FREE TRANSLATION FROM THE UKRAINIAN ORIGINAL

JSC KREDOBANK

International Financial Reporting Standards Separate Financial Statements and Independent Auditor's Report

31 December 2021

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KREDOBANK JSC					
Separate Statement of Financial Position					

4	Note	31 December	31 December
In thousands of hryvnias		2021	2020
Assets			
Cash and funds in the National Bank of Ukraine	6	4 817 011	2 173 743
Due from other banks	7	2 279 441	2 058 505
Loans and advances to customers	8	16 803 942	13 282 029
Securities	9	7 814 347	6 187 229
Current income tax prepayment		35	20
Deferred Income tax asset	28	46 890	43 004
Investments in subsidiaries	5	10 000	-
Investment property	10	11 771	14 054
Intangible assets	12	223 701	176 188
Property, plant and equipment	11	935 787	1 007 493
Other financial assets	13	149 124	153 702
Other non-financial assets	14	129 535	132 163
Total assets		33 221 584	25 228 130
Liabilities			
Due to other banks	15	3 712 083	2 839 280
Customer accounts	16	24 518 258	18 319 765
Due to other financial institutions	17	101 080	115 580
Debt securities	18	486 123	384 810
Current income tax liabilities		32 650	33 784
Other financial liabilities	19	254 803	246 528
Other non-financial liabilities	20	168 294	166 801
Total liabilities		29 273 291	22 106 548
Equity			
Share capital	21	2 248 969	2 248 969
Reserve and other funds		680 551	185 180
Revaluation reserve for property, plant and equipment		103 301	108 280
Revaluation reserve for securities at fair value through other		444 455	00 744
comprehensive income		114 155	83 744
Retained earnings / (Accumulated deficit)		801 317	495 409
Total equity		3 948 293	3 121 582
Total liabilities and equity		33 221 584	25 228 130

Approved to issue and signed on behalf of the Management Board on March 29, 2022.

Vasyl Lototsky Chief Accountant

Jerzy Jacek Szugajew Chairman of the Management Board Chairman of the Management Board KredoBank 09807862

KREDOBANK JSC Separate Statement of Profit or Loss and Other Comprehensive Income

In thousands of hryvnias	Note	2021	2020
Interest income calculated using the effective interest method	23	2 520 608	2 265 830
Other interest income	23	157 953	157 862
Interest expense	23	(691 493)	(644 668)
Net interest income		1 987 068	1 779 024
Fee and commission income	24	739 441	634 972
Fee and commission expense	24	(190 752)	(161 924)
Gains less losses from trading in foreign currencies		76 239	79 892
Foreign exchange translation gains less losses		7 801	6 577
Gains less losses on derecognition of securities at fair value through		5 910	3 774
other comprehensive income		5910	3774
Gains less losses on derecognition of financial assets at amortised cost		23 949	12 976
Credit loss expense on financial assets	25	(197 114)	(361 702)
Provision for other cost		(6 172)	(1 348)
Other operating income	26	50 251	50 283
Employee payments expenses	27	(673 548)	(624 078)
Depreciation costs	11,12	(324 811)	(316 434)
Administrative and other operating expenses	27	(526 397)	(454 449)
Profit before tax		971 865	647 563
Income tax expense for the year	28	(175 565)	(116 336)
Profit for the year		796 300	531 227
Other comprehensive income	5		
Items that may be reclassified subsequently to profit or loss: Financial instruments at fair value through other comprehensive income			
 Net change in the fair value of financial instruments at fair value through other comprehensive income Net change in the fair value of financial instruments at fair value 	22	36 321	7 747
through other comprehensive income transferred to net profit and loss	22	(5 910)	(3 779)
Revaluation of property, plant and equipment	22		102
Other comprehensive income for the year		30 411	4 070
Total comprehensive income for the year		826 711	535 297
Basic and diluted profit per share attributable to shareholders on the		020711	333 231
basis of The Consolidated Financial Statements (UAH per share)	29	0,0035	0,0023

Approved to issue and signed on behalf of the Management Board on March 29, 2022.

Jerzy Jacek Szugajew Chairman of the Management Board

Vasyl Lototsky Chief Accountant

In thousands of hryvnias	Note	Share capital	Reserve and other funds	Revaluation reserve for securities at fair value through other comprehensive income	Revaluation reserve for property, plant and equipment	Retained earnings I (Accumulated deficit)	Total equity
Balance at 1 January 2020		2 248 969	131 373	79 776	111 747	14 420	2 586 285
Profit for the year Other comprehensive income	22	-	-	- 3 968	- 102	531 227	531 227 4 070
Total comprehensive income for 2020		-	-	3 968	102	531 227	535 297
Distribution of profit to the reserve and other funds Transfer of revaluation surplus		-	53 807	-	-	(53 807)	-
on property to retained earnings upon disposal of property		-	-	-	(3 569)	3 569	-
Balance at 31 December 2020	×	2 248 969	185 180	83 744	108 280	495 409	3 121 582
Profit for the year Other		-	-	-	-	796 300	796 300
comprehensive income	22	-	-	30 411	-	, <u> </u>	30 411
Total comprehensive income for 2021		-	-	30 411	-	796 300	826 711
Distribution of profit to the reserve and other funds Transfer of		-	495 371	-	-	(495 371)	-
revaluation surplus on property to retained earnings upon disposal of _property		-		-	(4 979)	4 979	-
Balance at 31 December 2021		2 248 969	680 551	114 155	103 301	801 317	3 948 293

Approved to issue and signed on behalf of the Management Board on March 29, 2022.

 Image: Struggiew Chairman of the Management Board
 Vasyl Lototsky Chief Accountant

 KredoBank 0807862
 The accompanying notes on pages 7 to 85 form an integral part of these separate financial statements

In thousands of hryvnias	Note	2021	2020
Cash flows from operating activities			
Interest received		2 916 201	2 314 307
Interest paid		(680 009)	(696 267)
Fees and commissions received		728 112	630 875
Fees and commissions paid		(190 752)	(161 924)
Income received from trading in foreign currencies		76 239	79 892
Other operating income received		43 156	45 711
Employee costs paid		(675 995)	(614 794)
Administrative and other operating expenses paid		(521 041)	(434 264)
Income tax paid		(180 600)	(129 080)
Cash flows from/(used in) operating activities before changes in operating assets and liabilities		1 515 311	1 034 456
Net (increase)/decrease in due from other banks		15 093	(24 563)
Net (increase)/decrease in loans and advances to customers		(4 093 806)	(1 248 182)
Net (increase)/decrease in other financial and non-financial assets		25 778	(104 657)
Net increase/(decrease) in due to other banks		904 889	964 470
Net increase/(decrease) in customer accounts		6 698 853	3 178 776
Net increase/(decrease) in other financial and non-financial liabilities		(14 584)	28 772
Net cash from/(used in) operating activities		5 051 534	3 829 072
Cash flows from investing activities			
Acquisition of securities		(7 226 147)	(6 341 418)
Proceeds from disposal and redemption of securities		5 464 797	3 705 843
Acquisition of subsidiaries		(10 000)	_
Acquisition of property, plant and equipment	11	(70 576)	(123 311)
Proceeds from disposal of property and equipment	11	16 142	14 735
Acquisition of intangible assets	12	(149 587)	(119 369)
Net cash from/(used in) investing activities	1	(1 975 371)	(2 863 520)
Cash flows from financing activities			
Repayment of due to other financial institutions	17	-	(54 889)
Proceeds from the own debt securities placement	18	119 748	2 503
Redemption of issued own debt securities	18	(16 372)	(2 445)
Payment of lease liabilities		(77 674)	(73 098)
Net cash from/(used in) financing activities		25 702	(127 929)
Effect of exchange rate changes on cash and cash equivalents		(221 183)	440 551
Net increase/(decrease) in cash and cash equivalents		2 880 682	1 278 174
Cash and cash equivalents at the beginning of the year	6	4 201 484	2 923 310

* The Separate Statement of Cash Flows was prepared using the direct method

Approved to issue and signed on behalf of the Management Board on March 29, 2022.

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Vasyl Lototsky Chief Accountant

KREDOBANK JSC Notes to the Separate Financial Statements – 31 December 2021

1 Introduction

These financial statements were prepared in accordance with the International Financial Reporting Standards for fiscal year 2021 for Joint Stock Company "Kredobank" (hereinafter - the "Bank") in addition to the Consolidated Financial Statements of the Bank in accordance with IFRS, for submission to the National Bank of Ukraine (NBU) in compliance with the requirements of paragraph 8.1 of Section III of the instructions on the procedure for preparing and publishing the financial statements of banks of Ukraine, approved by NBU Board Resolution No. 373 on November 10, 2011, with amendments and additions. These separate financial statements should be reviewed together with the consolidated financial statements, which can be obtained on the Bank's official website (www.kredobank.com.ua).

The Bank was incorporated and is domiciled in Ukraine. The Bank is a joint-stock company limited by shares and was set up in accordance with Ukrainian laws. The Bank was founded in 1990 as a joint stock company. Initially registered by the USSR State Bank the Bank was re-registered by the National Bank of Ukraine (the "NBU") on 14 October 1991 under the name of West-Ukrainian Commercial Bank. In 2002, the Bank was renamed as Kredyt Bank (Ukraina). In November 2005, the shareholders of the Bank made the decision to change the name to Kredobank. Under the decision of Extraordinary General Shareholders Meeting on 26 November 2009, the Bank changed its name to Public Joint Stock Company "Kredobank" in order to bring its activities into compliance with the requirements of the Law of Ukraine On Joint-Stock Companies.

As at 31 December 2021 and 31 December 2020, the Bank's immediate parent company was PKO Bank Polski S.A. (Poland). The Bank is a member of the PKO Bank Polski Group ("PKO BP Group"). The largest shareholder of the PKO BP Group is the Ministry of State Assets of Poland, that controls PKO Bank Polski S.A. as owns 29.43% in the share capital of PKO Bank Polski S.A. Share of other shareholders of PKO BP S.A. does not exceed 10% of voting shares. The Bank does not have transactions with the Ministry of State Assets of Poland. As at 31 December 2021 and 31 December 2020, PKO BP S.A. owns 100% of shares of the Bank.

Principal activity. The Bank's principal business activity includes commercial banking operations, corporate and retail banking operations within Ukraine.

The Bank operates under License #43 issued by the NBU on 11 October 2011 that provide the Bank with the right to conduct banking operations, including currency operations. The Bank also possesses licenses for custodial services issued on 10 October 2013 and licenses for securities operations issued on 7 November 2012. The Bank participates in the State deposit insurance scheme (registration #051 dated 19 October 2012), which operates according to the Law of Ukraine "On Deposit Guarantee Fund" dated 23 February 2012 (as amended). The Deposit Guarantee Fund guarantees repayment of individual deposits up to UAH 200 thousand per individual in case bank liquidation procedure is started.

As at 31 December 2021, the Bank has 82 outlets (in 2020 - 82 outlets) in Ukraine.

In 2021, the average number of full-time employees of the Bank was 1,739 employees (in 2020-1,846 employees).

KREDOBANK JSC operates in accordance with the strategy for 2021-2023 approved by the Bank's Supervisory Board. The main strategic goals of KREDOBANK JSC are to achieve a high level of return on capital, which will provide the potential to increase the scale of activities; increase the total number of customers to 1 million in all segments; increase the level of customer satisfaction and their activity; increase the share in servicing foreign trade turnover between Ukraine and Poland; rapid response of IT to business needs and improving the reliability of key IT systems; maintaining a moderate risk appetite, increasing operational efficiency; increasing employee engagement and satisfaction.

The mission of the Bank is to be a reliable financial partner for clients and an attractive employer for employees. Due to the specialization and concentration of resources, the Bank seeks to achieve and maintain long-term business stability, thereby ensuring the return on investment of its shareholders.

1 Introduction (continued)

Registered address and place of business.

The Bank's registered address and place of business is: 78 Saharova Str. 79026 Lviv Ukraine

Presentation currency. These separate financial statements are presented in thousands of hryvnias ("UAH"), unless otherwise stated.

2 Operating environment of the Bank

In 2021, the economy and banking sector in Ukraine continued to be significantly affected by socio-political and foreign policy events that began in previous years, in particular:

- part of the territory of Ukraine (within the Autonomous Republic of Crimea) remained temporarily occupied by the Russian Federation as a result of annexation not recognized by the international community (UN General Assembly Resolution No. 68/262 of March 27, 2014, UN General Assembly Resolution No. 71/205 of December 19, 2016 on the human rights situation in the temporarily occupied Crimea);
- armed confrontation and military operations with separatist groups supported from abroad continued in part
 of the territory of Ukraine (within certain areas of the Donetsk and Luhansk regions). The Ukrainian
 authorities continued the anti-terrorist operation with the involvement of the army and law enforcement
 agencies. Since the end of 2015, the activity of military operations in the region has significantly decreased
 due to the Minsk agreements. As of the date of approval of the reports, certain areas of the Donetsk and
 Luhansk regions remain under the control of separatist groups, and the Ukrainian authorities are not yet
 able to ensure the implementation of Ukrainian laws in this territory.

These circumstances make it impossible for Ukrainian banks and companies to operate normally in the Autonomous Republic of Crimea and parts of the Donetsk and Luhansk regions.

Responding to the threat of coronavirus to health, Ukrainian government agencies continued to take measures to contain the epidemic in Ukraine, including in terms of restricting the work of some shopping establishments, hotel and restaurant business, entertainment venues, restrictions on cross-border travel, etc. The government decided to repeatedly extend the quarantine, the last time it was extended until March 31, 2022.

Restrictive measures imposed due to the COVID-19 pandemic by most countries of the world and the Government of Ukraine have had and continue to have a negative impact on economic activity. The spread of coronavirus has already led to a recession in the global economy and a significant slowdown in economic activity in Ukraine. At the end of 2020, the country's GDP declined by -4.2% YoY, while in the first quarter of 2021, GDP continued to decline (-2.2% year-on-year). In the second quarter of 2021, GDP growth was 5.7% YoY, in the third quarter, the growth rate slowed to 2.7% yoy, but recovered in the fourth quarter to 5.9% YoY (according to preliminary estimates). Among the positive factors contributing to the recovery of the Ukrainian economy are a high grain harvest, stable consumer demand and a slight revival of investment activity against the background of a favorable external price environment for Ukrainian export goods.

Inflation in 2021 significantly accelerated from 5.0% YoY in December 2020 to 10.0% YoY in December 2021 due to a number of factors, both internal and external. After a period of easing monetary policy during 2019-2020, the National Bank of Ukraine was forced to switch to a tighter monetary policy in 2021 in order to return inflation to the established medium-term goals. To this end, in March 2021, the NBU raised the discount rate by 0.5 percentage points to 6.5%, in April – by 1.0 percentage points to 7.5% per annum, in July – by 0.5 percentage points. up to 8.0% per annum, in September – by 0.5 percentage points to 8.5% per annum and in December – by 0.5 percentage points to 9.0% per annum.

2 Operating environment of the Bank (continued)

According to the latest macroeconomic forecast of the National Bank of Ukraine, the economy in 2022 will continue to grow with GDP growth rates of 3.4%, while inflation will slow down to 7.7% yoy. At the same time, the introduction of new restrictive measures in the context of the complication of the epidemiological situation in Ukraine may have a negative impact on the activities of the banking sector of Ukraine and JSC "KREDOBANK", its financial result. The degree of impact of the situation on Ukrainian banks will depend on overcoming the pandemic on a global and national scale, the timing and pace of vaccination, the likelihood of re-introducing restrictive measures, external financing risks, measures taken by Ukrainian authorities and the policy of the National Bank of Ukraine.

At the end of the fourth quarter of 2021, another significant risk to the economy and financial sector of Ukraine, associated with the accumulation of Russian troops near the borders of Ukraine and the threat of escalation of the military conflict, which can significantly worsen the investment attractiveness of Ukraine and the expectations of all economic agents, significantly increased.

Although the management staff believes that they are taking appropriate measures to maintain the stability of the Bank's activities, which are necessary in the current circumstances, the risk of military aggression and the risk of a "new wave" of the spread of the pandemic in Ukraine and the world and the resulting crisis phenomena in the business environment can cause a negative impact on the results of the Bank's activities and financial condition, the nature and consequences of which cannot be determined at the moment. These separate financial statements reflect the current assessment of management personnel regarding the impact of operating conditions in Ukraine on the Bank's operating activities and financial condition. Future operating conditions may differ from management personnel assessments.

3 Significant accounting policies

Basis of preparation

These separate financial statements have been prepared in accordance with International Financial Reporting Standards ("IFRS") and requirements of the National Bank of Ukraine on financial reporting by Ukrainian banks under the historical cost convention, as modified by the initial recognition of financial instruments based on fair value, and by the revaluation of buildings, and by the securities at fair value through other comprehensive income. The principal accounting policies applied in the preparation of these separate financial statements are set out below. These policies have been consistently applied to all the periods presented, unless otherwise stated.

Going concern

Management prepared these separate financial statements on a going concern basis. In making this judgement management considered the Bank's financial position, current intentions, continuing financial support from the parent company, budgeted profitability of future operations and access to financial resources and analysed the impact of the current financial and economic situation on future operations of the Bank.

Financial instruments – key measurement terms

Depending on their classification, financial instruments are carried at fair value or amortised cost as described below.

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. The best evidence of fair value is price in an active market. An active market is one in which transactions for the asset or liability take place with sufficient frequency and volume to provide pricing information on an ongoing basis. Fair value of financial instruments traded in an active market is measured as the product of the quoted price for the individual asset or liability and the quantity held by the Bank. This is the case even if a market's normal daily trading volume is not sufficient to absorb the quantity held by the Bank and placing orders to sell the position in a single transaction might affect the quoted price.

The quoted market price used to value financial assets is the current bid price; the quoted market price for financial liabilities is the current asking price.

Valuation techniques such as discounted cash flow models or models based on recent arm's length transactions or consideration of financial data of the investees, are used to measure fair value of certain financial instruments for which external market pricing information is not available. Fair value measurements are analysed by level in the fair value hierarchy as follows: (i) level one are measurements at quoted prices (unadjusted) in active markets for identical assets or liabilities, (ii) level two measurements are valuations techniques with all material inputs observable for the asset or liability, either directly (that is, as prices) or indirectly (that is, derived from prices), and (iii) level three measurements are valuations not based on solely observable market data (that is, the measurement requires significant unobservable inputs). Transfers between levels of the fair value hierarchy are deemed to have occurred at the end of the reporting period (Note 34).

Amortised cost ("AC") is the amount at which the financial instrument was recognised at initial recognition less any principal repayments, plus accrued interest, and for financial assets less any allowance for expected credit losses. Accrued interest includes amortisation of transaction costs deferred at initial recognition and of any premium or discount to maturity amount using the effective interest method. Accrued interest income and accrued interest expense, including both accrued coupon and amortised discount or premium (including fees deferred at origination, if any), are not presented separately and are included in the carrying values of related items in the statement of financial position.

The effective interest method is a method of allocating interest income or interest expense over the relevant period, so as to achieve a constant periodic rate of interest (effective interest rate) on the carrying amount. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts (excluding future credit losses) through the expected life of the financial instrument or a shorter period, if appropriate, to the gross carrying amount of the financial instrument.

The effective interest rate discounts cash flows of variable interest instruments to the next interest repricing date, except for the premium or discount, which reflects the credit spread over the floating rate specified in the instrument, or other variables that are not reset to market rates. Such premiums or discounts are amortised over the expected life of the instrument. The present value calculation includes all fees paid or received between parties to the contract that are an integral part of the effective interest rate. For assets that are purchased or originated credit impaired ("POCI") at initial recognition, the effective interest rate is adjusted for credit risk, i.e. it is calculated based on the expected cash flows on initial recognition instead of contractual payments.

Financial instruments – initial recognition

Financial instruments at fair value through profit or loss are initially recognised at fair value. Transactions costs that are attributable to the acquisition or issue of such financial assets are reflected as expenses at the date they are incurred.

All other financial instruments are initially recognised at fair value plus/minus transaction costs. Transaction costs and other payments that are directly attributable to the recognition of financial instruments are reflected as discount (premium).

The best indication of the fair value of a financial instrument at initial recognition is the transaction pricecompensation paid or received for the corresponding financial instrument.

The transaction costs include fees paid to agents, consultants, brokers and dealers, regulatory bodies, stock exchanges, taxes etc.

The transaction costs and fee and commission income which are an integral part of the financial instrument yield are included in initial value of the financial instrument and are included in the effective interest rate.

All transactions in the acquisition or sale of financial assets that provide for delivery during the period specified by law or market traditions ("ordinary" sale) are recognised at the date of settlement. All other acquisition transactions are recognised when the Bank becomes a party to the contractual provisions of the instrument.

Classification and subsequent measurement of financial instruments: principal classification categories. The Bank classifies financial assets in the following categories:

- financial assets at amortised cost (AC);
- financial assets at fair value through other comprehensive income (FVOCI);
- financial assets at fair value through profit or loss (FVTPL).

The Bank classifies financial assets that reflects the business model in which assets are managed and their cash flow characteristics.

A financial asset is measured at amortised cost if it meets both of the following conditions and is not designated as at fair value through other comprehensive income:

- it is held within a business model whose objective is to hold assets to collect contractual cash flows; and
- its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

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

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

For debt financial assets at fair value through other comprehensive income, gains and losses are recognized in other comprehensive income, except for those items recognized in profit or loss in the same way as for financial assets measured at amortized cost:

- interest income calculated using the effective interest method;
- expected credit losses (ECL) and reversal of impairment losses; and
- foreign exchange gains and losses.

All financial assets not classified as measured at amortised cost or FVOCI as described above are 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.

Capital instruments are classified in a fair value accounting model with revaluation through profit/loss. Capital instruments that are not intended for sale may be classified as valuation at fair value with the recognition of revaluation in other comprehensive income without subsequent reclassification. At the time derecognition of such instruments, the revaluation accumulated in the capital is not reclassified as profit/loss, but is transferred to another item of capital. All other equity instruments are accounted for at fair value, reflecting revaluation through profit / loss.

All financial liabilities are measured at amortised cost, except for:

- financial liabilities at fair value through profit or loss;
- financial liabilities that arise when the transfer of a financial asset does not comply with the terms of a withdrawal or when the principle of continued participation is applied;
- financial guarantee contracts, pledges, avals;
- loan commitments at a lower rate than the market;
- conditional indemnity recognized by the Bank as a purchaser in the business combination to which IFRS 3 «Business Combinations» applies. Such conditional consideration is subsequently measured at fair value through profit or loss.

Financial assets – classification and subsequent measurement: business model.

The Bank makes an assessment of the objective of the business model in which a financial 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 that is considered includes:

- the stated policies and objectives for the portfolio and the operation of those policies in practice, including 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 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 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 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's stated objective for managing the financial assets is achieved and how cash flows are realised.

The main types of business models, within which financial assets are held are the following:

- business model for holding financial assets to collect their contractual cash flows (held to collect);
- business model for holding financial assets to collect their contractual cash flows as well as to sell them (held to collect and for sale);
- other business models including: trading, managing assets on the fair value basis and maximising cash flows through sale.

In the case of a business model "held to collect" sales are not a blocking factor for classification to this model. Information about sales activity is not considered by the Bank in isolation, but as part of a holistic assessment of how the Bank stated objective for managing the financial assets is achieved and how the cash flows are realised. Therefore, the Bank consider the frequency, volume and timing of sales in prior periods, the reasons for these sales. The following sales may be consistent with the "held to collect" business model::

- deterioration of credit quality to a level that is not acceptable to the Bank under the risk management policy;
- getting out of crisis.

Also, the classification for the model "held to collect" is not contrary to sales made at the time of maturity of the asset under the terms of the contract, insignificant by volume or frequency sales.

The significance of sales is determined by comparing the volume of the sold portfolio to the total size of the portfolio attributed to this model at the beginning of the reporting period, and by comparing the result of assets sale to the revenue generated by such a portfolio. For the analysis of the volume of sales, aggregation is carried out for a period equal to the average maturity of the portfolio.

If sales volumes will substantially exceed those expected by the Bank at the time of evaluating business models, this will not lead to changes in business models for existing assets, but will have an impact on the definition of a business model, for new assets generated by the Bank.

For a business model, the goal of which is achieved by model for holding financial assets to collect their contractual cash flows as well as to sell them, sales volumes are not a significant criterion - even a significant volume and amount of them is allowed, however the purpose of sale is considered by the Bank. Financial assets that are held for trading and those that are 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.

Financial assets – classification and subsequent measurement – cash flow characteristics.

Cash flows are tested for their compliance with the basic terms of lending, namely, the test evaluates whether the contract for a financial asset provides for receiving cash flows on certain dates, which are exclusively payments of the principal amount and interest on the outstanding part of the principal amount.

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, 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 a profit margin.

In assessing whether the contractual cash flows are solely payments of principal and interest, 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. When conducting the assessment, the Bank analyses:

- 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 asset arrangements; and
- features that modify consideration for the time value of money e.g. periodic reset of interest rates..

A prepayment feature is consistent with the SPPI criterion if the prepayment amount substantially represents unpaid amounts of principal and interest on the principal amount outstanding, which may include reasonable compensation for early termination of the contract.

In addition, a prepayment feature is treated as consistent with this criterion if a financial asset is acquired or originated at a premium or discount to its contractual par amount, the prepayment amount substantially represents the contractual par amount plus accrued (but unpaid) contractual interest (which may also include reasonable compensation for early termination), and the fair value of the prepayment feature is insignificant on initial recognition.

