VÚB BANKA

Interim separate financial statements for the six months ended 30 June 2021

Prepared in accordance with International Accounting Standard
IAS 34 Interim Financial Reporting

VÚB BANKA

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Separate statement of financial position as at 30 June 2021
(In thousands of euro)

	Note	June 2021	December 2020
Assets			
Cash and cash equivalents	7	2 434 409	1 571 629
Financial assets at fair value through profit or loss:	8		
Financial assets held for trading		195 840	85 423
Non-trading financial assets at fair value through profit or loss		7 741	711
Derivatives – Hedge accounting	9	55 890	85 192
Financial assets at fair value through other comprehensive income	10	1 342 518	1 618 067
of which pledged as collateral		*1 219 083*	*634 093*
Financial assets at amortised cost:	11		
Due from other banks		197 635	205 420
Due from customers		15 377 264	14 724 137
Fair value changes of the hedged items in portfolio hedge of interest rate risk	12	12 135	20 016
Investments in subsidiaries, joint ventures and associates	13	69 629	69 629
Property and equipment	14	109 927	113 163
Intangible assets	15	126 909	128 896
Goodwill	16	18 871	18 871
Current income tax assets	17	14 222	26 518
Deferred income tax assets	17	45 621	51 056
Other assets	18	14 881	22 685
Non-current assets classified as held for sale	14	154	1
		20 023 646	18 741 414
Liabilities			
Financial liabilities at fair value through profit or loss:	8		
Financial liabilities held for trading		81 082	87 377
Derivatives – Hedge accounting	9	35 097	65 407
Financial liabilities at amortised cost:	11		
Due to banks		1 227 812	170 671
Due to customers		12 760 307	12 977 960
Lease liabilities		22 259	22 858
Subordinated debt		200 134	200 151
Debt securities in issue		3 850 620	3 422 729
Fair value changes of the hedged items in portfolio hedge of interest rate risk	12	5 129	6 990
Current income tax liabilities	17	328	635
Provisions	19	15 749	14 895
Other liabilities	20	78 855	78 495
		18 277 372	17 048 168
Equity	22		
Share capital		430 819	430 819
Share premium		13 719	13 719
Legal reserve fund		87 493	87 493
Retained earnings		1 192 050	1 134 224
Equity reserves		22 193	26 991
		1 746 274	1 693 246
		20 023 646	18 741 414

The accompanying notes on pages 8 to 153 form an integral part of these financial statements.

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Separate statement of profit or loss and other comprehensive income
for the six months ended 30 June 2021
(In thousands of euro)

	Note	June 2021	June 2020
Interest income calculated using the effective interest method		146 306	160 532
Other interest income		18	150
Interest and similar expense		(14 714)	(20 115)
Net interest income	24	131 610	140 567
Fee and commission income		81 536	77 076
Fee and commission expense		(13 045)	(13 859)
Net fee and commission income	25	68 491	63 217
Dividend income		3 002	4 001
Net trading result	26	13 072	5 206
Other operating income	27	1 003	1 325
Other operating expenses	28	(16 838)	(10 775)
Special levy of selected financial institutions	29	-	(31 038)
Salaries and employee benefits	30	(58 681)	(59 786)
Other administrative expenses	31	(34 460)	(37 291)
Amortisation	15	(8 002)	(6 856)
Depreciation	16	(6 730)	(6 523)
Profit before provisions, impairment and tax		92 467	62 047
Net modification losses		(46)	-
Provisions	19, 32	(9)	112
Impairment losses	21, 33	(16 248)	(30 699)
Net loss arising from the derecognition of financial assets at amortised cost	33	(1 551)	(1 682)
Profit before tax		74 613	29 778
Income tax expense	34	(16 948)	(6 726)
NET PROFIT FOR THE SIX MONTHS		57 665	60 940
Other comprehensive income for the three months, after tax:	35, 36		
Items that shall not be reclassified to profit or loss in the future:			
Reversal of deferred income tax on disposed property and equipment		460	219
Change in value of financial assets at fair value through other comprehensive income (equity instruments)		-	99
		460	318
Items that may be reclassified to profit or loss in the future:			
Change in value of financial assets at fair value through other comprehensive income (debt instruments)		(5 345)	(3 192)
Exchange difference on translation of foreign operations		(22)	(360)
		(5 367)	(3 552)
Other comprehensive income for the three months, net of tax		(4 907)	(3 234)
TOTAL COMPREHENSIVE INCOME FOR THE SIX MONTHS		52 758	19 818
Basic and diluted earnings per € 33.2 share in €		4,44	1,78

The accompanying notes on pages 8 to 153 form an integral part of these financial statements.

Separate statement of profit or loss and other comprehensive income
for the three months ended 30 June 2021
(In thousands of euro)

	Note	June 2021	June 2020
Interest income calculated using the effective interest method		72 124	79 128
Other interest income		18	112
Interest and similar expense		(7 256)	(9 223)
Net interest income	24	64 886	70 017
Fee and commission income		42 893	38 838
Fee and commission expense		(6 875)	(6 974)
Net fee and commission income	25	36 018	31 864
Dividend income		-	-
Net trading result	26	3 974	3 848
Other operating income	27	727	329
Other operating expenses	28	(2 651)	(2 345)
Special levy of selected financial institutions	29	-	(15 539)
Salaries and employee benefits	30	(29 338)	(29 947)
Other administrative expenses	31	(16 737)	(19 250)
Amortisation	15	(4 142)	(3 494)
Depreciation	16	(3 357)	(3 275)
Profit before provisions, impairment and tax		49 380	32 208
Net modification losses		(41)	-
Provisions	19, 32	(7)	116
Impairment losses	21, 33	(8 455)	(21 060)
Net loss arising from the derecognition of financial assets at amortised cost	33	(1 016)	373
Profit before tax		39 861	11 637
Income tax expense	34	(8 899)	(2 574)
			9 063
NET PROFIT FOR THE SIX MONTHS		30 962	9 063
Other comprehensive income for the three months, after tax:	35, 36		
Items that shall not be reclassified to profit or loss in the future:			
Change in value of financial assets at fair value through other comprehensive income (equity instruments)		568	1 610
		460	1 610
Items that may be reclassified to profit or loss in the future:			
Change in value of financial assets at fair value through other comprehensive income (debt instruments)		348	15 280
Exchange difference on translation of foreign operations		8	28
		356	15 308
Other comprehensive income for the three months, net of tax		924	16 918
TOTAL COMPREHENSIVE INCOME FOR THE SIX MONTHS		31 886	25 981
Basic and diluted earnings per € 33.2 share in €		2,39	0,70

The accompanying notes on pages 8 to 153 form an integral part of these financial statements.

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Separate statement of changes in equity for the six months ended 30 June 2021
(In thousands of euro)

	Share capital	Share premium	Legal reserve fund	Retained earnings	Buildings and land	Financial assets at FVOCI	Translation of foreign operation	Total
As at 1 January 2021	430 819	13 719	87 493	1 134 224	17 297	9 673	21	1 693 246
Total comprehensive income for the six months, net of tax	-	-	-	57 665	-	(4 885)	(22)	52 758
Gain on disposal of property and equipment	-	-	-	1	(1)	-	-	-
Losses on the sale of shares at FVOCI	-	-	-	(110)	-	110	-	-
Exchange difference	-	-	-	1	-	-	-	1
Transactions with owners, recorded directly in equity								
Reversal of dividends distributed but not collected	-	-	-	269	-	-	-	269
As at 30 June 2021	430 819	13 719	87 493	1 192 050	17 296	4 898	(1)	1 746 274
1. január 2020	430 819	13 719	87 493	1 043 673	14 073	6 832	330	1 596 939
Total comprehensive income for the six months, net of tax	-	-	-	23 052	99	(2 973)	(360)	19 818
Gain on disposal of property and equipment	-	-	-	472	(472)	-	-	-
Losses on the sale of shares at FVOCI	-	-	-	(254)	-	254		
Exchange difference	-	-	-	374	-	-	-	374
Transactions with owners, recorded directly in equity								
Reversal of dividends distributed but not collected	-	-	-	*196*	-	-	-	*196*
As at 30 June 2020	430 819	13 719	87 493	1 067 513	13 700	4 113	(30)	1 617 327

The accompanying notes on pages 8 to 153 form an integral part of these financial statements.

VÚB BANKA

Separate statement of cash for the six months ended 30 June 2021
(In thousands of euro)

	Note	June 2021	June 2020
Cash flows from operating activities:			
Profit before tax		74 613	29 778
Adjustments for:			
Interest income	24	(146 324)	(160 682)
Interest expense	24	14 714	20 115
Dividend income		(3 002)	(4 001)
Loss/(gain) from sale/revaluation of financial assets at fair value through other comprehensive income		26 560	(17 035)
Loss on sale of intangible assets and property and equipment	28	10	99
(Gain)/loss from revaluation of debt securities in issue		(28 238)	34 795
Amortisation	15	8 002	6 856
Depreciation	14	6 730	6 523
Impairment losses and similar charges	32, 33	16 277	42 216
Exchange difference on translation of foreign operations	35, 36	248	14
Interest received		147 806	160 913
Interest paid		(12 054)	(19 708)
Tax paid		476	(26 175)
Increase in financial assets at fair value through profit or loss		(117 436)	(125 850)
Decrease/(increase) in derivatives – hedge accounting (assets)		29 302	(33 323)
Financial assets at amortised cost:			
Decrease/(increase) in due from other banks		8 409	(7 929)
(Increase) in due from customers		(675 027)	(84 253)
Decrease/(increase) in fair value changes of the hedged items in portfolio hedge of interest rate risk (assets)		7 881	(7 493)
Decrease in other assets		11 124	5 535
(Decrease)/increase in financial liabilities at fair value through profit or loss		(6 295)	7 982
(Decrease)/increase in derivatives – hedge accounting (liabilities)		(30 310)	22 975
Financial liabilities measured at amortised cost:			
Increase/(decrease) in due to banks		1 063 822	(119 009)
(Decrease)/increase in due to customers		(216 799)	291 798
(Decrease)/increase in fair value changes of the hedged items in portfolio hedge of interest rate risk (liabilities)		(1 861)	2 220
Increase in provisions		825	424
Increase/(decrease) in other liabilities		360	(17 068)
Net cash from/(used in) operating activities		179 813	9 717
Cash flows from investing activities:			
Purchase of financial assets at fair value through other comprehensive income		(547 514)	(894 033)
Disposal of financial assets at fair value through other comprehensive income		419 835	337 450
Repayments of financial assets at fair value through other comprehensive income		375 000	310 000
Purchase of intangible assets and property and equipment		(9 374)	(15 265)
Disposal of intangible assets and property and equipment		16	645
Dividends received		-	4 001
Net cash from/(used in) investing activities		237 963	(257 202)

(Table continues on the next page)

The accompanying notes on pages 8 to 153 form an integral part of these financial statements.

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Separate statement of cash flows for the six months ended 30 June 2021
(In thousands of euro)
(continued)

	Note	June 2021	June 2020
Cash flows from financing activities:			
Proceeds from issue of debt securities		500 000	500 000
Repayments of debt securities in issue		(47 597)	(152 539)
Repayments of loans received from other banks		(6 486)	-
Proceeds from lease liabilities		-	4 204
Repayments of lease liabilities		(913)	(4 114)
Net cash from financing activities		445 004	347 551
Net change in cash and cash equivalents		862 780	100 066
Cash and cash equivalents as at the beginning of the period	7	1 571 629	996 438
Cash and cash equivalents as at 30 June	7	2 434 409	1 096 504

The accompanying notes on pages 8 to 153 form an integral part of these financial statements.

1. Basis of preparation

1.1. Reporting entity - general information

Všeobecná úverová banka, a. s. ('the Bank' or 'VUB') provides retail and commercial banking services. The Bank is domiciled in the Slovak Republic with its registered office at Mlynské nivy 1, 829 90 Bratislava 25 and has the identification number (IČO) 313 20 155 and the tax identification number (DIČ) 2020411811.

As at 30 June 2021, the Bank had a network of 181 points of sale (including Retail Branches, Corporate Branches and Mortgage centres) located throughout Slovakia (31 December 2020: 197). The Bank also has one branch in the Czech Republic (31 December 2020: 1).

The Bank's ultimate parent company is Intesa Sanpaolo S.p.A. ('ISP' or 'the Parent Company'), which is a joint-stock company and which is incorporated and domiciled in Italy. The consolidated financial statements of the company are available at the address of its registered office at Piazza San Carlo 156, 10121 Torino, Italy.

As at 30 June 2021, the members of the Management Board are Alexander Resch (Chairman), Marie Kovářová, Peter Magala, Martin Techman, Roberto Vercelli, Andrej Viceník and Paolo Vivona.

As at 30 June 2021, the members of the Supervisory Board are Ignacio Jaquotot (Chairman), Elena Kohútiková (Vice Chairman), Marco Fabris, Peter Gutten, Luca Leoncini Bartoli, Christian Schaack and Róbert Szabo.

1.2. Basis of accounting

The interim separate financial statements of the Bank ('the financial statements') have been prepared in accordance with International Accounting Standard IAS 34 Interim Financial Reporting.

The financial statements have been prepared under the historical cost convention, as modified by the revaluation of financial assets and financial liabilities at fair value though profit or loss, financial assets at fair value through other comprehensive income, derivatives – hedge accounting, buildings and land in property and equipment under revaluation model to fair value and in the case of the financial assets or financial liabilities designated as hedged items in qualifying fair value hedge relationships modified by the changes in fair value attributable to the risk being hedged.

The financial statements were prepared using the going concern assumption that the Bank will continue in operation for the foreseeable future.

1.3. Functional and presentation currency

The financial statements are presented in thousands of euro ('€'), unless indicated otherwise. Euro is the functional currency of the Bank.

Negative balances are presented in brackets.

1.4. Use of judgements and estimates

In preparing the financial statements, management has made judgements, estimates and assumptions that affect the application of the Bank's accounting policies and the reported amounts of assets, liabilities, income and expenses. Actual results may differ from these estimates.

Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to estimates are recognised prospectively.

1. Basis of preparation (continued)

1.4.1. Judgements

Information about judgements made in applying accounting policies that have the most significant effects on the amounts recognised in the financial statements is included in the following notes. The most significant judgements relate to the classification of financial instruments.

- Classification of financial instruments: assessment of the business model within which the assets are held and assessment of whether the contractual terms of the financial asset are solely payments of principal and interest ('SPPI') on the principal amount outstanding. (note 3.4.2)

- Establishing the criteria for determining whether credit risk on the financial asset has increased significantly since initial recognition, determining methodology for incorporating forward-looking information into measurement of expected credit loss ('ECL') and selection and approval of models used to measure ECL. (note 4.1.2)

- Valuation of lease liabilities (note 11.5) and right-of-use assets (note 14)
  The application of International Financial Reporting Standard 16 Leases ('IFRS 16') requires the Bank to make judgments that affect the valuation of the lease liabilities and the valuation of right-of-use assets (note 3.16). These include: determining contracts in scope of IFRS 16, determining the contract term and determining the interest rate used for discounting of future cash flows.

  The lease term determined by the Bank generally comprises non-cancellable period of lease contracts, periods covered by an option to extend the lease if the Bank is reasonably certain to exercise that option and periods covered by an option to terminate the lease if the Bank is reasonably certain not to exercise that option. The same term is applied as economic useful life of right-of-use assets.

  For contracts relating to branch and office premises, the Bank has concluded that there are a number of scenarios where the Bank might elect not to exercise the extension options. Therefore, the IFRS 16 criterion of being reasonably certain to exercise the extension options is not fulfilled. The periods covered by a potential use of an option to extend the lease were excluded from the lease term.

  For leases of branch and office premises with indefinite term the Bank generally estimates the length of the contract to be five years. The Bank monitors these assumptions, reviews the industry practice and the evolution of the accounting interpretations in relation to the estimation of the lease terms among peer financial entities and is prepared to make adjustments, if necessary.

  The present value of the lease payment is determined using the discount rate representing the rate of interest rate swap applicable for currency of the lease contract and for similar tenor, corrected by the average credit spread of entities with rating similar to the Bank's rating, observed in the period when the lease contract commences or is modified.

1. Basis of preparation (continued)

1.4.2. Assumptions and estimation uncertainties

Estimates are used for, but not limited to: fair values of financial instruments, fair value of buildings and land under the revaluation model, impairment losses on due from other banks and due from customers and impairment losses related to financial assets at fair value through other comprehensive income, provisions for off-balance sheet risks, useful lives and residual values of tangible and intangible assets, impairment losses on tangible and intangible assets, valuation of lease liabilities and right-of-use assets, liabilities from employee benefits, provisions for legal claims and deferred tax assets.

Information about assumptions and estimation uncertainties that have a significant risk of resulting in a material adjustment is included in the following notes.

- Determination of the fair value of financial instruments with significant unobservable inputs. (note 5)
  Where the fair values of financial assets and financial liabilities recorded on the statement of financial position cannot be derived from active markets, they are determined using a variety of valuation techniques which include the use of mathematical models. The inputs to these models is taken from observable markets where possible, but where this is not feasible, a degree of judgement is required in establishing fair values. The judgements include considerations of liquidity and model inputs such as correlation and volatility for longer dated financial instruments.

- Impairment of financial instruments: determining inputs into the ECL measurement model, including incorporation of forward-looking information. (note 4.1.2)
  The Bank reviews its loans and advances at each reporting date to assess whether any individually assessed impairment loss should be recorded in the statement of profit or loss. In particular, judgement by management is required in the estimation of the amount and timing of future cash flows when determining the level of impairment loss required. Such estimates are based on assumptions about a number of factors and actual results may differ, resulting in future changes to the individually assessed impairment losses.

- Recognition and measurement of legal claims: key assumptions about the likelihood and magnitude of an outflow of resources.

- Recognition of deferred tax assets: availability of future taxable profit against which deferred tax assets can be used.

- Impairment testing for cash generating units containing goodwill: key assumptions underlying recoverable amounts.

2. Changes in accounting policies

A number of the new standards are also effective from 1 January 2021 but they do not have a material effect on the financial statements.

The Bank has consistently applied the accounting policies as set out in Note 3 to all periods presented in the financial statements.

3. Significant accounting policies

3.1. Foreign currency transactions

Transactions in foreign currencies are translated into the euro at the official European Central Bank ('ECB') spot exchange rate at the date of the transactions.

Monetary assets and liabilities denominated in foreign currencies are translated into euro at the official ECB spot exchange rate at the reporting date. The foreign currency gain or loss on monetary items is the difference between the amortised cost in the functional currency at the beginning of the year, adjusted for effective interest and payments during the year, and the amortised cost in the foreign currency translated at the spot exchange rate at the end of the year.

Non-monetary assets and liabilities that are measured at fair value in a foreign currency are translated into euro at the official ECB spot exchange rate at the date on which the fair value is determined. Non-monetary items that are measured based on historical cost in a foreign currency are translated using the official ECB spot exchange rate at the date of the transaction.

The foreign currency gain or loss is the difference between the contractual exchange rate of a transaction and the official ECB exchange rate at the date of the transaction. Foreign currency gain or loss is included in 'Net trading result', as well as gains or losses arising from movements in exchange rates after the date of the transaction.

Foreign currency differences arising on translation are generally recognised in profit or loss. However, foreign currency differences arising from the translation of the following items are recognised in other comprehensive income ('OCI'):

- qualifying cash flow hedges to the extent that the hedge is effective; and
- equity investments in respect of which an election has been made to present subsequent changes in fair value in OCI.

3.2. Foreign operations

The financial statements include foreign operations in the Czech Republic. The assets and liabilities of foreign operations are translated into euro at the spot exchange rate at the reporting date. The income and expenses of foreign operations are translated to euro at rates approximating the foreign exchange rates at the dates of the transactions.

Foreign currency differences arising on these translations are recognised in OCI, and accumulated in the foreign currency translation reserve ('Translation of foreign operation' reserve).

3.3. Cash and cash equivalents

'Cash and cash equivalents' include notes and coins on hand, balances held with central banks, including compulsory minimum reserves, and highly liquid financial assets with original maturities of three months or less from the date of acquisition that are subject to an insignificant risk of changes in their fair value, and are used by the Bank in the management of its short-term commitments.

'Cash and cash equivalents' are carried at amortised cost in the statement of financial position (note 7).

3. Significant accounting policies (continued)

3.4. Financial assets and financial liabilities

3.4.1. Recognition and initial measurement

The Bank initially recognises loans and advances (e.g. 'Due from other banks', 'Due from customers'), deposits (e.g. 'Due to banks', 'Due to customers'), debt securities issued and subordinated debt on the date on which they are originated. All other financial instruments (including regular-way purchases and sales of financial assets) are recognised on the trade date, which is the date on which the Bank becomes a party to the contractual provisions of the instrument.

A financial asset or financial liability is measured initially at fair value plus, for an item not at fair value through profit or loss, transaction costs that are directly attributable to its acquisition or issue.

3.4.2. Classification

On initial recognition, a financial asset is classified as measured at:

- Amortised cost ('AC'),
- Fair value through other comprehensive income ('FVOCI'), or
- Fair value through profit or loss ('FVTPL').

A financial asset is measured at AC, if it meets both of the following conditions and is not designated as at FVTPL:

- The asset is held within a business model whose objective is to hold assets to collect contractual cash flows; and
- The contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI.

A debt instrument is measured at FVOCI only if it meets both of the following conditions and is not designated as at FVTPL:

- The asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets; and
- The contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI.

On initial recognition of an equity investment that is not held for trading, the Bank may irrevocably elect to present subsequent changes in fair value in OCI (note 3.6.2). This election is made on an investment-by-investment basis.

All other financial assets are classified as measured at FVTPL.

In addition, on initial recognition, the Bank may irrevocably designate a financial asset that otherwise meets the requirements to be measured at amortised cost or at FVOCI as at FVTPL if doing so eliminates or significantly reduces an accounting mismatch that would otherwise arise (note 3.4.7).

3. Significant accounting policies (continued)

Business model assessment

The Bank uses the following business models:

- Held to collect,
- Held to collect and sell,
- Held for trading/Other.

The Bank makes an assessment of the objective of a business model in which an asset is held at a portfolio level because this best reflects the way the business is managed and information is provided to management. The information considered includes:

- The stated policies and objectives for the portfolio and the operation of those policies in practice. In particular, whether management's strategy focuses on earning contractual interest revenue, maintaining a particular interest rate profile, matching the duration of the financial assets to the duration of the liabilities that are funding those assets or realising cash flows through the sale of the assets;
- How the performance of the portfolio is evaluated and reported to the Bank's management;
- The risks that affect the performance of the business model (and the financial assets held within that business model) and its strategy for how those risks are managed;
- How managers of the business are compensated (e.g. whether compensation is based on the fair value of the assets managed or the contractual cash flows collected); and
- The frequency, volume and timing of sales, in prior periods, the reasons for such sales and its expectations about future sales activity. However, information about sales activity is not considered in isolation, but as part of an overall assessment of how the Bank states objective for managing the financial assets is achieved and how cash flows are realised.

Financial assets that are held for trading or managed and whose performance is evaluated on a fair value basis are measured at FVTPL because they are neither held to collect contractual cash flows nor held both to collect contractual cash flows and to sell financial assets.

Assessment of whether contractual cash flows are SPPI

For the purposes of this assessment, 'principal' is defined as the fair value of the financial asset on initial recognition. 'Interest' is defined as consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs (e.g. liquidity risk and administrative costs), as well as profit margin.

In assessing whether the contractual cash flows are SPPI, the Bank considers the contractual terms of the instrument. This includes assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition. In making the assessment, the Bank considers:

- Contingent events that would change the amount and timing of cash flows;
- Leverage features;
- Prepayment and extension terms;
- Terms that limit the Bank's claim to cash flows from specified assets (e.g. non-recourse loans); and
- Features that modify consideration of the time value of money (e.g. periodical reset of interest rates).

The Bank holds a portfolio of long-term fixed-rate loans for which the Bank has the option to propose to revise the interest rate at periodic reset dates. These reset rights are limited to the market rate at the time of revision. The borrowers have an option to either accept the revised rate or redeem the loan at par without penalty. The Bank has determined that the contractual cash flows of these loans are SPPI because the option varies the interest rate in a way that is consideration for the time value of money, credit risk, other basic lending risks and costs associated with the principal amount outstanding.

The Bank classifies its financial liabilities, other than financial guarantees and loan commitments, as measured at amortised cost or FVTPL.

Reclassifications

Financial assets are not reclassified subsequent to their initial recognition, except in the period after the Bank changes its business model for managing financial assets. Financial liabilities are never reclassified.

3. Significant accounting policies (continued)

3.4.3. Subsequent measurement

After initial recognition, the Bank measures financial assets and financial liabilities in accordance to the classification at fair value through profit or loss (note 3.5), fair value through other comprehensive income (note 3.6) or at amortised cost (note 3.7).

3.4.4. Derecognition

Derecognition due to substantial modification of terms and conditions

The Bank derecognises a financial asset, such as a loan to a customer, when the terms and conditions have been renegotiated to the extent that, substantially, it becomes a new loan, with the difference recognised as a derecognition gain or loss, to the extent that an impairment loss has not already been recorded. When assessing whether or not to derecognise a loan to a customer, amongst others, the Bank considers the factors such as change in currency of the loan, introduction of an equity feature, change in counterparty, whether the modification is such that the instrument would no longer meet the SPPI criterion.

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 an exchange or modification is treated as a derecognition of the original liability and the recognition of a new liability. The difference between the carrying value of the original financial liability and the consideration paid is recognised in profit or loss.

Derecognition other than due to substantial modification

The Bank derecognises a financial asset when the contractual rights to the cash flows from the financial asset expire, or it transfers the rights to receive the contractual cash flows in a transaction in which substantially all of the risks and rewards of ownership of the financial asset are transferred or in which the Bank neither transfers nor retains substantially all of the risks and rewards of ownership and it does not retain control of the financial asset.

On derecognition of a financial asset, the difference between the carrying amount of the asset (or the carrying amount allocated to the portion of the asset derecognised) and the sum of (i) the consideration received (including any new asset obtained less any new liability assumed) and (ii) any cumulative gain or loss that had been recognised in OCI is recognised in profit or loss.

Any cumulative gain or loss recognised in OCI in respect of equity investment securities designated as at FVOCI is not recognised in profit or loss on derecognition of such securities, as explained above. Any interest in transferred financial assets that qualify for derecognition that is created or retained by the Bank is recognised as a separate asset or liability.

The Bank enters into transactions whereby it transfers assets recognised on its statement of financial position, but retains either all or substantially all of the risks and rewards of the transferred assets or a portion of them. In such cases, the transferred assets are not derecognised. Examples of such transactions are securities lending and sale-and-repurchase transactions. (note 3.8)

In transactions in which the Bank neither retains nor transfers substantially all of the risks and rewards of ownership of a financial asset and it retains control over the asset, the Bank continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.

The Bank derecognises a financial liability when its contractual obligations are discharged or cancelled, or expire.

3. Significant accounting policies (continued)

3.4.5. Modifications

If the terms of a financial asset are modified, then the Bank evaluates whether the cash flows of the modified asset are substantially different.

If the cash flows are substantially different, then the contractual rights to cash flows from the original financial asset are deemed to have expired. In this case, the original financial asset is derecognised (see above under Derecognition other than due to substantial modification) and a new financial asset is recognised at fair value plus any eligible transaction costs. Any fees received as part of the modification are accounted for as follows:

- Fees that are considered in determining the fair value of the new asset and fees that represent reimbursement of eligible transaction costs are included in the initial measurement of the asset;
- Other fees are included in profit or loss as part of the gain or loss on derecognition.

If cash flows are modified when the borrower is in financial difficulties, then the objective of the modification is usually to maximise recovery of the original contractual terms rather than to originate a new asset with substantially different terms. If the Bank plans to modify a financial asset in a way that would result in forgiveness of cash flows, then it first considers whether a portion of the asset should be written off before the modification takes place (see below for write-off policy, note 4.1.5). This approach impacts the result of the quantitative evaluation and means that the derecognition criteria are not usually met in such cases.

If the modification of a financial asset measured at amortised cost or FVOCI does not result in derecognition of the financial asset, then the Bank first recalculates the gross carrying amount of the financial asset using the original effective interest rate of the asset and recognises the resulting adjustment as a modification gain or loss in profit or loss. For floating-rate as well as fixed-rate financial assets, the original effective interest rate used to calculate the modification gain or loss is adjusted to reflect current market terms at the time of the modification. Any costs or fees incurred and fees received as part of the modification adjust the gross carrying amount of the modified financial asset and are amortised over the remaining term of the modified financial asset.

If such a modification is carried out because of financial difficulties of the borrower (note 4.1.2), then the gain or loss is presented together with impairment losses.

3.4.6. Offsetting

Financial assets and financial liabilities are offset and the net amount presented in the statement of financial position when, and only when, the Bank currently has a legally enforceable right to set off the amounts and it intends either to settle them on a net basis or to realise the asset and settle the liability simultaneously.

Income and expenses are presented on a net basis only when permitted under IFRS, or for gains and losses arising from a group of similar transactions such as in the Bank's trading activity.

3.4.7. Fair value measurement

'Fair value' is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal or, in its absence, the most advantageous market to which the Bank has access at that date. The fair value of a liability reflects its non-performance risk.

When one is available, the Bank measures the fair value of an instrument using the quoted price in an active market for that instrument. A market is regarded as 'active' if transactions for the asset or liability take place with sufficient frequency and volume to provide pricing information on an ongoing basis.

If there is no quoted price in an active market, then the Bank uses valuation techniques that maximise the use of relevant observable inputs and minimise the use of unobservable inputs. The chosen valuation technique incorporates all of the factors that market participants would take into account in pricing a transaction.

The best evidence of the fair value of a financial instrument on initial recognition is normally the transaction price, i.e. the fair value of the consideration given or received.

3. Significant accounting policies (continued)

If the Bank determines that the fair value on initial recognition differs from the transaction price and the fair value is evidenced neither by a quoted price in an active market for an identical asset or liability nor based on a valuation technique for which any unobservable inputs are judged to be insignificant in relation to the measurement, then the financial instrument is initially measured at fair value, adjusted to defer the difference between the fair value on initial recognition and the transaction price. Subsequently, that difference is recognised in profit or loss on an appropriate basis over the life of the instrument but no later than when the valuation is wholly supported by observable market data or the transaction is closed out.

3.5. Financial assets and financial liabilities at fair value through profit or loss

Financial assets and financial liabilities at fair value through profit or loss comprise financial assets held for trading, including derivative financial instruments and financial assets at fair value through profit or loss.

3.5.1. Financial assets and financial liabilities held for trading

The Bank classifies trading portfolio as financial assets or financial liabilities measured at fair value through profit or loss when they have been purchased or issued primarily for short-term profit making through trading activities or form part of a portfolio of financial instruments that are managed together, for which there is evidence of a recent pattern of short-term profit taking. Financial assets and financial liabilities held for trading are recorded and measured in the statement of financial position at fair value. Changes in fair value are recorded in profit or loss with the exception of movements in fair value of liabilities designated at FVTPL due to changes in the Bank's own credit risk. Such changes in fair value are recorded in the 'Fair value gains and losses arising from the Bank's own credit risk related to derivative liabilities' and do not get recycled to the profit or loss. Interest earned or incurred on instruments designated at FVTPL is presented in 'Other interest income'. Dividend income from equity instruments measured at FVTPL is considered to be incidental to the Bank's trading operations and is recorded in profit or loss as 'Net trading result' when the right to the payment has been established.

Included in this classification are debt securities, equities, short positions and customer loans that have been acquired principally for the purpose of selling in the near term.

The Bank monitors changes in fair values on a daily basis and recognises unrealised gains and losses in the statement of profit or loss in 'Net trading result'.

3. Significant accounting policies (continued)

Derivative financial instruments

In the normal course of business, the Bank is a party to contracts with derivative financial instruments, which represent a very low initial investment compared to the notional value of the contract. The derivative financial instruments used include forward rate agreements, foreign exchange and commodity forwards, interest rate, foreign exchange and commodity swaps, interest rate, foreign exchange, equity options, cross currency swaps and futures. The Bank also uses financial instruments to hedge interest rate risk and currency exposures associated with its transactions in the financial markets. They are accounted for as trading derivatives if they do not fully comply with the definition of a hedging derivative as prescribed by IFRS. The Bank also acts as an intermediary provider of these instruments to certain customers.

Derivative financial instruments not used for hedge accounting purposes are initially recognised and subsequently re-measured in the statement of financial position at fair value as part of 'Financial assets held for trading'.

All derivatives are carried as assets when the fair value is positive and as liabilities when the fair value is negative. Changes in the fair value of derivatives are included in 'Net trading result'.

Fair values are obtained from quoted market prices. If such values are not available, discounted cash flow models and option pricing models are used. The fair values of derivative positions are computed using standard formulas and prevailing interest rates applicable for respective currencies available on the market at reporting dates.

Embedded derivatives

An embedded derivative is a component of a hybrid (combined) instrument that also includes a non-derivative host contract with the effect that some of the cash flows of the combined instrument vary in a way similar to a stand-alone derivative. An embedded derivative causes some or all of the cash flows that otherwise would be required by the contract to be modified according to a specified interest rate, financial instrument price, commodity price, foreign exchange rate, index of prices or rates, credit rating or credit index, or other variable, provided that, in the case of a non-financial variable, it is not specific to a party to the contract. A derivative that is attached to a financial instrument, but is contractually transferable independently of that instrument, or has a different counterparty from that instrument, is not an embedded derivative, but a separate financial instrument.

The Bank assesses whether any embedded derivatives contained in a given contract are required to be separated from the host contract and accounted for as derivatives.

Derivatives may be embedded in another contractual arrangement (a host contract). The Bank accounts for an embedded derivative separately from the host contract when:

- the host contract is not an asset in the scope of International Financial Reporting Standard 9 Financial Instruments ('IFRS 9');
- the host contract is not itself carried at FVTPL;
- the terms of the embedded derivative would meet the definition of a derivative if they were contained in a separate contract; and
- the economic characteristics and risks of the embedded derivative are not closely related to the economic characteristics and risks of the host contract.

Separated embedded derivatives are measured at fair value, with all changes in fair value recognised in profit or loss in net trading result unless they form part of a qualifying cash flow hedging relationship. Separated embedded derivatives are presented in the statement of financial position together with other derivatives.

3.5.2. Financial assets at fair value through profit or loss

Financial assets in this category are those that are not held for trading and are required to be measured at fair value under IFRS 9, as they do not meet the requirements of the SPPI test.

Financial assets at fair value also comprises equity instruments not held for trading where the Bank did not elect the option to classify investments at FVOCI. Financial assets at fair value through profit or loss are recorded in the statement of financial position at fair value. Changes in fair value are recognised in 'Net trading result'. Interest income is recorded in 'Other interest income' and dividend income in 'Net trading result' according to the terms of the contract, or when the right to payment has been established.

