5	303,073	388,023
Interest expense	5	(115,264)	(111,020)
<b>Net interest income</b>		<b>187,809</b>	<b>277,003</b>
Fee and commission income	6	117,716	81,579
Fee and commission expense	6	(44,041)	(31,999)
<b>Net fee and commission income</b>		<b>73,675</b>	<b>49,580</b>
Net gains from derecognition of financial instruments measured at fair value		7,269	-
Net (losses)/gains from hedging	7	(447)	(1,104)
Net foreign exchange gains and effects of contracted foreign currency clause	8	189,959	311,068
Net impairment loss on financial assets not measured at fair value through profit or loss	10	(24,819)	(114,123)
Other operating income	9	2,097	1,466
<b>TOTAL NET OPERATING INCOME</b>		<b>435,543</b>	<b>523,890</b>
Salaries, compensations and other personal expenses	11	(338,537)	(211,270)
Amortisation and depreciation expenses	12	(72,866)	(23,241)
Other income	13	(10,980)	11,217
Other expenses	14	(276,548)	(271,896)
<b>PROFIT/(LOSS) BEFORE TAX</b>		<b>(241,428)</b>	<b>28,700</b>
<b>INCOME TAX</b>	15		
Deferred tax income		633	1,658
<b>PROFIT/(LOSS) FOR THE YEAR</b>		<b>(240,795)</b>	<b>30,358</b>

The notes on pages 7 to 114  
are an integral part of these financial statements.

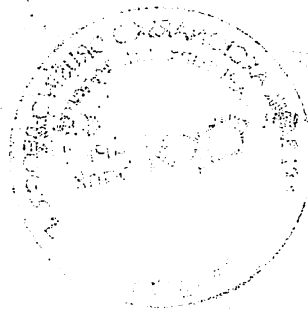
Signed on behalf of the Bank's management on 16 April 2020, by:

  
Anđelka Stanković  
Responsible for financial statements  
preparation

  
Marija Stepina  
Executive Board  
President

  
Radomir Stevanović  
Member of the Executive  
Board



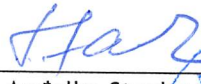





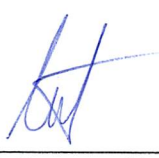
**STATEMENT OF OTHER COMPREHENSIVE INCOME**  
**For the Year Ended 31 December 2019**

	2019	In RSD thousand 2018
PROFIT /(LOSS) FOR THE YEAR	(240,795)	30,358
Other comprehensive income:		
<i>Items of other comprehensive income that can be reclassified to profit or loss:</i>		
Positive effects of change in value of debt instruments measured at fair value through other comprehensive income, net	27,634	1,383
Total other comprehensive income, net of tax	27,634	1,383
TOTAL COMPREHENSIVE INCOME/(LOSS) FOR THE YEAR	(213,161)	31,741

The notes on pages 7 to 114  
are an integral part of these financial statements.

  
Anđelka Stanković  
Responsible for financial statements  
preparation

  
Marija Stepina  
Executive Board  
President

  
Radomir Stevanović  
Member of the Executive  
Board



**BALANCE STATEMENT**  
**For the Year Ended 31 December 2019**

		31 December	In RSD thousand 31 December
	Note	2019	2018
<b>ASSETS</b>			
Cash and balances with central bank	17	1,622,903	1,969,175
Pledged financial assets		208,075	-
Securities	18	1,832,384	1,856,532
Loans and advances to banks and other financial organisations	19	1,084,546	1,996,367
Loans and advances to customers	20	3,993,011	3,912,191
Intangible assets	21	47,738	50,790
Property, plant and equipment	22(a)	139,458	26,564
Investment property	22(b)	19,610	19,873
Deferred tax assets	15(c)	6,123	5,491
Non-current assets held for sale and discontinued operations	23	376,516	375,484
Other assets	24	112,718	43,712
<b>TOTAL ASSETS</b>		<b>9,443,082</b>	<b>10,256,179</b>
<b>LIABILITIES</b>			
Deposits and other financial liabilities to banks, other financial organisations and central bank	25	245,818	15,674
Deposits and other financial liabilities to other customers	26	7,448,813	8,414,173
Changes in fair value of items subject to hedging		447	-
Subordinated liabilities	27	131,968	115,760
Provisions	28	17,381	14,626
Deferred tax liabilities	15(d)	4,087	1,434
Other liabilities	29	181,353	56,861
<b>TOTAL LIABILITIES</b>		<b>8,029,867</b>	<b>8,618,528</b>
<b>EQUITY</b>			
Share capital	30	3,672,407	3,672,407
Profit			30,358
Loss		(2,286,826)	(2,076,389)
Reserves		27,634	11,275
<b>TOTAL EQUITY</b>		<b>1,413,215</b>	<b>1,637,651</b>
<b>TOTAL LIABILITIES AND EQUITY</b>		<b>9,443,082</b>	<b>10,256,179</b>

The notes on pages 7 to 114  
are an integral part of these financial statements.

Andelka Stanković  
Responsible for financial statements  
preparation

Maćija Stepina  
Executive Board  
President

Radomir Stevanović  
Member of the Executive  
Board

**STATEMENT OF CHANGES IN EQUITY**  
**For the Year Ended 31 December 2019**

	Share capital	Reserves	Profit / (Loss)	In RSD thousand Total equity
Opening balance as of 1 January 2018	3,672,407	9,892	(2,076,389)	1,605,910
Profit for the year	-	-	30,358	30,358
<i>Other comprehensive result:</i>				
Negative effects of change in fair value of financial assets available-for-sale	-	(2,079)	-	(2,079)
Related deferred taxes recognised in equity (Note 15(d))	-	312	-	312
Allowance for impairment of financial assets measured through other comprehensive income	-	3,150	-	3,150
<b>Balance as of 31 December 2018</b>	<b>3,672,407</b>	<b>11,275</b>	<b>(2,046,031)</b>	<b>1,637,651</b>
Opening balance as of 1 January 2019	3,672,407	11,275	(2,046,031)	1,637,651
Loss for the year	-	-	(240,795)	(240,795)
<i>Other comprehensive result:</i>				
Positive effects of change in fair value of debt instruments measured at fair value through other result	-	14,538	-	14,538
Related deferred taxes recognised in equity (Note 15(d))	-	(2,653)	-	(2,653)
Allowance for impairment of financial assets measured through other comprehensive income	-	4,474	-	4,474
<b>Balance as of 31 December 2019</b>	<b>3,672,407</b>	<b>27,634</b>	<b>(2,286,826)</b>	<b>1,413,215</b>

The notes on pages 7 to 114  
are an integral part of these financial statements.

 Anelka Stanković Responsible for financial statements preparation	 Marija Stepina Executive Board President	 Radomir Stevanović Member of the Executive Board
--	---	---

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

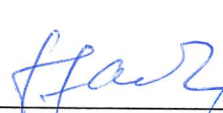
	2019	In RSD thousand 2018
<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>		
Cash inflow from operating activities	417,421	504,520
Interest receipts	295,830	411,994
Fee and commission receipts	111,906	82,961
Receipts from other operating activities	9,685	9,565
Cash outflow from operating activities	805,870	(633,281)
Interest paid	(114,084)	(108,301)
Fees and commission paid	(44,041)	(31,999)
Payments for gross salaries, compensations and other personal expenses	(324,301)	(209,738)
Taxes, contributions and other duties paid	(51,999)	(41,955)
Outflow for other operating expenses	(271,445)	(241,288)
<b>Net cash flows provided by / (used in) operating activities before increase or decrease in placements and deposits</b>	<b>(388,449)</b>	<b>(128,761)</b>
<b>Decrease in placements and increase in deposits and other liabilities</b>	<b>931,272</b>	<b>2,431,792</b>
Decrease in loans and placements to banks, other financial organizations, central banks and customers	931,272	2,204,887
Increase in deposits from banks, other financial organizations, central banks and customers	-	226,905
<b>Increase in placements and decrease in deposits and other liabilities</b>	<b>1,235,330</b>	<b>(668,091)</b>
Increase in loans and placements to banks, other financial organisations, central banks and customers	(113,402)	(54,112)
Increase in receivables from securities, derivatives and other non-investment financial assets	(168,917)	-
Decrease in deposits from and other liabilities to banks, other financial organizations, central bank and customers	(953,011)	(613,979)
<b>Net cash flows provided by / (used in) operating activities</b>	<b>(692,507)</b>	<b>1,634,940</b>
<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>		
Cash inflow from investing activities	-	-
Proceeds from investment securities	-	-
Cash outflow from investing activities	(26,801)	(970,224)
Purchase of investment securities	-	(944,565)
Purchase of intangible assets, property, plant and equipment	(26,801)	(25,659)
Other outflows from investing activities	-	-
<b>Net cash (used in)/from investing activities</b>	<b>(26,801)</b>	<b>(970,224)</b>
<b>CASH FLOWS FROM FINANCING ACTIVITIES</b>		
Cash inflow from financing activities	217,410	51,783
Proceeds from borrowings	217,410	51,783
Cash outflow from financing activities	(50,094)	(24,012)
Decrease in subordinated loans	-	-
Repayment of borrowings	(819)	(24,012)
Other outflows from financing activities	(49,275)	-
<b>Net cash flows provided by / (used in) financing activities</b>	<b>167,316</b>	<b>27,771</b>


2010 8 10


**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

Net increase/(decrease) in cash and cash equivalents	<u>(551,992)</u>	<u>692,487</u>
Cash and cash equivalents at the beginning of the year	1,969,175	1,826,732
Net foreign exchange gains	205,720	291,510
Cash and cash equivalents at the end of the year (Note 17)	<u>1,622,903</u>	<u>2,810,729</u>

The notes on pages 7 to 114  
are an integral part of these financial statements.

  
Anđelka Stanković  
Responsible for financial statements  
preparation

  
Marija Stepina  
Executive Board  
President

  
Radomir Stevanović  
Member of the Executive  
Board



**API BANK a.d. BELGRADE**

**NOTES TO THE FINANCIAL STATEMENT  
FOR THE YEAR 2019**

## CONTENT

	Page
<b>FINANCIAL STATEMENTS</b>	
Income Statement	1
Statement of Other Comprehensive Income	2
Balance Sheet	3
Statement of Changes in Equity	4
Statement of Cash Flows	5 - 6
Notes to the Financial Statements	7 - 114



**INCOME STATEMENT**  
**For the Year Ended 31 December 2019**

	Notes	2019	In RSD thousand 2018
Interest income	5	303,073	388,023
Interest expense	5	(115,264)	(111,020)
<b>Net interest income</b>		<b>187,809</b>	<b>277,003</b>
Fee and commission income	6	117,716	81,579
Fee and commission expense	6	(44,041)	(31,999)
<b>Net fee and commission income</b>		<b>73,675</b>	<b>49,580</b>
Net gains from derecognition of financial instruments measured at fair value		7,269	-
Net (losses)/gains from hedging	7	(447)	(1,104)
Net foreign exchange gains and effects of contracted foreign currency clause	8	189,959	311,068
Net impairment loss on financial assets not measured at fair value through profit or loss	10	(24,819)	(114,123)
Other operating income	9	2,097	1,466
<b>TOTAL NET OPERATING INCOME</b>		<b>435,543</b>	<b>523,890</b>
Salaries, compensations and other personal expenses	11	(338,537)	(211,270)
Amortisation and depreciation expenses	12	(72,866)	(23,241)
Other income	13	(10,980)	11,217
Other expenses	14	(276,548)	(271,896)
<b>PROFIT/(LOSS) BEFORE TAX</b>		<b>(241,428)</b>	<b>28,700</b>
<b>INCOME TAX</b>	15		
Deferred tax income		633	1,658
<b>PROFIT/(LOSS) FOR THE YEAR</b>		<b>(240,795)</b>	<b>30,358</b>

The notes on pages 7 to 114  
are an integral part of these financial statements.

Signed on behalf of the Bank's management on 16.April 2020, by:

\_\_\_\_\_  
Anđelka Stanković  
Responsible for financial statements  
preparation

\_\_\_\_\_  
Marija Stepina  
Executive Board  
President

\_\_\_\_\_  
Radomir Stevanović  
Member of the Executive  
Board

**STATEMENT OF OTHER COMPREHENSIVE INCOME**  
**For the Year Ended 31 December 2019**

	<u>2019</u>	<u>In RSD thousand 2018</u>
<b>PROFIT /(LOSS) FOR THE YEAR</b>	<b>(240,795)</b>	<b>30,358</b>
<b>Other comprehensive income:</b>		
<i>Items of other comprehensive income that can be reclassified to profit or loss:</i>		
Positive effects of change in value of debt instruments measured at fair value through other comprehensive income, net	<u>27,634</u>	<u>1,383</u>
<b>Total other comprehensive income, net of tax</b>	<u><b>27,634</b></u>	<u><b>1,383</b></u>
<b>TOTAL COMPREHENSIVE INCOME/(LOSS) FOR THE YEAR</b>	<u><b>(213,161)</b></u>	<u><b>31,741</b></u>

The notes on pages 7 to 114  
are an integral part of these financial statements.

\_\_\_\_\_  
Andelka Stanković  
Responsible for financial statements  
preparation

\_\_\_\_\_  
Marija Stepina  
Executive Board  
President

\_\_\_\_\_  
Radomir Stevanović  
Member of the Executive  
Board

**STATEMENT OF BALANCE SHEET**  
**For the Year Ended 31 December 2019**

		31 December 2019	In RSD thousand 31 December 2018
	Note		
<b>ASSETS</b>			
Cash and balances with central bank	17	1,622,903	1,969,175
Pledged financial assets		208,075	-
Securities	18	1,832,384	1,856,532
Loans and advances to banks and other financial organisations	19	1,084,546	1,996,367
Loans and advances to customers	20	3,993,011	3,912,191
Intangible assets	21	47,738	50,790
Property, plant and equipment	22(a)	139,458	26,564
Investment property	22(b)	19,610	19,873
Deferred tax assets	15(c)	6,123	5,491
Non-current assets held for sale and discontinued operations	23	376,516	375,484
Other assets	24	112,718	43,712
<b>TOTAL ASSETS</b>		<b>9,443,082</b>	<b>10,256,179</b>
<b>LIABILITIES</b>			
Deposits and other financial liabilities to banks, other financial organisations and central bank	25	245,818	15,674
Deposits and other financial liabilities to other customers	26	7,448,813	8,414,173
Changes in fair value of items subject to hedging		447	-
Subordinated liabilities	27	131,968	115,760
Provisions	28	17,381	14,626
Deferred tax liabilities	15(d)	4,087	1,434
Other liabilities	29	181,353	56,861
<b>TOTAL LIABILITIES</b>		<b>8,029,867</b>	<b>8,618,528</b>
<b>EQUITY</b>	30		
Share capital		3,672,407	3,672,407
Profit			30,358
Loss		(2,286,826)	(2,076,389)
Reserves		27,634	11,275
<b>TOTAL EQUITY</b>		<b>1,413,215</b>	<b>1,637,651</b>
<b>TOTAL LIABILITIES AND EQUITY</b>		<b>9,443,082</b>	<b>10,256,179</b>

The notes on pages 7 to 114  
are an integral part of these financial statements.

\_\_\_\_\_  
Anđelka Stanković  
Responsible for financial statements  
preparation

\_\_\_\_\_  
Marija Stepina  
Executive Board  
President

\_\_\_\_\_  
Radomir Stevanović  
Member of the Executive  
Board

**STATEMENT OF CHANGES IN EQUITY**  
**For the Year Ended 31 December 2019**

	Share capital	Reserves	Profit / (Loss)	In RSD thousand Total equity
<b>Opening balance as of 1 January 2018</b>	<b>3,672,407</b>	<b>9,892</b>	<b>(2,076,389)</b>	<b>1,605,910</b>
Profit for the year	-	-	30,358	30,358
<i>Other comprehensive result:</i>				
Negative effects of change in fair value of financial assets available-for-sale	-	(2,079)	-	(2,079)
Related deferred taxes recognised in equity (Note 15(d))	-	312	-	312
Allowance for impairment of financial assets measured through other comprehensive income	-	3,150	-	3,150
<b>Balance as of 31 December 2018</b>	<b>3,672,407</b>	<b>11,275</b>	<b>(2,046,031)</b>	<b>1,637,651</b>
<b>Opening balance as of 1 January 2019</b>	<b>3,672,407</b>	<b>11,275</b>	<b>(2,046,031)</b>	<b>1,637,651</b>
Loss for the year	-	-	(240,795)	(240,795)
<i>Other comprehensive result:</i>				
Positive effects of change in fair value of debt instruments measured at fair value through other result	-	14,538	-	14,538
Related deferred taxes recognised in equity (Note 15(d))	-	(2,653)	-	(2,653)
Allowance for impairment of financial assets measured through other comprehensive income	-	4,474	-	4,474
<b>Balance as of 31 December 2019</b>	<b>3,672,407</b>	<b>27,634</b>	<b>(2,286,826)</b>	<b>1,413,215</b>

The notes on pages 7 to 114  
are an integral part of these financial statements.

\_\_\_\_\_  
Anđelka Stanković  
Responsible for financial statements  
preparation

\_\_\_\_\_  
Marija Stepina  
Executive Board  
President

\_\_\_\_\_  
Radomir Stevanović  
Member of the Executive  
Board

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

	2019	In RSD thousand 2018
<b>CASH FLOWS FROM OPERATING ACTIVITIES</b>		
<b>Cash inflow from operating activities</b>	<b>417,421</b>	<b>504,520</b>
Interest receipts	295,830	411,994
Fee and commission receipts	111,906	82,961
Receipts from other operating activities	9,685	9,565
<b>Cash outflow from operating activities</b>	<b>805,870</b>	<b>(633,281)</b>
Interest paid	(114,084)	(108,301)
Fees and commission paid	(44,041)	(31,999)
Payments for gross salaries, compensations and other personal expenses	(324,301)	(209,738)
Taxes, contributions and other duties paid	(51,999)	(41,955)
Outflow for other operating expenses	(271,445)	(241,288)
<b>Net cash flows provided by / (used in) operating activities before increase or decrease in placements and deposits</b>	<b>(388,449)</b>	<b>(128,761)</b>
<b>Decrease in placements and increase in deposits and other liabilities</b>	<b>931,272</b>	<b>2,431,792</b>
Decrease in loans and placements to banks, other financial organizations, central banks and customers	931,272	2,204,887
Increase in deposits from banks, other financial organizations, central banks and customers	-	226,905
<b>Increase in placements and decrease in deposits and other liabilities</b>	<b>1,235,330</b>	<b>(668,091)</b>
Increase in loans and placements to banks, other financial organisations, central banks and customers	(113,402)	(54,112)
Increase in receivables from securities, derivatives and other non-investment financial assets	(168,917)	-
Decrease in deposits from and other liabilities to banks, other financial organizations, central bank and customers	(953,011)	(613,979)
<b>Net cash flows provided by / (used in) operating activities</b>	<b>(692,507)</b>	<b>1,634,940</b>
<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>		
<b>Cash inflow from investing activities</b>		-
Proceeds from investment securities	-	-
<b>Cash outflow from investing activities</b>	<b>(26,801)</b>	<b>(970,224)</b>
Purchase of investment securities	-	(944,565)
Purchase of intangible assets, property, plant and equipment	(26,801)	(25,659)
Other outflows from investing activities	-	-
<b>Net cash (used in)/from investing activities</b>	<b>(26,801)</b>	<b>(970,224)</b>
<b>CASH FLOWS FROM FINANCING ACTIVITIES</b>		
<b>Cash inflow from financing activities</b>	<b>217,410</b>	<b>51,783</b>
Proceeds from borrowings	217,410	51,783
<b>Cash outflow from financing activities</b>	<b>(50,094)</b>	<b>(24,012)</b>
Decrease in subordinated loans	-	-
Repayment of borrowings	(819)	(24,012)
Other outflows from financing activities	(49,275)	-
<b>Net cash flows provided by / (used in) financing activities</b>	<b>167,316</b>	<b>27,771</b>

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

<b>Net increase/(decrease) in cash and cash equivalents</b>	<b>(551,992)</b>	<b>692,487</b>
Cash and cash equivalents at the beginning of the year	1,969,175	1,826,732
Net foreign exchange gains	205,720	291,510
<b>Cash and cash equivalents at the end of the year</b> <b>(Note 17)</b>	<b>1,622,903</b>	<b>2,810,729</b>

The notes on pages 7 to 114  
are an integral part of these financial statements.

\_\_\_\_\_  
Anđelka Stanković  
Responsible for financial statements  
preparation

\_\_\_\_\_  
Marija Stepina  
Executive Board  
President

\_\_\_\_\_  
Radomir Stevanović  
Member of the Executive  
Board

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**1. CORPORATE INFORMATION**

API BANK a.d. BELGRADE, former VTB Banka a.d. Belgrade (hereinafter referred to as the "Bank") was established on 11 July 2008 pursuant to the Decision of the National Bank of Serbia no. 2158 dated 3 March 2008.

The founder and the sole shareholder of the Bank until 2011 was the Joint Stock Commercial Bank - Bank of Moscow, Moscow, Russian Federation (hereinafter referred to as the "Bank of Moscow, Moscow"). In 2011, there was a change in the ownership structure of the Bank's sole shareholder, therefore, as of that date, 95% of shares of the Bank of Moscow, Moscow were held by the Joint Stock Company "VTB Bank", Saint Petersburg, Russian Federation or its subsidiaries.

On 16 May 2013, the Agreement on Sale and Purchase of Shares was signed between the Bank of Moscow, Moscow, as the seller and the Joint Stock Company "VTB Bank", Saint Petersburg as the buyer. The subject of this transaction pursuant to the above Agreement was the sale of the Bank's shares. The agreement was implemented on the same day when the new shareholder of the Bank's shares - Joint Stock Company "VTB Bank", Saint Petersburg, Russian Federation, was registered with the Central Securities Depository and Clearing House.

Pursuant to the amendments to the Articles of Association dated 30 August 2013, and the Decision no. BD 99529/201, on 13 September 2013 the Bank was registered in the Company Register under the name of VTB Banka a.d. Belgrade. The Public Joint Stock Company "VTB Bank", Saint Petersburg, Russian Federation (hereinafter "JSC VTB Bank, Saint Petersburg") became the sole shareholder of the Bank.

Based on the transaction of sale of shares realised on 26 July 2018, the Central Securities Depository and Clearing House conducted a change of ownership over 100% of VTB Bank a.d. Belgrade shares, so that the company "AZRS INVEST" d.o.o. Belgrade, registration number 20988592, became the sole owner of the shares of the Bank. The change of ownership was made on the basis of the prior approval of the National Bank of Serbia, pursuant to the Decision G 2182 dated 22 March 2018. Based on the Decision of the Shareholders Assembly as of 24 September 2018, the Articles of Association and the Memorandum of Association were amended and the new business name of the Bank - API Bank a.d. Belgrade was established, as well as the sole owner of the Bank's shares ("AZRS INVEST" d.o.o. Belgrade). The ultimate owner of the Bank is a physical person - Andrey Zakharovich Shlyakhovoy. Changing the business name of the Bank into API Bank a.d. Belgrade was registered with the Serbian Business Registers Agency on 18 October 2018.

The Bank is registered in the Republic of Serbia for provision of a wide range of banking services related to payment transfers, credit and deposit activities in the country and abroad. In accordance with the Law on Banks, the Bank is obliged to operate under the principles of liquidity, security of placements and profitability.

The Bank's registration number is 20439866. Its tax identification number is 105701111. The Bank's Head Office is located in Belgrade, no. 2, Balkanska Street.

On 3 June 2009, the Bank opened its first branch in Belgrade, in no. 2, Balkanska Street, the status of which was changed in affiliate by the end of 2010.

On 22 November 2010, the Bank opened its first affiliate in Novi Sad, in no. 12, Narodnog fronta Street.

On 24 September 2013, the Bank opened its new branch in Belgrade, in no. 57, Kralja Milutina Street. Pursuant to the Decision of the Executive Board of the Bank dated 15 November 2016, the above mentioned branch was discontinued on 15 December 2016.

The Bank had 95 employees at 31 December 2019 (at 31 December 2018: 81 employees).

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**2. BASIS OF PREPARATION AND PRESENTATION OF THE FINANCIAL STATEMENTS**

**2.1. Basis of Preparation and Presentation of the Financial Statements**

The accompanying financial statements of the Bank as of and for the year ended 31 December 2019 have been prepared in accordance with International Financial Reporting Standards (IFRSs).

In accordance with the Law on Accounting ("RS Official Gazette", no. 62/2013 and 30/2018), banks are obliged to keep books of account and prepare financial statements in accordance with translated IFRSs, while, pursuant to the Law on Banks ("RS Official Gazette", no. 107/2005, 91/2010 and 14/20<sup>15</sup>), Article 50 paragraph 2, it is prescribed that, when compiling annual financial statements, banks should apply IFRSs as of the date the competent international authority determined as the date of application of these standards.

IFRSs include the following: Conceptual Framework for Financial Reporting, International Accounting Standards - IAS, International Financial Reporting Standards - IFRS and related amendments and interpretations issued by the International Accounting Standards Board (IASB) and/or the International Financial Reporting Interpretations Committee (IFRIC).

The accompanying financial statements have been prepared under the historical cost convention, except for financial assets measured at fair value through other comprehensive income.

The accompanying financial statements have been prepared in the form prescribed under the National Bank of Serbia Decision on Form and Content of Items in the Financial Statements for Banks ("RS Official Gazette", no. 101/2017, 38/2018 and 103/2018).

The Bank's financial statements are stated in thousands of Dinars, unless otherwise stated. The Dinar (RSD) is the functional and official reporting currency in the Republic of Serbia. All transactions in currencies that are not functional currency are considered to be transactions in foreign currency.

In the preparation of the accompanying financial statements the Bank adhered to accounting policies disclosed in Note 3.

The accounting policies and estimates adopted in the preparation of these financial statements are consistent with those followed in the preparation of the Bank's annual financial statements for the year ended 31 December 2019, except for newly adopted amended IAS, IFRS and interpretations (IFRIC) presented below.

**a) Standards and interpretations issued that came into effect in prior and current period according to the Decision on translation**

- Amendments to IFRS 7 "Financial Instruments: Disclosures" - Amendments improving disclosure of fair value and liquidity risk (revised March 2009, effective for annual periods beginning on or after 1 January 2009);
- Amendments to IFRS 1 "First-time Adoption of International Financial Reporting Standards" - Additional Exemptions for First-time Adopters. Changes related to assets in the oil and gas industry and determining whether contracts include leases (revised in July 2009, effective for annual periods beginning on or after 1 January 2010);
- Amendments to various standards and interpretations resulting from the annual improvement project of IFRS published on 16 April 2009 (IFRS 5, IFRS 8, IAS 1, IAS



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

7, IAS 17, IAS 36, IAS 39, IFRIC 16 primarily with a view to removing inconsistencies and clarifying wording (amendments are effective for annual periods beginning on or after January 1, 2010, and the amendment to IFRIC on or after 1 July 2009);

- Amendments to IAS 38 “Intangible Assets” (effective for annual periods beginning on or after 1 July 2009);
- Amendments to IFRS 2 “Share-based Payment”: Amendments resulting from the annual improvement project of IFRS (revised in April 2009, effective for annual periods beginning on or after 1 July 2009) and amendments relating to transactions share-based payment groups based on cash (as revised in June 2009, effective for annual periods beginning on or after 1 January 2010);
- Amendments to IFRIC 9 “Reassessment of Embedded Derivatives” effective for annual periods beginning on or after 1 July 2009 and IAS 39” Financial Instruments: Recognition and Measurement “- Embedded Derivatives (effective for annual periods beginning on or after 30 June 2009);
- IFRIC 18 “Transfers of Assets from Customers” (effective for annual periods beginning on or after 1 July 2009);
- “Conceptual Framework for Financial Reporting 2010” which is a modification of “Framework for the Preparation and Presentation of Financial Statements” (effective for transfer of assets from customers received on or after September 2010);
- Amendments to IFRS 1 “First-time Adoption of International Financial Reporting Standards” - Limited Exemption from Comparative disclosures prescribed in IFRS 7 persons First-time Adopters (effective for annual periods beginning on or after 1 July 2010);
- Amendments to IAS 24 “Related Party Disclosures” - Simplifying the disclosure requirements for persons under the (significant) control or influence government and clarifying the definition of related parties (effective for annual periods beginning on or after 1 January 2011);
- Amendments to IAS 32 “Financial Instruments: Presentation” - Accounting for rights to the new shares (effective for annual periods beginning on or after 1 February 2010);
- Amendments to various standards and interpretations “Improvements to IFRSs (2010)” resulting from the annual improvement project of IFRS published on 6 May 2010 (IFRS 1, IFRS 3, IFRS 7, IAS 1, IAS 27, IAS 34 and IFRIC 13) primarily with a view to removing inconsistencies and clarifying wording (most amendments are effective for annual periods beginning on or after 1 January 2011);
- Amendments to IFRIC 14 “IAS 19 - The Limit on a Defined Benefit Asset, Minimum Funding Requirements and their Interaction” Payment in advance the minimum funds required to finance (effective for annual periods beginning on or after 1 January 2011);
- IFRIC 19 “Extinguishing Financial Liabilities with Equity Instruments” (effective for annual periods beginning on or after 1 July 2010);
- Amendments to IFRS 1 “First-time Adoption of International Financial Reporting Standards” - Severe Hyperinflation and Removal of Fixed Dates for First-time Adopters (effective for annual periods beginning on or after 1 July 2011);

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

- Amendments to IFRS 7 “Financial Instruments: Disclosures” - Transfer of Financial Assets (effective for annual periods beginning on or after 1 January 2011);
- Amendments to IAS 12 “Income Taxes” - Deferred Tax: Recovery of funds which were used for the calculation of taxes (effective for annual periods beginning on or after 1 January 2012);
- IFRS 10 “Consolidated Financial Statements” (effective for annual periods beginning on or after 1 January 2013);
- IFRS 11 “Joint Arrangements” (effective for annual periods beginning on or after 1 January 2013);
- IFRS 12 “Disclosures of Involvement with Other Entities” (effective for annual periods beginning on or after 1 January 2013);
- Amendments to IFRS 10, IFRS 11 and IFRS 12 “Consolidated Financial Statements, Joint Arrangements and Disclosures of Involvement with Other Entities: the provisional application” (effective for annual periods beginning on or after 1 January 2013);
- IAS 27 (revised in 2011) “Separate Financial Statements” (effective for annual periods beginning on or after 1 January 2013);
- IAS 28 (Revised 2011) “Investments in associates and joint ventures” (effective for annual periods beginning on or after 1 January 2013);
- IFRS 13 “Fair Value Measurement” (effective for annual periods beginning on or after 1 January 2013);
- Amendments to IFRS 1 “First-time Adoption of International Financial Reporting Standards” - Government loans at an interest rate lower than the market (effective for annual periods beginning on or after 1 January 2013);
- Amendments to IFRS 7 “Financial Instruments: Disclosures” - Offsetting Financial Assets and Financial Liabilities (effective for annual periods beginning on or after 1 January 2013);
- Amendments to IAS 1 “Presentation of Financial Statements” - Presentation of Items of Other Comprehensive Income (effective for annual periods beginning on or after 1 July 2012).
- Amendments to IAS 19 “Employee Benefits” - Improvements to the Accounting for Post- employment Benefits (effective for annual periods beginning on or after 1 July 2014);
- Annual improvements for the period from 2009 to 2011, issued in May 2012, relating to various projects to improve IFRS (IFRS 1, IAS 1, IAS 16, IAS 32, IAS 34) primarily on eliminating inconsistencies and clarifying formulations (effective for annual periods beginning on or after 1 January 2013);
- IFRS 14 “Regulatory Deferral Accounts” (effective for annual periods beginning on or after 1 January 2016);
- IFRIC 20 “Stripping Costs in the Production Phase of a Surface Mine” (effective for annual periods beginning on or after 1 January 2013);

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

- IFRIC 21 “Levies” (effective for annual periods beginning on or after 1 January 2014);
- IFRIC 22 - the interpretation refers to foreign currency transactions when an entity recognizes a non-monetary asset or liability to pay or receive an advance, before the entity recognizes that asset, expense or income, after which that non-monetary asset or liability is recognized. The interpretation came into force on or after 1 January 2018, but earlier application is permitted.