Reclassification of financial assets. Reclassification of financial assets is carried out prospectively only in case of changing the business model within which they are held from the beginning of the first reporting period after the change. If the business model changes, then all financial assets affected by such a change are subject to reclassification from the first day of the next reporting period (year). All new assets that will be recognised from the date of change in the business model should be immediately classified according to the new business model in force at the time of initial recognition of such assets.

Reclassification of financial liabilities. The classification of financial liabilities is not subject to change after initial recognition.

Measurement of expected credit losses (ECLs). ECLs are a probability-weighted estimate of credit losses and are measured as follows:

- financial assets that are not credit-impaired at the reporting date: the present value of all cash shortfalls

 i.e. the difference between the cash flows due to the entity in accordance with the contract and the cash flows that the Bank expects to receive);
- *financial assets that are credit-impaired at the reporting date:* the difference between the gross carrying amount and the present value of estimated future cash flows;
- undrawn loan commitments: the present value of the difference between the contractual cash flows that are due to the Bank if the commitment is drawn down and the cash flows that the Bank expects to receive;
- *financial guarantee contracts:* the present value of the expected payments to reimburse the holder less any amounts that the Bank expects to recover.

The Bank measures expected credit losses and recognizes loss allowances at each reporting date.

The Bank measures loss allowances at an amount equal to lifetime ECL or 12-month ECL. Lifetime ECLs are the ECLs that result from all possible default events over the expected life of the financial instrument. 12-month ECL are the portion of ECL that result from default events on a financial instrument that are possible within the 12 months after the reporting date.

Measurement of ECLs reflects: (i) an unbiased and probability-weighted sum determined by estimating the range of possible outcomes, (ii) the time value of money and (iii) all reasonable information about past events, current conditions and forecasted future economic conditions, available at the reporting date without undue cost and efforts.

Financial instruments that are not subject to a significant increase in credit risk compared to the date of initial recognition are classified to the first stage of impairment by the Bank.

Financial instruments that show signs of a significant increase in credit risk compared to the date of initial recognition and are not in default are classified to the second stage of impairment.

Financial assets in the state of default are classified by the Bank to the third stage of impairment. Financial assets that are credit-impaired on initial recognition are classified as purchased or originated financial assets. The Bank does not recognize loss allowances at the date of initial recognition of purchased or originated credit-impaired financial assets – gross carrying value is its fair value. Initially, expected credit losses are included in credit-adjusted effective interest rate. Any changes in expected credit losses are recognized in profit or loss even if such changes exceed the amount of the previously formed loss allowances for such a financial asset.

Loss allowances are always recognized for purchased or originated credit-impaired financial assets on a lifetime basis.

Financial assets that are credit-impaired are defined as financial assets for which there is objective evidence of a loss or there are one or more events that have a negative impact on the expected future cash flows of such a financial asset:

- 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.

Definition of default. The Bank considers a financial asset to be in default 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 collateral (if any is held);
- the borrower is more than 90 days past due on any material credit obligation to the Bank (for balances with other banks default is recognized if a financial asset is 30 days past due). Overdrafts are considered past due once the customer has breached an advised limit or been advised of a limit that is smaller than the current amount outstanding;
- the restructuring of the loan associated with financial difficulties of the borrower;
- initiation of litigation, liquidation or bankruptcy proceedings of the borrower.

In assessing whether a borrower is in default, the Bank considers indicators that are:

- qualitative: e.g. breaches of covenants;
- quantitative: e.g. overdue status and non-payment of another obligation of the same issuer to the Bank; and
- based on data obtained from external sources;
- start of liquidation or bankruptcy procedure for the borrower.

Inputs into the assessment of whether a financial instrument is in default and their significance may vary over time to reflect changes in circumstances.

The rate of recovery. The Bank sets a certain period necessary to restore the quality of financial assets. The terms of the quality recovery period are deemed to be fulfilled if, during a 6-months period from the date the Bank introduces measures to restore the ability of the counterparty to fulfil its obligations, there are no signs of impairment, compliance with obligations to the Bank is ensured.

Significant increase in credit risk. When determining whether the credit risk (i.e. risk of default) on a financial instrument has increased significantly since initial recognition, the Bank considers reasonable and supportable information that is relevant and available without undue cost or effort, including both quantitative and qualitative information and analysis based on the Bank's historical experience, expert credit assessment and forward-looking information.

When contractual terms of a loan have been modified, evidence that the criteria for recognising lifetime ECL are no longer met includes history of up-to-date payment performance against the modified contractual terms. The Bank primarily identify whether a significant increase in credit risk has occurred for an exposure by analyzing indicators that are:

- the borrower is more than 30 days past due but less than 90 days past due on any material credit obligation to the Bank. Overdrafts are considered past due once the customer has breached an advised limit or been advised of a limit that is smaller than the current amount outstanding;
- breaches of covenant, the identification of threatening features that are likely to affect the quality of debt service;
- based on data developed internally and obtained from external sources;
- the period of credit quality restoration has ended and there are no prerequisites for attributing them to impaired ones after restructuring (forbearance);
- the value of the LtV (loans to collateral ratio) exceeds 200% (for individual mortgages);
- • for banks a significant increase in credit risk occurs if the borrowers' rating has declined by 3 notches.

The Bank monitors the effectiveness of the criteria used to identify significant increases in credit risk by regular reviews to confirm that:

- the criteria are capable of identifying significant increases in credit risk before an exposure is in default;
- the criteria do not align with the point in time when an asset becomes 30 days past due;
- the average time between the identification of a significant increase in credit risk and default appears reasonable;
- exposures are not generally transferred directly from 12-month ECL measurement to credit-impaired.

Inputs into measurement of ECLs. The key inputs into the measurement of ECLs are likely to be the term structures of the following variables:

- probability of default (PD);
- loss given default (LGD); and
- exposure at default (EAD).

These parameters are derived from internally developed statistical models and other historical data used in models for calculating regulatory capital. They are adjusted to reflect forward-looking information. PD estimates are estimates at a certain date, which are calculated based on statistical models and assessed using tools tailored to the various categories of counterparties and exposures. PD estimates are based on migration matrices, which are based on the type of credit product and payment periods.

LGD is the magnitude of the likely loss if there is a default. The Bank estimates LGD parameters based on the history of recovery rates of claims against defaulted counterparties after the default date.

EAD represents the expected exposure in the event of a default. The Bank derives the EAD from the current exposure to the counterparty and potential changes to the current amount allowed under the contract, including amortisation, and prepayments. The EAD of a financial asset is the gross carrying amount at default.

For lending commitments and financial guarantees, the EAD considers the amount drawn, as well as potential future amounts that may be drawn or repaid under the contract, which are estimated based on historical observations and forward-looking forecasts.

As described above, and subject to using a maximum of a 12-month PD for financial assets for which credit risk has not significantly increased, the Bank measures ECLs considering the risk of default over the maximum contractual period (including any borrower's extension options) over which it is exposed to credit risk, even if, for risk management purposes, the Bank considers a longer period.

For overdrafts and credit card facilities that include both a loan and an undrawn commitment component, the Bank measures ECLs over a period longer than the maximum contractual period if the Bank's contractual ability to demand repayment and cancel the undrawn commitment does not limit the Bank's exposure to credit losses to the contractual notice period.

These facilities do not have a fixed term or repayment structure and are managed on a collective basis. The Bank can cancel them with immediate effect but this contractual right is not enforced in the normal day-to-day management, but only when the Bank becomes aware of an increase in credit risk at the facility level. This longer period is estimated taking into account the credit risk management actions that the Bank expects to take and that serve to mitigate ECLs. These include a reduction in limits and cancellation of the facility.

Where modelling of a parameter is carried out on a collective basis, the financial instruments will be grouped on the basis of shared risk characteristics that include:

- instrument type;
- client type;
- period of debt overdue;
- geographic location of the borrower;
- loan currency.

ECL for exposures in Stage 1 is calculated by multiplying the 12-month PD by LGD and EAD. Lifetime ECL is calculated by multiplying the lifetime PD by LGD and EAD. The groupings are subject to regular review to ensure that exposures within a particular group remain appropriately homogeneous.

Forward-looking information. The Bank incorporates forward-looking information into its measurement of ECLs. This assessment is based on external information. External information may include economic data and forecasts published by governmental bodies, and selected private sector and academic forecasters, such as of Ministry of Economic Development and Trade of Ukraine, State Statistics Service of Ukraine, National Bank of Ukraine.

The Bank also periodically carries out stress-testing of more extreme shocks to calibrate its determination of these other representative scenarios.

The Bank has identified and documented key drivers of credit risk and credit losses for each portfolio of financial instruments and, using an analysis of historical data, has estimated relationships between macro-economic variable and credit risk and credit losses. This key driver is forecasts of real GDP change, forecasts of unemployment and dynamics of the calculated wages, including per 1 employee.

Presentation of allowance for ECL in the separate statement of financial position

Loss allowances for ECL are presented in the separate statement of financial position as follows:

- *financial assets* measured at amortised cost: as a deduction from the gross carrying amount of the assets;
- *loan commitments and financial guarantee contracts:* generally, as a provision as part of Other financial liabilities;
- where a financial instrument includes both a drawn and an undrawn component, and the Bank cannot identify the ECL on the loan commitment component separately from those on the drawn component: the Bank presents a combined loss allowance for both components. The combined amount is presented as a deduction from the gross carrying amount of the drawn component. Any excess of the loss allowance over the gross amount of the drawn component is presented as a provision; and
- debt instruments measured at FVOCI: no loss allowance is recognised in the separate statement of
 financial position because the carrying amount of these assets is their fair value. However, the loss
 allowance is disclosed and is recognised in the fair value reserve.

Collateral. When calculating the amount of expected credit losses for the credit-impaired assets, the Bank accepts the value of a collateral that meets the established eligibility criteria established by the Bank and determined by the regulator as a means of credit quality improving.

Write-off of financial assets. If the Bank does not have reasonable expectations for full or part of the recovery of a financial asset, the gross carrying amount of that financial asset is reduced. Such a reduction is considered as a (partial) derecognition of a financial asset. The Bank may write-off financial assets that are still subject to enforcement activity when the Bank seeks to recover amounts that are contractually due, however, there is no reasonable expectation of recovery.

Financial assets – derecognition. The Bank derecognises financial assets when:

- the contractual rights to the cash flows from the financial asset expire;
- it transfers the financial asset and the transfer qualifies for derecognition;
- financial assets are written-off.

The Bank transfers a financial assets only if:

- · transfers the contractual rights to receive the cash flows of the financial asset, or
- retains the contractual rights to receive the cash flows of the financial asset, but assumes a contractual obligation to pay the cash flows to one or more recipients in an arrangement that meets all of the following conditions:
 - the Bank has no obligation to pay amounts to the eventual recipients unless it collects equivalent amounts from the original asset;
 - the Bank is prohibited by the terms of the transfer contract from selling or pledging the original asset to the eventual recipients for the obligation to pay them cash flows;
 - the Bank has an obligation to remit any cash flows it collects on behalf of the eventual recipients without material delay. Interest earned on such investments is passed to the eventual recipients.

When the Bank transfers a financial asset, it evaluates the extent to which it retains the risks and rewards of ownership of the financial asset. In this case:

- if the Bank transfers substantially all the risks and rewards of ownership of the financial asset, the Bank derecognises the financial asset and recognises separately as assets or liabilities any rights and obligations created or retained in the transfer;
- if the Bank retains substantially all the risks and rewards of ownership of the financial asset, the Bank continues to recognise the financial asset;
- if the Bank neither transfers nor retains substantially all the risks and rewards of ownership of the financial asset, the Bank determines whether it has retained control of the financial asset.

The control of the transferred asset is not available if the party to whom the asset is transferred has the real ability to sell it to an unrelated third party and may sell this sale unilaterally without the need to impose additional restrictions on such transfer.

If the control over a financial asset is not retained, the recognition of such an asset is terminated, otherwise, if the control over the financial asset is retained, its recognition continues to be recognized within the further continuing involvement.

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 other comprehensive income is recognised in profit or loss.

Any cumulative gain/loss recognised in other comprehensive income in respect of equity securities designated as at FVOCI is not reclassified in profit or loss on derecognition of such securities. 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.

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.

Financial liabilities – derecognition. Financial liabilities are derecognised when they are extinguished (i.e. when the obligation specified in the contract is discharged, cancelled or expires).

An exchange between an existing borrower and lender of debt instruments with substantially different terms is accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability. Similarly, a substantial modification of the terms of an existing financial liability or a part of it is accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability.

Significantly different are the conditions under which the net present value of the cash flows under the new terms discounted using the original effective interest rate (for a floating interest rate interest rate, the effective interest rate that was calculated at the last change in the nominal interest rate) differs by at least 10% of the discounted present value of cash flows remaining before the maturity date of the original financial liability.

Any expense or remuneration is the income/expense from derecognition if the changes in the terms of a financial liability are reflected in the accounting as a repayment of the original financial liability and the recognition of a new financial liability. The difference between the carrying amount of a financial liability (or part of a financial liability) extinguished or transferred to another party and the consideration paid is recognised in profit or loss.

If the exchange or amendment of debt obligations (modification) does not result in the cessation of recognition, any costs and remunerations from the exchange / modification adjust the carrying amount of the financial liability and are amortized over the term of the new liability (effective interest rate is not recalculated, but adjusted to reflect these costs/remunerations).

Modification of financial assets. Modified financial asset – an asset by which the contractual cash flows provided have been reviewed by agreement or modified.

If the terms of a financial asset are modified, the Bank evaluates whether the cash flows of the modified asset are substantially different. If the cash flows are substantially different (referred to as 'substantial modification'), 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 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; and
- other fees are included in profit or loss as part of the gain or loss on derecognition.

The Bank performs a quantitative and qualitative evaluation of whether the modification is substantial, that is whether the cash flows under initial financial asset differ significantly from cash flows from modified financial asset or the asset that has replaced initial financial asset. To determine the type of modification and its consequences, a quantitative and qualitative analysis of changes in terms of the contract, and the combined effects of qualitative and quantitative factors, is conducted. If the cash flows are significantly different, the rights to the contractual cash flows for the original financial asset are considered to have expired. In making this assessment, the Bank is guided by the derecognition of financial liabilities by analogy.

The Bank concludes that the modification of the conditions is significant, based on such qualitative factors:

- change the currency of the financial asset;
- change of the borrower, except for changes due to the death of the borrower;
- change of terms of financial asset that lead to non-compliance with the SPPI criterion (for example, adding a conversion condition).

If the modification of the terms of the loan agreement was so significant that it leads to the recognition of a new asset and at the same time the asset fulfills the conditions of classification to default - the new asset is classified as initially impaired.

Changes in the value of cash flows from existing financial assets or financial liabilities are not considered to be modifications if they are provided by the original terms of the contract.

As a part of credit risk management the Bank reviews the terms of loans to customers with financial difficulties ("the practice of reviewing the terms of credit agreements") in order to maximize the return on the original contractual terms rather than to originate a new asset. 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). As a result, the amount of the contracted cash flows remaining at the time of the modification is recognized as an initial financial asset is likely to be equivalent to the value of newly modified cash flows under the contract. The Bank performs qualitative evaluation of whether the modification is substantial.

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 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.

For loans in which the borrower has an option to prepay the loan at par without significant penalty, the Bank treats the modification of an interest rate to a current market rate using the guidance on floating-rate financial instruments. This means that the effective interest rate is adjusted prospectively.

Modification of financial liabilities. The Bank derecognises a financial liability when its terms are modified and the cash flows of the modified liability are substantially different. In this case, a new financial liability based on the modified terms is recognised at fair value. The difference between the carrying amount of the financial liability extinguished and the new financial liability with modified terms is recognised in profit or loss. Compensation paid includes non-financial assets transferred, if any, and the assumption of liabilities, including the new modified financial liability.

The Bank performs a quantitative evaluation of whether the modification is substantial. For the quantitative assessment the terms are substantially different if the discounted present value of the cash flows under the new terms, including any fees paid net of any fees received and discounted using the original effective interest rate, is at least 10 per cent different from the discounted present value of the remaining cash flows of the original financial liability.

If the modification of a financial liability is not accounted for as derecognition, then the amortised cost of the liability is recalculated by discounting the modified cash flows at the original effective interest rate and the resulting gain or loss is recognised in profit or loss. For floating-rate financial liabilities, 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 and fees incurred are recognised as an adjustment to the carrying amount of the liability and amortised over the remaining term of the modified financial liability by re-computing the effective interest rate on the instrument to take into account the influence of such commissions.

Cash and cash equivalents. Cash and cash equivalents are items which are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value. Cash and cash equivalents include unrestricted balances with the NBU, deposit certificates and all interbank placements with original maturities of less than three months. Funds restricted are excluded from cash and cash equivalents. Cash and cash equivalents are carried at amortised cost.

Due from other banks. Due from other banks are accounted for when the Bank advances money to counterparty banks with no intention of trading the resulting unquoted non-derivative receivable due on fixed or determinable dates. These accounts receivable are not related to derivatives and do not have market quotes. Amounts due from banks are carried at amortised cost.

Securities. The 'securities' caption in the separate statement of financial position includes:

- debt securities measured at amortised cost; these are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortised cost using the effective interest method;
- debt securities measured at FVOCI; and
- equity securities designated as at FVOCI.

Loans and advances to customers. 'Loans and advances to customers' caption in the separate statement of financial position includes:

- loans to customers measured at amortised cost; they are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortised cost using the effective interest method;
- finance lease receivables.

KREDOBANK JSC Notes to the Separate Financial Statements – 31 December 2021

3 Significant accounting policies (continued)

Repossessed collateral. Repossessed collateral represents financial and non-financial assets acquired by the Bank in settlement of overdue loans. The assets are initially recognized at fair value when acquired (but not higher than carrying value of the settled overdue loans) and included in property, plant and equipment, other financial assets or inventories within other assets depending on their nature and the Bank's intention in respect of recovery of these assets and are subsequently accounted for in accordance with the accounting policies for these categories of assets.

Financial guarantees and loan commitments. The Bank has credit related commitments including loan commitments, letters of credit and financial guarantees. Financial guarantees – are non-cancellable guarantee to make payments in the case when a client fails to fulfil its obligations to third parties. Financial guarantees has the same risk as loans.

Financial guarantees are contracts that require the Bank to make specified payments to reimburse the holder for a loss that it incurs because a specified debtor fails to make payment when it is due in accordance with the terms of a debt instrument. Loan commitments are firm commitments to provide credit under pre-specified terms and conditions.

Financial guarantees issued or commitments to provide a loan at a below-market interest rate are initially measured at fair value. Subsequently, they are measured at the higher of the loss allowance determined in accordance with IFRS 9 and the amount initially recognised less, when appropriate, the cumulative amount of income recognised in accordance with the principles of IFRS 15.

The Bank has issued no loan commitments that are measured at FVTPL.

For other loan commitments, the Bank recognises a loss allowance.

Liabilities arising from financial guarantees and loan commitments are included within provisions.

Investment property. Investment property is property held by the Bank to earn rental income or for capital appreciation, or both. Investment property includes assets under construction for future use as investment property.

The same property can be divided into structurally separated parts used for different purposes: one part – to receive rental income or equity increase; the other part – for using in the Bank's activity or for administrative purposes.

Investment property is initially recognised at cost of acquisition, including transaction costs, and subsequently remeasured at fair value to reflect market conditions at the end of the reporting period.

Fair value of investment property is the price that would be received from sale of the asset in an orderly transaction, without deduction of any transaction costs. The fair value of the Bank's investment property is determined based on reports of the internal appraiser who holds relevant professional qualification and has recent experience in valuation of property of similar location and category. The basis used for the valuation was market value.

Earned rental income is recorded in profit or loss for the year within other operating income. Gains and losses resulting from changes in the fair value of investment property are recorded in profit or loss for the year and presented separately.

Property, plant and equipment. Property, plant and equipment are stated at cost or revalued amounts, as described below, less accumulated depreciation and provision for impairment, where required.

Since 2012, land and buildings are accounted for under the revaluation model. At the date of revaluation accumulated depreciation of buildings was eliminated against the gross carrying amount of the asset and the net amount was recalculated to the revalued amount of the asset.

Buildings held by the Bank are subject to revaluation with sufficient regularity to ensure that the carrying amount does not differ materially from that which would be determined using fair value at the end of the reporting period. Increases in the carrying amount arising on revaluation are credited to other comprehensive income and increase the revaluation surplus in equity, except to the extent that it reverses a revaluation decrease of the same asset previously recognised in the separate statement of profit or loss and other comprehensive income, in which case the increase is recognised in the separate statement of profit or loss and other comprehensive income, income. Decreases that offset previous increases of the same asset are recognised in other comprehensive income and decrease the previously recognised revaluation surplus in equity; all other decreases are charged to profit or loss for the year. The revaluation reserve for buildings included in equity is transferred directly to retained earnings when the revaluation surplus is realised on the retirement or disposal of the asset and through annual amortisation of the revaluation reserve.

Costs of minor repairs and maintenance are expensed when incurred. Costs of replacing major parts or components of property, plant and equipment items are capitalised and the replaced part is retired.

At the end of each reporting period management assesses whether there is any indication of impairment of property, plant and equipment. If any such indication exists, management estimates the recoverable amount, which is determined as the higher of an asset's fair value less costs to sell and its value in use. The carrying amount is reduced to the recoverable amount and the impairment loss is recognised in profit or loss for the year. An impairment loss recognised for an asset in prior years is reversed if there has been a change in the estimates used to determine the asset's value in use or fair value less costs to sell.

Gains or losses on disposals determined by comparing proceeds with carrying amount are recognised in profit or loss for the year (within other operating income or expenses). **Depreciation.** Land and construction in progress are not depreciated. Depreciation of property, plant and equipment and right-of-use assets is calculated using the straight-line method to allocate their cost to their residual values over their estimated useful lives: <u>Useful lives, years</u>

Buildings	70
Furniture and fixtures	5-15
Motor vehicles	7
Computers and equipment	5-15
Leasehold improvements	over the term of the underlying lease

Intangible assets. The Bank's intangible assets have the definite useful life and primarily include capitalised computer software. Acquired computer software licences are capitalised on the basis of the costs incurred to acquire and bring them to use. Development costs that are directly associated with identifiable and unique software controlled by the Bank are recorded as intangible assets if an inflow of incremental economic benefits exceeding costs is probable. Capitalised costs include staff costs of the software development team and an appropriate portion of relevant overheads. All other costs associated with computer software, e.g. its maintenance, are expensed when incurred. Capitalised computer software is amortised on a straight line basis over expected useful lives of no more than 10 years.

Lease in which the Bank acts as a lessee

When concluding a contract, the Bank determines whether the contract or a separate part of it is a lease agreement. A contract or a separate part of it is a lease agreement if it transfers the right to control the use of a certain asset for a certain period of time in exchange for compensation. The Bank reevaluates whether the contract or a separate part of it is a lease agreement only if the terms of the contract are revised. If the contract or a separate part of it is a lease agreement, the Bank considers each lease component as a lease agreement, separately from the non-lease components of the contract.

The Bank defines the lease term as a non-canceled lease period, taking into account:

- periods covered by the lease extension option if the lessee is reasonably confident that he will take advantage of such an opportunity; and
- periods covered by the option for early termination of the lease, if the lessee is reasonably sure that he will not take advantage of such an opportunity.

The Bank reviews the lease term in the event of a change in the lease period that has not been canceled. The lease term starts from the start date of the lease, i.e. the date when the lessor makes the underlying asset available for use by the lessee.

Initial recognition. As of the start date of the lease, the Bank recognises the asset as a right of use and an obligation under the lease agreement. The right-of-use asset is valued at cost.

As of the start date of the lease, the Bank estimates the liabilities under the lease agreement in the amount of the present value of lease payments not yet paid on that date. Lease payments are discounted by applying the interest rate stipulated in the lease agreement. If such a rate cannot be easily determined, the Bank applies the discount rate of the National Bank of Ukraine.

Lease payments taken into account when assessing lease obligations for the right of use the underlying asset during the lease term include:

- fixed payments less any incentives to enter into a lease agreement to be received;
- variable lease payments based on an index or rate that was originally estimated using such an index or rate at the start date of the lease;
- amounts to be paid by the Bank under liquidation value guarantees;
- the exercise price of an asset purchase option, if the Bank is reasonably confident that it will take advantage of such an opportunity;
- penalties for termination of the lease, if the terms of the lease reflect the Bank's exercise of the option to terminate the lease early.

The Bank uses simplification and does not recognize assets under the right of use on the balance sheet in relation to:

- short-term lease agreements;
- lease agreements under which the underlying asset has a low value.

When applying this simplification, short-term lease agreements with a lease term of up to 365 days inclusive are considered. Leases that provide an option to acquire an underlying asset are not considered short-term. The Bank applies the threshold of UAH 150,000 when determining the underlying asset with a low value. Under leases to which the Bank applies exemptions, costs are recognized in the period to which they relate.

Subsequent measurement. After the start date of the lease, the Bank evaluates all assets under right of use, except those that meet the definition of investment property, at cost less accumulated depreciation, accumulated impairment, adjusted for the amount of revaluation of lease liabilities reflected against the cost of the asset under right of use.

Depreciation of a right-of-use asset is carried out from the start date of the lease until the end of the useful life of the underlying asset, if the lease transfers ownership of the underlying (leased) asset to the Bank at the end of the lease term, or if the cost of the right-of-use asset reflects the fact that the Bank will take advantage of the opportunity to purchase it. In other cases, the Bank amortises the right-of-use asset from the start date of the lease to an earlier of the following two dates: the end of the useful life of the right-of-use asset and the end of the lease term. Other requirements for depreciation and recognition of impairment of an asset by right-of-use are similar to those applied to own property, plant and equipment.