3. Significant accounting policies (continued)

3.6. Financial assets at fair value through other comprehensive income

3.6.1. Debt instruments measured at fair value through other comprehensive income

The Bank applies the new category under IFRS 9 of debt instruments measured at FVOCI when both of the following conditions are met:

- The instrument is held within a business model, the objective of which is achieved by both collecting contractual cash flows and selling financial assets.
- The contractual terms of the financial asset meet the SPPI test.

Debt instruments at FVOCI are subsequently measured at fair value with gains and losses arising due to changes in fair value recognised in equity. Interest income and foreign exchange gains and losses are recognised in profit or loss in the same manner as for financial assets at amortised cost. The Bank applies the impairment requirements for the recognition and measurement of a loss allowance for financial assets that are measured at fair value through other comprehensive income. However, the loss allowance is recognised in other comprehensive income and does not reduce the carrying amount of the financial asset in the statement of financial position.

Where the Bank holds more than one investment in the same security, they are deemed to be disposed of on a first–in first–out basis. On derecognition, cumulative gains or losses previously recognised in equity are reclassified from equity to profit or loss.

The fair value of debt instruments, for which an active market exists, and a market value can be estimated reliably, is measured at quoted market prices. In circumstances where the quoted market prices are not readily available, the fair value is estimated using the present value of future cash flows.

In the case of debt instruments measured at fair value through other comprehensive income, impairment is assessed based on the same criteria as financial assets carried at amortised cost. If, in a subsequent year, the fair value of a debt instrument increases and the increase can be objectively related to an event occurring after the impairment loss was recognised in 'Impairment losses' in the statement of profit or loss and other comprehensive income, the impairment loss is reversed through the statement of profit or loss.

3.6.2. Equity instruments measured at fair value through other comprehensive income

Upon initial recognition, the Bank occasionally elects to classify irrevocably some of its equity investments as equity instruments at FVOCI when they meet the definition of Equity under IAS 32 Financial Instruments: Presentation and are not held for trading. Such classification is determined on an instrument-by-instrument basis.

Gains and losses on these equity instruments are never recycled to profit or loss. Dividends are recognised in profit or loss as 'Net trading result' when the right to the payment has been established, except when the Bank benefits from such proceeds as a recovery of part of the cost of the instrument, in which case, such gains are recorded in OCI. Equity instruments at FVOCI are not subject to any impairment assessment.

3.7. Financial assets and financial liabilities at amortised costs

Financial assets at amortised costs comprise balances due from other banks and due from customers including debt securities. Financial liabilities at amortised costs comprise balances due to banks, due to customers, subordinated debt and debt securities in issue.

3.7.1. Financial assets at amortised costs: Due from other banks and Due from customers

The Bank only measures 'Due from other banks' and 'Due from customers' at amortised cost if both of the following conditions are met:

- The financial asset is held within a business model with the objective to hold financial assets in order to collect contractual cash flows
- 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 principal amount outstanding.

3. Significant accounting policies (continued)

Due from other banks

Due from other banks include receivables from current accounts in other than central banks, term deposits, loans provided and securities purchased from commercial banks. Balances are presented at amortised cost including interest accruals less any impairment losses.

Due from customers

Due from customers balances comprise loans and advances and securities with fixed or determinable payments and fixed maturities. These receivables are recorded at amortised cost less any impairment losses. (note 12.2)

Impairment

The detailed description of policy is in the note 4.1.2.

The Bank writes off 'Due from other banks' and 'Due from customers' when it determines that the loans and advances are uncollectible. Loans and advances are written off against the Impairment losses on Financial Assets in amortised cost with the remaining part being written-off against profit or loss reported under 'Net loss arising from the derecognition of financial assets at amortised cost'. Any recoveries of written off loans are credited to the same line in the statement of profit or loss on receipt.

3.7.2. Financial liabilities at amortised costs: Due to banks, Due to customers, Subordinated debt and Debt securities in issue

Deposits, debt securities issued and subordinated liabilities are the Bank's sources of debt funding.

The Bank classifies capital instruments as financial liabilities or equity instruments in accordance with the substance of the contractual terms of the instruments.

Deposits, debt securities issued and subordinated liabilities are initially measured at fair value minus incremental direct transaction costs, and subsequently measured at their amortised cost using the effective interest rate method.

Due to customers covers also lease liabilities (note 3.16).

3.8. Repurchase and reverse repurchase agreements

Securities sold under sale and repurchase agreements ('repo transactions') remain as assets in the statement of financial position under the original caption and the liability from the received loan is included in 'Financial assets at amortised cost: Due to banks' or 'Financial assets at amortised cost: Due to customers'.

Securities purchased under agreements to purchase and resell ('reverse repo transactions') are recorded only in the off-balance sheet and the loan provided is reported in the statement of financial position in 'Cash, cash balances at central banks', 'Financial assets at amortised cost: Due from other banks' or 'Financial assets at amortised cost: Due from customers', as appropriate.

The price differential between the purchase and sale price of securities is treated as interest income or expense and deferred over the life of the agreement.

3. Significant accounting policies (continued)

3.9. Derivatives – Hedge accounting

When initially applying IFRS 9, the Bank has elected to continue to apply the requirements of IAS 39 instead of those of IFRS 9.

Derivatives held for risk management purposes include all derivative assets and liabilities that are not classified as trading assets or liabilities. Derivatives held for risk management purposes are measured at fair value in the statement of financial position in 'Derivatives – Hedge accounting'.

The Bank makes use of derivative instruments to manage exposures to interest rate risks, foreign currency risk, inflation risk and credit risk including exposures arising from highly probable transactions. In order to manage individual risks, the Bank applies hedge accounting for transactions which meet the specified criteria.

At the inception of the hedge relationship, the Bank formally documents the relationship between the hedged item and the hedging instrument, including the nature of the risk, the objective and strategy for undertaking the hedge and the method that will be used to assess the effectiveness of the hedging relationship.

Also, at the inception of the hedge relationship, a formal assessment is undertaken to ensure the hedging instrument is expected to be highly effective in offsetting the designated risk in the hedged item. Hedges are formally assessed each month. A hedge is regarded as highly effective if the changes in fair value or cash flows attributable to the hedged risk during the period for which the hedge is designated are expected to offset in a range of 80% to 125%.

In situations where that hedged item is an expected transaction, the Bank assesses whether the transaction is highly probable and presents an exposure to variations in cash flows that could ultimately affect the statement of profit or loss.

Cash flow hedges

For designated and qualifying cash flow hedges, the effective portion of the gain or loss on the hedging instrument is initially recognised in other comprehensive income as 'Cash flow hedges'. The ineffective portion of the gain or loss on the hedging instrument is recognised immediately as gain or loss in the statement of profit or loss in 'Net trading result'.

When the hedged cash flow affects profit or loss, the gain or loss on the hedging instrument is reclassified from other comprehensive income to profit or loss as a reclassification adjustment in 'Net trading result'. When a hedging instrument expires, or is sold, terminated, exercised, or when a hedge no longer meets the criteria for hedge accounting, any cumulative gain or loss that has been recognised in other comprehensive income remains separately in equity and is reclassified from other comprehensive income to statement of profit or loss as a reclassification adjustment when the hedged expected transaction is ultimately recognised. When an expected transaction is no longer expected to occur, the cumulative gain or loss that was reported in equity is immediately reclassified from other comprehensive income to statement of profit or loss as a reclassification adjustment.

Fair value hedges

For designated and qualifying fair value hedges, the change in the fair value of a hedging derivative is recognised in the statement of profit or loss in 'Net trading result'. Meanwhile, the change in the fair value of the hedged item attributable to the risk hedged is recorded as part of the carrying value of the hedged item and is also recognised in the statement of profit or loss in 'Net trading result'.

In case of macro hedge, the change in the fair value of the hedged items attributable to the risk hedged is presented separately as 'Fair value changes of the hedged items in portfolio hedge of interest rate risk'

If the hedging instrument expires or is sold, terminated or exercised, or where the hedge no longer meets the criteria for hedge accounting, the hedge relationship is terminated. For hedged items recorded at amortised cost, the difference between the carrying value of the hedged item on termination and the face value is amortised over the remaining term of the original hedge using the effective interest rate ('EIR'). If the hedged item is derecognised, the unamortised fair value adjustment is recognised immediately in profit or loss when the item is derecognised.

3. Significant accounting policies (continued)

Specific policies for hedges affected by IBOR reform

The Phase 1 amendments

If a hedging relationship is directly affected by IBOR reform, then the Bank applies certain exceptions (referred to as 'the Phase 1 amendments') to the general hedge accounting policy. The Bank considers that a hedging relationship is directly affected by IBOR reform if it is subject to the following uncertainty arising from the reform:

- an interest rate benchmark subject to the reform is designated as the hedged risk, regardless of whether the rate is contractually specified; and/or
- the timing or amounts of interest rate benchmark-based cash flows of the hedged item or of the hedging instrument are uncertain.

The Phase 1 amendments to the Bank's policies are as follows.

- For the purpose of evaluating whether the hedging relationship is expected to be highly effective (i.e. prospective effectiveness assessment), the Bank assumes that the benchmark interest rate is not altered as a result of IBOR reform.
- If the Bank concludes that the actual result of a hedging relationship is outside the range of 80 – 125% (i.e. retrospective assessment), then the Bank determines whether the hedging relationship continues to qualify for hedge accounting or whether it needs to be discontinued. This includes, for example, determining that the hedge is expected to be highly effective prospectively and that the effectiveness of the hedging relationship can be reliably measured.
- For a hedge of a non-contractually specified benchmark portion of interest rate risk, the Bank applies the requirement that the designated portion needs to be a separately identifiable component only at the inception of the hedging relationship.
- For a cash flow hedge of a forecast transaction, the Bank assumes that the benchmark interest rate will not be not altered as a result of IBOR reform for the purpose of asserting that the forecast transaction is highly probable and presents an exposure to variations in cash flows that could ultimately affect profit or loss.
- In determining whether a previously designated forecast transaction is no longer expected to occur, the Bank assumes that the hedged interest rate benchmark cash flows will not be altered as a result of IBOR reform.

When the uncertainty arising from IBOR reform is no longer present with respect to the timing and the amount of the interest rate benchmark-based cash flows of the hedged item or hedging instrument, or – except for last item – when the hedging relationship is discontinued, the Bank will cease to apply the respective Phase 1 amendments.

3. Significant accounting policies (continued)

The Phase 2 amendments (policy applied from 1 January 2020)

The Bank has early adopted the Phase 2 amendments and retrospectively applied the amendments from 1 January 2020 (see Note 2.1).

When the basis for determining the contractual cash flows of the hedged item or hedging instrument changes as a result of IBOR reform and therefore there is no longer uncertainty arising about the cash flows of the hedged item or the hedging instrument, the Bank amends the hedge documentation of that hedging relationship to reflect the change(s) required by IBOR reform. For this purpose, the hedge designation is amended only to make one or more of the following changes:

- designating an alternative benchmark rate as the hedged risk;
- updating the description of the hedged item, including the description of the designated portion of the cash flows or fair value being hedged;
- updating the description of the hedging instrument; or
- updating the description of how the entity will assess hedge effectiveness.

The Bank amends the description of the hedging instrument only if the following conditions are met:

- it makes a change required by IBOR reform by changing the basis for determining the contractual cash flows of the hedging instrument or using another approach that is economically equivalent to changing the basis for determining the contractual cash flows of the original hedging instrument; and
- the original hedging instrument is not derecognised.

The Bank amends the formal hedge documentation by the end of the reporting period during which a change required by IBOR reform is made to the hedged risk, hedged item or hedging instrument. These amendments in the formal hedge documentation do not constitute the discontinuation of the hedging relationship or the designation of a new hedging relationship.

If changes are made in addition to those changes required by IBOR reform described above, then the Bank first considers whether those additional changes result in the discontinuation of the hedge accounting relationship. If the additional changes do not result in the discontinuation of the hedge accounting relationship, then the Bank amends the formal hedge documentation for changes required by IBOR reform as mentioned above.

Policies specific to non-contractually specified risk portions

When the Bank designates an alternative benchmark rate as a hedged risk and the alternative benchmark rate is a non-contractually specified risk portion that is not separately identifiable at the date it is designated, the Bank deems that the rate meets the separately identifiable criterion if it reasonably expects that the alternative benchmark rate will be separately identifiable within a 24-month period. The 24-month period applies on a rate-by-rate basis and starts from the date when the Bank first designates the alternative benchmark rate as a hedged risk.

If the Bank subsequently expects that a non-contractually specified alternative benchmark rate risk component will not be separately identifiable within the 24-month period, then it discontinues hedge accounting prospectively from the date of that reassessment for all hedging relationships in which the alternative benchmark rate is designated as a non-contractually specified risk portion.

Policies specific to cash flow hedges

When the interest rate benchmark on which the hedged future cash flows had been based is changed as required by IBOR reform, for the purpose of determining whether the hedged future cash flows are expected to occur, the Bank deems that the hedging reserve recognised in OCI for that hedging relationship is based on the alternative benchmark rate on which the hedged future cash flows will be based.

3. Significant accounting policies (continued)

3.10. Investments in subsidiaries, joint ventures and associates

'Investments in subsidiaries, joint ventures and associates' are recorded at cost less impairment losses. The impairment loss is measured using the Free Cash Flow to Equity model.

Free Cash Flow to Equity model

The Management of the companies which are subject to the impairment test provide projection of free cash flow to equity which are expected to be paid out by their companies in a period of five years. The model calculates the present value of these cash flows discounting them at the cost of equity resulting from the Capital Asset Pricing Model ('CAPM'). Cash flows after the period of five years are determined by the present value of the perpetuity with the particular estimated growth rate, determined at the ISP Group level specifically for the Slovak market.

3.11. Transactions under common control

Transactions under common control refer to business combinations involving entities belonging to the same group. More specifically, a combination of entities or businesses under common control is a business combination in which all of the combining entities or businesses are ultimately controlled by the same party or parties both before and after the business combination, and that control is not transitory.

The Bank follows the accounting treatment of such transactions in continuity of values (pooling of interests) that consists of maintaining the book values of the acquiree in the financial statements of the acquirer. Assets and liabilities of the acquired company are recognised at the carrying amounts compliant with IFRS. Any differences between net equity of the acquired company and the investment in subsidiaries carried at cost are recorded in retained earnings of the acquirer.

Comparative periods are not subject to restatement since the Bank was not consolidating the results of the acquiree in its separate financial statements before the date of the combination.

3.12. Property and equipment

Land and buildings are recognised at fair value based on periodic, but at least annually, valuations by external independent specialized companies, less subsequent depreciation for buildings.

If the new fair value is higher than the carrying amount the value of the asset on the balance sheet is increased through other comprehensive income and accumulated in equity under the heading 'Buildings and land'. In case that an impairment loss was previously recorded in the income statement, the reversal of this impairment is recorded in the income statement up to the amount previously recognised in the income statement. If the new fair value is lower than the carrying amount, the decrease is recognised in profit or loss. The ISP Group chose to apply the elimination approach, which means that the accumulated depreciation is eliminated against the gross carrying amount of the asset at revaluation date. The assets subject to the revaluation model are depreciated based on their revalued value.

All other property and equipment is recorded at historical cost less accumulated depreciation and impairment losses. Acquisition cost includes the purchase price plus other costs related to acquisition such as freight, duties or commissions. The costs of expansion, modernisation or improvements leading to increased productivity, capacity or efficiency are capitalised. Repairs and renovations are charged to the statement of profit or loss when the expenditure is incurred.

Depreciation is calculated on a straight-line basis in order to write off the cost of each asset to its residual value over its estimated useful economic life as follows:

	Years
Buildings	10 – 29
Equipment	4 – 12
Other tangibles	4 – 12

Land, assets in progress and art collections are not depreciated. The depreciation of assets in progress begins when the related assets are put into use.

The Bank tests its assets for impairment on annual basis. Where the carrying amount of an asset is greater than its estimated recoverable amount, it is written down to this recoverable amount.

3. Significant accounting policies (continued)

Depreciation methods, useful lives and residual values are reassessed at the reporting date.

Property and equipment contains also right-of-use assets. (note 3.16)

3.13. Intangible assets

Intangible assets are recorded at historical cost less accumulated amortisation and impairment losses. Amortisation is calculated on a straight-line basis in order to write off the cost of each asset to its residual value over its estimated useful economic life as follows:

	Years
Software and Other intangible assets	7 – 10

Amortisation methods, useful lives and residual values are reassessed at the reporting date.

3.14. Goodwill

Goodwill represents the excess of the cost of an acquisition over the fair value of the Bank's share of the identifiable assets, liabilities and contingent liabilities of the acquired subsidiary at the date of acquisition.

Goodwill is measured at cost less impairment, if any. Goodwill is tested for impairment annually or more frequently if events or changes in circumstances indicate that the carrying amount may be impaired.

3.15. Non-current assets held for sale

Non-current assets held for sale are assets where the carrying amount will be recovered principally through a sale transaction rather than through continuing use. They are represented by assets that are available for immediate sale in their present condition and their sale is considered to be highly probable.

Assets classified as held for sale are measured at the lower of their carrying amount and fair value less cost to sell.

3.16. Leasing – right-of-use assets and lease liabilities

The Bank is a party to lease contracts for:

- Buildings and land (branch and office premises and lands under ATMs),
- Other tangible assets (motor vehicles).

Leases are recognized, measured and presented in line with IFRS 16.

Leases in which the Bank is a lessee

The Bank applies a single accounting model, requiring lessees to recognise assets and liabilities for all leases. However, the Bank applies exemptions regarding:

- Leases with a lease term of 12 months or less and containing no purchase options;
- Leases where the underlying asset has a low value ('small-ticket' leases).

Based on the accounting policy applied the Bank recognizes a right-of-use asset (note 3.12) and a lease liability (note 3.7.2) at the commencement date of the contract for all leases conveying the right to control the use of an identified assets for a period of time. The commencement date is the date on which a lessor makes an underlying asset available for use by a lessee.

The right-of-use assets are initially measured at cost, which comprises:

- The amount of the initial measurement of the lease liability,
- Any lease payments made at or before the commencement date, less any lease incentives,
- Any initial direct costs incurred by the lessee,
- An estimate of costs to be incurred by the lessee in dismantling and removing the underlying assets or restoring the site on which the assets are located.

After the commencement date the right-of-use assets are measured at cost less any accumulated depreciation and any accumulated impairment losses and adjusted for any re-measurement of the lease liability.

3. Significant accounting policies (continued)

The right of use is recognized as part of 'Property and equipment'. Depreciation is calculated using the straight-line method over the estimated useful lives, as follows:

	Years
Buildings	2 – 6
Other tangibles	2 – 5

If the lease transfers ownership of the underlying asset to the Bank by the end of the lease term or if the cost of the right-of-use asset reflects that the Bank will exercise a purchase option, the Bank depreciates the right-of-use asset from the commencement date to the end of the useful life of the underlying asset. Otherwise, the Bank depreciates the right-of-use asset from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the lease term.

The Bank recognizes asset retirement obligations mainly in relation to leased premises which would need to be restored to previous state when the lease ends. Asset retirement obligations are capitalized as part of the cost of right-of-use assets and depreciated over the asset's estimated useful life. The Bank estimates the fair value of asset retirement obligations using average premises reinstatement cost and the discount rate which equals the risk-free interest rate for the Bank and the currency of the lease contract.

The lease liability is initially measured at the present value of the lease payments that are not paid at that date. These include:

- Fixed payments, less any lease incentives receivable;
- Variable lease payments that depend on an index or a rate, initially measured using the index or rate as at the commencement date;
- Amounts expected to be payable by the lessee under residual value guarantees;
- The exercise price of a purchase option if the lessee is reasonably certain to exercise that option; and
- Payments of penalties for terminating the lease, if the lease term reflects the lessee exercising an option to terminate the lease.

The lease payments exclude variable elements which are dependent on external factors. Variable lease payments not included in the initial measurement of the lease liability are recognized directly in the profit and loss in the line 'Other administrative expenses'.

The lease payments are discounted using the Bank's incremental borrowing rate or the rate implicit in the lease contract. Interest expense is recognised in the statement of profit or loss in the line 'Interest and similar expenses'.

The lease term determined by the Bank comprises:

- Non-cancellable period of lease contracts,
- Periods covered by an option to extend the lease if the lessee is reasonably certain to exercise that option,
- Periods covered by an option to terminate the lease if the lessee is reasonably certain not to exercise that option.

After the commencement date the Bank measures the lease liability by:

- Increasing the carrying amount to reflect interest on the lease liability,
- Reducing the carrying amount to reflect lease payments made, and
- Re-measuring the carrying amount to reflect any reassessment or lease modifications.

Leases in which the Bank is a lessor

In case of lease contracts based on which the Bank is acting as a lessor each of its leases is classified as either operating or finance lease. Leases where a significant portion of the risks and rewards of ownership are retained by the lessor are classified as operating leases.

3. Significant accounting policies (continued)

A lease is classified as a finance lease if it transfers substantially all the risks and rewards incidental to ownership to the lessee. Examples of situations where the risks and rewards of ownership are considered as having been transferred to the lessee are as follows:

- The lease transfers ownership of the asset to the lessee by the end of the lease term,
- The lessee has the option to purchase the asset at a price that is expected to be sufficiently lower than the fair value at the date the option becomes exercisable for it to be reasonably certain, at the inception of the lease, that the option will be exercised,
- The lease term is for at least 3/4 of the economic life of the asset even if title is not transferred,
- At the inception of the lease the present value of the minimum lease payments amounts to at least 90% of the fair value of the leased asset, or
- The leased assets are of such a specialized nature that only the lessee can use them without major modifications.

3.17. Provisions

Provisions comprise litigations and claims, financial guarantees and loan commitments.

Provisions for litigations and claims 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.

Financial guarantees are contracts that require the Bank to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make a payment when it falls due, in accordance with the terms of a debt instrument consisting of letters of credit, guarantees and acceptances.

Financial guarantee liabilities are initially recognised in off-balance sheet at their fair value, and the initial fair value is amortised over the life of the financial guarantee. Income from financial guarantees is recognised in the statement of profit or loss in ‘Fee and commission income’ on a straight line basis.

Provision for financial guarantees are recognised based on stage of financial instrument (three-stage approach) which affects expected loss calculation for the financial guarantee. Any increase or decrease in the provision relating to financial guarantees is recorded in the statement of profit or loss in ‘Impairment losses’. In case when the Bank is called to fulfill the guarantee and the guarantee is paid to the holder of the guarantee it ceases to exist. Instead a receivable against the counterparty for which the Bank issued the guarantee is created and the former provision for financial guarantees is converted into impairment losses allowance on such receivable along with the movement, if any, within ‘Impairment losses’.

Loan commitments are firm commitments to provide credit under pre-specified terms and conditions.

For loan commitments the Bank also recognises Provisions based on stage of financial instrument. Any increase or decrease in the provision relating to Loan commitments is reflected in the statement of profit or loss in ‘Impairment losses’.

3.18. Provisions for employee benefits

The Bank’s obligation in respect of retirement and jubilee employee benefits is the amount of future benefit that employees have earned in return for their service in the current and prior periods. That benefit is discounted to determine its present value. Employee benefit reserves are disclosed in the statement of financial position in ‘Other liabilities’. All gains or losses in relation to the employee benefits are recognised in ‘Salaries and employee benefits’.

3.19. Equity reserves

The reserves recorded in equity that are disclosed in the statement of financial position include:

- ‘Revaluation surplus of buildings and land’ reserve which consists of the revaluation surplus of buildings and land measured at fair value using a revaluation model.
- ‘Cash flow hedges’ reserve which comprises the portion of the gain or loss on a hedging instrument in a cash flow hedge that is determined to be an effective hedge.
- ‘Financial assets at fair value through other comprehensive income’ reserve which comprises changes in the fair value of financial assets at FVOCI.
- ‘Translation of foreign operation’ reserve which is used to record exchange differences arising from the translation of the net investment in foreign operations.

3. Significant accounting policies (continued)

3.20. Net interest income

Interest income and expense is recognised in the statement of profit or loss on an accrual basis using the effective interest rate method. Interest income and expense includes the amortisation of any discount or premium on financial instruments. Interest income also includes up-front and commitment fees, which are subject to the effective interest rate calculation and are amortised over the life of the loan.

Other interest income includes interest received on financial assets at fair value through profit or loss.

3.21. Net fee and commission income

Fee and commission income and expense that are integral to the effective interest rate on a financial asset or financial liability are included in the effective interest rate (see note 3.21).

Other fee and commission income arises on financial services provided by the Bank including account maintenance, cash management services, brokerage services, administrative services regarding loans, investment advice and financial planning, investment banking services, project finance transactions, asset management services, factoring services and other. Fee and commission income and expense is recognised when the corresponding service is provided. If a loan commitment is not expected to result in the draw-down of a loan, then the related loan commitment fee is recognised on a straight-line basis over the commitment period.

Other fee and commission expenses relate mainly to transaction and service fees, account maintenance and brokerage fees which are expensed as the services are received.

3.22. Net trading result

'Net trading result' includes gains and losses arising from purchases, disposals and changes in the fair value of Financial assets and financial liabilities including securities and derivative instruments. It also includes the result of all foreign currency transactions.

3.23. Dividend income

'Dividend income' is recognised in the statement of profit or loss on the date that the dividend is declared.

3.24. Special levy of selected financial institutions

Commencing 1 January 2012, banks operating in the Slovak Republic are subject to a special levy of selected financial institutions calculated from selected liabilities. Based on the amendment to the Act No. 384/2011 on the Special levy of selected financial institutions from 12 October 2016, the levy rate has been set to 0.2% p. a. for the years 2017 to 2020. Based on the another amendment from 28 November 2019, the levy rate has been set to 0.4% p. a. for the year 2020. The levy is recognized in the statement of profit or loss and other comprehensive income on an accrual basis and is payable at the beginning of each quarter.

As at 21 July 2020, the amendment to Act no. 67/2020 Coll. on certain emergency financial measures in relation to the spread of dangerous contagious human disease COVID-19 became effective. This amendment also covered measures in the area of special levy of selected financial institutions. According to these measures no more special levy payments were required from July 2020 until the end of 2020.

Subsequently this special levy was cancelled in full effectively from 1 January 2021. (note 29)

3.25. Current and deferred income tax

Income tax is calculated in accordance with the regulations of the Slovak Republic and other jurisdictions, in which the Bank operates.

Deferred income tax assets and liabilities are recognised, using the balance sheet method, for all temporary differences arising between the carrying amounts of assets and liabilities and their tax bases. Expected tax rates, applicable for the periods when assets and liabilities are realised, are used to determine deferred tax.

The Bank is also subject to various indirect operating taxes, which are included in 'Other operating expenses'.

4. Financial and operational risk management

This note presents information about the Bank's exposure to the risks related to the use of financial instrumets, the Bank's objectives, policies and processes for measuring and managing risk.

The Management Board is the statutory body governing the executive management of the Bank, and has absolute authority over all matters concerning risk. The Management Board has primary responsibility for the creation and dissolution of risk related governance bodies. The primary governance bodies overseeing risk issues are:

- Asset/Liability Committee ('ALCO'),
- Credit Risk Governance Committee ('CRGC'),
- Operational Risk Committee ('ORC').

The Management Board delegates its risk authority to these governance bodies through statutes, which identify members of the governance bodies, competencies and responsibilities of the members. The competency of each governance body is established in relevant Charters.

The Bank's risk management policies are established to identify and analyse the risks faced by the Bank, to set appropriate risk limits and controls and to monitor risks and adherence to limits. Risk management policies and systems are reviewed regularly to reflect changes in market conditions, products and services offered. The Bank, through its training and management standards and procedures, aims to develop a disciplined and constructive control environment, in which all employees understand their roles and obligations. The Bank's Internal Audit Department is responsible for monitoring compliance with the Bank's risk management policies and procedures, and for reviewing the adequacy of the risk management framework in relation to the risks faced by the Bank. Internal Audit undertakes both regular and ad-hoc reviews of risk management controls and procedures.

4.1. Credit risk

Credit risk is the risk of a financial loss to the Bank if a customer or counterparty to a financial instrument fails to meet its contractual obligations, and arises principally from the Bank's loans and advances to customers and banks as well as investment securities. For risk management reporting purposes, the Bank considers and consolidates all elements of credit risk exposure (such as individual obligor default risk, country and sector risk). For risk management purposes, the credit risk arising on trading securities is managed independently, but reported as a component of market risk exposure.

The Credit Risk Charter ('CRC') establishes the guidelines for measurement, control and management of credit risk by defining the legal framework, main responsibilities, policies and methodologies that support the credit risk management process of VUB Bank.

More specifically, CRC defines both the general and specific (retail, corporate) credit risk requirements for applied methodologies and procedures, and includes, as separate sections, the policies governing the key aspects of the Bank's credit risk management process:

- Authorized Approval Authority,
- Collateral Management Policy,
- Provisioning Policy,
- Credit Concentration Limits,
- Default Definition,
- Risk Management Client Segmentation Policy,
- Corporate Credit Policy, Retail Credit Policy,
- Retail and Corporate Remedial Management and Collections.

4. Financial and operational risk management (continued)

4.1.1. Management of credit risk

The Risk Management Division is established within the Bank as a Control Unit and managed by the Chief Risk Officer, who is a member of the Bank's Management Board. The Risk Management Division is organisationally structured to provide support to the Business Units, as well as to provide reporting of credit, market and operational risks to the Supervisory Board and Management Board. The Risk Management Division is responsible for overseeing the Bank's credit risk including:

- The development of credit risk strategies, policies, processes and procedures covering rules for credit assessment, collateral requirements, risk grading and reporting;
- Setting limits for the concentration of exposure to counterparties, related parties, countries and total assets and monitoring compliance with those limits;
- Establishment of the authorisation structure for the approval and renewal of credit facilities. Authorisation limits are set in the CRC;
- Credit risk assessment according to defined policy;
- Monitoring of quality portfolio performance and its compliance with set limits (regulatory, internal). Regular reports are provided to the Management Board and the CRC on the credit quality of the Bank's portfolios;
- Development, maintenance and validation of scoring and rating models – both application and behavioural;
- Development, maintenance and back-testing of impairment loss models.

4.1.2. Impairment losses

The Bank establishes an allowance for impairment losses, which represents its ECL in its loan portfolio.

If there is evidence of impairment for any individually significant client of the Bank, such as a breach of contract, problems with repayments or collateral, the Bank transfers such a client to management of the Recovery Department for pursuing collection activities. Such clients exceeding significant thresholds (€ 500 thousand) are considered to be individually impaired. For collective impairment (other than individually significant client), the Bank uses historical evidence of impairment and forward-looking information on a portfolio basis, mainly based on the payment discipline of the clients.

Rules for identification of significant clients and methodology for calculation are set in the Credit Risk Charter or stated in the Provisioning Policy procedure.

The individual assessment of exposures is based on the detailed review and analysis of the borrower's situation, including the critical review of the following sources of information, without limitation to:

- The latest financial statements available (including consolidated ones, if any) accompanied by the report on operations and audit report, if any, as well as previous years' financial statements;
- Information on specific corporate events (e.g. extraordinary transactions);
- The current and forecast financial position and results, analysis of variances between forecasts and actuals;
- For borrowers belonging to economic groups, information on their internal and external relationships (to assess the risk of contamination or its deterioration);
- The list of bank relationships (credit lines/utilisation/transaction status);
- The customer's short- and medium-term plans and strategies supplemented by financial projections (at least three-year), the statement of expected cash flows, product analysis, sector and market studies, etc.;
- Any documentation by third-party experts on the reasons for the borrower's deterioration, and potential actions to reorganise the company and exit from the crisis;
- Updated business profiles from the Chamber of Commerce, Corporate Registry or equivalent, cadastral surveys concerning all debtors and guarantors;
- Nature and validity of the collaterals, appraisal for each asset, presence of mortgage/pledge registrations other than the Bank's;
- Latest and historical Credit Bureau reports.

The individual assessment, formulated analytically for each exposure, shall be based on the detailed and comprehensive review of all elements that are available.

4. Financial and operational risk management (continued)

Inputs, assumptions and techniques used for estimating impairment

Calculation of ECL on a collective basis is based on particular regulatory segment, exposure at default ('EAD'), probability of default ('PD'), loss given default ('LGD'), credit conversion factor ('CCF'). For each segment were developed models for such risk parameters. These models are regularly reviewed by development function, Department Internal Validation and Controls and Department Internal Audit.

The Bank identified the following portfolios: Retail – Consumer Loans, Retail – Overdrafts, Retail – Credit cards, Corporate – Small and Medium Enterprises ('SME'), Mortgage Loans, SME Retail, Large corporate above € 500 million turnover, Large corporate up to € 500 million turnover, Non-Banking Financial Institutions, Banks, Municipalities, Sovereigns and Public Sector Entities, Slotting models (for Special Purpose Vehicles ('SPV') and Real Estate Development ('RED')), Group of flat owners a models for former VUB subsidiaries (CFH Mortgage Loans, CFH Credit Cards, CFH Retail Other).

The methodology of risk parameters used by ECL calculation is compliant with the ISP Group methodology provided by Parent Company.

For PD models of the portfolios where the Bank uses internal models, the advanced approach is used. The modelling approach consists of the following steps:

- Creation of migration matrices using the internal ratings;
- Removal of macroeconomic effect from the migration matrices using the Merton formula;
- Creation of Through-the-cycle ('TTC') matrix computed as the average of the annual migration matrices obtained after the removal of the macroeconomic effect;
- Creation of the future Point-in-Time ('PIT') matrices obtained by conditioning the TTC matrix using Merton formula and forward looking information;
- Obtaining the final Lifetime PD vectors by multiplying the predicted PIT and TTC matrices adjusted by add-on for incorporation of various economic scenarios.

For LGD models of the portfolios where the Bank uses internal models, the modelling approach consists of the following steps:

- Calculation of nominal LGD values;
- Incorporation of forward looking information using coefficients calculated based on Path-generator issued by the European Banking Authority ('EBA');
- Obtaining the final LGD values by discounting the recovery rates using effective interest rate and average time to recovery.

For the portfolios, where it is unable to follow this approach (unavailability of internal model, low number of observations, low number of defaults, unavailability of macroeconomic model for the portfolio) the Bank follows a simplified approach, e.g. final values provided from the Parent Company, notching criteria, using the country rating and LGD, etc.

The counterparties with low number of observations and with low numbers of observed defaults, where it was unable to create reliable migration matrices or develop the macroeconomic satellite models for prediction of default rate, were defined as the Low default portfolio. The parameters for these portfolios are obtained from parent company.

EAD is calculated separately for amortizing and non-amortizing products. EAD for amortizing products is based on the repayment plans, while EAD for non-amortizing products is calculated using Credit Conversion Factor (CCF). Currently, the Bank uses CCF models only for Retail - Credit Cards and Retail - Overdrafts. For all other segments regulatory CCF values are used.

Days past due ('DPD') methodology

The Bank follows Guidelines on the application of the definition of default EBA/GL/2016/07 Days past due and default methodology and it is on obligor level. For the purpose of assessing the materiality of past-due credit obligations, the bank takes into account any amount of principal, interest or fee that has not been paid at the date it was due. In case of modifications of the schedule of credit obligations, the counting of days past due is based on the modified schedule of payments.