**b) Published standards and interpretations effective in previous and current period not yet officially translated and adopted**

Until the date of preparation of the accompanying financial statements, the following IAS, IFRS and interpretations which are their integral parts, as well as their amendments, issued by International Accounting Standards Board and International Financial Reporting Interpretations Committee, and are, as such, applicable to the accompanying financial statements, but have not been officially adopted in the Republic of Serbia:

- Amendments to IAS 32 “Financial Instruments: Presentation” - Offsetting Financial Assets and Financial Liabilities (effective for annual periods beginning on or after 1 January 2014);
- Amendments to IFRS 10 “Consolidated Financial Statements”, IFRS 12 “Disclosure of interests in other entities” and IAS 27 “Separate Financial Statements” - Exemption from Consolidation of Subsidiaries under IFRS 10 (effective for annual periods beginning on or after 1 January 2014);
- Amendments to IAS 36 - “Impairment of Assets” Disclosure of the recoverable amount of non-financial assets (effective for annual periods beginning on or after 1 January 2014);
- Amendments to various standards and interpretations IFRS (IFRS 2, IFRS 3, IFRS 8, IFRS 13, IAS 16, IAS 24 and IAS 38) which are part of the IASBs annual improvements project 2010-2012 cycle, primarily through the elimination of inconsistencies and explanations of the text (effective for annual periods beginning on or after 1 July 2014);
- Amendments to various standards and interpretations IFRS (IFRS 1, IFRS 3, IFRS 13 and IAS 40) which are part of the IASBs annual improvements project 2011-2013 cycle, primarily through the elimination of inconsistencies and explanations of the text (effective for annual periods beginning on or after 1 July 2014);
- Amendments to IFRS 11 “Joint Arrangements” - Accounting for Acquisitions of Joint Ventures (effective for annual periods beginning on or after 1 January 2016);
- Amendments to IAS 16 “Property, Plant and Equipment” and IAS 38 “Intangible Assets” - Interpretation of accepted depreciation methods (effective for annual periods beginning on or after 1 January 2016);
- Amendments to IAS 16 “Property, Plant and Equipment” and IAS 41 “Agriculture” - Agriculture - Industrial plants (effective for annual periods beginning on or after 1 January 2016);
- Amendments to IAS 27 “Separate Financial Statements” - Equity method in the separate financial statements (effective for annual periods beginning on or after 1 January 2016).

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

- Amendments to IFRS 10 “Consolidated Financial Statements” and IAS 28 “Investments in Associates and Joint Ventures” - The sale or transfer of funds between the investor and its associates or joint ventures (effective for annual periods beginning on or after 1 January 2016).
- Amendments to IFRS 10 “Consolidated Financial Statements”, IFRS 12 “Disclosure of interests in other entities” and IAS 28 “Investments in Associates and Joint Ventures” - investing companies: Application exception of consolidation (effective for annual periods beginning on or after 1 January 2016).
- Amendments to IAS 1 “Presentation of Financial Statements” - Initiative for disclosure (effective for annual periods beginning on or after 1 January 2016).
- Amendments to various standards and interpretations IFRS (IFRS 5, IFRS 7, IAS 19 and IAS 34) which are part of the IASBs annual improvements project 2012-2014 cycle, primarily through the elimination of inconsistencies and explanations of the text (effective for annual periods beginning on or after 1 January 2016);
- Amendments to IAS 7 “Cash Flow Statement” - disclosure requirement that enables report users to assess changes in liabilities arising from financing activities (effective from 1 January 2017);
- Clarifications to IAS 12 “Profit Tax” aiming reduction of diversity in practice in treatment of deferred tax assets arise from unrealized losses (effective 1 January 2017);
- Amendments to IFRS 12 - Disclosures in Equity in Other Entities (effective from 1 January 2017);
- IFRS 16 “Lease” published in January 2016 effective for annual periods beginning on or after 1 January 2019. Current standard of IAS 17 will be replaced by this standard;
- IFRS 3 “Business Combinations” - amendment relates to clarifications when one party acquires control in previous joint venture. The change shall enter into force for business combinations which acquisition date is on or after the first annual reporting period beginning on or after 1 January 2019. It may be contrary to amendments to IFRS 11;
- IFRIC 23 - Interpretation for IAS 12. It shall enter into force on or after 1 January 2019, but earlier application is permitted;
- Clarifications for IFRS 11 relating to transactions in which entity obtains joint control at or after the commencement of the first annual reporting period beginning on or after 1 January 2019. It may be contrary to IFRS 3;
- Amendments to various standards and interpretations IFRS (IFRS 1, and IAS 28) which are part of the IASBs annual improvements project 2014-2016 cycle, primarily through the elimination of inconsistencies and explanations of the text (effective for annual periods beginning on or after 1 January 2018);
- Amendments to IFRS 2 “Share-based Payments” - clarifications on how to record certain types of share-based transactions (effective for annual periods beginning on or after 1 January 2018);
- Amendments to IFRS 4 “Insurance Contracts” - amendments related to Implementation of IFRS 9 ‘Financial Instruments’ (effective for annual periods beginning on or after 1 January 2018);

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

- Amendments to IAS 40 “Investment Property” - clarification of the principle of classification of investment property (effective for annual periods beginning on or after 1 January 2018);
- Amendments to IFRS 9 „Financial Instruments“ - defining the conditions for measuring financial assets at amortized cost or at fair value through other comprehensive results (effective for annual periods beginning on or after 1 January 2019);
- Amendments to IAS 28 “Investments in Associates and Joint Ventures” - clarification about recording of long-term investments in associates and joint ventures (effective for annual periods beginning on or after 1 January 2019);
- Amendments to various standards and interpretations IFRS (IFRS 3, IFRS 11, IAS 12, IAS 23) which are part of the IASBs annual improvements project 2015-2017 cycle, primarily through the elimination of inconsistencies and explanations of the text (effective for annual periods beginning on or after 1 January 2019);
- Amendments to IAS 19 Employee Benefits - defining how to calculate defined benefit plans when changes, limits, or settlements occur during the reporting period (effective for annual periods beginning on or after 1 January 2019).

**c) Published standards and interpretations that are not yet effective**

At day of publication these financial statements the following standards, amendments thereto and interpretations were in issue but not yet effective:

- In accordance with IFRS 9, financial assets will be classified into one of two categories listed at initial recognition: financial assets measured at amortized cost or financial assets measured at fair value. A financial asset will be recognized at amortized cost if the following two criteria are met: assets related to the business model, which aims to apply the agreed cash flows and contractual terms provide a basis for payment on certain dates the cash flows that are solely the collection of principal and interest on the principal outstanding. All other assets will be valued at fair value. Gains and losses on valuation of financial assets at fair value will be recognized in the income statement, except for investments in equity instruments with non trading, where IFRS 9 permits, at initial recognition, the selection of unchangeable later that all changes in fair value recognized in within other gains and losses in the statement of comprehensive income. The amount thus be recognized within the statement of comprehensive income will not be able later to be recognized in the income statement.
- IFRS 15 “Revenue from Contracts with Customers”, which defines the framework for the recognition of revenue. IFRS 15 supersedes IAS 18 “Revenue”, IAS 11 “Construction Contracts”, IFRIC 13 “Customer Loyalty Programmes”, IFRIC 15 “Agreements for the Construction of Real Estate” and IFRIC 18 “Transfers of assets from customers” and SIC-31 – Revenue - Barter Transactions Involving Advertising Services”. IFRS 15 is effective for annual periods beginning on or after 1 January 2018, with earlier application permitted;
- Amendments to IFRS 4 that relate to IFRS 9 and apply before applying IFRS 17 to replace IFRS 4;
- Amendments to IFRS 7 that relate to IFRS 9;
- IFRS 17 - Replaces IFRS 4 - application to financial statements beginning on 1 January 2021. Early application is conditioned by adoption of IFRS 9 and IFRS 15;

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

- Amendments to IFRS 3 “Business Combinations” - clarifying the definition of business (effective for annual periods beginning on or after 1 January 2020);
- Amendments to IAS 1 “Presentation of Financial Statements” and IAS 8 “Accounting Policies, Changes in Accounting Estimates and Errors” - mainly elimination of inconsistencies and clarification of formulations (effective for annual periods beginning on or after 1 January 2020);
- Revised Conceptual Framework for Financial Reporting determines the objective of financial reporting, general purposes, qualitative characteristics of useful financial information, description of reporting entity and limitations, definitions of assets, liabilities, equity, income and expenses and additional guidelines, criteria for recognition of assets and liabilities in the financial statements and guidelines for derecognition, presentation and disclosure concepts and guidelines, equity maintenance concept (effective for annual periods beginning after 1 January 2020).

The content and form of the financial statements and the contents of items are prescribed by the Rulebook on the content and form of the financial statements forms for companies, cooperatives and entrepreneurs (“RS Official Gazette”, Nos. 95/2014 and 144/2014).

The chart of accounts and the contents of account in chart of accounts are prescribed by the Rulebook on the chart of accounts and contents of accounts in chart of accounts for companies, cooperatives and entrepreneurs (“RS Official Gazette”, No. 95/2014 - hereinafter: the Chart of Accounts).

According to the Law on Accounting, the financial statements include: balance sheet, income statement, statement of other comprehensive income, cash flow statement, statement of changes in equity and notes to the financial statements.

In preparing these financial statements, the Company has adhered to the accounting policies disclosed in Note 3, based on the applicable accounting and tax regulations of the Republic of Serbia.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**2.2. Impact Assessment of IFRS 16 “Leases”**

IFRS 16 brings major changes for lessees and will have a significant effect on any entity that has entered into material amounts of what are currently accounted for as operating leases. In contrast, for lessors, the accounting requirements have largely been carried forward unchanged from IAS 17.

IFRS 16 specifies how an entity will recognize, measure, present and disclose leases. The standard provides a single lessee accounting model, requiring lessees to recognize assets and liabilities for all leases unless the lease term is 12 months or less or the underlying asset has a low value.

The key novelty for lessees is that in most cases a lease will result in an asset being capitalised (a “right of use” asset) together with the recognition of a liability for the corresponding lease payments. This will result in changes to key financial ratios and has the potential to affect borrowing costs (interest expenses).

As at the beginning of lease, a lessee recognizes a lease liability and an asset representing the right to use that asset during the period of lease (a “right of use” asset). Interest expense on lease liability and depreciation of the right of use asset should be separately recognized, as required.

It is necessary to remeasure the lease liability upon the occurrence of certain events (changes in lease term, future payments due to changes in index or rate applied to calculate those payments). Lessor recognizes the amount of remeasured lease liability as adjustment of value of a right of use asset.

In the case of operating leases terminating in the period of 12 months or less after the date of the first application of IFRS 16, there shall be no change in the accounting treatment, as well as to leases of low value. In such cases, the Bank will recognize the cost of leasing using a straight line basis, as permissible by the standard.

On transition, there is a choice of two approaches:

- Fully retrospective application under which IFRS 16 is applied with the cumulative effect being recognized as an adjustment of opening balance of the entity’s equity on 1 January 2018 with comparative information being restated; or
- Modified retrospective approach under which IFRS 16 is applied with the cumulative effect being recognized as an adjustment of the opening balance of the entity’s equity at the date of initial application i.e. on 1 January 2019 with comparative information not being restated.

The Bank chose the “modified retrospective approach” according to which the Bank will not restate its comparative data.

The Bank recognized assets (property) with the right of use in the amount of RSD 156,159 thousand, in accordance with the application of IFRS 16 in the balance sheet as of 1 January 2019, and the corresponding lease liability to all these leases.

The effects on the income statement in 2019 is a reduction in rental costs by RSD 47,630 thousand, an increase in depreciation costs by RSD 48,759 thousand, an increase in interest expense by RSD 2,201 thousand, increase in tax expense by RSD 9,607 thousand and an increase in positive exchange rate differences by RSD 697 thousand.

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**2. BASIS OF PREPARATION AND PRESENTATION OF THE FINANCIAL STATEMENTS**  
**(Continued)**

**2.2. Impact Assessment of IFRS 16 “Leases” (Continued)**

The summary of the estimated financial impact of the first adoption of IFRS 16 is presented in the table below:

	<u>01/01/2019</u>	<u><i>In RSD thousand</i></u> <u>31/12/2019</u>
Impact on the Bank's balance sheet:		
Right of use asset	156.159	107.400
Lease liabilities	156.159	109.585
Impact on the Bank's income statement:		
– Increase in depreciation costs		(48.759)
– Increase in interest expense		(2.201)
– Increase in tax expenses		(9.607)
– Increase in foreign exchange gains		697
– Decrease in rental costs		47.630
The overall effect on the Bank's income statement is increase in costs		12.240

The Bank decided to use the following practical solutions in assessing lease liabilities:

- use of a uniform discount rate on the lease portfolio with similar characteristics; and
- a lease that ends within a period of up to 12 months from the date of first adoption of the standard is characterised as a short-term lease.

In 2019, the Bank acted as follows:

- Modify internal processes, internal acts and internal controls related to recording of leases in line with IFRS 16;
- Modify and adopt new accounting policies in which it has included recording of business transactions in line with IFRS 16.

**2.3. Comparative Figures**

Comparative figures represent the audited financial statements of the Bank as of and for the year ended 31 December 2018, prepared in accordance with IFRS.



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**2. BASIS OF PREPARATION AND PRESENTATION OF THE FINANCIAL STATEMENTS**  
**(Continued)**

**2.4. Going Concern**

The accompanying financial statements of the Bank are prepared in accordance with the going concern principle, which assumes that the Bank will continue its operations in the foreseeable future, which includes a period of at least twelve months from the date of the financial statements.

In 2019, the Bank generated a net loss of RSD 240,795 thousand (2018: net profit in the amount of RSD 30,358 thousand).

In 2018, the Bank changed its owner, and accordingly the sole owner of the Bank's shares is the Company "AZRS INVEST" d.o.o. Belgrade, whose ultimate owner intends to strengthen the Bank's capital base in the following periods.

As of 31 December 2019, the regulatory capital of the bank calculated in accordance with the Decision on Capital Adequacy of Banks ("RS Official Gazette", no. 103/2016) amounts to RSD 1,442,054 thousand, i.e. EUR 12,263,115 according to the official median exchange rate prevailing as of the reporting date and is above the minimum amount of capital of EUR 10 million, prescribed by the Law on Banks ("RS Official Gazette", no. 107/2005, 91/2010 and 14/2015).

The management of the Bank is preparing an adequate Capital Management Plan in terms of processes for an internal assessment of capital adequacy, which will enable the implementation of further activities regarding a capital increase with the aim of increasing credit activities of the Bank and permanent provision of capital sufficient to cover all risks that the Bank will be exposed to in the ordinary course of business in the coming period.

Considering the foregoing, the management believes that the Bank has adequate resources and support from the owner to continue its operations for the foreseeable future.

**2.5. Use of Estimates**

The preparation of financial statements in accordance with IFRSs requires the use of certain critical accounting estimates. It also requires management to exercise its judgement in the process of applying the Bank's accounting policies. These estimates and related assumptions are based on information available as of the date of preparation of the financial statements. Actual results could differ from those estimates.

These estimates and underlying assumptions are reviewed on an ongoing basis, and changes in estimates are recognised in the periods in which they have become known.

The areas involving a higher degree of judgement or complexity, or areas where assumptions and estimates are significant to the financial statements are disclosed in Note 4.

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

**3.1. Interest Income and Expense**

Interest income and expense, including penalty interest and other income and other expenses from interest bearing assets, i.e., liabilities are recognised on an accrual basis based on obligatory terms defined by a contract signed between the Bank and a customer.

From 1 January 2019, interest income and expense are recognised in the income statement using the effective interest method, which represents a rate that accurately discounts the estimated future payments or receipts through the expected life of the financial instrument, to:

- Gross carrying amount of a financial asset (amortised cost net of expected credit losses); or
- the amortized value of a financial liability.

When calculating the effective interest rate for financial instruments that have not been credit impaired at the time of approval, nor have they undergone significant modification of contracted cash flows as purchased or originated credit-impaired (POCI), the Bank estimates future cash flows taking into account all contractual terms of a financial instrument, but excluding expected credit losses. In the case of loans that are POCI, an effective interest rate adjusted for credit risk, using estimated future cash flows that include expected credit losses is calculated.

Interest income is recognized for financial assets that are measured at amortised cost as well as debt instruments at fair value through other comprehensive income.

Loan origination fee, which constitutes a part of the effective interest rate, is recorded in income and interest expense. Loan origination fees, that are calculated and charged on a one-off basis in advance, are deferred and discount using the effective interest method, over the life of the loan.

Interest expense is recognized for financial liabilities that are measured at amortised cost. Interest expense on deposits is deferred and recognized in the income statement in the period to which it relates.

Loan origination fees are accrued on a pro rata basis over the loan repayment period and recognized in the income statement under interest income.

If a financial asset is impaired on the basis of impairment loss, interest income continues to be calculated using the effective interest rate used to discount future cash flows for the purpose of measuring and calculating the impairment loss.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.2. Fee and Commission Income and Expense**

The Bank earns/pays fee and commission from rendering and using the banking services. Fees and commissions are generally recognised on an accrual basis when the service has been provided, i.e. rendered.

Fees and commissions mostly comprise fees for payment operations services, issued guarantees and other banking services.

Fees and commission expenses are mainly related to fees based on transactions and services performed and are recorded at the time of receiving the service.

Fee income can be divided into the following two categories:

*i. Fee Earned from Services that are Provided over a Certain Period of Time*

Fees earned for the provision of services over time are accrued over that period.

*ii. Fee from Providing Transaction Services*

Fees or components of fees that are linked to provision of certain services are recognised after fulfilling the corresponding criteria.

Income and expenses from fees and commissions that are an integral part of the effective interest rates of financial assets or liabilities are included in determining the effective interest rate and are recognised in the income statement as interest income.

Income from fees and commissions for banking services are recognised on an accrual basis and recognised in the period when they are realised or when the service is provided. Fees and commissions mostly comprise fees for payment services, buying and selling of foreign currency, the fee for the account maintenance and other banking services.

The fees for the issuance of guarantees and other warranties are deferred over the period of guarantees or warranties using the proportional accounting method and recognised in the income statement as income from fees.

**3.3. Foreign Currency Translation**

The items included in the Bank's financial statements are valued by using currency of the Bank's primary economic environment (functional currency).

The accompanying financial statements are stated in thousands of Dinars (RSD), which represents the functional and official reporting currency in the Republic of Serbia.

Transactions denominated in foreign currency are translated into Dinars at the official median exchange rate determined in the Interbank Foreign Currency Market, prevailing at the transaction date.

Monetary assets and liabilities denominated in foreign currency at the balance sheet date are translated into Dinars at the official median exchange rates published by the National Bank of Serbia, prevailing at the reporting date (Note 40).

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.3. Foreign Currency Translation (Continued)**

Foreign exchange gains or losses arising upon the translation of balance sheet items denominated in foreign currencies and transactions in foreign currencies are credited or charged as appropriate, to the income statement, as foreign exchange gains or losses (Note 8).

Gains and losses arising on translation of financial assets and liabilities indexed with the contracted foreign currency clause are recorded in the income statement within foreign exchange gains/losses and effects of contracted foreign currency clause (Note 8).

Commitments and contingencies denominated in foreign currency are translated into Dinars at the official median exchange rate determined on the Interbank Foreign Currency Market, prevailing at the balance sheet date.

**3.4. Financial Instruments**

**3.4.1 Initial Recognition**

All financial instruments are initially recognised at fair value increased by transaction costs (except for financial assets and financial liabilities at fair value through profit and loss), that are directly attributable incremental costs of acquisition or issue.

Financial assets and financial liabilities are recognised in the Bank's balance sheet on the date upon which the Bank becomes counterparty to the contractual provisions of a specific financial instrument.

Regular purchase or sale of financial assets is recognised by applying calculation on the date of settlement, i.e., the date when the asset is delivered to the counterparty.

**3.4.2. Derecognition of Financial Assets and Financial Liabilities**

Financial assets cease to be recognised when the Bank loses control of the contractual rights governing such instruments, which occurs when the rights and risks of use of such instruments have been transferred, or did not transfer or retained all risks and rights in relation to the assets, but has transferred the control over it.

Apart from the aforementioned criteria, implementation of IFRS 9 from 1 January 2018 specifies additional criteria that lead to derecognition of financial assets. Financial asset is derecognised when it is written-off. Also, derecognition of a financial asset will occur if subsequent changes of contractual terms of financial assets arisen, leading to significant modification of financial asset's cash flows.

A financial liability is derecognized when the obligation under the liability is fulfilled, cancelled or expires. Where an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such exchange or modification is treated as a derecognition of the original liability and the recognition of a new liability, while the difference in the respective carrying amounts is recognized in profit or loss.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.4. Financial Instruments (Continued)**

**3.4.2. Derecognition of Financial Assets and Financial Liabilities (Continued)**

In addition to the above mentioned criteria, implementation of IFRS 9 specifies additional criteria for derecognition of financial liability when the contractual terms are modified, while cash flows of modified liability are significantly changed. In that case, new financial liability is based on the modified terms and is recognised at fair value. Difference between carrying amount of financial liability and new financial liability with modified terms is recognised in profit or loss.

**3.4.3 Classification of Financial Instruments**

In accordance with IFRS 9, the classification of financial assets into individual categories sets out the rules for their initial recognition and subsequent measurement of the value of those assets, as well as the accounting treatment of the effects of the change in value upon subsequent measurement and impairment of the value of financial assets, based on two criteria that have the same importance in determining the category for classification:

- business model of the Bank for managing financial assets; and
- contracted characteristics of cash flows for the specific financial assets.

The classification of financial assets is based on the Bank's business model for managing these assets. The business model for managing financial assets reflects the way in which the Bank manages funds to generate cash flows.

In accordance with IFRS 9, financial assets are classified into one of the following categories:

- financial assets that are subsequently measured at amortised cost - the business model is the collection of cash flows and cash flows represent only the payment of principal and interest on the outstanding principal amount;
- financial assets subsequently measured through other comprehensive result (FVTOCI) - the business model is the collection of cash flows, and sales and cash flows represent only the payment of principal and interest on the outstanding principal amount;
- financial assets subsequently measured at fair value through profit or loss (FVTPL)
- all other financial instruments.

At initial recognition, IFRS 9 permits to indicate that a particular financial asset is measured at fair value through profit or loss, if it eliminates or significantly reduces the accounting non-compliance.

In accordance with IFRS 9, the following business models are defined:

1. a business model aimed at holding funds for the collection of contracted cash flows;
2. a business model aimed at collecting contracted cash flows as well as selling financial assets; and
3. a business model that refers to the financial assets acquired for the purpose of generating an inflow through their sale (financial assets traded).

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.4. Financial Instruments (Continued)**

**3.4.3 *Classification of Financial Instruments (Continued)***

A business model whose purpose is to hold funds for the collection of contracted cash flows mainly relates to debit/credit funds, since cash flows are realized by collecting contractual principal and interest payments over the life of a financial instrument. This business model also implies the possible sale of financial assets when there is an increase in the credit risk of the asset or for other reasons determined by proven information.

A business model aimed at collecting contracted cash flows as well as selling financial assets implies that the management has made the decision that the collection of contracted cash flows and the sale of financial assets constitute an integral part of achieving the goal within the business model. The goal of this business model can be management in the way of providing funds for the needs of current liquidity or maintaining the expected interest yield.

A business model that relates to the financial assets that are acquired to generate inflows through sale essentially relates to financial assets traded.

**Cash Flow Characteristics**

The Bank classifies its financial assets based on the characteristics of its contracted cash flows. The characteristics of cash flows that the financial assets will generate are determined by the type of contract and the contractual provisions based on which these assets are acquired. These characteristics differ in certain credit, debt and equity instruments.

If financial assets are held within the first two business models, it is first necessary to determine whether the contractual terms of the financial asset on specified dates generate cash flows that exclusively constitute payments of principal and interest calculated on the remaining portion of the principal.

Principal is the fair value of the financial asset at initial recognition. Depending on the agreed arrangement, the amount of the principal may change over the life of the financial asset when the principal is repaid.

Interest consists of compensation for the time value of money, for credit risk attributable to the remaining principal amount over a specified period of time and for other basic risks and costs of the loan (loan), as well as for the profit margin.

The time value of money is an element of interest that provides compensation only for the flow of time, i.e., the element of time value of money does not provide compensation for other risks or costs associated with holding a financial asset.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.4. Financial Instruments (Continued)**

**3.4.4. Measurement of Financial Instruments**

**Initial Recognition of Financial Instruments**

All financial instruments are initially measured at fair value increased/decreased by transaction costs, except for financial assets or financial liabilities at fair value through profit or loss. For financial assets that are measured at fair value through other comprehensive income, fair values include transaction costs.

**Subsequent Measurement of Financial Instruments**

Subsequent measurement of financial instruments is directly influenced by the fulfilment of the following criteria: the business model used in the management of financial assets and the characteristics of contracted cash flows.

Financial assets are classified into three categories:

1. financial assets that are subsequently measured at amortized cost;
2. financial assets that are subsequently measured at fair value through profit or loss (FVTPL); and
3. financial assets that are subsequently measured through other comprehensive income (FVOCI).

***Financial Assets that are Subsequently Measured at Amortised Cost***

Financial assets are subsequently measured at amortized cost when both of the following conditions are met:

- a) Asset is held within a business model whose objective is to hold assets to collect contractual cash flows; and
- b) The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest, calculated on the remaining portion of the principal.

This category includes financial assets with fixed or determinable amounts of payment and with fixed maturity for which there is the Bank's intention and ability to hold to maturity, such as: loans and receivables, bonds or notes, time deposits and other financial assets not intended for sale, although sales that are not frequent and in non- significant amounts are not in contrast to the business model.

The depreciated value of a financial asset or financial liability is defined as the amount at which the financial asset or financial liability is measured at initial recognition, net of principal payments, plus the addition or subtraction of cumulated depreciation using the effective interest method for all differences between the initial amount and the amount on the maturity date, with an adjustment for losses provisions (impairment losses).

To determine whether a financial asset meets the conditions for measurement at the amortized cost, the SPPI test is used to assess the contractual characteristics contained in a financial instrument in the sense that the contractual cash flows must be exclusively for principal and interest payments. This test is performed for each instrument separately. Equity instruments or capital instruments cannot be classified in this category because they do not contain elements of principal and interest.

