

**Closed Joint-Stock Company
“MTBank”**

**Financial statements
prepared in accordance with IFRS,
together with independent auditor’s report**

for the year ended 31 December 2024

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Independent auditor’s report

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Translation from the original in Russian

Independent auditor's report

To Mr. Dmitry P. Shidlovich,
Chairman of the Management Board of CJSC "MTBank"

To the shareholders, the Supervisory Board, the Audit Committee
and the Management Board of CJSC "MTBank"

Opinion

We have audited the financial statements of Closed Joint-Stock Company "MTBank" (hereinafter, "CJSC "MTBank" or the "Bank") (address: Republic of Belarus, 220007, Minsk, Tolstogo str., 10; date of state registration: 14 March 1994; registration number in the State Register of Legal Entities and Individual Entrepreneurs: 100394906), which comprise the statement of financial position as at 31 December 2024, statement of comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies (hereinafter, the "financial statements").

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Bank as at 31 December 2024, and its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS).

Basis for opinion

We conducted our audit in accordance with the Law of the Republic of Belarus *On Auditing Activity*, national auditing rules effective in the Republic of Belarus and International Standards on Auditing (ISA). Our responsibilities under those rules and standards are further described in the *Responsibilities of the audit firm for the audit of the financial statements* section of our report. We are independent of the Bank in accordance with the International Ethics Standards Board for Accountants' (IESBA) International Code of Ethics for Professional Accountants (including international independence standards) (IESBA Code) together with the ethical requirements that are relevant to our audit of the financial statements in the Republic of Belarus, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.



NEW CHALLENGES
NEW SOLUTIONS

Translation from the original in Russian

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 for 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. For the matter below, our description of how our audit addressed the matter is provided in that context.

We have fulfilled the responsibilities described in the *Responsibilities of the audit firm for the audit of the financial statements* section of our report, including in relation to this matter. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the financial statements. The results of our audit procedures, including the procedures performed to address the matter below, provide the basis for our audit opinion on the accompanying financial statements.

Key audit matter

How our audit addressed the matter

Allowance for expected credit losses on loans to customers in accordance with IFRS 9

The estimation of the allowance for expected credit losses on loans to customers is a key area of judgment for the Bank's management.

Identification of factors of a significant increase in credit risk, including identification of changes in the risk of default occurring over the remaining life of a financial instrument, identification of default (impairment stages), as well as the estimation of probability of default, the level of recovery and forward-looking information involve significant use of professional judgment and assumptions.

The use of various models and assumptions in the calculation of expected credit losses can significantly affect the level of the allowance for expected credit losses on loans to customers. Due to substantial amounts of loans to customers and an extensive use of professional judgment, the estimation of the allowance for expected credit losses is a key audit matter.

Information on the allowance for expected credit losses on loans to customers, and the approach of the Bank's management to assessing and managing credit risk are provided in Notes 7 and 24 to the financial statements.

With regard to calculating the allowance for expected credit losses on loans to customers, our audit procedures included the analysis of the methodology, testing of controls over the customer lending process, including testing of controls over the accounting for overdue debt and procedures to identify factors of a significant increase in credit risk and default on loans to customers.

We considered the assumptions and inputs used by the Bank and models to calculate probability of default, the level of recovery and forward-looking information. We analyzed the classification of loans by impairment stage and the mathematical accuracy of the calculation of the allowance for expected credit losses.

We analyzed the financial position of borrowers, overdue and renegotiated exposures and sufficiency of collateral with respect to individually significant loans to legal entities and loans with higher credit risk.

We analyzed whether the Bank's management applied judgments consistently when calculating the allowance for expected credit losses.

We examined the information related to the allowance for expected credit losses on loans, disclosed in the notes to the financial statements.

Responsibilities of management and the Audit Committee of CJSC "MTBank" for the financial statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with IFRS, 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.

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

The Audit Committee of CJSC "MTBank" is responsible for overseeing the Bank's financial reporting process.

Responsibilities of the audit firm for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit, conducted in accordance with the Law of the Republic of Belarus *On Auditing Activity*, national auditing rules effective in the Republic of Belarus and ISA, 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.

Translation from the original in Russian

As part of our audit performed in accordance with the Law of the Republic of Belarus *On Auditing Activity*, national auditing rules effective in the Republic of Belarus and ISA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- ▶ Identify and evaluate 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 the risk of not detecting a material misstatement resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or override of internal control.
- ▶ Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.
- ▶ Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management and related disclosures.
- ▶ 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 Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Bank to cease to continue as a going concern.
- ▶ Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- ▶ Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Bank to express an opinion on the financial statements. We are responsible for the direction, supervision and performance of the Bank audit. We remain solely responsible for our audit opinion.

We communicate with the Supervisory Board and the Audit Committee of CJSC "MTBank" regarding, among other matters, the planned scope and timing of the audit, as well as significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide the Supervisory Board and the Audit Committee of CJSC "MTBank" with a statement that we have complied with all relevant ethical requirements regarding independence and communicated with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, threat mitigation actions or related safeguards.

Translation from the original in Russian

From the matters communicated to the Supervisory Board and the Audit Committee of CJSC "MTBank," we determine matters that were of most significance in the audit of the financial statements for the current period and are therefore key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matters 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.