Revaluation of lease liabilities

The Bank changes the valuation of lease liabilities by discounting the revised lease payments using the revised discount rate if any of the conditions are met:

- change in the lease term (due to a revision of the probability of executing an option to extend or terminate the lease ahead of schedule);
- change in the assessment of the possibility of acquiring the underlying asset;
- change in payments due to changes in the floating interest rate.

The Bank changes the valuation of lease liabilities by discounting revised lease payments using an unchanged discount rate if any of the conditions are met:

- change in the amounts expected to be paid under the liquidation value guarantee;
- changes in future lease payments as a result of changes in the index or rate used to determine such payments. The Bank reflects the amount of revaluation of the lease liability as an adjustment of the right-of-use asset (except in the case of a decrease in the carrying amount of the right-of-use asset to zero). If the carrying amount of the right-of-use asset has decreased to zero and the lease liability is further reduced, the Bank recognises the remaining amount as part of the profit or loss.

Modifications to the lease agreement

The Bank considers the modification of the lease agreement as a separate lease agreement, if the conditions are met:

- the modification expands the scope of the lease agreement by adding the right to use one or more underlying assets;
- contract compensation is increased by an amount corresponding to the price of an individual contract for an increased volume, with appropriate adjustments reflecting the circumstances of a particular contract.

For a modification of a lease agreement that is not considered as a separate lease agreement, as of the effective date of the modification, the Bank:

- distributes compensation specified in the modified lease agreement;
- determines the terms of the modified lease;
- revalues the lease liability by discounting the revised lease payments using the revised discount rate.

The revised discount rate is defined as the interest rate provided for in the lease agreement for the remaining lease term or as the additional borrowing rate of the lessee on the effective date of the lease modification, if the interest rate provided for in the lease cannot be easily determined.

For a modification of a lease agreement that is not considered as a separate lease agreement, as of the effective date of the modification, the Bank:

- reduces the carrying amount of the right-of-use asset by the amount of partial or complete termination
 of the lease for modification, which reduces the scope of the lease agreement; any profit or loss
 associated with partial or complete termination of the lease is recorded under "other administrative
 and operating costs" of the Income statement;
- reflects adjustments to the right-of-use asset for all other modifications to the lease agreement.

Leases in which the Bank acts as a lessor

The Bank, as a lessor, classifies each lease as a finance or operating lease. This classification is made as of the date of the lease agreement or the date of commitment by the parties to the agreed basic terms of the lease agreement, and is revised only if the lease agreement is modified. A lease is classified as a finance lease if it transfers substantially all the risks and rewards incidental to ownership of the underlying asset. Otherwise, the lease is classified as operating. The classification of a lease as financial or operating depends on the substance of the transaction and not on the form of the contract.

The Bank leases its investment properties, including commercial real estate owned by it, as well as leased real estate. The Bank classified these leases as operating leases because it does not transfer virtually all of the risks and benefits of owning assets.

Some property leases contain extension options exercisable by the Bank. Where practicable, the Bank seeks to include extension options in new leases to provide operational flexibility. The extension options held are exercisable only by the Bank and not by the lessors. The Bank assesses at lease commencement date whether it is reasonably certain to exercise the extension options. The Bank reassesses whether it is reasonably certain to exercise the options if there is a significant event or significant changes in circumstances within its control.

The Bank doesn't expect any penalties as the leases will either be extended or lease liabilities will be fulfilled in accordance with the terms of the contract.

Accounts receivable under finance leases are included in loans and advances to customers.

Due to other banks, customer accounts, due to other financial institutions and debt securities. Due to other banks, customer accounts, due to other financial institutions and debt securities are initially measured at fair value minus incremental direct transaction costs, and subsequently measured at their amortised cost using the effective interest method.

Income taxes. In these separate financial statements income taxes have been provided for in accordance with Ukrainian legislation enacted or substantively enacted by the end of the reporting period. The income tax charge/(credit) comprises current tax and deferred tax and is recognised in profit or loss for the year except if it is recognised in other comprehensive income or directly in equity because it relates to transactions that are also recognised, in the same or a different period, in other comprehensive income or directly in equity.

Current tax is the amount expected to be paid to or recovered from the taxation authorities in respect of taxable profits or losses for the current and prior periods. Taxes other than on income are recorded within administrative and other operating expenses..

Deferred income tax is provided using the balance sheet liability method for tax loss carry forwards and temporary differences arising between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes. In accordance with the initial recognition exemption, deferred taxes are not recorded for temporary differences on initial recognition of an asset or a liability in a transaction other than a business combination if the transaction, when initially recorded, affects neither accounting nor taxable profit. Deferred tax balances are measured at tax rates enacted or substantively enacted at the end of the reporting period date which are expected to apply to the period when the temporary differences will reverse. Deferred tax assets for deductible temporary differences and tax loss carry forwards are recorded only to the extent that it is probable that future taxable profit will be available against which the deductions can be utilised.

Deferred income tax is not recognized for retained earnings after acquisition or other changes in the reserves of subsidiaries whose dividend policy is controlled by the Bank if it is quite probable that the difference will not be repaid through dividends or otherwise in the future.

Uncertain tax positions. The Bank's uncertain tax positions are reassessed by management at the end of each reporting period. Liabilities are recorded for income tax positions that are determined by management as more likely than not to result in additional taxes being levied if the positions were to be challenged by the tax authorities. The assessment is based on the interpretation of tax laws that have been enacted or substantively enacted by the end of each reporting period and any known court or other rulings on such issues. Liabilities for penalties, interest and taxes other than on income are recognised based on management's best estimate of the expenditure required to settle the obligations at the end of the reporting period.

Accounts payable for operating activities and other accounts payable. Accounts payable for operating activities are recognised when the counterparty has fulfilled its obligations under the agreement and are carried at amortised cost.

Share capital. Ordinary shares are classified as equity. Incremental costs directly attributable to the issue of new shares are shown in equity as a deduction, net of tax, from the proceeds. Any excess of the fair value of consideration received over the par value of shares issued is recorded as share premium in equity.

Interest income and expense. The Bank recognises interest income and expense in profit or loss using the effective interest method during the period from the date of initial recognition to the date of derecognition or reclassification of financial instruments. The 'effective interest rate' is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument to the gross carrying amount of the financial asset; or the amortised cost of the financial liability.

When calculating the effective interest rate for financial instruments other than purchased or originated creditimpaired assets, the Bank estimates future cash flows considering all contractual terms of the financial instrument, but not expected credit losses. For purchased or originated credit-impaired financial assets, a creditadjusted effective interest rate is calculated using estimated future cash flows including expected credit losses.

Credit-adjusted effective interest rate – is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial asset to the amortised value of the financial asset which is purchased or originated credit-impaired asset. When calculating the credit-adjusted effective interest rate, the Bank estimates all contractual terms of the financial asset and expected credit losses.

The calculation of the effective interest rate includes transaction costs and fees and points paid or received that are an integral part of the effective interest rate. Transaction costs include incremental costs that are directly attributable to the acquisition or issue of a financial asset or financial liability.

Interest income is calculated by applying the effective interest rate applied to the gross carrying amount of the financial asset at amortised cost except:

- purchased or originated credit-impaired assets. For such assets interest income is calculated by applying the credit-adjusted effective interest rate to the amortised cost of the asset from the date of initial recognition; the calculation of interest income does not revert to a gross basis, even if the credit risk of the asset improves;
- financial assets which are not purchased or originated credit-impaired assets, but subsequently have become credit-impaired. In this case, the Bank applies effective interest rate to the amortised cost of the asset in the subsequent reporting periods after the date of their recognition as credit-impaired. If the asset is no longer credit-impaired, then the calculation of interest income reverts to the gross basis.

The effective interest rate is revised as a result of periodic reestimation of cash flows of floating rate instruments to reflect movements in market rates of interest.

Interest income calculated using the effective interest method presented in the separate statement of profit or loss and other comprehensive income includes:

- interest income calculated using the effective interest method on financial assets measured at amortised cost;
- interest calculated using the effective interest method on debt instruments measured at FVOCI.

Other interest income presented in the separate statement of profit and loss and other comprehensive income includes interest income on non-derivative debt financial instruments measured at FVTPL and net investments in finance leases.

Interest expense presented in the separate statement of profit or loss and other comprehensive income includes financial liabilities measured at amortised cost.

Fee and commission income and expense. 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. Commission income on credit related commitments at market rates are integral part of effective interest rate, if it is probable that the Bank will enter into a specific loan agreement and will not plan to realize the loan within a short period of time after it is provided. If there is no high probability that it will be issued to the borrower within the framework of the loan commitment, then the commission fees for the loan are recognized evenly over the duration of the loan commitment.

A contract with a customer that results in a recognised financial instrument in the Bank's financial statements may be partially in the scope of IFRS 9 and partially in the scope of IFRS 15. If this is the case, then the Bank first applies IFRS 9 to separate and measure the part of the contract that is in the scope of IFRS 9 and then applies IFRS 15 to the residual.

All other payments, commission and other income and expenses are generally accounted for using the accrual method depending on the degree of completeness of the particular transaction, which is defined as the proportion of the actual service provided in the total amount of services to be provided. Other commission income, including commission fee for servicing accounts, remuneration for investment management services, other commission fees, are recognized as the services are provided.

Commissions due to negotiation or participation in third-party transaction negotiations (for example, purchase of loans, shares or other securities, or acquisition or sale of companies) that the Bank earns upon completion of the transaction are recognised after the completion of the transaction.

Foreign currency translation. The functional currency of the Bank and its subsidiary is the currency of the economic environment in which the Bank and its subsidiary operate. The functional and presentation currency is the national currency of Ukraine, hryvnias.

Monetary assets and liabilities are translated into the functional currency at the official exchange rate of the NBU at the end of the respective reporting period. Foreign exchange gains and losses resulting from the settlement of transactions and from the translation of monetary assets and liabilities into functional currency at year-end official exchange rates of the NBU are recognised in profit or loss. Translation at year-end rates does not apply to non-monetary items, including equity investments. Effects of exchange rate changes on the fair value of equity securities are recorded as part of the fair value gain or loss.

The principal rates of exchange used for translating foreign currency balances were as follows:

	31 December 2021, UAH	31 December 2020, UAH
1 US Dollar (USD)	27,2782	28,2746
1 Euro (EUR)	30,9226	34,7396
1 zloty (PLN)	6,7277	7,6348
1 Russian Ruble (RUB)	0,3640	0,3782

Offsetting. Financial assets and liabilities are offset and the net amount reported in the separate statement of financial position only when there is a legally enforceable right to offset the recognised amounts, and there is an intention to either settle on a net basis, or to realise the asset and settle the liability simultaneously. Such a right of set off 1) must not be contingent on a future event and 2) must be legally enforceable in all of the following circumstances: (a) in the normal course of business, (b) the event of default and (c) the event of insolvency or bankruptcy.

Staff costs. Wages, salaries, contributions to the Ukrainian state pension and social insurance funds, paid annual leave and sick leave, bonuses, and non-monetary benefits are accrued in the year in which the associated services are rendered by the employees of the Bank. The Bank has no legal or constructive obligation to make pension or similar benefit payments beyond the payments to the statutory defined contribution scheme.

Segment reporting. Operating segments are reported in a manner consistent with the internal reporting provided to management being the Bank's chief operating decision maker. Segments whose revenue, result or assets are ten percent or more of all the segments are reported separately. Geographical segments of the Bank have been reported separately in these separate financial statements based on the ultimate domicile of the counterparty. The ultimate domicile and the actual place of business of the counterparties generally coincide.

Presentation of separate statement of financial position in order of liquidity. The Bank does not have a clearly identifiable operating cycle and therefore does not present current and noncurrent assets and liabilities separately in the separate statement of financial position. Instead, assets and liabilities are presented in order of their liquidity. The following table provides information for each line item in the separate statement of financial position which combines contractual amounts to be recovered or settled.

	31	December 20	21	31	December 202	20
	Amount recovered or cont	r settled per		Amounts to be recovered or settled per contract		_
In thousands of hryvnias	Within 12 months after the reporting period	After 12 months after the reporting period	Total	Within 12 months after the reporting period	After 12 months after the reporting period	Total
Assets						
Cash and funds in the National Bank of Ukraine	4 817 011	-	4 817 011	2 173 743	-	2 173 743
Due from other banks	2 279 441	-	2 279 441	2 058 505	-	2 058 505
Loans and advances to customers	7 501 744	9 302 198	16 803 942	5 731 848	7 550 181	13 282 029
Securities	4 401 835	3 412 512	7 814 347	3 783 968	2 403 261	6 187 229
Current income tax prepayment	35	-	35	20	-	20
Deferred Income tax asset Investments in subsidiaries	-	46 890 10 000	46 890 10 000	-	43 004	43 004
Investment property	-	11 771	11 771	-	14 054	14 054
Property, plant and equipment	-	935 787	935 787	-	1 007 493	1 007 493
Intangible assets	-	223 701	223 701	-	176 188	176 188
Other financial assets	149 124	-	149 124	153 702	-	153 702
Other non-financial assets	129 535	-	129 535	132 163	-	132 163
Total assets	19 278 725	13 942 859	33 221 584	14 033 949	11 194 181	25 228 130
Liabilities						
Due to other banks	712 083	3 000 000	3 712 083	539 280	2 300 000	2 839 280
Customer accounts	24 051 406	466 852	24 518 258	17 913 504	406 261	18 319 765
Due to other financial institutions	1 313	99 767	101 080	115 580	-	115 580
Debt securities	486 123	-	486 123	384 810	-	384 810
Current income tax liabilities	32 650	-	32 650	33 784	-	33 784
Other financial liabilities	139 686	115 117	254 803	139 268	107 260	246 528
Other non-financial liabilities	168 294	-	168 294	166 801	-	166 801
Total liabilities	25 591 555	3 681 736	29 273 291	19 293 027	2 813 521	22 106 548

New or Amended Standards and Interpretations.

The Bank first applied certain standards and amendments which are effective for annual accounting periods beginning on or after 1 January 2021. The Bank has not adopted in advance standards, interpretations or amendments that have been issued but is not yet effective..

Interest Rate Benchmark Reform – Phase 2: Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16

The amendments provide temporary reliefs which address the financial reporting effects when an interbank offered rate (IBOR) is replaced with an alternative nearly risk-free interest rate (RFR). The amendments include the following practical expedients:

- a practical expedient to require contractual changes, or changes to cash flows that are directly required by the reform, to be treated as changes to a floating interest rate, equivalent to a movement in a market rate of interest;
- permit changes required by IBOR reform to be made to hedge designations and hedge documentation without the hedging relationship being discontinued;
- provide temporary relief to entities from having to meet the separately identifiable requirement when an RFR instrument is designated as a hedge of a risk component.

These amendments had no impact on the consolidated financial statements of the Bank. The Bank intends to use the practical expedients in future periods if they become applicable..

Amendments to IFRS 16 - « Covid-19-Related Rent Concessions beyond 30 June 2021»

On 28 May 2020, the IASB issued Covid-19-Related Rent Concessions - amendment to IFRS 16 Leases The amendments provide relief to lessees from applying IFRS 16 guidance on lease modification accounting for rent concessions arising as a direct consequence of the Covid-19 pandemic. As a practical expedient, a lessee may elect not to assess whether a Covid-19 related rent concession from a lessor is a lease modification. A lessee that makes this election accounts for any change in lease payments resulting from the Covid-19 related rent concession the same way it would account for the change under IFRS 16, if the change were not a lease modification.

The amendment was intended to apply until 30 June 2021, but as the impact of the Covid-19 pandemic is continuing, on 31 March 2021, the IASB extended the period of application of the practical expedient to 30 June 2022.

The amendment applies to annual reporting periods beginning on or after 1 April 2021.

However, the Bank has not received Covid-19-related rent concessions, but plans to apply the practical expedient if it becomes applicable within allowed period of application.

New accounting provisions

The new and amended standards and interpretations that are issued, but not yet effective, up to the date of issuance of the Bank's financial statements are disclosed below. The Bank intends to adopt these new and amended standards and interpretations, if applicable, when they become effective..

IFRS 17 "Insurance Contracts"

In May 2017, the IASB issued IFRS 17 Insurance Contracts (IFRS 17), a comprehensive new accounting standard for insurance contracts covering recognition and measurement, presentation and disclosure. Once effective, IFRS 17 will replace IFRS 4 Insurance Contracts (IFRS 4) that was issued in 2005. IFRS 17 applies to all types of insurance contracts (i.e., life, non-life, direct insurance and re-insurance), regardless of the type of entities that issue them, as well as to certain guarantees and financial instruments with discretionary participation features. A few scope exceptions will apply. The overall objective of IFRS 17 is to provide an accounting model for insurance contracts that is more useful and consistent for insurers. In contrast to the requirements in IFRS 4, which are largely based on grandfathering previous local accounting policies, IFRS 17 provides a comprehensive model for insurance contracts, covering all relevant accounting aspects. The core of IFRS 17 is the general model, supplemented by:

- a specific adaptation for contracts with direct participation features (the variable fee approach)
- a simplified approach (the premium allocation approach) mainly for short-duration contracts.

IFRS 17 is effective for reporting periods beginning on or after 1 January 2023, with comparative figures required. Early application is permitted, provided the entity also applies IFRS 9 and IFRS 15 on or before the date it first applies IFRS 17. This standard is not applicable to the Bank.

Amendments to IFRS (IAS) 1- «Classification of Liabilities as Current or Non-current»

In January 2020, the IASB issued amendments to paragraphs 69 to 76 of IAS 1 to specify the requirements for classifying liabilities as current or non-current. The amendments clarify:

- what is meant by a right to defer settlement;
- that a right to defer must exist at the end of the reporting period;
- that classification is unaffected by the likelihood that an entity will exercise its deferral right;
- that only if an embedded derivative in a convertible liability is itself an equity instrument would the terms of a liability not impact its classification.

The amendments are effective for annual reporting periods beginning on or after 1 January 2023 and must be applied retrospectively. The Bank is currently assessing the impact the amendments will have on current classification of liabilities.

Amendments to IFRS 3- «References to the Conceptual Framework»

In May 2020, the IASB issued Amendments to IFRS 3 Business Combinations - Reference to the Conceptual Framework. The amendments are intended to replace a reference to the Framework for the Preparation and Presentation of Financial Statements, issued in 1989, with a reference to the Conceptual Framework for Financial Reporting issued in March 2018 without significantly changing its requirements.

The Board also added an exception to the recognition principle of IFRS 3 to avoid the issue of potential 'day 2' gains or losses arising for liabilities and contingent liabilities that would be within the scope of IAS 37 or IFRIC 21 Levies, if incurred separately..

At the same time, the Board decided to clarify existing guidance in IFRS 3 for contingent assets that would not be affected by replacing the reference to the Framework for the Preparation and Presentation of Financial Statements.

The amendments are effective for annual reporting periods beginning on or after 1 January 2022 and apply prospectively.

Amendments to IAS 16 - «Property, Plant and Equipment: Proceeds before Intended Use»

In May 2020, the IASB issued Property, Plant and Equipment — Proceeds before Intended Use, which prohibits entities deducting from the cost of an item of property, plant and equipment, any proceeds from selling items produced while bringing that asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Instead, an entity recognises the proceeds from selling such items, and the costs of producing those items, in profit or loss.

The amendment is effective for annual reporting periods beginning on or after 1 January 2022 and must be applied retrospectively to items of property, plant and equipment made available for use on or after the beginning of the earliest period presented when the entity first applies the amendment.

The amendments are not expected to have a material impact on the Bank.

Amendments to IAS 37- «Onerous Contracts—Cost of Fulfilling a Contract»

In May 2020, the IASB issued amendments to IAS 37 to specify which costs an entity needs to include when assessing whether a contract is onerous or loss-making.

The amendments apply a "directly related cost approach". The costs that relate directly to a contract to provide goods or services include both incremental costs and an allocation of costs directly related to contract activities. General and administrative costs do not relate directly to a contract and are excluded unless they are explicitly chargeable to the counterparty under the contract.

The amendments are effective for annual reporting periods beginning on or after 1 January 2022. The Bank will apply these amendments to contracts for which it has not yet fulfilled all its obligations at the beginning of the annual reporting period in which it first applies the amendments.

Amendment to IFRS 1 « First-time Adoption of International Financial Reporting Standards» - a subsidiary that applies International Financial Reporting Standards for the first time

As part of its 2018-2020 annual improvements to IFRS standards process, the IASB issued an amendment to IFRS 1 First-time Adoption of International Financial Reporting Standards. The amendment permits a subsidiary that elects to apply paragraph D16(a) of IFRS 1 to measure cumulative translation differences using the amounts reported by the parent, based on the parent's date of transition to IFRS. This amendment is also applied to an associate or joint venture that elects to apply paragraph D16(a) of IFRS 1.

The amendment is effective for annual reporting periods beginning on or after 1 January 2022 with earlier adoption permitted.

Amendment to IFRS 9 «Financial Instruments» - fees in the '10 per cent' test for derecognition of financial liabilities

As part of its 2018-2020 annual improvements to IFRS standards process the IASB issued amendment to IFRS 9. The amendment clarifies the fees that an entity includes when assessing whether the terms of a new or modified financial liability are substantially different from the terms of the original financial liability. These fees include only those paid or received between the borrower and the lender, including fees paid or received by either the borrower or lender on the other's behalf. An entity applies the amendment to financial liabilities that are modified or exchanged on or after the beginning of the annual reporting period in which the entity first applies the amendment.

The amendment is effective for annual reporting periods beginning on or after 1 January 2022 with earlier adoption permitted. The Bank will apply the amendments to financial liabilities that are modified or exchanged on or after the beginning of the annual reporting period in which the entity first applies the amendment.

The amendments are not expected to have a material impact on the Bank.

Amendment to IAS 41 Agriculture - Taxation in Fair Value Measurement

As part of its 2018-2020 annual improvements to IFRS standards process the IASB issued amendment to IAS 41 Agriculture. The amendment removes the requirement in paragraph 22 of IAS 41 that entities exclude cash flows for taxation when measuring the fair value of assets within the scope of IAS 41.

An entity applies the amendment prospectively to fair value measurements on or after the beginning of the first annual reporting period beginning on or after 1 January 2022 with earlier adoption permitted.

The amendments are not expected to have a material impact on the Bank.

Amendment to IAS 8 - «Changes in Accounting Estimates and Errors»

In February 2021, the IAS issued amendments to IAS 8, which introduce the definition of "accounting estimates". The amendments explain the difference between changes in accounting estimates and changes in accounting policies and error correction. In addition, the document explains how organisations use measurement methods and raw data to develop accounting estimates.

The amendments apply to annual accounting periods beginning on or after January 1, 2023, and apply to changes in accounting policies and changes in accounting estimates occurring at or after the start date of the specified period. Early application is allowed, provided that this fact is disclosed.

It is expected that this amendment will not significantly affect the Bank.

Amendment to IAS 1 and Practice Statement 2 - « Disclosure of accounting policies »

In February 2021, the IASB issued amendments to IAS 1 which provides guidance and examples to help entities apply materiality judgements to accounting policy disclosures. The IASB also issued amendments to IFRS Practice Statement 2 to support the amendments in IAS 1 by explaining and demonstrating the application of the 'four-step materiality process' to accounting policy disclosures.

The amendments aim to help entities provide accounting policy disclosures that are more useful by:

- Replacing the requirement for entities to disclose their 'significant' accounting policies with a requirement to disclose their 'material' accounting policies; and
- Adding guidance on how entities apply the concept of materiality in making decisions about accounting policy disclosures.

The amendments to IAS 1 are applicable for annual periods beginning on or after 1 January 2023 with earlier application permitted as long as this fact is disclosed. Since the amendments to the IFRS Practice Statement 2 provide non-mandatory guidance on the application of the definition of material to accounting policy information, the IASB concluded that transition requirements and an effective date for these amendments were not necessary.

The Bank is currently assessing the impact the amendments will have on accounting policy disclosures.

4 Critical accounting estimates, and judgements in applying accounting policies

The Bank makes estimates and assumptions that affect the amounts recognised in the separate financial statements, and the carrying amounts of assets and liabilities within the next financial year. Estimates and judgements are continually evaluated and are based on management's experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. Management also makes certain judgements, apart from those involving estimations, in the process of applying the accounting policies. Judgements that have the most significant effect on the amounts recognised in the separate financial statements and estimates that can cause a significant adjustment to the carrying amount of assets and liabilities within the next financial year include:

- Financial assets classification: an assessment of business model in which assets are held and an assessment whether the contractual cash flows of the financial asset are solely payments of principal and interest on the principal amount outstanding Note 3 (Classification and further valuation of financial assets: business model and Classification and further valuation of financial assets: characteristics of cash flows).
- Expected credit losses (impairment) of financial instruments: an assessment whether there has been a significant increase in credit risk compared to the date of initial recognition, and including forward-looking information in the measurement of expected credit losses Note 3 (Estimation of expected credit losses).
- Measures to provide customer support. The situation with the spread of the COVID-19 coronavirus, due to quarantine restrictions and a high level of uncertainty, had an insignificant impact on the solvency of the Bank's borrowers.

The Bank does not note a significant deterioration in the quality of the loan portfolio due to quarantine measures, but at the same time understands that at the moment it is not possible to fully determine the consequences of the impact of the situation with COVID19 on the future solvency and credit activity of customers.

• **Buildings assessment.** As noted in Note 3, buildings held by the Bank are subject to revaluation with sufficient regularity. The revaluation was carried out by the internal appraiser who holds relevant professional qualification and has recent experience in valuation of property of similar location and category. The valuation was based on a comparative sales method. In making the valuation, certain judgments were used, in particular to determine such property, plant and equipment, in determining the value by the method of comparing sales prices.