STATEMENT OF CASH FLOWS  
For the Year Ended 31 December 2019

---

3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)

3.4. Financial Instruments (Continued)

3.4.4. *Measurement of Financial Instruments (Continued)*

*Financial Assets that are Subsequently Measured at Amortised Cost (Continued)*

The test is used to determine contractual characteristics that deviate from the criteria for paying only principal and interest. The SPPI test includes an assessment of whether a financial asset contains a contractual provision that can alter the amount or dynamics of contractual cash flows in a manner that does not comply with the above mentioned condition. When contractual terms introduce risk or variation in a way that does not comply with the underlying lending arrangement, that financial asset is measured at fair value through profit and loss account (FVTPL).

An effective interest rate is the rate that accurately discounts the estimated future cash payments or receipts over the expected term of the financial asset or financial liability to the gross carrying amount of the financial asset or the depreciable amount of the financial liability.

Fees that are an integral part of the effective interest rate of a financial instrument are treated as adjustments to the effective interest rate, except when the financial instrument is measured at fair value, whereby the change in fair value is recognized in the income statement. In such cases, fees are recognized as income or expense in the initial recognition of the instrument.

Expected losses for assets classified at amortised cost are recognized as allowance for impairment/impairment of these assets.

The amount of the allowance for balance sheet receivables was determined as the difference between the carrying amount of the receivable and the carrying value of the expected future cash flows. In order to determine the present value of the expected future cash flows, the Bank used as the discount factor the effective interest rate from the agreement on the approval of the engagement.



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.4. Financial Instruments (Continued)**

**3.4.4. Measurement of Financial Instruments (Continued)**

***Financial Assets that are Subsequently Measured through Other Comprehensive Income (FVOCI)***

A financial asset is measured at fair value through other comprehensive income when both of the following requirements are met:

- a) The asset is held within the business model whose objective is achieved by both collecting contractual cash flows and selling contractual assets, and
- b) The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the outstanding principal.

Equity and debt instruments can be classified under certain conditions in this category of financial assets. By applying this model, the management decides for each specific financial instrument to ensure that the holding of debt assets generates an inflow by collecting contracted cash flows (principal and interest), and for equity or capital instruments - a dividend inflow, i.e. when an inflow from selling assets is realised.

Expected losses that are determined for the financial assets based on the amortised value are included in the other comprehensive income. At each reporting date, provision for impairment losses for a financial instrument is carried out for the amount of expected loan losses over the life of the instrument, or during the expected twelve-month credit losses.

For financial assets classified in the category of measurement through other comprehensive income, the equity accounts reflect the effects of changes in their fair value, and for credit assets on these accounts, provisions for expected losses on credit risk are disclosed, other than gains and losses due to impairment values and exchange rate differences, until the end of recognition or reclassification of a financial asset.

In the event that a financial asset is derecognised, the accumulated gain or loss previously recognized in other comprehensive income is transferred from equity to the income statement as reclassification due to adjustments. Interest calculated using the effective interest method is recognised in the income statement.

***Financial Assets Measured at Fair Value Through Profit or Loss (FVTPL)***

These financial instruments are classified as all other instruments or the business model is collection of cash flows through trading instruments.

A financial asset should be measured at fair value through profit or loss unless it is measured at amortised cost or at fair value through other comprehensive income. However, the Bank may make an irrevocable choice when initially recognising certain investments in equity instruments that would otherwise be measured at fair value through profit or loss, subsequently showing changes in fair value in other comprehensive income.

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.4. Financial Instruments (Continued)**

**3.4.4. Measurement of Financial Instruments (Continued)**

***Financial Assets Measured at Fair Value Through Profit or Loss (FVTPL) (Continued)***

A financial asset classified as at fair value through profit and loss is initially measured at fair value - the transaction price, while transaction costs are not included in fair value, but are treated as expense of the period.

Subsequent measurement of these assets is made at each reporting date by comparing the fair value of a financial asset with its carrying amount, while differences in fair value change are recorded as gains or losses through the income statement.

***Equity Instruments***

All equity instruments in accordance with IFRS 9 should be measured at fair value through profit or loss, except for those investments in equity for which it is selected to be displayed through the statement of other comprehensive income.

For equity instruments held for trading, it is compulsory to be measured at fair value, whereby any difference between the carrying amount (being the last established fair value) and the fair value at the reporting date is the profit or loss that is included in the income statement.

Financial assets that are an equity instrument that the management intends to hold for a longer period may irrevocably be recognised at initial recognition as financial assets at fair value through other comprehensive income (FVTOCI). In the subsequent measurement of the fair value change, it does not affect the result. The amounts recognized through equity are never reclassified through the income statement, but they can be transferred within equity.

IFRS 9 requires that all investments in equity instruments and contracts for such investments are measured at fair value. However, paragraph B5.2.3 states that in limited circumstances, cost may be an appropriate estimate of fair value. This can be the case if insufficient information from a close past is available for fair value measurement, or if there is a wide range of possible fair value measurements that makes the purchase price the best estimate of fair value in that range.

Cost can never be used to determine the fair value of investments in quoted equity instruments or quoted equity instruments contracts.

***Derivatives and Hybrid Financial Assets***

Derivatives are measured at fair value, and gains/losses on the change in fair value are recorded in the income statement. Hybrid financial assets are always assessed and presented as a whole. Hybrid financial assets are measured at amortised cost if the cash flows generated by the asset represent repayments of principal and interest payments, i.e. at fair value if this is not the case.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.4. Financial Instruments (Continued)**

**3.4.4. Measurement of Financial Instruments (Continued)**

***Subsequent Measurement of Financial Liabilities***

Financial liabilities are classified as:

- financial liabilities measured at amortised cost; and
- financial liabilities measured at fair value through profit or loss (FVTPL).

Liabilities that are irrevocably classified as at fair value through profit or loss at initial recognition are related to the credit risk of a liability in respect of the accounting treatment of the effects of changes in that credit risk.

The amount of a change in the fair value of a financial liability that may be attributable to changes in the credit risk of that liability may be reported in other comprehensive income, and the remaining amount should be presented in the income statement unless this would result in an accounting inconsistency in the income statement.

The Bank has classified its liabilities into the category of financial liabilities that are measured at amortised cost.

**3.4.5. Reclassification of Financial Assets**

Reclassification is required only if the business model goal changes so that its previous assessment can no longer be applied to financial assets measured as FVTPL, FVTOCI and at amortised cost. Reclassification is made only for debt instruments while it is not envisaged for equity instruments, as well as reclassification of financial liabilities.

Reclassification is not allowed for equity instruments measured as FVTOCI, or in any circumstances in which the fair value option is applied to financial assets or financial liabilities.

Reclassification should be applied prospectively from the date of reclassification which is defined as the first day of the first reporting period after the change in the business model.

If the financial assets are reclassified from the model in which they are measured at amortized cost to the category at which they will be measured at fair value through profit or loss, then their fair value must be determined on the date of reclassification. Any gain or loss arising from the difference between the amortised and fair value is recognized in the income statement.

If a financial asset is reclassified from a business model in which it is valued at fair value in a business model in which it will be valued at amortised cost, then its last fair value is considered its current value.

Any reclassification carried out should be published with reference to: the date of reclassification and the value of the reclassified assets in each of the categories, the reasons for the reclassification and the quantification of the impact of the reclassification on the reported financial and yield position.

STATEMENT OF CASH FLOWS  
For the Year Ended 31 December 2019

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.4. Financial Instruments (Continued)**

**3.4.6. *Interest Income Arising from Financial Instruments***

Interest income in accordance with IFRS 9 is recognized differently according to the status of a financial asset in relation to the expected credit losses.

In the case of financial assets not purchased or initially recognized impaired, and for which there is no clear evidence of impairment on the reporting date, interest income is recognized using the effective interest rate method to the gross carrying amount of a financial asset.

In the case of financial assets not purchased or impaired at initial recognition, and for which there have been significant decrease in their credit quality, interest income is recognised using the effective interest rate method to the gross carrying amount of a financial asset.

In the case of the impaired financial assets, including purchased or impaired at initial recognition, and which contained objective evidence of impairment at initial recognition, interest income is recognized using the effective interest rate method on amortised cost (net base of the financial asset).

**3.4.7. *Write-off***

The Bank shall directly reduce the gross carrying amount of a financial asset when the entity has no reasonable expectations of recovering a financial asset in its entirety or a portion thereof. A write-off constitutes a derecognition event.

**3.4.8. *Modification of Contractual Cash Flows***

When the contractual cash flows of a financial asset are renegotiated or otherwise modified and the renegotiation or modification does not result in the derecognition of that financial asset, an entity shall recalculate the gross carrying amount of the financial asset and recognise a modification gain or loss in profit or loss.

The gross carrying amount of the financial asset shall be recalculated as the present value of the renegotiated or modified contractual cash flows that are discounted at the financial asset's original effective interest rate (or credit-adjusted effective interest rate for purchased or originated credit-impaired financial assets) or, when applicable, the revised effective interest rate. Any costs or fees incurred adjust the carrying amount of the modified financial asset and are amortised over the remaining term of the modified financial asset.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.4. Financial Instruments (Continued)**

**3.4.9. *Gains or Losses on Financial Instruments***

A gain or loss on a financial asset or financial liability that is measured at fair value shall be recognised in profit or loss unless, it is part of a hedging, it is an investment in an equity instrument and related gains and losses are presented within other comprehensive income, when it is a financial liability designated as at fair value through profit or loss and the entity is required to present the effects of changes in the liability's credit risk in other comprehensive income or it is a financial asset measured at fair value through other comprehensive income and the entity is required to recognise certain changes in fair value in other comprehensive income.

Gain or loss on a financial asset that is measured at fair value through other comprehensive income is recognized in comprehensive income, except for gains or losses due to impairment and foreign exchange gains and losses, until the derecognition or reclassification of a financial asset. Upon the cessation of recognition of a financial asset, the accumulated profit or loss previously recognized in other comprehensive income is reclassified from equity to the income statement as reclassification due to adjustments.

If a financial asset is reclassified from the fair value measurement through other comprehensive income category, the accumulated profit or loss previously recognised in other comprehensive income should be recorded. Interest calculated using the effective interest method is recognised in the income statement. If a financial asset is measured at fair value through other comprehensive income, the amounts recognized in the income statement are the same as the amounts that would be recognized in the income statement had the financial asset been measured at amortised cost.

If a financial instrument is designated at fair value through profit or loss after its initial recognition, or if it had not previously been recognized, the difference between the carrying amount and the fair value, if any, should be recognised immediately in the income statement.

For financial assets that are measured at fair value through other comprehensive income, accumulated gains or losses previously recognised in other comprehensive income should be immediately reclassified from equity to income statement as a reclassification due to adjustments.

**3.5. Reserves for Estimated Losses on Bank Balance Sheet Assets and Off-balance Sheet Items**

Reserves for estimated losses on balance sheet assets and off-balance sheet items are calculated in accordance with the National Bank of Serbia's Decision on the Classification of Bank Balance Sheet Assets and Off-balance Sheet Items ("RS Official Gazette", no. 94/2011, 57/2012, 123/2012, 43/2013, 113/2013, 135/2014, 25/2015, 38/2015, 61/2016, 69/2016, 91/2016, 101/2017 and 114/2017).

Pursuant to the Decision on amendments to the Decision on the Classification of Bank Balance Sheet Assets and Off-Balance Sheet Items ("RS Official Gazette" No. 103/2018), the National Bank of Serbia has abolished required reserve for estimated losses and deductible item of equity in accordance with the Decision on Capital Adequacy of the Bank.

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.6. Cash and Cash Equivalents**

Cash and cash equivalents include cash on hand and sight deposits (gyro account and foreign currency accounts) with banks in the country and abroad and cash equivalents consisting of highly liquid short-term investments that can be cashed immediately with insignificant risk of reduced value, deposits with the National Bank of Serbia and short-term securities for refinancing with the National Bank of Serbia.

For the purposes of the statement of cash flows, cash and cash equivalents comprise cash on hand, gyro account with the National Bank of Serbia and current accounts with other banks and instruments in the collection procedure.

**3.7. Repurchase Agreements**

Securities bought under agreements to repurchase at a specified future date ('repos') are recognised in the balance sheet. The corresponding cash given, including accrued interest is recognised in the balance sheet. The difference between the sale and repurchase prices is treated as interest income and is accrued over the life of the agreement.

**3.8. Intangible Assets**

Intangible assets comprise software, licenses and other intangible assets. Intangible assets are initially recognised at cost.

After the initial recognition, intangible assets are stated at cost less accumulated amortisation and accumulated impairment losses, if any.

The useful lives of intangible assets are assessed to be either finite or indefinite. Intangible assets with finite useful lives are amortised over the useful economic life. The amortisation period and the amortisation method for an intangible asset with a finite useful life are reviewed at least once a year, at the financial year-end.

Changes in the expected useful life or the expected pattern of consumption of future economic benefits embodied in the asset are accounted for by changing the amortisation period or method, as appropriate, and treated as changes in accounting estimates.

The amortisation of intangible assets with finite useful lives is recognised in the income statement (Note 12).

Amortisation of intangible assets is calculated using the straight-line method to write down the cost of intangible assets over their estimated useful lives, as follows:

- Software licenses 3 to 5 years
- Other intangible assets 3 to 5 years

Costs associated with developing and maintaining computer software programs are recognised as an expense as incurred.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.9. Property, Plant and Equipment and Investment Property**

***i. Property, Plant and Equipment***

Property, plant and equipment of the Bank at 31 December 2019 comprise equipment and leasehold improvements.

Items of property, plant and equipment which fulfil the requirements to be recognised as assets are initially recognised at cost, which includes all directly attributable costs of bringing the assets to the location and condition necessary to function.

After the initial recognition, property, plant and equipment are stated at cost less accumulated depreciation and accumulated impairment losses, if any.

Subsequent costs are included in the asset's carrying amount or are recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Bank and the cost of the item can be measured reliably.

All other repairs and maintenance are charged to income statement of the financial period in which they are incurred.

Depreciation is provided for on a straight-line basis to the cost of fixed assets, using the following prescribed annual rates, in order to write them off over their useful lives:

- Computer equipment    up to 4 years
- Other equipment        7 to 14 years

The useful lives of the assets are reviewed and adjusted if necessary at each balance sheet date. Changes in the expected useful lives of assets are accounted for as changes in the accounting estimates.

Calculation of depreciation of equipment commences at the beginning of month following the month when an asset is put into use. Assets under construction are not depreciated. Depreciation charge is recognised as an expense for the period when incurred (Note 12).

The calculation of the depreciation of property, plant and equipment and amortisation of intangible assets for tax purposes is determined by the Corporate Income Tax Law of the Republic of Serbia ("RS Official Gazette", no. 25/2001, 80/2002, 43/2003, 84/2004, 18/2010, 101/2011, 119/2012, 47/2013, 108/2013, 68/2014, 142/2014, 91/2015, 112/2015, 113/2017 and 95/2018) and the Rules on the Manner of Fixed Assets Classification in Groups and Depreciation for Tax Purposes ("RS Official Gazette", no. 116/2004, 99/2010 and 93/2019). Different depreciation methods used for the financial reporting purposes and the tax purposes give rise to deferred taxes (Note 15(c)).

Gains or losses arising on the disposal or sale of equipment are credited/debited to the income statement, as part of other operating income or other expenses, in the amount of the difference between the cash inflow and the carrying amount of the asset.

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.9. Property, Plant and Equipment and Investment Property (Continued)**

*ii. Investment Property*

Investment property is a property held by the Bank for the purpose of generating profit from its lease or increasing the capital value or both, but not for administrative operations or to be sold in the ordinary course of business.

After the initial recognition at cost, subsequent measurement of the investment property is performed at cost less accumulated depreciation.

**3.10. Impairment of Non-financial Assets**

In accordance with the adopted accounting policy, at each balance sheet date, the Bank's management reviews the carrying amounts of the Bank's intangible assets and property, plant and equipment. If there is any indication that such assets have been impaired, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss.

If the recoverable amount of an asset is estimated to be lower than its carrying value, the carrying amount of the asset is reduced to its recoverable amount, being the higher of an asset's fair value less costs to sell and value in use.

Impairment losses, representing a difference between the carrying amount and the recoverable amount of property, plant and equipment and intangible assets, are recognised in the income statement as required by IAS 36 "Impairment of Assets".

Non-financial assets (other than goodwill) that suffered impairment are reviewed for possible reversal of the impairment at each reporting date.

**3.11. Repossessed Property**

Property which is repossessed following the foreclosure on loans that are impaired is reported within other assets. Assets acquired through the collection of receivables are temporarily held for liquidation and are stated at the lower of carrying amount and fair value less costs to sell.

**3.12. Non-current Assets Held for Sale**

Non-current assets (or disposal groups) are recognised as held for sale if the Bank expects to recover their carrying value principally through a sale transaction rather than through continuing use, and when the general recognition criteria for recognition in accordance with the requirements of IFRS 5 "Non-current Assets Held for Sale and Discontinued Operations" are met.

A non-current asset is classified as held for sale if the following criteria are met:

- An asset (or disposal group) is available for immediate sale in its current condition;
- There is an adopted plan of sale of fixed assets and the activities on the achievement of the sales plan have been initiated;
- There is an active market for such asset and the asset is already active in this market; and
- The probability of sale is very high, or there is an expectation that a sales transaction will be realised within a period of one year from the date of classification of the asset as held for sale.

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

Non-current asset held for sale is initially measured at the lower of the carrying value or market (fair) value less costs to sell. From the moment of classification of an asset as held for sale, the calculation of depreciation of these assets shall cease.

If there is a change in the plan of sales, the non-current asset ceases to be classified as held for sale and, in that case, the non-current asset is valued at the lower of the following two values:

- Carrying value of the asset, prior to being classified as held for sale, adjusted for the calculated depreciation and impairment which would have been recognised if the non-current asset had not been classified as held for sale; and
- Recoverable values as of the date of the subsequent decision not to sell the asset.

Gains and losses from disposal of non-current assets held for sale are recognised by deducting the carrying value of an asset and related costs of sales from the disposal proceeds (sales price).

### **3.13. Leases**

The determination of whether an arrangement is a lease, or contains lease elements, is based on the substance of the arrangement and requires an assessment of whether the fulfilment of the arrangement is dependent on the use of a specific asset or group of assets and whether the arrangement conveys a right to use the assets. There are two main types of lease:

#### **a) *Finance Lease - Bank as a Lessee***

Finance leases, which transfer to the Bank substantially all the risks and benefits incidental to ownership of the leased item, are capitalised at the inception of the lease at the fair value of the leased property or, if lower, at the present value of the minimum lease payments and included in property, plant and equipment with the corresponding liability to the lessor included in other liabilities.

Capitalised leased assets are depreciated over the shorter of the estimated useful life of the assets and the lease term, if there is no reasonable certainty that the Bank will obtain ownership by the end of the lease term. Lease payments are apportioned between the finance charges and reduction of the lease liability so as to achieve a constant rate of interest on the remaining balance of the liability. Finance charges are charged directly against income in interest expense.

As of 31 December 2018, the Bank had no assets under the finance lease.

#### **b) *Operating Lease - Bank as a Lessee***

IFRS 16 "Lease", effective on 1 January 2019, brings major changes for lessee who have materially significant leases.

The key news for lessee is that in most cases, the lease will result in an asset that is capitalized along with the recognition of an obligation to make appropriate lease payments, which will result in changes to key financial indicators and may affect borrowing costs (interest).

At the commencement date, the lessee recognizes the obligation for lease and the asset that represents right to use it during the lease term (asset with the right of use). The requirement is to separately recognize interest expense on lease liability and depreciation costs of the eligible asset. (Note 2.1 (b))

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

In case of operating leases ending in a period of 12 months or less from the date of first application of IFRS 16, there will be no change in accounting records, as well as in a low value lease. In such cases, the Bank will recognize lease cost on a straight-line basis, as permitted by the standard.

**3.14. Provisions and Contingencies**

Provisions are recognised when the Bank has a present obligation (legal or constructive) as a result of a past event, and it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation (Note 28).

In order to be maintained, the best possible estimates of provisions are considered, determined and, if necessary, adjusted at each balance sheet date. Provision is measured at present value of outflow necessary to settle the liabilities, using the discount rate which reflects the current market estimate of the time value of money.

When the outflow of the economic benefits is no longer probable in order to settle legal or constructive liabilities, provisions are derecognised in income. Provisions are taken into account in accordance with their type and they can be used only for the expenses they were recognised initially for. Provisions are not recognised for future operating losses.

Contingent liabilities are not recognised in the accompanying financial statements. They are disclosed in the notes to the financial statements, unless the possibility of an outflow of resources embodying economic benefits is remote (Note 38(b) and (c)).

Contingent assets are not recognised in the financial statements but disclosed when an inflow of economic benefits is probable.

**3.15. Subordinated Liabilities**

Borrowings on which interest is payable and subordinated liabilities are classified as other financial liabilities and are initially recognised at fair value less attributable costs. They are subsequently measured at amortised cost over the life of the obligation using the effective interest method.

**3.16. Equity**

Equity consists of share capital (ordinary share), reserves (arising from financial assets measured at fair value through other comprehensive income), accumulated losses and current year profit (Note 30).

**3.17. Employee Benefits**

**a) *Employee Taxes and Contributions for Social Security***

In accordance with the regulations prevailing in the Republic of Serbia, the Bank has an obligation to pay tax and contributions to various state social security funds. These obligations involve the payment of contributions on behalf of the employee, by the employer in an amount calculated by applying the specific, legally-prescribed rates.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

The Bank is also legally obligated to withhold contributions from gross salaries to employees, and on their behalf to transfer the withheld portions directly to the appropriate government funds. The Bank has no legal obligation to pay further benefits due to its employees by the Pension Fund of the Republic of Serbia upon their retirement.

These taxes and contributions payable on behalf of the employee and employer are charged to expenses in the period in which they arise.

**b) *Liabilities arising from Other Benefits - Retirement Benefits***

In accordance with the Labour Law, the Bank is obligated to pay retirement benefits in an amount equal to two gross monthly salaries in Republic of Serbia, based on the average salary in the Republic of Serbia, according to the latest published information of the state authority responsible for statistics. Expenses and liabilities for these plans are not provided by the funds.

Provisions for the benefits and related expenses are recognised in the amount of present value of expected future cash flows using the projected unit credit actuarial valuation method (Note 28). Past service costs are recognised in the income statement when incurred, while actuarial gains and losses are recognised in the statement of other comprehensive income (unless materially insignificant, when recognised in the income statement).

Long-term provisions for retirement benefits upon retirement after fulfilling the prescribed conditions in accordance with the Labour Law, stated as of 31 December 2019, are determined using the following assumptions:

- Discount rate	2.25%
- Annual salary growth	4.0%
- Employee turnover rate	3.0%
- Disability rate	0.1%
- Mortality tables (SORS) for the years	2010 – 2012.

**c) *Short-Term Compensated Absences***

Accumulating compensated absences may be carried forward and used in future periods if the current period's entitlement has not been fully used. The expected cost of accumulated compensated absences is recognised in the amount that is expected to be paid as a result of the unused entitlement that has accumulated as of the balance sheet date. In the instance of non-accumulating compensated absences, no liability or expense is recognised until the time of the absence.

The Bank does not have its own pension funds or share-based remuneration options, and therefore there are no identified liabilities with respect to these benefits as of 31 December 2019.

**3.18. Financial Guarantees**

In the ordinary course of business, the Bank gives financial guarantees, consisting of payment guarantees and performance bonds, letters of credit, acceptances and other warranties. Financial guarantees are contracts which obligate the issuer of a guarantee to perform the payment or compensate the loss to the holder of a guarantee, incurred if a certain creditor fails to settle its liabilities in due time as required under the terms of the contract.

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

Financial guarantees are initially recognised in the financial statements at fair value as of the date the guarantee is given. Subsequent to initial recognition, the Bank's liability under each guarantee is measured at the higher of the amortised premium and the best estimate of expenditure required to settle any financial obligations arising as a result of the guarantee.

Any increase in the liability relating to the financial guarantees is recognised in the income statement. The premium received is recognised in the income statement within net fees and commissions income on a straight-line basis over the life of the guarantee.

**3.19. Funds Managed on Behalf of Third Parties**

The funds that the Bank manages on behalf of and for the account of third parties for a fee are disclosed within off-balance sheet items. The Bank bears no risk in respect of repayment of these placements.

**3.20. Taxes and Contributions**

**(a) Income Taxes**

*Current Income Tax*

Current income tax is calculated and paid in accordance with the effective Corporate Income Tax Law of the Republic of Serbia ("RS Official Gazette", no. 25/2001, 80/2002, 43/2003, 84/2004, 18/2010, 101/2011, 119/2012, 47/2013, 108/2013, 68/2014, 142/2014, 91/2015, 112/2015, 113/2017, 95/2018 and 86/2019) and relevant by-laws.

Income tax is calculated at the rate of 15% (2018: 15%) on the tax base reported in the annual corporate income tax return, and can be reduced by any applicable tax credits.

The tax return is submitted to the Tax Authority 180 days after the date of expiry of the tax liability. During the year, the Bank pays income taxes in monthly instalments, estimated on the basis of the tax return for the prior year.

Pursuant to the Law on Amendments and Supplements to the Corporate Income Tax Law ("RS Official Gazette", no. 108/2013), starting from determining the income tax for 2014, the tax payers are no longer able to use the tax incentive in the form of a tax credit for investment in fixed assets. A taxpayer who had qualified for the right to a tax incentive - tax credit by 31 December 2013 and presented details in the tax return for 2013 is entitled to use that right until the expiry of the deadline prescribed by the Law (not more than ten years).

The tax regulations in the Republic of Serbia do not provide for the possibility that any tax losses of the current period are used to recover taxes paid within a specific previous period. Losses recognised in the tax return in the current accounting period may be transferred to the account of profit determined in the annual tax return from the future accounting periods, but not longer than five ensuing years.

*Deferred Income Tax*

Deferred income tax is recognised, using the liability method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the financial statements.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**3. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (Continued)**

**3.20. Taxes and Contributions (Continued)**

**(a) Income Taxes (Continued)**

*Current Tax (Continued)*

Deferred tax liabilities are recognised on all taxable temporary differences. Deferred tax assets are recognised for all deductible temporary differences, carry forward of unused tax credits and unused tax losses, to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forwards of unused tax credits and unused tax losses can be utilised.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the year when the asset is realised or the liability is settled, based on the official tax rates and regulations that have been enacted or substantively enacted as of the balance sheet date. The tax rate of 15% is used for calculation of deferred income tax (2018: 15%).

The carrying amount of deferred tax assets is reviewed at each balance sheet date and reduced to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred tax asset to be utilised. Unrecognised deferred tax assets are reassessed at each balance sheet date and are recognised to the extent that it has become probable that future taxable profit will allow the deferred tax asset to be recovered.

Current and deferred taxes are recognised as income or expense and are included in net profit/(loss) for the period. Deferred income taxes related to items that are recorded directly in equity are also recognised in equity.

**b) Taxes, Contributions and Other Duties Not Related to Operating Result**

Taxes, contributions and other duties that are not related to the Bank's operating result include employer contributions on salaries, and various other taxes and contributions paid pursuant to republic and municipal regulations. These taxes and contributions are included within other expenses (Note 14).

**3.21. Related Party Disclosures**

For the purpose of these financial statements related legal entities are those entities when one legal entity has a possibility to control another entity or has the right to govern the financial and business operations of the entity, as defined by IAS 24 "Related Party Disclosures".

Relations between the Bank and its related parties are regulated at contractual basis. Outstanding balances of receivables and liabilities at the reporting date, as well as transactions occurred during the reporting periods with related parties are disclosed separately in notes to the financial statements (Note 32).

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**4. CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS**

The preparation of the financial statements requires the Bank's management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent assets and liabilities at the date of the financial statements, as well as income and expenses for the reporting period.

These estimations and related assumptions are based on information available as of the date of preparation of the financial statements. Actual results could differ from those estimates. These estimates and underlying assumptions are reviewed on an ongoing basis, and changes in estimates are recognised in the income statement for the periods in which they become known.

The estimates and assumptions that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year are addressed below.

**a) *Impairment of Financial Assets***

Starting from 1 January 2018, the Bank assesses at each reporting date the quality of receivables (other than those measured at fair value through profit or loss) in order to estimate expected credit losses in accordance with IFRS 9 "Financial Instruments".

Unlike impairment assessment in accordance with IAS 39 "Financial Instruments: Recognition and Measurement" in effect until 31 December 2017, when impairment losses were recognized only if there was objective evidence of impairment as a result of one or more events that occurred subsequent to the initial recognition of the asset (loss event) and when the loss event affected the estimated future cash flows of a financial asset or group of financial assets that could be reliably estimated, in accordance with IFRS 9 on impairment of financial instruments an objective evidence of impairment is not required in order for the credit loss to be recognised. Expected credit losses are also recognised for unimpaired financial assets.

Expected credit losses are recalculated at each reporting date in order to reflect the change in the credit risk since the initial recognition of a financial instrument, which previously identifies the expected losses.

12-month ECLs are recognised for all exposures where there was no increase in credit risk from initial recognition of a financial asset (Level 1), while for exposures in which there was an increase in credit risk, the calculation of lifetime ECLs is performed (Level 2).

Level 3 includes financial assets where there is objective evidence of impairment at the reporting date, i.e., non-performing financial assets and lifetime ECLs are calculated for them.