Where the credit arrangement explicitly allows the obligor to change the schedule, suspend or postpone the payments under certain conditions and the obligor acts within the rights granted in the contract, the bank does not consider changed, suspended or postponed instalments as past due and bases the counting of days past due on the new schedule once it is specified.

4. Financial and operational risk management (continued)

When the obligor changes due to an event such as a merger or acquisition of the obligor or any other similar transaction, the counting of days past due starts from the moment a different person or entity becomes obliged to pay the obligation. The counting of days past due is, instead, unaffected by a change in the obligor's name.

The assessment of the materiality of past due credit obligations is performed daily. The information about the days past due and default is up-to-date whenever it is being used for decision making, internal risk management, internal or external reporting and the own funds requirements calculation processes.

The calculation of days past due starts at the moment when the obligor-level overdue exposure breaches both absolute and relative thresholds. Materiality threshold is composed of both an absolute and a relative component according to the Commission Delegated Regulation (EU) 2018/171 of 19 October 2017 on supplementing the Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to regulatory technical standards for the materiality threshold for credit obligations past due.

The absolute threshold is exceeded when:

$$\text{overdue exposure} > \text{absolute threshold}$$

The absolute threshold refers to the sum of all past due amounts related to the credit obligations of the borrower towards the Bank. The absolute threshold is set to € 100 for retail exposures and € 500 for non-retail exposures.

The relative threshold is exceeded when:

$$\text{overdue exposure}/\text{total obligor's on-balance sheet exposure} > \text{relative threshold}$$

The relative threshold is defined as a percentage of a credit obligation past due in relation to the total on-balance-sheet exposures to the obligor excluding equity exposures. The relative threshold is set at the level of 1% for both retail and non-retail exposures.

Staging methodology

According to the IFRS 9, paragraph 5.5.9 „At each reporting date, an entity shall assess whether the credit risk on a financial instrument has increased significantly since initial recognition. When making the assessment, an entity shall use the change in the risk of a default occurring over the expected life of the financial instrument".

IFRS 9 introduced the three-stage approach based on changes in credit quality since initial recognition:

- Stage 1 includes financial instruments that have not deteriorated significantly in credit quality since initial recognition or that have low credit risk at the reporting date.
- Stage 2 includes financial instruments that have deteriorated significantly in credit quality since initial recognition but that do not have objective evidence of a credit loss event.
- Stage 3 includes financial assets that have objective evidence of impairment at the reporting date.

The Bank implemented internal rules using significant days past due, significant increase of PD, forbearance measures, early warning system, proactive credit management ('PCM') process, non-performing categories to assess correct stage for expected loss calculation. These indicators are described in more detail below.

The Bank's classification of exposures into the stages is based on the following criteria:

STAGE 1	STAGE 2	STAGE 3
Performing exposures with DPD less than 30	Performing non-defaulted contracts with more than 30 days past due	Non-performing Past Due
	Forborne performing exposures	Non-performing Unlikely to Pay
	Performing exposures showing Early warning signals and PCM	Non-performing Doubtful
	Performing exposures with significant increase in PD	

4. Financial and operational risk management (continued)

In general following rules are applied:

- At origination financial instruments are classified in Stage 1, except instruments which are credit-impaired at the date of acquisition, which are classified in the relevant stage;
- If there is not enough information to determine if credit has deteriorated significantly since origination, a financial instrument is classified into Stage 2.

As at 30 June 2021 and 30 June 2020 the Bank did not classify any financial assets as Purchased or Originated Credit Impaired ('POCI').

Stage 2 criterion: Performing exposures with more than 30 past due days

According to IFRS 9 Principle par. 5.5.11: '…there is a rebuttable presumption that the credit risk on a financial asset has increased significantly since initial recognition when contractual payments are more than 30 days past due.' To comply with this requirement the Bank adopts a days past due criterion according to the Days past due methodology described above.

Stage 2 criterion: Forborne performing exposures

Forborne status for performing exposures is identified as another criterion of credit deterioration since it represents concessions towards a client facing or about to face difficulties in meeting its financial commitments. Forborne performing exposures represent Forborne performing (originally) and Forborne performing stemming from Non-performing. The minimum probation period for these contracts is 24 months, after this period the contract might migrate to Stage 1 if it meets exit criteria from Forborne classification (for example there is not more than 30 DPD, contract is Performing or counterparty has repaid more than significant amount of its debt since entering to Forborne).

Stage 2 criterion: Performing exposures showing early warning signals and proactive credit management

Exposures with active Early Warning Signals ('EWS') and clients reported on PCM are classified in Stage 2 since they can be considered as exposures that have deteriorated significantly in credit quality since their recognition. Similarly to forborne status, identification and application of EWS follow the rules defined by the Bank. For IFRS 9 purposes, exposures with orange, red, light blue and dark blue EWS should be classified into Stage 2.

Early warning system performs regular monitoring of corporate clients portfolio; their risk assessment based on pre-defined criteria, grouped into 6 particular triggers families (Asset Quality Review Fatal indicators, Additional Asset Quality Review indicators, Client Missing Payments, Handling Account, Balance Sheet, and Client Management). Level of the riskiness for every particular detected case is expressed by the final EWS „traffic lights" as follows:

Traffic light	Meaning	Related action
Dark blue	Harder severity signals Fast Track activation	Classification to NPL
Light blue	Very high intensity signals Fast Track activation	Impairment proposal Classification proposal
Red	High intensity signals	Proactive management
Orange	Medium intensity signals	Proactive management
Dark green	Low intensity signals	Anomaly check (e.g. rating update)
Light Green	No negative signals	-

Once the counterparty is detected automatically by EWS or manually by the Proactive credit management ('PCM') team with risk severity HIGH and the respective deliberative body decides about inclusion of the counterparty in the PCM perimeter, the counterparty is flagged as PCM. The flag PCM is deactivated when the counterparty is excluded to full performing portfolio (Stage 1) or non-performing portfolio (Stage 3).

4. Financial and operational risk management (continued)

Stage 2 criterion: Performing exposures with significant increase in PD

A significant increase of PD between origination (or initial recognition) and reporting date is used as indicator of credit quality deterioration according to the IFRS 9 principle par. 5.5.9: 'At each reporting date, an entity shall assess whether the credit risk on a financial instrument has increased significantly since initial recognition. When making the assessment, an entity shall use the change in the risk of a default occurring over the expected life of the financial instrument.' PD at origination is used solely for the purposes of staging.

This criterion is applied for all the portfolios. The thresholds for each portfolio can vary. In order to assess whether credit risk has increased significantly since the origination, it is necessary to compare Lifetime PD between origination and reporting date.

This criterion is set individually for each portfolio however the main features of the methodology are common.

According to the methodology, the comparison should be performed between:

- $PD_{origination}$ – the lifetime PD over the residual maturity related to the rating to which the instrument belonged at the origination (if some other risk drivers e.g. year of life are used in addition to the rating, the values as of the reporting date are taken) and
- $PD_{reporting}$ – the lifetime PD over the residual maturity related to the rating to which the instrument belongs at the reporting date.

The relative change of the lifetime PD is calculated as $PD_{reporting}/PD_{origination} - 1$. If this relative change is greater than the set PD threshold then the exposure should be classified to the stage 2.

The proper setting of PD threshold is the core of this criterion. The Group methodology states the PD threshold could be different based on portfolio/model, residual maturity, rating class or other potential drivers. Indeed, the cumulative PDs and their relative differences (between some two rating grades) are changing very swiftly with increasing residual maturity. That's why the one common threshold for all maturities would not lead to proper staging. The differentiation of thresholds between rating classes is important, too – generally, the worse rating leads to the lower threshold.

Stage 3 criterion

Stage 3 financial assets are considered credit impaired. It is when one or more events that have a detrimental impact on the estimated future cash flows have occurred.

Evidence that a financial asset is credit-impaired includes the following observable data:

- Significant financial difficulty of the borrower or issuer;
- A breach of contract such as a default or past due event;
- The restructuring of a loan or advance by the Bank on terms that the Bank would not consider otherwise;
- It is becoming probable that the borrower will enter bankruptcy or other financial reorganisation; or
- The disappearance of an active market for a security because of financial difficulties.

A loan that has been renegotiated due to a deterioration in the borrower's condition is usually considered to be credit-impaired unless there is evidence that the risk of not receiving the contractual cash flows has reduced significantly and there are no other indicators of impairment.

4. Financial and operational risk management (continued)

Staging criteria for debt securities

Staging process for bonds is performed in parallel to the staging of loans. The criteria used to assess whether the credit quality of the bond has deteriorated significantly since origination is Lifetime PDs comparison.

The following criteria are approved for each stage for debt securities:

STAGE 1	STAGE 2	STAGE 3
Bonds with no significant credit quality deterioration Investment grade bonds (Low Credit Risk Exemption rule valid only for FVOCI Bonds for First Time Adoption of IFRS 9 ('FTA'))	Bonds with significant increase in PD since origination	Defaulted bonds

In addition to the above-mentioned criteria, the following rules should be followed for Stage Assignment:
- at origination financial instruments are classified in Stage 1;
- if there is not enough information to determine if credit has deteriorated significantly since origination, a financial instrument is classified into Stage 2.

Staging criteria for Low Default Portfolio and Intragroup exposures

Low Default Portfolio consists of exposures with the following parties:
- Sovereign (Central Banks, Governments, Municipalities, Public Sector Entities);
- Institutions (Banks, and Other Non-banking Financial Institutions);
- Large Corporate (Corporate with turnover more than € 500 million).

Intragroup exposures are exposures with the following parties:
- Parent Company;
- Bank's own subsidiaries;
- Other ISP Group subsidiaries.

Given their particular nature (exposures are within own bank group with low risk profile), intragroup transactions are always classified as Stage 1 with a 12-months ECL.

Since the models for Low Default Portfolio were developed by the Parent Company the staging rules for Low Default Portfolio and Intragroup exposures are set by the Parent Company for loans and bonds and valid at ISP Group level. Exposures are classified to Stage 2 based on the significant increase of the credit risk criterion measured by Lifetime PD comparison. This criterion for Low Default Portfolio is defined based on the specific rating and residual maturity of exposure. Thresholds are provided by the Parent Company. The thresholds are applied in the same way as described above in Stage 2 criterion: Performing exposures with significant increase in PD.

4. Financial and operational risk management (continued)

Expected credit loss calculation

Stage 1

The Expected Loss for exposures in Stage 1 is calculated as:

$$EL_{12m} = PD_{12m} \times LGD_{12m} \times EAD_{12m}$$

where:

- PD_{12m} = 1 year prediction PD estimated at time 0 (time 0 is the reporting date);
- LGD_{12m} = percentage of loss in case of default, estimated at time 0;
- EAD_{12m} = exposure at default, estimated at the beginning of the observation period.

In the calculation of Expected Credit Loss for positions expiring during the first year, in order to avoid the counting of an entire PD on yearly basis and to consider the real expiration date, PD can be adjusted as follows:

$$PD_n = 1 - \sqrt[12/n]{1 - PD_{1year}}$$

where n is the number of months to maturity.
For the transactions without a maturity date, it is assumed that they are subjected to annual review and their maturity is assumed to be equal to one year.

Stage 2

The formula of Lifetime Expected Loss, calculated considering the residual maturity with respect to the reporting date, is summarized as follows:

For exposures with remaining maturity less than or equal to one year (see Stage 1):

$$EL_{12m} = PD_{12m} \times LGD_{12m} \times EAD_{12m}$$

For exposures with remaining maturity greater than one year :

$$EL_{lifetime} = \sum_{t=1}^{M} \frac{EAD_t \times (PD_t - PD_{t-1}) \times LGD_t}{(1 + EIR)^{t-1}}$$

where:

- PD_t is cumulative PD estimated between time 0 and time *t* (time 0 is the reporting date, time *t* is the number of years till maturity);
- LGD_t is percentage of loss in case of default, estimated at time *t*;
- EAD_t is exposure at default, estimated at the beginning of the year *t*;
- EIR is Effective Interest Rate;
- M is residual maturity in years.

4. Financial and operational risk management (continued)

To illustrate the application of formula 2 for ECL calculation for exposures in Stage 2 with residual maturity of three years, the following example is provided:

$$EL_{lifetime} = EAD_1 \times PD_1 \times LGD_1 + \frac{EAD_2 \times (PD_2 - PD_1) \times LGD_2}{(1 + EIR)^1} + \frac{EAD_3 \times (PD_3 - PD_2) \times LGD_3}{(1 + EIR)^2}$$

where:

- EAD_1, EAD_2, EAD_3 are exposure at default at the beginning of each residual year;
- PD_1 is probability that exposure enters in default during the first year of residual maturity;
- $PD_2 – PD_1$ is marginal Lifetime PD that represents the probability that exposure enters in default during its second year of residual maturity;
- $PD_3 – PD_2$ is marginal Lifetime PD that represents the probability that exposure enters in default during its third year of residual maturity;
- LGD_1, LGD_2, LGD_3 is percentage of loss in case of default of each residual year;
- EIR is Effective Interest Rate.

In the calculation of Expected Credit Loss for position expiring during the first year in order to avoid the counting of an entire PD on yearly basis and to consider the real expiration date, PD should be adjusted.

For the transactions without a maturity date, it is assumed that they are subjected to annual review and their maturity is assumed to be equal to one year.

Additionally, for cases when residual maturity is a fraction of years, the Bank can choose to use the maturity as follows:

- When the portion of residual maturity that exceeds the year is greater than six months, the maturity will be rounded to the year immediately after;
- When the portion of residual maturity that exceeds the year is equal or lower than six months, the maturity will be rounded to the previous year.

Stage 3

The Bank decided to determine the provision for Non Performing exposures (transactions in Stage 3) including an Add-on, which estimation is based on forward looking elements, increasing the current level of coverage on NPLs.

The calculation of provision on Stage 3 exposures is based on the following formula:

$$EL_{Stage3} = PCBS * \left(1 + \text{Add-on}_{Performing}\right)$$

where:

- PCBS is the provision calculated based on scenarios determined by the Bank on NPLs;
- $\text{Add-on}_{Performing}$ is calculated as the average of Add-ons estimated for performing Lifetime LGD obtained with Best, Most-likely and Worst scenarios from scenarios given by EBA coefficients for corresponding segments.

Incorporation of forward-looking information

The Bank incorporates forward-looking information by using the Base scenario from the internal satellite models or the Baseline stress test coefficients, which are obtained from EBA Path-generator. Other scenarios are incorporated in the form of „add-on". Add-on is calculated as a combination of final PD or LGD values calculated for all three scenarios for 3 upcoming years.

The Bank uses internally developed satellite models for the prediction of default rate for various segments. These models are based on relevant macroeconomic variables such as for instance gross domestic product ('GDP'), unemployment rate ('UR'), consumer prices index, EURIBOR. The development of these models contains the model for the base scenario as well as the models for the other scenarios, which are used to calculate the add-on. This approach is used for most of the PD models.

4. Financial and operational risk management (continued)

The Bank uses also the stress test coefficients, which are the result of EBA Path-generator for stress testing. As the result we get the coefficients only for Adverse and Baseline scenario and therefore the Best coefficient is calculated additionally based on these two scenarios. The scenarios are then used for the calculation of the add-on. Using the EBA coefficients is characteristic for LGD models. Moreover, a similar approach is used for the calculation of add-on for the exposures in stage 3.

The satellite models for prediction of default rates are also used for other purpose such as stress testing. The base scenario represents a most-likely outcome. The other scenarios represent more optimistic and more pessimistic outcomes. Periodically, the Bank carries out recalibration of the satellite models.

The Bank identified risk drivers which are the main inputs for the models for each portfolio. The relevant drivers were selected to obtain the final models for each portfolio. The economic scenarios used the following ranges of the inputs for the quarters of years 2021, 2022 and 2023 by the satellite model application in 2020 and for the quarters of year 2020 by the satellite model development in 2018.The inputs were updated by Research department in the December 2020 considering NBS scenarios.

	GDP, (constant prices, % change)			Unemployment rate (Labour Force Sample Survey, %)			Consumer prices index (quarterly average, % change)			EURIBOR 3M (end of period)		
	Base scenario	Best scenario	Worst scenario	Base scenario	Best scenario	Worst scenario	Base scenario	Best scenario	Worst scenario	Base scenario	Best scenario	Worst scenario
1Q 2020	3,9	9,0	(8,2)	6,5	5,8	11,7	2,3	4,8	(0,3)	0,08	0,75	(1,1)
2Q 2020	3,9	8,9	(5,1)	6,5	5,7	11,8	2,3	5,1	(0,3)	0,08	1,00	(1,1)
3Q 2020	3,8	8,3	(4,3)	6,5	5,5	11,9	2,3	5,4	(0,3)	0,19	1,25	(1,1)
4Q 2020	3,6	7,0	(2,3)	6,5	5,5	11,9	2,3	4,6	(0,3)	0,34	1,50	(1,1)
1Q 2021	4,6	1,6	(2,0)	7,5	7,8	8,3	0,3	0,4	0,2	(0,54)	(0,54)	(1,03)
2Q 2021	16,0	12,8	9,2	7,7	8,0	8,5	0,5	0,6	0,3	(0,54)	(0,54)	(1,03)
3Q 2021	5,7	2,7	(0,9)	7,6	7,9	8,4	0,6	0,7	0,4	(0,53)	(0,53)	(1,03)
4Q 2021	9,1	6,1	2,5	7,5	7,8	8,3	0,9	1,0	0,7	(0,53)	(0,53)	(1,03)
1Q 2022	6,3	6,0	4,8	7,3	7,6	8,4	1,8	1,7	1,3	(0,53)	(0,53)	(1,02)
2Q 2022	5,5	5,1	4,0	7,2	7,5	8,6	1,9	1,8	1,4	(0,52)	(0,52)	(1,02)
3Q 2022	4,7	4,3	3,2	7,0	7,3	8,5	1,9	1,8	1,4	(0,52)	(0,52)	(1,02)
4Q 2022	4,4	4,0	2,9	6,7	7,0	8,4	1,9	1,8	1,4	(0,52)	(0,52)	(1,02)
1Q 2023	3,7	3,8	4,4	6,4	6,8	8,2	2,0	1,9	1,6	(0,31)	(0,49)	(0,94)
2Q 2023	3,5	3,6	4,2	6,2	6,6	8,0	2,1	2,0	1,7	(0,31)	(0,45)	(0,94)
3Q 2023	3,4	3,5	4,1	6,0	6,4	7,7	2,1	2,0	1,7	(0,31)	(0,44)	(0,94)
4Q 2023	3,8	3,9	4,5	5,8	6,2	7,5	2,1	2,0	1,7	(0,31)	(0,37)	(0,94)

Predicted relationships between the relevant drivers and default rates for various segments have been developed based on analysing historical data over the past seven to thirteen years. The range represents the values of the variables under the different scenarios.

4. Financial and operational risk management (continued)

The split of the stage 1 credit portfolio to individually and portfolio assessed is shown below:

June 2021 **€ '000**	**Portfolio assessed** **Gross amount**	**Impairment losses**	**Net amount**	**Individually assessed** **Gross amount**	**Impairment losses**	**Net amount**
Stage 1						
Financial assets at AC:						
Due from other banks	196 616	(168)	196 448	-	-	-
Due from customers:						
Public administration	210 575	(993)	209 582	-	-	-
Corporate	4 868 825	(27 632)	4 841 193	-	-	-
Retail	9 279 723	(8 585)	9 271 138	-	-	-
	14 359 123	(37 210)	14 321 913	-	-	-
	14 555 739	(37 378)	14 518 361	-	-	-
Financial assets at FVOCI – debt securities	6 011 703	(6 362)	6 005 341	-	-	-
Financial commitments and contingencies	1 335 028	(312)	1 334 716	-	-	-

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4. Financial and operational risk management (continued)

December 2020 € '000	Portfolio assessed Gross amount	Portfolio assessed Impairment losses	Portfolio assessed Net amount	Individually assessed Gross amount	Individually assessed Impairment losses	Individually assessed Net amount
Stage 1						
Financial assets at AC:						
Due from other banks	206 126	(706)	205 420	-	-	-
Due from customers:						
Public administration	126 202	(1 070)	125 132	-	-	-
Corporate	4 478 108	(24 315)	4 453 793	-	-	-
Retail	8 861 776	(9 549)	8 852 227	-	-	-
	13 466 086	(34 934)	13 431 152	-	-	-
	13 672 212	(35 640)	13 636 572	-	-	-
Financial assets at FVOCI – debt securities	1 611 015	(306)	1 610 709	-	-	-
Financial commitments and contingencies	4 767 567	(7 023)	4 760 544	-	-	-

4. Financial and operational risk management (continued)

The split of the stage 2 credit portfolio to individually and portfolio assessed is shown below:

June 2021 **€ '000**	**Portfolio assessed** Gross amount	Impairment losses	Net amount	**Individually assessed** Gross amount	Impairment losses	Net amount
Stage 2						
Financial assets at AC:						
Due from other banks:	1 226	(39)	1 187	-	-	-
Due from customers:						
Public administration	29 121	(1 262)	27 859	-	-	-
Corporate	386 593	(12 443)	374 150	-	-	-
Retail	543 000	(32 379)	510 621	-	-	-
	958 714	(46 084)	912 630	-	-	-
	959 940	(46 123)	913 817	-	-	-
Financial commitments and contingencies	182 810	(3 300)	179 510	-	-	-

4. Financial and operational risk management (continued)

December 2020	**Portfolio assessed**			**Individually assessed**		
€ '000	**Gross amount**	**Impairment losses**	**Net amount**	**Gross amount**	**Impairment losses**	**Net amount**
Stage 2						
Financial assets at AC:						
Due from customers:						
Public administration	26 717	(1 605)	25 112	-	-	-
Corporate	601 259	(12 125)	589 134	-	-	-
Retail	561 966	(36 312)	525 654	-	-	-
	1 189 942	(50 042)	1 139 900	-	-	-
	1 189 942	(50 042)	1 139 900	-	-	-
Financial commitments and contingencies	94 192	(2 161)	92 031	-	-	-

4. Financial and operational risk management (continued)

The split of the stage 3 credit portfolio to individually and portfolio assessed is shown below:

June 2021	**Portfolio assessed**			**Individually assessed**		
€ '000	**Gross amount**	**Impairment losses**	**Net amount**	**Gross amount**	**Impairment losses**	**Net amount**
Stage 3						
Financial assets at AC:						
Due from customers:						
Corporate	7 911	(3 427)	4 484	62 313	(43 089)	19 224
Retail	275 728	(157 579)	118 149	3 959	(3 095)	864
	283 639	(161 006)	122 633	66 272	(46 184)	20 088
	283 639	(161 006)	122 633	66 272	(46 184)	20 088
Financial commitments and contingencies	5 591	(1 608)	3 983	13 258	(3 479)	9 779

4. Financial and operational risk management (continued)

December 2020 € '000	Portfolio assessed Gross amount	Portfolio assessed Impairment losses	Portfolio assessed Net amount	Individually assessed Gross amount	Individually assessed Impairment losses	Individually assessed Net amount
Stage 3						
Financial assets at AC:						
Due from customers:						
Corporate	9 280	(4 085)	5 195	54 499	(41 206)	13 293
Retail	298 019	(164 654)	133 365	4 621	(3 389)	1 232
	307 299	(168 739)	138 560	59 120	(44 595)	14 525
	307 299	(168 739)	138 560	59 120	(44 595)	14 525
Financial commitments and contingencies	8 013	(1 635)	6 378	9 216	(3 085)	6 131

4. Financial and operational risk management (continued)

4.1.3. Non-performing loan classification

The Bank considers a financial asset to be in Non-performing status in compliance with the Commission's Implementing Regulation (EU) No 680/2014 and its further amendments (Implementing Technical Standards, 'ITS') when:

- The borrower is unlikely to pay its credit obligations to the Bank in full, without recourse by the Bank to actions such as realising security (if any is held); or
- The borrower is more than 90 days past due on any material credit obligations to the Bank.

The Bank uses the definitions of non-performing loans derived from the Harmonisation project. The Harmonisation project was driven by Intesa Sanpaolo in order to unify the definitions and categories of non-performing loans across the foreign subsidiaries of the ISP Group. The definition of non-performing loans, which comprise three classification categories (past due, unlikely to pay, doubtful), is based on delinquency (days past due) and judgemental criteria for the categories doubtful and unlikely to pay. In case of the past due category, DPD and materiality thresholds of borrower are taken into account.

The description of the classification categories of loans is as follows:

Classification category	Description
Doubtful	Exposures to borrowers being in a state of insolvency (although not yet legally) or in a de facto equivalent status, regardless of any loss forecasts made by the Bank.
Unlikely to pay	Exposures to borrowers assessed as improbable to thoroughly meet their credit obligations without recourse to actions such as the enforcement of guarantees/collateral.
Past due	Exposures other than those classified as doubtful or unlikely to pay that, as at the reporting date, are past due (DPD methodology above) for over 90 days
Performing	All exposures that are not classified as doubtful, unlikely to pay or past due.

For category Unlikely to pay are taken into account qualitative indicators such as:

- Borrowers facing difficulties in meeting payment obligations in a timely manner (thus exposed to their creditors' tolerance), despite the confident expectation of positive future operating cash flows;
- Borrowers under negotiations with the Bank for defining an out of Court restructuring/ settlement agreement;
- Borrowers which signed out of Court restructuring/settlement agreements and that are regularly servicing their financial obligations
- Borrowers whose credit quality indicators significantly worsened and where future cash flows are not expected to fully service the debt toward the Bank;
- Serious difficulties in borrower's business (additional equity required, liquidity seriously stretched)

For category Doubtful are taken into account qualitative indicators such as:

- If the borrower is under voluntary dissolution or under any legally binding liquidation, without possibility to operate on 'going concern basis';
- If the Court already ordered the legal liquidation, even if the borrower's operations are not suspended under the legal procedures;
- If according to any public Registry or by Court order the borrower ceases to exist as legal entity;
- If the borrower has been registered (has to be registered) on the Fraud/Black List;
- Borrowers which expected cash flows will not be generated from the borrowers' operations, but from the enforcement of collateral/ guarantees ('gone concern' approach);
- Borrowers (typically, Individuals) against whom the Bank initiates receivership or enforcement proceedings.
- Non-performing status is carried out at borrower level following the united rules of the Parent Company.

4. Financial and operational risk management (continued)

The following table describes the Bank's credit portfolio in terms of classification categories:

June 2021 **€ '000**	**Category**	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at AC:				
Due from other banks				
	Performing	197 842	(207)	197 635
Due from customers:				
Public administration				
	Performing	239 696	(2 255)	237 441
Corporate				
	Performing	5 255 418	(40 075)	5 215 343
	Past due	2 139	(192)	1 947
	Unlikely to pay	32 841	(16 883)	15 958
	Doubtful	35 244	(29 441)	5 803
		5 325 642	(86 591)	5 239 051
Retail				
	Performing	9 822 723	(40 964)	9 781 759
	Past due	31 805	(13 061)	18 744
	Unlikely to pay	26 342	(12 790)	13 552
	Doubtful	221 540	(134 823)	86 717
		10 102 410	(201 638)	9 900 772
		15 667 748	(290 484)	15 377 264
		15 865 590	(290 691)	15 574 899
Financial assets at FVOCI – debt securities				
	Performing	1 335 028	(312)	1 334 716
Financial commitments and contingencies				
	Performing	6 194 513	(9 662)	6 184 851
	Past due	1 620	(60)	1 560
	Unlikely to pay	13 431	(3 410)	10 021
	Doubtful	3 798	(1 617)	2 181
		6 213 362	(14 749)	6 198 613

4. Financial and operational risk management (continued)

December 2020 **€ '000**	**Category**	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at AC:				
Due from other banks				
	Performing	206 126	(706)	205 420
Due from customers:				
Public administration				
	Performing	152 919	(2 675)	150 244
Corporate				
	Performing	5 079 367	(36 440)	5 042 927
	Past due	1 496	(93)	1 403
	Unlikely to pay	27 108	(16 318)	10 790
	Doubtful	35 175	(28 880)	6 295
		5 143 146	(81 731)	5 061 415
Retail				
	Performing	9 423 742	(45 861)	9 377 881
	Past due	38 260	(15 046)	23 214
	Unlikely to pay	27 739	(12 950)	14 789
	Doubtful	236 641	(140 047)	96 594
		9 726 382	(213 904)	9 512 478
		15 022 447	(298 310)	14 724 137
		15 228 573	(299 016)	14 929 557
Financial assets at FVOCI – debt securities				
	Performing	1 611 015	(306)	1 610 709
Financial commitments and contingencies				
	Performing	4 861 759	(9 184)	4 852 575
	Past due	3 553	(271)	3 282
	Unlikely to pay	9 881	(3 146)	6 735
	Doubtful	3 795	(1 303)	2 492
		4 878 988	(13 904)	4 865 084

4. Financial and operational risk management (continued)

The following table shows the Bank's credit portfolio in terms of delinquency of payments:

June 2021 **€ '000**	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at AC:			
Due from other banks			
No delinquency	195 384	(207)	195 177
1 – 30 days	2 458	-	2 458
	197 842	(207)	197 635
Due from customers:			
Public administration			
No delinquency	239 696	(2 255)	237 441
Corporate			
No delinquency	5 269 006	(54 776)	5 214 230
1 – 30 days	19 957	(1 238)	18 719
31 – 60 days	2 127	(1 889)	238
61 – 90 days	100	(2)	98
91 – 180 days	1 887	(1 236)	651
Over 180 days	32 565	(27 450)	5 115
	5 325 642	(86 591)	5 239 051
Retail			
No delinquency	9 807 679	(51 011)	9 756 668
1 – 30 days	55 876	(8 223)	47 653
31 – 60 days	9 610	(1 998)	7 612
61 – 90 days	12 564	(2 771)	9 793
91 – 180 days	19 325	(10 818)	8 507
Over 180 days	197 356	(126 817)	70 539
	10 102 410	(201 638)	9 900 772
	15 667 748	(290 484)	15 377 264
	15 865 590	(290 691)	15 574 899
Financial assets at FVOCI - debt securities			
No delinquency	1 335 027	(312)	1 334 716
Financial commitments and contingencies			
No delinquency	6 213 362	(14 749)	6 198 613

4. Financial and operational risk management (continued)

December 2020 **€ '000**	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at AC:			
Due from other banks			
No delinquency	206 126	(706)	205 420
Due from customers:			
Public administration			
No delinquency	152 429	(2 672)	149 757
1 – 30 days	490	(3)	487
	152 919	(2 675)	150 244
Corporate			
No delinquency	5 013 493	(47 934)	4 965 559
1 – 30 days	89 686	(949)	88 737
31 – 60 days	181	(2)	179
61 – 90 days	1 932	(892)	1 040
91 – 180 days	4 655	(4 187)	468
Over 180 days	33 199	(27 767)	5 432
	5 143 146	(81 731)	5 061 415
Retail			
No delinquency	9 420 955	(54 553)	9 366 402
1 – 30 days	47 832	(7 743)	40 089
31 – 60 days	1 031	(410)	621
61 – 90 days	12 460	(3 037)	9 423
91 – 180 days	22 935	(11 336)	11 599
Over 180 days	221 169	(136 825)	84 344
	9 726 382	(213 904)	9 512 478
	15 022 447	(298 310)	14 724 137
	15 228 573	(299 016)	14 929 557
Financial assets at FVOCI - debt securities			
No delinquency	1 611 015	(306)	1 610 709
Financial commitments and contingencies			
No delinquency	4 878 988	(13 904)	4 865 084

4. Financial and operational risk management (continued)

The table below shows the credit quality by class of assets for all financial assets exposed to credit risk. Past due but not individually impaired financial assets are more than one day overdue.