The Bank's property, plant and equipment were revaluated at market value as at 31 December 2019. The valuation was based on a comparative sales method and was carried out by the internal appraiser who holds relevant professional qualification and has recent experience in valuation of property of similar location and category. For each real estate property several comparables were selected based on the following criteria: location, type, condition and size. Adjustments were applied for a price representing an offer rather than an actual transaction (bargain discount), location, size, floor and condition and other adjustments. Bargain discount applied by the internal appraiser was usually in the range from 10% to 15%. Other adjustments applied by the internal valuator were usually in the range from 10% to 15%. The evaluator used only a comparative method to evaluate all objects of property, plant and equipment.

Changes in such assumptions may affect the fair value of the assets. If the price per square meter differs by 10%, the fair value of buildings will increase / decrease by UAH 30 100 thousand (in 2020 - by UAH 30 696 thousand).

• **Definition of terms under leases.** The Bank considers all available facts and circumstances that give rise to an economic incentive to exercise the extension options. The Bank determines the total lease term based on the option to extend the lease and terminate the longer lease term. Where practicable, the Bank seeks to include renewal options in new leases to provide operational flexibility. The Bank assesses at lease commencement date whether it is reasonably certain to exercise extension options. As a result, the lease term for most lease objects is 2-7 years.

5 Investments in subsidiaries

During the reporting period, the management bodies of KREDOBANK JSC decided to develop their activities in the related financial services market in the form of a separate legal entity. In August 2021, by the decision of the Supervisory Board of KREDOBANK JSC, a subsidiary of the Bank, KREDOLEASING LLC, was established and passed state registration. The subject of activity of this company, 100% of the capital of which belongs to KREDOBANK JSC, is the provision of financial services, namely leasing, factoring, provision of funds on loan. In November 2021, KREDOLEASING LLC received licenses to provide financial services and was entered by the National Bank of Ukraine in the State Register of financial institutions. This investment in the amount of UAH 10,000 thousand is accounted for at the purchase price.

6 Cash and funds in the National Bank of Ukraine

	31 December	31 December
In thousands of hryvnias	2021	2020
Cash on hand	833 931	649 423
Cash balances on correspondent accounts with the NBU	381 220	324 022
Deposit certificates issued by the NBU	3 601 860	1 200 298
Total cash and funds in the National Bank of Ukraine	4 817 011	2 173 743

As at 31 December 2021 and 2020 the Bank was in compliance with the mandatory reserve requirements.

As at 31 December 2021, the Bank's cash and cash equivalents for the purposes of the separate statement of cash flows amounted to UAH 7 082 166 thousand (as at 31 December 2020: UAH 4 201 484 thousand).

	31 December	31 December
In thousands of hryvnias	2021	2020
Cash on hand and funds in the National Bank of Ukraine	4 817 011	2 173 743
Correspondent accounts with other banks	2 265 396	2 028 206
Loss allowances for expected credit losses	(241)	(465)
Total cash and cash equivalents	7 082 166	4 201 484

Cash and cash equivalents include cash and funds in the National Bank of Ukraine, funds on correspondent accounts with other banks, and all placements of funds on the interbank market with an initial maturity of no more than three months.

7 Due from other banks

In thousands of hryvnias	31 December 2021	31 December 2020
Correspondent accounts with other banks	2 265 396	2 028 206
Guarantee deposits	14 355	30 829
Loss allowances for expected credit losses	(310)	(530)
Total due from other banks	2 279 441	2 058 505

Guarantee deposits include assets placed mostly as guarantee deposits for card settlements and transfers, as well as a documentary transaction.

Amounts due from other banks are not collateralised. The credit quality of due from banks outstanding as at 31 December 2021 is below. This analysis is based on Moody's ratings.

KREDOBANK JSC Notes to the Separate Financial Statements – 31 December 2021

7 Due from other banks (continued)

In thousands of hryvnias	Correspondent accounts	Guarantee deposits	Total
Assets with 12-month expected credit losses - Stage 1			
- Aa1 – Aa3 rated	476 914	-	476 914
- A1 - A3 rated	1 699 082	6 185	1 705 267
- Baa1 - Baa3 rated	13 442	-	13 442
- Unrated	75 958	8 170	84 128
Loss allowances for 12-months expected credit losses	(241)	(69)	(310)
Total due from other banks	2 265 155	14 286	2 279 441

The credit quality of due from banks outstanding as at 31 December 2020 is below. This analysis is based on Moody's ratings.

In thousands of hryvnias	Correspondent accounts	Guarantee deposits	Total
Assets with 12-month expected credit losses - Stage 1			
- Aa1 – Aa3 rated	424 770	-	424 770
- A1 - A3 rated	1 510 615	23 235	1 533 850
- Baa1 - Baa3 rated	30 166	-	30 166
- Unrated	62 655	7 594	70 249
Loss allowances for 12-months expected credit losses	(465)	(65)	(530)
Total due from other banks	2 027 741	30 764	2 058 505

As at 31 December 2021, the Bank had a concentration of balances on current accounts with other credit institutions of UAH 1 870 819 thousand due from three largest banks with credit ratings of investment grade (as at 31 December 2020 - UAH 1 824 564 thousand).

During 2021 the movements in expected credit losses are as follows:

In thousands of hryvnias	Note	Correspondent accounts	Guarantee deposits	Total
Loss allowances with 12-month expected credit losses as at 1 January 2021- Stage 1		465	65	530
Remeasurement of loss allowance Effect of exchange rate of foreign currency	25	(198) (26)	4	(194) (26)
Loss allowances with 12-month expected credit losses as at 31 December 2021- Stage 1		241	69	310

During 2020 the movements in expected credit losses are as follows:

In thousands of hryvnias	Note	Correspondent accounts	Loans from banks	Guarantee deposits	Total
Loss allowances for 12-months expected credit losses as at 1 January 2020 - Stage 1		135	66	38	239
Remeasurement of loss allowance	25	284	(41)	27	270
Assets that have been derecognised	25	-	(25)	-	(25)
Effect of exchange rate of foreign currency		46	-	-	46
Loss allowances for 12-months expected credit losses as at 31 December 2020 - Stage 1		465	-	65	530

Refer to Note 34 for the estimated fair value of each class of amounts due from other banks. Interest rate analysis of due from other banks is disclosed in Note 31.

KREDOBANK JSC Notes to the Separate Financial Statements – 31 December 2021

8 Loans and advances to customers

In thousands of hryvnias	31 December 2021	31 December 2020
Corporate loans	9 111 803	7 669 499
Loans to individuals - car loans	3 617 917	2 946 302
Loans to individuals - mortgage loans	2 963 369	1 846 526
Loans to individuals - other consumer loans	1 766 079	1 666 190
Loss allowances for expected credit losses	(655 226)	(846 488)
Total loans and advances to customers	16 803 942	13 282 029

Changes in loss allowances for expected credit losses during 2021 are as follows:

In thousands of hryvnias	Note	Stage 1 12-month expected credit losses	Stage 2 Lifetime expected credit for not impaired	Stage 3 Lifetime expected credit for credit- impaired	Purchased credit- impaired	Total
Loss allowances for expected credit losses at 1 January 2021		220 043	49 288	576 404	753	846 488
New originated or purchased Net remeasurement of loss	25	155 661	197	1 755	52 133	209 746
allowance for expected credit losses*	25	(169 674)	125 036	1 210	16 254	(27 174)
Write-offs		(35)	(46)	(383 727)	(769)	(384 577)
Adjustment for interest income from credit-impaired loans		41	2	81 917	(5 126)	76 834
Effect of exchange rate of foreign currency		(2 056)	330	(14 929)	21	(16 634)
Other movements, including transfers to Stages:		3 921	(110 413)	109 595	(52 560)	(49 457)
- transfer from Stage 1		(19 126)	14 373	4 753	-	-
 transfer from Stage 2 		6 159	(134 634)	128 475	-	-
- transfer from Stage 3		999	9 835	(10 838)	4	-
Loss allowances for expected credit losses at 31 December 2021		207 901	64 394	372 225	10 706	655 226

* Remeasurement of loss allowance for expected credit losses includes the following: changes for loans issued during 2021, for which there was a change in the level of expected loan losses from the date of issue to the end of the year; changes in loans issued before 2021 that remained in the portfolio as at 31 December 2021; changes for loans derecognised during the period. The table above discloses the accumulated impact of changes in the level of expected credit losses, including if a significant increase in credit risk was recognized several times during the year, which resulted in the transfer between stages for several times with its subsequent reduction and vice versa.

As at 31 December 2021, loans issued in 2021 and outstanding as at 31 December 2021 amounted to UAH 10 556 427 thousand (63% of loans and advances to customers as at 31 December 2021), including corporate loans - UAH 5 956 931 thousand (35% of loans and advances to customers as at 31 December 2021), out of which 70% of loans have initial maturity up to 2 years and due to short term nature the days of debt overdue is the most significant criterion for significant increase of credit risk for such loans. Credit quality of corporate loans and advances increases, therefore new loan grantings exceed loan repayments of outstanding exposures. As at 31 December 2021 UAH 5 059 725 thousand of loans outstanding were fully repaid (36%), including loans in Stage 1 - UAH 4 367 450 thousand (loss allowance as at 1 January 2021 amounted to UAH 66 838 thousand).

During 2021, the Bank made an assignment of claims to customers in the amount of UAH 74 595 thousand (during 2020 - UAH 5 802 thousand), net book value amounted to UAH 56 583 thousand (2020 - UAH 3 446 thousand).

During 2020 changes in loss allowances for expected credit losses on loans and advances to customers are as follows:

In thousands of hryvnias	Note	Stage 1 12-month expected credit losses	Stage 2 Lifetime expected credit for not impaired	Stage 3 Lifetime expected credit for credit- impaired	Purchased credit- impaired	Total
Loss allowances for expected credit losses at 1 January 2020		172 704	39 802	402 170	47 847	662 523
New originated or purchased Net remeasurement of loss	25	125 431	56	523	-	126 010
allowance for expected credit losses *	25	(77 892)	179 759	68 154	6 008	176 029
Write-offs		-	(30)	(175 852)	(84 059)	(259 941)
Adjustment for interest income from credit-impaired loans		(54)	(64)	58 840	5 973	64 695
Effect of exchange rate of foreign currency		6 873	334	34 812	-	42 019
Other movements, including transfers to Stages:		(7 019)	(170 569)	187 757	24 984	35 153
- transfer from Stage 1		(28 740)	26 212	2 528	-	-
- transfer from Stage 2		10 686	(200 419)	189 733	-	-
- transfer from Stage 3		807	3 636	(4 443)	-	-
Loss allowances for expected credit losses at 31 December 2020		220 043	49 288	576 404	753	846 488

* Remeasurement of loss allowance for expected credit losses includes the following: changes for loans issued during 2020, for which there was a change in the level of expected loan losses from the date of issue to the end of the year; changes in loans issued before 2020 that remained in the portfolio as at 31 December 2020; changes for loans derecognised during the period. The table above discloses the accumulated impact of changes in the level of expected credit losses, including if a significant increase in credit risk was recognized several times during the year, which resulted in the transfer between stages for several times with its subsequent reduction and vice versa.

KREDOBANK JSC Notes to the Separate Financial Statements – 31 December 2021

8 Loans and advances to customers (continued)

As at 31 December 2020, loans issued in 2020 and outstanding as at 31 December 2020 amounted to UAH 7 238 698 thousand (51% of loans and advances to customers as at 31 December 2020), including corporate loans - UAH - 4 265 295 thousand (30% of loans and advances to customers as at 31 December 2020), out of which 70% of loans have initial maturity up to 2 years and due to short term nature the days of debt overdue is the most significant criterion for significant increase of credit risk for such loans. Credit quality of corporate loans and advances increases, therefore new loan grantings exceed loan repayments of outstanding exposures. As at 31 December 2020 UAH 4 019 015 thousand of loans outstanding were fully repaid (32%), including loans in Stage 1 - UAH 3 713 320 thousand (loss allowance as at 31 December 2020 amounted to UAH 52 286 thousand).

The amount of loans that were written off during 2021, but remain the subject of enforcement activity, is UAH 96 162 thousand (in 2020 - UAH 120 300 thousand).

	31 December 2	31 December 2020		
In thousands of hryvnias	Amount	%	Amount	%
Individuals	8 347 365	48	6 459 018	46
Agriculture and food processing	3 012 248	17	2 754 998	20
Trade	2 368 550	14	1 992 063	14
Manufacturing	1 767 355	10	1 688 213	12
Other services	905 447	5	612 341	4
Real estate and construction	610 539	4	274 403	2
Transportation	313 793	2	213 690	2
Mining	34 766	-	56 296	-
Health resorts	22 019	-	4 484	-
Hotels	3 521	-	2 644	-
Sports and recreation services	302	-	158	-
Other	73 263	-	70 209	-
Total loans and advances to customers (before expected credit losses)	17 459 168	100	14 128 517	100

Economic sector risk concentration within the customer loan portfolio is as follows:

As at 31 December 2021, the total gross carrying value of top 10 borrowers of the Bank was UAH 1 395 152 thousand (31 December 2020: UAH 1 091 719 thousand), or 8% of the loan portfolio before expected credit losses (31 December 2020: 8% of the loan portfolio before expected credit losses).

As at 31 December 2021, loans and advances to customers in the amount of UAH 361 058 thousand (31 December 2020: UAH 291 737 thousand) were secured by deposits in the amount of UAH 436 586 thousand (31 December 2020: UAH 347 200 thousand). Refer to Note 16 and Note 31.

Credit quality analysis of the loans outstanding as at 31 December 2021 is presented below:

	Note	Stage 1 12-month expected credit losses	Stage 2 Lifetime expected credit losses for not credit-	Stage 3 Lifetime expected credit for credit-	Purchased credit- impaired
In thousands of hryvnias			impaired	impaired	
Corporate loans					
 not yet past due 	8 647 180	153 196	172 054	-	8 972 430
 less than 30 days overdue 	8 325	-	80	-	8 405
 - 30 to 90 days overdue 	350	61 922	3 790	11 901	77 963
 91 to 180 days overdue 	-	-	19 244	-	19 244
- 181 to 360 days overdue	-	2	6 680	-	6 682
- over 360 days overdue	-	1	27 078	-	27 079
- Loss allowances for expected	(70.404)	(00.004)	(07.000)	(5.04.0)	(477.007)
credit losses	(72 164)	(32 291)	(67 600)	(5 912)	(177 967)
Carrying value of the				_	
corporate loans	8 583 691	182 830	161 326	5 989	8 933 836
Loans to individuals - car					
loans					
	3 366 293	5 121	36 082		3 407 496
- not yet past due	3 300 293 82 734	1 199	13 281	-	97 214
- less than 30 days overdue				-	
- 30 to 90 days overdue	2 760	23 297	17 677	-	43 734
- 91 to 180 days overdue	-	-	24 022	-	24 022
- 181 to 360 days overdue	-	-	30 969	-	30 969
- over 360 days overdue	-	-	14 482	-	14 482
 Loss allowances for expected credit losses 	(48 041)	(13 295)	(69 800)	-	(131 136)
Carrying value of the car loans to individuals	3 403 746	16 322	66 713	-	3 486 781
Loans to individuals -					
mortgage loans					
- not yet past due	2 866 786	9 152	31 499	9 798	2 917 235
- less than 30 days overdue	-	-	-	-	-
- 30 to 90 days overdue	5 409	3 602	9 673	-	18 684
- 91 to 180 days overdue	-	-	6 208	-	6 208
- 181 to 360 days overdue	-	-	3 387	-	3 387
- over 360 days overdue	-	-	17 855	-	17 855
- Loss allowances for expected					
credit losses	(30 368)	(2 589)	(36 164)	(4 642)	(73 763)
Carrying value of loans to					
individuals - mortgage loans	2 841 827	10 165	32 458	5 156	2 889 606
Loans to individuals - other					
consumer loans					
- not yet past due	1 416 105	7 087	58 560	259	1 482 011
				259	
- less than 30 days overdue	64 893	1 209	18 466	-	84 568
- 30 to 90 days overdue	2 354	29 800	14 447	-	46 601
- 91 to 180 days overdue	-	16	48 438	145	48 599
- 181 to 360 days overdue	-	19	82 721	316	83 056
- over 360 days overdue	-	6	21 228	10	21 244
 Loss allowances for expected credit losses 	(57 328)	(16 219)	(198 661)	(152)	(272 360)
Carrying value of other consumer loans to individuals	1 426 024	21 918	45 199	578	1 493 719
Total loans and advances to customers	16 255 288	231 235	305 696	11 723	16 803 942

KREDOBANK JSC Notes to the Separate Financial Statements – 31 December 2021

8 Loans and advances to customers (continued)

Credit quality analysis of the loans outstanding as at 31 December 2020 is presented below:

In thousands of braveics	Stage 1 12- month expected credit	Stage 2 Lifetime expected credit losses for not credit-impaired	Stage 3 Lifetime expected credit losses for credit- impaired	Purchased credit- impaired	Tota
In thousands of hryvnias	losses				
Corporate loans	7 000 001	10.006	06 405		7 220 67
- not yet past due	7 239 301 8 679	12 936 290	86 435 1 229		7 338 672 10 198
less than 30 days overdue30 to 90 days overdue	1 967	290 29 575	73 788	-	1019
- 91 to 180 days overdue	1 907	29 57 5	19 219	-	19 223
- 181 to 360 days overdue	-	6	100 322	-	100 32
- over 360 days overdue	-	-	95 748	-	95 74
Loss allowances for expected credit			95740	_	5574
losses	(110 850)	(11 095)	(190 199)	-	(312 144
Carrying value of the loans to legal entities	7 139 097	31 716	186 542	-	7 357 35
Loans to individuals - car loans					
 not yet past due 	2 619 981	12 106	26 020		2 658 10
 less than 30 days overdue 	73 826	3 776	7 136	-	84 73
- 30 to 90 days overdue	7 482	33 488	13 672	-	54 64
- 91 to 180 days overdue	-	-	50 375	-	50 37
- 181 to 360 days overdue	-	-	53 644	-	53 64
- over 360 days overdue	-	-	44 796	-	44 79
Loss allowances for expected credit losses	(36 152)	(13 742)	(100 618)	-	(150 512
Carrying value of the car loans to	2 665 137	35 628	95 025	-	2 795 79
individuals Loans to individuals - mortgage					
loans					
- not yet past due	1 733 034	13 396	27 283		1 773 71
- less than 30 days overdue	-	-	-	-	-
- 30 to 90 days overdue	5 898	4 683	5 239	-	15 82
- 91 to 180 days overdue	-	770	13 701	-	14 47
- 181 to 360 days overdue	-	-	17 120	-	17 12
- over 360 days overdue	-	-	25 402	-	25 40
Loss allowances for expected credit	(00 500)	(0,404)			
losses	(22 582)	(2 494)	(39 508)	-	(64 584
Carrying value of mortgage loans to individuals	1 716 350	16 355	49 237	-	1 781 94
Loans to individuals - other					
consumer loans					
 not yet past due 	1 214 735	15 078	48 410	222	1 278 44
 less than 30 days overdue 	70 903	4 461	9 831	2	85 19
- 30 to 90 days overdue	8 810	44 517	17 762	62	71 15
- 91 to 180 days overdue	-	193	39 223	44	39 46
- 181 to 360 days overdue	-	32	99 729	113	99 87
- over 360 days overdue	-	12	91 253	798	92 06
Loss allowances for expected credit losses	(50 459)	(21 957)	(246 079)	(753)	(319 248
Carrying value of other consumer loans to individuals	1 243 989	42 336	60 129	488	1 346 94
Total loans and advances to customers	12 764 573	126 035	390 933	488	13 282 02

The Bank classifies loans and advances to customers by credit quality based on the borrower's financial condition and ability to service the debt.

Information on collateral as at 31 December 2021 is summarised below:

In thousands of hryvnias	Corporate Ioans	Car loans	Mortgage Ioans	Consumer Ioans	Total
Unsecured loans Loans collateralised by:	947 840	234 927	16 390	1 764 909	2 964 066
- cash deposits	361 058	-	-	-	361 058
- residential real estate	278 131	317	2 768 016	321	3 046 785
- other real estate	3 607 001	-	82 870	-	3 689 871
- other assets	3 917 773	3 382 673	96 093	849	7 397 388
Total loans and advances to customers (before expected credit losses)	9 111 803	3 617 917	2 963 369	1 766 079	17 459 168

Information on collateral as at 31 December 2020 is summarised below:

In thousands of hryvnias	Corporate Ioans	Car loans	Mortgage Ioans	Consumer Ioans	Total
Unsecured loans	804 102	204 105	4 621	1 663 647	2 676 475
Loans collateralised by:					
- cash deposits	291 737	-	-	-	291 737
- residential real estate	184 982	442	1 739 158	333	1 924 915
- other real estate	2 661 356	-	68 578	-	2 729 934
- other assets	3 727 322	2 741 755	34 169	2 210	6 505 456
Total loans and advances to customers (before expected credit losses)	7 669 499	2 946 302	1 846 526	1 666 190	14 128 517

The information on the collateral in the table above includes financial lease receivables. Namely, as at 31 December 2021 in the amount of loans secured by other assets, included financial lease receivables from legal entities in the amount of UAH 1 060 644 thousand (as at 31 December 2020 - UAH 1 061 985 thousand) and UAH 24 432 thousand - individuals (car loans) (as at 31 December 2020 - UAH 14 143 thousand). In the amount of loans secured by deposits, included financial lease receivables from legal entities in the amount of UAH 5 279 thousand (as at 31 December 2020 - UAH 2 900 thousand).

Other assets mainly include equipment, other movable property and property rights for future real estate. The disclosure above represents the lower of the carrying value of the loan or fair value of collateral taken as at 31 December, depending on what is the lowest amount; the remaining part is disclosed within the unsecured exposures. The carrying value of the loans was allocated based on liquidity of the assets taken as collateralised.

The financial effect of collateral is presented by disclosing collateral values separately for (i) those assets where collateral and other credit enhancements exceed its carrying value ("over-collateralised assets") and (ii) those assets where collateral and other credit enhancements equal to their carrying value or are lower than their carrying value ("under-collateralised assets").

The analysis below covers only the individually impaired loans.

The effect of collateral on individually impaired loans as at 31 December 2021 is summarised below:

	Over-collateralised assets		Under-collat	eralised assets
In thousands of hryvnias	Carrying value of the asset	Fair value of collateral with discounts and expected disposal terms	Carrying value of the asset	Fair value of collateral with discounts and expected disposal terms
Corporate loans	63 186	105 514	98 859	76 211
Mortgage loans	8 233	10 163	4 871	3 112
Consumer loans	-	-	103	-
Car loans	998	2 085	25	-
Total	72 417	117 762	103 858	79 323

The effect of collateral on individually impaired loans as at 31 December 2020 is summarised below:

	Over-collateralised assets		Under-collat	eralised assets
In thousands of hryvnias	Carrying value of the asset	Fair value of collateral with discounts and expected disposal terms	Carrying value of the asset	Fair value of collateral with discounts and expected disposal terms
Corporate loans	112 629	132 815	66 072	50 053
Mortgage loans	1 229	1 975	22 853	14 221
Consumer loans	-	-	-	-
Car loans	-	-	3 812	3 055
Total	113 858	134 790	92 737	67 329

For other commercial loans without specifically identified impairment, the fair value of collateral was estimated at the inception of the loans and is adjusted for subsequent changes in value once a year in line with the significant market changes in value for real estate or for other pledged assets in accordance with the Bank's policies and procedures.

The fair value of collateral is the amount for which an asset could be exchanged between knowledgeable, willing parties in an arm's length transaction, discounted for the time required for its recovery and disposal. This amount includes possible costs of debt recovery through the foreclosure such as court expenses, disposal costs and other costs related to debt recovery through the foreclosure.

The fair value of real estate properties at the end of the reporting period is based on the actual expert opinion of the firm of independent appraisers engaged by the Bank on a contractual basis or by the internal appraiser who holds a relevant qualification certificate, which are not related (affiliates, related parties, associates) to the Bank according to the legislation.

The Bank's credit risk management policies and procedures are described in Note 31. The maximum credit risk exposure represents the carrying value of loans and advances at the relevant reporting date.

Collateral and other ways to improve the quality of loans and advances are described below.

The Bank accepts the following types of collateral:

- Loans to individuals residential mortgage property and cars;
- Loans to legal entities and industrial companies corporate properties such as property, plant and equipment, shares, accounts receivable and third party guarantees;
- Commercial real estate development real property for which the financing has been received.

Although collateral might be an important factor to mitigate the credit risk, the Bank's policy provides for granting loans primarily based on the customer's creditworthiness rather than the proposed collateral value. Depending on the customer's condition and banking product, loans may be issued without taking collateral.

Finance lease receivables are included to loans. The table below summarizes reconciliation between gross investments in lease and present value of minimal lease payments as at 31 December 2021:

In thousands of hryvnias	Gross investment in lease	Present value of minimum lease payments	Unrealized financial income
Finance lease receivables			
- less than 1 year	756 704	696 266	60 438
- from 1 to 5 years	438 260	392 266	45 994
- over 5 years	3 842	3 390	452
Less loss allowances for expected credit losses	(25 656)	(25 656)	-
Total after deduction of loss allowances for expected credit losses	1 173 150	1 066 266	106 884

The table below summarizes reconciliation between gross investments in lease and present value of minimal lease payments as at 31 December 2020:

In thousands of hryvnias	Gross investment in lease	Present value of minimum lease payments	Unrealized financial income
Finance lease receivables			
- less than 1 year	736 535	636 930	99 605
- from 1 to 5 years	526 488	448 279	78 209
- over 5 years	174	171	3
Less loss allowances for expected credit losses	(30 033)	(30 033)	-
Total after deduction of loss allowances for expected credit losses	1 233 164	1 055 347	177 817

Refer to Note 34 for the estimated fair value of each class of loans and advances to customers. Interest rate analysis of loans and advances to customers is disclosed in Note 31. Information on related party balances is disclosed in Note 36.