When calculating ECLs, the Bank uses future information and macroeconomic factors, i.e., understandable and supportive information, including projections of future economic conditions in calculating ECLs, both on an individual and group basis. The provisioning levels for losses will increase as the projected economic conditions deteriorate, i.e. they will decrease as projected economic conditions become more favourable.

The methodology and assumptions used for estimating both the amount and timing of future cash flows are reviewed regularly to reduce any differences between loss estimates and actual loss experience.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**4. CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS (Continued)**

**b) *Determination of Fair Value of Financial Instruments***

The fair value of financial instruments traded in active markets as of the balance sheet date is based on their quoted market prices, without any deductions for transaction costs.

For all other financial instruments not listed in an active market, the fair value is determined using the appropriate valuation techniques. Valuation techniques include net present value techniques, comparison to similar instruments for which observable market prices exist and other relevant valuation models. When market inputs are not available, they are determined by estimates that include a certain degree of assumptions in the estimate of fair value (Note 35).

Valuation models reflect the current market conditions as of the measurement date and do not necessarily represent market conditions before or after the date of measurement. Consequently, all valuation techniques are revised periodically, in order to appropriately reflect the current market conditions.

**c) *Useful Lives of Intangible Assets, Property, Plant and Equipment***

Intangible assets and property, plant and equipment are amortised/depreciated over their estimated useful lives. The determination of the useful lives of intangible assets, property, plant and equipment is based on an estimate of the length of the period during which these assets will generate income. The Bank's management makes periodic reviews and adequate changes are made, if needed, by the Bank's management. Changes in estimates could lead to significant changes in the present value of the amounts recorded in the income statement in certain periods.

For example, if the Bank reduced the useful life of the above mentioned assets by 10%, this would result in additional amortisation/depreciation charge on an annual basis in the amount of RSD 7,286 thousand.

**d) *Impairment of Non-financial Assets***

At each reporting date, the Bank's management reviews the carrying amounts of the Bank's intangible assets and property, plant and equipment presented in the financial statements. If there is any indication that such assets have been impaired, the recoverable amount of the asset is estimated in order to determine the extent of the impairment loss. If the recoverable amount of an asset is estimated to be less than its carrying value, the carrying amount of the asset is reduced to its recoverable amount.

An impairment review requires management to make subjective judgments concerning the cash flows, growth rates and discount rates of the cash generating units under review.

**e) *Deferred Tax Assets***

Deferred tax assets are recognised for all unused tax losses and/or tax credits to the extent to which taxable profit will be available against which the unused tax losses /credits can be utilised.

Significant estimate of the management is necessary to determine the amount of deferred tax assets which can be recognised, based on the period in which it was created and the amount of future taxable profits and the tax policy planning strategy (Note 15(c)).

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

---

**4. CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS (Continued)**

**f) *Employee Retirement Benefits***

The costs of defined employee benefits payable upon the termination of employment, i.e. retirement in accordance with the legal requirements are determined based on the actuarial valuation. The actuarial valuation includes an assessment of the discount rate, future movements in salaries, mortality rates and employee fluctuation rates.

As these plans are long-term ones, significant uncertainties influence the outcome of the assessment. Actuarial assumptions are disclosed in Note 3.17(b) to the financial statements.

Were the discount rate used to differ by 1 percentage point (higher/lower) from management's estimates, the provision for retirement benefits would be by an estimated RSD 1,580 thousand lower or RSD 2,015 thousand higher than the provision stated in the Company's financial statements as of 31 December 2019.

**g) *Provisions for Litigation***

The Bank is subject to a certain number of claims incidental to the normal conduct of its business, relating to and including commercial, contractual and employment matters, which are handled and defended in the ordinary course of business. The Bank routinely assesses the likelihood of any adverse outcomes to these matters as well as ranges of probable or reasonable estimated losses.

Reasonable estimates involve judgement made by the Bank's management after considering information including notifications, settlements, estimates performed the by Legal Department, available facts, identification of other potentially responsible parties and their ability to contribute, and prior experience.

A provision is recognised when it is probable that an obligation exists for which a reliable estimate can be made of the obligation after careful analysis of the individual matter (Note 38(b)). The required provision may change in the future due to new developments and as additional information becomes available.

Matters that are either possible obligations or do not meet the recognition criteria for a provision are disclosed, unless the possibility of transferring economic benefits is remote.



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**5. INTEREST INCOME AND EXPENSE**

	2019	In RSD thousand 2018
<b>Interest income</b>		
Banks	15,944	21,118
National Bank of Serbia	19,859	19,865
Corporate customers	152,549	222,221
Retail customers	58,728	76,243
State institutions	55,993	48,576
<b>Total</b>	<b>303,073</b>	<b>388,023</b>
<b>Interest expense</b>		
Banks	(3,210)	(11,059)
Corporate customers	(41,247)	(41,729)
Retail customers	(68,578)	(58,154)
State institutions	(28)	(78)
Interest expense on leases in accordance with IFRS 16	(2,201)	-
<b>Total</b>	<b>(115,264)</b>	<b>(111,020)</b>
<b>Net interest income</b>	<b>187,809</b>	<b>277,003</b>

Interest income and expense by type of financial instruments are presented as follows:

	2019	In RSD thousand 2018
<b>Interest income</b>		
Loans and advancements to banks	15,944	21,118
Repo placements with the National Bank of Serbia	306	2,761
Obligatory reserve with the National Bank of Serbia	6,302	8,469
Other placements and deposits with the National Bank of Serbia	13,251	8,635
Loans to corporate customers	152,549	222,422
Loans to retail customers	58,728	76,243
Loans to state institutions	55,993	48,375
<b>Total</b>	<b>303,073</b>	<b>388,023</b>
<b>Interest expense</b>		
Subordinated loans	(14,209)	(14,776)
National Bank of Serbia	(354)	(2,018)
Other banks	(2,856)	(108)
Deposits from corporate customers	(27,038)	(35,886)
Deposits from retail customers	(68,578)	(58,154)
Deposits and borrowings from state institutions	(28)	(78)
Interest expense on leases in accordance with IFRS 16	(2,201)	-
<b>Total</b>	<b>(115,264)</b>	<b>(111,020)</b>
<b>Net interest income</b>	<b>187,809</b>	<b>277,003</b>

**STATEMENT OF CASH FLOWS**  
**For the Year Ended 31 December 2019**

**6. FEE AND COMMISSION INCOME AND EXPENSE**

	2019	In RSD thousand 2018
<b>Fee and commission income</b>		
Domestic payment traffic operations	45,279	38,616
Purchase and sale of foreign currencies	1,721	4,350
Credit activities	12,674	12,163
Other fees and commissions	58,042	26,450
<b>Total</b>	<b>117,716</b>	<b>81,579</b>
<b>Fee and commission expense</b>		
Domestic payment traffic operations	(22,780)	(16,346)
Foreign payment traffic operations	(21,261)	(15,653)
<b>Total</b>	<b>(44,041)</b>	<b>(31,999)</b>
<b>Net fee and commission income</b>	<b>73,675</b>	<b>49,580</b>

**7. NET (LOSSES)/GAINS FROM HEDGING**

	2019	In RSD thousand 2018
Gains from changes in value of derivatives intended for hedge accounting		-
Losses from changes in value of derivatives intended for hedge accounting	(447)	(1,104)
<b>Net (losses)/gains</b>	<b>(447)</b>	<b>(1,104)</b>

**8. NET FOREIGN EXCHANGE GAINS AND EFFECTS OF CONTRACTED FOREIGN CURRENCY CLAUSE**

	2019	In RSD thousand 2018
Foreign exchange gains and positive effects of contracted foreign currency clause application	1,056,014	1,299,133
Foreign exchange losses and negative effects of contracted foreign currency clause	(866,055)	(988,065)
<b>Net foreign exchange gains and effects of contracted foreign currency clause</b>	<b>189,959</b>	<b>311,068</b>

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**9. OTHER OPERATING INCOME**

	2019	In RSD thousand 2018
Rental income	2,097	1,434
Reimbursement of costs	-	12
Other income	-	20
<b>Total</b>	<b>2,097</b>	<b>1,466</b>

**10. NET IMPAIRMENT LOSS ON FINANCIAL ASSETS NOT MEASURED AT FAIR VALUE THROUGH PROFIT OR LOSS**

**a) (Charged)/Credited to the Income Statement**

	2019	In RSD thousand 2018
<b>Impairment losses and provisions</b>		
Impairment losses on financial assets:		
- loans and advances to banks	(24,196)	(16,375)
- loans and advance to customers	(363,438)	(445,833)
- other assets	(34,821)	(134)
Provisions for credit risk-weighted off-balance sheet items	(2,152)	(3,956)
<b>Total (Note 10(b))</b>	<b>(424,607)</b>	<b>(466,298)</b>
Impairment of securities measured at fair value through other comprehensive income	(1,389)	(3,150)
<b>Total expenses</b>	<b>(425,996)</b>	<b>(469,448)</b>
<b>Reversal of impairment losses</b>		
Reversal of impairment losses on financial assets:		
- loans and advances to banks	29,358	11,090
- loans and advance to customers	351,382	338,845
- other assets	17,950	729
	<b>398,690</b>	<b>350,664</b>
<b>Release of provisions for:</b>		
- credit risk-weighted off-balance sheet items	2,487	4,661
<b>Total income (Note 10(b))</b>	<b>401,177</b>	<b>355,325</b>
<b>Net impairment loss</b>	<b>(24,819)</b>	<b>(114,123)</b>

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2019

10. NET IMPAIRMENT LOSS ON FINANCIAL ASSETS NOT MEASURED AT FAIR VALUE THROUGH PROFIT OR LOSS (Continued)

b) Movements in the Allowance for Impairment of Financial Assets and Provision for Credit Risk-weighted Off-balance Sheet Items

	In RSD thousand				
	Loans and advances to banks (Note 19)	Loans and advances to customers (Note 20)	Other assets (Note 24)	Provision for credit risk- weighted off- balance sheet items (Note 28)	Total
Balance as of 1 January 2018	3,847	470,791	247	2,245	477,130
Charge for the year (Note 10(a))	16,375	445,833	134	3,956	466,298
Reversal of impairment losses and release of provision (Note 10(a))	(11,090)	(338,845)	(729)	(4,661)	(355,325)
Accounting write-off (Note 31(b))	-	(110,604)	-	-	(110,604)
Foreign exchange gains and losses and other movements	(62)	7,639	690	(4)	8,263
Balance as of 31 December 2018	9,070	474,814	342	1,536	485,762
Balance as of 1 January 2019	9,070	474,814	342	1,536	485,762
Charge for the year (Note 10(a))	24,196	363,438	34,821	2,152	424,607
Reversal of impairment losses and release of provision (Note 10(a))	(29,358)	(351,382)	(17,950)	(2,487)	(401,177)
Accounting write-off (Note 31(b))		(93,817)			(93,817)
Foreign exchange gains and losses and other movements	-	4,173		(2)	4,171
Balance as of 31 December 2019	3,908	397,226	17,213	1,199	419,546

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**11. SALARIES, COMPENSATIONS AND OTHER PERSONAL EXPENSES**

	2019	In RSD thousand 2018
Gross salaries and compensations	210,291	143,889
Payroll taxes and contributions	69,041	49,453
Provisions for unused vacations	9,548	8,892
Other personal expenses	44,969	7,504
Provision for retirement benefits (Note 28(d))	4,688	1,532
<b>Total</b>	<b>338,537</b>	<b>211,270</b>

**12. AMORTISATION AND DEPRECIATION EXPENSES**

	2019	In RSD thousand 2018
Amortisation and depreciation expenses:		
- amortisation of intangible assets (Note 21)	17,052	13,438
- depreciation of property, plant and equipment (Note 22(a))	6,793	9,541
- depreciation of investment property	262	262
- lease in accordance with IFRS 16	48,759	-
<b>Total</b>	<b>72,866</b>	<b>23,241</b>

**13. OTHER INCOME**

	2019	In RSD thousand 2018
Reversal of provisions for holiday allowances	8,032	5,995
Term deposits termination	647	398
Reimbursement of costs of the Bank's employees	171	2,148
Other income	2,130	2,676
<b>Total</b>	<b>10,980</b>	<b>11,217</b>

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018

14. OTHER EXPENSES

	2019	In RSD thousand 2018
Rental costs	763	48,393
Maintenance costs	54,150	58,177
Professional services	45,478	37,574
Advertising and representations costs	5,427	8,285
Postal and telecommunication costs	6,882	6,872
Insurance premiums	44,242	47,711
Taxes	12,630	5,375
Contributions	39,559	32,152
Other compensations to employees	8,164	6,020
Cost of material	8,979	8,522
Provisions for litigations (Note 28(d))	426	8,395
Other expenses	49,848	4,420
<b>Total</b>	<b>276,548</b>	<b>271,896</b>

15. INCOME TAX

a) Components of Income Taxes

	2019	In RSD thousand 2018
Current income tax	-	-
Deferred tax income	(850)	(1,658)
Deferred tax expense	217	
<b>Total tax income of the period</b>	<b>(633)</b>	<b>(1,658)</b>

b) Numerical Reconciliation of Income Tax Recognised in the Income Statement and Result for the Year Before Tax Multiplied by the Statutory Income Tax Rate

	2019	In RSD thousand 2018
<b>Profit/(loss) before income tax</b>	<b>(241,428)</b>	<b>28,700</b>
<b>Income tax at statutory rate of 15%</b>	<b>(36,214)</b>	<b>4,305</b>
Reconciliation of expenses/income	36,847	(5,963)
Unrecognized deferred tax assets on current year tax losses		-
<b>Total tax income reported in the income statement</b>	<b>(633)</b>	<b>(1,658)</b>

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**15. INCOME TAX (Continued)**

**c) Deferred Tax Assets**

Deferred tax assets as of 31 December 2019 relate to:

- the temporary difference arising from the provision for employee retirement benefits in the amount of RSD 1,392 thousand (31 December 2018: RSD 711 thousand), due to different periods of recognising the provision for accounting and tax purposes;
- the temporary difference between the carrying value of property, plant and equipment and intangible assets and their tax basis in the amount of RSD 1,816 thousand (31 December 2018: RSD 3,453 thousand); and
- other temporary differences in the amount of RSD 1,109 thousand (31 December 2018: RSD 1,326 thousand).

Movements in **deferred tax assets** during the year were as follows:

	<u>2019</u>	<u>In RSD thousand 2018</u>
<b>Balance as of 1 January</b>	<b>5,491</b>	<b>3,833</b>
Effects of temporary differences arising from employee benefits credited to the income statement	681	230
Effects of temporary differences arising from different amortization/depreciation rates credited to the income statement	(1,637)	184
Other temporary differences	<u>(217)</u>	<u>1,244</u>
<b>Balance as of 31 December</b>	<b><u>4,318</u></b>	<b><u>5,491</u></b>

**d) Deferred Tax Liabilities**

Deferred tax liabilities as of 31 December 2019 relate to temporary differences arising from income from changes in the value of debt securities at fair value through other comprehensive income (i.e., securities available for sale in the prior year).

Movements in **deferred tax liabilities** during the year are presented below:

	<u>2019</u>	<u>In RSD thousand 2018</u>
<b>Balance as of 1 January</b>	<b>1,434</b>	<b>1,746</b>
Effects of temporary differences arising from securities (credited)/debited to equity	<u>2,653</u>	<u>(312)</u>
<b>Balance as of 31 December</b>	<b><u>4,087</u></b>	<b><u>1,434</u></b>

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**15. INCOME TAX (Continued)**

**e) Tax Losses and Tax Credits**

The Bank has tax loss and tax credit carry forwards from previous years, which can be used in the following fiscal years as presented below.

	<u>In RSD thousand</u>
Tax loss carry forwards:	
- up to one year	-
- one to five years	35,040
Tax credit carry forwards:	
- over five years	6,791

As of 31 December 2019, the Bank did not recognise deferred tax assets related to the aforementioned tax loss carry forwards due to uncertainty of sufficient amounts of the future taxable income against which tax loss carry forwards can be used.

**16. EARNINGS PER SHARE**

Basic earnings per share is calculated by dividing the net profit/(loss) attributable to ordinary equity holders of the Bank by the weighted average number of ordinary shares outstanding during the period.

Pursuant to the Serbian Business Registers Agency Decision no. BD 119077/2008 dated 11 July 2008, the Bank is a joint-stock company whose shares are not publicly traded, and therefore, it is not obliged to calculate and disclose the earnings per share as required by IAS 33 "Earnings per Share".



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**17. CASH AND BALANCES WITH CENTRAL BANK**

	In RSD thousand	
	31 December 2019	31 December 2018
<b>In Dinars</b>		
Current and gyro accounts	633,078	877,392
Deposited liquid funds	-	-
Petty cash	40,787	58,133
Accrued income on cash and balances with central banks	184	260
	<b>674,049</b>	<b>935,785</b>
<b>In foreign currency</b>		
Obligatory reserve	787,872	827,362
Petty cash	160,982	206,028
	<b>948,854</b>	<b>1,033,390</b>
<b>Balance as of</b>	<b>1,622,903</b>	<b>1,969,175</b>

The obligatory reserve in local currency - Dinars (RSD) represents the minimal reserve in foreign currency allocated in line with the Decision on Banks' Required Reserves with the National Bank of Serbia ("RS Official Gazette", no. 3/2011, 31/2012, 57/2012, 78/2012, 87/2012, 107/2012, 62/2013, 125/2014, 135/2014, 4/2015, 78/2015, 102/2015, 76/2018 and 21/2019).

The Bank calculates the obligatory reserve against liabilities in respect of dinar deposits, credits and securities, as well as other dinar liabilities, excluding dinar deposits received under transactions performed on behalf of and for the account of third parties that are not in excess of the amount of the Bank's placements made from such deposits.

The Bank is required to calculate and allocate the obligatory reserves in RSD by applying 5% rate (2018: 5%) to the amount of the average daily balance of the dinar funds with the agreed maturity of up to two years, i.e. (0% rate on a portion of the dinar base with the agreed maturity of over two years, i.e., over 730 days) during the preceding calendar month to their gyro account with the National Bank of Serbia (foreign currency clause-indexed deposits in dinars are part of the foreign currency base of the obligatory reserve).

The calculated dinar obligatory reserve is the sum of calculated dinar obligatory reserve of 5% and 38% of the dinar equivalent of calculated obligatory reserve in foreign currency and the sum of 0% of the dinar obligatory reserve and 30% of the dinar equivalent of calculated reserve in foreign currency.

The Bank allocates the calculated dinar obligatory reserves to its gyro account in Dinars.

In 2019, the National Bank of Serbia paid interest at a rate of 1.25% per annum on the average balance of the calculated obligatory reserve in Dinars until August 2019, and from August - 0.75% (2018: 1.25%).

As of 31 December 2019, the calculated obligatory reserve in Dinars amounted to RSD 500,398 thousand (31 December 2018: RSD 542,179 thousand).

## NOTES TO THE FINANCIAL STATEMENTS

For the Year Ended 31 December 2018

**17. CASH AND BALANCES WITH CENTRAL BANK (Continued)**

Pursuant to the Decision on Banks' Required Reserves with the National Bank of Serbia, the Bank calculates and allocates the obligatory foreign currency reserve in accordance with the prescribed rates on the foreign currency base, which is the daily average of foreign currency liabilities and the daily average of foreign currency clause-indexed dinar liabilities in the prior calendar month.

The Bank calculates the obligatory foreign currency reserve against liabilities in respect of foreign currency deposits, credits and securities and against other foreign currency liabilities, as well as deposits, credits and other foreign currency funds received from abroad under transactions performed on behalf and for the account of third parties.

In accordance with the above mentioned Decision, the Bank calculates and allocates the obligatory foreign currency reserve against foreign currency accounts of the National Bank of Serbia at a rate of 20% (2018: 20%) on the amount of the average daily balance of foreign currency funds in the preceding calendar months for the funds with the agreed maturity of up to two years, i.e., 730 days, and 13% (2018: 13%) on the portion of the foreign currency base with the agreed maturity of over 2 years, i.e., 730 days.

The percentage of allocation of the obligatory foreign currency reserve amounts to 100% (2018:100%) to foreign currency clause-indexed liabilities arising from dinar deposits, loans, securities and other dinar liabilities. Out of the total calculated foreign currency reserve 62% is allocated in EUR, and the remaining portion of 38% in dinars, for funds with the agreed maturity of up to two years, i.e., up to 730 days, and 70% is allocated in EUR for foreign currency funds with the agreed maturity of over two years, i.e., over 730 days, while the remaining 30% is allocated in dinars to the gyro account.

The dinar equivalent of the calculated obligatory reserve in Euros is determined by applying the official median exchange rate of RSD applicable on the day of calculation of the obligatory reserve, i.e. on the 17th day of the month.

The Bank calculates the obligatory reserve on the 17th day of the month and that reserve is valid from 18th day of the current month until 17th day of the following month ("accounting period"). The Bank is obligated to maintain for the accounting period the average daily balance of dinar obligatory reserve in the amount of calculated dinar obligatory reserve.

As of 31 December 2019, the Bank's obligatory foreign currency reserve was in compliance with the aforementioned Decision of the National Bank of Serbia.

The National Bank of Serbia does not pay interest on the obligatory reserve in foreign currency.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**17. CASH AND BALANCES WITH CENTRAL BANK (Continued)**

Overview of the differences between cash stated in the Statement of Cash Flows and Balance Sheet as of **31 December 2019** and **31 December 2018** is presented in the table below:

	In RSD thousand	
	2019	
	Balance sheet	Cash flow statement
<b>In RSD</b>		
Current and gyro accounts	633,078	633,078
Petty cash	40,787	40,787
Prepayments and accrued income	184	184
	<u>674,049</u>	<u>674,049</u>
<b>In foreign currency</b>		
Petty cash	160,982	160,982
Obligatory reserve	787,872	787,872
	<u>948,854</u>	<u>948,854</u>
Less: Allowance for impairment of foreign currency accounts	-	-
<b>Balance as of 31 December</b>	<u><b>1,622,903</b></u>	<u><b>1,622,903</b></u>

	In RSD thousand		
	2018		
	Balance sheet	Cash flow statement	Difference
<b>In RSD</b>			
Current and gyro accounts	877,392	877,392	-
Petty cash	58,133	58,133	-
Prepayments and accrued income	260	-	260
	<u>935,785</u>	<u>935,525</u>	<u>260</u>
<b>In foreign currency</b>			
Petty cash	206,028	206,028	-
Foreign currency accounts (Note 19(a))	-	1,674,664	(1,674,664)
Obligatory reserve	827,362	-	827,362
	<u>1,033,390</u>	<u>1,880,692</u>	<u>(847,302)</u>
Less: Allowance for impairment of foreign currency accounts	-	(5,488)	5,488
<b>Balance as of 31 December</b>	<u><b>1,969,175</b></u>	<u><b>2,810,729</b></u>	<u><b>(841,554)</b></u>

Movements in liabilities arising from financing activities - loans received in the Cash Flow Statement

	In RSD thousand	
	2019	2018
<b>Balance as of 1 January</b>	<b>116,556</b>	<b>159,023</b>
Settlement of liabilities arising from loans received	(796)	(24,012)
Foreign exchange gains/losses, net	16,208	(18,455)
<b>Balance as of 31 December</b>	<u><b>131,968</b></u>	<u><b>116,556</b></u>

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018

**18. SECURITIES**

	In RSD thousand	
	31 December 2019	31 December 2018
Government bonds:		
– in RSD	642,016	904,119
– in foreign currency	1,190,368	952,413
<b>Balance as of</b>	<b>1,832,384</b>	<b>1,856,532</b>

Securities in the amount of RSD 642,016 thousand relate to bonds denominated in Dinars, whose maturity dates are 04 May 2020, with the interest rate of 4.90% per annum, and 17 January 2022, with the interest rate of 3.73% per annum.

The nominal amount was reduced by RSD 208,075 thousand for financial assets in securities issuing for securing the liabilities that bank gave as a pledge to NBS for loan.

Securities in the amount of RSD 1,190,368 thousand relate to bonds denominated in EUR, whose maturity dates are 25 January 2022 with the interest rate of 1.23% per annum, and 18 April 2023 with the interest rate of 1.78% per annum.

**PLEDGED SECURITIES**

	In RSD thousand	
	31 December 2019	31 December 2018
Government bonds:		
– in RSD	208,075	-
– in foreign currency	-	-
<b>Balance as of</b>	<b>208,075</b>	<b>-</b>

On 18 December 2019, the Bank pledged securities in RSD with NBS for short-term liquidity loan that amounted as of 31 December 2019, RSD 208,075 thousand. Pledge on RSD securities refers to the period from 18 December 2019 to 31 January 2020. During the period, the Bank did not withdraw any liquidity loan from NBS on the basis of pledged RSD securities.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**19. LOANS AND ADVANCES TO BANKS AND OTHER FINANCIAL ORGANIZATIONS**

**a) Summary per Type of Loans**

	<b>In RSD thousand</b>	
	<b>31 December 2019</b>	<b>31 December 2018</b>
<b>In RSD</b>		
Receivables from the National Bank of Serbia arising from repurchase (repo) transactions	-	-
Other placements	125	111
	<u>125</u>	<u>111</u>
<b>In foreign currency</b>		
Current accounts	1,072,187	1,674,664
Other deposits	16,142	330,662
	<u>1,088,329</u>	<u>2,005,326</u>
<b>Gross loans and advances</b>	<b>1,088,454</b>	<b>2,005,437</b>
Less: Allowance for impairment (Note 10(b))	(3,908)	(9,070)
<b>Balance as of</b>	<b><u>1,084,546</u></b>	<b><u>1,996,367</u></b>

As of 31 December 2019, the Bank did not have funds invested into treasury bills of the National Bank of Serbia.

Outstanding balance on the current accounts in foreign currency mostly relates to funds on the foreign currency account held with the National bank of Serbia in amount of RSD 748,972 thousand (31 December 2018: RSD 1,475,065 thousand).

Other deposits in foreign currency in the amount of RSD 16,142 thousand as of 31 December 2019 mainly relate to the guarantee deposit of EUR 40,000 with the Central Securities Depository and Clearing House, and a short-term deposit with Banka Poštanska štedionica in the amount of EUR 50,000 thousand.

## NOTES TO THE FINANCIAL STATEMENTS

For the Year Ended 31 December 2018

b) **Maturity Structure of Loans and Receivables**

The maturity structure of gross loans and advances to banks and other financial organizations, based on the remaining maturity period, outstanding as of 31 December 2019 and 2018, is as follows:

	In RSD thousand	
	31 December 2019	31 December 2018
Up to 30 days	1,083,750	1,965,252
Over a year	4,704	40,185
<b>Total</b>	<b>1,088,454</b>	<b>2,005,437</b>

20. **LOANS AND ADVANCES TO CUSTOMERS**a) **Summary per Type of Customers**

	In RSD thousand	
	31 December 2019	31 December 2018
<b>Short-term loans in Dinars:</b>		
- Corporate customers	900,833	1,089,283
- Retail customers	32,802	24,130
	<b>933,635</b>	<b>1,113,413</b>
<b>Long-term loans in Dinars:</b>		
- Corporate customers	2,931,516	2,493,459
- Retail customers	426,585	750,858
	<b>3,358,101</b>	<b>3,244,317</b>
<b>Long-term loans in foreign currency:</b>		
- Corporate customers	54,681	-
<b>Receivables for accrued interest:</b>		
- Corporate customers	50,578	39,991
- Retail customers	4,296	2,016
	<b>54,874</b>	<b>42,007</b>
<b>Deferred receivables for accrued interest:</b>		
- Corporate customers	285	125
- Retail customers	637	1,227
	<b>922</b>	<b>1,352</b>
<b>Deductible items in RSD - accruals and deferrals:</b>		
- Corporate customers	(9,707)	(9,204)
- Retail customers	(2,269)	(4,880)
	<b>(11,976)</b>	<b>(14,084)</b>
<b>Gross loans and advances</b>	<b>4,390,237</b>	<b>4,387,005</b>
<b>Less: Allowance for impairment (Note 10(b))</b>	<b>(397,226)</b>	<b>(474,814)</b>
<b>Balance as of</b>	<b>3,993,011</b>	<b>3,912,191</b>

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

As of 31 December 2019, gross loans in Dinars include loans with the contracted foreign currency clause in the amount of RSD 3,563,840 thousand (31 December 2018: RSD 3,214,876 thousand).

The loans are secured by the first-class collaterals that amount to RSD 60,905 thousand as of 31 December 2019 (31 December 2018: RSD 56,080 thousand).

Short-term loans have been granted to corporate customers for financing business activities in trading, processing industry and for other purposes, at the rates ranging from 3.0% to 6.98% per annum for loans with foreign currency clause, i.e. at rates ranging from 8.4% to 12% per annum for loans in Dinars.

The Interest rate on short-term retail loans in Dinars ranged from 5.9% to 11% per annum.

The interest rate on long-term retail loans ranged from 6.9% to 18.5% per annum (for cash and refinancing loans in Dinars).

**b) Structure of Loan Portfolio by Loan Type**

The structure of the gross loan portfolio by loan type, as of 31 December 2019 and 2018 is as follows:

	31 December 2019	In RSD thousand 31 December 2018
Overdraft on current accounts	17,095	26,261
Cash loans	452,971	760,651
Loans for working capital	1,689,030	1,260,985
Investment loans	38,395	58,871
Other loans	2,192,746	2,280,237
<b>Total</b>	<b>4,390,237</b>	<b>4,387,005</b>

Other loans as of 31 December 2019 in the gross amount of RSD 2,192,746 thousand (31 December 2018: RSD 2,280,237 thousand) mostly relate to loans granted to corporate customers for funding their business activities.