June 2021 € '000	Neither past due nor impaired			Past due but not individually impaired			Impaired (non-performing)		
	Gross amount	Impairment losses	Net amount	Gross amount	Impairment losses	Net amount	Gross amount	Impairment losses	Net amount
Financial assets at AC:									
Due from other banks	195 384	(207)	195 177	2 458	-	2 458	-	-	-
Due from customers:									
Public administration									
Single Resolution Fund	-	-	-	-	-	-	-	-	-
State administration	127 884	(19)	127 865	-	-	-	-	-	-
Municipalities	111 812	(2 236)	109 576	-	-	-	-	-	-
	239 696	(2 255)	237 441	-	-	-	-	-	-
Corporate									
Large Corporates	2 092 836	(1 774)	2 091 062	2	-	2	236	(120)	116
Large Corporates – debt securities	129 295	(119)	129 176	-	-	-	-	-	-
Specialized Lending	898 462	(32 297)	866 165	3 675	(378)	3 297	4 409	(4 041)	368
SME	1 405 654	(4 733)	1 400 921	9 188	(202)	8 986	61 659	(41 279)	20 380
Other Non-banking Financial Institutions	517 658	(402)	517 256	-	-	-	-	-	-
Other Non-banking Financial Institutions - debt securities	80 251	(55)	80 196	-	-	-	-	-	-
Public Sector Entities	2 572	(83)	2 489	-	-	-	5	(1)	4
Factoring	110 210	(7)	110 203	5 615	(25)	5 590	3 915	(1 075)	2 840
	5 236 938	(39 470)	5 197 468	18 480	(605)	17 875	70 224	(46 516)	23 708

(Table continues on the next page)

4. Financial and operational risk management (continued)

June 2021 € '000	Neither past due nor impaired			Past due but not individually impaired			Impaired (non-performing)		
	Gross amount	Impairment losses	Net amount	Gross amount	Impairment losses	Net amount	Gross amount	Impairment losses	Net amount
Financial assets at AC:									
Due from customers:									
Retail									
Small Business	275 476	(4 523)	270 953	2 845	(148)	2 697	14 017	(10 058)	3 959
Consumer Loans	1 164 732	(20 291)	1 144 441	41 718	(5 491)	36 227	153 877	(95 777)	58 100
Mortgages	8 141 533	(6 991)	8 134 542	12 408	(580)	11 828	86 560	(36 784)	49 776
Credit Cards	81 842	(860)	80 982	3 306	(687)	2 619	18 119	(12 836)	5 283
Overdrafts	59 896	(1 014)	58 882	1 313	(157)	1 156	7 114	(5 219)	1 895
Flat Owners Associations	37 654	(222)	37 432	-	-	-	-	-	-
	9 761 133	(33 901)	9 727 232	61 590	(7 063)	54 527	279 687	(160 674)	119 013
	15 237 767	(75 626)	15 162 141	80 070	(7 668)	72 402	349 911	(207 190)	142 721
	15 433 151	(75 833)	15 357 318	82 528	(7 668)	74 860	349 911	(207 190)	142 721
Financial assets at FVOCI – debt securities	1 335 028	(312)	1 334 716	-	-	-	-	-	-
Financial commitments and contingencies	6 194 513	(9 662)	6 184 851	-	-	-	18 849	(5 087)	13 762

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4. Financial and operational risk management (continued)

December 2020 € '000	Neither past due nor impaired Gross amount	Impairment losses	Net amount	Past due but not individually impaired Gross amount	Impairment losses	Net amount	Impaired (non-performing) Gross amount	Impairment losses	Net amount
Financial assets at AC:									
Due from other banks	206 126	(706)	205 420	-	-	-	-	-	-
Due from customers:									
Public administration									
Single Resolution Fund	5 090	-	5 090	-	-	-	-	-	-
State administration	32 685	(3)	32 682	-	-	-	-	-	-
Municipalities	114 654	(2 669)	111 985	490	(3)	487	-	-	-
	152 429	(2 672)	149 757	490	(3)	487	-	-	-
Corporate									
Large Corporates	2 116 341	(1 901)	2 114 440	2	-	2	4 221	(3 254)	967
Large Corporates – debt securities	150 427	(265)	150 162	-	-	-	-	-	-
Specialized Lending	886 886	(28 954)	857 932	-	-	-	4 808	(4 788)	20
SME	1 278 610	(4 246)	1 274 364	83 724	(774)	82 950	51 149	(36 052)	15 097
Other Non-banking Financial Institutions	431 750	(171)	431 579	-	-	-	1	-	1
Other Non-banking Financial Institutions - debt securities	50 056	(48)	50 008	-	-	-	-	-	-
Public Sector Entities	1 279	(46)	1 233	-	-	-	5	(1)	4
Factoring	73 778	(9)	73 769	6 514	(26)	6 488	3 595	(1 196)	2 399
	4 989 127	(35 640)	4 953 487	90 240	(800)	89 440	63 779	(45 291)	18 488

(Table continues on the next page)

4. Financial and operational risk management (continued)

December 2020 € '000	Neither past due nor impaired Gross amount	Impairment losses	Net amount	Past due but not individually impaired Gross amount	Impairment losses	Net amount	Impaired (non-performing) Gross amount	Impairment losses	Net amount
Financial assets at AC:									
Due from customers:									
Retail									
Small Business	253 225	(4 172)	249 053	3 301	(212)	3 089	13 620	(9 728)	3 892
Consumer Loans	1 188 072	(25 069)	1 163 003	33 800	(5 004)	28 796	169 174	(103 873)	65 301
Mortgages	7 749 900	(7 951)	7 741 949	7 794	(362)	7 432	89 647	(33 335)	56 312
Credit Cards	79 870	(1 367)	78 503	1 435	(235)	1 200	22 787	(15 956)	6 831
Overdrafts	67 996	(1 106)	66 890	1 173	(164)	1 009	7 412	(5 151)	2 261
Flat Owners Associations	37 176	(219)	36 957	-	-	-	-	-	-
	9 376 239	(39 884)	9 336 355	47 503	(5 977)	41 526	302 640	(168 043)	134 597
	14 517 795	(78 196)	14 439 599	138 233	(6 780)	131 453	366 419	(213 334)	153 085
	14 723 921	(78 902)	14 645 019	138 233	(6 780)	131 453	366 419	(213 334)	153 085
Financial assets at FVOCI – debt securities	1 611 015	(306)	1 610 709	-	-	-	-	-	-
Financial commitments and contingencies	4 861 759	(9 184)	4 852 575	-	-	-	17 229	(4 720)	12 509

4. Financial and operational risk management (continued)

An analysis of past due but not individually impaired credit exposures in terms of delinquency is presented in the table below:

June 2021 € '000	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at AC:			
Due from other banks:			
1 – 30 days	2 458	-	2 458
Due from customers:			
Corporate			
1 – 30 days	18 231	(604)	17 627
31 – 60 days	152	-	152
61 – 90 days	97	(1)	96
	18 480	(605)	17 875
Retail			
1 – 30 days	45 149	(4 334)	40 815
31 – 60 days	6 939	(1 073)	5 866
61 – 90 days	9 502	(1 656)	7 846
	61 590	(7 063)	54 527
	80 070	(7 668)	72 402
	82 528	(7 668)	74 860

December 2020 € '000	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at AC:			
Due from customers:			
Public administration			
1 – 30 days	490	(3)	487
Corporate			
1 – 30 days	89 149	(797)	88 352
31 – 60 days	181	(1)	180
61 – 90 days	910	(2)	908
	90 240	(800)	89 440
Retail			
1 – 30 days	38 632	(4 321)	34 311
31 – 60 days	543	(100)	443
61 – 90 days	8 328	(1 556)	6 772
	47 503	(5 977)	41 526
	138 233	(6 780)	131 453
	138 233	(6 780)	131 453

4. Financial and operational risk management (continued)

The table below shows the three-stage approach based on changes in credit quality by class of assets for all financial assets exposed to credit risk.

June 2021 € '000	Stage 1 Gross amount	Stage 1 Impairment losses	Stage 1 Net amount	Stage 2 Gross amount	Stage 2 Impairment losses	Stage 2 Net amount	Stage 3 Gross amount	Stage 3 Impairment losses	Stage 3 Net amount
Financial assets at AC:									
Due from other banks	196 616	(168)	196 448	1 226	(39)	1 187	-	-	-
Due from customers:									
Public administration	-	-	-	-	-	-	-	-	-
Single Resolution Fund	127 884	(19)	127 865	-	-	-	-	-	-
State administration	82 691	(974)	81 717	29 121	(1 262)	27 859	-	-	-
Municipalities	-	-	-	-	-	-	-	-	-
	210 575	(993)	209 582	29 121	(1 262)	27 859	-	-	-
Corporate									
Large Corporates	1 958 919	(1 485)	1 957 434	133 919	(289)	133 630	236	(120)	116
Large Corporates – debt securities	120 560	(81)	120 479	8 735	(38)	8 697	-	-	-
Specialized Lending	835 336	(23 545)	811 791	66 801	(9 130)	57 671	4 409	(4 041)	368
SME	1 238 837	(1 975)	1 236 862	176 005	(2 960)	173 045	61 659	(41 279)	20 380
Other Non-banking Financial Institutions	517 658	(402)	517 256	-	-	-	-	-	-
Other Non-banking Financial Institutions - debt securities	80 251	(55)	80 196	-	-	-	-	-	-
Public Sector Entities	2 071	(60)	2 011	501	(23)	478	5	(1)	4
Factoring	115 193	(29)	115 164	632	(3)	629	3 915	(1 075)	2 840
	4 868 825	(27 632)	4 841 193	386 593	(12 443)	374 150	70 224	(46 516)	23 708

(Table continues on the next page)

4. Financial and operational risk management (continued)

June 2021 € '000	Stage 1 Gross amount	Stage 1 Impairment losses	Stage 1 Net amount	Stage 2 Gross amount	Stage 2 Impairment losses	Stage 2 Net amount	Stage 3 Gross amount	Stage 3 Impairment losses	Stage 3 Net amount
Financial assets at AC:									
Due from customers:									
Retail									
Small Business	208 037	(1 018)	207 019	70 284	(3 653)	66 631	14 017	(10 058)	3 959
Consumer Loans	1 016 015	(5 764)	1 010 251	190 435	(20 018)	170 417	153 877	(95 777)	58 100
Mortgages	7 905 108	(1 027)	7 904 081	248 833	(6 544)	242 289	86 560	(36 784)	49 776
Credit Cards	73 661	(199)	73 462	11 487	(1 348)	10 139	18 119	(12 836)	5 283
Overdrafts	39 246	(354)	38 892	21 963	(817)	21 146	7 114	(5 219)	1 895
Flat Owners Associations	37 654	(222)	37 432	-	-	-	-	-	-
	9 279 721	(8 584)	9 271 137	543 002	(32 380)	510 622	279 687	(160 674)	119 013
	14 359 121	(37 209)	14 321 912	958 716	(46 085)	912 631	349 911	(207 190)	142 721
	14 555 737	(37 377)	14 518 360	959 942	(46 124)	913 818	349 911	(207 190)	142 721
Financial assets at FVOCI – debt securities	1 335 028	(312)	1 334 716	-	-	-	-	-	-
Financial commitments and contingencies	6 011 703	(6 362)	6 005 341	182 810	(3 300)	179 510	18 849	(5 087)	13 762

4. Financial and operational risk management (continued)

December 2020 € '000	Gross amount	Stage 1 Impairment losses	Net amount	Gross amount	Stage 2 Impairment losses	Net amount	Gross amount	Stage 3 Impairment losses	Net amount
Financial assets at AC:									
Due from other banks	206 126	(706)	205 420	-	-	-	-	-	-
Due from customers:									
Public administration									
Single Resolution Fund	5 090	-	5 090	-	-	-	-	-	-
State administration	32 685	(3)	32 682	-	-	-	-	-	-
Municipalities	88 427	(1 067)	87 360	26 717	(1 605)	25 112	-	-	-
	126 202	(1 070)	125 132	26 717	(1 605)	25 112	-	-	-
Corporate									
Large Corporates	1 813 653	(1 277)	1 812 376	302 690	(624)	302 066	4 221	(3 254)	967
Large Corporates – debt securities	141 947	(100)	141 847	8 480	(165)	8 315	-	-	-
Specialized Lending	826 388	(21 050)	805 338	60 498	(7 904)	52 594	4 808	(4 788)	20
SME	1 135 338	(1 592)	1 133 746	226 996	(3 428)	223 568	51 149	(36 052)	15 097
Other Non-banking Financial Institutions	431 750	(171)	431 579	-	-	-	1	-	1
Other Non-banking Financial Institutions - debt securities	50 056	(48)	50 008	-	-	-	-	-	-
Public Sector Entities	1 279	(46)	1 233	-	-	-	5	(1)	4
Factoring	77 698	(32)	77 666	2 594	(3)	2 591	3 595	(1 196)	2 399
	4 478 109	(24 316)	4 453 793	601 258	(12 124)	589 134	63 779	(45 291)	18 488

(Table continues on the next page)

4. Financial and operational risk management (continued)

December 2020 € '000	Stage 1 Gross amount	Stage 1 Impairment losses	Stage 1 Net amount	Stage 2 Gross amount	Stage 2 Impairment losses	Stage 2 Net amount	Stage 3 Gross amount	Stage 3 Impairment losses	Stage 3 Net amount
Financial assets at AC:									
Due from customers:									
Retail									
Small Business	190 314	(979)	189 335	66 212	(3 405)	62 807	13 620	(9 728)	3 892
Consumer Loans	1 011 112	(6 523)	1 004 589	210 760	(23 550)	187 210	169 174	(103 873)	65 301
Mortgages	7 504 985	(1 033)	7 503 952	252 709	(7 280)	245 429	89 647	(33 335)	56 312
Credit Cards	69 727	(416)	69 311	11 578	(1 186)	10 392	22 787	(15 956)	6 831
Overdrafts	48 461	(379)	48 082	20 708	(891)	19 817	7 412	(5 151)	2 261
Flat Owners Associations	37 176	(219)	36 957	-	-	-	-	-	-
	8 861 775	(9 549)	8 852 226	561 967	(36 312)	525 655	302 640	(168 043)	134 597
	13 466 086	(34 935)	13 431 151	1 189 942	(50 041)	1 139 901	366 419	(213 334)	153 085
	13 672 212	(35 641)	13 636 571	1 189 942	(50 041)	1 139 901	366 419	(213 334)	153 085
Financial assets at FVOCI – debt securities	1 611 015	(306)	1 610 709	-	-	-	-	-	-
Financial commitments and contingencies	4 767 567	(7 023)	4 760 544	94 192	(2 161)	92 031	17 229	(4 720)	12 509

4. Financial and operational risk management (continued)

The table below shows the three-stage approach based on changes in credit quality by days past due for all financial assets exposed to credit risk.

June 2021 € '000	Stage 1 Gross amount	Stage 1 Impairment losses	Stage 1 Net amount	Stage 2 Gross amount	Stage 2 Impairment losses	Stage 2 Net amount	Stage 3 Gross amount	Stage 3 Impairment losses	Stage 3 Net amount
Financial assets at AC:									
Due from other banks									
No delinquency	194 158	(168)	193 990	1 226	(39)	1 187	-	-	-
1 – 30 days	2 458	-	2 458	-	-	-	-	-	-
	196 616	(168)	196 448	1 226	(39)	1 187	-	-	-
Due from customers:									
Public administration									
No delinquency	210 575	(993)	209 582	29 121	(1 262)	27 859	-	-	-
Corporate									
No delinquency	4 859 494	(27 557)	4 831 937	377 444	(11 912)	365 532	32 068	(15 307)	16 761
1 – 30 days	9 331	(75)	9 256	8 900	(529)	8 371	1 726	(634)	1 092
31 – 60 days	-	-	-	152	-	152	1 975	(1 889)	86
61 – 90 days	-	-	-	97	(2)	95	3	-	3
91 – 180 days	-	-		-	-	-	1 887	(1 236)	651
Over 180 days	-	-	-	-	-	-	32 565	(27 450)	5 115
	4 868 825	(27 632)	4 841 193	386 593	(12 443)	374 150	70 224	(46 516)	23 708

(Table continues on the next page)

4. Financial and operational risk management (continued)

June 2021 **€ '000**	**Stage 1** **Gross amount**	**Stage 1** **Impairment losses**	**Stage 1** **Net amount**	**Stage 2** **Gross amount**	**Stage 2** **Impairment losses**	**Stage 2** **Net amount**	**Stage 3** **Gross amount**	**Stage 3** **Impairment losses**	**Stage 3** **Net amount**
Financial assets at AC:									
Due from customers:									
Retail									
No delinquency	9 267 546	(8 254)	9 259 292	493 586	(25 648)	467 938	46 547	(17 109)	29 438
1 – 30 days	12 160	(330)	11 830	32 990	(4 004)	28 986	10 726	(3 889)	6 837
31 – 60 days	15	-	15	6 924	(1 073)	5 851	2 671	(925)	1 746
61 – 90 days	-	-	-	9 502	(1 655)	7 847	3 062	(1 116)	1 946
91 – 180 days	-	-	-	-	-	-	19 325	(10 818)	8 507
Over 180 days	-	-	-	-	-	-	197 356	(126 817)	70 539
	9 279 721	(8 584)	9 271 137	543 002	(32 380)	510 622	279 687	(160 674)	119 013
	14 359 121	(37 209)	14 321 912	958 716	(46 085)	912 631	349 911	(207 190)	142 721
	14 555 737	(37 377)	14 518 360	959 942	(46 124)	913 818	349 911	(207 190)	142 721
Financial assets at FVOCI – debt securities									
No delinquency	1 335 028	(312)	1 334 716	-	-	-	-	-	-
Financial commitments and contingencies									
No delinquency	6 011 703	(6 362)	6 005 341	182 810	(3 300)	179 510	18 849	(5 087)	13 762

4. Financial and operational risk management (continued)

December 2020 € '000	Stage 1 Gross amount	Stage 1 Impairment losses	Stage 1 Net amount	Stage 2 Gross amount	Stage 2 Impairment losses	Stage 2 Net amount	Stage 3 Gross amount	Stage 3 Impairment losses	Stage 3 Net amount
Financial assets at AC:									
Due from other banks									
No delinquency	206 126	(706)	205 420	-	-	-	-	-	-
Due from customers:									
Public administration									
No delinquency	125 877	(1 070)	124 807	26 552	(1 602)	24 950	-	-	-
1 – 30 days	325	-	325	165	(3)	162	-	-	-
	126 202	(1 070)	125 132	26 717	(1 605)	25 112	-	-	-
Corporate									
No delinquency	4 471 397	(24 288)	4 447 109	517 730	(11 352)	506 378	24 366	(12 294)	12 072
1 – 30 days	6 681	(28)	6 653	82 468	(769)	81 699	537	(152)	385
31 – 60 days	31	-	31	150	(2)	148	-	-	-
61 – 90 days	-	-	-	910	(1)	909	1 022	(891)	131
91 – 180 days	-	-	-	-	-	-	4 655	(4 187)	468
Over 180 days	-	-	-	-	-	-	33 199	(27 767)	5 432
	4 478 109	(24 316)	4 453 793	601 258	(12 124)	589 134	63 779	(45 291)	18 488

(Table continues on the next page)

4. Financial and operational risk management (continued)

December 2020 € '000	Stage 1 Gross amount	Stage 1 Impairment losses	Stage 1 Net amount	Stage 2 Gross amount	Stage 2 Impairment losses	Stage 2 Net amount	Stage 3 Gross amount	Stage 3 Impairment losses	Stage 3 Net amount
Financial assets at AC:									
Due from customers:									
Retail									
No delinquency	8 851 958	(9 235)	8 842 723	524 281	(30 649)	493 632	44 716	(14 669)	30 047
1 – 30 days	9 817	(314)	9 503	28 815	(4 007)	24 808	9 200	(3 422)	5 778
31 – 60 days	-	-	-	543	(100)	443	488	(310)	178
61 – 90 days	-	-	-	8 328	(1 556)	6 772	4 132	(1 481)	2 651
91 – 180 days	-	-	-	-	-	-	22 935	(11 336)	11 599
Over 180 days	-	-	-	-	-	-	221 169	(136 825)	84 344
	8 861 775	(9 549)	8 852 226	561 967	(36 312)	525 655	302 640	(168 043)	134 597
	13 466 086	(34 935)	13 431 151	1 189 942	(50 041)	1 139 901	366 419	(213 334)	153 085
	13 672 212	(35 641)	13 636 571	1 189 942	(50 041)	1 139 901	366 419	(213 334)	153 085
Financial assets at FVOCI – debt securities									
No delinquency	1 611 015	(306)	1 610 709	-	-	-	-	-	-
Financial commitments and contingencies									
No delinquency	4 767 567	(7 023)	4 760 544	94 192	(2 161)	92 031	17 229	(4 720)	12 509

4. Financial and operational risk management (continued)

4.1.4. Loans with renegotiated terms and forbearance policy

Loans with renegotiated terms are loans that have been restructured due to deterioration in the borrower's financial position, where the Bank has made concessions by agreeing to terms and conditions that are more favourable for the borrower than the Bank had provided initially. The revised terms usually include extending maturity, changing timing of interest payments and amendments to the terms of loan covenants. The Bank implements a forbearance policy in order to maximise collection opportunities and minimise the risk of default. Under the Bank's forbearance policy, an exposure is identified as forborne if both of these two conditions are satisfied:

- The Bank has identified financial difficulties that the debtor is facing or is about to face;
- The exposure has been subject to renegotiation or refinancing, granted in relation to the borrower's current financial difficulties or financial difficulties that would have occurred in the absence of the renegotiation or refinancing measures.

Both retail and corporate customers are subject to the forbearance policy:

June 2021 € '000	Performing forborne Gross amount	Performing forborne Impairment losses	Performing forborne Net amount	Non-performing forborne Gross amount	Non-performing forborne Impairment losses	Non-performing forborne Net amount
Financial assets at AC:						
Corporate	53 582	(3 493)	50 089	32 947	(22 925)	10 022
Retail	85 937	(4 703)	81 234	20 540	(11 691)	8 849
	139 519	(8 196)	131 323	53 487	(34 616)	18 871
Financial commitments and contin-gencies	1 507	(1)	1 506	3 600	(983)	2 617

December 2020 € '000	Performing forborne Gross amount	Performing forborne Impairment losses	Performing forborne Net amount	Non-performing forborne Gross amount	Non-performing forborne Impairment losses	Non-performing forborne Net amount
Financial assets at AC:						
Corporate	44 401	(841)	43 560	31 024	(23 665)	7 359
Retail	37 619	(1 525)	36 094	18 820	(10 361)	8 459
	82 020	(2 366)	79 654	49 844	(34 026)	15 818
Financial commitments and contin-gencies	1 270	(4)	1 266	4 200	(1 142)	3 058

4.1.5. Write-off Policy

The Bank writes off a loan or security balance when it determines that the loans or securities are uncollectible. In principle, the Bank considers the credit balances to be uncollectible based on the past due days (1 080 days past due). Credit balances may be written off only if the collateral has already been realized. Receivables subject to write-off are being collected by external collection agencies until they qualify for write-off.

The credit balance can be written off earlier than defined in the conditions described above if there is evidence that the receivable cannot be collected. The write-off of such receivables is subject to the approval of the Credit Risk Officer.

Financial assets that are written-off are subject of continuous enforcement process. The majority of such assets are subject of sale to third parties for the best offered prices.

The amount of loans written off during the year that are still subject to enforcement activity is € 15 349 thousand (31 December 2020: € 38 112 thousand).

4. Financial and operational risk management (continued)

4.1.6. Collateral Policy

The Bank's collateral policy is an integral and indispensable part of the credit risk management and credit risk mitigation for VUB Bank. Collateral is used primarily to provide the Bank with the means for repayment of an exposure in the event of the default of the borrower. The principal objective of the policy is to clearly set up rules for a common and standard set of collateral types used by the Bank in its lending activities. The rules, as the minimum, describe and state:

- Conditions for legal enforceability;
- Conditions for the process of valuation and the maximum values accepted by the Bank at the origination for specific types of collaterals; and
- Conditions for the process of revaluation.

However, collateral management has a wider meaning than the simple taking of collateral in order to secure the repayment of the Bank's exposures. This includes the following:

- The establishment and maintenance of a collateral policy defining the types of collateral taken by the Bank, the legal documentation used by the Bank to secure its right to this collateral in the event of default and the valuation of this collateral at origination. These aspects of collateral management are addressed in the internal policy document;
- The relevant and proper implementation and registration of collateral to secure the Bank's right to collateral in the event of default by the borrower;
- The regular monitoring and re-valuation of collateral held by the Bank during the life of the exposure;
- The analysis, monitoring and review of realization rates achieved by Recovery Department activities in order to assess the effectiveness of the collateral policy as a risk mitigant.

The Banks's decisions on the enforcement of collateral is individual and depends on factors such as the actual amount of the receivable, the current condition and value of the collateral, the length of the collateral realization period or collection related costs. The relevant competent body of the Bank decides which collateral instrument will be used.

The Bank mainly uses the following means of enforcement of collateral:

- Voluntary auction,
- Foreclosure procedure,
- Realization of the collateral for the receivable in a bankruptcy procedure,
- Sale of receivables including collateral.

The Bank holds collateral and other credit enhancements against certain of its credit exposures. The collateral against loans and advances to customers is held in the form of mortgage interests over property, other registered securities over assets, and guarantees. Estimates of fair value are based on the value of collateral assessed at the time of borrowing and the Bank updates the fair value on a regular basis.

The Bank mitigates the credit risk of derivatives, reverse sale and repurchase agreements by entering into master netting agreements and holding collateral in the form of cash and marketable securities. Derivative transactions are either transacted on an exchange or entered into under International Swaps and Derivatives Association ('ISDA') master netting agreements. Under ISDA master netting agreements in certain circumstances, e.g. when a credit event such as a default occurs, all outstanding transactions under the agreement are terminated, the termination value is assessed and only a single net amount is due or payable in settlement of all transactions.

4. Financial and operational risk management (continued)

4.1.7. Offsetting financial assets and financial liabilities

Offsetting financial assets and financial liabilities relates to financial assets and financial liabilities that are:

- Offset in the statement of financial position; or
- Subject to an enforceable master netting arrangement or similar agreement that covers similar financial instruments, irrespective of whether they are offset in the statement of financial position.

In general, the similar agreements include derivative clearing agreements, global master repurchase agreements, and global master securities lending agreements. Similar financial instruments include derivatives, sales and repurchase agreements, reverse sale and repurchase agreements, and securities borrowing and lending agreements. Financial instruments such as loans and deposits are not disclosed in the tables below unless they are offset in the statement of financial position.

The ISDA and similar master netting arrangements do not meet the criteria for offsetting in the statement of financial position. This is because they create for the parties to the agreement a right of set-off of recognized amounts that is enforceable only following an event of default, insolvency or bankruptcy of the Bank or the counterparties or following other predetermined events. In addition, the Bank and its counterparties do not intend to settle on a net basis or to realize the assets and settle the liabilities simultaneously.

The Bank receives and gives collateral in the form of cash and marketable securities in respect of the following transactions:

- Derivatives,
- Sale and repurchase, and reverse sale and repurchase agreements.

Such collateral is subject to standard industry terms including, when appropriate, an ISDA Credit Support Annex and Global Master Repurchase Agreement (‘GMRA’). This means that securities received or given as collateral can be pledged or sold during the term of the transaction but have to be returned on maturity of the transaction. The terms also give each party the right to terminate the related transactions on the counterparty’s failure to post collateral.

4. Financial and operational risk management (continued)

4.1.8. Concentrations of credit risk

The Bank monitors concentrations of credit risk by geographic location. An analysis of concentrations of credit risk at the reporting date is shown below.

June 2021 **€ '000**	**Gross amount**	**Impairment losses/ provisions**	**Net amount**
Slovakia			
Financial assets at AC:			
Due from customers:			
Public administration	205 956	(2 254)	203 702
Corporate	3 384 309	(82 114)	3 302 195
Retail	9 972 519	(199 166)	9 773 353
	13 562 784	(283 534)	13 279 250
Financial assets at FVOCI - debt securities	421 179	(50)	421 129
Financial commitments and contingencies	4 200 562	(13 112)	4 187 450
Czech republic			
Financial assets at AC:			
Due from other banks	14	-	14
Due from customers:	-	-	-
Corporate	849 547	(2 533)	847 014
Retail	20 376	(1 778)	18 598
	869 923	(4 311)	865 612
	869 937	(4 311)	865 626
Financial commitments and contingencies	1 291 974	(828)	1 291 146
Other European countries			
Financial assets at AC:			
Due from other banks	112 320	(63)	112 257
Due from customers:			
Corporate	1 083 340	(1 941)	1 081 399
Retail	94 333	(634)	93 699
	1 177 673	(2 575)	1 175 098
	1 289 993	(2 638)	1 287 355
Financial assets at FVOCI - debt securities	813 595	(242)	813 353
Financial commitments and contingencies	677 225	(760)	676 465

(Table continues on the next page)

4. Financial and operational risk management (continued)

June 2021 **€ '000**	**Gross amount**	**Impairment losses/ provisions**	**Net amount**
North America			
Financial assets at AC:			
Due from customers:			
Corporate	8 424	(3)	8 421
Retail	1 855	(3)	1 852
	10 279	(6)	10 273
Financial assets at FVOCI - debt securities	100 254	(20)	100 234
Financial commitments and contingencies	278	-	278
Asia			
Financial assets at AC:			
Due from other banks	8 346	(1)	8 345
Due from customers:			
Retail	10 443	(48)	10 395
	18 789	(49)	18 740
Financial commitments and contingencies	42 318	(49)	42 269
Rest of the World			
Financial assets at AC:			
Due from other banks	77 162	(143)	77 019
Due from customers:			
Public administration	33 740	(1)	33 739
Corporate	22	-	22
Retail	2 884	(9)	2 875
	36 646	(10)	36 636
	113 808	(153)	113 655
Financial commitments and contingencies	1 005	-	1 005

4. Financial and operational risk management (continued)

December 2020 **€ '000**	**Gross amount**	**Impairment losses/ provisions**	**Net amount**
Slovakia			
Financial assets at AC:			
Due from customers:			
Public administration	115 144	(2 672)	112 472
Corporate	3 355 691	(75 904)	3 279 787
Retail	9 611 318	(211 325)	9 399 993
	13 082 153	(289 901)	12 792 252
Financial assets at FVOCI - debt securities	714 975	(69)	714 906
Financial commitments and contingencies	3 803 157	(13 169)	3 789 988
Czech republic			
Financial assets at AC:			
Due from customers:			
Corporate	599 239	(2 150)	597 089
Retail	19 608	(1 848)	17 760
	618 847	(3 998)	614 849
Financial commitments and contingencies	610 029	(365)	609 664
Other European countries			
Financial assets at AC:			
Due from other banks	116 486	(235)	116 251
Due from customers:			
Public administration	5 090	-	5 090
Corporate	1 180 008	(3 674)	1 176 334
Retail	82 928	(648)	82 280
	1 268 026	(4 322)	1 263 704
	1 384 512	(4 557)	1 379 955
Financial assets at FVOCI - debt securities	794 938	(213)	794 725
Financial commitments and contingencies	420 596	(243)	420 353

(Table continues on the next page)

4. Financial and operational risk management (continued)

December 2020 € '000	Gross amount	Impairment losses/ provisions	Net amount
North America			
Financial assets at AC:			
Due from customers:			
Corporate	8 159	(3)	8 156
Retail	1 533	(3)	1 530
	9 692	(6)	9 686
Financial assets at FVOCI - debt securities	101 102	(24)	101 078
Financial commitments and contingencies	79	-	79
Asia			
Financial assets at AC:			
Due from other banks	12 672	(5)	12 667
Due from customers:			
Retail	8 476	(75)	8 401
	21 148	(80)	21 068
Financial commitments and contingencies	42 714	(123)	42 591
Rest of the World			
Financial assets at AC:			
Due from other banks	76 968	(466)	76 502
Due from customers:			
Public administration	32 685	(3)	32 682
Corporate	49	-	49
Retail	2 519	(5)	2 514
	35 253	(8)	35 245
	112 221	(474)	111 747
Financial commitments and contingencies	2 413	(4)	2 409

4. Financial and operational risk management (continued)

An analysis of exposures based on the carrying amounts by industry sector is shown in the table below.

June 2021 € '000	**Financial assets at AC:**				**Financial assets at FVOCI - debt securities**	**Financial commit-ments and contin-gencies**
	Banks	**Public admini-stration**	**Corporate**	**Retail***		
Agriculture, forestry and fishing	-	-	175 399	24 712	-	106 292
Mining and quarrying	-	-	47 795	110	-	35 798
Manufacturing	-	-	814 057	32 708	-	839 790
Electricity, gas, steam and air conditioning supply	-	-	607 061	692	-	623 881
Water supply	-	-	74 189	2 059	-	23 468
Construction	-	-	264 639	34 468	-	655 729
Wholesale and retail trade	-	-	926 150	73 545	-	544 132
Transport and storage	-	-	356 217	14 490	-	328 140
Accommodation and food service activities	-	-	32 930	12 219	-	5 285
Information and communication	-	-	116 068	7 351	-	75 049
Financial and insurance activities**	197 635	-	556 787	442	356 895	1 380 494
Real estate activities	-	-	542 310	53 405	-	199 977
Professional, scientific and technical activities	-	-	189 190	23 546	-	180 195
Administrative and support service activities	-	-	130 714	7 348	-	21 062
Public administration and defense, compulsory social security	-	237 441	634	149	977 821	173 475
Education	-	-	367	827	-	384
Human health services and social work activities	-	-	5 873	21 157	-	6 965
Arts, entertainment and recreation	-	-	27 341	1 193	-	673
Other services	-	-	371 330	4 620	-	73 847
Consumer Loans	-	-	-	1 389 586	-	299 491
Mortgage Loans	-	-	-	8 196 145	-	624 486
	197 635	237 441	5 239 051	9 900 772	1 334 716	6 198 613

4. Financial and operational risk management (continued)

December 2020 € '000	Financial assets at AC:				Financial assets at FVOCI - debt securities	Financial commit-ments and contin-gencies
	Banks	Public admini-stration	Corporate	Retail*		
Agriculture, forestry and fishing	-	-	163 424	19 593	-	101 518
Mining and quarrying	-	-	43 174	322	-	36 378
Manufacturing	-	-	794 002	30 138	-	736 817
Electricity, gas, steam and air conditioning supply	-	-	584 421	648	-	663 704
Water supply	-	-	75 704	2 170	-	23 664
Construction	-	-	228 499	30 201	-	541 115
Wholesale and retail trade	-	-	870 671	68 864	-	446 117
Transport and storage	-	-	283 898	13 855	-	303 526
Accommodation and food service activities	-	-	32 500	13 063	-	6 071
Information and communication	-	-	110 245	7 162	-	59 125
Financial and insurance activities**	205 420	-	583 339	369	338 715	657 569
Real estate activities	-	-	525 585	53 017	-	151 492
Professional, scientific and technical activities	-	-	176 970	22 019	-	170 572
Administrative and support service activities	-	-	199 107	5 809	-	15 973
Public administration and defense, compulsory social security	-	150 242	386	169	1 271 994	29 262
Education	-	2	367	906	-	301
Human health services and social work activities	-	-	40 627	19 447	-	10 081
Arts, entertainment and recreation	-	-	27 403	1 561	-	477
Other services	-	-	321 093	3 678	-	64 912
Consumer Loans	-	-	-	1 413 794	-	301 467
Mortgage Loans	-	-	-	7 805 693	-	544 943
	205 420	150 244	5 061 415	9 512 478	1 610 709	4 865 084

* 'Retail' includes Small Business and Flat Owners Associations.

** 'Financial and insurance activities' involves financial services, leasing and insurance.

4. Financial and operational risk management (continued)

4.1.9. Internal and external ratings

The overview of the internal rating scales according to the risk profile applicable for the corporate exposures, the public sector exposures and the retail exposures from small business and flat owners associations is shown below.

Risk Profile	Description
Very Low	Good quality of assets, strong market penetration, steady activity, proven distinctive managerial skills, broad debt coverage capacity.
Low	Satisfactory quality and chargeability of assets, market penetration and managerial quality on the average; well set solvency, capital structure and debt composition; above average debt coverage capacity.
Lower – Intermediate	Acceptable quality and chargeability of available assets, even if with a not negligible degree of risk; well-balanced solvency, capital structure and debt composition with slight liquidity surplus and weaker debt coverage capacity.
Intermediate	Acceptable quality and chargeability of available assets even if with a significant degree of risk; vulnerable margin at times, capital structure and debt composition that show worsening signals; low level of liquidity and short debt coverage margin.
Upper – Intermediate	Still acceptable asset quality even if with possible liquidity stress; high level of gearing; managerial weakness, little market penetration and positioning; margins and competitiveness under pressure.
High	In addition to riskiness features for Upper – Intermediate profile, there are evident difficulties as well as problematic debt management.
Default	A default is considered to have occurred with regard to a particular obligor when either or both of the two following events have taken place: • the obligor is past due more than 90 days (Days past due methodology) on any material credit obligation to the Bank, the Parent Company undertaking or any of its subsidiaries; • the Bank considers that the obligor is unlikely to pay its credit obligations to the banking group in full, without recourse by the Bank to actions such as realizing security (if held).

Specialized Lending comprises of rating segments SPV and RED. For Specialized Lending the Slotting approach is used by the Bank. Clients are assigned into five slotting categories based on a qualitative valuation and information about the risk of default. Risk weights and expected loss used for the capital requirement calculation are also defined for each category. Categories are predefined by the Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms (‘CRR’) and internally, the categories used are as follows:

Specialized Lending – SPV and RED
- Strong
- Good
- Satisfactory
- Weak
- Default

4. Financial and operational risk management (continued)

For mortgages and unsecured retail, the retail segment incorporates many individually insignificant exposures with various characteristics, therefore the description of ratings correlates with these risk profiles.