Modified financial assets

The table below provides information on financial assets that were modified when the amount of the loss allowance was estimated at an amount equal to the amount of lifetime expected credit losses.

In thousands of hryvnias	2021	2020
Financial assets modified during the period		
Amortised cost before modification	58 296	69 382
Gains less losses from modification	(1 547)	(1 233)
Financial assets modified since initial recognition	· · · ·	()
Gross carrying amount at 31 December of financial assets for which loss		0 500
allowance has changed to 12-month measurement during the period	-	6 533

9 Securities

In thousands of hryvnias	31 December 2021	31 December 2020
Securities at fair value through other comprehensive income		
Ukrainian government bonds	7 814 337	5 897 526
Corporate shares	10	10
Total securities at fair value through other comprehensive income	7 814 347	5 897 536
Securities at amortized cost		
Ukrainian government bonds	-	290 847
Loss allowances for expected credit losses	-	(1 154)
Totalsecurities at amortized cost	-	289 693
Total securities	7 814 347	6 187 229

As at 31 December 2021, sovereign credit rating of Ukraine assigned by Standard & Poor's is B (31 December 2020: B).

The Bank pledged government bonds with a total nominal value of UAH 104 384 thousand as collateral under loan obtained from the Entrepreneurship Development Fund (Note 17).

The Bank pledged government bonds with a total nominal value of UAH 3 284 691 thousand on a refinancing loan received from the National Bank of Ukraine (as at 31 December 2020- UAH 2 456 740 thousand) (Note 15).

9 Securities (continued)

The movements in amounts of expected credit losses on securities during 2021 are as follows:

In thousands of hryvnias	Note	Securities at fair value through other comprehensive income	Securities at amortized cost	Total
Ukrainian government bonds				
Loss allowances for 12-months expected credit losses at 1 January 2021 - Stage 1		87 934	1 154	89 088
Repayment and sales of assets during the period	25	(59 768)	(584)	(60 352)
Increase from acquisition of assets during the period	25	124 187	-	124 187
Remeasurement of loss allowance* Effect of exchange rate of foreign currency	25	(44 613) (2 841)	(566) (4)	(45 179) (2 845)
Loss allowances for 12-months expected credit losses at 31 December 2021 - Stage 1		104 899	-	104 899

* Remeasurement of loss allowance for expected credit losses includes the changes for securities acquired during 2021, for which there was a change in the level of expected credit losses from the date of acquisition to the end of the year, as well as in securities purchased until 2021 that remained in the portfolio at 31 December 2021.

During 2021 the Bank purchased UAH 7 226 147 thousand of securities (2020: UAH 6 341 418 thousand) that resulted in increase of allowance for expected credit losses by UAH 124 187 thousand (2020: by UAH 98 695 thousand). During 2021 the Bank sold and obtained repayment of securities for UAH 5 464 797 thousand (2020: UAH 3 705 843 thousand), that together with changes in credit risk during the period for purchased, repaid and sold instruments resulted in reduction of allowance for expected credit losses by UAH 105 531 thousand (2020: by UAH 55 654 thousand).

9 Securities (continued)

The movements in amounts of expected credit losses on securities during 2020 are as follows:

In thousands of hryvnias	Note	Securities at fair value through other comprehensive income	Securities at amortized cost	Total
Ukrainian government bonds				
Loss allowances for 12-months expected credit losses at 1 January 2020 - Stage 1		32 107	6 403	38 510
Repayment and sales of assets during the period	25	(12 637)	(570)	(13 207)
Increase from acquisition of assets during the period	25	98 695	-	98 695
Remeasurement of loss allowance * Effect of exchange rate of foreign currency	25	(36 705) 6 474	(5 742) 1 063	(42 447) 7 537
Loss allowances for 12-months expected credit losses at 31 December 2020 - Stage 1		87 934	1 154	89 088
Corporate bonds				
Loss allowances for expected credit losses for credit-impaired assets as at 31 January 2020 – Stage 3		-	23 261	23 261
Write-off from reserves		-	(23 261)	(23 261)
Loss allowances for expected credit losses for credit-impaired assets as at 31 December 2020 – Stage 3		-	-	-
Loss allowances for expected credit losses for credit-impaired assets as at 31 December 2020 – Stage 3		87 934	1 154	89 088

* Remeasurement of loss allowance for expected credit losses includes the changes for securities acquired during 2020, for which there was a change in the level of expected credit losses from the date of acquisition to the end of the year, as well as in securities purchased until 2020 that remained in the portfolio at 31 December 2020.

10 Investment property

In thousands of hryvnias	Note	2021	2020
Investment properties at fair value at 1 January		14 054	28 506
Transfers from real estate occupied by the Bank	11	-	1 847
Transfers to real estate occupied by the Bank	11	(1 949)	(16 716)
Net change of fair value		(334)	417
Investment properties at fair value at 31 December		11 771	14 054

As at 31 December 2021 and 31 December 2020, investment properties include commercial buildigs held by the Bank to earn rental income, which were transferred from property, plant and equipment and leasehold improvements.

Information on income from operating lease is disclosed in Note 26.

As at 31 December 2021 and 31 December 2020, fair value of the Bank's investment properties was determined based on the reports of internal appraiser who holds the relevant professional qualification and has recent experience in valuation of property of the similar category and location. Valuation is based on market value of a

The fair values of investment properties are categorised into Level 3 of the fair value hierarchy as at 31 December 2021 and 2020 (Note 34).

11 Property, plant and equipment

The movement of property, plant and equipment as well as assets in the form of right-of- use is presented as follows:

	Property and leasehold improvements	Computer and equipment	Security systems, cars and other	Right-of-us Property and leasehold improvements	e assets Computer and equipment	Total
In thousands of hryvnias			equipment	•		
Cost or valuation						
At 1 January 2020	380 073	656 932	399 874	199 543	4 585	1 641 007
Additions	25 849	49 386	48 076	65 169	-	188 480
Disposals	(11 393)	(8 379)	(15 673)	(55 380)	(4 585)	(95 410)
Transfers	14 869	-	(25)	-	-	14 844
At 31 December 2020	409 398	697 939	432 252	209 332	-	1 748 921
Additions	9 421	27 788	33 367	103 217	-	173 793
Disposals	(9 359)	(23 267)	(22 979)	(57 324)	-	(112 929)
Transfers	1 949	-	(2 633)	-	-	(684)
At 31 December 2021	411 409	702 460	440 007	255 225	-	1 809 101
Accumulated depreciation						
At 1 January 2020	35 674	287 860	195 872	49 925	764	570 095
Depreciation charge	23 786	69 867	58 810	83 195	286	235 944
Disposals	(2 241)	(8 363)	(11 724)	(41 233)	(1 050)	(64 611)
At 31 December 2020	57 219	349 364	242 958	91 887	-	741 428
Depreciation charge	23 147	69 124	56 684	73 781	-	222 736
Disposals	(3 637)	(23 298)	(18 373)	(45 542)	-	(90 850)
At 31 December 2021	76 729	395 190	281 269	120 126	-	873 314
Carrying amount						
At 31 December 2020	352 179	348 575	189 294	117 445	-	1 007 493
At 31 December 2021	334 680	307 270	158 738	135 099	-	935 787

The Bank presents right-of use assets that related to leased real estate and do not meet the definition of investment property in "Property, plant and equipment".

As at 31 December 2021, the cost of fully depreciated equipment that is still in use is UAH 269 363 thousand (31 December 2020: UAH 201 642 thousand).

As at 31 December 2021 and 31 December 2020, the Bank has no property, plant and equipment of which ownership, use and disposal are limited by laws of Ukraine.

The Bank's property, plant and equipment were not revaluated as at 31 December 2021 and 31 December 2020 as its carrying value at the annual balance sheet date did not differ significantly from the fair value according to the appraisers' conclusions.

The valuation was based on a market approach and was carried out by the internal appraiser who holds relevant professional qualification and has recent experience in valuation of property of similar location and category. For each real estate property several comparables were selected based on the following criteria: location, type, condition and size. Adjustments were applied for a price representing an offer rather than an actual transaction (bargain discount), location, size, floor and condition and other adjustments. Bargain discount applied by the internal appraiser was usually in the range from 10% to 15%. Other adjustments applied by the internal valuator were usually in the range from 10% to 15%. The valuer used only a market approach to valuate all objects of property, plant and equipment.

11 Property, plant and equipment (continued)

The fair value of the Bank's buildings are categorised into Level 3 of the fair value hierarchy.

Had the assets been recognised at cost less depreciation, the carrying value of the property, plant and equipment would have amount to UAH 156 450 thousand as at 31 December 2021 (31 December 2020: UAH 198 853 thousand).

Leases

Movements in lease liability in 2021 were as follows:

In thousands of hryvnias	Note	2021	2020
Balance at 1 January		123 712	153 415
Changes from financing cash flows:			
Payment of lease liabilities - principal		(77 674)	(73 098)
Total changes from financing cash flows		(77 674)	(73 098)
Effect of exchange rate of foreign currency		(1 347)	(1 314)
Other changes:			
Lease additions		101 637	37 408
Other changes:		(11 015)	7 517
Interest expense	23	14 285	21 391
Interest paid		(14 487)	(21 607)
Total liability-related other changes		90 420	44 709
Balance at 31 December	19	135 111	123 712

Rental income recognised by the Bank during 2021 was UAH 3 292 thousand (2020: UAH 3 674 thousand) (Note 26).

12 Intangible assets

Movements in intangible assets in 2021 were as follows:

	Software	Rights and	Other intangible	Total
In thousands of hryvnias		licenses	assets	
Cost or valuation				
At 1 January 2020	141 612	174 634	2 151	318 397
Additions	58 471	60 898	-	119 369
Disposals	(48)	-	-	(48)
At 31 December 2020	200 035	235 532	2 151	437 718
Additions	84 165	65 422	-	149 587
Disposals	-	-	-	-
At 31 December 2021	284 200	300 954	2 151	587 305
Accumulated depreciation At 1 January 2020	62 721	116 775	1 560	181 056
Depreciation charge Disposals	24 286	56 070	118	80 474
At 31 December 2020	87 007	172 845	1 678	261 530
Depreciation charge	36 586	65 370	118	102 074
Disposals	-	-	-	-
At 31 December 2021	123 593	238 215	1 796	363 604
Carrying amount				
At 31 December 2020	113 028	62 687	473	176 188
At 31 December 2021	160 607	62 739	355	223 701

Initial value of fully depreciated intangible assets still in use - UAH 157 788 thousand (as at December 31, 2020 - UAH 92 700 thousand)

As at 31 December 2021 and 31 December 2020 the Bank has no intangible assets pledged as collateral. However, there are restrictions on the ownership of computer software licenses used by the Bank.

13 Other financial assets

In thousands of hryvnias	31 December 2021	31 December 2020
Receivables from operations with plastic cards	90 458	94 198
Receivables from operations with customers and banks and other	31 859	44 110
Fees and commissions to be received	29 312	17 983
Cash that is unconfirmed	1 062	-
Loss allowances for expected credit losses	(3 567)	(2 589)
Total other financial assets	149 124	153 702

The analysis of change in the loss allowances for expected credit losses of other financial assets during 2021 is as follows:

In thousands of hryvnias	Note	Fees and commissions to be received (Stage 2,3)	Receivables from operations with customers and banks and other (Stage 3)	Cash that is unconfirmed (Stage 3)	Total
Loss allowances for expected credit		2 139	450	-	2 589
losses as at 1 January 2021 Increase from acquisition of assets during the period	25	-	-	1 062	1 062
Net remeasurement of loss allowance during the year	25	1 448	344	-	1 792
Amounts written off during the year as uncollectible		(1 630)	(327)	-	(1 957)
Effect of exchange rate of foreign currency		-	81	-	81
Loss allowances for expected credit losses as at 31 December 2021		1 957	548	1 062	3 567

The analysis of change in the loss allowances for expected credit losses of other financial assets during 2020 is as follows:

In thousands of hryvnias	Note	Fees and commissions to be received (Stage 2,3)	Receivables from operations with customers and banks and other (Stage 3)	Total
Loss allowances for expected credit losses as at 1 January 2020		1 885	285	2 170
Net remeasurement of loss allowance during the year	25	2 503	1 147	3 650
Amounts written off during the year as uncollectible		(2 249)	(1 010)	(3 259)
Effect of exchange rate of foreign currency		-	28	28
Loss allowances for expected credit losses as at 31 December 2020		2 139	450	2 589

The amount of loss allowances for expected credit losses on accrued income that are not impaired as at 31 December 2021 is UAH 108 thousand (at 31 December 2020 - UAH 66 thousand).

Receivables from operations with customers and banks in the amount of UAH 31 311 thousand as at 31 December 2021 (31 December 2020 - UAH 43 660 thousand) and receivables from operations with plastic cards in the amount of UAH 90 458 thousand (31 December 2020 - UAH 94 198 thousand) are represented by transit accounts for transfers and payment cards that are subject to the clearing on the next business day, and for which no expected credit losses assessment is performed.

13 Other financial assets (continued)

Analysis by credit quality of other financial assets at 31 December 2021 is as follows:

In thousands of hryvnias	Fees and commissions to be received	Receivables from operations with customers and banks and other	Receivables from operations with plastic cards	Cash that is unconfirmed (Stage 3)	Total
Assets without estimation of					
expected credit losses (not overdue)	-	31 311	90 458	-	121 769
Past due but not impaired other					
financial assets with 12-month					
expected credit losses (Stage 2)					
 not yet past due 	22 004	-	-	-	22 004
 less than 30 days overdue 	165	-	-	-	165
- 31 to 90 days overdue	414	-	-	-	414
Credit-impaired other financial					
assets (Stage 3)					
 not yet past due 	-	548	-	1 062	1 610
 91 to 180 days overdue 	1 935	-	-	-	1 935
- 181 to 360 days overdue	894	-	-	-	894
- over 360 days overdue	3 900	-	-	-	3 900
Total credit-impaired other	6 700	E 4 0		1 062	0 220
financial assets (gross)	6 729	548	-	1 002	8 339
Less loss allowances for expected credit losses	(1 957)	(548)	-	(1 062)	(3 567)
Total other financial assets	27 355	31 311	90 458	-	149 124

Analysis by credit quality of other financial assets at 31 December 2020 is as follows:

In thousands of hryvnias	Fees and commissions to be received	Receivables from operations with customers and banks and other	Receivables from operations with plastic cards	Total
Assets without estimation of				
expected credit losses (not overdue)	-	43 660	94 198	137 858
Past due but not impaired other financial assets with 12-month expected credit losses (Stage 2)				
- not yet past due	7 666	-	-	7 666
- less than 30 days overdue	41	-	-	41
- 31 to 90 days overdue	2 448	-	-	2 448
Credit-impaired other financial assets (Stage 3)				
- not yet past due	-	450	-	450
- 91 to 180 days overdue	488	-	-	488
- 181 to 360 days overdue	1 200	-	-	1 200
- over 360 days overdue	6 140	-	-	6 140
Total credit-impaired other financial assets (gross)	7 828	450	-	8 278
Less loss allowances for expected credit losses	(2 139)	(450)	-	(2 589)
Total other financial assets	15 844	43 660	94 198	153 702

The primary factors that the Bank considers in determining whether a receivable is impaired are its overdue status. As a result, the Bank presents above an ageing analysis of receivables that are individually determined to be impaired. Other receivables generally are not collaterised.

Information on related party balances is disclosed in Note 36.

14 Other non-financial assets

	31 December	31 December
In thousands of hryvnias	2021	2020
Inventory	39 459	15 138
Prepayments for goods and unfinished construction	36 646	33 577
Prepaid expenses	32 635	60 364
Prepayment for services	10 653	10 938
Prepaid taxes other than income tax	8 451	9 684
Repossessed collateral and assets for sale	1 612	2 433
Receivables from settlements with employees and other	79	29
Total other non-financial assets	129 535	132 163

15 Due to other banks

In thousands of hryvnias	31 December 2021	31 December 2020
Correspondent accounts and overnight placements of other banks	708 227	535 233
Loans from the National Bank of Ukraine through refinancing	3 000 000	2 300 000
Funds in settlements for escrow operations	3 856	4 047
Total due to other banks	3 712 083	2 839 280

As at 31 December 2021 correspondent accounts and overnight deposits of other banks include UAH 132 266 thousand (31 December 2020: UAH 91 210 thousand) of balances on accounts of PKO BP S.A.

In 2021, the Bank received a refinancing loan from the National Bank of Ukraine in the amount of UAH 3 000 000 thousand (2020: UAH 2 300 000 thousand). The Bank pledged a domestic government bond totaling UAH 3 284 691 thousand as collateral for the loan in nominal value (31 December 2020: UAH 2 456 740 thousand).

Refer to Note 34 for the disclosure of the fair value of each class of amounts due to other banks. Interest rate analysis of due to other banks is disclosed in Note 31. Information on related party balances is disclosed in Note 36.

KREDOBANK JSC Notes to the Separate Financial Statements – 31 December 2021

16 Customer accounts

In thousands of hryvnias	31 December 2021	31 December 2020
Legal entities		
- Current/settlement accounts	11 557 569	8 132 064
- Term deposits	2 815 043	2 448 576
Individuals		
- Current/demand accounts	5 526 852	3 676 230
- Term deposits	4 618 794	4 062 895
Total customer accounts	24 518 258	18 319 765

Economic sector concentrations within customer accounts are as follows:

	31 December	31 December 2021		31 December 2020	
In thousands of hryvnias	Amount	%	Amount	%	
Individuals	10 145 646	41	7 739 125	42	
Other services	2 931 510	12	2 586 401	14	
Trade	2 617 775	11	1 575 078	9	
Manufacturing	2 114 281	9	2 330 332	13	
Financial services	1 870 643	8	1 117 894	6	
Real estate	1 596 947	6	963 436	5	
Agriculture	646 279	3	636 841	4	
Transport and communication	334 041	1	365 012	2	
Other	2 261 136	9	1 005 646	5	
Total customer accounts	24 518 258	100	18 319 765	100	

As at 31 December 2021, the Bank had 283 customers (31 December 2020: 214 customers) with balances above UAH 10 000 thousand each. The aggregate balance on accounts of these customers was UAH 9 728 678 thousand (31 December 2020: UAH 6 493 638 thousand), or 40% (31 December 2020: 35%) of total customer accounts.

As at 31 December 2021, included in customer accounts are deposits of UAH 39 933 thousand (31 December 2020: UAH 161 330 thousand) held as collateral for guarantees issued. Refer to Note 33.

As at 31 December 2021, included in current accounts of individuals are prepayments at loan agreements amounting UAH 60 737 thousand that are not due (31 December 2020: UAH 140 555 thousand).

As at 31 December 2021, included in customer accounts are deposits amounted to UAH 436 586 thousand (31 December 2020: UAH 436 586 thousand) held as collateral for loans granted to customers amounted to UAH 361 058 thousand (31 December 2020: UAH 291 737 thousand). Refer to Note 8.

Refer to Note 34 for the disclosure of the fair value of each class of customer accounts. Interest rate analysis of customer accounts is disclosed in Note 31. Information on related party balances is disclosed in Note 36.

17 Due to other financial institutions

	31 December	31 December
In thousands of hryvnias	2021	2020
Entrepreneurship Development Fund	101 080	115 580
Total other financial institutions	101 080	115 580

In October 2019, the Bank received a loan for a term of two years from the Entrepreneurship Development Fund in the amount of UAH 100 000 thousand at the rate of UIRD 3 months (UIRD - Ukrainian Index of Retail Deposit Rates) multiplied by a factor of 0.774. In October 2021 the loan was repaid.

In October 2021, the Bank received a loan for a term of two years from the Entrepreneurship Development Fund in the amount of UAH 100 000 thousand at the rate of UIRD 3 months, which is 7.27% as at 31 December, 2021. According to the agreement, the funds are allocated for lending to small and medium-sized enterprises within the framework of the fund's program to support the financing of investment projects of small and medium-sized businesses in Ukraine.

The Bank pledged domestic bonds with a total nominal value of UAH 104 384 thousand as collateral for the received loan (Note 9).

Change in amounts due to other financial institutions during 2021 and 2020 are presented as follows:

In thousands of hryvnias	2021	2020
Due to other financial institutions as at 1 January	115 580	276 991
Repayment during the year	-	(54 889)
Interest accrued	5 906	12 082
Interest paid	(6 081)	(16 214)
Other changes	(14 325)	(102 390)
Due to other financial institutions as at 31 December	101 080	115 580

Refer to Note 34 for the disclosure of the fair value of due to other financial institutions.

18 Debt securities

In November 2017 the Bank performed placement of bonds of series «A» with a total nominal value of UAH 250 000 thousand.

In July 2018 the Bank performed placement of bonds of series «B» with a total nominal value of UAH 250 000 thousand. This series of bonds was fully acquired by the European Fund for South-Eastern Europe (SICAV-SIF).

As at the date of issue of these separate financial statements, bonds of series «A» were included in the stock exchange listing of PUBLIC JOINT-STOCK COMPANY "UKRAINIAN EXCHANGE". Bonds of both issues were afloat and were included in the stock exchange listing of PUBLIC JOINT STOCK COMPANY "STOCK EXCHANGE" PERSPECTYVA".

Since the beginning of 2020, the series A bonds have been redempted with a total number of 16 352 units, with a total value of UAH 16 372 thousand (2020: 2 430 units, with a total value of UAH 2 445 thousand). The Bank can sell the redempted bonds at any time. In 2021, 117 225 bonds of series "A" with value in the amount UAH 119 748 thousand were placed (2020: 116 740 units with a total value of UAH 118 966 thousand).

As at 31 December 2021 the nominal value of Bank's obligations on issued bonds was UAH 486 123 thousand (As at 31 December 2020: UAH 384 810 thousand).

During 2021 interest on issued bonds paid amounted to UAH 47 923 thousand (2020: UAH 67 845 thousand). Refer to Note 34 for the disclosure of the fair value of debt securities.

19 Other financial liabilities

Other financial liabilities are presented as follows:

In thousands of hryvnias	Note	31 December 2021	31 December 2020
Lease liabilities	11	135 111	123 712
Other accrued liabilities		69 621	71 364
Funds in settlements		27 673	21 728
Provision for credit related commitments	33	21 871	29 123
Other		527	601
Total other financial liabilities		254 803	246 528

Provision for credit related commitments represents expected credit losses on financial guarantees and loan commitments. Information about movement of the provision for loan commitments is disclosed in Note 33.

Refer to Note 34 for disclosure of fair value of each class of other financial liabilities.

20 Other non-financial liabilities

Other non-financial liabilities are presented as follows:

	31 December	31 December
In thousands of hryvnias	2021	2020
Accrued employee benefit costs	100 910	103 674
Amounts payable to Individuals' Deposits Guarantee Fund	20 180	15 150
Taxes payable other than on income	17 032	15 411
Deferred income	14 355	14 871
Commitment provision	12 094	8 117
Accounts payable for the acquisition of assets	3 723	9 578
Total other non-financial liabilities	168 294	166 801

Movements in the commitment provision are disclosed in Note 33.

KREDOBANK JSC Notes to the Separate Financial Statements – 31 December 2021

21 Share capital

In thousands of hryvnias, except for number of	Number of		
shares	outstanding shares	Nominal amount	Total
At 1 January 2020	224 896 946 916	2 248 969	2 248 969
At 31 December 2020	224 896 946 916	2 248 969	2 248 969
At 31 December 2021	224 896 946 916	2 248 969	2 248 969

The share capital of the Bank amounts to UAH 2 248 969 thousand (2020: UAH 2 248 969 thousand).

As at 31 December 2021 and 31 December 2020, the total number of issued shares, at which the reports on placement results were registered, comprised 224 896 946 916 ordinary shares with nominal value of UAH 0.01 per share. All ordinary shares have equal voting rights.

As at 31 December 2021 and 2020 all ordinary shares were fully paid and registered.

The Bank's shareholder structure is presented below:

Shareholder	2021	2020
PKO BP S.A.	100,00%	100,00%

22 Other comprehensive income recognized in equity

Analysis of other comprehensive income by equity component item is as follows:

In thousands of hryvnias	Revaluation reserve for financial instruments at fair value through other comprehensive income	Revaluation reserve for property, plant and equipment	Total
Year ended 31 December 2020		• •	
Financial instruments at fair value through other			
comprehensive income:			
 Net change in the fair value of financial instruments at fair value through other comprehensive income 	7 747	-	7 747
- Net change in the fair value of financial instruments at			
fair value through other comprehensive income	(3 779)	-	(3 779)
transferred to net profit and loss	()		(/
Revaluation of property, plant and equipment	-	102	102
Total other comprehensive income	3 968	102	4 070
Year ended 31 December 2021			
Financial instruments at fair value through other			
comprehensive income:			
- Net change in the fair value of financial instruments at	36 321	-	36 321
fair value through other comprehensive income			
- Net change in the fair value of financial instruments	(5.010)		(5.040)
at fair value through other comprehensive income transferred to net profit and loss	(5 910)	-	(5 910)
Total other comprehensive income	30 411	-	30 411

23 Interest income and expense

	2021	2020
In thousands of hryvnias		
Interest income		
Loans and advances to individuals	1 279 138	1 276 264
Loans and advances to legal entities	956 437	847 109
Securities at fair value through other comprehensive income	430 012	253 893
Deposit certificates issued by the NBU	10 316	21 517
Securities at amortised cost	2 486	23 113
Due from other banks	172	1 796
Total interest income	2 678 561	2 423 692
Interest expense		
Customer accounts of individuals	203 175	290 743
Customer accounts of legal entities	197 504	216 406
Amounts due to the National Bank of Ukraine	198 157	50 855
Debt securities	45 860	56 663
Due to other banks	32 512	8 609
Lease liabilities	14 285	21 391
Other	-	1
Total interest expense	691 493	644 668
Net interest income	1 987 068	1 779 024

Interest income on impaired financial assets amounts to UAH 76 337 thousand for 2021 (2020: UAH 15 238 thousand).