**c) Maturity Structure of Loan Portfolio**

The maturity structure of the gross loan portfolio, based on the remaining maturity period, outstanding as of 31 December 2019 and 2018 is as follows:

	31 December 2019	In RSD thousand 31 December 2018
Up to 30 days	626,972	626,879
From 1 to 3 months	55,280	155,159
From 3 to 12 months	497,850	730,662
Over 1 year	3,210,135	2,874,305
<b>Total</b>	<b>4,390,237</b>	<b>4,387,005</b>

NOTES TO THE FINANCIAL STATEMENTS  
 For the Year Ended 31 December 2018  
**20. LOANS AND ADVANCES TO CUSTOMERS (Continued)**

**d) Industry Concentration of Loan Portfolio**

As of 31 December 2019 and 2018 the gross loan portfolio is concentrated on the following

	31 December 2019	In RSD thousand 31 December 2018
Processing industry and manufacturing	2,718,973	2,267,553
Trade	802,409	979,241
Transportation and warehousing	87,059	131,160
Retail customers	462,051	773,351
Entrepreneurs	-	4
Other	319,745	235,696
<b>Total</b>	<b>4,390,237</b>	<b>4,387,005</b>



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**21. INTANGIBLE ASSETS**

	In RSD thousand	
	Licenses and software	Total
<b>COST</b>		
Balance as of 1 January 2018	195,776	195,776
Additions during the year	25,328	25,328
Balance as of 31 December 2018	221,104	221,104
Additions during the year	13,749	13,749
Balance as of 31 December 2019	234,853	234,853
<b>ACCUMULATED AMORTISATION</b>		
Balance as of 1 January 2018	156,876	156,876
Amortisation charge (Note 12)	13,438	13,438
Balance as of 31 December 2018	170,314	170,314
Amortisation charge (Note 12)	16,801	16,801
Balance as of 31 December 2019	187,115	187,115
<b>CARRYING VALUE AS OF:</b>		
- as of 31 December 2019	47,738	47,738
- as of 31 December 2018	50,790	50,790

The carrying value of intangible assets as of 31 December 2019 relates to software in the amount of RSD 41,080 thousand (31 December 2018: RSD 49,251 thousand) and licenses in the amount of RSD 6,658 thousand (31 December 2018: RSD 1,539 thousand).

Based on the Bank's management estimate, intangible assets at 31 December 2018 are not impaired.

## NOTES TO THE FINANCIAL STATEMENTS

For the Year Ended 31 December 2018

**22. PROPERTY, PLANT AND EQUIPMENT AND INVESTMENT PROPERTY****a) Property, Plant and Equipment**

	Equip- ment	PPE under constru- ction	Leased assets	In RSD thousand Investment in third parties assets	Total
<b>COST</b>					
As of 1 January 2018	112,038	-	-	33,774	33,774
Additions during the year	7,012	73	-	-	7,085
Disposals	(2,362)	-	-	-	(2,362)
<b>Balance as of 31 December 2018</b>	<b>116,688</b>	<b>73</b>	<b>-</b>	<b>33,774</b>	<b>150,535</b>
Additions during the year	10,333	2,987	156,159	2,718	172,197
Disposals	(3,741)	(3,060)	-	-	(6,801)
<b>Balance as of 31 December 2019</b>	<b>123,280</b>	<b>-</b>	<b>156,159</b>	<b>36,492</b>	<b>315,931</b>
<b>ACCUMULATED AMORTISATION</b>					
As of 1 January 2018	83,018	-	-	33,774	116,792
Depreciation charge (Note 12)	9,541	-	-	-	9,541
Disposals	(2,362)	-	-	-	(2,362)
<b>Balance as of 31 December 2018</b>	<b>90,197</b>	<b>-</b>	<b>-</b>	<b>33,774</b>	<b>123,971</b>
Depreciation charge (Note 12)	6,793		48,759	250	55,802
Disposals	(3,300)				(3,300)
<b>Balance as of 31 December 2019</b>	<b>93,690</b>		<b>48,759</b>	<b>34,024</b>	<b>176,473</b>
<b>CARRYING VALUE AS OF:</b>					
- as of 31 December 2019	<b>29,590</b>		<b>107,400</b>	<b>2,468</b>	<b>139,458</b>
- as of 31 December 2018	<b>26,491</b>	<b>73</b>	<b>-</b>	<b>-</b>	<b>26,564</b>

The carrying value of equipment as of 31 December 2019 mostly relates to computer and telecommunication equipment and office furniture.

The most significant increase in property, plant and equipment relates to recognition of effects under IFRS 16- Lease.

Based on the Bank's management estimate, property, plant and equipment at 31 December 2019 are not impaired.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**b) Investment Property**

Pursuant to the Executive Board's Decision no. 228/2017 dated 26 October 2017, the Bank classified property acquired during the enforcement procedure against the enforcement debtor "Nafta" a.d. Belgrade in the amount of RSD 20,135 thousand as an investment property.

Pursuant to the Lease Agreement for Business Premises no. 57 concluded on 6 February 2018 and Annex no. 2 signed on 1 October 2018, the Bank rented the mentioned property to the company "RK Mountain" d.o.o. Zlatibor.

The carrying value of investment property as of 31 December 2019 amounted to RSD 19,610 thousand.

**23. NON-CURRENT ASSETS HELD FOR SALE AND DISCONTINUED OPERATIONS**

	31 December 2019	In RSD thousand 31 December 2018
Non-current assets held for sale	376,516	375,484
<b>Balance as of</b>	<b>376,516</b>	<b>375,484</b>

Assets acquired pursuant to the Agreement on the Sale and Purchase of Immovable and Movable Assets concluded with the legal entity FSH "Komponenta" d.o.o. Cuprija - in bankruptcy arising from the granted loan due for payment, the Bank classified in accordance with the Decision of the Executive Board dated 12 April 2016 as non-current assets held for sale. The Bank has advertised the above mentioned assets for sale and expects its sale in the near future.

As of 31 January 2018, Bank purchased movable and immovable property in the amount of RSD 1,032 thousand pursuant to the Agreement on the Sale and Purchase of Immovable and Movable Assets concluded with the legal entity FSH "Komponenta" d.o.o. Cuprija - in bankruptcy, and in connection with aforementioned transaction. In 2019, the Bank was registered as the owner of the property and thus increased value of fixed assets for sale.

Appraisal of property was done as of 31 December 2018 and the appraised value was EUR 3,170,000.00.

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018

24. OTHER ASSETS

	31 December 2019	In RSD thousand 31 December 2018
<b>Other receivables</b>		
Receivables from employees	142	-
Paid advances	54,701	8,200
Receivables for overpaid taxes	115	115
Other receivables	66,360	30,368
	<u>121,318</u>	<u>38,683</u>
<b>Prepayments and accrued income</b>		
Prepaid expenses in RSD	8,613	5,371
	<u>8,613</u>	<u>5,371</u>
<b>Gross other assets</b>	<b>129,931</b>	<b>44,054</b>
Less: Allowance for impairment (Note 10(b))	(17,213)	(342)
<b>Balance as of</b>	<b><u>112,718</u></b>	<b><u>43,712</u></b>

25. DEPOSITS AND OTHER FINANCIAL LIABILITIES TO BANKS, OTHER FINANCIAL ORGANISATIONS AND CENTRAL BANK

	31 December 2019	In RSD thousand 31 December 2018
<b>In Dinars</b>		
Transaction accounts	5,929	9,378
Other deposits	200,000	-
Accrued interest liability	6	-
	<u>205,935</u>	<u>9,378</u>
<b>In foreign currency</b>		
Transaction accounts	39,883	1,095
Other deposits	-	5,201
Interest payable on loans, deposits and other, financial liabilities	-	-
Accrued interest liability	-	-
	<u>39,883</u>	<u>6,296</u>
<b>Balance as of</b>	<b><u>245,818</u></b>	<b><u>15,674</u></b>

Transaction deposits of banks and other financial institutions in Dinars as of 31 December 2019 mainly relate to the balance on the RSD transaction accounts of quite a number of insurance and finance companies, such as "Digital finance international" d.o.o. Belgrade, "Sogaz" a.d. Novi Sad, etc. The Bank does not pay interest on the balances on these accounts.

Other deposits of banks and other financial institutions in foreign currencies as of 31 December 2019 relate to overnight credit granted by Srpska banka a.d. Belgrade totalling RSD 200,000 thousand. The Bank pays 1% annual interest on these funds.

26. DEPOSITS AND OTHER FINANCIAL LIABILITIES TO CUSTOMERS

In RSD thousand

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

	31 December 2019	31 December 2018
<b>In Dinars</b>		
Transaction accounts	572,579	781,383
Savings deposits	100,252	98,009
Special-purpose deposits	2,265	17,587
Other deposits	49,212	584,028
Interest payable on loans, deposits and other financial liabilities	22	165
Accrued interest liability	1,561	2,740
	<u>725,891</u>	<u>1,483,912</u>
<b>In foreign currency</b>		
Transaction accounts	1,817,990	1,876,074
Savings deposits	4,186,033	4,351,387
Special-purpose deposits	68,593	83,479
Other deposits	586,789	583,771
Borrowings	-	796
Other financial borrowings	48,619	22,287
Interest payable on loans, deposits and other financial liabilities	2,964	1,185
Accrued interest liability	11,934	11,282
	<u>6,722,922</u>	<u>6,930,261</u>
<b>Balance as of</b>	<u><u>7,448,813</u></u>	<u><u>8,414,173</u></u>

On fixed-term deposits in Dinars and foreign currency of customers, the Bank pays interest at rates ranging from 1.00% to 3.00% per annum, depending on the currency and the period the funds have been deposited for.

A *vista* saving deposits in RSD do not earn interest, as well as *vista* saving deposits in USD and *vista* saving deposits in EUR.

The interest rates on the short-term retail customers' deposits in Dinars range from 2.90% per annum, depending on the period the funds have been deposited for.

The interest rates on the short-term retail customers' deposits in foreign currency range from 0.8% to 1.3% per annum, depending on the currency and the period the funds have been deposited for.

Long-term deposits placed by retail customers in foreign currency earn interest at rates ranging from 0.8% to 1.7% per annum for deposits in EUR, depending on the period that the funds have been deposited for.

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**27. SUBORDINATED LIABILITIES**

	31 December 2019	In RSD thousand 31 December 2018
Subordinated liabilities in a foreign currency	131,968	115,760
<b>Balance as of</b>	<b>131,968</b>	<b>115,760</b>

The outstanding balance of subordinated liabilities of RSD 131,968 thousand as of 31 December 2019 relates to the subordinated loan in the amount of RUB 78,000,000. The loan was initially obtained from the previous parent bank VTB Bank OAD, Saint Petersburg. The principal of the loan is to be repaid in full upon expiry of 7 years from the drawdown date. The contracted interest rate on this loan is 11.15% per annum (i.e. 12.38% per annum including withholding tax). The loan funds were withdrawn completely on 28 December 2017.

Pursuant to Annex no. 1 as of 26 June 2018 to the Subordinated Loan Agreement concluded on 27 December 2016, signed between VTB Bank OAD, Saint Petersburg and VTB Bank a.d. Belgrade, VTB Bank OAD, Saint Petersburg is entitled to assign or otherwise transfer its rights under the Agreement in accordance with the terms and conditions and the manner stipulated by the relevant regulations of the Republic of Serbia.

Pursuant to the Agreement on the Assignment of Receivables concluded on 2 July 2018, VTB Bank OAD, Saint Petersburg assigned all its rights under the subordinated loan agreement to a new shareholder "AZRS INVEST" d.o.o. Belgrade, which became the sole owner of the Bank with a changed name - API Bank a.d. Belgrade, in the process of sale of VTB Bank a.d. Belgrade.

**28. PROVISIONS**

	31 December 2019	In RSD thousand 31 December 2018
Provision for credit risk-weighted off-balance sheet items (a)	1,199	1,536
Provision for retirement benefits (b)	9,283	4,743
Provision for litigation (c)	6,899	8,347
<b>Balance as of</b>	<b>17,381</b>	<b>14,626</b>

- a) According to the Bank's internal policy, the provision for commitments and other credit risk-weighted off-balance sheet items (guarantees, acceptances, undrawn credit facilities etc.) is established when it is probable that an outflow of resources will be required to settle the obligation arising from the Bank's commitment, and when the objective evidence of such probability exists.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**28. PROVISIONS (Continued)**

- a) Evidence based on which the Bank performs the individual assessment of impairment are: payments effected on the Bank's accounts with respect to commitments arising from guarantees, bills of guarantees, etc., and that the customer has been classified in accordance with the Bank's classification criteria into the categories G and D. Individual assessment of impairment of off-balance sheet items is performed in the same manner as for the balance sheet assets.

Contingent liabilities for which the Bank does not expect any outflow of resources and/or it estimates that in the case of an outflow of resources all receivables will be fully collected are not provided for.

Furthermore, the Bank does not calculate the provision for risk-weighted off-balance sheet items (undrawn credit facilities) for all unfunded commitments subject to unconditional cancellation by the Bank due to deterioration in the borrower's financial position.

- b) The provision for retirement benefits has been recorded in the Bank's financial statements on the basis of an independent actuary's calculation as of 31 December 2019, and it is stated in the amount of the present value of the future defined benefit obligation.

When determining the present value of the expected outflows the following assumptions were used: the discount rate of 3.5%, average salary increase rate of 3% per annum, employee fluctuation rate of 3% and disability rate of 0.1% per annum.

- c) The Bank established a provision for litigations in which it acted as a defendant and for which adverse outcome was expected according to the estimate of the Legal Department (Note 38(b)).
- d) Movements in provisions during the year were as follows:

	In RSD thousand	
	2019	2018
<b>Provision for credit risk-weighted off-balance sheet items</b>		
Balance as of 1 January	1,536	13,888
Charge for the year (Note 10(b))	2,152	3,956
Release of provision (Note 10(b))	(2,487)	(4,661)
Exchange differences and other movements	(2)	(4)
	<b>1,199</b>	<b>1,536</b>
<b>Provision for retirement benefits</b>		
Balance as of 1 January	4,743	3,211
Rezervisanja u toku godine (Napomena 11)	4,688	1,532
Isplate u toku godine na teret rezervisanja	(148)	-
	<b>9,283</b>	<b>4,743</b>
<b>Rezervisanja za sudske sporove</b>		
Stanje na dan 1. januara	8,347	479
Charge for the year (Note 14)	426	8,395
Payments based on lost lawsuits	(1,874)	(527)
	<b>6,899</b>	<b>8,347</b>
<b>Balance as of 31 December</b>	<b>17,381</b>	<b>14,626</b>

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**29. OTHER LIABILITIES**

	31 December 2019	In RSD thousand 31 December 2018
Trade payables	14,832	12,703
Liabilities for value added tax	772	582
Liabilities for other taxes and contributions	76	74
Accrued interest expense	3,376	3,490
Deferred other income	3,211	3,265
Liabilities to employees	15,087	8,892
Liabilities arising from the lease in accordance with IFRS 16	109,585	-
Other liabilities	34,414	27,855
<b>Balance as of</b>	<b>181,353</b>	<b>56,861</b>

Other liabilities in the amount of RSD 34,414 thousand as of 31 December 2019 mostly relate to accrued liabilities in RSD (for loan repayment by physical and legal entities) in the amount of RSD 4,709 thousand and liabilities for factoring transactions amounting to RSD 26,789 thousand.

The most significant increase relates to an increase in liabilities in accordance with the first application of IFRS 16.

**30. EQUITY**

	31 December 2019	In RSD thousand 31 December 2018
Share capital - ordinary shares	3,672,407	3,672,407
Reserves	27,634	11,275
Prior years' accumulated loss	(2,046,031)	(2,076,389)
Profit/(loss) for the year	(240,795)	30,358
<b>Balance as of</b>	<b>1,413,215</b>	<b>1,637,651</b>

During 2018 the shareholders of the Bank changed. As disclosed in Note 1, the company registered in Serbia "AZRS INVEST" d.o.o. Belgrade became the Bank's owner and, accordingly, as of 31 December 2019, it is the sole shareholder participating with 100% in share capital of the Bank. The ultimate owner of "AZRS INVEST" d.o.o. Belgrade and the Bank respectively is a natural person - Andrey Zakharovich Shlyakhovoy.

As of 31 December 2019, subscribed and fully paid in share capital of the Bank consists of 7,344,813 ordinary shares (31 December 2018: 7,344,813 ordinary shares), with the nominal value per share of RSD 500.

Reserves in the amount of RSD 27,634 thousand as of 31 December 2019 include positive effects of the change in the value of securities measured at fair value through other comprehensive income (net of accompanying deferred taxes) in the amount of RSD 23,161 thousand and their accompanying allowance for impairment in the amount of RSD 5,042 thousand.

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2019

31. OFF-BALANCE SHEET ITEMS

	31 December 2019	In RSD thousand 31 December 2018
Guarantees and other irrevocable commitments (a)	2,150,960	793,289
Other off-balance sheet items (b)	9,648,899	10,153,879
<b>Balance as of</b>	<b>11,799,859</b>	<b>10,947,168</b>

a) Guarantees and other irrevocable commitments

	31 December 2019	In RSD thousand 31 December 2018
<b>Payment guarantees:</b>		
- in Dinars	470,852	413,900
- in foreign currency	-	77,027
	<b>470,852</b>	<b>490,927</b>
<b>Performance guarantees:</b>		
- in Dinars	531,116	301,528
- in foreign currency	420	834
	<b>531,536</b>	<b>302,362</b>
<b>Securities pledged as collateral to NBS:</b>		
- in Dinars	208,075	-
	<b>208,075</b>	<b>-</b>
<b>Total guarantees and other irrevocable commitments</b>	<b>1,210,463</b>	<b>793,289</b>
Swap transactions and purchase of foreign currency for dinars	940,497	-
<b>Balance as of</b>	<b>2,150,960</b>	<b>793,289</b>

The Bank establishes a provision for potential losses from other credit risk-weighted off-balance sheet items in accordance with the accounting policy disclosed in Note 28(a) to the financial statements. As of 31 December 2019, the provision against losses on guarantees and other irrevocable commitments recognised in the Bank's financial statements, amounts to RSD 1,199 thousand (31 December 2019: RSD 1,536 thousand).

As of 31 December 2019, the Bank did not have uncovered letters of credit and irrevocable commitments.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**31. OFF-BALANCE SHEET ITEMS (Continued)**

**b) Other Off-balance Sheet Items**

	31 December 2019	In RSD thousand 31 December 2018
Loro guarantees	3,970,778	3,860,494
Revocable commitments	293,674	618,732
Material collaterals, mortgages and pledges	3,260,545	3,664,033
Accounting write-off	1,436,859	1,343,042
Other off-balance sheet items	687,043	667,578
<b>Balance as of</b>	<b>9,648,899</b>	<b>10,153,879</b>

Revocable commitments amounting to RSD 293,674 thousand as of 31 December 2019 mostly relate to long-term credit lines in Dinars approved to corporate customers.

Revocable commitments arising from unused overdrafts on citizens' current accounts amount to RSD 1,890 thousand (31 December 2018: RSD 3,559 thousand), while permitted credit limits on citizens' credit cards amount to RSD 6,326 thousand (31 December 2018: RSD 7,191 thousand).

In 2019, within material collaterals, mortgages, the Bank presents all collaterals based on the loans granted (and not only first-ranking mortgages). In 2019, the Bank also derecognised material collaterals for all the clients for which accounting write-off was performed.

Pursuant to the National Bank of Serbia's Decision on Accounting Write-off of Bank Balance Sheet Assets issued on 10 August 2017 in effect since 30 September 2017, on 31 December 2019 the Bank transferred all the NPLs, in cases where the allowance for impairment equaled 100% of their gross book value, from balance sheet assets to off-balance sheet items in the amount of RSD 99,800 thousand (31 December 2018: RSD 110,604 thousand (Note 10(b))).

In 2019 the Bank recorded the remaining portion of immovable property based on the Factoring Agreement signed with Erste Bank a.d. Novi Sad within other off-balance sheet items.

**c) Credit Risk-weighted Off-balance Sheet Items**

The breakdown of credit risk-weighted off-balance sheet items of the Bank that are subject to the National Bank of Serbia classification as of 31 December 2019 and 2018 is presented in the table below:

	31 December 2019	In RSD thousand 31 December 2018
Guarantees and uncovered letters of credit	1,002,388	793,289
Commitments - irrevocable and revocable	293,674	618,732
<b>Balance as of</b>	<b>1,296,062</b>	<b>1,412,021</b>

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**32. RELATED PARTY DISCLOSURES**

A number of banking transactions are entered into with the shareholder and other related parties in the ordinary course of business which is presented in the following tables. These transactions were carried out at commercial terms and conditions and at the market rates.

Related parties of the Bank until 26 July 2018 were members of the Group to which the Bank belonged - VTB Group, and onwards from that date, the Bank's related party is "AZRS INVEST" d.o.o. Belgrade.

On 26 July 2018 the Central Securities Depository and Clearing House changed the ownership of the 100% of the shares of VTB Banka a.d. Belgrade and the sole owner of Bank's shares became company "AZRS INVEST" d.o.o. Belgrade, with registration number 20988592. The ownership change was made on the basis of the previously obtained approval from the National Bank of Serbia in accordance with the Decision G 2182 dated 22 March 2018. A new business name - API Bank a.d. Belgrade - was established according to amendments to the Articles of Association, Memorandum of Association and a Decision adopted by the General Assembly dated 24 September 2018.

Parties related with the Bank are persons who can have a significant impact on making financial and business decisions of the Bank. Parties related with the Bank are management of the Bank, the Board of Directors and the Executive Board members, their close relatives and legal entities in their ownership or under their control, as well as legal entities whose financial or business decisions are influenced by these persons.

- a) Outstanding balance of **receivables and payables** as of 31 December 2019 and 2018 resulting from transactions with shareholders and other Bank's related parties are presented in the following table:

	31 December 2019	In RSD thousand 31 December 2018
<b>Placements with banks:</b>		
Nostro accounts	-	-
Other placements	-	-
	<u>-</u>	<u>-</u>
<b>Loans:</b>		
Loans approved to the Bank's management	-	-
Less: Allowance for impairment	-	-
	<u>-</u>	<u>-</u>
<b>Total</b>	<u>-</u>	<u>-</u>
<b>Deposits and borrowings:</b>		
Transaction deposits of shareholders	12	3,371
Subordinated loans from shareholders	131,968	115,760
Deposits of individuals related to the Bank in the sense of the Law that governs banks' operations	19,031	20,305
<b>Total</b>	<u>151,011</u>	<u>139,436</u>

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**32. RELATED PARTY DISCLOSURES (Continued)**

- b) In 2019 the Bank generated **interest income** from related parties' transactions in the amount of RSD 47 thousand (2018: RSD 13,035 thousand).

**Interest expense** on deposits and borrowings from the shareholders and other related parties for the year ended 31 December 2019 amounted to RSD 14,209 thousand (2018: RSD 18,955 thousand).

- c) A summary of transactions with related parties from the VTB Group in 2019 and 2018 and the new shareholder "AZRS INVEST" d.o.o. Belgrade since 26 July 2018 is presented in the following table:

	In RSD thousand			
	Income	Expenses	Receivables	Liabilities
<b>2019</b>				
AZRS INVEST d.o.o. Belgrade	47	14,209	-	131,980
<b>Total</b>	<b>47</b>	<b>14,209</b>	<b>-</b>	<b>131,980</b>
	In RSD thousand			
	Income	Expenses	Receivables	Liabilities
<b>2018</b>				
VTB Bank OAD, Sankt Peterburg	12,683	11,720	-	-
VTB Bank Europe SE, Frankfurt*	352	1,393	-	-
AZRS INVEST d.o.o. Belgrade	-	5,842	-	119,131
<b>Total</b>	<b>13,035</b>	<b>18,955</b>	<b>-</b>	<b>119,131</b>

\* In December 2017, VTB Deutschland AG, Frankfurt changed its name into VTB Bank (Europe) SE, due to the decision of VTB Group concerning reorganisation of its activities in Europe. The change has been valid since 29 December 2017.

- d) **Salaries and other benefits** of the Executive Board members and other key management personnel of the Bank (stated in the gross amount) in 2019 and 2018 are presented in the following table:

	In RSD thousand	
	2019	2018
Members of the Executive Board	67,095	32,963
Members of the Board of Directors	38,413	5,681
Directors of Departments	53,072	34,285
Member of Audit Committee	1,790	-
<b>Total</b>	<b>160,370</b>	<b>72,929</b>

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**33. RISK MANAGEMENT**

Risk is inherent in banking activities, but it is managed through a process of ongoing identification, measurement and monitoring, establishing risk limits and applying other controls.

Owing to the nature of its activities, the Bank is exposed to the following major risks: credit risk, liquidity risk, interest rate risk and market risk (which includes the currency risk and other market risks).

The Bank is also subject to operational risks (including the legal risk, risks arising from the introduction of new products, activities, processes and systems, as well as the risk of entrusting activities to third parties, i.e. *outsourcing* and the information system risk), interest risk in the banking book, exposure risk to one entity or a group of related parties, risk of the Bank's investments in other legal entities and property, plant and equipment, as well as the impact of risk related to the country of origin of the entity to which the Bank is exposed and the risk of early repayment, which the Bank continuously monitors.

The Board of Directors and the Executive Board are ultimately responsible for the overall approach to risk management, as well as approval of the strategy and principles of risk management. In addition, the Bank has established separate independent bodies for managing and monitoring risks.

The Bank's bodies, authorized for risk management, constantly monitor changes in the legislation, while analysing their influence on the level of risks at the level of the Bank. They undertake necessary measures to bring the Bank's business activities and procedures in line with new procedures within the scope of controlled risk.

#### **Risk Management Sector**

In order to establish an integrated system of risk management and enable functional and organizational segregation of risk management activity and regular operating activities, the Bank has established the Risk Management Sector.

Liquidity risk management, as well as management of interest rate risk in the banking book, foreign exchange and other market risks, managing the risk of the Bank's exposure to a single entity or a group of related parties, management of investments in other legal entities and in fixed assets, management of the risk of exposure towards the country of a client's origin, operational risk and development of internal methodology for the evaluation, measurement and management of the risks that the Bank is exposed to, are included in the scope of activities of this Sector.

Credit risk management and providing recommendations for the Bank's exposures that are under the influence of credit risk, as well as monitoring and collection of the non-performing assets, i.e. bad assets within the department for operations with non-standard assets are also included in the scope of this Sector's activities.

#### **Treasury and Liquidity Sector and Assets and Liabilities Managing Committee**

The Treasury and Liquidity Sector is responsible for managing assets and liabilities and the overall financial structure of the Bank. Furthermore, it is responsible for the funding and liquidity of the Bank. The Assets and Liabilities Managing Committee is responsible for monitoring and managing liquidity risk.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**33. RISK MANAGEMENT (Continued)**

**Internal Audit**

Risk management processes throughout the Bank are audited at least annually by the internal audit function, which examines both the adequacy of the procedures and the Bank's compliance with the adopted procedures. Internal audit discusses the results of own assessments with the Bank's management and reports its findings and recommendations to the Audit Committee.

**Risk Management and Reporting Systems**

The Bank's risks are measured using a method which reflects both the expected loss likely to arise in normal circumstances and unexpected losses, which are an estimate of the ultimate actual loss based on statistical models. The models make use of probabilities derived from historical experience, adjusted to reflect the current economic environment. The Bank also runs worst case scenarios that would arise in the event of the extreme events, which are unlikely to occur.

Monitoring and control of the risks is primarily based on establishing limits. The limits reflect the business strategy and market environment of the Bank, as well as the level of risks the Bank is willing to accept. In addition, the Bank monitors and measures the overall risk bearing capacity in relation to the aggregate risk exposure across all risk types and activities.

Information collected from all operating activities is examined and processed in order to identify, analyse and control early risks. This information is presented and explained to the Board of Directors, Executive Board, Risk Management Sector and heads of all business units. The reports contain the total credit exposure, investment forecasts, departure from established limits, market risk measurement, liquidity ratios and changes in risk profiles.

The Bank's management assesses the adequacy of impairment of placements on quarterly basis. The Bank quarterly presents to the Audit Committee an extensive report that includes all the relevant information needed to estimate the risks the Bank is exposed to.

Special reports on risk management are prepared for each level in the Bank to ensure that all organizational units have access to comprehensive, necessary and updated information.

**33.1. Credit Risk**

Credit risk is the risk from occurrence of adverse effects to the financial performance and equity of the Bank due to inability of credit beneficiaries to fulfil contractual obligations to the Bank.

The Bank's credit risk is caused by the debtor's credit capacity, good credit history, as well as quality of collaterals, and is being identified, measured, estimated and monitored in accordance with the internal by-laws for credit risk management, as well as in accordance with decisions that regulate the classification of the balance sheet assets and off-balance sheet items, i.e. capital adequacy of the Bank.