Risk Profile	Description
Very Low	High level of client's socio-demographic information and financial discipline.
Low	Above average level of client's socio-demographic information and financial discipline.
Lower – Intermediate	Acceptable level of client's socio-demographic information and financial discipline.
Intermediate	Acceptable level of client's socio-demographic information and financial discipline, but there are some signals of worsening credit quality.
Upper – Intermediate	Acceptable level of client's socio-demographic information and financial discipline, but there is worsening credit quality.
High	Acceptable level of client's socio-demographic information and financial discipline, but there is negative credit behaviour.
Default	A default is considered to have occurred with regard to a particular mortgage/obligor when either or both of the two following events have taken place: • The obligor is past due more than 90 days (Days past due methodology) on any material credit obligation to the Bank (absolute threshold is set according to NBS directive); • The Bank considers that the obligor is unlikely to pay its credit obligations to the banking group in full, without recourse by the Bank to actions such as realizing security (if held).

In the segments of the Single Resolution Fund, public sector entities and factoring, the bank does not assign an internal rating to the client.

Capital requirement calculation

The Bank generally uses the standardised approach for the calculation of the capital requirements. However, for the calculation of the credit and counterparty risk capital requirements, the Bank, having received authorisation from the Supervisory Authority NBS, uses the Advanced IRB approach for its portfolio of residential mortgages from July 2012 and for the Corporate segment, Small and Medium size enterprises (SME) and for Retail Small Business from June 2014. The Foundation IRB approach is used for corporate exposures where a LGD is not available, but they are assigned according to regulation. Simple IRB approach is used for equity exposures and methodology for this capital requirement is in line with Article 155 of the CRR Regulation. The Bank is also proceeding with the development of rating models for other segments, to which the standard methods are currently applied, and also with the extension of the scope to subsidiaries in accordance with the gradual rollout plan for the advanced approaches presented to the Supervisory Authority.

4. Financial and operational risk management (continued)

The following table shows the quality of the Bank's **stage 1** credit portfolio in terms of internal ratings:

June 2021 **€ '000**	**Risk Profile**	**Gross amount**	**Impairment losses**	**Net amount**
Stage 1				
Financial assets at AC:				
Due from other banks				
	Very Low	5 696	-	5 696
	Low	50 204	(24)	50 180
	Lower-Intermediate	89 185	(144)	89 041
	Unrated	51 531	-	51 531
		196 616	(168)	196 448
Due from customers:				
Public administration				
	Very Low	95 574	(19)	95 555
	Low	1 577	-	1 577
	Intermediate	17 545	(11)	17 534
	Upper-Intermediate	31 434	(85)	31 349
	High	6 564	(224)	6 340
	Unrated	57 881	(654)	57 227
		210 575	(993)	209 582
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Very Low	491 902	(73)	491 829
	Low	1 505 734	(626)	1 505 108
	Lower-Intermediate	1 032 978	(886)	1 032 092
	Intermediate	551 591	(1 025)	550 566
	Upper-Intermediate	249 318	(1 052)	248 266
	High	17 722	(297)	17 425
	Unrated	184 245	(128)	184 117
Specialized Lending - SPV, RED				
	Strong	204 732	(1 398)	203 334
	Good	317 283	(4 085)	313 198
	Satisfactory	269 399	(13 087)	256 312
	Weak	43 921	(4 975)	38 946
		4 868 825	(27 632)	4 841 193

(Table continues on the next page)

4. Financial and operational risk management (continued)

June 2021 € '000	Risk Profile	Gross amount	Impairment losses	Net amount
Stage 1				
Financial assets at AC:				
Due from customers:				
Retail				
Small Business, Flat Owners Associations				
	Very Low	19 606	(9)	19 597
	Low	29 445	(36)	29 409
	Lower-Intermediate	49 657	(128)	49 529
	Intermediate	115 035	(537)	114 498
	Upper-Intermediate	30 545	(375)	30 170
	High	1 403	(156)	1 247
Mortgages				
	Very Low	7 336 418	(493)	7 335 925
	Lower-Intermediate	551 582	(416)	551 166
	Intermediate	6 788	(38)	6 750
	High	2 603	(80)	2 523
	Unrated	7 717	-	7 717
Unsecured Retail				
	Very Low	364 368	(396)	363 972
	Low	109 705	(225)	109 480
	Lower-Intermediate	451 483	(2 034)	449 449
	Intermediate	76 453	(1 303)	75 150
	Upper-Intermediate	29 469	(1 643)	27 826
	High	4 444	(734)	3 710
	Unrated	93 002	18	93 020
		9 279 723	(8 585)	9 271 138
		14 359 123	(37 210)	14 321 913
Financial assets at FVOCI - debt securities				
	Unrated	1 335 028	(312)	1 334 716

(Table continues on the next page)

4. Financial and operational risk management (continued)

June 2021 € '000	Risk Profile	Gross amount	Provisions	Net amount
Stage 1				
Financial commitments and contingencies:				
Due from other banks				
	Very Low	5 962	-	5 962
	Lower-Intermediate	234 788	(26)	234 762
	Unrated	383 777	-	383 777
		624 527	(26)	624 501
Due from customers:				
Public administration				
	Very Low	140 733	(434)	140 299
	Low	544	-	544
	Intermediate	4 429	(1)	4 428
	Upper-Intermediate	22 555	(16)	22 539
	High	3 523	(41)	3 482
	Unrated	58	-	58
		171 842	(492)	171 350
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Very Low	1 040 038	(82)	1 039 956
	Low	1 594 755	(61)	1 594 694
	Lower-Intermediate	739 526	(275)	739 251
	Intermediate	256 038	(378)	255 660
	Upper-Intermediate	119 691	(546)	119 145
	High	36 393	(426)	35 967
	Unrated	223 361	(630)	222 731
Specialized Lending - SPV, RED				
	Good	95 376	(512)	94 864
	Satisfactory	88 718	(1 143)	87 575
	Weak	31 602	(1 184)	30 418
	Default	710	(57)	653
		4 226 208	(5 294)	4 220 914
Retail				
	Very Low	772 523	(96)	772 427
	Low	30 107	(15)	30 092
	Lower-Intermediate	161 278	(270)	161 008
	Intermediate	17 414	(58)	17 356
	Upper-Intermediate	6 721	(82)	6 639
	High	206	(29)	177
	Unrated	877	-	877
		989 126	(550)	988 576
		5 387 176	(6 336)	5 380 840

4. Financial and operational risk management (continued)

December 2020 **€ '000**	**Risk Profile**	**Gross amount**	**Impairment losses**	**Net amount**
Stage 1				
Financial assets at AC:				
Due from other banks				
	Very Low	10 307	-	10 307
	Low	50 353	(65)	50 288
	Lower-Intermediate	144 414	(614)	143 800
	Upper-Intermediate	1 052	(27)	1 025
		206 126	(706)	205 420
Due from customers:				
Public administration				
	Very low	1 201	-	1 201
	Low	697	-	697
	Intermediate	18 709	(12)	18 697
	Upper-Intermediate	91 883	(749)	91 134
	High	8 622	(309)	8 313
	Unrated	5 090	-	5 090
		126 202	(1 070)	125 132
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Very Low	454 164	(56)	454 108
	Low	1 481 295	(617)	1 480 678
	Lower-Intermediate	993 224	(852)	992 372
	Intermediate	399 792	(594)	399 198
	Upper-Intermediate	237 066	(822)	236 244
	High	12 847	(260)	12 587
	Unrated	73 332	(64)	73 268
Specialized Lending - SPV, RED				
	Strong	353 997	(2 488)	351 509
	Good	209 956	(2 932)	207 024
	Satisfactory	231 478	(11 095)	220 383
	Weak	30 957	(4 535)	26 422
		4 478 108	(24 315)	4 453 793

(Table continues on the next page)

4. Financial and operational risk management (continued)

December 2020 € '000	Risk Profile	Gross amount	Impairment losses	Net amount
Stage 1				
Financial assets at AC:				
Due from customers:				
Retail				
Small Business, Flat Owners Associations				
	Very Low	19 928	(9)	19 919
	Low	27 423	(34)	27 389
	Lower-Intermediate	43 554	(87)	43 467
	Intermediate	104 239	(490)	103 749
	Upper-Intermediate	31 155	(407)	30 748
	High	1 191	(170)	1 021
Mortgages				
	Very Low	6 944 903	(489)	6 944 414
	Low	298 060	(121)	297 939
	Lower-Intermediate	252 350	(298)	252 052
	Intermediate	6 666	(40)	6 626
	High	3 006	(86)	2 920
Unsecured Retail				
	Very Low	344 523	(390)	344 133
	Low	110 989	(239)	110 750
	Lower-Intermediate	539 197	(2 331)	536 866
	Intermediate	89 755	(1 106)	88 649
	Upper-Intermediate	39 267	(2 338)	36 929
	High	5 570	(914)	4 656
		8 861 776	(9 549)	8 852 227
		13 466 086	(34 934)	13 431 152
Financial assets at FVOCI - debt securities				
	Unrated	1 611 015	(306)	1 610 709

(Table continues on the next page)

4. Financial and operational risk management (continued)

December 2020 € '000	Risk Profile	Gross amount	Provisions	Net amount
Stage 1				
Financial commitments and contingencies:				
Due from other banks				
	Very Low	6 073	(1)	6 072
	Lower-Intermediate	46 412	(64)	46 348
		52 485	(65)	52 420
Due from customers:				
Public administration				
	Very Low	26	-	26
	Low	1 134	-	1 134
	Intermediate	3 787	(1)	3 786
	Upper - Intermediate	21 461	(14)	21 447
	High	2 130	(32)	2 098
		28 538	(47)	28 491
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Very Low	828 058	(81)	827 977
	Low	1 534 477	(683)	1 533 794
	Lower-Intermediate	698 540	(252)	698 288
	Intermediate	339 206	(921)	338 285
	Upper - Intermediate	98 775	(462)	98 313
	High	14 038	(302)	13 736
	Unrated	3 240	(52)	3 188
Specialized Lending - SPV, RED				
	Strong	100 517	(542)	99 975
	Good	102 957	(1 100)	101 857
	Satisfactory	53 487	(2 027)	51 460
	Weak	31	-	31
		3 773 326	(6 422)	3 766 904
Retail				
	Very Low	575 071	(89)	574 982
	Low	172 316	(19)	172 297
	Lower-Intermediate	140 995	(197)	140 798
	Intermediate	19 428	(69)	19 359
	Upper-Intermediate	4 898	(69)	4 829
	High	510	(46)	464
		913 218	(489)	912 729
		4 715 082	(6 958)	4 708 124

4. Financial and operational risk management (continued)

The following table shows the quality of the Bank's stage 2 credit portfolio in terms of internal ratings:

June 2021 **€ '000**	**Risk Profile**	**Gross amount**	**Impairment losses**	**Net amount**
Stage 2				
Financial assets at AC:				
Due from other banks	Very Low	349	-	349
	Upper-Intermediate	877	(39)	838
		1 226	(39)	1 187
Due from customers:				
Public administration				
	Intermediate	3 206	(11)	3 195
	Upper-Intermediate	13 458	(266)	13 192
	High	12 297	(975)	11 322
	Unrated	160	(10)	150
		29 121	(1 262)	27 859
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Low	82 528	(40)	82 488
	Lower-Intermediate	26 687	(183)	26 504
	Intermediate	52 957	(241)	52 716
	Upper-Intermediate	124 244	(1 588)	122 656
	High	32 243	(1 237)	31 006
	Unrated	1 132	(23)	1 109
Specialized Lending - SPV, RED				
	Good	24 648	(1 751)	22 897
	Satisfactory	18 478	(1 937)	16 541
	Weak	23 676	(5 443)	18 233
		386 593	(12 443)	374 150

(Table continues on the next page)

4. Financial and operational risk management (continued)

June 2021 € '000	Risk Profile	Gross amount	Impairment losses	Net amount
Stage 2				
Financial assets at AC:				
Due from customers:				
Retail				
Small Business, Flat Owners Associations				
	Very Low	21	-	21
	Low	246	(7)	239
	Lower-Intermediate	3 940	(65)	3 875
	Intermediate	20 081	(483)	19 598
	Upper-Intermediate	38 015	(1 988)	36 027
	High	7 981	(1 109)	6 872
Mortgages				
	Very Low	31 925	(219)	31 706
	Lower-Intermediate	119 415	(1 728)	117 687
	Intermediate	47 882	(1 334)	46 548
	High	49 611	(3 263)	46 348
Unsecured Retail				
	Very Low	1 565	(9)	1 556
	Low	1 044	(12)	1 032
	Lower-Intermediate	55 823	(1 282)	54 541
	Intermediate	51 022	(2 587)	48 435
	Upper-Intermediate	57 072	(5 464)	51 608
	High	57 357	(12 829)	44 528
		543 000	(32 379)	510 621
		958 714	(46 084)	912 630

(Table continues on the next page)

4. Financial and operational risk management (continued)

June 2021 **€ '000**	**Risk profile**	**Gross amount**	**Provisions**	**Net amount**
Stage 2				
Financial commitments and contingencies:				
Due from customers:				
Public administration				
	Intermediate	226	(1)	225
	Upper-Intermediate	421	(2)	419
	High	900	(5)	895
		1 547	(8)	1 539
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Very Low	6 425	(2)	6 423
	Low	4 022	(2)	4 020
	Lower-Intermediate	4 609	(8)	4 601
	Intermediate	111 630	(772)	110 858
	Upper-Intermediate	28 734	(448)	28 286
	High	5 985	(350)	5 635
Specialized Lending - SPV, RED				
	Satisfactory	3 412	(590)	2 822
		164 817	(2 172)	162 645
Retail				
	Very Low	271	(7)	264
	Low	15	-	15
	Lower-Intermediate	9 112	(286)	8 826
	Intermediate	2 298	(87)	2 211
	Upper-Intermediate	2 796	(271)	2 525
	High	1 954	(469)	1 485
		16 446	(1 120)	15 326
		182 810	(3 300)	179 510

4. Financial and operational risk management (continued)

December 2020 **€ '000**	**Risk Profile**	**Gross amount**	**Impairment losses**	**Net amount**
Stage 2				
Financial assets at AC:				
Due from customers:				
Public administration				
	Very low	3 487	(10)	3 477
	Upper-Intermediate	6 629	(190)	6 439
	High	16 601	(1 405)	15 196
		26 717	(1 605)	25 112
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Low	85 597	(77)	85 520
	Lower-Intermediate	15 256	(52)	15 204
	Intermediate	68 112	(362)	67 750
	Upper-Intermediate	314 847	(2 125)	312 722
	High	54 355	(1 600)	52 755
	Unrated	2 594	(5)	2 589
Specialized Lending - SPV, RED				
	Strong	3 367	(2)	3 365
	Good	16 126	(2 007)	14 119
	Satisfactory	28 189	(1 911)	26 278
	Weak	12 816	(3 984)	8 832
		601 259	(12 125)	589 134

(Table continues on the next page)

4. Financial and operational risk management (continued)

December 2020 **€ '000**	**Risk Profile**	**Gross amount**	**Impairment losses**	**Net amount**
Stage 2				
Financial assets at AC:				
Due from customers:				
Retail				
Small Business, Flat Owners Associations				
	Very Low	1	-	1
	Low	48	-	48
	Lower-Intermediate	4 196	(212)	3 984
	Intermediate	20 103	(476)	19 627
	Upper - Intermediate	34 030	(1 612)	32 418
	High	7 834	(1 106)	6 728
Mortgages				
	Very Low	15 420	(75)	15 345
	Low	5 075	(37)	5 038
	Lower-Intermediate	124 083	(2 056)	122 027
	Intermediate	54 327	(1 515)	52 812
	High	53 804	(3 596)	50 208
Unsecured Retail				
	Very Low	1 253	(9)	1 244
	Low	777	(9)	768
	Lower-Intermediate	60 038	(1 603)	58 435
	Intermediate	56 596	(3 242)	53 354
	Upper-Intermediate	65 496	(6 986)	58 510
	High	58 885	(13 778)	45 107
		561 966	(36 312)	525 654
		1 189 942	(50 042)	1 139 900

(Table continues on the next page)

4. Financial and operational risk management (continued)

December 2020 € '000	Risk profile	Gross amount	Provisions	Net amount
Stage 2				
Financial commitments and contingencies:				
Due from customers:				
Public administration				
	Intermediate	226	(1)	225
	High	202	(4)	198
		428	(5)	423
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Very Low	6 769	(7)	6 762
	Low	586	-	586
	Lower-Intermediate	3 184	(7)	3 177
	Intermediate	43 124	(130)	42 994
	Upper-Intermediate	15 378	(401)	14 977
	High	5 967	(178)	5 789
Specialized Lending - SPV, RED				
	Satisfactory	3 425	(591)	2 834
		78 433	(1 314)	77 119
Retail				
	Very Low	448	(13)	435
	Low	624	(6)	618
	Lower-Intermediate	6 984	(158)	6 826
	Intermediate	2 887	(92)	2 795
	Upper-Intermediate	2 005	(158)	1 847
	High	2 383	(415)	1 968
		15 331	(842)	14 489
		94 192	(2 161)	92 031

4. Financial and operational risk management (continued)

The following table shows the quality of the Bank's stage 3 credit portfolio in terms of internal ratings:

June 2021 **€ '000**	**Risk Profile**	**Gross amount**	**Impairment losses/ provisions**	**Net amount**
Stage 3				
Financial assets at AC:				
Due from customers:				
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring	Default	65 815	(42 476)	23 339
Specialized Lending - SPV, RED	Default	4 409	(4 040)	369
		70 224	(46 516)	23 708
Retail				
Small Business, Flat Owners Associations	Default	14 017	(10 058)	3 959
Mortgages	Default	86 560	(36 784)	49 776
Unsecured Retail	Default	179 110	(113 832)	65 278
		179 110	(113 832)	65 278
		179 110	(113 832)	65 278
Financial commitments and contingencies:				
Due from customers:				
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring	Default	13 975	(3 784)	10 191
Retail	Default	4 874	(1 303)	3 571
		18 849	(5 087)	13 762

4. Financial and operational risk management (continued)

December 2020 **€ '000**	**Risk Profile**	**Gross amount**	**Impairment losses/ provisions**	**Net amount**
Stage 3				
Financial assets at AC:				
Due from customers:				
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring	Default	58 971	(40 503)	18 468
Specialized Lending - SPV, RED	Default	4 808	(4 788)	20
		63 779	(45 291)	18 488
Retail				
Small Business, Flat Owners Associations	Default	13 620	(9 728)	3 892
Mortgages	Default	89 647	(33 335)	56 312
Unsecured Retail	Default	199 373	(124 980)	74 393
		302 640	(168 043)	134 597
		366 419	(213 334)	153 085
Financial commitments and contingencies:				
Due from customers:				
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring	Default	11 432	(3 150)	8 282
Specialized Lending - SPV, RED	Default	229	(221)	8
		11 661	(3 371)	8 290
Retail	Default	5 568	(1 349)	4 219
		17 229	(4 720)	12 509

4. Financial and operational risk management (continued)

The following table shows the quality of the Bank's total credit portfolio in terms of internal ratings:

June 2021 **€ '000**	**Risk Profile**	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at AC:				
Due from other banks				
	Very Low	6 045	-	6 045
	Low	50 204	(24)	50 180
	Lower-Intermediate	89 185	(144)	89 041
	Upper-Intermediate	877	(39)	838
	Unrated	51 531	-	51 531
		197 842	(207)	197 635
Due from customers:				
Public administration				
	Very Low	95 574	(19)	95 555
	Low	1 577	-	1 577
	Intermediate	20 751	(22)	20 729
	Upper-Intermediate	44 892	(351)	44 541
	High	18 861	(1 199)	17 662
	Unrated	58 041	(664)	57 377
		239 696	(2 255)	237 441
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Very Low	491 902	(73)	491 829
	Low	1 588 262	(666)	1 587 596
	Lower-Intermediate	1 059 665	(1 069)	1 058 596
	Intermediate	604 548	(1 266)	603 282
	Upper-Intermediate	373 562	(2 640)	370 922
	High	49 965	(1 534)	48 431
	Default	65 815	(42 476)	23 339
	Unrated	185 377	(151)	185 226
Specialized Lending - SPV, RED				
	Strong	204 732	(1 398)	203 334
	Good	341 931	(5 836)	336 095
	Satisfactory	287 877	(15 024)	272 853
	Weak	67 597	(10 418)	57 179
	Default	4 409	(4 040)	369
		5 325 642	(86 591)	5 239 051

(Table continues on the next page)

4. Financial and operational risk management (continued)

June 2021 € '000	Risk Profile	Gross amount	Impairment losses	Net amount
Financial assets at AC:				
Due from customers:				
Retail				
Small Business, Flat Owners Associations				
	Very Low	19 627	(9)	19 618
	Low	29 691	(43)	29 648
	Lower-Intermediate	53 597	(193)	53 404
	Intermediate	135 116	(1 020)	134 096
	Upper-Intermediate	68 560	(2 363)	66 197
	High	9 384	(1 265)	8 119
	Default	14 017	(10 058)	3 959
Mortgages				
	Very Low	7 368 343	(712)	7 367 631
	Lower-Intermediate	670 997	(2 144)	668 853
	Intermediate	54 670	(1 372)	53 298
	High	52 214	(3 343)	48 871
	Default	86 560	(36 784)	49 776
	Unrated	7 717	-	7 717
Unsecured Retail				
	Very Low	365 933	(405)	365 528
	Low	110 749	(237)	110 512
	Lower-Intermediate	507 306	(3 316)	503 990
	Intermediate	127 475	(3 890)	123 585
	Upper-Intermediate	86 541	(7 107)	79 434
	High	61 801	(13 563)	48 238
	Default	179 110	(113 832)	65 278
	Unrated	93 002	18	93 020
		10 102 410	(201 638)	9 900 772
		15 667 748	(290 484)	15 377 264
Financial assets at FVOCI - debt securities				
	Unrated	1 335 028	(312)	1 334 716

(Table continues on the next page)

4. Financial and operational risk management (continued)

June 2021 € '000	Risk Profile	Gross amount	Provisions	Net amount
Financial commitments and contingencies:				
Due from other banks				
	Very Low	5 962	-	5 962
	Lower-Intermediate	234 788	(26)	234 762
	Unrated	383 777	-	383 777
		624 527	(26)	624 501
Due from customers:				
Public administration				
	Very Low	140 733	(434)	140 299
	Low	544	-	544
	Intermediate	4 655	(2)	4 653
	Upper-Intermediate	22 976	(18)	22 958
	High	4 423	(46)	4 377
	Unrated	58	-	58
		173 389	(500)	172 889
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Very Low	1 046 463	(84)	1 046 379
	Low	1 598 777	(63)	1 598 714
	Lower-Intermediate	744 135	(283)	743 852
	Intermediate	367 668	(1 150)	366 518
	Upper-Intermediate	148 425	(994)	147 431
	High	42 378	(776)	41 602
	Default	13 975	(3 784)	10 191
	Unrated	223 361	(630)	222 731
Specialized Lending - SPV, RED				
	Good	95 376	(512)	94 864
	Satisfactory	92 130	(1 733)	90 397
	Weak	31 602	(1 184)	30 418
	Default	710	(57)	653
		4 405 000	(11 250)	4 393 750
Retail				
	Very Low	772 794	(103)	772 691
	Low	30 122	(15)	30 107
	Lower-Intermediate	170 390	(556)	169 834
	Intermediate	19 712	(145)	19 567
	Upper-Intermediate	9 517	(353)	9 164
	High	2 160	(498)	1 662
	Default	4 874	(1 303)	3 571
	Unrated	877	-	877
		1 010 446	(2 973)	1 007 473
		5 588 835	(14 723)	5 574 112

4. Financial and operational risk management (continued)

December 2020 € '000	Risk Profile	Gross amount	Impairment losses	Net amount
Financial assets at AC:				
Due from other banks				
	Very Low	10 307	-	10 307
	Low	50 353	(65)	50 288
	Lower-Intermediate	144 414	(614)	143 800
	Upper-Intermediate	1 052	(27)	1 025
		206 126	(706)	205 420
Due from customers:				
Public administration				
	Very Low	1 735	(1)	1 734
	Low	697	-	697
	Intermediate	21 662	(21)	21 641
	Upper-Intermediate	98 512	(757)	97 573
	High	25 223	(1 714)	23 509
	Unrated	5 090	-	5 090
		152 919	(2 675)	150 244
Corporate				
Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Very Low	454 164	(56)	454 108
	Low	1 566 892	(694)	1 566 198
	Lower-Intermediate	1 008 480	(904)	1 007 576
	Intermediate	467 904	(956)	466 948
	Upper-Intermediate	551 913	(2 947)	548 966
	High	67 202	(1 860)	65 342
	Default	58 971	(40 503)	18 468
	Unrated	75 926	(69)	75 857
Specialized Lending - SPV, RED				
	Strong	357 364	(2 490)	354 874
	Good	226 082	(4 939)	221 143
	Satisfactory	259 667	(13 006)	246 661
	Weak	43 773	(8 519)	35 254
	Default	4 808	(4 788)	20
		5 143 146	(81 731)	5 061 415

(Table continues on the next page)

4. Financial and operational risk management (continued)

December 2020 € '000	Risk Profile	Gross amount	Impairment losses	Net amount
Financial assets at AC:				
Due from customers:				
Retail				
Small Business, Flat Owners Associations				
	Very Low	19 929	(9)	19 920
	Low	27 471	(34)	27 437
	Lower-Intermediate	47 750	(299)	47 451
	Intermediate	124 342	(966)	123 376
	Upper-Intermediate	65 185	(2 019)	63 166
	High	9 025	(1 276)	7 749
	Default	13 620	(9 728)	3 892
Mortgages				
	Very Low	6 960 323	(564)	6 959 759
	Low	303 135	(158)	302 977
	Lower-Intermediate	376 433	(2 354)	374 079
	Intermediate	60 993	(1 555)	59 438
	High	56 810	(3 682)	53 128
	Default	89 647	(33 335)	56 312
Unsecured Retail				
	Very Low	345 776	(399)	345 377
	Low	111 766	(248)	111 518
	Lower-Intermediate	599 235	(3 934)	595 301
	Intermediate	146 351	(4 348)	142 003
	Upper-Intermediate	104 763	(9 324)	95 439
	High	64 455	(14 692)	49 763
	Default	199 373	(124 980)	74 393
		9 726 382	(213 904)	9 512 478
		15 022 447	(298 310)	14 724 137
Financial assets at FVOCI - debt securities				
	Unrated	1 611 015	(306)	1 610 709

(Table continues on the next page)

4. Financial and operational risk management (continued)

December 2020 € '000	Risk Profile	Gross amount	Provisions	Net amount
Financial commitments and contingencies: Due from other banks				
	Very Low	6 073	(1)	6 072
	Lower-Intermediate	46 412	(64)	46 348
		52 485	(65)	52 420
Due from customers: Public administration				
	Very low	26	-	26
	Low	1 134	-	1 134
	Intermediate	4 013	(2)	4 011
	Upper-Intermediate	21 461	(14)	21 447
	High	2 332	(36)	2 296
		28 966	(52)	28 914
Corporate Large, SME, Other Non-banking Financial and Public Corporates and Factoring				
	Very Low	834 827	(88)	834 739
	Low	1 535 063	(683)	1 534 380
	Lower-Intermediate	701 724	(259)	701 465
	Intermediate	382 330	(1 051)	381 279
	Upper-Intermediate	114 153	(863)	113 290
	High	20 005	(480)	19 525
	Default	11 432	(3 150)	8 282
	Unrated	3 240	(52)	3 188
Specialized Lending - SPV, RED				
	Strong	100 517	(542)	99 975
	Good	102 957	(1 100)	101 857
	Satisfactory	56 912	(2 618)	54 294
	Weak	31	-	31
	Default	229	(221)	8
		3 863 420	(11 107)	3 852 313
Retail				
	Very Low	575 519	(102)	575 417
	Low	172 940	(25)	172 915
	Lower-Intermediate	147 979	(355)	147 624
	Intermediate	22 315	(161)	22 154
	Upper-Intermediate	6 903	(227)	6 676
	High	2 893	(461)	2 432
	Default	5 568	(1 349)	4 219
		934 117	(2 680)	931 437
		4 826 503	(13 839)	4 812 664

4. Financial and operational risk management (continued)

For some portfolios, information from external credit reference agencies is also used. The credit quality for financial assets at amortised cost: due from other banks is in the rating scale from Aa1 to Caa1 (31 December 2020: Aa1 to Caa1). The following table sets out the credit quality of FVOCI debt securities. The analysis has been based on Moody's ratings.

June 2021 **€ '000**	**External rating**	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at FVOCI - debt securities				
	Aaa	226 513	(39)	226 474
	Aa1	135 628	(72)	135 556
	A2	362 323	(42)	362 281
	Baa1	169 700	(22)	169 678
	Baa3	440 864	(137)	440 727
		1 335 028	(312)	1 334 716

December 2020 **€ '000**	**External rating**	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at FVOCI - debt securities				
	Aaa	228 624	(48)	228 576
	Aa1	115 411	(79)	115 332
	A2	655 618	(62)	655 556
	Baa1	100 195	(5)	100 190
	Baa3	511 167	(112)	511 055
		1 611 015	(306)	1 610 709

4. Financial and operational risk management (continued)

4.1.12. Credit risk of financial derivatives

Credit exposure (or the replacement cost) of derivative financial instruments represents the Bank's credit exposure from contracts with a positive fair value, that is, it indicates the estimated maximum potential losses in the event that counterparties fail to perform their obligations. It is usually a small proportion of the notional amounts of the contracts. The credit exposure of each contract is indicated by the credit equivalent calculated pursuant to the generally applicable methodology using the current exposure method and involves the market value of the contract (only if positive, otherwise a zero value is taken into account) and a portion of the nominal value, which indicates the potential change in market value over the term of the contract. The credit equivalent is established depending on the type of contract and its maturity. The Bank assesses the credit risk of all financial instruments on a daily basis.

With regard to IFRS 13 which contains a clarification in reference to non-performance risk in determining the fair value of over-the-counter derivatives, the Bank uses the bilateral Credit Value Adjustment model ('bCVA'). It takes fully into account the effects of changes in counterparty credit ratings as well as the changes in own credit rating. The bCVA has two addends, calculated by considering the possibility that both counterparties go bankrupt, known as the Credit Value Adjustment ('CVA') and Debit Value Adjustment ('DVA'):

- The CVA (negative) takes into account scenarios whereby the counterparty fails before the Bank that has a positive exposure to the counterparty. In these scenarios the Bank suffers a loss equal to the cost of replacing/closing the derivative constract,
- The DVA (positive) takes into account scenarios whereby the Bank fails before the counterparty and has a negative exposure to the counterparty. In these scenarios the Bank achieves a gain equal to the cost of replacing/closing the derivative contract.

The bCVA depends on the exposure, probability of default and the loss given default of the counterparties. The Bank is selective in its choice of counterparties and sets limits for transactions with customers. The Bank takes its own and its counterparties' credit risk into consideration to the extent it believes the market participants would do so.

The table below shows the maximum amount of credit risk of derivative financial instruments. To express the maximum amount of credit risk, the fair value of derivative financial assets is increased by the value of the potential credit exposure ('add on') calculated as the nominal value of the derivative financial instrument multiplied by the respective coefficient depending on the type of the instrument. The credit risk of the remaining financial assets not reported in the table below approximates their carrying amounts.

€ '000	**June 2021**	**December 2020**
Financial assets		
Financial assets at fair value through profit or loss:		
Financial assets held for trading:		
Derivative financial instruments	122 040	109 307
Derivatives – Hedge accounting	103 832	127 863
	225 872	237 170

4. Financial and operational risk management (continued)

4.1.13. The impact of the COVID-19 pandemic

On 4 April 2020, Act no. 67/2020 Coll. on certain emergency financial measures in relation to the spread of dangerous contagious human disease COVID-19 entered into force (amended several times), which includes, inter alia, financial market measures that directly affect the Bank's activities, such as measures in the field of financial assistance, financial market supervision, measures to defer loan repayments and measures in the field of contactless payments. The Bank complies with valid legislation and applies the prudential framework published by the European Banking Authority in relation to default, forbearance and IFRS 9 in relation to measures related to the COVID-19 pandemic.

During the pandemic period, the borrower may request the Bank to defer payments for a period not exceeding nine months. The Bank is obliged to allow deferral of installments if the legal requirements are met. By allowing deferred payments, the effects of the debtor's delay do not occur to the extent of deferred fulfillment. Deferral of repayments does not affect the flag of default and does not worsen the credit quality of the borrower. The debtor does not lose the obligation to pay interest for the period of deferred payments and interest is accrued even during the duration of deferred payments.

As at 12 December 2020 EBA amended Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis (EBA/GL/2020/02), which contains rules for the assessment of clients who requested deferral of payments during a pandemic and extended its valid until 31 March 2021. Under the specified conditions, the bank will not worsen the creditworthiness of the client in deferred loan repayments approved until 31 March 2021.

Till 31 March 2021 the Bank received 26 253 requests for deferral of repayments of corporate and retail loans, of which 24 013 was granted in the total gross amount of € 1 187 149 thousand. Out of these, expired € 1 128 075 thousand.

June 2021 € '000		**Performing**			**Non-performing**	
	Gross amount	**Impairment losses**	**Net amount**	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at AC:						
Corporate	10 936	(1 412)	9 524	-	-	-
Retail	47 971	(1 389)	46 582	167	(82)	85
	58 907	(2 801)	56 106	167	(82)	85

4. Financial and operational risk management (continued)

The Bank has joined the SIH Anti-Corona Guarantee 1 and SIH Anti-Corona Guarantee 2 programs, under which it, in cooperation with Slovak Investment Holding ('SIH'), provided assistance to companies to bridge income shortfalls during crisis measures against the spread of coronavirus. SIH assistance consisted of a portfolio guarantee for a loan provided by the Bank and, under the SIH anti-corona guarantee 1 under the conditions of maintaining employment in small and medium-sized enterprises, as well as an interest subsidy of up to 4%. Loans were provided for a maximum of four years up to the amount of € 1 180 thousand with a 12-month deferral of repayment of principal and interest. Under the SIH anti-corona guarantee 2, the SIH guarantee represented 90% of the principal and loans with a maturity of two to six years were provided in a maximum amount of € 2 000 thousand with deferral of principal and interest payments for 12 months with the possibility of waiving the guarantee fee if the conditions are met. Interest rates were limited for micro-enterprises at 3.9% p. a. and for other enterprises 1.9% p. a.

The Bank also participated in the program of financial assistance for Slovak companies to mitigate the effects of the COVID-19 pandemic, launched by EXIMBANKA SR. The aid consisted of a guarantee of 80% of the principal and loans were provided with a maturity of two to six years in the amount of € 2 to 20 million with deferral of principal and interest payments for 12 months with the possibility of waiving the guarantee fee if the conditions are met. The interest rate was limited to 1.9% p. a.

The loans were provided under market conditions and the programs in which the Bank participated are not government grants.

Till 30 June 2021 the Bank provided 1 410 newly originated loans subject to public guarantee schemes in the context of the COVID-19 crisis to enterprises in the total gross amount of € 205 545 thousand.