Information on interest income and expense on transactions with related parties is disclosed in Note 36.

24 Fee and commission income and expense

In thousands of hryvnias	2021	2020
Fee and commission income		
Cash and settlement transactions	548 369	483 153
Purchase and sale of foreign currency	137 167	108 073
Agency fee from insurance companies	29 703	21 090
Guarantees issued and other documentary	8 426	7 851
Other	15 776	14 805
Total fee and commission income	739 441	634 972
Fee and commission expense		
Cash and settlement transactions	187 240	160 334
Loan transaction fees	1 939	407
Received guarantees and other documentary	857	513
Transactions with securities	677	628
Other	39	42
Total fee and commission expense	190 752	161 924
Net fee and commission income	548 689	473 048

Information on fee and commission income and expense on transactions with related parties is disclosed in Note 36.

25 Credit loss expense on financial assets

In thousands of hryvnias	Note	2021	2020
Due from other banks	7	(194)	245
Loans and advances to customers	8	182 572	302 039
Securities at fair value through other comprehensive income	9	19 806	49 353
Securities at amortized cost	9	(1 150)	(6 312)
Other financial assets - fees and commission income	13	1 448	2 503
Other financial assets - non-confirmed cash	13	1 062	-
Other financial assets - transactions with customers	13	344	1 147
Financial guarantee contracts	33	(544)	(60)
Loan commitments	33	(6 230)	12 787
Credit loss expense on financial assets		197 114	361 702

In addition to the expected credit losses on initial recognition, derecognition and other remeasurements (refer to Note 8), loans and advances to customers for 2021 include repayments of loans written off in prior periods as uncollectible in the amount of UAH 15 888 thousand (2020 - UAH 10 217 thousand).

26 Other operating income

In thousands of hryvnias	2021	2020
Penalties and fine received	15 193	18 358
Support of operations from partner companies	12 257	9 866
Gain from disposal of property, plant and equipment	7 437	4 251
Enrollment in income balances on which the statute of limitations has	6 428	1 519
expired Income from operating leases	3 292	3 674
Income from factoring operations	1 340	-
Gain from leasing contracts	1 249	3 498
Gain from leases modification	1 237	3 879
Income from repayment of purchased credit debt	761	-
Income from revaluation of investment property	107	321
Insurance compensations	27	118
Income from revaluation of property, plant and equipment	13	103
Other	1 325	2 184
Reimbursement of legal expenses	(415)	2 512
Total other operating income	50 251	50 283

27 Administrative and other operating expenses

In thousands of hryvnias	2021	2020
Wages, bonuses and other employee costs	558 409	519 459
Social contributions accrued on employee benefits	115 139	104 619
Total employee payments expenses	673 548	624 078
Software maintenance	118 065	106 385
Contributions to Individuals' Deposit Guarantee Fund	72 803	58 931
Utilities	56 973	49 759
Communication	53 498	42 405
Repair and maintenance of property, plant and equipment	50 808	60 261
Professional services	26 691	18 597
Advertising and marketing services	24 981	12 085
Legal services	21 341	13 420
Security services	17 630	25 947
Taxes other than on income	9 668	8 005
Collection and transportation of valuables	7 107	5 678
Cybersecurity systems	6 610	7 391
Operating lease expense for buildings	3 830	4 119
Business trips	3 789	3 042
Impairment and disposal of property, plant and equipment	3 776	2 706
Charity	2 610	5 192
Leases modification	495	895
Other	45 722	29 631
Total administrative and other operating expenses	526 397	454 449

No discretionary pensions or other post-employment benefits are provided by the Bank.

28 Income tax

(a) Components of income tax expense

Components of income tax expense are presented as follows:

In thousands of hryvnias	2021	2020
Current tax	179 451	126 780
Deferred tax	(3 886)	(10 444)
Income tax expense	175 565	116 336

(b) Reconciliation of tax expense and profit or loss multiplied by applicable tax rate

The Bank's applicable income tax rate for Bank's income is 18%. Reconciliation of expected and actual income tax expense is presented as follows.

In thousands of hryvnias	2021	2020
Profit before tax	971 865	647 563
The theoretical tax charge at the current tax rate (18%) Tax effect of items which are not deductible or assessable for taxation purposes	174 936	116 561
- Costs related to debt forgiveness and formation of provisions not included for tax purposes	(1 281)	3 540
- Other costs not included for tax purposes	521	55
Effect of accounting policies changes and other changes of temporary differences	1 389	(3 820)
Income tax expense for the year	175 565	116 336

(c) Deferred taxes by type of temporary differences

Differences between IFRS and statutory tax regulations in Ukraine give rise to temporary differences between carrying amounts of assets and liabilities used for financial reporting purposes and their tax bases, and on tax losses carried forward.

28 Income tax (continued)

Tax effect of movements in these temporary differences is presented as follows:

In thousands of hryvnias	1 January 2021	Credited/ (charged) to profit or loss for the year	31 December 2021
Tax effect of deductible/(taxable) temporary			
differences			
Property, plant and equipment	34 410	5 267	39 677
Commitment provision and other losses	8 594	(1 381)	7 213
Net deferred tax asset	43 004	3 886	46 890
In thousands of hryvnias	1 January 2020	Credited/ (charged) to profit or loss for the year	31 December 2020
•			
Tax effect of deductible/(taxable) temporary differences			
Tax effect of deductible/(taxable) temporary	27 422	6 988	34 410
Tax effect of deductible/(taxable) temporary differences	27 422 5 138		34 410 8 594

The recognized deferred tax asset is the amount of income tax that may be credited against future income taxes and is recognized in the separate statement of financial position. Deferred income tax assets are recognized only to the extent that it is probable that the tax credit will be used. Estimation of future taxable profits and the amount of tax credit that can be used in the future is based on the medium-term business plan that prepares management and the results of its extrapolation for future periods.

29 Basic and diluted profit per share

The Bank prepared its consolidated financial statements and separate financial statements as at and for the year ended 31 December 2021 and 31 December 2020 in accordance with IFRS 10 "Consolidated financial statements" and IAS 27 "Separate financial statements". Basic profit per share is calculated and disclosed based on the IFRS consolidated financial statements. During the reporting period, the Bank had no dilutive financial instruments. Therefore, basic profit per share is equal to diluted profit per share.

Profit per share is calculated as follows:

In thousands of hryvnias	2021	2020
Profit/(loss) for the year attributable to ordinary shareholders	795 446	525 863
Weighted average number of ordinary shares in issue (thousands)	224 896 947	224 896 947
Basic and diluted profit per share attributable to shareholders of the Group (UAH per share)	0,0035	0,0023

30 Segment analysis

Operating segments are components engaged in business operations that may earn revenues or incur expenses, whose operating results are regularly reviewed by the chief operating decision maker (CODM) and for which discrete financial information is available. The CODM is a person or a Bank of persons who allocate resources and measure the Bank's performance. The CODM functions are performed by Management Board.

(a) Reportable segments

The Bank has the following three key reportable segments:

- Retail banking banking services to individuals including current and saving accounts, deposits, investments, credit and debit cards, consumer and mortgage loans, currency transactions, money transfers.
- Corporate banking direct debit facilities, current accounts, deposits, overdrafts, loans and other credit facilities.
- Treasury and investment banking financial instruments trading, capital market transactions, operations with foreign currencies and banknotes.

(b) Factors used to identify reportable segments

The Bank's segments represent strategic business units targeting different customers. They are managed separately since each business unit requires different marketing strategies and service levels.

(c) Measurement of operating segment profit or loss, assets and liabilities

Management Board reviews financial information prepared in accordance with the NBU requirements and IFRS.

The following approaches are applied to segment analysis.

- resources are reallocated among segments using internal interest rates set by Treasury Department. These internal interest rates are determined by reference to market interest rate benchmarks, contractual maturities of loans, and historical information on actual repayment of customer account balances;
- (ii) income tax, and certain other items are not allocated to segments.

For operating decision making purposes, segment performance is measured based on profit before tax.

Reports include information on intersegment transfer (internal) results of reportable segments. Transfer result is calculated as the difference between transfer revenue and transfer expense per each segment based on transfer prices set by major currency and maturity. For corporate and retail segments, transfer revenue is calculated as estimated revenue from sales of attracted resources to Treasury and Investment Banking segment at acquisition transfer prices; transfer expenses are calculated as estimated expenses on purchase of resources from Treasury and Investment Banking segment at transfer prices on placements.

Transfer prices and transfer revenue/expenses are calculated in accordance with "Methodology for determining and applying transfer prices within "KREDOBANK" approved by Resolution of Management Board No. 292 dated 11 March 2019).

30 Segment analysis (continued)

(d) Reportable segment profit or loss, assets and liabilities

Reportable segments for the year ended 31 December 2021 are presented as follows:

In thousands of hryvnias	Retail banking	Corporate banking	Treasury and Investment banking	Unallocated	Total
Reportable segment assets	7 875 350	8 980 306	14 920 926	1 445 002	33 221 584
Reportable segment liabilities	10 154 149	14 475 641	4 236 601	406 900	29 273 291
Capital expenditure	-	-	-	220 163	220 163

Capital expenditures represent additions to non-current assets other than financial instruments and deferred tax assets.

	Retail banking	Corporate banking	Treasury and Investment	Unallocated	Eliminations	Total
In thousands of hryvnias			banking			
2021						
External revenues:						
- Interest income	1 279 138	956 437	442 986	-	-	2 678 561
- Fee and commission	323 644	385 388	1 172	29 237	-	739 441
income						
- Other operating	24 471	2 955	24	22 801	-	50 251
income Gains less losses from						
			76 239			76 239
trading in foreign currencies	-	-	10 239	-	-	70 239
Foreign exchange						
translation gains less			7 801			7 801
losses	-	-	7 001	-	-	7 001
Gains less losses on						
derecognition of securities						
measured at fair value	_	-	5 910	-	-	5 910
through other			0010			0010
comprehensive income						
Revenues from other						
segments						
- Interest income	477 407	524 471	1 393 286	-	(2 395 164)	-
Total revenues	2 104 660	1 869 251	1 927 418	52 038	(2 395 164)	3 558 203
Interest expense	(942 909)	(851 056)	(1 278 407)	(14 285)	2 395 164	(691 493)
Credit loss expense on	(<i>'</i>	()	(<i>, ,</i>	(, , , , , , , , , , , , , , , , , , ,		,
financial assets	(177 816)	(7 347)	(18 462)	6 511	-	(197 114)
Provision for other cost	-	-	-	(6 172)	-	(6 172)
Gains less losses on						
derecognition of financial	26 069	(528)		(1 592)		23 949
assets measured at	20 009	(320)	-	(1 392)	-	23 343
amortised cost						
Fee and commission	(109 289)	(29 769)	(44 774)	(6 920)	_	(190 752)
expense	(103 203)	(20100)	(++ / / +)	(0 320)		(130 732)
Personnel expenses,						
depreciation costs, administrative and other	(650 744)	(568 198)	(307 467)	1 653	-	(1 524 756)
operating expenses		· · · ·				· ,
Segment result	249 971	412 353	278 308	31 233	-	971 865
Income tax expense for	273 31 1	712 333	210 300	51 233	-	
the year						(175 565)

30 Segment analysis (continued)

Reportable segments for the year ended 31 December 2020 are presented as follows:

In thousands of hryvnias	Retail banking	Corporate banking	Treasury and Investment banking	Unallocated	Total
Reportable segment assets	5 929 266	7 408 423	10 427 534	1 462 907	25 228 130
Reportable segment liabilities	7 747 351	10 678 691	3 286 104	394 402	22 106 548
Capital expenditure	-	-	-	242 680	242 680

Capital expenditures represent additions to non-current assets other than financial instruments and deferred tax assets.

	Retail banking	Corporate banking	Treasury and Investment	Unallocated	Eliminations	Total
In thousands of hryvnias			banking			
2021						
External revenues:	1 276 264	847 109	200.240			2 422 604
 Interest income Fee and commission 	1 276 264		300 319	-	-	2 423 692
income	280 859	326 356	1 475	26 282	-	634 972
- Other operating						
income	25 038	3 004	15	22 226	-	50 283
Gains less losses from						
trading in foreign	10 797	-	69 095	-	-	79 892
currencies						
Foreign exchange						
translation gains less	-	-	6 577	-	-	6 577
losses Gains less losses on						
derecognition of securities						
measured at fair value	-	-	3 774	-	-	3 774
through other			0111			• • • •
comprehensive income						
Revenues from other						
segments						
 Interest income 	504 581	511 038	1 412 335	-	(2 427 954)	
Total revenues	2 097 539	1 687 507	1 793 590	48 508	(2 427 954)	3 199 190
Interest expense	(1 092 873)	(826 611)	(1 131 747)	(21 391)	2 427 954	(644 668
Credit loss expense on financial assets	(203 170)	(99 405)	(43 286)	(15 841)	-	(361 702
Provision for other cost	_	_	_	(1 348)	_	(1 348
Gains less losses on	-	-	-	(1 340)	-	(1 540
derecognition of financial						
assets measured at	7 122	3 049	-	2 805	-	12 97
amortised cost						
Fee and commission	(110 334)	(12 223)	(35 687)	(3 680)	_	(161 924
expense	(110 334)	(12 223)	(33 007)	(5 000)	-	(101 324
Personnel expenses,						
depreciation costs, administrative and other	(665 820)	(599 947)	(126 587)	(2 607)	-	(1 394 961
operating expenses						
Segment result	32 464	152 370	456 283	6 446	-	647 56
Income tax expense for						(116 336
the year						(110 330
Profit for the year						531 227

(e) Analysis of revenues by product and service

Analysis of Bank's revenues by product and service is disclosed in Note 23 (interest income) and Note 24 (fee and commission income).

30 Segment analysis (continued)

(f) Geographical information

Ukraine represents the only geographical segment, as majority of revenues and assets are attributable to Ukraine. The Bank has no significant revenues from outside Ukraine and all its non-current assets other than financial instruments are attributable to Ukraine. Refer to Note 31 for geographical analysis of Bank's assets and liabilities.

(g) Major customers

The Bank has no customers representing more than 10% of total revenue of the Bank.

31 Financial risk management

Risk management relates to financial risks, operational risks, and legal risks. Financial risks comprise market risk (including currency risk, interest rate risk, and other price risk), credit risk, and liquidity risk. The purpose of financial risk management is to establish risk limits and ensure adherence to such limits. The operational and legal risk management is intended to ensure proper functioning of internal policies and procedures to minimise operational and legal risks.

Credit risk. The Bank is exposed to credit risk, which is the risk that a party to a financial instrument fails to meet its contractual obligations resulting in a financial loss to the other party. Exposure to credit risk arises as a result of the Bank's lending and other transactions with counterparties giving rise to financial assets.

The maximum exposure to credit risk is reflected in the carrying amounts of financial assets in the separate statement of financial position. For guarantees and credit related commitments, the maximum exposure to credit risk is the total amount of commitments (see Note 33). Credit risk is managed by making strategic decisions on acceptable credit risk, approving credit limits, updating principles and processes for credit risk assessment, implementing and improvement of risk assessment tools that allow maintaining risk within acceptable parameters, developing information tools that computerize credit risk assessment process and ensure quality and integrity of data used in the process, planning of operations and preparing recommendations, obtaining collateral, and by other tools intended to mitigate credit risk as described in Note 8.

The Bank structures its exposures to credit risk by establishing limits per borrower or group of borrowers. Management approves credit risk limits on a regular basis. Such risks are regularly monitored and reviewed at least on a yearly basis.

The Bank established the following corporate bodies responsible for approving credit limits per individual borrowers:

- Management Board reviews and approves credit applications up to USD 5.0 million and, in case of loan restructuring, up to USD 6.25 million;

- Supervisory Board reviews and approves credit applications above USD 5.0 million and, in case of loan restructuring, above USD 6.25 million;

- Credit Committee reviews and approves credit applications up to UAH 90 million, Small Credit Committee - up to UAH 25 million, and Credit Restructuring Committee - up to USD 5 million. Credit Committee and Small Credit Committee generally meet two times per week. Credit Restructuring Committee generally meet once a week;

- Deputies of the Chairman of Management Board and directors of the Head Office departments have individual powers to approve new credit decisions with the limits below UAH 2 million.

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31 Financial risk management (continued)

Loan applications prepared by account managers are forwarded to relevant department that performs credit analysis and makes a decision or passes them on to the relevant credit committee for approval of credit limit within the scope of authority. Exposure to credit risk is also managed by obtaining collateral and corporate and personal guarantees.

The basis of the analysis and assessment of the creditworthiness of clients - legal entities is the determination and establishment of an internal rating, which is carried out to determine the probability of default by the client and recognition of default status within 1 (one) year. Determining and establishing the internal rating of clients is not only a tool for reviewing individual loan proposals and supporting the credit decision-making process, but also a basis for providing a more detailed analysis of the quality of the Bank's loan portfolio.

The Bank's rating scale includes 24 rating categories, indicated in capital letters (from A1 to H3), depending on the risk of default by the client, and the probability of default for each rating category (in%).

The Credit Risk Department monitors the implementation of rating models, its timely review and updating.

The Bank reviews ageing of outstanding loans and follows up on past due balances. Management therefore considers it appropriate to provide ageing and other information about credit risk as disclosed in Notes 7,8,9 and 13.

The Bank organises an effective process of managing distressed assets in compliance with the following principles:

- economic feasibility the Bank's measures for managing distressed assets are economically and, if
 possible, statistically sound, and the Bank's calculations based on its own experience indicate that their
 implementation will ensure that the Bank receives economic benefits higher than the costs incurred
 during management distressed assets;
- 2. priority the Bank, when deciding on the option of debt settlement of the debtor / counterparty, measures aimed at the sale of recovered property, gives preference to the option / measures that provide the highest net present value of expected cash flows from the asset;
- 3. timeliness identification of assets with signs of potential problems at an early stage and taking timely and adequate measures aimed at reducing the amount of losses of the Bank from distressed assets;
- 4. structure a clear division of functions, responsibilities and powers in the management of distressed assets between the structural units involved and employees of the Bank, establishing a proper relationship between them, determining those responsible for proper interaction between the Bank's divisions at all organizational levels models of three lines of protection;
- 5. adequacy compliance of the process of problem assets management organized by the Bank with the level, volume, structure of problem assets in the Bank, dynamics of their changes, ensuring priority of the Bank's financial, time and human resources on assets with the highest value / exposure and risk of credit risk;
- 6. comprehensiveness and complexity the process of problem assets management is a complex system of interconnected processes that cover the full life cycle of PA and integrated with the corporate governance system and risk management system of the Bank;
- efficiency ensuring a reduction in the level (as a percentage of the corresponding amount of assets) and the amount of problem assets (in absolute terms) with the achievement of optimal balance between time and debt repayment on such assets / proceeds from sale / assignment of claims on such assets to the Distressed Assets Management Strategy;
- monitoring constant control over the achievement of goals and objectives set by the Distressed Assets Management Strategy and the Operational Plan for Implementation of the Distressed Assets Management Strategy, efficiency of actions of the Bank's divisions and employees, efficiency of the Bank's debt settlement and sale of foreclosed assets.

The Bank organises the process of problem assets management, which covers all organizational levels of the Bank, defines a clear division of functions, responsibilities and powers among all its entities, as well as their responsibilities in accordance with such distribution, ensures the order of their interaction and reporting.

The Bank's collective management bodies are informed of the monthly report on the analysis of the quality of the loan portfolio with a detailed analysis of the level of credit risk in the loan portfolio as a whole and in the areas of lending.

In addition, the Bank adheres to a system of internal concentration limits, which consists of targeted long-term strategies of the Bank in terms of the structure of individual segments of the loan portfolio and concentration limits set for individual sectors of the economy.

In order to prevent exceeding the concentration limits, these limits are subject to monitoring (control). The concentration limits are monitored monthly and quarterly by the Credit Risk Department. The results of the monitoring are subject to presentation as part of the management risk reporting to the Management Board of the Bank and the Supervisory Board.

In accordance with the requirements of IFRS 9, the Bank applies a model of expected losses, which provides for the timely reflection of the deterioration or improvement of the credit quality of financial instruments, taking into account available information and forecasts for the future. The amount of expected impairment recognised through the formation of an allowance for impairment depends on the amount of impairment (credit quality deterioration) from the date of initial recognition of the financial instrument.

The process of estimating the amount of expected losses under IFRS 9 consists of the following steps:

- 1. analysis of the level of credit risk for the presence of a significant increase in credit risk or the occurrence of a default event from the date of initial recognition and attribution to the appropriate stage of impairment;
- 2. calculation of the amount of expected credit losses (estimated allowance for impairment).

In order to assess the amount of expected losses the Bank uses 2 approaches:

- assessment of the amount of expected losses on an individual basis for individually significant active banking operations (in the amount of UAH 2,000 thousand or the equivalent in foreign currency according to the NBU exchange rate at the reporting date), for which default was recognized;
- assessment of the amount of expected losses on a group basis for individually insignificant active banking operations and individually significant active operations for which the fact of default is not detected.

For the purposes of assessing expected credit losses, financial instruments, in accordance with the requirements of IFRS 9, are classified into one of three stages of impairment, based on how significantly the level of credit risk for the financial instrument has changed as of the reporting date compared to the date of its initial recognition.

The levels of parameters of individual and group assessment of depreciation PD, LGD, CCF, are evaluated at least once a year, and in case of significant changes in economic conditions, the level of defaults and other crisis phenomena in the economy as a whole and in areas of economic activity, changes in the Bank's credit policy or regulatory documents on credit risk management of the Bank, the parameters are evaluated as of the date of assessment of impairment of credit operations.

Credit risk of off-balance sheet financial instruments is defined as the possibility of losses due to nonperformance of contractual obligations by the other party to the financial instrument. The Bank applies the same credit policy to contingent liabilities as it does to balance sheet financial instruments: approval procedures, risk control, and monitoring procedures are established.

To prevent critical losses due to credit risk, the Bank constantly monitors compliance with the regulatory values of credit risk established by the NBU.

As at December 31, 2021, the maximum amount of credit risk per counterparty (N7), which is defined as the ratio of the amount of all claims of the bank to the counterparty or group of related counterparties and all financial obligations provided by the bank in relation to the counterparty or group of related counterparties to the regulatory capital of the bank, was 9,03%, with a regulatory value of no more than 25% (the value of the standard as of December 31, 2020 was 7,42%).

As at December 31, 2021, the large credit risk ratio (N8), which is defined as the ratio of the sum of all large credit risks in relation to counterparties, groups of related counterparties, all persons associated with the bank to the regulatory capital of the bank, was 0.00%, with a standard value of no more than 800% (the standard value as of December 31,2020 was 0.00%).

Market risk. The Bank is exposed to market risks arising from open positions in: (a) currency, (b) interest rate and (c) equity instruments, all of which are largely dependent on general and specific market developments. Management Board sets acceptable risk limits and monitors adherence to the limits on a daily basis. However, this approach does not prevent losses outside the limits in the event of significant market developments.

Currency risk. Management sets currency risk limits and overall acceptable risk exposure for overnight and intra-day positions, with periodical control performed. The Bank is exposed to currency risks arising from open foreign currency positions. These positions are calculated as the differences between assets and liabilities in the same currency as at the reporting date. The Bank evaluates and monitors levels of long and short foreign currency open positions using hryvnia as a base currency. Open position limits are set at the level required by the NBU and calculated as open currency position of regulatory capital of the Bank. Compliance with these limits is monitored on a daily basis. Respective reports are submitted to Asset, Liability and Tariff Management Committee (ALTCO) on a weekly basis.

The Bank's currency risk exposure as at the reporting date is presented as follows:

31 December 2021				31 December 2020					
In thousands of hryvnias	Monetary financial assets	Monetary financial liabilities	Derivatives	Net position	Monetary financial assets	Monetary financial liabilities	Derivatives	Net position	
US Dollars	6 279 484	6 284 888	2 059	(3 345)	5 384 725	5 362 231	(2 528)	19 966	
EUR	3 064 184	3 053 915	(4 371)	5 898	2 889 189	2 885 900	-	3 289	
British pounds	28 602	29 435	` 737	(96)	22 931	20 519	(2 345)	67	
Russian roubles	6 142	6 050	-) 92	13 153	9 735	(3 472)	(54)	
Other	317 093	314 311	4 373	7 155	225 005	229 909	` 8 322	3 418	

The following table presents sensitivity analysis of profit or loss and equity to reasonably possible changes in exchange rates as at the reporting date applied to Bank's functional currency, with all other variables remaining constant:

	At 31 December 2021		At 31 Decem	nber 2020
-	Impact on	Impact on	Impact on	Impact
In thousands of hryvnias	profit or loss	equity	profit or loss	on equity
US dollar strengthening by 10% (2020: strengthening by 10%)	(274)	(334)	1 637	1 997
US dollar weakening by 10% (2020: weakening by 10%)	274	334	(1 637)	(1 997)
Euro strengthening by 10% (2020: strengthening by 10%)	484	590	270	329
Euro weakening by 10% (2020: weakening by 10%)	(484)	(590)	(270)	(329)
Russian rouble strengthening by 10% (2020: strengthening by 10%)	8	9	(4)	(5)
Russian rouble weakening by 10% (2020: weakening by 10%)	(8)	(9)	4	5
Other currencies strengthening by 10% (2020: strengthening by 10%)	579	706	286	349
Other currencies weakening by 10% (2020: weakening by 10%)	(579)	(706)	(286)	(349)

Interest rate risk. The Bank is exposed to interest rate risk arising from the effects of fluctuations in the prevailing market interest rates on its financial position and cash flows. Interest margins may increase as a result of such changes, however it may decrease or cause losses in case of unexpected fluctuations.