In accordance with the Bank's Risk management policy, the procedures for managing credit risk and procedures for granting, effecting and collecting the placements, the process of credit risk management of individual placements and risks at the portfolio level, i.e., the procedures of identification, measurement and monitoring (control) of placements, especially those with increased risk levels, have been defined. In accordance

## NOTES TO THE FINANCIAL STATEMENTS

For the Year Ended 31 December 2018

with the aforementioned procedures, the Bank engages in activities with customers who have the appropriate creditworthiness and the risk levels estimated as acceptable, considering the ratio and connection of the categories of risk and profitability.

**33. RISK MANAGEMENT (Continued)****33.1. Credit Risk (continued)**

The Bank manages and controls credit risk by setting limits on the amount of risk it is willing to accept for individual counterparties and for geographical and industry concentrations, as well as by monitoring exposures in relation to these risks. Exposure to credit risk is continuously monitored by periodical assessments of the credit beneficiaries' abilities to settle their liabilities to the Bank and other creditors.

The Bank has established a credit quality review process to ensure early identification of possible changes in the creditworthiness of counterparties, including regular collateral review and revision.

Counterparty limits are established by the use of a credit risk classification system, which classifies every counterparty according to certain credit rank as well as according to the internal methodology, which defines the level of exposure that the Bank is willing to accept toward an individual customer or the group of related parties. The classification of counterparties is subject to regular reviews. The credit quality review process allows the Bank to assess the potential loss as a result of the risk to which it is exposed and take corrective actions.

According to the Bank's policy, making decisions on exposure to credit risk is centralized and concentrated in the Credit Committee for corporate and retail customers. Decisions of the Credit Committee are made upon consideration of proposals provided by competent sectors included in the process of granting loans and the Risk Management Sector.

The terms for approval of each corporate loan are determined individually depending on client type, loan's purpose, estimated creditworthiness, offered collateral and current market situation. Type of collateral that accompanies each loan is also determined according to the client creditworthiness analysis, type of credit risk exposure, term of the placement as well as the amount of a particular loan. All of the Bank's placements are based on relevant approvals, which determine the terms and other conditions for their implementation.

Reporting on credit risk is based on permanent monitoring at the level of the total portfolio of the Bank as well as at the individual client level. In accordance with the shareholder's request, credit risk is reported on monthly basis, when the overview of portfolio, defaults, movements in provisions and equity of the Bank is presented.

The Bank assesses impairment of financial assets as described in Note 2.1(a) IFRS 9 "Financial Instruments": Impairment - Financial Assets and Contract Assets.

***Credit-related Risks***

The Bank issues guarantees and letters of credit to its customers, and, consequently, it has a contingent liability to perform payments in favour of third parties. Thus, the Bank is exposed to credit-related risks, which can be mitigated by control processes and procedures used for mitigating credit risks.



NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2019

33. RISK MANAGEMENT (Continued)

33.1. Credit Risk (continued)

*Derivative Financial Instruments*

Credit risk arising from derivative financial instruments is, at any time, limited to the instruments with positive fair value, as recorded in the balance sheet. Such credit risk is limited by determining the maximum fair value of the total derivatives' portfolio, as well as determination of the maximum positive fair value of each individual transaction. The Bank is not exposed to this risk, since it does not have significant derivative financial instruments.

a) Maximum Exposure to Credit Risk by Balance Sheet Assets and Off-balance Sheet Items

The table below represents the maximum credit risk exposure as of 31 December 2019 and 2018, presented in the gross amount, without taking into account collaterals:

	In RSD thousand	
	31 December 2019	31 December 2018
	Gross maximum exposure	Gross maximum exposure
<b>The exposure related to balance sheet assets</b>		
Securities*	1,832,384	1,856,532
Loans and advances to banks and other financial institutions	1,084,546	530,372
Loans and advances to customers	3,993,011	4,387,005
Other assets	112,718	14,421
<b>Total balance sheet assets</b>	<b>7,022,659</b>	<b>6,788,330</b>
<b>The exposure related to off-balance sheet items</b>		
Payment guarantees	470,859	490,927
Performance bonds	531,536	302,362
Uncovered letters of credit	-	-
Irrevocable commitments	268,673	618,732
<b>Total off-balance sheet items</b>	<b>1,271,068</b>	<b>1,412,021</b>
<b>Total</b>	<b>8,293,727</b>	<b>8,200,351</b>

\* Securities as of 31 December 2019 completely relate to treasury bonds and from the Bank's point of view do not represent risky balance sheet items, and are, therefore, excluded from further analysis of the Bank's exposure to credit risk (i.e. risky placements - portfolios) presented in the tables below.

As presented in the table above, as of 31 December 2019, 48.14% of the maximum exposure to credit risk relates to loans and advances to customers (31 December 2018: 53.5%), 3.24% to irrevocable commitments (31 December 2018: 7.5%) and 13.08% to loans and advances to banks and other financial institutions (31 December 2018: 6.5%).

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**33. RISK MANAGEMENT (Continued)**

**33.1. Credit Risk (continued)**

**a) Maximum Exposure to Credit Risk by Balance Sheet Assets and Off-balance Sheet Items (Continued)**

The table below shows balance and off-balance sheet items classified under credit risk levels - 1, 2 and 3.

	In RSD thousand 31 December 2019		
	Gross exposure	Allowance for impairment and provisions	Net exposure
<b>Loans and advances to banks and other financial organisations</b>			
Regular placements	329,218	(3,907)	325,311
Level 1	323,338	(3,907)	319,432
<b>Loans and advances to customers and other assets</b>			
Regular placements	3,568,264	(79,101)	3,489,163
Level 1	3,529,218	(68,651)	3,460,567
Level 2	39,046	(10,450)	28,596
<b>Non-performing placements - Level 3</b>	713,295	(304,511)	408,784
Estimated at group level	15,419	(12,797)	2,622
Individually estimated	697,876	(291,714)	406,162
Securities - Level 1*	1,836,858	(4,474)	1,832,384
<b>Total balance sheet exposures</b>	<b>6,447,635</b>	<b>(383,044)</b>	<b>6,064,590</b>
<b>Off-balance sheet exposures</b>			
Regular placements	1,296,001	(3,732)	1,292,270
Level 1	1,080,385	(3,689)	1,076,696
Level 2	272	(42)	230
<b>Default placements - Level 3</b>	60	(60)	-
Estimated at group level	60	(60)	-
Individually estimated	-	-	-
<b>Total off-balance sheet exposures</b>	<b>1,296,062</b>	<b>(3,792)</b>	<b>1,292,270</b>

\* The allowance for impairment of debt securities in the amount of RSD 4,474 thousand as of 31 December 2019 is recorded under reserves based on the securities measured at fair value through other comprehensive income under equity, not as a deductible item from these financial assets.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**33. RISK MANAGEMENT (Continued)**

**33.1. Credit Risk (continued)**

**a) Maximum Exposure to Credit Risk by Balance Sheet Assets and Off-balance Sheet Items (Continued)**

Concentration of risk is managed by setting the limits by customer/counterparty, by geographical region and by industry sector. In order to avoid excessive risk concentration, the Bank's policies and procedures contain specific guidelines for the development and preservation of diversified portfolio. Accordingly, the Bank controls and manages identified concentrations of credit risks.

The analysis of the Bank's credit risk exposure by industry sectors with the balance as of 31 December 2019 and 2018 is presented in Note 20(d).

The structure of the Bank's credit risk exposure stated at the gross book value of the **total risky placements** as of 31 December 2019, grouped by geographical sectors, is presented in the table below:

	Serbia	Europe	Other	In RSD thousand Total
Loans and advances:				
- Banks and financial institutions	6,567	322,651	-	329,218
- Corporate customers	3,919,513	102,791	683	4,022,988
- Retail customers	481,827	3,381	4	485,212
- Entrepreneurs	89	-	-	89
Guarantees and other irrevocable commitments	1,296,062	-	-	1,296,062
<b>Balance as of 31 December 2019</b>	<b>5,704,058</b>	<b>428,823</b>	<b>687</b>	<b>6,133,568</b>
<b>Balance as of 31 December 2018</b>	<b>5,824,244</b>	<b>130,192</b>	<b>389,383</b>	<b>6,343,819</b>

The analysis of the Bank's credit risk exposure by industry sectors, before and after allowance for impairment of financial assets and provisions for risk, as of 31 December 2019 and 2018, is presented in the table below:

	Gross maximum exposure 2019	Net maximum exposure 2019	Gross maximum exposure 2018	Net maximum exposure 2018
Processing industry	2,744,664	2,615,681	2,455,117	2,295,412
Transportation and warehousing	112,116	110,481	162,402	160,263
Trade	1,338,736	1,314,218	1,443,393	1,315,802
Finance	329,594	325,687	551,647	542,578
Retail customers	493,428	430,787	785,435	745,747
Entrepreneurs	89	85	4	3
Other	1,114,941	917,086	945,821	798,252
<b>Total</b>	<b>6,133,568</b>	<b>5,714,025</b>	<b>6,343,819</b>	<b>5,858,057</b>

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**33. RISK MANAGEMENT (Continued)**

**33.1. Credit Risk (continued)****b) Portfolio Quality**

The Bank manages portfolio quality using the internal classification of placements.

The following tables present the quality of portfolio (gross placements and off-balance sheet exposure) as of 31 December 2019 and 2018, which is based on the Bank's grading system.

Category	Customer placements			Bank placements			In RSD thousand	
	Level 1	Level 2	Level 3	Level 1	Level 2	Level 3	Total 2019	Total 2018
							Placements to customers and banks	Placements to customers and banks
A	3,527,414	5,000	-	324,830	-	-	3,857,244	2,510,908
B	1,192,943	9,961	21,112	4,764	-	-	1,228,779	2,432,771
V	148,011	18,551	113,4942	-	-	-	166,676	522,154
G	45,840	7,144	268,240	-	-	-	321,224	312,855
D	3,027	20,918	535,700	-	-	-	559,645	565,131
<b>Total</b>	<b>4,917,235</b>	<b>61,574</b>	<b>825,165</b>	<b>329,594</b>	<b>-</b>	<b>-</b>	<b>6,133,568</b>	<b>6,343,819</b>

The structure of allowances for impairment and provisions, established in accordance with the Bank's internal methodology, was as follows as of 31 December 2019 and 2018:

Category	Allowances for impairment and provisions for customers			Allowances for impairment and provisions for banks			Total 2019	Total 2018
	Level 1	Level 2	Level 3	Level 1	Level 2	Level 3	Placement to customers and banks	Placement to customers and banks
A	30,076	-	0	3,812	-	-	33,887	17,254
B	32,766	1,407	485	95	-	-	34,752	46,715
V	6,982	6,048	33	-	-	-	13,063	22,067
G	65	2,952	54,978	-	-	-	57,995	70,340
D	74	14,292	265,482	-	-	-	279,847	329,386
<b>Total</b>	<b>69,963</b>	<b>24,699</b>	<b>320,978</b>	<b>3,907</b>	<b>-</b>	<b>-</b>	<b>419,547</b>	<b>485,762</b>

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**33. RISK MANAGEMENT (Continued)**

**33.1. Credit Risk (continued)**

**b) Portfolio Quality (Continued)**

An aging analysis of unimpaired loans and advances to customers and an overview of undue and unimpaired placements as of 31 December 2019 and 31 December 2018 were as follows:

	Placements to customers and banks			In RSD thousand	
	Level 1	Level 2	Level 3	Total 2019	Total 2018
Non-defaulted receivables	184,989	4,996	1	189,986	433,853
Defaulted receivables:					
- 1-30 days	20,533	-	-	20,533	12,005
- 31-60 days	-	547	-	547	1,941
- 61-90 days	-	571	-	571	4
- over 90 days	-	-	10,157	10,157	-
<b>Total</b>	<b>205,522</b>	<b>6,114</b>	<b>10,158</b>	<b>221,794</b>	<b>447,802</b>

The structure of the **risky balance sheet assets and off-balance sheet items and allowances for impairment/provision**, determined in accordance with the Bank's internal methodology, as of 31 December 2019 and 2018, is as follows.

As of 31 December 2019:

	Individual assessment		Group assessment		In RSD thousand Total 2019	
	Balance sheet assets	Allowance for impairment	Balance sheet assets	Allowance for impairment	Balance sheet assets	Allowance for impairment
Retail customers	65,327	(37,247)	419,885	(25,394)	485,213	(62,642)
Banks and other corporate customers	739,410	(280,673)	3,612,795	(76,226)	4,352,205	(356,899)
Entrepreneurs			89	(5)	89	(5)
	<b>804,737</b>	<b>(317,920)</b>	<b>4,032,769</b>	<b>(101,625)</b>	<b>4,837,506</b>	<b>(419,545)</b>
	Individual assessment		Group assessment		Total 2019	
	Off-balance sheet items	Provisions	Off-balance sheet items	Provisions	Off-balance sheet items	Provisions
Retail customers	-	-	8,216	(170)	8,216	(170)
Banks and other corporate customers	-	-	1,287,846	(3,643)	1,287,846	(3,643)
Entrepreneurs	-	-	-	-	-	-
	<b>-</b>	<b>-</b>	<b>1,296,062</b>	<b>(3,813)</b>	<b>1,296,062</b>	<b>(3,813)</b>
<b>Total</b>	<b>804,700</b>	<b>317,920</b>	<b>5,328,831</b>	<b>(105,438)</b>	<b>6,133,568</b>	<b>(423,358)</b>

**33. RISK MANAGEMENT (Continued)**

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018

33.1. Credit Risk (continued)

b) Portfolio Quality (Continued)

As of 31 December 2018:

	Individual assessment		Group assessment		In RSD thousand Total 2018	
	Balance sheet assets	Allowance for impairment	Balance sheet assets	Allowance for impairment	Balance sheet assets	Allowance for impairment
Retail customers	26,285	12,353	752,560	27,334	778,845	39,687
Banks and other corporate customers	762,529	381,855	3,390,420	62,683	4,152,949	444,538
Entrepreneurs	-	-	4	1	4	1
	<b>788,814</b>	<b>394,208</b>	<b>4,142,984</b>	<b>90,018</b>	<b>4,931,798</b>	<b>484,226</b>

	Individual assessment		Group assessment		Total 2018	
	Off-balance sheet items	Provisions	Off-balance sheet items	Provisions	Off-balance sheet items	Provisions
Retail customers	-	-	-	-	-	-
Banks and other corporate customers	-	-	1,412,021	1,536	1,412,021	1,536
Entrepreneurs	-	-	-	-	-	-
	<b>-</b>	<b>-</b>	<b>1,412,021</b>	<b>1,536</b>	<b>1,412,021</b>	<b>1,536</b>

<b>Total</b>	<b>788,814</b>	<b>394,208</b>	<b>5,555,005</b>	<b>91,554</b>	<b>6,343,819</b>	<b>485,762</b>
--------------	----------------	----------------	------------------	---------------	------------------	----------------

An allowance for impairment on a group and individual level is calculated according to the National Bank of Serbia Decision on Classification of Balance Sheet Assets and Off-balance Sheet Items, IFRS 9 "Financial Instruments" and the Bank's methodology for calculating allowance for impairment of financial assets on the basis of the internal procedure for calculating allowance for impairment.

The impairment assessment is performed on group and individual levels. The group assessment is performed for Level 1 and 2 placements, whereas the individual assessment is carried out when there is objective evidence of impairment of placements, i.e. for Level 3 placements.

The amount of the impairment loss is individually assessed as the difference between the carrying amount and the present value of estimated future cash flows, determined by discounting the expected cash inflow, using the latest effective interest rate, except for loans to private individuals for which the impairment is determined based on experience.

33. RISK MANAGEMENT (Continued)

33.1. Credit Risk (continued)

b) Portfolio Quality (Continued)

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

The major factors considered in the individual assessment of impairment of financial assets are default in servicing the debt principal or interests overdue for more than 90 days for material receivables, observed deterioration of the client's financial position, downgrade, breach of the original terms of the loan contract, amended terms of loan repayment or evidence of bankruptcy likelihood.

Impairment of materially less significant placements are assessed collectively for each segment separately (groups: corporate loans, corporate off-balance sheet items, retail loans, retail cards and overdraft, state and financial institutions), due to their similar characteristics in terms of credit risk based on statistical analysis of historical patterns of cash flows of that part of the portfolio. Elements of group calculation are: PD (probability of default - classification based on the creditworthiness adjusted for default in settlement of liabilities on the assessment date and for forward looking information), LGD, discount factor, collateral and calculation of exposure (EAD).

The amount of impairment of balance sheet assets is determined as the difference between the carrying amount and the present value of expected future cash flows regarding this claim. Impairment of loans, which reduces the value of placements, is recorded in the allowance account in the balance sheet, while the impairment of financial assets measured at fair value through other comprehensive income is recorded under reserves (equity) and recognised as an expense in the income statement.

***Rescheduled and Restructured Loans***

In order to protect against the risk of default in operations with debtors, the Bank takes the following measures to regulate receivables: rescheduling, restructuring, taking over properties in order to collect receivables, initiating court proceedings and other measures. The Bank grants rescheduling and restructuring to debtors with problems in operations in accordance with the conditions from the Decision on classification of balance sheet assets and off-balance sheet items.

As of 31 December 2019, the Bank had 10 restructured loans of corporate customers, as well as 47 restructured loans of retail customers.

As of 31 December 2018, the Bank had 4 rescheduled and 15 restructured loans of corporate customers, as well as 6 rescheduled and 65 restructured loans of retail customers.

31 December 2019	Rescheduled		In RSD thousand Restructured	
	Gross	Net	Gross	Net
Corporate customers	102,546	49,633	387,782	295,378
Retail customers	453	437	21,720	12,125
<b>Total</b>	<b>102,999</b>	<b>50,070</b>	<b>409,502</b>	<b>307,503</b>

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**33. RISK MANAGEMENT (Continued)**

**33.1. Credit Risk (continued)**

**b) Portfolio Quality (Continued)**

*Rescheduled and Restructured Loans (Continued)*

31 December 2018	Rescheduled		In RSD thousand Restructured	
	Gross	Net	Gross	Net
Corporate customers	166,860	53,780	658,877	545,448
Retail customers	884	857	25,843	15,729
<b>Total</b>	<b>167,744</b>	<b>54,637</b>	<b>684,720</b>	<b>561,177</b>

*Collaterals and Other Credit Enhancements*

The amount and type of the collateral required depends on an assessment of the credit risk of each customer. Terms of protection with respect to each placement are determined by the analysis of customers' creditworthiness, type of exposure to the credit risk, placements' maturity, as well as by the amount of the particular loan.

Using its internal methodology, the Bank determines the types of collaterals and the parameters of their valuation. Standard collaterals accepted by the Bank are as follows:

- For corporate loans - real estate mortgages, pledges over inventories and receivables, and
- For retail customers - promissory notes, joint and several guarantee, attachment of salary and authorization for account debit.

The Bank's management monitors the movements in the fair value of collaterals, demands additional collaterals in accordance with the relevant contracts, and monitors the fair value of collateral arrived at by considering the adequacy of the allowance for impairment.

The fair value of collaterals in the form of mortgages as of 31 December 2019 amounts to RSD 2,192,979 thousand (31 December 2018: RSD 2,722,619 thousand), in the form of pledges on inventory and receivables RSD 963,913 thousand (31 December 2018: RSD 1,097,004 thousand), while the fair value of other forms of collaterals amounted to RSD 103,659 thousand (31 December 2018: RSD 3,275 thousand).

During 2019 and 2018 the Bank did not approve housing loans to retail customers, and, consequently, does not have mortgages as collaterals arising with respect to these loans.

**c) Default Receivables**

The Bank pays special attention to default receivables by monitoring total outstanding balance and the trend of these loans and receivables. Corporate customers' loans get default status when they get NPL status. Retail customers' loans get default status in case of delay in payment of more than 90 days.



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**33. RISK MANAGEMENT (Continued)**

**33.1. Credit Risk (Continued)**

**c) Default Receivables (Continued)**

Default receivables are monitored at the Bank level, and in accordance with the product criteria (for retail customers) and the industrial sector the customers belongs to, as well as the maturity structure (for corporate clients and entrepreneurs).

	<b>Gross exposure</b>	<b>In RSD thousand Default receivables</b>
Corporate sector	4,314,304	667,992
Retail sector	447,949	45,480
Entrepreneurs' sector	89	-
Finance and insurance sector	329,594	-
<b>Total as of 31 December 2019</b>	<b>5,091,936</b>	<b>713,472</b>
<b>Total as of 31 December 2018</b>	<b>6,343,819</b>	<b>525,540</b>

**33.2 Liquidity Risk**

Liquidity risk is the risk of adverse effects on the Bank's financial result and equity due to its inability to fulfil its liabilities when due arising from:

- Withdrawal of the existing sources of financing, i.e., inability to obtain new sources of funding (liquidity risk of sources of funding) and/or
- Difficulties in converting assets into liquid assets due to disturbances in the market (market liquidity risk).

The main objective of liquidity risk management is to maintain the level of liquid assets in order to settle the outstanding liabilities arising with respect to the balance sheet and off-balance sheet activities at the Bank level in a proper and timely manner.

Liquidity risk management involves the management of all assets and liabilities of the Bank which may affect the Bank's inability to meet its outstanding liabilities.

In order to decrease or limit this risk, the Bank's management strives to arrange diversified funding sources in addition to its core deposit base, to manage balance sheet assets from the liquidity standpoint, and to monitor future cash flows and liquidity on a daily basis. This incorporates an assessment of expected cash flows, and the availability of high grade collaterals which could be used to secure additional funding, if required.

The Bank has established a unique process of liquidity risk management that identifies and assesses the impact of the Bank's activities on its exposure to liquidity risk, i.e., identifies and assesses their impact on the Bank's performance and equity.

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**33. RISK MANAGEMENT (Continued)**

**33.2 Liquidity Risk (Continued)**

The Bank's liquidity risk management involves an integrated process that includes:

1. Identifying the liquidity risk;
2. Measurement or liquidity risk assessment;
3. Mitigation of liquidity risk;
4. Monitoring and control of liquidity risk; and
5. Reporting on liquidity risk.

Identification of causes or early warning signals of liquidity crisis identification is implemented by the Treasury and Liquidity Sector, in cooperation with the Risk Management Sector and the Financing and Planning Sector, based on the information provided by the organizational units responsible for cooperation with corporate and retail clients, as well as by bodies responsible for liquidity risk management (the Board of Directors and/or Executive Board) and the members of the Assets and Liabilities Managing Committee (the "ALCO Committee").

Measurement or liquidity risk assessment is a quantitative and/or a qualitative assessment of the identified liquidity risk and it is the responsibility of the Risk Management Sector. Measurement and liquidity risk assessment involve the application of the GAP analysis, ratio analysis and stress testing.

Mitigation of liquidity risk implies determining measures and rules for mitigating risks by establishing a system of limits, i.e., maintaining the acceptable level of risk for the Bank's risk profile. The acceptable level of the Bank's risk exposure depends on: structure of assets and their ability to be converted into liquid assets, concentration of the funding sources, as well as the currency structure of assets and sources of funding, based on which limiting the adverse effects to the financial result and the capital of the Bank is enabled, i.e. the sufficient level of liquid funds to meet the outstanding liabilities and to finance the increase in assets is provided.

Mitigation of liquidity risk involves defining:

1. The limits of exposure to liquidity risk (basic and additional limits); and
2. Safeguards against liquidity risk.

Monitoring of liquidity risk defines the process of analysis of the status, changes and trends in liquidity risk exposure. The Risk Management Sector manages the liquidity risk by using defined internal limits within regulatory limits and prescribed measures for protection from critically low liquidity level, i.e. monitors compliance with the defined limits.

The Treasury and Liquidity Sector, in cooperation with other organizational units, carries out the measures for reducing/mitigating the liquidity risk and notifies the Risk Management Sector and ALCO Committee. The ALCO Committee decides whether and up to what extent the proposed measures will be carried out, i.e., whether the liquidity risk exposure is acceptable, considering the effects on the Bank's risk profile indicators - liquidity appetite.

The method of handling and resolving temporary and long-term liquidity crises is defined in more details by the Liquidity Crisis Plan and recovery options, further described through the Bank's Recovery Plan for 2019.

**33. RISK MANAGEMENT (Continued)**

**33.2 Liquidity Risk (Continued)**

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

For the purpose of managing the Bank's short-term liquidity the analyses of the maturity of inflows and outflows on the basis of different items of assets and liabilities are used. Managing medium-term and long-term liquidity is performed by projections of the balance sheet structure based on the planned operating activities and the Strategy of the Bank.

The ALCO Committee is responsible for liquidity risk management, establishing the control mechanisms for monitoring liquidity risk exposure, as well as for adopting relevant conclusions for minimizing risk exposure, adopting draft decisions for decision-making of the Bank's Executive Board - especially the matters regarding liquidity policy and raising funds, as well as other matters related to managing the Bank's assets and liabilities, which are significant for the financial stability of the Bank.

The Bank manages its assets and liabilities in such a way that it can fulfil its due obligations at all times, as well as to have customers disposing with their pecuniary assets in the Bank in accordance with the agreed deadlines.

Main liquidity parameters are monitored daily by the Treasury and Liquidity Sector in order to coordinate inflows and outflows of pecuniary assets, so that daily liquidity parameters remain within the limits prescribed by the National Bank of Serbia.

The coordination of maturity of placements with their sources is the basis for adequate management and provision of necessary liquidity level. The decision-making process on maturity of placements is based on the information on the maturity of deposits, especially on the one referring to the movement in the deposits of important clients, particularly their short-term needs. When deciding, the Bank is making sure that pecuniary assets from short-term sources of funding are not used for long-term placements.

The level of the Bank's liquidity is presented by the liquidity ratio, the narrow liquidity ratio and the liquidity coverage ratio (LCR).

The liquidity ratio is the ratio of the sum of the first and second degree of the Bank's liquid assets (cash, assets on accounts with other banks, deposits with the National Bank of Serbia, cheques and other monetary receivables in the process of realization, irrevocable credit lines approved to the Bank, quoted financial instruments and other receivables due within a month from the date of calculating liquidity ratios), on one hand, and the sum of the Bank's sight liabilities or liabilities without determined maturity and liabilities with fixed maturity up to one month from the date of calculation of the liquidity ratio, on the other hand.

The narrow liquidity ratio of the Bank is the ratio between the sum of the Bank's liquid first-degree receivables, on one hand, and the sum of the Bank's sight liabilities or liabilities without determined maturity and the Bank's liabilities with maturity within one month from the date of liquidity ratio calculation, on the other hand.

The liquidity coverage ratio (LCR) is the ratio between the protective layer of the Bank's liquidity and net outflows of liquid assets that would occur within the ensuing 30 days from the day of calculating this ratio under the assumed stress conditions, in aggregate in all the currencies and it is maintained at the level not lower than 100%.

### **33. RISK MANAGEMENT (Continued)**

#### **33.2 Liquidity Risk (Continued)**

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018

The liquidity ratios in 2019 and 2018 were as follows:

	2019	2018
Average during the period	6.20	3.65
Highest	9.33	6.34
Lowest	2.57	2.36
As of 31 December	4.31	6.34

As of 31 December 2019, the **narrow liquidity ratio** amounted to 3.99, while **LCR** amounted to 432.31% and it was above the prescribed limit.

During 2019 and 2018 the Bank maintained its liquidity level above the minimal prescribed limits established by the National Bank of Serbia.

Sources of financing are permanently monitored in order to maintain the diversification of sources of financing by currency, geographical origin, the source provider, products and maturity.

The table below presents Bank's financial liabilities based on *expected cash flows* established on the Bank's historical experience of deposit retention (share of transaction deposits retained is 70%, while the share of deposit renewals is - 80%). The table includes *the interest and the principal of the cash flows*.

	Up to 1 month	From 1 to 3 months	From 3 to 12 months	From 1 to 5 years	Over 5 years	Total
<b>31 December 2019</b>						
Deposits and other financial liabilities to banks, other financial organizations and central bank	45,913					45,913
Deposits and other financial liabilities to customers	3,369,746	633,313	1,966,051	1,780,526	-	7,749,636
Subordinated liabilities		3,658	7,357	179,609	-	190,624
Other liabilities	157,940	-	-	-	-	157,940
<b>Total</b>	<b>3,573,599</b>	<b>636,971</b>	<b>1,973,408</b>	<b>1,960,135</b>	<b>-</b>	<b>8,144,113</b>
<b>31 December 2018</b>						
Deposits and other financial liabilities to banks, other financial organizations and central bank	15,678	-	-	-	-	15,678
Deposits and other financial liabilities to customers	3,410,708	724,796	2,516,436	921,510	840,723	8,414,173
Subordinated liabilities		3,077	9,831	167,212	-	180,120
Other liabilities	56,861	-	-	-	-	56,861
<b>Total</b>	<b>3,483,247</b>	<b>727,873</b>	<b>2,526,267</b>	<b>1,088,722</b>	<b>840,723</b>	<b>8,666,832</b>

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**33. RISK MANAGEMENT (Continued)**

**33.2 Liquidity Risk (Continued)**

The Bank has short-term limits approved by domestic banks that operate in the banking sector of the Republic of Serbia in the amount of EUR 3,000,000.

The maturity structure of commitments for undrawn loans and limits, received guarantees and letters of credit based on the remaining contractual maturity dates as of 31 December 2019 and 2018 is presented in the table below:

	In RSD thousand		
	Up to 1 year	From 1 to 5 years	Total
<b>31 December 2019</b>			
Guarantees	738,636	263,752	1,002,388
Commitments for undrawn loans and limits	94,191	199,483	293,674
<b>Total</b>	<b>832,827</b>	<b>463,235</b>	<b>1,296,062</b>
<b>31 December 2018</b>			
Guarantees	495,723	297,566	793,289
Commitments for undrawn loans and limits	20,953	597,779	618,732
<b>Total</b>	<b>516,676</b>	<b>895,345</b>	<b>1,412,021</b>

The Bank does not expect that all of the irrevocable commitments will be withdrawn before they expire.