	Performing			Non-performing		
June 2021 € '000	**Gross amount**	**Impairment losses**	**Net amount**	**Gross amount**	**Impairment losses**	**Net amount**
Financial assets at AC:						
Corporate	158 816	(656)	158 160	1 008	(101)	907
Retail	45 721	(414)	45 307	-	-	-
	204 537	(1 070)	203 467	1 008	(101)	907

4. Financial and operational risk management (continued)

4.2. Market risk

Market risk is the risk that changes in market prices, such as interest rate, equity prices or foreign exchange rate will affect the Bank's income or the value of its holdings of financial instruments. The objective of market risk management is to manage and control market risk exposures within acceptable parameters, while optimizing the return on risk.

4.2.1. Management of market risk

The Bank separates its exposures to market risk between trading ('trading book') and non-trading portfolios ('banking book'). Trading portfolios are held by the Trading sub-department and Sales sub-department include positions arising from market-making and proprietary position taking. All foreign exchange risk within the Bank is transferred each day to the Trading sub-department and forms part of the trading portfolio for risk management purposes. The non-trading portfolios are managed by the sub-department Asset Liability Management ('ALM'), and include all positions which are not intended for trading.

Trading portfolios includes derivative financial instruments used for both trading and hedging and debt securities classified as financial assets held for trading. All other financial instruments are part of the banking book.

Overall authority for market risk is vested in ALCO. The Enterprise Risk Management Department is responsible for the development of detailed risk management policies (subject to review and approval by ALCO) and for their implementation and day-to-day market risk monitoring and reporting.

In the normal course of business, the Bank enters into derivative financial instrument transactions to hedge its liquidity, foreign exchange and interest rate risks. The Bank also enters into proprietary derivative financial transactions for the purpose of generating profits from short-term fluctuations in market prices. The Bank operates a system of market risk and counterparty limits, which are designed to restrict exposure to movements in market prices and counterparty concentrations. The Bank also monitors adherence to these limits on a daily basis.

4.2.2. Exposure to market risk – trading portfolios

The principal tool used to measure and control market risk exposures within the Bank's trading portfolio is Value at Risk ('VaR'). A derivation of VaR is the stress VaR ('sVaR'), which represents maximal VaR of a selected one year period generating the highest value of VaR during a period of at least the last ten years. The VaR of a trading portfolio is the estimated loss that will arise on the portfolio over a specified period of time (holding period) from an adverse market movement with a specified probability (confidence level). The VaR model used by the Bank is based upon a 99% confidence level and assumes a one-day holding period.

The VaR and sVaR models used are based on historical simulations. Taking into account market data from the previous year and in case of sVaR a one year scenario from at least the last ten years of history and observed relationships between different markets and prices, the models generate a wide range of plausible future scenarios for market price movements evaluated in the model. The VaR model was approved by the NBS as a basis for the calculation of the capital charge for market risk of the trading book.

The Bank uses VaR limits for total market risk in the trading book, foreign exchange risk and interest rate risk. The overall structure of VaR and sVaR limits is subject to review and approval by ALCO and Intesa Sanpaolo. VaR is measured on a daily basis. Daily reports of utilisation of VaR and sVaR limits are submitted to the trading unit, the head of the Division Risk Management and the head of the Department Treasury and ALM. Regular summaries are submitted to Intesa Sanpaolo and ALCO.

A summary of the VaR and sVaR position of the Bank's trading portfolios:

	June 2021				December 2020			
€ '000	**Balance**	**Avg**	**Max**	**Min**	**Balance**	**Avg**	**Max**	**Min**
Foreign currency risk	29	40	11	12	88	76	277	3
Interest rate risk	96	93	251	4	162	218	489	22
Total VaR	92	106	28	39	164	261	633	30
Total sVaR	609	443	1 466	195	178	503	1 265	135

4. Financial and operational risk management (continued)

Although VaR is a popular and widely used risk management tool, there are known limitations, among which the following are the most important ones:

- VaR does not measure the worst case loss, since a 99% confidence interval means that in 1% of cases the loss is expected to be greater than the VaR amount;
- VaR calculated using a one day holding period assumes hedge or disposal of a position within one day, which might not be realistic in the case of a longer illiquid situation on the market;

These limitations are recognized, by supplementing VaR limits with other structure position limits. In addition, the Bank uses a wide range of stress tests, to model the financial impact of a variety of exceptional market scenarios on the Bank's position. Furthermore, integrating the sVaR measure into the VaR concept adds to mitigation of the limitation of using historical series and possibly omitting scenarios of an extraordinary nature.

4.2.3. Exposure to interest rate risk

Interest rate risk comprises of the risk that the value of a financial instrument will fluctuate due to changes in market interest rates and of the risk that the maturities of interest earning assets differ from the maturities of the interest bearing liabilities used to fund those assets. The length of time for which the interest rate is fixed on a financial instrument therefore indicates the extent to which it is exposed to interest rate risk.

All the assumptions, methodologies and responsibilities are described in internal documents 'Guidelines on the Governance of Interest Rate Risk in the Banking Book' ('IRRBB') and 'Rules on the Measurement and Control of IRRBB in VÚB Group' which are approved by the Management Board and are consistent with ISP Group IRRBB Guidelines and Rules.

The main risk to which non-trading portfolios are exposed is the risk of loss from fluctuations in the future cash flows or fair values of financial instruments due to a change in market interest rates. Interest rate risk is managed mainly through the monitoring of interest rate gaps. Financial instruments are mapped to repricing time buckets either by maturity for fixed rate instruments, or by next re-pricing date for floating rate instruments. Assets and liabilities that do not have a contractual maturity date are mapped according to internal models based on behavioural assumptions.

The Risk Management division is responsible for monitoring and reporting of interest rate gaps at least on a monthly basis. The management of interest rate risk is measured by shift sensitivity of fair value analysis (change in present value). In line with the ISP Group methodology, the shift sensitivity analysis is done through baseline, internal stress and regulatory scenarios. Baseline scenarios are defined as a parallel and instantaneous shift of +/- 100 basis points of the yield curve. Internal stress scenarios have been introduced in 2017, measuring the shift sensitivity through parallel and instantaneous shift of +/-200 basis points, and non-parallel steepening and flattening scenarios as well as short rates up and down scenarios. Six regulatory scenarios, according to the Interest Rate Risk in the Banking Book Guidelines published by Basel Committee on Banking Supervision, have been introduced in 2017. All scenarios are applied on monthly basis as from September 2019.

The sensitivity of the interest margin is also measured with a set of scenarios similar to shift sensitivity analysis – baseline, internal stress and regulatory scenarios. The baseline scenario is represented by parallel and instantaneous +/-50 bps shocks in the yield curve, in a period of the following 12 months. Furthermore, additional internal stress and regulatory scenarios are applied: +/-100, +/-200 and six stress scenarios according to the Interest Rate Risk in the Banking Book Guidelines published by the Basel Committee on Banking Supervision.

Overall banking book interest rate risk positions are managed by the Treasury and ALM Department, which uses different on balance and off balance sheet instruments to manage the overall positions arising from the banking book activities.

4. Financial and operational risk management (continued)

Models applied for the interest rate risk ('IRR') calculation

Each financial and non-financial instrument is allocated to the time bucket based on its contractual or behavioural repricing date:

Contractual category

This category includes instruments where the Bank knows exactly when the maturity or next re-pricing takes place. This treatment is applied mainly to: bought and issued securities, received loans and term deposits.

Behavioural category

These are items for which it is not exactly known when the maturity or next re-pricing will take place (e.g. current accounts). There are also some items where the maturity or re-pricing period is known but it can be assumed that they will behave differently (e.g. prepayments can occur for mortgages and consumer loans). In this case, it is necessary to make certain assumptions to reflect the behaviour characteristics of these items. The assumptions are based on the detailed analysis of the Bank's historical time series data and statistical models.

As at 31 June 2021, the sensitivity of the FVOCI reserve in equity related to the non-hedged part of the portfolio to 100 basis points rise in interest rates was € (1 130) thousand (31 December 2020: € (2 523) thousand).

The average interest rates for financial assets and financial liabilities were as follows:

	June 2021	December 2020
Financial assets		
Cash and cash equivalents	0.06%	0.06%
Financial assets at FVTPL	0.07%	0.17%
Financial assets at FVOCI	(0.29)%	(0.07)%
Financial assets at AC:		
Due from other banks	1.16%	1.68%
Due from customers	1.95%	2.13%
Financial liabilities		
Financial liabilities at AC:		
Due to banks	1.21%	0.38%
Due to customers	0.09%	0.14%
Debt securities in issue	0.39%	0.55%

4. Financial and operational risk management (continued)

4.2.4. Currency denominations of assets and liabilities

Foreign exchange rate risk comprises the risk that the value of financial assets and financial liabilities will fluctuate due to changes in foreign exchange rates. It is the policy of the Bank to manage its exposure to fluctuations in exchange rates through regular monitoring and reporting of open foreign exchange positions and the application of a matrix of position exposure in single currencies and overall position limit.

4.2.5. Interest rate benchmark reform

The Interbank offered rate ('IBOR') replacement represents one of the major undertakings for the financial services industry. For the Bank the impact is not expected to be material and can be split into three main categories:

- Replacement of Euro OverNight Index Average ('EONIA');
- Change of Euro Interbank Offered Rate ('EURIBOR') calculation;
- Replacement of London Interbank Offered Rate ('LIBOR').

Replacement of EONIA

Replacement of EONIA has only limited impact on the Bank as this change affects only a few number of customer (up to fifteen) and the contracts are in the process of amendment to replace EONIA with the new Euro Short-Term Rate ('€STR').

VUB has few interbank derivatives which are linked to EONIA. Majority will mature before end of 2021. For the remaining swaps the Bank acts in accordance with other market participants.

No impact on hedge accounting is expected.

Change of EURIBOR calculation

Change of the calculation of EURIBOR by the panel banks has already happened and does not represent any issue for the Bank.

Replacement of LIBOR

The Bank has only few loans which are linked to Libor, since most of the Bank's loans are in EUR and thus if floaters then they are linked to Euribor. For loans in USD or GBP, the Bank will wait till a new tenor benchmark in these currencies is created and then the existing contracts with the customers will be amended.

Similar to the loans also in the area of derivatives there are only few interbank hedging derivatives linked to Libor.

Also here we will wait for the definitive approach of the market participants and based on this the contracts will be amended.

4. Financial and operational risk management (continued)

4.3. Liquidity risk

Liquidity risk is defined as the risk that the Bank is not able to meet its payment obligations when they fall due (funding liquidity risk). Normally, the Bank is able to cover cash outflows with cash inflows, highly liquid assets and its ability to obtain credit.

The Guidelines for Liquidity Risk Management adopted by the Bank outline the set of principles, methods, regulations and control processes required to prevent the occurrence of a liquidity crisis and call for the Bank to develop prudent approaches to liquidity management, making it possible to maintain the overall risk profile at low levels.

The basic principles underpinning the Liquidity Policy of the Bank are:

- The existence of an operating structure that works within set of limits and of a control structure that is independent from the operating structure;
- A prudential approach to the estimate of the cash inflow and outflow projections for all the balance sheet and off-balance sheet items, especially those without a contractual maturity;
- An assessment of the impact of various scenarios, including stress testing scenarios, on the cash inflows and outflows over time;
- The maintenance of an adequate level of unencumbered highly liquid assets, capable of enabling ordinary operations, also on an intraday basis, and overcoming the initial stages of a shock involving the Bank's liquidity or system liquidity.

The Bank is regularly stress testing its liquidity position in order to simulate potential stress scenarios. The level of unencumbered highly liquid assets are kept at levels that, should support the bank also in case of these extraordinary events. The bank is also able to seek short term funding from the parent company or interbank market in order to support its liquidity position. There are no specific lines of credit for liquidity stress situations.

The departments of the Bank responsible for ensuring the correct application of the Guidelines are the Treasury and ALM Department. These Guidelines are broken down into three macro areas: 'Short term Liquidity Policy', 'Structural Liquidity Policy' and 'Contingency Liquidity Plan', and constitute an integral part of the Internal Liquidity Adequacy Assessment Process. ALM Department is responsible for liquidity management and the Enterprise Risk Management Department responsible for monitoring indicators and verifying the observation of limits.

The Short term Liquidity Policy includes a set of parameters, limits and observation thresholds that enable the measurement, both under normal market conditions and under conditions of stress, of liquidity risk exposure over the short term, setting the maximum amount of risk to be assumed and ensuring the utmost prudence in its management. The main regulatory indicator used for monitoring and managing short term liquidity is the Liquidity coverage ratio. It is required by the CRR Regulation, more precisely defined in Delegated Regulation (EU) 2015/61. Main content of the Liquidity coverage ratio: Institutions shall hold liquid assets, the sum of the values of which covers the liquidity outflows less the liquidity inflows under stressed conditions so as to ensure that institutions maintain levels of liquidity buffers which are adequate to face any possible imbalance between liquidity inflows and outflows under gravely stressed conditions over a period of thirty days. During times of stress, institutions may use their liquid assets to cover their net liquidity outflows.

The Structural Liquidity Policy of the Bank incorporates a set of measures and limits designed to control and manage the risks deriving from the mismatch of the medium to long-term maturities of the assets and liabilities, essential for the strategic planning of liquidity management. This involves the adoption of internal limits for the transformation of maturity dates aimed at preventing the medium to long-term operations from giving rise to excessive imbalances to be financed in the short term.

Together with the Short term and Structural Liquidity Policy, the Guidelines provide for the management methods of a potential liquidity crisis, defined as a situation of difficulty or inability of the Bank to meet its cash commitments falling due, without implementing procedures and/or employing instruments that, due to their intensity or manner of use, do not qualify as ordinary administration.

The Contingency Liquidity Plan sets the objectives of safeguarding the Bank's capital and, at the same time, guarantees the continuity of operations under conditions of extreme liquidity emergency. It also ensures the identification of the pre-warning signals and their ongoing monitoring, the definition of procedures to be implemented in situations of liquidity stress, the immediate lines of action, and intervention measures for the resolution of emergencies. The pre-warning indices, aimed at identifying signs of a potential liquidity strain, both systemic and specific, are continuously recorded and reported to the departments responsible for the management and monitoring of liquidity.

4. Financial and operational risk management (continued)

The liquidity position of the Bank is regularly presented by Enterprise Risk Management Department and discussed during the ALCO meetings.

The table below shows an analysis of assets and liabilities (discounted cash flow basis) according to when they are expected to be recovered or settled:

June 2021 **€ '000**	**Less than 12 months**	**Over 12 months**	**Total**
Assets			
Cash and cash equivalents	2 434 409	-	2 434 409
Financial assets at FVTPL	11 648	191 933	203 581
Derivatives – Hedge accounting	102	55 788	55 890
Financial assets at FVOCI	444 255	898 263	1 342 518
Financial assets at AC:			
Due from other banks	75 252	122 383	197 635
Due from customers	2 782 818	12 594 446	15 377 264
Fair value changes of the hedged items in portfolio hedge of IRR	-	12 135	12 135
Investments in subsidiaries, joint ventures and associates	-	69 629	69 629
Property and equipment	-	109 927	109 927
Intangible assets	-	126 909	126 909
Goodwill	-	18 871	18 871
Current income tax assets	14 222	-	14 222
Deferred income tax assets	-	45 621	45 621
Other assets	14 881	-	14 881
Non-current assets and disposal groups classified as held for sale	154	-	154
	5 777 741	14 245 905	20 023 646
Liabilities			
Financial liabilities at FVTPL	(14 653)	(66 429)	(81 082)
Derivatives – Hedge accounting	(7 379)	(27 718)	(35 097)
Financial liabilities measured at AC:			
Due to banks	(131 020)	(1 096 792)	(1 227 812)
Due to customers	(1 642 920)	(11 117 387)	(12 760 307)
Lease liabilities	(6 501)	(15 758)	(22 259)
Subordinated debt	(134)	(200 000)	(200 134)
Debt securities in issue	(53 085)	(3 797 535)	(3 850 620)
Fair value changes of the hedged items in portfolio hedge of IRR	-	(5 129)	(5 129)
Current income tax liabilities	(328)	-	(328)
Provisions	-	(15 749)	(15 749)
Other liabilities	(73 448)	(5 407)	(78 855)
	(1 929 468)	(16 347 904)	(18 277 372)
Net position	3 848 273	(2 101 999)	1 746 274

4. Financial and operational risk management (continued)

December 2020 **€ '000**	**Less than 12 months**	**Over 12 months**	**Total**
Assets			
Cash and cash equivalents	1 571 629	-	1 571 629
Financial assets at FVTPL	5 791	80 343	86 134
Derivatives – Hedge accounting	100	85 092	85 192
Financial assets at FVOCI	743 755	874 312	1 618 067
Financial assets at AC:			
Due from other banks	77 261	128 159	205 420
Due from customers	2 632 937	12 091 200	14 724 137
Fair value changes of the hedged items in portfolio hedge of IRR	-	20 016	20 016
Investments in subsidiaries, joint ventures and associates	-	69 629	69 629
Property and equipment	-	113 163	113 163
Intangible assets	-	128 896	128 896
Goodwill	-	18 871	18 871
Current income tax assets	26 518	-	26 518
Deferred income tax assets	-	51 056	51 056
Other assets	22 685	-	22 685
Non-current assets and disposal groups classified as held for sale	1	-	1
	5 080 677	13 660 737	18 741 414
Liabilities			
Financial liabilities at FVTPL	(12 068)	(75 309)	(87 377)
Derivatives – Hedge accounting	(7 607)	(57 800)	(65 407)
Financial liabilities measured at AC:			
Due to banks	(67 225)	(103 446)	(170 671)
Due to customers	(1 587 769)	(11 390 191)	(12 977 960)
Lease liabilities	(6 734)	(16 124)	(22 858)
Subordinated debt	(151)	(200 000)	(200 151)
Debt securities in issue	(108 020)	(3 314 709)	(3 422 729)
Fair value changes of the hedged items in portfolio hedge of IRR	-	(6 990)	(6 990)
Current income tax liabilities	(635)	-	(635)
Provisions	-	(14 895)	(14 895)
Other liabilities	(73 088)	(5 407)	(78 495)
	(1 863 297)	(15 184 871)	(17 048 168)
Net position	3 217 380	(1 524 134)	1 693 246

4. Financial and operational risk management (continued)

4.4. Operational risk

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. Operational risk includes legal risk and compliance risk, model risk, information and communication technology risk and financial reporting risk; strategic and reputational risk are not included. Operational risk can arise from legal and regulatory requirements, non-compliance with generally accepted standards of corporate behaviour and from all of the Bank's operations.

4.4.1. Operational risk management strategies and processes

The Bank, in coordination with Intesa Sanpaolo, has defined the overall operational risk management framework by setting up a VUB Group policy and organisational process for measuring, managing and controlling operational risk.

The control of operational risk was attributed to the Operational Risk Committee, which identifies risk management policies. The Supervisory and Management Boards of the Bank ensures the functionality, efficiency and effectiveness of the risk management and controls system.

The Operational Risk Committee (composed of the heads of the areas of the governance centre (Chief Executive Officer, Deputy Chief Executive Officer) and of the business areas more involved in operational risk management (voting members: Head of Risk Management Division, Chief Financial Officer, Chief Operating Officer, Head of Compliance Department, Head of Anti-Money Laundering Department; permanent invitees without voting rights**:** Head of Corporate & SME Division, Head of Retail Division, Head of Enterprise Risk Management Department, Head of Legal Department, Head of Human Resources & Organization Department, Head of Information Security sub-department), has the task of periodically reviewing the VUB Group's overall operational risk profile, authorising any corrective actions, coordinating and monitoring the effectiveness of the main mitigation activities and approving the operational risk transfer strategies.

4.4.2. Organisational structure of the associated risk management function

For some time, the Bank has had a centralised function within the Risk Management Division for the management of the Bank's operational risks. This function is responsible, in coordination with the Parent Company, for the definition, implementation and monitoring of the methodological and organisational framework, as well as for the measurement of the risk profile, the verification of mitigation effectiveness and reporting to senior Management. In compliance with current requirements, the individual organisational units participate in the process and each of them is responsible for the identification, assessment, management and mitigation of its operational risks. Specific offices and departments have been identified within these organisational units to be responsible for Operational Risk Management. These functions are responsible for the collection and structured census of information relating to operational events, scenario analyses and evaluation of the level of risk associated with the business environment, including information and communication technology risk. The Risk Management Division carries out second level monitoring of these activities.

4.4.3. Scope of application and characteristics of the risk measurement and reporting system

In February 2010 upon a VUB Group request, the Bank as part of the VUB Group received, from the relevant Supervisory authorities an approval for usage and thus adopted the Advanced Measurement Approach ('AMA'), for Operational Risk management and measurement. In June 2013, the Bank as part of the VUB Group received an approval for usage and thus adopted the AMA for the subsidiary VUB Leasing, a. s. Part of this decision has been an approval of the insurance effect inclusion, as well as approval of a new allocation mechanism, which led to fulfilment of a regulatory condition for the approval of diversification usage.

For the use of the AMA, the Bank has set up, in addition to the corporate governance mechanisms required by the Supervisory regulations, a system for the management of operational risk certified by the process of annual self-assessment carried out by the Bank and the subsidiary VUB Leasing, a. s. that fall within the scope of AMA. This process is verified by the Internal Audit Department and submitted to the relevant Bank's Committee for the annual certification of compliance with the requirements established by the regulation.

Under the AMA approach, the capital requirement is calculated by an internal model, which combines all elements stipulated in Supervisory regulation, allowing to measure the exposure in a more risk-sensitive way. Monitoring of operational risks is performed by an integrated reporting system, which provides management with the information necessary for the management and/or mitigation of the operational risk.

4.4.4. Policies for hedging and mitigating risk

The Bank, in coordination with its Parent Company, has set up a traditional operational risk transfer policy (insurance) aimed at mitigating the impact of any unexpected losses. The AMA calculation does include the benefit from this transfer of operational risk through insurance policies, which contributes to reducing the risk capital calculated through the internal models.

5. Estimated fair value of financial assets and financial liabilities

See accounting policy in note 3.4.7.

The Bank uses the following fair value hierarchy that categorises into three levels the inputs to valuation techniques used to measure fair value:

- Level 1: inputs represented by quoted prices (unadjusted) in active markets for identical assets or liabilities accessible by the Bank as at the measurement date;
- Level 2: inputs other than quoted prices included in Level 1 that are directly or indirectly observable for the assets or liabilities to be measured; and
- Level 3: inputs unobservable for the asset or liability.

The highest priority is attributed to effective market quotes (level 1) for the valuation of assets and liabilities or for similar assets and liabilities measured using valuation techniques based on market-observable parameters other than financial instruments quotes (level 2) and the lowest priority to unobservable inputs (level 3). Following this hierarchy, where available, fair value estimates made by the Bank are based on quoted market prices. However, no readily available market prices exist for a significant portion of the Bank's financial instruments. In circumstances where the quoted market prices are not readily available, fair value is estimated using discounted cash flow models or other pricing models as appropriate.

Under level 2, the principal valuation technique used by the Bank for debt instruments involves the method of discounting future cash flows. The calculation takes into account the time value of money (risk-free rate of interest) and the credit risk expressed in the form of credit spreads applied to the bonds' yield and representing the risk premium the investor claims against a risk free investment. In the case of derivative financial instruments the Bank uses standard fair value calculation models based on the principal net present value using the yield curve to discount all future cash flows from derivatives for all relevant currencies. The principal input parameters used by the models comprise interest rate curves, volatility curves, spot and forward prices and the correlation between underlying assets. Changes in underlying assumptions, including discount rates and estimated future cash flows, significantly affect the estimates. The Bank also considers its own and counterparty's credit risk.

The valuation technique defined for a financial instrument is adopted over time and is modified only following significant changes in market conditions or the subjective conditions related to the issuer of the financial instrument. The Bank monitors the occurrence of these changes and accordingly reassesses the classification into the fair value hierarchy. For determining the timing of the transfers between the levels, the Bank uses the end of the reporting period as the day when the transfer is deemed to have occurred.

In estimating the fair value of the Bank's financial instruments, the following methods and assumptions were used:

(a) Cash and cash equivalents

The carrying values of cash and cash equivalents are deemed to approximate their fair value.

(b) Due from other banks

The fair value of due from other banks balances with maturities more than one year is estimated using discounted cash flow analyses, based upon the risk free interest rate curve. For maturities up to one year and not significant balances, the carrying amounts of amounts due from other banks approximates their fair value. Impairment losses are taken into consideration when calculating fair values.

5. Estimated fair value of financial assets and financial liabilities (continued)

(c) Due from customers

The fair value of loans and advances to customers is estimated using discounted cash flow analyses, based upon the risk free interest rate curve and risk reflecting credit-worthiness of the counterparty. Impairment losses are taken into consideration when calculating fair values.

(d) Due to banks and Due to customers

The carrying amounts of due to banks approximates their fair value. The fair value of due to customers is estimated by discounting their future expected cash flows using the risk free interest rate curve.

(e) Subordinated debt

The fair value of subordinated debt is discounted using the risk free interest rate curve and own credit risk.

(f) Debt securities in issue

The fair value of debt securities issued by the Bank is based on quoted market prices. Where no market prices are available, the fair value was calculated by discounting future cash flows using the risk free interest rate curve adjusted by credit spreads reflecting the credit quality of VUB as the issuer.

5. Estimated fair value of financial assets and financial liabilities (continued)

June 2021 € '000	Note	Carrying amount At amortised cost	At fair value	Total carrying amount	Fair value Level 1	Level 2	Level 3	Total fair value
Financial assets								
Cash and cash equivalents	7	2 434 409	-	2 434 409	-	2 434 410	-	2 434 410
Financial assets at FVTPL	8	-	203 581	203 581	104 344	99 236	-	203 580
Derivatives – Hedge accounting	9	-	55 890	55 890	-	55 890	-	55 890
Financial assets at FVOCI	10	-	1 342 518	1 342 518	1 015 443	327 074	-	1 342 517
Financial assets at AC:	11							
Due from other banks		197 635	-	197 635	-	197 634	-	197 634
Due from customers		15 377 264	-	15 377 264	-	49 780	17 236 617	17 286 397
		18 009 308	1 601 989	19 611 297	1 119 787	3 164 024	17 236 617	21 520 428
Financial liabilities								
Financial liabilities at FVTPL	8	-	81 082	81 082	-	81 082	-	81 082
Derivatives – Hedge accounting	9	-	35 097	35 097	-	35 097	-	35 097
Financial liabilities at AC:	11							
Due to banks		1 227 812	-	1 227 812	-	1 227 812	-	1 227 812
Due to customers		12 760 307	-	12 760 307	-	12 762 433	-	12 762 433
Lease liabilities		22 259	-	22 259	-	22 259	-	22 259
Subordinated debt		200 134	-	200 134	-	231 396	-	231 396
Debt securities in issue		3 850 620	-	3 850 620	-	3 891 994	-	3 891 994
		18 061 132	116 179	18 177 311	-	18 252 073	-	18 252 073

5. Estimated fair value of financial assets and liabilities (continued)

December 2020 € '000	Note	Carrying amount At amortised cost	At fair value	Total carrying amount	Fair value Level 1	Level 2	Level 3	Total fair value
Financial assets								
Cash and cash equivalents	7	1 571 629	-	1 571 629	-	1 571 629	-	1 571 629
Financial assets at FVTPL	8	-	86 134	86 134	711	85 423	-	86 134
Derivatives – Hedge accounting	9	-	85 192	85 192	-	85 192	-	85 192
Financial assets at FVOCI	10	-	1 618 067	1 618 067	896 128	721 938	-	1 618 066
Financial assets at AC:	11							
Due from other banks		205 420	-	205 420	-	205 420	-	205 420
Due from customers		14 724 137	-	14 724 137	-	96 415	16 699 116	16 795 531
		16 501 186	1 789 393	18 290 579	896 839	2 766 017	16 699 116	20 361 972
Financial liabilities								
Financial liabilities at FVTPL	8	-	87 377	87 377	-	87 377	-	87 377
Derivatives – Hedge accounting	9	-	65 407	65 407	-	65 407	-	65 407
Financial liabilities at AC:	11							
Due to banks		170 671	-	170 671	-	170 671	-	170 671
Due to customers		12 977 960	-	12 977 960	-	12 981 028	-	12 981 028
Lease liabilities		22 858	-	22 858	-	22 858	-	22 858
Subordinated debt		200 151	-	200 151	-	233 805	-	233 805
Debt securities in issue		3 422 729	-	3 422 729	-	3 488 512	-	3 488 512
		16 794 369	152 784	16 947 153	-	17 049 658	-	17 049 658

There were no other transfers of financial instruments among the levels during 2021 and 2020.

6. Segment reporting

The Bank reports financial and descriptive information about its operating segments in the financial statements. An operating segment is a component of the Bank that engages in business activities from which it may earn revenues and incur expenses (including revenues and expenses relating to transactions with other components of the Bank), whose operating results are regularly reviewed by the Bank's management to make decisions about resources to be allocated to the segment and to assess its performance, and for which separate financial information is available.

The Bank operates in three operating segments – Retail Banking, Corporate Banking and Central Treasury. Each segment is exposed to different risks and differs in the nature of its services, business processes and types of customers for its products and services.

For all segments the Bank reports a measure of segment assets and liabilities and income and expense items, a reconciliation of total reportable segment revenues, total profit or loss, total assets, liabilities and other amounts disclosed for reportable segments to corresponding amounts in the financial statements.

Most of the transactions of the Bank are related to the Slovak market. Due to the market size, the Bank operates as a single geographical segment unit.

Operating segments pay and receive interest to and from the Central Treasury on an arm's length basis in order to reflect the costs of funding.

Retail Banking includes loans, deposits and other transactions and balances with households, sole traders and small business segment.

Corporate Banking comprises SME, the Corporate Customer Desk ('CCD'), Municipalities and Public Sector Entities. SME includes complex loan structures, deposits and other transactions and balances with SME (company revenue up to € 50 million; if revenue information is not available, bank account turnover is used). The CCD includes complex loan structures, deposits and other transactions and balances with large corporate customers (company revenue over € 50 million).

Central Treasury undertakes the Bank's funding, issues of debt securities as well as trading book.

The Bank reported within Other a Central Governance Centre that manages the Bank's premises, equity investments and own equity funds as well as Risk Management that operates the workout loan portfolio. Unclassified items are also reported within this column.

6. Segment reporting (continued)

June 2021 **€ '000**	**Retail Banking**	**Corporate Banking**	**Central Treasury**	**Total reportable segments**	**Other**	**Total**
External revenue:						
Interest and similar income	101 927	49 883	(8 318)	143 492	2 832	146 324
Interest and similar expense	(3 145)	(925)	(7 533)	(11 603)	(3 111)	(14 714)
Inter-segment revenue	(3 043)	(4 728)	8 306	535	(535)	-
Net interest income	95 739	44 230	(7 545)	132 424	(814)	131 610
Net fee and commission income (note 25)	52 598	16 608	1 015	70 221	(1 730)	68 491
Dividend income	-	-	-	-	3 002	3 002
Net trading result	1 306	1 899	9 831	13 036	36	13 072
Other operating income	(968)	3	-	(965)	1 968	1 003
Other operating expense	(14 422)	-	-	(14 422)	(2 416)	(16 838)
Special levy of selected financial institutions*	-	-	-	-	-	-
Salaries and employee benefits	(22 062)	(5 066)	(330)	(27 458)	(31 223)	(58 681)
Other administrative expenses*	-	-	-	-	(34 460)	(34 460)
Amortisation	(3 190)	(141)	-	(3 331)	(4 671)	(8 002)
Depreciation	(1 379)	(32)	(2)	(1 413)	(5 317)	(6 730)
Profit before provisions, impairment and tax	107 622	57 501	2 969	168 092	(75 625)	92 467
Net modification gains or losses*	-	-	-	-	(46)	(46)
Provisions*	-	-	-	-	(9)	(9)
Impairment losses	1 263	(18 744)	248	(17 233)	985	(16 248)
Net (loss)/gain arising from the derecognition of financial assets at amortised cost	(2 282)	739	-	(1 543)	(8)	(1 551)
Profit before tax	106 603	39 496	3 217	149 316	(74 703)	74 613
Segment assets	10 025 477	5 507 878	3 874 863	19 408 218	615 428	20 023 646
				-		
Segment liabilities	8 834 267	4 527 175	4 510 720	17 872 162	405 210	18 277 372

* The Bank does not allocate these items to the individual segments.

6. Segment reporting (continued)

June 2020 **€ '000**	**Retail Banking**	**Corporate Banking**	**Central Treasury**	**Total reportable segments**	**Other**	**Total**
External revenue:						
Interest and similar income	56 288	26 304	(3 126)	79 466	1 976	81 442
Interest and similar expense	(2 996)	(1 695)	(4 127)	(8 818)	(2 074)	(10 892)
Inter-segment revenue	(5 041)	(6 488)	11 570	41	(41)	-
Net interest income	48 251	18 121	4 317	70 689	(139)	70 550
Net fee and commission income (note 25)	24 954	6 647	272	31 873	(520)	31 353
Dividend income	-	-	-	-	4 001	4 001
Net trading result	1 050	1 280	(918)	1 412	(54)	1 358
Other operating income	-	23	-	23	973	996
Other operating expense	(7 692)	-	-	(7 682)	(738)	(8 430)
Special levy of selected financial institutions*	-	-	-	-	(15 499)	(15 499)
Salaries and employee benefits	(9 931)	(2 069)	(162)	(12 162)	(17 677)	(29 839)
Other administrative expenses*	-	-	-	-	(18 041)	(18 041)
Amortisation	(1 443)	(61)	-	(1 504)	(1 858)	(3 362)
Depreciation	(660)	(12)	(1)	(673)	(2 575)	(3 248)
Profit before provisions, impairment and tax	54 529	23 929	3 508	81 966	(52 127)	29 839
Provisions*	-	-	-	-	(4)	(4)
Impairment losses	(7 758)	(2 362)	475	(9 645)	6	(9 639)
Net (loss)/gain arising from the derecognition of financial assets at amortised cost	(1 758)	(297)	-	(2 055)	-	(2 055)
Profit before tax	45 013	21 270	3 983	70 266	(52 125)	18 141

December 2020 **€ '000**						
Segment assets	9 450 893	5 368 578	3 358 182	18 177 653	563 761	18 741 414
Segment liabilities	8 060 841	4 942 827	3 735 077	16 738 745	309 423	17 048 168

* The Bank does not allocate these items to the individual segments.

7. Cash and cash equivalents

'Cash and cash equivalents' comprise the following balances:

€ '000	June 2021	December 2020
Cash in hand	181 127	161 155
Balances at central banks:		
Compulsory minimum reserves	2 092 216	777 270
Current accounts	2	38
Term deposits	47 087	7 621
Loans and advances	86 332	604 335
	2 225 637	1 389 264
Due from other banks:		
Current accounts	27 645	21 210
	2 434 409	1 571 629

The compulsory minimum reserve is maintained as an interest bearing deposit under the regulations of the NBS and Česká národní banka ('ČNB'). The amount of the compulsory minimum reserve depends on the level of customer deposits accepted by the Bank and the amount of issued bonds, both with a maturity of up to two years. The rate for the calculation of the compulsory minimum reserve is 1% for the reserves held at the NBS and 2% for the reserves held at ČNB. The required balance is calculated as the total of individual items multiplied by the valid rate.