The vulnerability of the Bank's financial result to changes in interest rates is an indicator of the sensitivity of assets and liabilities to changes in interest rates in the long term. Sensitivity factors include assumptions about maturity and timing of interest rate changes and product updates. The table below shows the potential impact on the Bank's profit in the 12 m horizon, calculated using the NII method, in the event of an increase/decrease in interest rates on financial instruments denominated in major currencies:

		At 31 D	December 2021	At 31 December 2020		
_	Type of financial instrument rate	Rate change (b. p.)	Impact on profit or loss (thousands of hryvnias)	Rate change (b. p.)	Impact on profit or loss (thousands of hryvnias)	
UAH	 variable rate constant rate 	+200/-200 +200/-200	+122 908 / -122 908 -37 434 / +37 434	+200/-200 +200/-200	+117 116 / -117 116 -26 208 / +26 208	
USD	 variable rate constant rate 	+200/-200 +200/-200	+5 374 / -5 374 +18 201 / -18 201	+200/-200 +200/-200	+4 876 / -4 876 +127 / -127	
EUR	 variable rate constant rate 	+200/-200 +200/-200	+8 652 / -8 652 +29 726 / -29 726	+200/-200 +200/-200	+9 151 / -9 151 +26 515 / -26 515	

The Bank monitors interest rates on financial instruments. The table below summarises effective interest rates on interest bearing financial instruments as at the relevant reporting date:

	2021				2020			
% per annum	UAH	US Dollars	EUR	Other	UAH	US Dollars	EUR	Other
Assets								
Cash and funds in the National Bank								
of Ukraine								
- deposit certificates issued by the NBU	8%	-	-	-	6%	-	-	-
Due from other banks								
- guarantee deposits	0%	0%	0%	-	0%	0%	-	-
 interest bearing correspondent 	0%	0%	-1%	0%	0%	0%	-1%	0%
accounts with other banks	0 /0	0 /8	-1 /0	0 /0	0 /0	0 /6	-1 /0	0 /0
Loans and advances to customers								
- at fixed rate	20%	5%	5%	7%	22%	6%	5%	7%
- at variable rate	13%	4%	5%	-	16%	6%	6%	-
Securities at fair value through other	12%	4%	2%	-	13%	4%	_	_
comprehensive income	12/0	7/0	2 /0	_	1070	70	-	_
Securities at amortised cost	-	-	-	-	-	8%	-	-
Liabilities								
Due to other banks								
- at fixed rate	0%	0%	0%	0%	0%	0%	0%	0%
- at variable rate	9%	-	-	-	6%	-	0%	-
Due to other financial institutions								
- at fixed rate	-	-	-	-	-	-	-	-
- at variable rate	7%	-	-	-	6%	-	-	-
Customer accounts								
 current and settlement accounts 	2%	0%	0%	0%	0%	0%	0%	0%
- term deposits	8%	1%	0%	-	7%	1%	0%	-
Debt securities	9%	-	-	-	12%	-	-	-

"-" in the table above means that the Bank has no assets or liabilities denominated in the corresponding currency. Information presented in the table relates to fixed rates, unless stated otherwise.

Other price risk. The Bank is exposed to early repayment risk due to providing fixed rate loans, including mortgages, which allow a borrower to early repay its loan. The Bank's current year profit and equity as at the reporting date would not be significantly influenced by changes in early repayment rates, since such loans are carried at amortised cost, and loan amount at early repayment is equal or close to amortised cost of loans and advances to customers.

Geographical risk concentration. Geographical analysis of Bank's assets and liabilities as at 31 December 2021 is presented as follows:

In thousands of hryvnias	Ukraine	OECD	Non-OECD	Total
Assets				
Cash and funds in the National Bank of Ukraine	4 817 011	-	-	4 817 011
Due from other banks	69 934	2 206 102	3 405	2 279 441
Loans and advances to customers	16 802 548	14	1 380	16 803 942
Securities	7 814 347	-	-	7 814 347
Investments in subsidiaries	10 000	-	-	10 000
Other financial assets	142 001	7 098	25	149 124
Total financial assets	29 655 841	2 213 214	4 810	31 873 865
Non-financial assets	1 344 106	3 613	-	1 347 719
Total assets	30 999 947	2 216 827	4 810	33 221 584
Liabilities				
Due to other banks	3 575 961	136 122	-	3 712 083
Customer accounts	24 231 341	177 741	109 176	24 518 258
Due to other financial institutions	101 080	-	-	101 080
Debt securities	1 834	484 289	-	486 123
Other financial liabilities	233 503	21 289	11	254 803
Total financial liabilities	28 143 719	819 441	109 187	29 072 347
Non-financial liabilities	200 740	197	7	200 944
Total liabilities	28 344 459	819 638	109 194	29 273 291
Net position	2 655 488	1 397 189	(104 384)	3 948 293

Assets and liabilities have been classified based on counterparty's resident country. Cash on hand, property, leasehold improvements, and equipment have been classified based on the country of their physical presence.

Liabilities due to other banks, concentrated in OECD countries, include UAH 132 266 thousand of liabilities due to the parent bank (2020: UAH 91 210 thousand) (Note 36).

Geographical analysis of Bank's assets and liabilities as at 31 December 2020 is presented as follow:

In thousands of hryvnias	Ukraine	OECD	Non-OECD	Total
Assets				
Cash and funds in the National Bank of Ukraine	2 173 743	-	-	2 173 743
Due from other banks	51 140	1 994 008	13 357	2 058 505
Loans and advances to customers	13 281 317	574	138	13 282 029
Securities	6 187 229	-	-	6 187 229
Other financial assets	153 581	105	16	153 702
Total financial assets	21 847 010	1 994 687	13 511	23 855 208
Non-financial assets	1 359 511	13 411	-	1 372 922
Total assets	23 206 521	2 008 098	13 511	25 228 130
Liabilities				
Due to other banks	2 744 023	95 257	-	2 839 280
Customer accounts	18 056 490	199 759	63 516	18 319 765
Due to other financial institutions	115 580	-	-	115 580
Debt securities	18 463	366 347	-	384 810
Other financial liabilities	214 874	31 654	-	246 528
Total financial liabilities	21 149 430	693 017	63 516	21 905 963
Non-financial liabilities	200 367	211	7	200 585
Total liabilities	21 349 797	693 228	63 523	22 106 548
Net position	1 856 724	1 314 870	(50 012)	3 121 582

Liquidity risk. Liquidity risk is the risk that an entity will encounter difficulty in meeting obligations associated with financial liabilities. The Bank is exposed to daily calls on its available cash resources from overnight deposits, current accounts, maturing deposits, loan drawdowns, guarantees and from margin and other calls on cash-settled derivative instruments. The Bank does not maintain sufficient cash resources to meet all of these needs as experience shows that a minimum level of reinvestment of maturing funds can be predicted with a high level of certainty. Liquidity risk is managed by the Asset, Liability and Tariff Management Committee.

The Bank seeks to maintain a stable funding base primarily consisting of amounts due to banks, corporate and retail customer deposits, and debt securities. The Bank invests the funds in portfolios of liquid assets in order to be able to respond quickly and smoothly to unforeseen liquidity requirements.

The liquidity management of the Bank requires considering the level of liquid assets necessary to settle obligations as they fall due; maintaining access to a range of funding sources; maintaining funding contingency plans; and monitoring compliance of balance sheet liquidity ratios with regulatory requirements. The Bank calculates liquidity ratios on a daily basis in accordance with the NBU requirements. These ratios include:

- Short-term liquidity ratio (N6) calculated as liquid assets to liabilities with one year or less maturity ratio.
 As at 31 December 2021, the ratio was 74%, with the required ratio being not less than 60% (31 December 2020: 72%, with the required ratio being not less than 60%).
- Liquidity Coverage Ratio (LCR) in all currencies. As at 31 December 2021, LCR in all currencies was 132%, with the required ratio being not less than 100% (31 December 2020: 142% with the required ratio being not less than 100%).
- Liquidity Coverage Ratio (LCR) in foreign currencies or LCR_{IB}. As at 31 December 2021, LCR in foreign currencies was 117% with the required ratio being not less than 100% (31 December 2020: 112% at the minimum value 100%).
- Net stable financing ratio NSFR. As at 31 December 2021 this indicator was 117%, with the required ratio being not less than 90% (31 December 2020: this indicator was calculated in Test mode).

The Treasury Department receives information on liquidity profile of financial assets and liabilities. The Treasury Department ensures availability of adequate portfolio of short-term liquid assets, largely made up of liquid securities, deposits with banks, and other inter-bank facilities, to maintain sufficient liquidity.

The tables below show Bank's liabilities by remaining contractual maturity. The amounts disclosed represent contractual undiscounted cash flows, including total credit related commitments and commitments to extend financial guarantees. Such undiscounted cash flows differ from the amounts reported in the separate statement of financial position, since the amounts in the separate statement of financial position are based on discounted cash flows. If the amount payable is not fixed, the amount disclosed is determined by reference to terms and conditions as at the end of the reporting period. Foreign currency payments are translated using the spot exchange rate as at the reporting date.

The analysis of undiscounted cash flows for financial liabilities as at 31 December 2021 is presented as follows:

In thousands of hryvnias	Demand and less than 1 month	1-12 months	From 12 months to 5 years	Over 5 years	Total
Liabilities					
Due to other banks	738 397	388 767	3 632 353	-	4 759 517
Customer accounts	18 414 567	5 794 695	458 297	19 342	24 686 901
Loans from international and other institutions	1 930	9 122	103 213	-	114 265
Debt securities	2 825	498 712	-	-	501 537
Financial lease liabilities	195	19 798	87 352	27 766	135 111
Other financial liabilities	119 693	-	-	-	119 693
Credit related commitments	4 512 658	-	-	-	4 512 658
Spot and forward contracts					
- inflows	(7 909)	-	-	-	(7 909)
- outflows	7 903	-	-	-	7 903
Total potential future payments for financial obligations	23 790 259	6 711 094	4 281 215	47 108	34 829 676

Liquidity requirements to support calls under guarantees and letters of credit are considerably less than the amount of relevant liabilities and commitments disclosed in the above maturity analysis, as the Bank does not generally expect the third party to draw funds under such agreements.

The analysis of undiscounted cash flows for financial liabilities as at 31 December 2020 is presented as follows:

In thousands of hryvnias	Demand and less than 1 month	1-12 months	From 12 months to 5 years	Over 5 years	Total
Liabilities					
Due to other banks	551 001	126 387	2 805 907	-	3 483 295
Customer accounts	13 712 824	4 324 995	393 741	28 043	18 459 603
Loans from international and other institutions	2 161	104 311	-	-	106 472
Debt securities	5 459	409 365	-	-	414 824
Financial lease liabilities	220	16 233	70 554	36 706	123 713
Other financial liabilities	122 816	-	-	-	122 816
Credit related commitments	3 905 948	-	-	-	3 905 948
Spot and forward contracts					
- inflows	(14 155)	-	-	-	(14 155)
- outflows	14 178	-	-	-	14 178
Total potential future payments for financial obligations	18 300 452	4 981 291	3 270 202	64 749	26 616 694

Customer accounts are classified based on remaining contractual maturities in the above analysis. However, in accordance with the Civil Code of Ukraine, for deposit agreements concluded prior to 6 June 2015, individuals have the right to withdraw their deposits prior to maturity, with their right to accrued interest forfeited. Some corporate deposit contracts envisage a possibility of early withdrawn. Certain deposit contracts with individuals concluded after 6 June 2015 also envisage early withdrawals.

As at 31 December 2021 and 2020 undiscounted cash flows for deposits with early withdrawal option in distribution by maturity buckets are as follows:

In thousands of hryvnias	Demand and less than 1 month	1-12 months	From 12 months to 5 years	Over 5 years	Total
At 31 December 2021	50 432	732 745	1 535 559	11 687	2 330 423
At 31 December 2020	667 209	1 750 365	112 063	25 066	2 554 703

31 Financial risk management (continued)

The Bank monitors the following contractual maturities as at 31 December 2021 and 31 December 2020:

In thousands of hryvnias	Demand and less than 1 month	1-12 months	From 12 months to 5 years	Over 5 years	Total
At 31 December 2021					
Financial assets	8 632 430	10 516 725	10 368 804	2 345 906	31 863 865
Financial liabilities	(19 222 624)	(6 167 987)	(3 634 859)	(46 877)	(29 072 347)
Net liquidity gap based on expected maturities	(10 590 194)	4 348 738	6 733 945	2 299 029	2 791 518
Spot and forward contracts					
- inflows	7 903	-	-	-	7 903
- outflows	(7 909)	-	-	-	(7 909)
At 31 December 2020					
Financial assets	5 325 862	8 575 904	8 536 103	1 417 339	23 855 208
Financial liabilities	(14 354 592)	(4 737 850)	(2 752 037)	(61 484)	(21 905 963)
Net liquidity gap based on expected maturities	(9 028 730)	3 838 054	5 784 066	1 355 855	1 949 245
Spot and forward contracts					
- inflows	14 155	-	-	-	14 155
- outflows	(14 178)	-	-	-	(14 178)

The matching and/or controlled mismatching of the maturities and interest rates of assets and liabilities is critical to management. It is unusual for banks ever to be completely matched since business transacted is often of an uncertain term and of different types. An unmatched position potentially enhances profitability but can also increase the risk of losses. The maturities of assets and liabilities and the ability to replace, at an acceptable cost, interest-bearing liabilities as they mature, are important factors in assessing the liquidity of the Bank and its response to changes in interest and exchange rates.

Management believes that in spite of a substantial portion of customer accounts being on demand, diversification of these deposits by a number and type of depositors, and the past experience of the Bank would indicate that these customer accounts provide a long-term and stable source of financing for the Bank.

The Bank has open credit line with its Parent company PKO Bank Polski SA for USD 30 and 47 million. Bank may regularly use this credit line for the replenishment of working capital and maintenance of the operational liquidity.

32 Capital management

The Bank's objectives when managing capital are (i) to comply with the capital requirements set by the by the National Bank of Ukraine , (ii) to safeguard the Bank's ability to continue as a going concern. In the opinion of management, the total amount of capital managed by the Bank is equal to the amount of capital represented in the separate statement of financial position. The amount of capital managed by the Bank as at 31 December 2021 is UAH 3 948 293 thousand (as at 31 December 2020 - UAH 3 121 582 thousand). Compliance with capital adequacy of the Bank, the National Bank of Ukraine carried out each decade. Other objectives of capital management are evaluated annually.

Ukrainian legislation requires that banks form a reserve to cover unforeseen losses on all asset items and offbalance sheet liabilities. The reserve must represent 25% of bank's regulatory capital but not less than 25% of bank's registered share capital. The reserve is formed through charges from net profit for the reporting year retained by the Bank after taxes and retained earnings for previous years.

32 Capital management (continued)

Charges to the reserve must be no less than 5% of bank's profit until the reserve reaches 25% of bank's regulatory capital.

Should a bank's operations pose a threat to interests of depositors and other bank's creditors, the National Bank of Ukraine has the right to require increase in the reserve and annual charges thereto. If, as a result of bank's operations, regulatory capital is reduced to an amount lower than share capital, annual charges to the reserve must be 10% of bank's net profit until the reserve reaches 35% of bank's share capital.

The reserve may only be used to cover the bank's losses for the reporting year in accordance with the decision of the bank's board (Supervisory board) and in accordance with the procedure established by the general meeting of its shareholders. Furthermore, effective Ukrainian legislation envisages no restrictions on distribution of the reserve among bank's shareholders upon bank's liquidation after satisfaction of all creditors' claims.

As at 31 December 2021 the Bank's reserve fund amounts to UAH 680 551 thousand (31 December 2020: UAH 185 180 thousand)

Under the current capital requirements set by the National Bank of Ukraine, banks have to maintain a ratio of regulatory capital to risk weighted assets ("statutory capital ratio") above a prescribed minimum level. The table below presents regulatory capital based on the Bank's reports prepared under the NBU requirements, which comprises the following components:

In thousands of hryvnias	2021	2020
Primary capital	2 703 297	2 176 847
Additional capital	548 782	108 009
Diversion	(10 010)	(10)
Total regulatory capital	3 242 069	2 284 846

As at 31 December 2021 and 31 December 2020, the Bank complied with the requirements regarding the minimum regulatory capital adequacy ratio (H2), which should be at least 10%. The value of the H2 normative as at 31 December 2021 is 15% (31 December 2020: 16%).

During 2021 and 2020 the Bank adhered to all economic standards and open currency position limits set by the NBU.

The NBU performs stress testing on a regular basis to check compliance with the regulatory requirements under certain stress test assumptions. If results of the stress test show that required capital adequacy could fall below the required level in the future, the NBU might require an increase of regulatory capital above the minimum regulatory requirements.

33 Contingencies and commitments

Legal proceedings. From time to time and in the normal course of business, claims against the Bank may be received. On the basis of its own estimates and both internal and external professional advice management is of the opinion that no material losses will be incurred in respect of claims. The total amount of provision for litigation is UAH 12 094 thousand as at 31 December 2021 (31 December 2020: UAH 8 117 thousand).

Changes in provisions for potential liabilities are:

In thousands of hryvnias	Note	2021	2020
Commitment provision at 1 January	20	8 117	7 998
Provision added during the year		6 172	1 348
Amounts utilized during the year		(2 064)	(1 654)
Effect of exchange rate of foreign currency		(131)	¥25
Commitment provision at 31 December	20	12 094	8 117

Tax legislation. The Ukrainian tax system can be characterized by numerous taxes and frequently changing legislation which may be applied retroactively, open to wide interpretation and in some cases are conflicting. Instances of inconsistent opinions between local, regional, and national tax authorities and between the Ministry of Finance and other state authorities are not unusual. Tax declarations are subject to review and investigation by a number of authorities that are enacted by law to impose severe fines, penalties and interest charges. A tax year remains open for review by the tax authorities during the three subsequent calendar years, however under certain circumstances a tax year may remain open longer.

These facts create tax risks substantially more significant than typically found in countries with more developed systems. Management believes that it has adequately provided for tax liabilities based on its interpretation of tax legislation, official pronouncements and court decisions. However, the interpretations of the relevant authorities could differ and the effect on these separate financial statements, if the authorities were successful in enforcing their interpretations, could be significant.

Management believes that it has complied with all existing tax legislation. However, there can be no assurance that the tax authorities will not have a different interpretation of the Bank's compliance with existing legislation and assess fines and penalties. No provision for potential tax assessment has been made in these separate financial statements.

Capital expenditure commitments.

At 31 December 2021, the Bank had contractual capital expenditure commitments in respect of property, plant and equipment totalling UAH 3 803 thousand (31 December 2020: UAH 5 966 thousand) and in respect of intangible assets in the amount of UAH 9 045 thousand (31 December 2020: UAH 1 337 thousand).

The Bank has already allocated the necessary resources in respect of these commitments. The Bank's management believes that future net income and funding will be sufficient to cover these and any similar commitments.

Credit related commitments. The primary purpose of these instruments is to ensure that funds are available to customers as required. Guarantees and standby letters of credit, which represent irrevocable assurances that the Bank will make payments in the event that a customer cannot meet its obligations to third parties, carry the same credit risk as loans. Documentary and commercial letters of credit, which are written undertakings by the Bank on behalf of a customer authorising a third party to draw drafts on the Bank up to a stipulated amount under specific terms and conditions, are collateralised by the underlying shipments of goods to which they relate or cash deposits and therefore carry less risk than a direct borrowing.

Commitments to extend credit represent unused portions of authorisations to extend credit in the form of loans, guarantees or letters of credit. With respect to credit risk on commitments to extend credit, the Bank is potentially exposed to loss in an amount equal to the total unused commitments, if the unused amounts were to be drawn down. However, the likely amount of loss is less than the total unused commitments since most commitments to extend credit are contingent upon customers maintaining specific credit standards. The Bank monitors the term to maturity of credit related commitments because longer-term commitments generally have a greater degree of credit risk than shorter-term commitments.

33 Contingencies and commitments (continued)

As at 31 December 2021, all commitments to extend credits are revocable and amount to UAH 4 178 850 thousand (31 December 2020: UAH 3 528 462 thousand).

Credit related commitments were as follows:

In thousands of hryvnias	At 31 December 2021						
	Stage 1	Stage 2	Stage 3	Total			
Financial guarantee contracts and letters of credit	309 411	24 398	-	333 809			
Loss allowances for expected credit losses	298	16	-	314			
Carrying value (provision)	298	16	-	314			

In thousands of hryvnias	At 31 December 2020						
	Stage 1	Stage 2	Stage 3	Total			
Financial guarantee contracts and letters of credit	377 488	-	-	377 488			
Loss allowances for expected credit losses	888	-	-	888			
Carrying value (provision)	888	-	-	888			

As at 31 December 2021, commitments under guarantees and letters of credit were secured with deposits in the amount of UAH 39 933 thousand (as at 31 December 2020 - UAH 161 330 thousand) (Note 16).

The total outstanding contractual commitments to extend credit, import letters of credit, and guarantees do not necessarily represent future cash requirements, as these financial instruments may expire or terminate without being funded.

Changes in expected credit losses estimates under credit-related loan commitments are presented as follows:

In thousands of hryvnias	Note	Stage 1	Stage 2	Stage 3	Total
Balance at 1 January 2021		27 382	297	1 444	29 123
Transfer to Stage 1		343	(332)	(11)	-
Transfer to Stage 2		(315)	357	(42)	-
Transfer to Stage 3		(37)	(279)	316	-
Net remeasurement of loss allowance	25	(36 629)	921	2 399	(33 309)
New loan commitments and financial guarantees issued	25	31 703	151	262	32 116
Loan commitments and financial guarantee contracts that have been derecognised	25	(4 682)	(156)	(743)	(5 581)
Foreign exchange and other movements		(461)	-	(17)	(478)
Balance at 31 December 2021		17 304	959	3 608	21 871

In thousands of hryvnias	Note	Stage 1	Stage 2	Stage 3	Total
Balance at 1 January 2020		14 781	72	278	15 131
Transfer to Stage 1		126	(125)	(1)	-
Transfer to Stage 2		(326)	327	(1)	-
Transfer to Stage 3		(4)	(109)	113	-
Net remeasurement of loss allowance	25	(10 577)	149	1 396	(9 032)
New loan commitments and financial guarantees issued	25	28 672	-	60	28 732
Loan commitments and financial guarantee contracts that have been derecognised	25	(6 530)	(25)	(418)	(6 973)
Foreign exchange and other movements		1 240	8	17	1 265
Balance at 31 December 2020		27 382	297	1 444	29 123

34 Fair value disclosures

Fair value measurements are analysed by level in the fair value hierarchy as follows: (i) level one are measurements at quoted prices (unadjusted) in active markets for identical assets or liabilities, (ii) level two measurements are valuations techniques with all material inputs observable for the asset or liability, either directly (that is, as prices) or indirectly (that is, derived from prices), and (iii) level three measurements are valuations not based on observable market data (that is, unobservable inputs). Management applies judgement in categorising financial instruments using the fair value hierarchy. If a fair value measurement uses observable inputs that require significant adjustment, that measurement is a Level 3 measurement. The significance of a valuation input is assessed against the fair value measurement in its entirety.