The table below provides an analysis of maturities of assets and liabilities based on the agreed terms of payment. The contractual maturities of assets and liabilities are determined based on the remaining period at the balance sheet date to the contractual maturity date.

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**33. RISK MANAGEMENT (Continued)**

**33.2 Liquidity Risk (Continued)**

The maturity structure of assets and liabilities at their carrying value at **31 December 2019**, by remaining maturity as of the balance sheet is presented as follows:

	In RSD thousand					
	Up to 1 month	From 1 to 3 months	From 3 to 12 months	From 1 to 5 years	Over 5 years	Total
<b>ASSETS</b>						
Cash and balances with central bank	1,622,903	-	-	-	-	1,622,903
Pledged financial assets	208,075	-	-	-	-	208,075
Securities	-	-	-	1,832,384	-	1,832,384
Loans and advances to banks and other financial organisations	1,078,666	-	5,880	-	-	1,084,546
Loans and advances to customers	398,120	54,945	492,525	2,798,662	248,759	3,993,011
Intangible assets	-	-	-	47,738	-	47,738
Property, plant and equipment	-	-	-	139,458	-	139,458
Investment property	-	-	-	19,610	-	19,610
Deferred tax assets	-	-	-	6,123	-	6,123
Non-current assets held for sale	-	-	376,516	-	-	376,516
Other assets	112,718	-	-	-	-	112,718
<b>Total assets</b>	<b>3,420,482</b>	<b>54,945</b>	<b>874,921</b>	<b>4,843,975</b>	<b>248,759</b>	<b>9,443,082</b>
<b>LIABILITIES</b>						
Deposits and other financial liabilities to banks, other financial organisations and central bank	245,818	-	-	-	-	245,818
Deposits and other financial liabilities to customers	3,168,690	630,914	1,931,835	1,717,374	-	7,448,813
Changes in the fair value of items that are hedged	447	-	-	-	-	447
Subordinated liabilities	-	-	-	131,968	-	131,968
Provisions	-	-	17,381	-	-	17,381
Deferred tax liabilities	4,087	-	-	-	-	4,087
Other liabilities	181,353	-	-	-	-	181,353
<b>Total liabilities</b>	<b>3,600,395</b>	<b>630,914</b>	<b>1,949,216</b>	<b>1,849,342</b>	<b>-</b>	<b>8,029,867</b>
<b>Equity</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,413,215</b>	<b>1,413,215</b>
<b>Total liabilities and equity</b>	<b>3,600,395</b>	<b>630,914</b>	<b>1,949,216</b>	<b>1,849,342</b>	<b>1,413,215</b>	<b>9,443,082</b>
<b>Maturity mismatch as of:</b>						
- 31 December 2019	(179,913)	(575,969)	(1,074,295)	2,994,633	(1,164,456)	
- 31 December 2018	808,125	106,569	(1,436,693)	1,577,925	(1,055,926)	

**33. RISK MANAGEMENT (Continued)**

**33.3. Interest Rate Risk**

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

Interest rate risk is defined as the risk of the possible occurrence of adverse effects to the financial result and equity of the Bank based on the items in the banking book due to the changes in interest rates.

The subjects of the interest rate risk management are all items in the banking book which may cause an adverse effect to the result and capital of the Bank due to the change in interest rates.

The Bank controls interest risk by monitoring the relation between interest-bearing assets/liabilities and their participation in the total assets/liabilities. The Assets and Liabilities Managing Committee monitors the risk of changes in interest rates on all interest-bearing items of assets, liabilities and off-balance sheet items, interest rates' ranges and impact of changes in interest rates on the Bank's revenue, expenses and capital.

By entering into floating interest rates' agreements, the Bank largely impacts on the decrease in risk of changes of interest rates. In practice, the Bank's exposure to interest risk is limited, due to the possibility of harmonizing rates of the loans and deposits, upon the written agreement of retail customers for changing the obligatory agreement elements.

The Bank has established a unique process of interest rate risk management that identifies and assesses the impact of the Bank's activities on its interest rate risk exposure, i.e. identifies and assesses their impact on the Bank's performance and equity.

The Bank's interest risk management involves an integrated process that includes:

1. Identifying the interest rate risk;
2. Measurement or interest rate risk assessment;
3. Mitigation of interest rate risk;
4. Monitoring and control of interest rate risk; and
5. Reporting on interest rate risk.

Identification of the interest rate risk comprehensively identifies causes that lead to the occurrence of the interest rate risk/factors in a timely manner, which involves the determination of the current exposure to interest rate risk (interest-bearing assets and liabilities) and optional risk and exposure to interest rate risk on the bases of new business products and activities, on positions carried in the banking book.

Identification of the interest rate risk causes/factors is performed by the Treasury and Liquidity Sector in cooperation with the Risk Management Sector and the Finance and Planning Sector.

Measurement of interest rate risk is a quantitative and a qualitative assessment of the interest risk exposure using the GAP analysis, ratio analysis, Black-Scholes model (for risk options) and stress testing, which are conducted at least on a monthly basis in the ordinary course of business and are the responsibility of the Risk Management Sector.

### **33. RISK MANAGEMENT (Continued)**

#### **33.3. Interest Rate Risk (Continued)**

## NOTES TO THE FINANCIAL STATEMENTS

For the Year Ended 31 December 2018

The Risk Management Sector analyses the impact of changes in interest rates or interest rate repricing pursuant to the Methodology for interest sensitive asset and liability items on a monthly basis and measures the effects of a standard interest rate shock of 200bp on the economic value of the Bank in relation to the Basel limit of 20% of regulatory capital (*Tier 1 + Tier 2*), which at the same time represents the maximal limit of the acceptable risk by the Bank.

Mitigation of interest rate risk represents the determination of measures and policies to mitigate interest rate risk, i.e., maintaining the risk at acceptable level for the Bank's risk profile.

By monitoring the interest rate risk the process of current status, changes and trends in risk exposure is defined. The Risk Management Sector monitors compliance with the defined limits.

In 2019, the Bank continued the control activities and measuring the interest rate risk applying the standard interest rate shock of 200bp to the items in the banking book on the major currencies individually and for all other currencies on a group basis; the results are presented in the table below.

The Bank's exposure to risk of changes in interest rate (*Repricing Gap Report*) as of **31 December 2019** with comparative presentation of effects for 2018 is presented in the table below.

Change in economic value in the banking book - total (in aggregate)					
Vremenski period	Marginal gap		Weighting factor	Effect on economic value in the banking book	
	Total in RSD	Total in EUR		Total in RSD	Total in EUR
Up to 1 m	112,561,473	957,214	0.08%	90,049	766
1 - 3 m	(481,261,313)	(4,092,609)	0.32%	(1,540,036)	(13.096)
3 - 6 m	131,838,621	1,121,145	0.72%	949,238	8.072
6 - 12 m	(905,728,824)	(7,702,247)	1.43%	(12,951,922)	(110.142)
1 - 2 y	(386,192,427)	(3,284,150)	2.77%	9,497,818	(90.971)
2 - 3 y	1,326,950,534	11,284,284	4.49%	59,580,079	506.664
3 - 4 y	489,987,081	4,166,812	6.14%	30,085,207	255.842
4 - 5 y	197,586,163	1,680,257	7.71%	15,233,893	129.548
5 - 7 y	91,091,893	774,638	10.15%	9,245,827	78.626
7 - 10 y	-	-	13.26%	-	-
10 - 15 y	-	-	17.84%	-	-
<b>Total</b>	<b>576,833,201</b>	<b>4,905,345</b>		<b>89,994,805</b>	<b>765.309</b>
Regulatory capital as of 31 December 2018:				1.442.054.000	12.263.115
Effect of standard shock impact of +200bp				+6.24%	+6.24%
<b>Stress test results as of 31 December 2018:</b>					
Regulatory capital as of 31 December 2018:				1,550,943,000	13,121,945
Effect of standard shock impact of +200bp				+3,68%	+3,68%

## 33. RISK MANAGEMENT (Continued)

## 33.3. Interest Rate Risk (Continued)

Standard interest rate shock of 200bp on the banking book positions of all major currencies individually (EUR and RSD) and for other currencies in total (USD, CHF, GBP, and RUB) was applied for calculation of the Bank's exposure to interest rate risk.



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

Interest sensitive positions of the banking book are positioned in time zones in a way presented in the following tables while weighting factors used are based on estimated interest rate rise of 200bp and estimated modified duration for each time zone taken from Basel documents named *"Principles for the Management and Supervision of Interest Rate Risk"*.

Positions with fixed interest rate are placed in time zones according to a time to maturity, while positions with variable interest rate are placed in time zones according to date of next interest rate change (repricing).

The Risk Management Sector conducts at least monthly the stress testing of materially significant risks, including the effects of changes in interest rates, in accordance with the nature and level of risks the Bank is exposed to, on income and economic value of the Bank, i.e., the impact on the regulatory capital and capital adequacy, using the interest rate repricing analysis, as presented in the table below:

<u>Scenario</u>	<u>Change in market interest rates</u>	In RSD thousand
		<u>Interest rate risk 2019</u>
1	1%	16,206
2	2%	32,411
3	-1%	(16,206)
4	-2%	(32,411)

<u>Scenario</u>	<u>Change in market interest rates</u>	In RSD thousand
		<u>Interest rate risk 2018</u>
1	1%	28,502
2	2%	57,004
3	-1%	(28,502)
4	-2%	(57,004)

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**33. RISK MANAGEMENT (Continued)**

**33.3. Interest Rate Risk (Continued)**

According to the results of stress testing changes the economic value of the banking book for 200 bp, i.e. for standard shock as defined by the Basel Committee, at the end of the year would be as follows:

1. Under the influence of the standard shock on the economic value of individual major currencies (materially significant), they would have a positive effect of 4.62% for the marginal gap in EUR and the positive effect of 2.25% for the marginal gap in RSD, a negative effect of -0.06% for USD and a negative effect of -0.56% for other immaterial currencies (in relation to the regulatory capital).
2. According to the impact of the standard shock on the economic value in total, they would have a positive effect of 6.24% for the marginal gap in respect of the regulatory capital.

In both cases of stress testing (1 and 2), the effect of the standard shock (increase in interest rates of 2% (200 bp) on the economic value (total regulatory capital of the Bank) in the banking book is under the Basel limit of 20%, as well as for the entire period during the year.

**33.4. Market Risks**

Market risk is the possibility of adverse effects to the financial result and capital of the Bank arising from changes in the value of balance sheet and off-balance sheet items of the Bank due to fluctuations in market prices.

Market risks include: foreign currency risk, price risk (on debt and equity securities) and commodity risk.

The Bank is not exposed to the risk of changes in equity instruments price and the price of goods. Except for the concentration of foreign currency risk, the Bank has no significant concentration of market risk for other items.

**33.4.1. Foreign Currency Risk**

Foreign currency risk is the risk of adverse effects to the financial result and capital of the Bank due to changes in foreign exchange rates. The Bank is exposed to the foreign currency risk based on the items recorded in the banking and trading books.

The ALCO Committee has established the limits for foreign currency position for each materially significant foreign currency. The positions are monitored on a daily basis to ensure positions are maintained within the established limits.

In accordance with the National Bank of Serbia's requirements, the Bank regularly maintains its foreign currency position - foreign currency risk indicator within maximal regulatory limits, determined in relation to the regulatory capital. The foreign currency risk indicator is the ratio between the total open net foreign currency position (including the absolute value of the net open position in gold) and the Bank's capital, which are calculated in accordance with the decision regulating the Bank's capital adequacy.

The Bank maintains the relation between assets and liabilities in such a manner that its total net open foreign currency position (including the absolute value of the net open position in gold) at the end of each working day does not exceed 20% of the capital.

**33. RISK MANAGEMENT (Continued)**

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**33.4. Market Risks (Continued)****33.4.1. Foreign Currency Risk (Continued)**

During 2019 the Bank strictly paid attention to reconcile the foreign currency risk indicator with the prescribed limit, where this indicator was mostly at the level below the limit for the whole period during the year.

The objective of foreign currency risk management is to ensure the safe operations of the Bank, by minimizing the adverse effects of the exchange rates fluctuations to the financial result and capital of the Bank, for the positions maintained in the banking and trading books.

The Bank has established a unified process of currency risk management which identifies and assesses the impact of the Bank's activities on its exposure to foreign exchange risk, i.e. identifies and assesses their impact on the result and equity.

The Bank's foreign currency risk management involves an integrated process that includes:

1. Identifying the foreign currency risk;
2. Measurement or foreign currency risk assessment;
3. Mitigation of foreign currency risk;
4. Monitoring and control of foreign currency risk; and
5. Reporting on foreign currency risk.

By identifying foreign currency risk, the Bank in a comprehensive and timely manner identifies the causes/factors that lead to emergence of foreign currency risk, which includes determining the current exposure and currency risk exposure arising from new business products and activities. This activity is the responsibility of the Risk Management Sector, in cooperation with the Financing and Planning Sector and the Treasury and Liquidity Sector.

Measurement of the foreign currency risk represents a quantitative and qualitative assessment of the Bank's exposure to foreign currency risk using the GAP analysis (currency structure), ratio analysis, VaR methodologies of the Group, Black-Scholes model (delta-weighted position) and stress testing. The Risk Management Sector applies on a daily basis the measurement techniques for foreign currency risk indicators and OCP exposures and the stress testing is performed at least quarterly.

The Risk Management Sector performs the stress testing of the sensitivity of the Bank's positions to changes in foreign currency rates at least quarterly, and informs the Bank's Executive Board, ALCO Committee, Audit Committee, Board of Directors and the shareholder "AZRS INVEST" d.o.o. Belgrade.

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**33. RISK MANAGEMENT (Continued)**

**33.4. Market Risks (Continued)**

**33.4.1. Foreign Currency Risk (Continued)**

The following tables present the currencies in which the Bank has significant exposure of its non-trading monetary assets and liabilities to foreign currency risk as of 31 December 2019 and 2018.

The analysis presented calculates the effect of the reasonable changes in the exchange rates in relation to RSD, with other variables held constant. Negative values refer to potential decreases in the result of operations (profit/loss) or equity, while the positive values refer to their increase.

<u>Currency</u>	Changes in exchange rate (%)	In RSD thousand Effects to result before tax
	<u>2019</u>	<u>2019</u>
EUR	-20%	7,840
CHF	-20%	(83)
USD	-20%	(820)

<u>Currency</u>	Changes in exchange rate (%)	In RSD thousand Effects to result before tax
	<u>2018</u>	<u>2018</u>
EUR	-20%	22,553
CHF	-20%	(1,682)
USD	-20%	(488)

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**33. RISK MANAGEMENT (Continued)**

**33.4. Market Risks (Continued)**

**33.4.1. Foreign Currency Risk (Continued)**

The following table presents the Bank's exposure to foreign currency risk (including a foreign currency clause) as of **31 December 2019**. The table includes assets and liabilities at their carrying amounts.

						In RSD thousand	
					Total sub- balance sensitive to changes in foreign exchange rate	Sub- balance not sensitive to changes in foreign exchange rate	Total
	EUR	USD	CHF	Other currencies			
<b>ASSETS</b>							
Cash and balances with central bank	893,203	44,001	9,104	2,546	948,854	674,049	1,622,903
Pledged financial assets	-	-	-	-	-	208,075	208,075
Securities	1,190,368	-	-	-	1,190,368	642,016	1,832,384
Loans and advances to banks and other financial organizations	449,310	609,030	3,923	22,159	1,084,422	124	1,084,546
Loans and advances to customers	3,400,120	-	-	-	3,400,120	592,891	3,993,011
Intangible assets	-	-	-	-	-	47,738	47,738
Property, plant and equipment	-	-	-	-	-	139,458	139,458
Investment property	-	-	-	-	-	19,610	19,610
Deferred tax assets	-	-	-	-	-	6,123	6,123
Non-current assets held for sale	-	-	-	-	-	376,516	376,516
Other assets	5,154	-	-	-	5,154	107,564	112,718
<b>Total assets</b>	<b>5,938,155</b>	<b>653,031</b>	<b>13,027</b>	<b>24,705</b>	<b>6,628,918</b>	<b>2,814,164</b>	<b>9,443,082</b>
<b>Off-balance sheet items - purchase EUR for RSD, sale EUR for RUB</b>	<b>352,778</b>	<b>-</b>	<b>-</b>	<b>117,247</b>	<b>470,025</b>		
<b>LIABILITIES</b>							
Deposits and other financial liabilities to banks, other financial organizations and central bank	23,842	-	-	-	23,842	221,976	245,818
Deposits and other financial liabilities to customers	6,064,728	652,591	8,929	13,217	6,739,465	709,348	7,448,813
Changes in fair value of items that are hedged	-	-	-	-	-	447	447
Subordinated liabilities	-	-	-	131,968	131,968	-	131,968
Provisions	430	18	-	-	448	16,933	17,381
Deferred tax liabilities	-	-	-	-	-	4,087	4,087
Other liabilities	113,831	6	-	-	113,837	67,516	181,353
<b>Total liabilities</b>	<b>6,202,831</b>	<b>652,615</b>	<b>8,929</b>	<b>145,185</b>	<b>7,009,560</b>	<b>1,020,307</b>	<b>8,029,867</b>
<b>Equity</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1,413,215</b>	<b>1,413,215</b>
<b>Total liabilities and equity</b>	<b>6,202,831</b>	<b>652,615</b>	<b>8,929</b>	<b>145,185</b>	<b>7,009,560</b>	<b>2,433,522</b>	<b>9,443,082</b>
<b>Off-balance sheet items - purchase EUR for RSD, sale EUR for RUB</b>	<b>117,593</b>				<b>117,593</b>		
<b>Net foreign currency position as of:</b>							
<b>-31 December 2019</b>	<b>(29,491)</b>	<b>416</b>	<b>4,098</b>	<b>(3,233)</b>	<b>(28,210)</b>		
<b>-31 December 2018</b>	<b>(107,952)</b>	<b>8,406</b>	<b>2,442</b>	<b>1,664</b>	<b>(95,440)</b>		

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**33. RISK MANAGEMENT (Continued)**

**33.5. Exposure Risk (Concentration Risk)**

Concentration risk is the risk that directly or indirectly arises from the Bank's exposure to the same or a similar source of risk, i.e., the same or similar type of risk.

The concentration risk relates to:

- Large exposures;
- Exposure group with the same or similar risk factors, such as economic sectors, geographic regions, product types and the like; and
- Credit protection instruments, including the maturity and currency mismatch between the large exposures and credit protection instruments of these exposures.

Monitoring the Bank's exposure risk to a single party or a group of related parties falls within the competence of an organizational unit responsible for approving the placements. Monitoring the Bank's exposure to this risk is a compulsory part of the procedures in the phase of granting loans in the sense that the committee approving the Bank's placements has the information regarding the total amount of the Bank's exposure to a single party or a group of related parties in relation to the Bank's capital.

Control of concentration risk is done by establishing appropriate exposure limits that allow diversification of the loan portfolio. In addition to the regulatory-defined method of measuring concentration risk (over the limit), the Bank uses two commonly used measures of concentration: the concentration ratio and the *Herfindahl-Hirschman Index (HHI)*.

The concentration ratio - CR5 (a measure of the concentration of the five largest exposures for which applies: low concentrations of 0-50%, the middle concentration of 50-80% and a high concentration of 80-100%) represents the sum of number of the largest percentage shares of exposure in regulatory capital, while the *Herfindahl-Hirschman index* is the sum of the squares of all percentage shares of exposure in regulatory capital. For both measures the following relations apply: the more diversified the credit portfolio is (lower concentration), the lower are the values of these measures.

Mitigation of concentration of risks is conducted by the Bank by active management of the credit portfolio, as well as by adapting the established limits.

In 2019 the Bank maintained the exposure risk indicators within the prescribed values. By implementing appropriate activities anticipated by the relevant procedures and decisions on credit approval, the Bank has strived to ensure the scope and the structure of its operations and risky placements to be reconciled with the performance indicators prescribed by the National Bank of Serbia.

In accordance with the Risk management policies and regulations, the Board of Directors approves the exposures and limits, i.e. the loan concentration on certain legal entities or a group of related parties, and persons related to the Bank.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**33. RISK MANAGEMENT (Continued)**

**33.5. Exposure Risk (Concentration Risk) (Continued)**

Additional supervision of the exposure risk indicators is performed in the Risk Management Sector, which reports to the Bank's management. The procedures of exposure risk management are subject to controls of the internal audit and compliance function.

The Risk Management Sector is in the process of implementation of the Methodology of the manner of determination, revision and abolishing of the internal limits to banks and other financial institutions (counterparty risk).

Counterparty risk is monitored through the process of managing credit risk and market risks. The Risk Management Sector monitors the exposure to financial institutions in terms of internal and regulatory limits on concentration risk. The movement reports are presented to the Treasury and Liquidity Sector and the ALCO Committee.

The Risk Management Sector creates quarterly reports on the concentration of receivables in relation to individual borrowers, groups of related borrowers, industries, countries or geographical areas and in relation to other parameters of importance for managing credit risk, on which it regularly reports to the Bank's Executive Board in the prescribed form.

**33.6. Investment Risk**

The Bank's investment risks include equity investments of the Bank in the other legal entities' capital and in property, plant and equipment.

In accordance with the National Bank of Serbia legislation, the Bank monitors its permanent investments and their relation to the regulatory capital. The Bank also ensures that the investment of the Bank in a single non-financial sector entity does not exceed 10% of its capital, while the total investments of the Bank in non-financial entities and in property, plant and equipment cannot exceed 60% of its capital.

Exposure to the risk of investments into other legal entities and property, plant and equipment is monitored by the organizational unit or the Bank's body competent for procurement of tangible assets and investing in legal entities familiar with the current exposure and the amount of capital for the purposes of acting in timely manner in accordance with the prescribed limits.

Additional supervision of the exposure risk indicators is performed in the Risk Management Sector, which reports to the Bank's management on the matter. The procedures of investment risk management are subject to controls of the internal audit and compliance function.

In 2019 the Bank maintained the permanent investments indicator within the prescribed limits and ensured that investments were reconciled with the ratios prescribed by the National Bank of Serbia.

As of 31 December 2019, the Bank did not have investments into non-financial sector entities, while the indicator of investments into property, plant and equipment amounted to 11,03% of the Bank's regulatory capital.

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
33. RISK MANAGEMENT (Continued)

33.7. Country Risk

The risk related to the Bank's exposure to counterparty's country of origin includes adverse effects which may influence financial result and capital of the Bank, as the Bank might not be able to collect receivables from this counterparty, as a result of political, economic or social situation in the country of origin.

Country risk includes the following risks:

- **Political and economic risk**, which means the probability of loss due to the inability to collect Bank's receivables due to the limitations established by acts of government or other authority in the country of origin of the debtor, as well as general and systemic conditions in that country; and
- **Transfer risk**, which implies the possibility of realizing a loss due to the inability to collect receivables denominated in a currency that is not the official currency of the debtor's country of origin. This may result from imposed limitations on payment of obligations to foreign creditors in a particular currency which is determined by the acts of government and other debtors of the country of origin.

The Risk Management Sector is responsible for managing the Bank's exposure to country risk.

The Bank's limits of exposure to the country risk are determined individually by debtors' country of origin. In case of a concentration of exposures by geographic regions, limits are established on a regional basis.

In determining the level of the allowance for impairment and provision for risks per states, the Bank takes into account the country risk.

The Bank conducts the major part of its business operations and in particular granting activities on the territory of the Republic of Serbia and to the local customers, while it is exposed to the country risk in the portion of assets it keeps on the accounts with foreign banks.

The Bank has implemented the policy of the country risk management in such a way that it constantly monitors its exposure to this type of the risk compared to adopted limits which are determined based on the rating of countries determined by competent institutions (OECD), regularly informing the management on such exposures.

The Bank also mitigates the country risk by deploying the policy of placing funds abroad, primarily by depositing funds on a short-term basis with the first class foreign banks.



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**33. RISK MANAGEMENT (Continued)**

**33.8. Operational Risk**

Operational risk is the risk of adverse effects to the financial result and capital of the Bank due to failures in performance of operating activities (unintentional and intentional) in the work of employees, inadequate internal procedures and processes, inadequate management of the information and other systems in the Bank, as well as due to unforeseen external events. This definition includes legal risk, but excludes strategic and reputation risk.

Operational risk also includes: legal risk, risk arising from introduction of new products, activities, processes and systems, as well as the risk of outsourcing activities to third parties and information system risk.

Furthermore, operational risk includes regulatory (*compliance*) risk, as a part of the unique procedure of the Risk Management Sector and Department for Operations Compliance Control and AML, according to their competencies, in the sense of creating a joint base of operational and regulatory risks, monitoring unique limits of risk appetite, as well as management and reporting on risks the Bank is exposed to in its operations.

The operational risk management process assumes the involvement of the Board of Directors, Executive Board, Operational Risks Management Committee, Audit Committee and all other organizational units of the Bank.

The Bank has established a unified process of operational and regulatory risk management, which identifies and assesses the impact of the Bank's activities on its exposure to the above mentioned risks, i.e., identifies and assesses their impact on the result and equity of the Bank.

The Bank's operational and regulatory risk management involves an integrated process that includes:

1. Identifying the risk;
2. Measurement or risk assessment;
3. Mitigation of the risk;
4. Monitoring and control of the risk; and
5. Reporting on the risk.

By identifying the operational and regulatory risk, the Bank identifies the causes/factors that lead to the arising of the risk in a comprehensive and timely manner, further implementing risk classification for data collection on operational and regulatory risks and losses (OR base), which involves determining the current exposure and the exposure to the risk of introducing the products/services of the Bank and/or *outsourcing of* activities/services to third parties.

The database containing the information on events based on which losses occurred or may have occurred, in accordance with the prescribed limit, as a consequence of operational or regulatory risk by categories determined in accordance with the loss sources and other criteria for description and classification of events, is loaded with data entry based on the identified risks by types of activities, by the employees responsible for certain operational processes in the Bank by reporting on the risks to the Risk Management Sector for further processing.

The Bank identifies the operational risk retroactively (through entries in the data base on events) and proactively through the periodical self-assessments of the operational risk.

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
**33. RISK MANAGEMENT (Continued)**

**33.8. Operational Risk (Continued)**

Measurement and assessment of operational risk exposure represents the quantitative and/or qualitative assessment of risk identified by the Risk Management Sector, through the application of the methodology for self-assessment of the risks, analysis of the impact on business operations and exposure indicators using the basic indicator - at least annually, as well as by the frequency of movement of key risk indicators (KRI) and stress testing on a quarterly basis.

On assuming the operational risk the Bank is guided by the following principles:

- The analysis of key risk indicators that lead to the occurrence of the operational risk events; and
- The current exposure to operational risk is measured and exposure is assessed based on the introduction of new products and activities and entrusting the activities/services to third parties for the purposes of minimizing the operational risk event.

By the process of mitigating the operational risk, the Bank determines the measures for mitigating the operational risk, which include the following:

- Defining exposure limits;
- Defining key indicators for monitoring and control of exposure; and
- Application of mechanism for transfer of risk.

The Bank has defined and adopted the Policy on Business Continuity and revised Business Continuity Plan (BCP), which also includes Disaster Recovery Plan (DRP), that, along with the accompanying appendices enable smooth and continuous operations of all relevant systems and processes of the Bank, as well as limiting the loss in emergency situations. These plans were adequately tested during 2019.

The process of monitoring and reporting on the effects of the realization of implemented measures and techniques for mitigating the operational risk is performed by the Risk Management Sector through regular reporting to the Operational and Compliance Risk Management Committee and the Executive Board. The Department for Operations Compliance Control and AML performs identification, monitoring and reporting on the effects of realisation of the applied measures and regulatory (*compliance*) risk mitigation techniques.

The system of reporting on operational risk includes the timely reporting on operational risk events by type of event and lines of business, causes and sources of events, importance of events, exposure trend, measures intended to be undertaken or have been undertaken in order to mitigate and limit the consequences of the events and activities the Bank entrusted to third parties, as well as limits for the new products.

Decision on outsourcing or the change of the provider of a service and introduction of a new product, and procedures for its change is in the hands of the Executive Board of the Bank, based on the Operational and Compliance Risk Management Committee proposal.

Measurement and management of the process of outsourcing is based on the identification and assessment of all the risks associated with the activities of the assignment of activities to third parties (externalization), which may have an impact on: the continuity of operations of the Bank; costs, financial results, liquidity, solvency and capital; the Bank's risk profile; service quality and reputation of the Bank. The introduction of new products/services is treated in an analogous way.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**33. RISK MANAGEMENT (Continued)**

**33.8. Operational Risk (Continued)**

During 2018 the Risk Management Sector reported to the Operational and Compliance Risk Management Committee, the Executive Board of the Bank and the former Parent Bank (until Bank's shares were sold to other shareholder) by submitting periodical reports on the recorded operational events that may have adverse effects to the capital and capital adequacy with the proposal of measures to be undertaken for their elimination/mitigation. It also communicated the deadlines and conclusions reached by the Committee to the responsible personnel. Likewise, the Risk Management Sector monitors the execution of related tasks and informs the Committee thereon.