The daily balance of the compulsory minimum reserve can vary significantly based on the amount of incoming and outgoing payments. The Bank's ability to withdraw the compulsory minimum reserve is restricted by local legislation. The compliance with the compulsory minimum reserve requirement is determined on the basis of the institutions' average daily reserve holdings over the maintenance period.

8. Financial assets and financial liabilities at fair value through profit or loss

€ '000	June 2021	December 2020
Financial assets held for trading:		
Trading derivatives	77 555	79 260
Equity instruments	-	6 163
Government debt securities of European Union countries	118 285	-
	195 840	85 423
Non-trading financial assets at fair value through profit or loss:		
Equity instruments	7 741	711
Financial liabilities held for trading:		
Trading derivatives	81 082	87 377

Equities in 'Non-trading financial assets at fair value through profit or loss' are represented by shares of Intesa Sanpaolo S. p. A. and Visa Inc. Series C Preferred Stock. The ISP shares form the part of the incentive plan introduced by the Parent Company in line with the Capital Directive 'CRD III' (i.e. Directive 2010/76/EU amending the Capital Requirements Directives). As at 1 January 2021, Visa Inc. Series C Preferred Stock were reclassified from 'Financial assets held for trading' to 'Non-trading financial assets at fair value through profit or loss'. The Bank did not elect at initial recognition the option to present these shares at FVOCI.

8. Financial assets and financial liabilities at fair value through profit or loss (continued)

€ '000	June 2021 Assets	December 2020 Assets	June 2021 Liabilities	December 2020 Liabilities
Trading derivatives – Fair values				
Interest rate instruments:				
Forwards and swaps	64 973	71 917	66 625	74 070
Foreign currency instruments:				
Forwards and swaps	4 502	5 616	6 519	11 728
Options	173	194	161	194
	4 675	5 810	6 680	11 922
Equity and commodity instruments:				
Commodity forwards and swaps	7 907	1 533	7 777	1 385
	77 555	79 260	81 082	87 377

€ '000	June 2021 Assets	December 2020 Assets	June 2021 Liabilities	December 2020 Liabilities
Trading derivatives – Notional values				
Interest rate instruments:				
Forwards and swaps	5 001 177	3 834 656	5 001 177	3 834 656
Options	113 039	116 703	113 039	116 703
Futures	10 707	-	10 707	-
	5 124 923	3 951 359	5 124 923	3 951 359
Foreign currency instruments:				
Forwards and swaps	499 952	1 025 828	505 222	1 032 169
Options	18 717	21 859	18 722	21 859
	518 669	1 047 687	523 944	1 054 028
Equity and commodity instruments:				
Commodity forwards and swaps	40 081	37 770	40 081	37 770
	5 683 673	5 036 816	5 688 948	5 043 157

9. Derivatives – Hedge accounting

€ '000	June 2021 Assets	December 2020 Assets	June 2021 Liabilities	December 2020 Liabilities
Fair value hedges of interest rate, foreign currency and inflation risk	55 890	85 192	35 097	65 407

9.1. Fair value hedges of interest rate, foreign currency and inflation risk

The Bank used 13 interest rate swaps to hedge the interest rate risk of a pool of mortgage loans. The changes in fair value of these interest rate swaps substantially offset the changes in fair value of the mortgage loans in relation to changes of interest rates.

The Bank used 28 interest rate swaps to hedge the interest rate risk of a pool of current accounts. The changes in fair value of these interest rate swaps substantially offset the changes in fair value of the current accounts in relation to changes of interest rates.

The Bank used 9 interest rate swaps to hedge the interest rate risk of 6 fixed rate state bonds from the FVOCI portfolio. The changes in fair value of these swaps substantially offset the changes in fair value of FVOCI portfolio bonds in relation to changes of interest rates.

The Bank used 1 interest rate swap to hedge the inflation and interest rate risk of 1 inflation bond from the FVOCI portfolio. The changes in fair value of interest rate swap substantially offset the changes in fair value of inflation bond in relation to both changes of interest rates and inflation reference index.

The Bank used 19 interest rate swaps to hedge the interest rate risk of 19 fixed rate financial institutions bonds from the FVOCI portfolio. The changes in fair value of these swaps substantially offset the changes in fair value of FVOCI portfolio bonds in relation to changes of interest rates.

The Bank used 8 interest rate swaps and one cross currency swap to hedge the interest rate risk of 8 corporate loans. The changes in fair value of these swaps substantially offset the changes in fair value of the loans in relation to changes of interest rates.

The Bank used 2 cross currency swaps to hedge the interest rate and foreign currency risk of 2 corporate loans denominated in GBP and USD. The changes in fair value of these swaps substantially offset the changes in fair value of the loans in relation to changes of both interest rates and foreign exchange rates.

The Bank used 1 interest rate swap to hedge the interest rate risk of 1 loan received from European Investment Bank ('EIB'). The changes in fair value of this interest rate swap substantially offset the changes in fair value of this loan in relation to changes of interest rates.

The Bank used 28 interest rate swaps to hedge the interest rate risk arising from the issuance of 16 fixed rate covered bonds. The changes in fair value of these interest rate swaps substantially offset the changes in fair value of the covered bonds in relation to changes of interest rates.

9. Derivatives – Hedge accounting (continued)

June 2021 **€ '000**	**Assets** **Fair values**	**Liabilities** **Fair values**	**Assets** **Notional values**	**Liabilities** **Notional values**	**Change in fair value used for calculating hedge ineffective -ness**	**Ineffectiv-ness recogni-sed in profit or loss**
Micro hedges						
Interest rate instruments:						
Swaps						
Hedge of debt securities at FVOCI	718	12 759	797 000	797 000	13 751	1
Hedge of corporate loans	2 387	1 948	246 124	246 124	2 865	(15)
Hedge of loans received from EIB	-	30	50 000	50 000	(569)	7
Hedge of covered bonds	45 562	2 328	2 300 400	2 300 400	(24 187)	-
Foreign currency instruments:						
Swaps						
Hedge of corporate loans	718	12 759	797 000	797 000	13 751	1
Macro hedges						
Interest rate instruments:						
Swaps						
Hedge of mortgage loans	1 454	10 602	1 670 000	1 670 000	7 013	(61)
Hedge of current accounts	5 769	615	1 217 500	1 217 500	(1 919)	(58)

9. Derivatives – Hedge accounting (continued)

December 2020 **€ '000**	**Assets** **Fair values**	**Liabilities** **Fair values**	**Assets** **Notional values**	**Liabilities** **Notional values**	**Change in fair value used for calculating hedge ineffective-ness**	**Ineffectiv-ness recogni-sed in profit or loss**
Micro hedges						
Interest rate instruments:						
Swaps						
Hedge of debt securities at FVOCI	7 712	36 754	1 084 900	1 084 900	(17 430)	-
Hedge of corporate loans	436	2 954	277 418	277 418	(1 829)	339
Hedge of loans received from EIB	533	-	50 000	50 000	1 323	16
Hedge of covered bonds	67 951	-	1 145 400	1 145 400	40 565	-
Foreign currency instruments:						
Swaps						
Hedge of corporate loans	68	5 838	91 532	86 805	(3 594)	-
Macro hedges						
Interest rate instruments:						
Swaps						
Hedge of mortgage loans	979	19 861	2 300 000	2 300 000	(6 468)	240
Hedge of current accounts	7 513	-	112 500	112 500	2 445	35

9. Derivatives – Hedge accounting (continued)

The amounts relating to items designated as hedged items were as follows:

June 2021 € '000	Line item in SOFP	Carrying amount	Accumulated amount of fair value adjustments included in carrying amount	Change in fair value used for calculating hedge ineffectiveness	Accumulated amount of fair value adjustment after termination of hedging relationship*
Micro hedges					
Debt securities at FVOCI	Financial assets at FVOCI	1 165 037	-	(13 750)	(125)
Corporate loans	Financial assets at AC: Due from customers	332 741	169	(5 735)	865
Loans received from EIB	Financial assets at AC: Due to banks	50 000	19	(576)	-
Covered bonds	Financial liabilities at AC: Debt securities in issue	1 239	41 620	(24 187)	41 321
Macro hedges					
Mortgage loans	Financial assets at AC: Due from customers	1 670 000	9 391	(7 074)	2 744
Current accounts	Financial liabilities at AC: Due to customers	1 217 500	5 129	(1 861)	-

* Interest rate risk hedging of covered bonds is sometimes closed before the original maturity of the interest rate swap. The reason is that the Interest rate risk position of the Bank changed in a way, which required more fixed rate liabilities. And since the originally fixed rate covered bonds were in the past swapped into float rate, these swaps were early terminated in order to achieve the required interest risk position of the Bank.

9. Derivatives – Hedge accounting (continued)

December 2020 € '000	**Line item in SOFP**	**Carrying amount**	**Accumulated amount of fair value adjustments included in carrying amount**	**Change in fair value used for calculating hedge ineffectiveness**	**Accumulated amount of fair value adjustment after termination of hedging relationship***
Micro hedges					
Debt securities at FVOCI	Financial assets at FVOCI	1 014 069	-	17 430	(3 108)
Corporate loans	Financial assets at AC: Due from customers	364 223	5 946	5 762	928
Loans received from EIB	Financial assets at AC: Due to banks	50 000	595	1 307	-
Covered bonds	Financial liabilities at AC: Debt securities in issue	733 786	65 807	40 565	45 372
Macro hedges					
Mortgage loans	Financial assets at AC: Due from customers	2 300 000	19 396	6 708	620
Current accounts	Financial liabilities at AC: Due to customers	112 500	6 990	2 410	-

* Interest rate risk hedging of covered bonds is sometimes closed before the original maturity of the interest rate swap. The reason is that the Interest rate risk position of the Bank changed in a way, which required more fixed rate liabilities. And since the originally fixed rate covered bonds were in the past swapped into float rate, these swaps were early terminated in order to achieve the required interest risk position of the Bank.

10. Financial assets at fair value through other comprehensive income

€ '000	June 2021	December 2020
Government debt securities of European Union countries	977 866	1 271 994
of which Italian government debt securities	*421 688*	*492 007*
Bank debt securities	323 479	304 864
Other debt securities	33 371	33 851
Equity instruments:		
Visa Inc. Series A Preferred Stock	7 673	6 952
Intesa Sanpaolo S.p.A.	44	326
S.W.I.F.T.	85	80
	7 802	7 358
	1 342 518	1 618 067

As at 30 June 2021, the bonds in the total nominal amount of € 1 193 849 thousand were pledged by the Bank to secure collateralized transactions (31 December 2020: € 583 000 thousand). These bonds were pledged in favor of the ECB within the pool of assets which can be immediately used as collateral for received funds needed for liquidity management purposes.

11. Financial assets and financial liabilities at amortised cost

11.1. Due from other banks

€ '000	Note	June 2021	December 2020
Term deposits		14	-
Loans and advances		146 160	149 755
Cash collateral		51 668	56 371
Impairment losses	21	(207)	(706)
		197 635	205 420

11.2. Due from customers

June 2021 € '000	Gross amount	Impairment losses (note 21)	Carrying amount
Public Administration			
State administration	127 884	(19)	127 865
Municipalities	111 812	(2 236)	109 576
	239 696	(2 255)	237 441
Corporate			
Large Corporates	2 093 074	(1 894)	2 091 180
Large Corporates – debt securities	129 295	(119)	129 176
Specialized Lending	906 546	(36 716)	869 830
SME	1 476 501	(46 214)	1 430 287
Other Non-banking Financial Institutions	517 658	(402)	517 256
Other Non-banking Financial Institutions - Debt securities	80 251	(55)	80 196
Public Sector Entities	2 577	(84)	2 493
Factoring	119 740	(1 107)	118 633
	5 325 642	(86 591)	5 239 051
Retail			
Small Business	292 338	(14 729)	277 609
Consumer Loans	1 360 327	(121 559)	1 238 768
Mortgages	8 240 501	(44 355)	8 196 146
Credit Cards	103 267	(14 383)	88 884
Overdrafts	68 323	(6 390)	61 933
Flat Owners Associations	37 654	(222)	37 432
	10 102 410	(201 638)	9 900 772
	15 667 748	(290 484)	15 377 264

11. Financial assets and financial liabilities at amortised cost (continued)

December 2020 **€ '000**	**Gross amount**	**Impairment losses (note 21)**	**Carrying amount**
Public Administration			
Single Resolution Fund	5 090	-	5 090
State administration	32 685	(3)	32 682
Municipalities	115 144	(2 672)	112 472
	152 919	(2 675)	150 244
Corporate			
Large Corporates	2 120 564	(5 155)	2 115 409
Large Corporates – debt securities	150 427	(265)	150 162
Specialized Lending	891 694	(33 742)	857 952
SME	1 413 483	(41 072)	1 372 411
Other Non-banking Financial Institutions	431 751	(171)	431 580
Other Non-banking Financial Institutions - Debt securities	50 056	(48)	50 008
Public Sector Entities	1 284	(47)	1 237
Factoring	83 887	(1 231)	82 656
	5 143 146	(81 731)	5 061 415
Retail			
Small Business	270 146	(14 112)	256 034
Consumer Loans	1 391 046	(133 946)	1 257 100
Mortgages	7 847 341	(41 648)	7 805 693
Credit Cards	104 092	(17 558)	86 534
Overdrafts	76 581	(6 421)	70 160
Flat Owners Associations	37 176	(219)	36 957
	9 726 382	(213 904)	9 512 478
	15 022 447	(298 310)	14 724 137

11.3. Due to banks

€ '000	**June 2021**	**December 2020**
Due to central banks:		
Current accounts	1 208	1 458
Loans received from central banks	999 806	-
	1 001 014	1 458
Due to other banks:		
Current accounts	85 204	27 464
Term deposits	7 227	8 170
Loans received from other banks	102 719	109 215
Revaluation of fair value hedged loans received	19	595
Cash collateral received	31 629	23 769
	226 798	169 213
	1 227 812	170 671

11. Financial assets and financial liabilities at amortised cost (continued)

11.4. Due to customers

€ '000	June 2021	December 2020
Current accounts	9 914 070	9 534 207
Term deposits	1 845 935	2 618 892
Government and municipal deposits	567 859	486 233
Savings accounts	222 945	229 480
Other deposits	209 498	109 148
	12 760 307	12 977 960

11.5. Lease liabilities

€ '000	June 2021	December 2020
Lease liabilities	22 259	22 858

11.6. Subordinated debt

€ '000	June 2021	December 2020
Subordinated debt	200 134	200 151

As at 30 June 2021, the balance of subordinated debt comprised of one ten-year loan in the nominal amount of € 200 000 thousand (31 December 2020: € 200 000 thousand) from Intesa Sanpaolo Holding International S. A. Maturity is in 2026. In accordance with the loan agreement, the loan as an unsecured obligation, can be used for the settlement of the debts of the Bank and shall not be repaid prior to repayment of all claims of the Bank's non-subordinated creditors.

11.7. Debt securities in issue

€ '000	June 2021	December 2020
Covered bonds	2 528 699	2 577 764
Covered bonds subject to fair value hedges	1 238 980	733 786
	3 767 679	3 311 550
Revaluation of fair value hedged covered bonds	41 620	65 807
Unamortized part of revaluation related to terminated fair value hedges	41 321	45 372
	3 850 620	3 422 729

The repayment of covered bonds is funded by the mortgage loans denominated in euro provided to customers of the Bank (note 11.2.) and debt securities in FVOCI portfolio (note 10).

11. Financial assets and financial liabilities at amortised cost (continued)

Name	Interest rate (%)	Currency	Number in circulation as at 31 June 2021	Nominal value in original currency per piece	Issue date	Maturity date	June 2021 € '000	December 2020 € '000
Mortgage bonds VÚB, a. s. 30.	5,000	EUR	1 000	33 194	5.9.2007	5.9.2032	34 352	33 513
Mortgage bonds VÚB, a. s. 31.	4,900	EUR	600	33 194	29.11.2007	29.11.2037	20 261	19 766
Mortgage bonds VÚB, a. s. 43.	5,100	EUR	500	33 194	26.9.2008	26.9.2025	16 831	16 359
Mortgage bonds VÚB, a. s. 67.	5,350	EUR	300	50 000	29.11.2011	29.11.2030	15 473	15 071
Mortgage bonds VÚB, a. s. 72.	4,700	EUR	250	100 000	21.6.2012	21.6.2027	24 933	25 512
Mortgage bonds VÚB, a. s. 73.	4,200	EUR	500	100 000	11.7.2012	11.7.2022	51 995	50 924
Mortgage bonds VÚB, a. s. 74.	3,350	EUR	700	100 000	16.1.2013	15.12.2023	70 958	72 107
Mortgage bonds VÚB, a. s. 81.	2,550	EUR	38	1 000 000	27.3.2014	27.3.2024	38 613	39 163
Mortgage bonds VÚB, a. s. 85.	2,250	EUR	500	100 000	14.11.2014	14.11.2029	50 303	49 717
Mortgage bonds VÚB, a. s. 87.	1,250	EUR	1 000	100 000	9.6.2015	9.6.2025	98 591	99 030
Mortgage bonds VÚB, a. s. 89.	1,200	EUR	1 000	100 000	29.9.2015	29.9.2025	100 375	99 713
Mortgage bonds VÚB, a. s. 90.	1,600	EUR	1 000	100 000	29.10.2015	29.10.2030	99 432	98 544
Mortgage bonds VÚB, a. s. 91.	0,600	EUR	1 000	100 000	21.3.2016	21.3.2023	100 000	100 251
Mortgage bonds VÚB, a. s. 93.	0,500	EUR	2 500	100 000	18.1.2017	18.1.2024	249 270	249 637
Mortgage bonds VÚB, a. s. 94.	1,050	EUR	2 500	100 000	27.4.2017	27.4.2027	247 998	249 099
Mortgage bonds VÚB, a. s. 95.	0,375	EUR	2 500	100 000	26.9.2017	26.9.2022	250 225	249 562
Covered bonds VÚB, a. s. 1	0,500	EUR	2 500	100 000	26.6.2018	26.6.2023	249 550	250 066
Covered bonds VÚB, a. s. 2	1,500	EUR	500	100 000	5.10.2018	15.12.2027	50 338	49 958
Covered bonds VÚB, a. s. 3	0,250	EUR	5 000	100 000	26.3.2019	26.3.2024	497 908	498 105
Covered bonds VÚB, a. s. 4	0,500	EUR	5 000	100 000	26.6.2019	26.6.2029	496 038	497 081
Covered bonds VÚB, a. s. 5	0,010	EUR	5 000	100 000	23.6.2020	23.6.2025	499 745	499 739
							3 767 679	3 311 550

12. Fair value changes of the hedged items in portfolio hedge of interest rate risk

€ '000	June 2021	December 2020
Financial assets at AC:		
Due from customers:		
Retail		
Mortgages	12 135	20 016
Financial liabilities at AC:		
Due to customers	5 129	6 990

13. Investments in subsidiaries, joint ventures and associates

June 2021 € '000	Share	Cost	Impairment losses (note 21)	Carrying amount
VÚB Leasing, a. s.	100,00%	74 410	(21 381)	53 029
VÚB Generali d. s. s., a. s.	50,00%	16 597	-	16 597
Slovak Banking Credit Bureau, s. r. o.	33,33%	3	-	3
		91 010	(21 381)	69 629

December 2020 € '000	Share	Cost	Impairment losses (note 21)	Carrying amount
VÚB Leasing, a. s.	100,00%	74 410	(21 381)	53 029
VÚB Generali d. s. s., a. s.	50,00%	16 597	-	16 597
Slovak Banking Credit Bureau, s. r. o.	33,33%	3	-	3
		91 010	(21 381)	69 629

VÚB Leasing, a. s., VÚB Generali d. s. s., a. s. and Slovak Banking Credit Bureau, s. r. o. are incorporated in the Slovak Republic.

14. Property and equipment and Non-current assets classified as held for sale

June 2021 **€ '000**	**Owned**	**Right-of-use**	**Total**
Buildings and land	77 244	18 044	95 288
Equipment	6 245	-	6 245
Other tangibles	1 274	4 038	5 312
Assets in progress	3 236	-	3 236
	87 999	22 082	110 081

December 2020 **€ '000**	**Owned**	**Right-of-use**	**Total**
Buildings and land	75 648	18 421	94 069
Equipment	6 419	-	6 419
Other tangibles	1 181	4 309	5 490
Assets in progress	7 186	-	7 186
	90 434	22 730	113 164

2021 **€ '000**	**Buildings and land**	**Equipment**	**Other tangibles**	**Assets in progress**	**Total**
Cost or fair value					
As at 1 January	109 393	53 139	30 286	7 186	200 004
Additions	2 930	-	272	496	3 698
Disposals	(6 338)	(1 304)	(1 289)	-	(8 931)
Transfers	3 400	762	284	(4 446)	-
Exchange differences	9	6	1	-	16
As at 30 June	109 394	52 603	29 554	3 236	194 787
Accumulated depreciation					
As at 1 January	(14 975)	(46 720)	(24 796)	-	(86 491)
Depreciation for the period	(5 076)	(935)	(719)	-	(6 730)
Disposals	6 301	1 302	1 274	-	8 877
Exchange differences	(7)	(5)	(1)	-	(13)
As at 30 June	(13 757)	(46 358)	(24 242)	-	(84 357)
Impairment losses (note 21)					
As at 1 January	(349)	-	-	-	(349)
As at 31 June	(349)	-	-	-	(349)
Carrying amount					
As at 1 January	94 069	6 419	5 490	7 186	113 164
As at 30 June	95 288	6 245	5 312	3 236	110 081

15. Intangible assets

2021 € '000	Software	Other intangible assets	Assets in progress	Total
Cost				
As at 1 January	294 222	10 729	55 923	360 874
Additions	-	-	6 060	6 060
Disposals	(62)	-	-	(62)
Transfers	6 831	-	(6 831)	-
Exchange differences	27	-	-	27
As at 31 June	301 018	10 729	55 152	366 899
Accumulated amortisation				
As at 1 January	(221 607)	(10 371)	-	(231 978)
Amortization for the period	(7 941)	(61)	-	(8 002)
Disposals	12	-	-	12
Exchange differences	(22)	-	-	(22)
As at 30 June	(229 558)	(10 432)	-	(239 990)
Carrying amount				
As at 1 January	72 615	358	55 923	128 896
As at 30 June	71 460	297	55 152	126 909

16. Goodwill

€ '000	June 2021	December 2020
Retail Banking	18 871	18 871

The merger of Consumer Finance Holding, a. s. into the Bank in 2018 led to the recognition of goodwill previously held by Consumer Finance Holding, a. s. The Bank allocated this goodwill to cash generating unit Retail Banking, as Consumer Finance Holding, a. s. was operating in the area of consumer loans.

The Bank identified three cash generating units– Retail Banking, Corporate Banking and Central Treasury, which also representing the operating segment considered for segment reporting (note 6). Each of them constitutes the smallest group of assets generating independent incoming cash flows and also the minimum level set by the Bank for planning and reporting processes.

Goodwill is tested for impairment annually or more frequently, if events or changes in circumstances indicate that the carrying value may be impaired. No impairment losses on goodwill were recognized during 2021 and 2020.

17. Current and deferred income tax assets and liabilities

€ '000	June 2021	December 2020
Current income tax assets	14 222	26 518
Deferred income tax assets	45 621	51 056
Current income tax liabilities	328	635

Deferred income taxes are calculated on all temporary differences using a tax rate of 21% (31 December 2020: 21%) as follows:

€ '000	June 2021	Profit/ (loss) (note 34)	Equity	Exchange differences	December 2020
Financial assets at FVOCI	(1 236)	-	1 271	-	(2 507)
Financial assets at AC:					
Due from other banks	43	(75)	-	-	118
Due from customers	43 208	(5 904)	-	-	49 112
Property and equipment	(12 543)	(86)	-	-	(12 457)
Other assets	7	-	-	-	7
Financial liabilities at AC:					
Lease liabilities	4 676	(125)	-	-	4 801
Provisions	2 811	57	-	-	2 754
Other liabilities	7 385	(691)	-	-	8 076
Other	1 270	112	(1)	7	1 152
	45 621	(6 712)	1 270	7	51 056

18. Other assets

€ '000	Note	June 2021	December 2020
Operating receivables and advances		10 552	13 865
Prepayments and accrued income		4 966	9 857
Inventories		792	381
Other tax receivables		386	712
Settlement of operations with financial instruments		9	12
Impairment losses	21	(1 824)	(2 142)
		14 881	22 685

19. Provisions

€ '000	Note	June 2021	December 2020
Financial guarantees and commitments	21	14 749	13 904
Restructuring provision		600	591
Litigation	23	400	400
		15 749	14 895

2021 € '000	Note	1 January	Net creation	Use	30 June
Litigation	23, 32	591	10	(1)	600
Restructuring provision	32	400	-	-	400
		991	10	(1)	1 000

20. Other liabilities

€ '000	June 2021	December 2020
Various creditors	33 293	38 110
Settlement with employees	27 531	27 208
Severance and Jubilee benefits	5 407	5 407
Settlement of operations with financial instruments	4 205	1
Accruals and deferred income	2 572	2 211
VAT payable and other tax payables	1 194	1 626
Settlement with shareholders	905	1 404
Share remuneration scheme	894	711
Investment certificates	544	843
Other	2 310	2 211
	78 855	78 495

At 30 June 2021 and 31 December 2020 there were no overdue balances within 'Other liabilities'.

Severance and Jubilee benefits are discounted to determine their present value. The discount rate is determined by reference to yield curve on Slovak government bonds with a fifteen years duration that represents the period which is closest to the average benefit duration. The calculation is performed using the Projected Unit Credit Method. For the calculation the Bank used an average turnover rate which is based on historical data on employees' turnover at the Bank for the last three years. The average age-specific turnover rate is calculated as the ratio of number of terminations and the average number of employees. All employees are covered by the retirement and jubilee employee benefits program.

The calculation for the respective program takes into account the following parameters:

	Jubilee benefits	Retirement benefits
Discount rate	(0,66)%	(0,11)%
Growth of wages*	-	0,00%
Future growth of wages*	-	4,50%
Turnover rate (based on age)	5,1% – 40,9%	5,1% – 40,9%
Retirement age	Based on valid legislation	
Mortality	Based on mortality tables issued by the Statistical Office of the Slovak Republic	

* Growth of wages and Future growth of wages is not part of calculation for Jubilee benefits.

21. Movements in impairment losses and provisions for financial guarantees and commitments

2021 € '000	Note	1 January	Net creation/ (release) (note 33)	Assets written-off/sold	Exchange difference	Other*	30 June
Financial assets at FVOCI		306	6	-	-	-	312
Financial assets at AC:	11						
Due from other banks		706	(492)	-	(7)	-	207
Due from customers		298 310	17 023	(21 317)	(660)	(2 872)	290 484
Impairment losses according to IFRS 9		299 322	16 537	(21 317)	(667)	(2 872)	291 003
Financial guarantees and commitments	19	13 904	29	-	816	-	14 749
Impairment losses and provisions according to IFRS 9		313 226	16 566	(21 317)	149	(2 872)	305 752
Investments in subsidiaries, joint ventures and associates	13	21 381	-	-	-	-	21 381
Property and equipment and Non-current assets classified as held for sale	14	349	-	-	-	-	349
Other assets	18	2 142	(318)	-	-		1 824
Total impairment losses and provisions for financial guarantees and commitments		337 098	16 248	(21 317)	149	(2 872)	329 306

* 'Other' represents:

- the interest portion (unwinding of interest).

22. Equity

€ '000	June 2021	December 2020
Share capital - authorised, issued and fully paid:		
89 ordinary shares of € 3 319 391.89 each, not traded	295 426	295 426
4 078 108 ordinary shares of € 33.2 each, publicly traded	135 393	135 393
	430 819	430 819
Share premium	13 719	13 719
Reserves	109 686	114 484
Retained earnings (excluding net profit for the period)	1 134 385	1 049 185
	1 688 609	1 608 207

In accordance with the law and statutes of the Bank, the Bank is obliged to contribute at least 10% of its annual net profit to the 'Legal reserve fund' until it reaches 20% of the share capital. Usage of the 'Legal reserve fund' is restricted by the law and the fund can be used for the coverage of the losses of the Bank.

	June 2021	June 2020
Net profit for the period attributable to shareholders in € '000	57 665	13 989
Divided by the weighted average number of ordinary shares, calculated as follows:		
89 ordinary shares of € 3 319 391.89 each in €	295 425 878	295 425 878
4 078 108 ordinary shares of € 33.2 each in €	135 393 186	135 393 186
	430 819 064	430 819 064
Divided by the value of one ordinary share of € 33.2		
The weighted average number of ordinary shares of € 33.2 each	12 976 478	12 976 478
Basic and diluted earnings per € 33.2 share in €	4,44	1,08

The rights and responsibilities of shareholders are set out in the legal regulations and the Articles of Association of the Bank. The right of a shareholder to participate in the management of the Bank, the right to a share of the profits and the right to a share of the liquidation balance, in the event of the winding up of the Bank with liquidation, are attached to a registered share. Each shareholder is entitled to attend the General Meeting, to vote, to request information and seek explanations and submit proposals. The number of votes allocated to each shareholder is determined by the ratio of the nominal value of its share to the amount of registered capital. A shareholder may exercise the shareholder rights attached to book-entered shares at the General Meeting if the shareholder is entitled to exercise these rights as of the decisive date specified in the invitation to the General Meeting. The exercise of a shareholder's voting rights may only be restricted or suspended by the law. The shares are freely transferable by registration of transfer in line with relevant regulation. The General Meeting of the Bank as the main decision making body of the Bank is entitled to decide on share issues or on the acquisition of the Bank's own shares.

The structure of shareholders is as follows:

€ '000	June 2021	December 2020
Intesa Sanpaolo Holding International S. A.	100,00%	97,03%
Domestic shareholders	0,00%	2,17%
Foreign shareholders	0,00%	0,80%
	100,00%	100,00%

22. Equity (continued)

The primary objectives of the Bank's capital management are to ensure that the Bank complies with externally imposed capital requirements and that the Bank maintains strong credit ratings and healthy capital ratios in order to support its business and to maximise shareholders' value.

The Bank manages its capital structure and makes adjustments to it in the light of changes in economic conditions and the risk characteristics of its activities. In order to maintain or adjust the capital structure, the Bank may adjust the amount of dividend payment to shareholders, return capital to shareholders or issue capital securities. No changes have been made in the objectives, policies and processes from the previous years.

The Bank's regulatory capital position was determined based on the rules for capital adequacy calculation set by the CRR Regulation:

€ '000	**June 2021**	**December 2020**
Tier 1 capital		
Share capital	430 819	430 819
Share premium	13 719	13 719
Retained earnings*	1 125 921	1 040 721
Legal reserve fund	95 957	87 493
Other capital funds	-	8 464
Accumulated other comprehensive income	22 193	26 991
(-) Value adjustments due to the requirements for prudent valuation	(25)	(47)
Other transitional adjustments to CET1 Capital	20 674	28 944
CET1 capital elements or deductions – other	(6 401)	(5 090)
Less goodwill and intangible assets	(118 959)	(118 379)
Less IRB shortfall of credit risk adjustments to expected losses	(3 177)	(8 416)
(-) Insufficient coverage for non-performing exposures	(25)	-
	1 580 696	1 505 219
Tier 2 capital		
IRB excess of provisions over expected losses eligible	2 392	-
Subordinated debt	200 000	200 000
Other transitional adjustments to T2 Capital	(5 141)	(7 197)
	197 251	192 803
Total regulatory capital	1 777 947	1 698 022

* Excluding net profit for the period, profit in approval and other capital funds.

€ '000	**June 2021**	**December 2020**
Retained earnings	1 192 050	1 134 224
Profit in approval	-	-
Net profit for the period/year	(57 665)	(85 039)
Other capital funds	(8 464)	(8 464)
	1 125 921	1 040 721

€ '000	**June 2021**	**December 2020**	**June 2021 Required**	**December 2020 Required**
Tier 1 capital	1 580 696	1 505 219	705 276	698 077
Tier 2 capital	197 251	192 803	197 251	192 803
Total regulatory capital	1 777 947	1 698 022	705 276	698 077
Total Risk Weighted Assets	8 815 947	8 725 964	8 815 947	8 725 964
CET 1 capital ratio	17,93%	17,25%	11,84%	11,84%
Total capital ratio	20,17%	19,46%	16,00%	16,00%

22. Equity (continued)

Regulatory capital consists of Tier 1 capital, which comprises share capital, share premium, retained earnings without profit for the current year, accumulated other comprehensive income, foreign currency translation and reserves. The deducted amounts in Tier 1 capital are goodwill, intangible assets and irrevocable payment commitments (contribution to Single Resolution Fund) and IRB shortfall. Certain adjustments are made to IFRSs-based results and reserves, as prescribed by the CRR Regulation. The other component of regulatory capital is Tier 2 capital, which includes subordinated long term debt and IRB excess of provisions over expected losses.

Own Funds, risk-weighted assets and the capital ratios as at 30 June 2021 and 31 December 2020 were calculated according to the harmonised rules and regulations for banks and investment companies contained in Directive 2013/36/EU ('CRD IV') and in the CRR Regulation of 26 June 2013, which transpose the banking supervision standards defined by the Basel Committee (the Basel 3 Framework) to European Union laws.

Following the Supervisory Review and Evaluation Process ('SREP'), the ECB annually makes a final decision on the capital requirement that the Bank must comply with on sub-consolidated and individual level. Starting from 1 January 2020, the overall capital requirement the Bank has to meet in terms of Common Equity Tier 1 ratio is 10.5%. This is the result:

- the SREP requirement comprising a minimum Pillar 1 capital requirement of 4.5% and an additional Pillar 2 capital requirement of 1.5%, entirely of Common Equity Tier 1 ratio;
- additional requirements, made up entirely of Common Equity Tier 1 ratio, relating to a Capital Conservation Buffer of 2.5%, and an Other Systemically Important Institutions Buffer ('O-SII Buffer') of 1% and Systemic Risk Buffer ('SRB') of 1%.