(a) Recurring fair value measurements

Recurring fair value measurements are those that IFRS require or permit in the separate statement of financial position at the end of each reporting period. The level in the fair value hierarchy into which the recurring fair value measurements are categorised are as follow:

		2021			2020			
In thousands of hryvnias	Level 1	Level 2	Level 3	Total	Level 1	Level 2	Level 3	Total
Assets at fair value								
Financial assets								
Securities at fair value								
through other								
comprehensive income								
- Ukrainian government bonds	7 814 337	-	-	7 814 337	5 897 526	-	-	5 897 526
- Corporate shares	-	-	10	10	-	-	10	10
Non-financial assets								
- Property	-	-	334 680	334 680	-	-	312 457	312 457
- Investment properties	-	-	11 771	11 771	-	-	14 054	14 054
Total assets recurring fair value measurements	7 814 337	-	346 461	8 160 798	5 897 526	-	326 521	6 224 047

b) Assets and liabilities not measured at fair value but for which fair value is disclosed

Fair values analysed by level in the fair value hierarchy and carrying value of assets not measured at fair value are as follows:

In thousands of hryvnias		2021					
	Level 1	Level 2	Level 3	Total	Carrying value		
Assets							
Cash and funds in the National Bank of Ukraine	4 817 011	-	-	4 817 011	4 817 011		
Due from other banks	-	2 279 441	-	2 279 441	2 279 441		
Loans and advances to customers	-	-	16 668 738	16 668 738	16 803 942		
- Corporate loans	-	-	8 781 919	8 781 919	8 933 836		
- Loans to individuals - consumer loans	-	-	1 637 045	1 637 045	1 493 719		
- Loans to individuals - mortgage loans	-	-	2 763 290	2 763 290	2 889 606		
- Loans to individuals - car loans	-	-	3 486 484	3 486 484	3 486 781		
Securities at amortised cost	-	-	-	-	-		
Other financial assets	-	-	149 124	149 124	149 124		
Total	4 817 011	2 279 441	16 817 862	23 914 314	24 049 518		

34 Fair value disclosures (continued)

		2020					
In thousands of hryvnias	Level 1	Level 2	Level 3	Total	Carrying value		
Assets	2 173 743	-	-	2 173 743	2 173 743		
Cash and funds in the National Bank of Ukraine	-	2 058 505	-	2 058 505	2 058 505		
Due from other banks	-	-	13 214 791	13 214 791	13 282 029		
Loans and advances to customers	-	-	7 198 889	7 198 889	7 357 355		
- Corporate loans	-	-	1 453 863	1 453 863	1 346 942		
- Loans to individuals - consumer loans	-	-	1 779 106	1 779 106	1 781 942		
 Loans to individuals - mortgage loans 	-	-	2 782 933	2 782 933	2 795 790		
- Loans to individuals - car loans	293 819	-	-	293 819	289 693		
Securities at amortised cost	-	-	153 702	153 702	153 702		
Total	2 467 562	2 058 505	13 368 493	17 894 560	17 957 672		

Fair values analysed by level in the fair value hierarchy and carrying amount of liabilities not measured at fair value are as follows:

In thousands of hryvnias	Level 1	Level 2	Level 3	Total	Carrying value
Liabilities					
Due to other banks	-	3 615 647	-	3 615 647	3 712 083
 Correspondent accounts of other banks 	-	712 083	-	712 083	712 083
- Term placements and loans of other banks	-	2 903 564	-	2 903 564	3 000 000
Customer accounts	-	24 504 520	-	24 504 520	24 518 258
- Current/settlement accounts of legal entities	-	11 557 569	-	11 557 569	11 557 569
- Term deposits of legal entities	-	2 809 289	-	2 809 289	2 815 043
- Current/demand accounts of individuals	-	5 526 852	-	5 526 852	5 526 852
- Term deposits of individuals	-	4 610 810	-	4 610 810	4 618 794
Due to other financial institutions	-	97 256	-	97 256	101 080
Other financial liabilities	-	254 803	-	254 803	254 803
Debt securities	-	500 644	-	500 644	486 123
Total	-	28 972 870	-	28 972 870	29 072 347

In thousands of hryvnias	Level 1	Level 2	Level 3	Total	Carrying value
Liabilities					
Due to other banks	-	2 764 234	-	2 764 234	2 839 280
- Correspondent accounts of other banks	-	539 280	-	539 280	539 280
- Term placements and loans of other banks	-	2 224 954	-	2 224 954	2 300 000
Customer accounts	-	18 489 077	-	18 489 077	18 319 765
- Current/settlement accounts of legal entities	-	8 132 064	-	8 132 064	8 132 064
- Term deposits of legal entities	-	2 439 436	-	2 439 436	2 448 576
- Current/demand accounts of individuals	-	3 676 230	-	3 676 230	3 676 230
- Term deposits of individuals	-	4 241 347	-	4 241 347	4 062 895
Due to other financial institutions	-	115 580	-	115 580	115 580
Other financial liabilities	-	246 528	-	246 528	246 528
Debt securities	-	401 667	-	401 667	384 810
Total	-	22 017 086	-	22 017 086	21 905 963

The fair values in level 2 and level 3 of fair value hierarchy were estimated using the discounted cash flows valuation technique. The fair value of floating rate instruments that are not quoted in an active market was estimated to be equal to their carrying amount. The fair value of unquoted fixed interest rate instruments was estimated based on estimated future cash flows expected to be received discounted at current weighted average interest rate for existing instruments with similar remaining maturity.

34 Fair value disclosures (continued)

For assets, the Bank used assumptions about counterparty's incremental borrowing rate and prepayment rates. Liabilities were discounted at the Bank's own incremental borrowing rate. Liabilities due on demand were discounted from the first date that the amount could be required to be paid by the Bank.

The table below presents the potential impact on the Bank's profit on FVOCI-valued securities:

	At 31 D	ecember 2021	At 31 December 2020			
	Rate change (b. p.)	Impact on profit or loss (thousands of hryvnias)	Rate change (b. p.)	Impact on profit or loss (thousands of hryvnias)		
UAH	+100/-100	-30 986 / +31 691	+100/-100	-35 203 / +34 276		
USD	+100/-100	- 39 155 / +39 892	+100/-100	- 21 397 / +21 073		
EUR	+100/-100	-1 217 / +1 232	+100/-100	-		

35 Presentation of financial instruments by measurement categories

The procedure for classifying financial instruments is described in Note 3.

The following table provides a reconciliation of financial assets with these measurement categories as at 31 December 2021:

In thousands of hryvnias	Financial instruments measured at amortised cost	Financial instruments at fair value through other comprehensive income	Finance lease receivables	Total
Assets				
Cash and funds in the National Bank of Ukraine	4 817 011	-	-	4 817 011
Due from other banks				
- Correspondent accounts with other banks	2 265 155	-	-	2 265 155
- Guarantee deposits	14 286	-	-	14 286
Loans and advances to customers				
- Corporate loans	7 891 588	-	1 042 248	8 933 836
 Loans to individuals - car loans 	3 462 763	-	24 018	3 486 781
- Loans to individuals - other consumer loans	1 493 719	-	-	1 493 719
- Loans to individuals – mortgage loans	2 889 606	-	-	2 889 606
Securities	-	7 814 347	-	7 814 347
Other financial assets	149 124	-	-	149 124
Total financial assets	22 983 252	7 814 347	1 066 266	31 863 865

The following table provides a reconciliation of financial assets with these measurement categories as at 31 December 2020:

In thousands of hryvnias	Financial instruments measured at amortised cost	Financial instruments at fair value through other comprehensive income	Finance lease receivables	Total
Assets		income		
Cash and funds in the National Bank of Ukraine	2 173 743	-	-	2 173 743
<i>Due from other banks</i> - Correspondent accounts with other banks	2 027 741	-	-	2 027 741
- Guarantee deposits	30 764	-	-	30 764
Loans and advances to customers				
- Corporate loans	6 316 025	-	1 041 330	7 357 355
- Loans to individuals - car loans	2 781 773	-	14 017	2 795 790
 Loans to individuals - other consumer loans 	1 346 942	-	-	1 346 942
 Loans to individuals – mortgage loans 	1 781 942	-	-	1 781 942
Securities	289 693	5 897 536	-	6 187 229
Other financial assets	153 702	-	-	153 702
Total financial assets	16 902 325	5 897 536	1 055 347	23 855 208

As at 31 December 2021 and 31 December 2020, all of the Bank's financial liabilities were carried at amortised cost. Derivatives belong to the fair value through profit or loss measurement category.

36 Related party transactions

Parties are generally considered to be related if the parties are under common control or one party has the ability to control the other party or can exercise significant influence over the other party in making financial or operational decisions. In considering each possible related party relationship, attention is directed to the substance of the relationship, not merely the legal form.

As at 31 December 2021, the outstanding balances with related parties were as follows:

In thousands of hryvnias	Parent company	Entities under common control	Subsidiary	Key management personnel
Correspondent accounts with other banks (interest rate: 0%)	192 559	-	-	-
Gross amount of loans and advances to customers	-	-	-	494
Loss allowances for expected credit losses	-	-	-	(7)
Investments in subsidiaries	-	-	10 000	-
Other assets	2 586	-	-	4
Correspondent accounts and overnight placements of other banks (interest rate: 0%)	132 266	-	-	-
Customer accounts (interest rates for deposits: 1,2- 8%, for current accounts: 0-6%)	-	30 803	9 638	2 718
Other liabilities	53	-	-	21 923

The income and expense items on transactions with related parties for 2021 were as:

In thousands of hryvnias	Parent company	Entities under common control	Subsidiary	Key management personnel
Interest income	-	-	-	82
Interest expense	(11 183)	(2 198)	(183)	(21)
Other income	-	-	12	-
Loss allowances for expected credit losses	-	-	-	9
Fee and commission income	-	158	5	15
Fee and commission expense	(8 440)	-	-	(1)
Other expenses	-	(878)	-	-

As at 31 December 2021, other rights and obligations with related parties were as follows:

In thousands of hryvnias	Parent company	Entities under common control	Subsidiary	Key management personnel
Loan commitments received	2 107 149	-	-	-
Other commitments granted	8 432	-	-	586
Other rights received	7 909	-	-	-
Guarantees and collateral received	535	-	-	1 044

Loan commitments received relate to the undrawn borrowing facilities received from the Parent Bank PKO Bank Polski S.A. denominated in USD.

Total amounts of loans granted to related parties and repaid by them in 2021 are presented below:

In thousands of hryvnias	Parent company	Entities under common control	Subsidiary	Key management personnel
Amounts lent to related parties during the year	-	-	-	946
Amounts repaid by related parties during the year	-	-	-	(1 196)

36 Related party transactions (continued)

As at 31 December 2020, the outstanding balances with related parties were as follows:

In thousands of hryvnias	Parent company	Entities under common control	Subsidiary	Key management personnel
Correspondent accounts with other banks (interest rate: 0%)	123 787	-	-	-
Gross amount of loans and advances to customers	13 994	-	-	-
Loss allowances for expected credit losses	-	-	-	1 226
Investments in subsidiaries	-	-	-	(27)
Other assets	4 152	-	-	2
Correspondent accounts and overnight placements of other banks (interest rate: 0%)	91 210	-	-	-
Customer accounts (interest rates for deposits: 0.5- 11.5%, for current accounts: 0-4%)	-	29 402	8 912	25 367
Other liabilities	67	504	-	12 060

The income and expense items on transactions with related parties for 2020 were as:

In thousands of hryvnias	Parent company	Entities under common control	Subsidiary	Key management personnel
Interest income	-	-	-	94
Interest expense	(10 512)	(3 485)	(447)	(2 397)
Other income	-	-	-	1
Loss allowances for expected credit losses	-	-	-	(10)
Fee and commission income	1	147	10	137
Fee and commission expense	(598)	-	-	(2)
Other expenses	(877)	(1 081)	-	-

As at 31 December 2020, other rights and obligations with related parties were as follows:

In thousands of hryvnias	Parent company	Entities under common control	Subsidia ry	Key management personnel
Loan commitments received	2 184 779	-	-	-
Other commitments granted	17 976	-	-	1 010
Other rights received	14 178	-	-	-
Guarantees and collateral received	3 821	-	-	2 342

Loan commitments received relate to the undrawn borrowing facilities received from the Parent Bank PKO Bank Polski S.A. denominated in USD.

Total amounts of loans granted to related parties and repaid by them in 2020 are presented below:

In thousands of hryvnias	Parent company	Entities under common control	Subsidia		Key management personnel
Amounts lent to related parties during the year		-	-	-	2 236
Amounts repaid by related parties during the year		-	-	-	(1 268)

36 Related party transactions (continued)

Key management personnel amounts are presented below:

	2021	31 December 2021	2020	31 December 2020
In thousands of hryvnias	Expense	Accrued liability	Expense	Accrued liability
Short-term benefits:				
- Salaries	30 359	1 140	35 569	1 290
Social insurance contributions Other long-term employee benefits:	1 890	131	1 632	115
- Bonus payments	-	20 651	-	10 651
Total	32 249	21 922	37 201	12 056

Short-term benefits fall due wholly within twelve months after the end of the period in which management rendered related services. Other long-term payments include payments that are not expected to be fully settled within twelve months of the end of the period in which management provided the relevant services.

37 Subsequent events

On February 22, 2022, Russian President Vladimir Putin said that Russia recognises the independence of the regions in eastern Ukraine – the DNR and LNR. This led to the first package of economic sanctions imposed by the international community.

On February 24, 2022, at approximately 03:00 UTC (05:00 Kiev time, UTC+2), Russian President Vladimir Putin announced in a pre-recorded television broadcast that he had ordered a "special military operation" in eastern Ukraine. Minutes later, missile strikes hit dozens of cities across the country, including Kyiv, the capital of Ukraine. Soon, the Ukrainian border guard service announced that its border posts with Russia and Belarus were shelled. Russian troops launched an invasion of Ukraine from Russia, Belarus, Crimea, and eastern Ukraine. President of Ukraine Volodymyr Zelensky immediately declared martial law.

On February 25, 2022, President Volodymyr Zelensky ordered the full mobilization of the Ukrainian military for 90 days. He said that all Ukrainian men aged 18 to 60 are prohibited from traveling outside the country.

During the first two weeks, the Russian occupation forces focused their offensive on the directions of Kyiv, Kharkiv, Chernihiv, Mykolaiv, Odessa, and Mariupol, but were never able to capture these cities. Having suffered an actual defeat on the battlefield, the Russian occupation forces began to destroy the infrastructure of Ukraine, including medical and educational institutions. The international community classified such actions as war crimes.

The war in Ukraine has led to tragic loss of life and suffering. Although further prospects are completely uncertain, the economic consequences are already very serious: the number of refugees exceeds 2.5 million, in addition, there are large-scale destruction of key infrastructure in Ukraine. As a result of military operations, half of Ukrainian enterprises and business entities have temporarily or completely stopped their activities.

The NBU postponed making a decision on changing the discount rate. In the context of large-scale armed aggression and forced introduction of administrative restrictions, market monetary instruments, including the discount rate, do not significantly affect the functioning of the monetary and foreign exchange markets. The National Bank remains committed to the inflation targeting regime.

The foreign exchange market is now operating under significant restrictions that were introduced under martial law. Authorized institutions are actually prohibited from trading in currency values, except in a number of cases. Most transactions on the interbank market take place with the participation of the National Bank – both for the purchase and sale of foreign currency. Since the beginning of the war, the hryvnia exchange rate has been fixed at the level of February 24, 2022. what the exchange rate will be after the end of the war will depend on many parameters, so it is impossible to predict the exchange rate now. It is expected that after the situation normalizes, the full operation of the foreign exchange market will be restored as soon as possible, and currency restrictions imposed during the war period will be lifted. As soon as the market monetary instruments start working, the NBU will be able to return to smoothing exchange rate fluctuations and stabilizing the market situation in case of imbalances. For this purpose, the NBU has a sufficient reserve of international reserves – 27.7 billions of March 7, 2022.

37 Subsequent events (continued)

On March 8, 2022, the World Bank decided to allocate an additional 723 million to Ukraine to "get out of the economic emergency." In particular, the WB Board of executive directors approved a free package of additional budget support for Ukraine for 489 million. This includes a 350 million loan from the International Bank for reconstruction and development, 80 million in guarantees from the Netherlands, and 50 million from Sweden.

The World Bank is preparing another 3 billion aid package for Ukraine, which will be provided in the coming months, as well as additional support to neighboring countries hosting Ukrainian refugees.

Ukraine will also receive grant funding for USD 134 million. Of these, USD 100 million is from the UK, USD 22 million is from Denmark, and another USD 12 million is from Latvia, Lithuania, and Iceland. In addition, Japan will add 100 million in parallel funding to the support package.

On March 9, 2022, the IMF Executive Board approved the payment of USD 1.4 billion (SDR 1,005.9 million) under the rapid financing tool (RFI) to help Ukraine meet urgent financing needs and mitigate the economic consequences of the war," the document says.

The armed aggression of the Russian Federation and the Russian-Ukrainian war have extremely significant negative consequences for the financial system and banking sector, the scale of which continues to increase. Military operations and massive shelling covered territories that accounted for more than 50% of Ukraine's GDP. Many businesses in these territories had to stop working. Transport and logistics relations between the regions were disrupted, infrastructure was significantly damaged, and many Ukrainian citizens were affected. All this will have long-term consequences for the Ukrainian economy and its banking sector.

The foreign exchange market operates under significant restrictions that were introduced under martial law, and banks are actually prohibited from trading currency values, except in a number of cases. At the same time, the NBU simplified the requirements for the current operation of banks and refused to introduce new regulatory requirements. Regular sustainability assessments have been canceled, capital requirements for market risk have been postponed, and capital buffers will not be activated.

The impact of the war on the banking sector is manifested through such components as:

- interruptions in the operation of bank branches and ATMs, significant damage or destruction of banking infrastructure in war zones;
- reduced liquidity due to the outflow of client funds, which is partially offset by NBU support through refinancing instruments;
- reduction of the loan portfolio due to the actual termination of new lending by banks (except for lending by state-owned banks to sectors and enterprises that are critically important under martial law);
- a sharp (at least 50%) decrease in banks operating income (due to reduced demand for services from customers, introduced 'credit holidays', restrictions on currency transactions, etc.), which may result in their operating unprofitability in the medium term;
- inability of some borrowers to service loans, deterioration of payment discipline due to the termination of many enterprises, loss of sources of income by individuals (in particular, refugees), forced change of place of residence of millions of Ukrainian citizens;
- decrease in the amount of capital of banks due to shortfall in income, material losses and loss of part of the loan portfolio.

The unpredictability of scenarios for further deployment of military operations does not allow us to accurately assess how much of customers will be able to return to normal loan servicing and in what time horizon. However, even in an optimistic scenario, losses for banks will be significant.

Taking into account the situation, the Management conducts daily operational monitoring of the Bank's activities and ensures rapid response to incidents and changes in the situation. Also, when assessing possible scenarios for the development of events and based on the territorial location of the Bank's Assets, Management assesses possible losses as lower than the industry average and such that they will not affect the Bank's ability to continue operating on a continuous basis.

In terms of the impact on the quality of the loan portfolio, the Bank evaluates potential losses. Information is currently limited and it is not possible to conduct a more detailed assessment. However, according to the available official information about the fighting on the territory of Ukraine, part of the Bank's loan portfolio (about 20%) is located directly in the regions where active military operations are taking place, or are close to them.

37 Subsequent events (continued)

According to the current state, the potential impact of reserve contributions on expected credit risk losses is estimated at about UAH 350 million.

Due to the downgrade of the rating of Ukraine, the Bank charges the necessary reserves and conducts a credit risk assessment in accordance with the requirements of the NBU. The impact of the downgrade, in the Bank's assessment, provides for an increase in reserves on the portfolio of government bonds in the amount of about UAH 50 million, and the impact on credit risk of about UAH 300 million.

The Bank does not predict significant losses for other types of assets.

The potential impact on the regulatory capital adequacy ratio of N2 is estimated at about 1.2%, and given the current level of 14%, such an impact does not pose a threat of violation of the regulatory level of 10%. Also, the Bank's Management does not see any threats of violation of other prudential ratios of the banking system.



FREE TRANSLATION FROM THE UKRAINIAN ORIGINAL

INDEPENDENT AUDITOR'S REPORT

To the Shareholders and Supervisory Board of KREDOBANK, JSC

Report on the Audit of the Separate Financial Statements

Opinion

We have conducted audit of separate financial statements of KREDOBANK (the Bank), which comprise The separate statement of financial position as at December 31, 2021, and the separate statement of comprehensive income, separate statement of changes in equity and separate statement of cash flows for the year then ended, and notes to the separate financial statements, including the summary of significant accounting policies.

In our opinion, the accompanying separate financial statements, presents fairly, in all material respects, the financial position of the Bank as at December 31, 2021, and its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRSs) and the Law of Ukraine On Accounting and Financial Reporting in Ukraine

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs).

Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of the Bank in accordance with the International Code of Ethics for Professional Accountants including International Independence Standards (IESBA Code) and ethical requirements that are relevant to our audit of the financial statements in Ukraine, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified opinion.

Material Uncertainty Related to Going Concern

We draw attention to Note 37 in the financial statements, which discloses that on February 24, 2022, Russian troops began invading Ukraine from Russia, Belarus, Crimea, and eastern Ukraine. Although the future prospects are uncertain, the economic consequences are already very serious: the number of refugees exceeds 4 million, in addition, there are large-scale destruction of key infrastructure in Ukraine. The damage the Russian army has inflicted on Ukraine's infrastructure is at least USD 200 billion, and the total damage has exceeded USD 500 billion. As a result of hostilities, half of Ukrainian enterprises and economic entities have temporarily or completely ceased their activities. As noted in Note 37, these events or conditions, together with other issues set out in Note 37, indicate that there is significant uncertainty that may cast significant doubt on the Bank's ability to continue as a going concern. Our opinion on this issue has not been modified.

During the audit of the financial statements, we concluded that the use of the principle of going concern by management in the preparation of financial statements is appropriate. Our assessment of management's assumptions about the Bank's ability to continue to apply the going concern basis in accounting included:

- assessment of the negative consequences of continued military aggression on the banking sector of Ukraine;
- analysis of the scenarios of the situation identified by the Bank's management and possible actions in response to the leadership of Ukraine, the world community and the Bank's management;
- analysis of possible changes in the basic indicators of the Bank's activities in terms of asset impairment, falling volumes and margins of banking operations;
- analysis of regulatory capital adequacy and liquidity, ways to maintain them at a sufficient level.



We have found that forecasts of the situation and the corresponding negative consequences are very difficult to build due to the unpredictability of the actions of the Russian leadership. At the same time, management assumptions about the most likely scenarios are relevant.

Our responsibilities and the responsibilities of management for going concern are described in the relevant sections of this report.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

In addition to the matter described in the Material Uncertainty Related to Going Concern section, we have determined the matters described below to be the key audit matters to be communicated in our report.

Key Audit Matter

Provision for loan impairment (Note 8)

The estimation of the provision for loan impairment is a key area of professional judgment of the Bank's management. Identifying of impairment and determination of amount of expected reimbursement include some assumptions and analysis of different factors, including the financial position of borrower, expected future cash flow and fair value of collaterals.

The use of various assumptions may be result of various estimates of the provision for loan impairment. Taking into account the materiality of customer credit balances and a certain level of subjectivity of judgments, we have determined the valuation of the provision for impairment as the key matter of the audit.

How the Key Audit Matter Was Considered in Our Audit

Our audit procedures included assessment of methodology used by the Bank to determine the signs of depreciation and calculating the provision for impairment, testing input data and assumption analysis. For provisions for loan impairment with detected individual signs of impairment, we have audited assumptions underlying the basis for detecting impairment and its quantitative assessment, including the analysis of financial indicators of borrowers, forecasts for future cash flows and collateral assessment. For provisions of loan impairment, calculated on collective basis, which have not been demonstrate individual signs of impairment, we analysed Bank's models and audited relevance and accuracy input data used in these models

We have found that the key assumptions used by management to estimate the amount of allowances for impairment of loans to customers are supported by available evidence.

Other Information

Management is responsible for the other information. The other information comprises the Management Report. The other information which we expected to receive after the date of this Auditor's report is Annual Information on the Issuer of Securities.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated.

If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

When we read the Annual Information on the Issuer of Securities, and if we conclude that there is a material misstatement therein, we are required to communicate the matter to those charged with governance and The NSSMC.

Responsibilities of Management and Those Charges with Governance for the Financial Statements

Management is responsible for preparation and fair presentation of these financial statements in accordance with the Law of Ukraine On Accounting and International Financial Reporting Standards and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.



Preparing the financial statements, management is responsible for assessment Bank's ability to continue as a going concern, disclosure, if applicable, issues regarding going concern and apply going concern as a basis for accounting, except, if the management plans to liquidate the Bank or discontinue the activity or have not any other real alternatives for it.

Supervisory Board is responsible for overseeing the process of financial reporting of the Bank.

Auditor's Responsibilities for the Audit of the Financial Statements

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

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

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

We provide the Supervisory Board with information about the planned scope and timing of the audit and significant audit results, including any significant deficiencies in internal control measures identified by us during the audit.

We also acknowledge to the Supervisory Board that we have complied with the relevant ethical requirements for independence, and inform them of any relationship and other matters that may reasonably be considered to affect our independence and, where applicable, of appropriate safeguards.

From the matters communicated with Supervisory Board, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.



Report on the requirements of other laws and regulations

Law of Ukraine "On Audit of Financial Statements and Auditing Activities"

In accordance with the Law of Ukraine "On Auditing Financial Statements and Auditing Activities", auditors must provide additional information and assurances.

Basic information about the audit firm

Full name	AC «CROWE UKRAINE»
Location	04210, 33 Obolonska Naberezhna, Kyiv,
Information on inclusion in the Register of audit firms and auditors	Registration number in the Register of Auditors and Audit Entities 3681
	An auditing entity that has the right to conduct a statutory audit of financial statements
	An auditing entity that has the right to conduct a statutory audit of the financial statements of public interest entities
Name of the body that appointed the auditing entity to conduct the statutory audit	Supervisory Board of the Bank
Date of appointment of the audit entity	30.09.2020 (Minute of the meeting of the Supervisory Board №127/2020)
Duration of the audit task	2nd year

The audit report is consistent with the supplementary report for the audit committee.

We did not provide services prohibited by law.

The key audit partner and audit entity are independent of the Bank in conducting the audit.

We did not provide services other than statutory audit services and services disclosed in the management report or financial statements.

ISAs require the auditor to plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. The term "sufficient certainty" allows for some risk of significant monetary inconsistencies that may remain undetected; it is also assumed that the auditor cannot provide an absolute guarantee of the accuracy and completeness of the financial statements. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. The terms of the ISAs require that the audit be planned in such a way as to ensure that errors and inconsistencies that could materially affect the financial statements are sufficiently probable. However, because the auditor will not audit all transactions performed by the entity during the year, the audit may not provide complete assurance that errors and inconsistencies, including fraud, will be identified.

The partner in the audit engagement that results in this independent auditor's report is Vitaliy Havrysh.

For and on behalf of AC CROWE	UKRAINE
Partner / Audit Director	X
Registered Auditor #100594	D

Kyiv, Ukraine March 29, 2022 Vitaliy Havrysh