On a quarterly basis, data on capital requirement for operational risk under the BIA approach with data on exposure indicator that enters into the basis for calculation are submitted to the National Bank of Serbia. In addition, at the request of the National Bank of Serbia, the data about the Base of operational events and the Minutes of meetings of the Operational and Compliance Risk Management Committee are submitted.

In 2019, potential operational events related to credit risk originating from prior periods were recorded in the Base of operational losses (Note 38(b)).

**33.9. Risk of Early Repayment**

The risk of early repayment is the risk that the Bank will realize a financial loss if customers repay their obligations to the Bank or require repayment before or after the expected deadline.

The effect on the net interest income, i.e., annual profit/(loss) before income tax and equity, assuming that 10% of the financial instruments are to be prepaid at the beginning of the year, with other variables held constant, is as follows:

<u>Currency</u>	In RSD thousand	
	<u>Effect to the net interest income 2019</u>	<u>Effect to the net interest income 2018</u>
EUR	(1,887)	(1,355)
Other currencies	(2,289)	(2,789)

## NOTES TO THE FINANCIAL STATEMENTS

For the Year Ended 31 December 2018

**34. INFORMATION SYSTEM RISK**

The information system (IS) risk, as a component of the operational risk, is the possibility of adverse effects on the financial performance and capital, achieving the business results, business operations in accordance with the regulations and reputation of the Bank due to inadequate management of the information system or any other system weakness that adversely affects the functionality or safety of the system and/or jeopardizes business continuity.

The Bank manages IS risks through an integrated process of Bank's operational risk and business continuity management, which defines the identification, assessment, analysis and monitoring of operational risks and the associated risks - the IS risk, as well as measures for their mitigation, prevention and control in accordance with the legal regulations and internal documents.

IS risk assessment is carried out at least once a year as part of a comprehensive self-assessment of operational risks in the Bank on the processes containing the information component and according to the dynamics of assessment of the Analysis of the influence on operations, which includes the process in which the organizational units of the Bank, in collaboration with the Risk Management Sector, observe the IS risk register and indicate the extent to which they are exposed to certain IS risks.

IS risk assessment allows process owners to timely identify and assess the risks that affect the processes for which they are responsible. After the completion of the regular risk assessment of IS, the Risk Management Sector creates the IS risk assessment report as an integral part of self-assessment of operational risk in the Bank, which is submitted to the Bank's bodies for review and approval.

**35. FAIR VALUE MEASUREMENT**

The fair value presented in financial statements is the amount for which an asset may be exchanged, or a liability settled, between informed, willing parties in an arm's length transaction. Fair value is calculated using market information available as at the reporting date as well as the individual assessment methods of the Bank.

The fair value of a financial instrument presented at nominal value is approximately equal to its carrying value. This includes cash as well as liabilities and receivables without defined maturity or fixed interest rate.

For other liabilities and receivables the expected future cash flows are discounted up to their present value by means of current interest rate. Considering that the variable interest rates are contracted for the majority of Bank assets and liabilities, changes in the current interest rates lead to changes in the contracted interest rates.

Quoted market prices are used for trading securities. The fair value of other securities is calculated as net present value of the future expected cash flows.

Fair value of irrevocable commitments and contingent liabilities equals their carrying value.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**35. FAIR VALUE MEASUREMENT (Continued)**

**Measurement of Financial Instruments**

The Bank measures fair value by means of the following fair value hierarchy reflecting the importance of the inputs used in measurement:

- **Level 1:** Quoted market prices (uncorrected) in active markets for identical instrument.
- **Level 2:** Assessment techniques based on the observable inputs that are not the quoted prices from the level 1, whether directly (as prices) or indirectly (derived from prices). This category includes instruments valued through their use: quoted prices in active markets for similar instruments; stated prices for same or similar instruments in the markets considered as less active; or other assessment techniques in which all important inputs are directly or indirectly observable from the market data.
- **Level 3:** Assessment techniques used for non-observable inputs. This category includes all instruments relative to which the valuation techniques include inputs not based on observable data and non-observable inputs that have a significant effect on the valuation of the instruments. This category includes instruments valued on the basis of quoted prices of similar instruments with significant non-observable adjustments or assumptions necessary to maintain the difference between the instruments.

Fair value of financial assets and liabilities traded in active markets is based on quoted market prices or prices quoted by dealers. For all other financial instruments the Bank determines fair value by means of assessment techniques.

Assessment techniques include net present value and discounted cash flow models, comparisons with similar instruments for which there is an observable market price and other assessment models. Assumptions and inputs used in assessment techniques include risk free and benchmark interest rates, loan margins and other premiums used in assessment of discount rate, bond and share prices, foreign currency exchange rates, capital and capital indexed prices and expected oscillations of the prices and correlations.

The aim of assessment techniques is to determine the fair value which reflects the price of a financial instrument as at the reporting date that would be defined by market participants in free transactions carried out at an arm's length.

The Bank uses widely accepted assessment models in determining the fair value of common and simpler financial instruments such as interest rates and currency swaps which make use only of observable market data and require little judgement and assessment by the management. Quoted prices and model inputs are usually (relatively) available in the market for quoted debt and proprietary securities, trading derivatives and simple derivatives such as interest rate swaps.

The availability of the observable market prices and model inputs decreases the need for assessment by management and reduces the uncertainty arising from determining the fair value. The availability of the observable market data and inputs varies based on the product and market and is prone to change due to particular occurrences and general condition of the future markets.

NOTES TO THE FINANCIAL STATEMENTS  
 For the Year Ended 31 December 2018  
**35. FAIR VALUE MEASUREMENT (Continued)**

The following table presents the fair value of financial instruments not measured at fair value and analyses them according to the fair value hierarchy within which the fair value measurement takes place:

	31 December 2019		31 December 2018	
	Carrying value	Fair value	Carrying value	Fair value
<b>Financial (monetary) assets</b>				
Cash and balances with central bank	1,622,903	1,622,903	1,969,175	1,969,175
Securities	1,832,384	1,832,384	1,856,532	1,856,532
Loans and advances to banks and other financial organisations	1,084,546	1,084,546	1,996,367	1,996,367
Loans and advances to customers	3,993,011	3,234,339	3,912,191	3,289,733
Other assets	112,718	112,718	43,172	43,172
<b>Total</b>	<b>8,645,562</b>	<b>7,886,890</b>	<b>9,777,437</b>	<b>9,154,979</b>
<b>Financial (monetary) liabilities</b>				
Deposits and other financial liabilities to banks and other financial organisations	245,8181	245,818	15,674	15,674
Deposits and other financial liabilities to customers	7,448,813	7,448,813	8,414,173	8,492,983
Subordinated liabilities	131,968	131,968	115,760	176,542
Other liabilities	183,353	183,353	56,861	56,861
<b>Total</b>	<b>8,009,952</b>	<b>7,826,599</b>	<b>8,602,468</b>	<b>8,742,060</b>

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**35. FAIR VALUE MEASUREMENT (Continued)**

*Fair Value Hierarchy Analysis*

	In RSD thousand			
	Fair value			
31 December 2019	Level 1	Level 2	Level 3	Total
<b>Assets</b>				
Financial assets at fair value through other comprehensive income	1,832,384	-	-	1,832,384
Loans and advances to banks and other financial organizations	-	1,084,546	-	1,084,546
Loans and advances to customers	-	3,234,339	-	3,234,339
<b>Total</b>	<b>1,832,384</b>	<b>4,318,885</b>	<b>-</b>	<b>6,151,269</b>
<b>Liabilities</b>				
Deposits and other financial liabilities to banks and other financial organisations	-	245,818	-	245,818
Deposits and other financial liabilities to customers	-	7,448,813	-	7,448,813
Subordinated liabilities	-	131,968	-	131,968
<b>Total</b>	<b>-</b>	<b>7,826,599</b>	<b>-</b>	<b>7,826,599</b>

	In RSD thousand			
	Fair value			
31 December 2018	Level 1	Level 2	Level 3	Total
<b>Assets</b>				
Financial assets at fair value through other comprehensive income	1,856,532	-	-	1,856,532
Loans and advances to banks and other financial organizations	-	1,996,367	-	1,996,367
Loans and advances to customers	-	3,289,733	-	3,289,733
<b>Total</b>	<b>1,856,532</b>	<b>5,286,100</b>	<b>-</b>	<b>7,142,632</b>
<b>Liabilities</b>				
Deposits and other financial liabilities to banks and other financial organisations	-	15,674	-	15,674
Deposits and other financial liabilities to customers	-	8,492,983	-	8,492,983
Subordinated liabilities	-	176,542	-	176,542
<b>Total</b>	<b>-</b>	<b>8,685,199</b>	<b>-</b>	<b>8,685,199</b>

## NOTES TO THE FINANCIAL STATEMENTS

For the Year Ended 31 December 2018

## 35. FAIR VALUE MEASUREMENT (Continued)

Where possible, fair value of loans and advances is based on the observable market transactions. If observable market transactions are not available, fair value is assessed by means of assessment models such as cash flow discount techniques.

Assessment technique inputs include the expected credit losses over the course of loan duration, interest rates, advances, and source data or secondary market data. For collateral dependant reduced (impaired) loans, fair value is measured based on the value of the related collateral. Model inputs may include data by third party brokers based on the OTC trading activity, and information obtained from other market participants which include observable primary and secondary transactions.

In order to improve the accuracy of assessment of retail loans and smaller commercial loans, homogenous loans are grouped into portfolios according to similar characteristics such as origin, LTV ratios, quality of collateral, type of product and debtor, advances and non-performance rates, and standard probability.

Fair value of clients and banks' deposits is determined by using discounted cash flows technique by applying rates offered for deposits of similar maturity and conditions. Fair value of a vista deposits is the amount for payment as at the reporting date.

Table below presents Bank classification for each class of financial assets and liabilities at carrying value and their fair value as of **31 December 2019**:

	Measured at fair value	FVOCI securities	Amortised cost	In RSD thousand	
				Total carrying value	Fair value
Cash and balances with central bank	1,622,903	-	-	1,622,903	1,622,903
Financial assets at fair value through other comprehensive income	-	1,832,384	-	1,832,384	1,832,384
Loans and advances to banks and other financial organizations			1,084,546	1,084,546	1,084,546
Loans and advances to customers	-	-	3,234,339	3,234,339	3,234,339
Other assets			112,718	112,718	112,718
<b>Total assets</b>	<b>1,622,903</b>	<b>1,832,384</b>	<b>4,431,603</b>	<b>7,886,890</b>	<b>7,886,890</b>
Deposits and other financial liabilities to banks and other financial organisations	-	-	245,818	245,818	245,818
Deposits and other financial liabilities to customers	-	-	7,448,813	7,448,813	7,448,813
Subordinated liabilities	-	-	131,968	131,968	131,968
Other liabilities	-	-	183,353	183,353	183,353
<b>Total liabilities</b>	<b>-</b>	<b>-</b>	<b>8,009,952</b>	<b>8,009,952</b>	<b>8,009,952</b>



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**35. FAIR VALUE MEASUREMENT (Continued)**

Table below presents Bank's classification for each class of financial assets and liabilities at carrying value and their fair value as of **31 December 2018**:

	In RSD thousand				
	Measured at fair value	FVOCI securities	Amortised cost	Total carrying value	Fair value
Cash and balances with central bank	1,969,175	-	-	1,969,175	1,969,175
Financial assets at fair value through other comprehensive income	-	1,856,532	-	1,856,532	1,856,532
Loans and advances to banks and other financial organizations	-	-	1,996,367	1,996,367	1,996,367
Loans and advances to customers	-	-	3,912,191	3,912,191	3,289,733
Other assets	-	-	43,172	43,172	43,172
<b>Total assets</b>	<b>1,969,175</b>	<b>1,856,532</b>	<b>5,908,558</b>	<b>9,777,437</b>	<b>9,154,979</b>
Deposits and other financial liabilities to banks and other financial organisations	-	-	15,674	15,674	15,674
Deposits and other financial liabilities to customers	-	-	8,414,173	8,414,173	8,492,983
Subordinated liabilities	-	-	115,760	115,760	176,542
Other liabilities	-	-	56,861	56,861	56,861
<b>Total liabilities</b>	<b>-</b>	<b>-</b>	<b>8,602,468</b>	<b>8,602,468</b>	<b>8,742,060</b>

Methodology and assumptions used in determining fair value of those financial instruments not yet recorded at fair value in the financial statements are described below.

***Assets whose Fair Value Approximates their Carrying Value***

For financial assets and liabilities that are liquid or have short term maturity (less than one year), the assumption is that their carrying value approximates their fair value. This assumption is also applied to *a vista* deposits, non-term savings accounts, and financial instruments with variable rate.

***Financial Instruments with Fixed Rate***

Fair value of financial assets and liabilities with fixed rate recorded at amortised value is assessed by comparison with market interest rates at initial recognition based on the current market rates offered for similar financial instruments.

The assessed fair value of deposits with fixed interest rate is based on the discount of cash flows by applying the prevailing interest rates to money market debt with similar risk and maturity.

## NOTES TO THE FINANCIAL STATEMENTS

For the Year Ended 31 December 2018

**36. INTERNAL ASSESSMENT OF CAPITAL ADEQUACY**

Internal assessment of capital adequacy is the process of assessment of all significant risks to which the Bank is or might be exposed in its operations. The process of internal assessment of capital adequacy includes the following phases:

1. Identification of the material significance of the risk;
2. Calculation of the amount of internal capital requirements for individual risks;
3. Determining total internal capital requirements; and
4. Comparison of the following elements:
  - The amount of capital calculated in accordance with the National Bank of Serbia's Decision governing the banks capital adequacy and available internal capital;
  - Minimum capital requirements calculated in accordance with the National Bank of Serbia's Decision governing the banks capital adequacy and internal capital requirements for individual risks; and
  - Sum of minimal capital requirements calculated in accordance with the National Bank of Serbia's Decision governing the banks capital adequacy and total internal capital requirements.

The analysis of the risk profile of the Bank identified the risks for which the Bank will calculate capital requirements in the process of internal capital adequacy assessment, such as: credit risk, market risk, operational risk, liquidity risk, interest rate risk in the banking book, concentration risk, strategic risk, credit and foreign exchange risk and other material risks.

For other types of risks the Bank is exposed to in its operations, the Bank will calculate capital requirements if they are identified as material, by applying adequate linear percentage on the basis of the subjective assessment of the management of the Bank. The Bank manages the above mentioned risks using the techniques for mitigation/risk transfer and has set forth certain procedures for risk management and other internal regulations.

Determination of the total internal capital available for risk coverage is performed by adding up capital requirements for individual materially significant risks.

Comparison of the amount of the required internal capital to the amount of capital calculated in accordance with the National Bank of Serbia's Decision governing the capital adequacy is performed quarterly, through the preparation and analysis of reports regarding the process of internal assessment of capital adequacy. The report is prepared by the Risk Management Sector.

The Risk Management Sector informs the Executive Board, the Assets and Liabilities Management Committee, the Audit Committee and the Bank's Board of Directors on the calculated internal assessment of capital adequacy.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**37. CAPITAL MANAGEMENT**

**a) Regulatory Capital**

The Bank permanently manages its capital, which is a broader concept than “equity” stated in the balance sheet, in order to:

- Comply with the capital requirements set by the National Bank of Serbia;
- Ensure the ability to continue as a going concern on a long-term basis, together with providing a profit to shareholders and benefits to other stakeholders; and
- Maintain an adequate capital base to support the development of its business.

The Bank’s management monitors regularly the Bank’s capital adequacy ratios and other performance indicators established by the National Bank of Serbia and delivers to the National Bank of Serbia quarterly reports on achieved (realised) indicators.

The Bank manages its capital structure and makes adjustments to it in the light of changes in economic conditions and the risk characteristic of its activities. The Bank’s capital management strategy defines the relationship to capital in a way that ensures capital management on an ongoing and long-term basis.

The aim of the strategy of capital management is to ensure by its implementation the forming and maintenance of an adequate level and structure of internal capital, as well as strengthening the capital base of the Bank. The Bank’s capital management strategy remained unchanged compared to the previous year.

The National Bank of Serbia has defined the following capital limits:

- The minimum amount of the regulatory capital of EUR 10 million in dinar counter value at the official middle exchange rate; and
- The capital adequacy ratio of at least 8%.

In accordance with the Decision on Capital Adequacy of Banks (“RS Official Gazette”, no. 113/2016 and 103/2018 and Decision on Amendments to the Decision on Capital Adequacy of the Bank “RS Official Gazette”, no. 88/2019), the method of calculating capital adequacy ratios has been determined. The capital adequacy ratio of the Bank equals to the ratio between the Bank’s capital and the sum of risk-weighted assets of the Bank. The Bank’s equity consists of the aggregate of basic capital and supplementary capital, net of deductible items defined by the above decision.

Risk-weighted assets represent the sum total of credit risk-weighted balance sheet assets and capital requirement for market risks and capital requirement for operational risk determined in the manner prescribed by the aforementioned decision, multiplied by the reciprocal value of the capital adequacy ratio.

For the calculation of the credit and market (foreign currency) risk-weighted assets the Bank uses the standardised approach (SA), while for the calculation of the exposure indicators (operating risk) it uses the method of basic indicators (BIA). Credit risk-weighted assets of the Bank are the sum of credit risk-weighted balance sheet assets and credit risk-weighted off-balance sheet items.

## NOTES TO THE FINANCIAL STATEMENTS

For the Year Ended 31 December 2018

**37. CAPITAL MANAGEMENT (Continued)****a) Regulatory Capital (Continued)**

Risk-weighted balance sheet items of the Bank, in terms of credit risk exposure, represent the sum total of gross carrying values of the Bank's balance sheet items less allowances for impairment and the required reserve for estimated losses. Risk-weighted off-balance sheet items of the Bank, in terms of credit risk exposure, represent the sum total of gross carrying values of the Bank's off-balance sheet items less provision for losses on off-balance sheet items and the required reserve for estimated losses, multiplied by the appropriate credit conversion factors.

In accordance with the Decision on Capital Adequacy of Banks, the Bank is obliged to, in addition to the minimum amount of capital of EUR 10 million, maintain at all times its capital at the level sufficient to cover all risks the Bank is exposed to or may be exposed to in its operations, at least in the amount of the of the following capital requirements:

- Capital requirement for credit risk, capital requirement risk of the decrease of the value of purchased receivables and capital requirement for counterparty risk for all the Bank's transactions and capital requirement for settlement/delivery risk for activities from the trading book;
- Capital requirement for price risk for activities from the trading book;
- Capital requirement for foreign exchange risk and commodity risk for all transactions of the Bank;
- Capital requirement for credit valuation adjustment risk for all the operations of the Bank (CvA); and
- Capital requirement for operational risk for all activities of the Bank.

For the purposes of determining the regulatory capital and the capital adequacy ratio, the Bank's core (basic) capital as of 31 December 2018 includes the paid-in share capital, while supplementary capital comprises subordinated liabilities. Deductions from capital are losses from prior years, loss for the current year, intangible assets and the amount of required reserves for estimated losses on the balance sheet assets and off-balance sheet items of the Bank.

The reserve for estimated losses arising from credit risk contained in the credit portfolio of the Bank, is calculated in accordance with the National Bank of Serbia Decision on the Classification of Bank Balance Sheet Assets and Off-balance Sheet Items ("RS Official Gazette", no. 94/2011, 57/2012, 123/2012, 43/2013, 113/2013, 135/2014, 25/2015, 38/2015, 61/2016, 69/2016, 91/2016, 101/2017, 114/2017, 103/2018 and 8/2019).

As of 31 December 2018, the required reserve for potential losses that may arise on balance sheet assets and off-balance sheet items amounted to RSD 109,792 thousand.

Decision on amendments to the Decision on the Classification of Bank Balance Sheet Assets and Off-balance Sheet Items ("RS Official Gazette", no. 103/2018), the National Bank of Serbia has abolished the required reserve for estimated losses and the deductible item of capital in accordance with the Decision on Capital Adequacy.

**37. CAPITAL MANAGEMENT (Continued)****a) Regulatory Capital (Continued)**

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

For the purposes of determining the regulatory capital and the capital adequacy ratio, the Bank's core (basic) capital at the reporting date 31 December 2019 includes the paid-in share capital, while supplementary capital comprises subordinated liabilities. Deductions from capital are accumulated losses, loss for year, intangible assets and gross amount of receivables from a debtor - physical body (other than a farmer) originated from consumer, cash or other loans recorded on accounts 102, 107 and 108 where the debt before the loan was approved was higher than the percentage determined in accordance with the decision governing the classification of the bank's balance sheet assets and off-balance sheet items, or this percentage will be higher due to the loan approval, this deduction being applied regardless of whether after the loan approval the borrower's credit level has become lower than that percentage.

As of 31 December 2019, the gross amount of receivables from physical bodies amounted to RSD 1,089 thousand.

The table below summarizes the structure of the Bank's regulatory capital as of 31 December 2019 and 2018, as well as the capital adequacy ratio:

	31 December 2019	In RSD thousand 31 December 2018
<b>Regulatory capital</b>		
<b>Core capital</b>		
Share capital	3,672,407	3,672,407
Accumulated losses	(2,046,031)	(2,076,389)
Loss for the year	(240,795)	
Intangible assets	(47,738)	(50,790)
	<b>1,337,843</b>	<b>1,545,228</b>
<b>Supplementary capital - subordinated liabilities</b>	<b>105,300</b>	<b>115,507</b>
<b>Total core and supplementary capital</b>	<b>1,443,143</b>	<b>1,660,735</b>
<i>Deductible items:</i>		
Gross amount of receivables from physical bodies	(1,089)	-
Required reserve for estimated losses on balance sheet assets and off-balance sheet items	-	(109,792)
<b>Total capital (1)</b>	<b>1,442,054</b>	<b>1,550,943</b>
<b>Risk assets - risk-weighted exposure</b>		
Credit risk exposure	4,799,302	4,708,795
Operational risk exposure	1,078,653	1,038,588
Market risk exposure	49,165	114,240
Adjustment risk exposure	835	-
<b>Total (2)</b>	<b>5,927,946</b>	<b>5,861,623</b>
<b>Capital adequacy ratio - Basic share capital</b>	<b>22.55%</b>	<b>24.49%</b>
<b>Capital adequacy ratio - Basic core capital</b>	<b>22.55%</b>	<b>24.49%</b>
<b>Capital adequacy ratio (1/2 x 100)</b>	<b>24.33%</b>	<b>26.46%</b>

Pursuant to the letter on Bank's Supervision Assessment and VTB Bank and Accompanying Recommendations dated 30 May 2018, the overall capital requirement amounted to 21.58%.

**37. CAPITAL MANAGEMENT (Continued)**

NOTES TO THE FINANCIAL STATEMENTS  
For the Year Ended 31 December 2018  
a) **Regulatory Capital (Continued)**

As of 31 December 2019, the Bank's regulatory capital amounted to RSD 1,442,054 thousand, or EUR 12,263,115 translated at the official middle exchange rate ruling at the balance sheet date (31 December 2018: RSD 1,550,943 thousand, or EUR 13,121,945). The Bank's capital adequacy ratio of 24.33% is higher than the prescribed minimum of 8%.

*Tier 1 Leverage Ratio* representing the ratio of core capital and the amount of the Bank's exposure as of 31 December 2019 amounted to 13.37%.

Pursuant to the National Bank of Serbia's Official Letter on the Bank's Supervision Assessment and Accompanying Recommendations, the Bank is recommended to maintain the regulatory capital at 21.58% of the risky assets, as of 31 December 2019, calculated quarterly for structural system risk.

As of 31 December 2019, the overall capital requirement amounted to 21.58% of the risky assets, calculated as the sum of the total supervision capital requirements and combined protection capital tier on that day.

Pursuant to the Decision of the National Bank of Serbia on Bank Capital Adequacy, as of 31 December 2019 the Bank had sufficient level of capital to meet the minimum requirements of the National Bank of Serbia.

**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

---

**37. CAPITAL MANAGEMENT (Continued)**

**b) Performance Indicators - Compliance with Legal Requirements**

The Bank is obliged to reconcile the scope and the structure of its operations and risky placements with the performance indicators prescribed by the Law on Banks and the relevant decisions of the National Bank of Serbia issued on the basis of the aforementioned Law.

The Bank's performance indicators as of 31 December 2019 were as follows:

<b>Performance indicators</b>	<b>Prescribed</b>	<b>Realised</b>
1. Regulatory capital	Minimum EUR 10 million	12,263,115
2. Capital adequacy ratio	Minimum 8%	24.33%
3. Capital adequacy ratio of basic share capital	Minimum 4.5%	22.55%
4. Capital adequacy ratio - core capital	Minimum 6%	22.55%
5. Bank's investments	Maximum 60% of the capital	11.03%
6. Exposure to a single party or a group of related parties	Maximum 25% of the capital	23.88%
7. The total sum of all large exposures of the Bank in relation to capital	Maximum 400%	131.88%
8. Liquidity ratios as of the last date:		
- in the first month of the last quarter of 2019	Minimum 1	2.57
- in the second month of the last quarter of 2019	Minimum 1	4.34
- in the third month of the last quarter of 2019	Minimum 1	4.31
9. Narrow liquidity coverage ratio	Minimum 0,5	3.99
10. Liquidity coverage ratio (LCR)	Minimum 100%	432.81%
11. Foreign currency risk indicator	Maximum 20% of the capital	2.74%

As of 31 December 2019, the Bank complied all its performance indicators with the prescribed ones.

## NOTES TO THE FINANCIAL STATEMENTS

For the Year Ended 31 December 2018

**38. COMMITMENTS AND CONTINGENT LIABILITIES****a) Litigations**

As of 31 December 2019, the Bank acts as a defendant in 56 litigations. The total estimated amount of the related claims equals RSD 37,518 thousand.

According to the estimate of the Legal Department and the legal advisers of the Bank positive outcome is expected for certain number of the litigations, while uncertain outcome is expected for certain number of the litigations. As disclosed in the Note 28 to the financial statements, as of 31 December 2019, the Bank established the provision for potential losses that may arise from the above litigations in the total amount of RSD 6,899 thousand.

The Bank's management believes that no material losses shall arise on the basis of the outcome of the remaining litigations in progress in excess of the amount for which the provisions were made.

**b) Tax Risks**

Tax system in the Republic of Serbia is undergoing continuous amendments. Tax period in the Republic of Serbia is considered to be open for the five-year period. In different circumstances, tax authorities could have different approach to some problems, and could detect additional tax liabilities together with related penalty interest and fines. The Bank's management believes that tax liabilities recognised in the accompanying financial statements are fairly presented.

**39. RECONCILIATION OF OUTSTANDING BALANCES WITH COUNTERPARTIES**

In accordance with Article 18 of the Law on Accounting, the Bank is obliged to perform reconciliation of receivables and payables with its debtors and customers, and it maintains credible documentation on the circularization process.

The Bank submitted 426 confirmations (IOS forms) to its debtors and customers with the outstanding balance of receivables/payables as of 31 October 2019, out of which 238 confirmations were returned and according to which the unreconciled receivables amounted to RSD 73 thousand, and were reconciled with creditors and suppliers by the end of 2019.

Based on the exchanged confirmations, there are neither disputed confirmations for loans and advances to customers nor for liabilities.

Since the confirmations (IOS form) include a clause stating that "If the recipient does not return the confirmation within a certain period of time, the balance of receivables and payables shall be deemed reconciled", the Bank considers that the outstanding balances stated in the remaining unreturned confirmations, are also reconciled.



**NOTES TO THE FINANCIAL STATEMENTS**  
**For the Year Ended 31 December 2019**

**40. EXCHANGE RATES**


The official median exchange rates of the National Bank of Serbia, determined at the Interbank Foreign Currency Market, used in the translation of balance sheet items denominated in foreign currencies, as of 31 December 2019 and 2018 into the functional currency (RSD), for the major foreign currencies were as follows:


	2019	In RSD 2018
EUR	117.5928	118.1946
USD	104.9186	103.3893
CHF	108.4004	104.9779
RUB	1.6919	1.4841


**41. EVENTS AFTER THE REPORTING PERIOD**

- a) On 17 January 2020, the Bank's Assembly adopted the Decision on Increase the Bank's core capital by issuing ordinary shares with a total nominal value of RSD 240,000,000.00. The subscription and payment period is 90 days from the date of Decision.
- b) In January 2020, the Bank hired the consulting firm FinSelect doo. Novi Sad to make market value assessment of shares with the aim of the Bank's capital increase planned to be done during 2020.
- c) After the reporting period, a global pandemic caused by the COVID 19 virus was declared and on 15 March 2020, a state of emergency was introduced in the Republic of Serbia. Given the nature of Bank's operation (products and services we provide), the aforementioned has not had a significant negative impact so far, since all measures and recommendations of the Government of Serbia have been implemented. At present, management is unable to estimate the overall adverse outcome on the financial result for 2020. Nevertheless, the Management believes that Bank's ability to continue its operations as a going concern will not be cast in doubt. The aforementioned do not require adjustments of the financial statements for the period 01 January - 31 December 2019.

Belgrade, 16.April 2020

  
 Anđelka Stanković  
 Responsible for financial statements  
 preparation

  
 Marija Stepina  
 Executive Board  
 President

  
 Radomir Stevanović  
 Member of the Executive  
 Board