For the sake of completeness, please note that CRD IV establishes the obligation for the designated national authorities to activate an operational framework for the definition of the ratio of the countercyclical capital buffer ('CCyB') starting from 1 January 2016. The ratio is subject to review on a quarterly basis. The European regulation was implemented in Slovakia by National Bank of Slovakia in relevant regulation, which contains suitable regulations concerning CCyB. Based on the analysis of the reference indicators, the National Bank of Slovakia decided to set the countercyclical ratio (relating to the exposures towards Slovak counterparties) for period starting 1 August 2017 at 0.5%, since 1 August 2018 at 1.25%, since 1 August 2019 at 1.5%. Due to COVID-19 pandemic situation, since 1 August 2020 NBS decreased countercyclical buffer to 1% (bringing the total CET1 capital requirement to 13% since 1 January 2020 including Pillar 2 Capital Guidance buffer of 1%). On 12 June 2020, ECB announced relaxation of the capital requirements in relation to COVID-19 pandemic, by allowing the banks to fully release the P2CG (1%) and allow banks to operate temporarily below the level of capital defined by the capital conservation buffer (CCB) (2.5%), meaning in total effect of 3.5%. Moreover, requirement on P2R composition based on CRD V rules has been updated to 75% Tier 1, out of which 75% should represent CET 1 (56.25% of P2R). These changes represent from 31 June 2020 capital requirement for CET 1 of 12.34% and capital requirement for Tier 1 of 14.13% and from 1 August 2020 (reduction of the countercyclical buffer to 1%) it represents capital requirement for CET 1 of 11.84% and capital requirement for Tier 1 of 13.63%.

The Overall Capital Requirement was at the Bank level, as of 1 January 2020 set at 16.5% and from 1 August 2020 at 16% and cosists of:

- capital requirement for Pillar 1 (8%),
- capital requirement for Pillar 2 (SREP add on 1.5% and Pillar 2 Capital Guidance 1%),
- capital requirement for a combined buffer (6%), consisting of Capital Conservation Buffer of 2.5%, and Other Systemically Important Institutions Buffer of 1% and Systemic Risk Buffer of 1% and a CounterCyclical Buffer 1.5%.

The CounterCyclical Buffer requirement has been reduced to 1% since 1 August 2020 and the Overall Capital Requirement has similarly been reduced to 16%.

Since November 2014, the Bank has been under the supervision of the European Central Bank.

Internally, within its Risk Appetite framework, the Bank has set internal limits for both OCR and CET1, managing the regulatory capital requirements additionally with an internal management buffer.

22. Equity (continued)

Impact of the introduction of IFRS 9 on own funds

In December 2017, the European Parliament and the European Council issued Regulation (EU) No 2017/2395 amending the CRR Regulation as regard transitional arrangements for mitigating the impact of the introduction of IFRS 9 on own funds, integrating the CRR Regulation with Article 473 "Introduction of IFRS 9". The new Article allows Banks to re-introduce in their Common Equity Tier 1 ('CET 1') a decreasing quota of the impact of IFRS 9 in a five-year transitional period (2018 – 2022). That amount shall be determined using the static approach which will be adopted by the Bank. It refers only to the impact of FTA resulting from the comparison of IAS 39 impairments as at 31 December 2017 and IFRS 9 impairments as at 1 January 2018 – including both performing loans classified in Stages 1 and 2 and adjustments to non-performing loans (Stage 3) – to which is applied a decreasing factor (95% for 2018, 85% in 2019, 70% in 2020, 50% in 2021 and 25% in 2022) to set the amount to be included in CET 1. The static transitional approach is not applicable to the changes in valuation reserves deriving from re-classification of financial instruments during FTA (impact resulting from classification and measurement).

€ '000	**2018**	**2019**	**2020**	**2021**	**2022**
Decreasing factor	95%	85%	70%	50%	25%
Impact to CET 1	39 281	35 146	28 944	20 674	10 337

Furthermore, under paragraph 7 of Article 473 of the CRR Regulation, ISP Group companies adopting the transitional approach shall update calculation of the following components relevant to the determination of supervisory capital requirements, so as to avoid inappropriate benefits:

- Deferred tax assets deducted from CET 1 relating to Standard and Internal ratings-based ('IRB') exposures;
- Determination of Exposure At Default using the scaling factor to assess the Risk Weighted Assets of Standard exposures;
- Tier 2 elements relating to IRB weighted exposures.

The impact on own funds of the first-time adoption of IFRS 9 and the adoption of the "static" approach during the transitional period (2018 – 2022), as permitted by Regulation (EU) 2017/2395, resulted in the effects on regulatory capital and prudential ratios (with and without applying the transitional provisions for IFRS 9) following:

- the reduction of CET 1, due to the FTA impact linked to the first-time adoption of IFRS 9,
- the increase in CET 1 due to the re-inclusion of the gradually decreasing transitional component as a result of the adoption of the adjustment introduced by the aforementioned Regulation, aimed at mitigating the impact of FTA;
- the increase in the excess reserve, based on the provisions of the aforementioned Regulation, may be added to the Tier 2 capital, up to the amount of 0.6% of IRB RWA, solely for the part in excess of the amount re-included in CET 1 as a result of the adoption of said transitional adjustment;
- the reduction of the risk-weighted assets (RWA) on standard exposures as at 1 January 2018, which as a result of the increase in the provisions linked to the first-time adoption of IFRS 9, reduced the risk exposure (EAD);
- the increase in risk-weighted assets (RWA) on standard exposures due to the application, under said provisions, of the scaling factor set out in Regulation (EU) 2017/2395 in line with static transitional approach.

Regulation (EU) 2020/873 of 24 June 2020 amending Regulations (EU) No 575/2013 and (EU) No 2019/876 as regards certain adjustments in response to the COVID-19 pandemic meaning amendments of the transitional arrangements for adoption of IFRS 9 (Art. 473a of CRR) the Bank continues to apply the static approach as defined for the first-time adoption of IFRS 9 in relation to own funds calculation, which is in line with ISP Group approach. Moreover, the Bank has decided not to adopt temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in view of the COVID-19 pandemic (Art. 468).

The prudential treatment of software assets

The Bank has adopted prudential treatment of software assets based on the Final Report "Draft Regulatory Technical Standards on the prudential treatment of software assets under Article 36 of Regulation (EU) No 575/2013 (CRR)", EBA/RTS/2020/07, regarding updated version of the Capital Requirements Regulation 2019/876 and Directive 2019/878 (CRR II/CRD V) published in June 2019 concerning the modified version of article 36(1)b (CRR II) with regard to own funds requirements for institutions. The Bank has adopted the prudential amortization approach for software assets for the calculation of CET1 at individual and consolidated level starting from December 2020 based on EBA/RTS/ 2020/07 methodology, which is in line with ISP Group Approach. The prudential amortization allows the banks not to deduct from CET1 software assets that are prudentially valued (i.e. when the value of software assets is not negatively affected by status of resolution, insolvency or liquidation of the bank). The residual portion of the carrying amount of software is risk-weighted (100%), in accordance with the current CRR provisions. This treatment has also been established by Commission delegated Regulation (EU) 2020/2176 of 12 November 2020 amending Delegated Regulation (EU) No 241/2014 as regards the deduction of software assets from Common Equity Tier 1 items.

23. Financial commitments and contingencies

23.1. Issued guarantees and commitments and undrawn credit facilities

€ '000	**June 2021**	**December 2020**
Issued guarantees	845 452	866 694
Commitments and undrawn credit facilities	5 367 910	4 012 294
of which revocable	*2 185 543*	*913 855*
	6 213 362	4 878 988

Issued guarantees represent irrevocable assurances that the Bank will make payments in the event that a borrower cannot meet its obligations to third parties. These assurances carry the same credit risk as loans and therefore the Bank recognizes provisions for these instruments. (note 19)

The primary purpose of commitments to extend credit is to ensure that funds are available to the customer as required. Commitments and undrawn credit facilities represent undrawn portions of commitments, credit facilities and approved overdraft loans.

23.2. Legal proceedings

In the normal course of business, the Bank is subject to a variety of legal actions. The Bank conducted a review of legal proceedings outstanding against it as of 31 December 2020. Pursuant to this review, management has recorded total provisions of € 600 thousand as at 30 June 2021 (31 December 2020: € 591 thousand) in respect of such legal proceedings (note 19). The Bank will continue to defend its position in respect of each of these legal proceedings. In addition to the legal proceedings covered by provisions, there are contingent liabilities arising from legal proceedings in the total amount of € 30 935 thousand, as at 30 June 2021 (31 December 2020: € 30 367 thousand). This amount represents existing legal proceedings against the Bank that will most probably not result in any payments due by the Bank.

24. Net interest income

€ '000	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Interest and similar income				
Financial assets at FVTPL	18	18	150	112
Financial assets at FVOCI	(99)	(164)	1 403	781
Financial assets at AC:				
Due from other banks	1 969	944	1 940	1 024
Due from customers	153 050	75 435	163 944	80 456
Derivatives - Hedge accounting	(9 223)	(4 504)	(7 414)	(3 319)
Interest income on liabilities	609	413	659	186
	146 324	72 142	160 682	79 240
Interest and similar expense				
Financial liabilities at AC:				
Due to banks	(199)	(132)	(334)	(142)
Due to customers and Subordinated debt	(6 350)	(3 009)	(10 236)	(4 491)
of which lease liabilities	*(116)*	*(56)*	*(83)*	*(40)*
Debt securities in issue	(11 436)	(5 490)	(15 066)	(7 308)
Derivatives - Hedge accounting	5 052	2 644	5 798	2 802
Interest expense on assets	(1 781)	(1 269)	(277)	(84)
	(14 714)	(7 256)	(20 115)	(9 223)
	131 610	64 886	140 567	70 017

€ '000	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Interest and similar income				
Total interest income calculated using the effective interest method	146 306	72 124	160 532	79 128
Other interest income - interest income on financial assets at FVTPL	18	18	150	112
	146 324	72 142	160 682	79 240

€ '000	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Net interest income				
Financial assets at FVOCI	(99)	(164)	1 403	781
Financial assets at AC	153 238	75 110	165 607	81 396
	153 139	74 946	167 010	70 215
Financial liabilities at AC	(17 376)	(8 218)	(24 977)	(11 755)

25. Net fee and commission income

Nature and timing of satisfaction of performance obligations, including significant payment terms:

Current accounts	Fees for ongoing account management are charged to the customer's account on a monthly basis. The Bank sets the rates separately for retail and corporate banking customers in each jurisdiction on an annual basis.
Cards	Credit card and debit card fees relate to both fees for issuance of credit card for the period of card's validity as well as fees for specific transactions.
Payments and cash management	Transaction-based fees for interchange and foreign currency transactions are charged to the customer's account when the transaction takes place.
Loans	Services for loans comprise mainly fees for overdrafts, which are recognised on a straight-line basis over the overdraft duration. They also include other servicing fees which are charged on a monthly basis and are based on fixed rates reviewed annually by the Bank.
Indirect deposits	These fees mainly relate to providing Bank's retail network for the mediation of investments into funds. These fees are paid to the Bank by VÚB Asset Management, správ. spol., a. s. Since the Bank does not have any ongoing performance obligation regarding these fees, they are recognised in full when charged.
Insurance	The Bank provides insurance mediation along with selling its products. Except for life insurance mediation, only aliquot part of commission is sent by the insurance company on monthly basis, therefore the Bank only recognises aliquot part of commission as income with the passage of time. In case client cancels insurance contract with insurance company, the insurance company stops paying the aliquot part of the commission and the Bank therefore stops to recognise these fees. The Bank is not liable to return aliquot part of commissions recognised in fees to insurance company. Regarding life insurance mediation the Bank is exposed to clawbacks if client cancels the insurance contract within certain periods. The Bank calculated effect of International Financial Reporting Standard 15 Revenue from Contracts with Customers ('IFRS 15') impact and evaluated this impact as non-material and continues to recognise income on these fees as the related mediation service is provided.
Trade finance, Structured finance	Fees for loan commitments which are not expected to result in the draw-down of a loan are recognised on a straight-line basis over the commitment period. Administration of a loan syndication, execution of client transactions with exchanges and securities underwriting, charges for premature termination of loans and other are charged when transaction takes place.
Factoring	Services related to factoring include: • Facility commitment, where fee is recognised on a straight-line basis over the commitment period; • Invoice processing fee, where fixed amount for each processed invoice is charged; • Factoring fee, where fee represent a percentage on a total receivable amount factored.

25. Net fee and commission income (continued)

Revenue recognition under IFRS 15:

Current accounts	Revenue from account service and servicing fees is recognised over time as the services are provided.
Cards	Revenue from card issuance is recognised over time as the services are provided.
	Revenue related to transactions is recognised at the point in time when the transaction takes place.
Payments and cash management	Revenue related to transactions is recognised at the point in time when the transaction takes place.
Loans	Overdraft fee is recognised on a straight-line basis over the overdraft duration.
	Revenue related to transactions is recognised at the point in time when the transaction takes place.
Indirect deposits	Revenue related to transactions is recognised at the point in time when the transaction takes place.
Insurance	Revenue from insurance mediation services is recognised over time for the duration of contract, except for life insurance mediation where service fee is recognised when service is provided and clawbacks are recognised when they occur.
Trade finance, Structured finance	Loan commitment fee is recognised on a straight-line basis over the commitment period.
	Revenue related to transactions is recognised at the point in time when the transaction takes place.
Factoring	Facility fee is recognised on a straight-line basis over the commitment period.
	Revenues related to invoice processing and factoring fee are recognised at the point in time when the transaction takes place.

25. Net fee and commission income (continued)

June 2021 6 months € '000	**Retail Banking**	**Corporate Banking**	**Central Treasury**	**Other**	**Total**
Fee and commission income					
Current accounts	18 318	1 780	-	6	20 104
Cards	12 890	104	-	29	13 023
Payments and cash management	6 752	4 031	380	1	11 164
Indirect deposits	10 242	21	-	-	10 263
Loans	5 575	3 717	-	180	9 472
Insurance	6 411	-	-	-	6 411
Trade finance	6	4 052	869	-	4 927
Structured finance	-	878	-	-	878
Factoring	-	720	-	-	720
Other	328	758	285	152	1 523
	60 522	16 061	1 534	368	78 485
Fee and commission expense					
Cards	(6 848)	-	-	-	(6 848)
Payments and cash management	(775)	(2 353)	(271)	(274)	(3 673)
Current accounts	-	-	-	(347)	(347)
Insurance	(213)	-	-	-	(213)
Factoring	-	(145)	-	-	(145)
Indirect deposits	-	1	-	-	1
Other	(88)	(2)	(248)	(1 477)	(1 815)
	(7 924)	(2 499)	(519)	(2 098)	(13 040)
Net fee and commission income under IFRS 15	52 598	13 562	1 015	(1 730)	65 445
Income from guarantees under IFRS 9	-	3 046	-	-	3 046
Total net fee and commission income	52 598	16 608	1 015	(1 730)	68 491

25. Net fee and commission income (continued)

June 2020 6 months € '000	**Retail Banking**	**Corporate Banking**	**Central Treasury**	**Other**	**Total**
Fee and commission income					
Current accounts	19 330	1 481	-	4	20 815
Payments and cash management	6 777	5 932	1 193	10	13 912
Cards	12 963	153	-	20	13 136
Loans	4 881	3 896	-	290	9 067
Indirect deposits	8 154	22	-	-	8 176
Insurance	5 931	2	-	-	5 933
Trade finance	5	3 536	796	-	4 337
Factoring	-	565	-	-	565
Structured finance	-	452	-	-	452
Other	338	240	105	-	683
	58 379	16 279	2 094	324	77 076
Fee and commission expense					
Cards	(7 587)	-	-	-	(7 587)
Payments and cash management	(815)	(2 358)	(221)	(246)	(3 640)
Current accounts	-	-	-	(241)	(241)
Insurance	(222)	-	-	-	(222)
Factoring	-	(119)	-	-	(119)
Other	(174)	-	(766)	(1 110)	(2 050)
	(8 798)	(2 477)	(987)	(1 597)	(13 859)
Net fee and commission income	49 581	13 802	1 107	(1 273)	63 217

June 2021 **3 months** **€ '000**	**Retail Banking**	**Corporate Banking**	**Central Treasury**	**Other**	**Total**
Fee and commission income					
Current accounts	8 822	893	-	4	9 719
Cards	7 337	55	-	21	7 413
Indirect deposits	5 383	10	-	-	5 393
Payments and cash management	3 681	1 037	240	1	4 959
Loans	2 981	1 875	-	102	4 958
Trade finance	5	3 592	320	-	3 917
Insurance	3 483	(1)	-	-	3 482
Factoring	-	403	-	-	403
Structured finance	-	261	-	-	261
Other	76	465	179	100	820
	31 768	8 590	739	228	41 325
Fee and commission expense					
Cards	(3 479)	-	-	-	(3 479)
Payments and cash management	(458)	(1 329)	(144)	(144)	(2 075)
Current accounts	-	-	-	(245)	(245)
Insurance	(104)	-	-	-	(104)
Factoring	-	(89)	-	-	(89)
Indirect deposits	-	1	-	-	1
Other	(67)	(2)	(61)	(749)	(879)
	(4 108)	(1 419)	(205)	(1 138)	(6 870)
Net fee and commission income under IFRS 15	27 660	7 171	534	(910)	34 455
Income from guarantees under IFRS 9	-	1 563	-	-	1 563
Total net fee and commission income	27 660	8 734	534	(910)	36 018

June 2020 **3 months** **€ '000**	**Retail Banking**	**Corporate Banking**	**Central Treasury**	**Other**	**Total**
Fee and commission income					
Current accounts	9 555	761	-	2	10 318
Payments and cash management	3 348	3 051	1 104	5	7 508
Cards	6 461	102	-	5	6 568
Loans	2 365	2 017	-	118	4 500
Indirect deposits	3 999	12	-	-	4 011
Insurance	2 949	1	-	-	2 950
Trade finance	2	1 832	286	-	2 120
Factoring	-	293	-	-	293
Structured finance	-	229	-	-	229
Other	153	83	105	-	341
	28 832	8 381	1 495	130	38 838
Fee and commission expense					
Cards	(3 531)	-	-	-	(3 531)
Payments and cash management	(387)	(1 154)	(7)	(114)	(1 662)
Current accounts	-	-	-	(147)	(147)
Insurance	(113)	-	-	-	(113)
Factoring	-	(72)	-	-	(72)
Other	(174)	-	(653)	(622)	(1 449)
	(4 205)	(1 226)	(660)	(883)	(6 974)
Net fee and commission income	24 627	7 155	835	(753)	31 864

26. Net trading result

€ '000	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Financial assets measured at FVOCI	6 139	27	270	224
Foreign currency derivatives and transactions	5 931	356	(1 701)	(1 337)
Customer foreign exchange margins	3 485	1 850	3 150	1 540
Interest rate derivatives	733	17	(1 494)	(1 551)
Financial assets held for trading - debt securities	400	570	1 669	1 642
Non-trading financial assets measured at FVTPL	135	(14)	(172)	46
Other derivatives	70	13	195	27
Dividends from equity shares measured at FVOCI	46	37	36	18
Net result from hedging transactions	(126)	37	909	650
Cross currency swaps	(3 741)	1 081	2 344	2 589
	13 072	3 974	5 206	3 848

27. Other operating income

€ '000	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Financial revenues	440	235	1 112	229
Net profit from sale of fixed assets	-	-	10	-
Služby	-	-	3	3
Other	563	492	200	97
	1 003	727	1 325	329

28. Other operating expenses

€ '000	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Contribution to the Single Resolution Fund*	(7 424)	(540)	(6 880)	(877)
Contribution to the Deposit Protection Fund**	(5 267)	-	(605)	-
Other damages	(168)	(131)	(12)	42
Other	(3 979)	(1 980)	(1 980)	(1 510)
	(16 838)	(2 651)	(10 775)	(2 345)

* Starting from 1 January 2015 the Bank Recovery and Resolution Directive No 2014/59/EU (‘BRRD’) is effective. The Directive was implemented to Slovak legislation by Act No 371/2014 on Resolution. The Directive sets an obligation for banks of the member states participating to the Banking Union to pay an annual contribution depending on the size and the risk profile of a bank to the National Resolution Fund in 2015 and to the Single Resolution Fund from 2016 up to the 2023.

** The annual contribution for 2021 was determined by the Deposit Protection Fund under the valid methodology. As at 30 June 2021, the Bank expensed the full amount of such contribution. The quarterly contribution to the Deposit Protection Fund for 2021 was set at 0.0075% p. q. of the amount of protected deposits.

29. Special levy of selected financial institutions

€ '000	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Special levy of selected financial institutions	-	-	(31 038)	(15 539)

From 1 January 2021, the Bank's obligation to pay the special levy of selected financial institutions ceases on the basis of Act no. 353/2020 Coll.

The special levy of selected financial institutions was set to 0.4% p. a. of selected liabilities for the year 2020. As at 21 July 2020, the amendment to Act no. 67/2020 Coll. on certain emergency financial measures in relation to the spread of dangerous contagious human disease COVID-19 became effective. This amendment also covered measures in the area of special levy of selected financial institutions. According to these measures no more special levy payments were required from July 2020 until the end of 2020.

30. Salaries and employee benefits

€ '000	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Remuneration	(42 120)	(20 947)	(42 396)	(21 258)
Social security costs	(15 942)	(8 040)	(16 612)	(8 326)
Social fund	(619)	(351)	(628)	(363)
Termination benefit	-	-	(150)	-
	(58 681)	(29 338)	(59 786)	(29 947)

As at 30 June 2021, the total number of employees of the Bank was 3 401 (31 December 2020: 3 574). The average number of employees of the Bank during the period ended 30 June 2021 was 3 444 (31 December 2020: 3 616).

The Bank does not have any pension arrangements separate from the pension system established by law, which requires mandatory contributions of a certain percentage of gross salaries to the State owned social insurance and privately owned pension funds. These contributions are recognised in the period when salaries are earned by employees. No further liabilities are arising to the Bank from the payment of pensions to employees in the future.

31. Other administrative expenses

€ '000	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Third parties' services	(9 082)	(4 581)	(9 382)	(4 765)
Information technologies systems maintenance	(6 815)	(3 367)	(6 992)	(3 565)
Maintenance and repairs	(2 706)	(1 261)	(2 949)	(1 510)
Advertising and sponsorship	(2 487)	(1 102)	(2 927)	(1 563)
Postage costs	(1 896)	(810)	(2 262)	(1 107)
Rental of buildings and related expenses	(1 836)	(947)	(1 800)	(1 323)
Telephone and telecommunication costs	(1 589)	(795)	(1 399)	(715)
Energy costs	(1 190)	(605)	(1 386)	(643)
Forms and office supplies	(1 112)	(460)	(1 331)	(685)
Electronic data processing system leasing	(976)	(476)	(916)	(379)
Cleaning of premises	(785)	(370)	(905)	(562)
Transport	(703)	(359)	(701)	(306)
Security	(660)	(342)	(692)	(360)
Insurance	(541)	(285)	(447)	(214)
Archives and documents	(487)	(255)	(573)	(306)
Cost of legal services	(451)	(267)	(368)	(187)
Indirect personnel costs and compensation	(438)	(257)	(495)	(178)
Other rentals	(416)	(210)	(464)	(213)
Consultations and other fees*	(334)	(165)	(324)	(126)
Information and research	(106)	(34)	(85)	(49)
Other expenses	(935)	(401)	(2 092)	(1 197)
Value added tax and other taxes	(149)	(130)	(26)	(20)
Reinvoicing	1 234	742	1 225	723
	(34 460)	(16 737)	(37 291)	(19 250)

32. Provisions

€ '000	Note	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Net release and use of provisions for litigations	19	(9)	(7)	112	116
		(9)	(7)	112	116

33. Impairment losses and Net loss arising from the derecognition of financial assets at amortised cost

€ '000	Note	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Net creation of impairment losses	21	(16 219)	(10 182)	(30 292)	(21 592)
Net (creation)/release of provisions for financial guarantees and commitments	21	(29)	1 727	(407)	532
		(16 248)	(8 455)	(30 699)	(21 060)
Net (loss) arising from the derecognition of financial assets at AC		(1 551)	(1 016)	(1 682)	373

34. Income tax expense

€ '000	Note	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Current income tax	17	(10 236)	(3 086)	(2 006)	(303)
Deferred income tax	17	(6 712)	(5 813)	(4 720)	(2 271)
		(16 948)	(8 899)	(6 726)	(2 574)

35. Other comprehensive income

€ '000	June 2021 6 months	June 2021 3 months	June 2020 6 months	June 2020 3 months
Items that shall not be reclassified to statement of profit or loss in the future				
Change in value of financial assets at FVOCI (equity instruments):				
Revaluation gains/(losses) arising during the period	502	639	(173)	1 852
Reclassification adjustment for profit on sale of FVOCI equities within equity	110	110	614	254
	612	749	441	2 106
Reversal of deferred income tax on disposed property and equipment	-	-	99	-
	612	749	540	2 106
Items that may be reclassified to statement of profit or loss in the future				
Change in value of cash flow hedges:				
Revaluation gains/(losses) arising during the period	-	-	-	-
Change in value of financial assets at FVOCI (debt instruments):				
Gains/(losses) arising during the period	6 956	361	(3 771)	19 565
Reclassification adjustment for profit on sale of FVOCI bonds included in the profit or loss	(13 723)	(27)	(270)	(224)
	(6 767)	334	(4 041)	19 341
Exchange difference on translation foreign operation	(22)	8	(360)	28
	(6 789)	342	(4 401)	19 369
Total other comprehensive income	(6 177)	1 091	(3 861)	21 475
Income tax relating to components of other comprehensive income (note 36)	1 270	(167)	627	(4 557)
Other comprehensive income for the three months after tax	(4 907)	924	(3 234)	16 918

36. Income tax effects relating to other comprehensive income

€ '000	June 2021 Before tax amount	June 2021 Tax (expense)/ benefit	June 2021 Net of tax amount	June 2020 Before tax amount	June 2020 Tax (expense)/ benefit	June 2020 Net of tax amount
Items that shall not be reclassified to statement of profit or loss in the future						
Change in value of financial assets at FVOCI (equity instruments)	612	(152)	460	441	(222)	219
Reversal of deferred income tax on disposed property and equipment	-	-	-	99	-	99
	612	(152)	460	540	(222)	318
Items that may be reclassified to statement of profit or loss in the future						
Change in value of financial assets at FVOCI (debt instruments)	(6 767)	1 422	(5 345)	(4 041)	849	(3 192)
Exchange differences on translation foreign operations	(22)	-	(22)	(360)	-	(360)
	(6 789)	1 422	(5 367)	(4 401)	849	(3 552)
	(6 177)	1 270	(4 907)	(3 861)	627	(3 234)

37. Related parties

Related parties are those counterparties that represent:

(a) Enterprises that directly, or indirectly, through one or more intermediaries, control, or are controlled by, have a significant influence or are under the common control of the reporting enterprise;

(b) Associates – enterprises in which the Parent Company has significant influence and which are neither a subsidiary nor a joint venture;

(c) Individuals owning, directly or indirectly, an interest in the voting power of the Bank that gives them significant influence over the Bank, and anyone expected to influence, or be influenced by, that person in their dealings with the Bank;

(d) Key management personnel, that is, those persons having authority and responsibility for planning, directing and controlling the activities of the Bank, including directors and officers of the Bank and close members of the families of such individuals; and

(e) Enterprises in which a substantial interest in the voting power is owned, directly or indirectly, by any person described in (c) or (d) or over which such a person is able to exercise significant influence. This includes enterprises owned by directors or major shareholders of the Bank and enterprises that have a member of key management in common with the Bank.

In considering each possible related party relationship, attention is directed to the substance of the relationship, and not merely the legal form. The stated transactions have been made under arms-length commercial and banking conditions.

On 20 July 2020 was completed the merger by incorporation of Banca IMI S.p.A., the part of the ISP Group, into the Parent Company Intesa Sanpaolo S.p.A. From this day all legal relations concerning the merged company will be intended as referred to Intesa Sanpaolo S.p.A.

37. Related parties (continued)

As at 30 June 2021, the outstanding balances with related parties comprised:

€ '000	Key management personnel ('KMP')	Subsidiaries	Joint ventures	Associates	Intesa Sanpaolo	ISP Group companies	Total
Assets							
Cash and cash equivalents	-	-	-	-	16 572	374	16 946
Financial assets at FVTPL:							
Financial assets held for trading	-	-	-	-	54 923	1	54 924
Non-trading financial assets at FVTPL	-	-	-	-	894	-	894
Derivatives - Hedge accounting	-	-	-	-	55 890	-	55 890
Financial assets at FVOCI	-	-	-	-	44	-	44
Financial assets at AC:							
Due from other banks	-	-	-	-	48 038	-	48 038
Due from customers	327	99 904	4	-	-	14 986	115 221
Property and equipment	-	1 289	-	-	-	-	1 289
Other assets	-	378	-	-	2	1 134	1 514
	327	101 571	4	-	176 363	16 495	294 760
Liabilities							
Financial liabilities at FVTPL:							
Financial liabilities held for trading	-	-	-	-	64 356	-	64 356
Derivatives - Hedge accounting	-	-	-	-	21 186	-	21 186
Financial liabilities at AC:							
Due to banks	-	-	-	-	103 211	6 468	109 679
Due to customers	1 100	1 706	-	214	-	1 745	4 765
Lease liabilities	-	-	-	-	-	-	-
Subordinated debt	-	-	-	-	-	200 134	200 134
Provisions	-	8	-	-	18	-	26
Other liabilities	894	140	-	-	-	-	1 034
	1 994	1 854	-	214	188 771	208 347	401 180

37. Related parties (continued)

As at 31 December 2020, the outstanding balances with related parties comprised:

€ '000	Key management personnel ('KMP')	Subsidiaries	Joint ventures	Associates	Intesa Sanpaolo	ISP Group companies	Total
Assets							
Cash and cash equivalents	-	-	-	-	11 941	315	12 256
Financial assets at FVTPL:							
Financial assets held for trading	-	-	-	-	58 969	15	58 984
Non-trading financial assets at FVTPL	-	-	-	-	711	-	711
Derivatives - Hedge accounting	-	-	-	-	85 124	-	85 124
Financial assets at FVOCI	-	-	-	-	326	-	326
Financial assets at AC:							
Due from other banks	-	-	-	-	57 257	-	57 257
Due from customers	329	65 467	1	-	-	-	65 797
Property and equipment	-	3 933	-	-	-	-	3 933
Other assets	-	-	-	-	-	1 139	1 139
	329	69 400	1	-	214 328	1 469	285 527
Liabilities							
Financial liabilities at FVTPL:							
Financial liabilities held for trading	-	-	-	-	73 861	-	73 861
Derivatives - Hedge accounting	-	-	-	-	52 625	-	52 625
Financial liabilities at AC:							-
Due to banks	-	-	-	-	46 540	2 092	48 632
Due to customers	1 311	243	-	245	-	2 123	3 922
Lease liabilities	-	4 458	-	-	-	-	4 458
Subordinated debt	-	-	-	-	-	200 151	200 151
Provisions	-	32	-	-	21	-	53
Other liabilities	711	295	-	-	2 474	-	3 480
	2 022	5 028	-	245	175 521	204 366	387 182

37. Related parties (continued)

As at 30 June 2021, the outstanding off-balance sheet balances with related parties comprised:

€ '000	Key manage-ment personnel ('KMP')	Sub-sidiaries	Joint ventures	Associates	Intesa Sanpaolo	ISP Group companies	Total
Commitments and undrawn credit facilities	56	315 106	17	-	191 479	-	506 658
Issued guarantees	-	-	-	-	2 924	116	3 040
Received guarantees	-	-	-	-	8 305	-	8 305
Derivative transactions (notional amount – receivable)	-	-	-	-	10 957 067	1 527	10 958 594
Derivative transactions (notional amount – payable)	-	-	-	-	10 955 344	1 527	10 956 871

As at 31 December 2020, the outstanding off-balance sheet balances with related parties comprised:

€ '000	Key manage-ment personnel ('KMP')	Sub-sidiaries	Joint ventures	Associates	Intesa Sanpaolo	ISP Group companies	Total
Commitments and undrawn credit facilities	56	349 535	20	-	14	-	349 625
Issued guarantees	-	-	-	-	10 360	85	10 445
Received guarantees	-	-	-	-	10 157	-	10 157
Derivative transactions (notional amount – receivable)	-	-	-	-	8 739 712	5 038	8 744 750
Derivative transactions (notional amount – payable)	-	-	-	-	8 741 454	5 028	8 746 482

37. Related parties (continued)

For the six months ended 30 June 2021, the outstanding balances with related parties comprised:

€ '000	KMP	Sub-sidiaries	Joint ventures	Associates	Intesa Sanpaolo	ISP Group companies	Total
Income and expense items							
Interest and similar income	2	45	-	1	1	19	68
Interest and similar expense	(1)	(37)	-	-	(3)	(2 718)	(2 759)
Fee and commission income	-	8	-	-	48	8 328	8 384
Fee and commission expense	-	-	-	-	(280)	(4)	(284)
Dividend income	-	-	3 002	-	28	-	3 030
Net trading result	-	-	-	-	5 967	(38)	5 929
Other operating income	-	-	-	-	2	16	18
Other operating expenses	-	-	-	-	(198)	-	(198)
Other administrative expenses	-	347	-	-	(4 415)	(713)	(4 781)
Depreciation	-	(359)	-	-	-	-	(359)
Impairment losses	-	25	-	-	16	-	41
	1	29	3 002	1	1 166	4 890	9 089

37. Related parties (continued)

For the six months ended 30 June 2020, the outstanding balances with related parties comprised:

€ '000	KMP	Sub-sidiaries	Joint ventures	Associates	Intesa Sanpaolo	ISP Group companies	Total
Income and expense items							
Interest and similar income	2	160	-	-	9	4	175
Interest and similar expense	(1)	(44)	-	-	(33)	(2 874)	(2 952)
Fee and commission income	1	7	-	-	104	7 140	7 252
Fee and commission expense	-	-	-	-	(267)	(622)	(889)
Dividend income	-	-	4 001	-	-	-	4 001
Net trading result	-	-	-	-	1 542	2 050	3 592
Other operating income	-	-	-	-	-	66	66
Other operating expenses	-	-	-	-	(189)	-	(189)
Other administrative expenses	-	367	-	-	(5 811)	(202)	(5 646)
Depreciation	-	(362)	-	-	-	-	(362)
Impairment losses	-	144	-	-	(5)	2	141
	2	272	4 001	-	(4 650)	5 564	5 189

38. Profit distribution

The Bank very carefully monitors the actual situation around COVID-19 pandemic and assesses its potential impact on operations, disclosures, financial position and performance of the Bank. The Bank strives to be prudent, taking into account all available information.

On 15 December 2020, the ECB adopted recommendation which recommended that until 30 September 2021 significant credit institutions exercise extreme prudence when deciding on or paying out dividends or performing share buy-backs aimed at remunerating shareholders.

Based on this guideline, on 19 April 2021, the Bank's shareholders approved the following profit distribution for 2020:

€ '000	
Dividends to shareholders (€ nil per € 33.2 share)	-
Retained earnings	85 039
	85 039

39. Events after the end of the reporting period

From 30 June 2021, up to the date when these financial statements were authorised for issue, there were no further events identified that would require adjustments to or disclosure in these financial statements.

These financial statements were authorised for issue on 29 July 2021.

Peter Magala
Member of the Management Board

Paolo Vivona
Member of the Management Board