Engagement Partner
Olga Mikhailovna Yarmakovich
General Director

Auditor's qualification certificate No. 0002233 issued by the Ministry of Finance of the Republic of Belarus.

Certificate of compliance with the qualification and business reputation requirements for auditors of banks, Joint-Stock Company "Development Bank of the Republic of Belarus," non-bank credit and financial institutions, banking groups and banking holdings No. 145.



Engagement Manager
Valeria Sergeevna Korik

Auditor's qualification certificate No. 0002718 issued by the Ministry of Finance of the Republic of Belarus.

Certificate of compliance with the qualification and business reputation requirements for auditors of banks, Joint-Stock Company "Development Bank of the Republic of Belarus," non-bank credit and financial institutions, banking groups and banking holdings No. 167.

This auditor's report was signed on 13 February 2025.

Auditor's report received by:

Chairman of the Management Board of
CJSC "MTBank"



Dmitry Petrovich Shidlovich

Details of the auditor

Name: B1 Audit Services Limited Liability Company
Registered in the State Register of Legal Entities and Individual Entrepreneurs on 7 April 2005, Registration No. 190616051.
Member of the Audit Chamber since 26 December 2019.
Registration No. 10051 in the register of auditors, entered on 1 January 2020.
Address: Republic of Belarus, 220004, Minsk, Klary Tsetkin str., 51A, 15th floor.

Statement of financial position**As at 31 December 2024***(in thousands of Belarusian rubles)*

	Note	31 December 2024	31 December 2023
Assets			
Cash and cash equivalents	5	1,301,815	867,706
Due from credit and financial institutions	6	58,666	82,138
Loans to customers	7	2,828,907	2,338,280
Investment securities	8	147,683	88,663
Property and equipment and right-of-use assets	9	55,252	48,470
Intangible assets	10	63,420	45,035
Other assets	12	54,084	40,453
Total assets		4,509,827	3,510,745
Liabilities			
Due to credit institutions	13	108,201	106,931
Due to customers	14	3,313,452	2,482,054
Debt securities issued	15	189,303	170,666
Current income tax liabilities		3,501	2,088
Deferred income tax liabilities	11	33,629	27,276
Subordinated debt	16	74,246	67,919
Other liabilities	12	45,909	44,622
Total liabilities		3,768,241	2,901,556
Equity			
Share capital	17	110,426	110,426
Investment securities revaluation reserve		1,592	1,643
Property and equipment revaluation reserve	9	4,158	2,233
Retained earnings	17	625,410	494,887
Total equity		741,586	609,189
Total equity and liabilities		4,509,827	3,510,745

Signed and authorized for release on behalf of the Management Board of CJSC "MTBank"

D.P. Shidlovich



Chairman of the Management Board

Y.G. Zakhvatovich

12 February 2025



Chief Financial Officer

Statement of comprehensive income**For the year ended 31 December 2024***(in thousands of Belarusian rubles)*

	Note	2024	2023
Interest income calculated using the effective interest rate method			
Loans to customers		290,239	238,263
Due from credit and financial institutions		20,295	4,435
Investment securities		4,404	3,950
		314,938	246,648
Other interest income		19,463	10,978
Interest expense			
Due to customers		(122,160)	(50,748)
Debt securities issued		(14,916)	(6,245)
Due to credit institutions		(4,420)	(3,547)
Subordinated debt		(4,060)	(3,355)
Operating lease liabilities		(632)	(332)
		(146,188)	(64,227)
Net interest income before allowance for expected credit losses on financial instruments		188,213	193,399
Allowances for expected credit losses on financial instruments	5, 6, 7, 8, 12, 19	(13,749)	(21,660)
Net interest income		174,464	171,739
Fee and commission income	21	193,712	169,856
Fee and commission expense	21	(105,245)	(94,519)
Realized gains/(losses) from investment securities reclassified to profit or loss		14	121
Net gains from foreign currencies	20	67,283	52,506
- <i>Dealing</i>		68,163	49,153
- <i>Revaluation of currency items</i>		(883)	3,351
- <i>Foreign currency derivatives</i>		3	2
Net gains from precious metals		2,034	585
Other income	22	24,858	36,839
Non-interest income		182,656	165,388
Personnel expenses	23	(98,289)	(83,010)
Depreciation and amortization	9, 10	(21,440)	(19,727)
Other operating expenses	23	(60,185)	(57,786)
Other impairment losses	12	(637)	(348)
Non-interest expense		(180,551)	(160,871)
Profit before income tax expense		176,569	176,256
Income tax expense	11	(46,046)	(44,973)
Profit for the year		130,523	131,283

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D.P. Shidlovich

Chairman of the Management Board

Y.G. Zakhvatovich

Chief Financial Officer

12 February 2025

The accompanying notes on pages 7-79 are an integral part of these financial statements.

Statement of comprehensive income (continued)

	Note	2024	2023
Profit for the year		130,523	131,283
Other comprehensive income			
<i>Other comprehensive income to be reclassified to profit or loss in subsequent periods</i>			
Amount of accumulated earnings/(losses) reclassified to profit or loss upon disposal of debt instruments at fair value through other comprehensive income		(14)	(121)
Net change in fair value of debt instruments at fair value through other comprehensive income		(1,033)	887
Change in allowance for expected credit losses on debt instruments at fair value through other comprehensive income		996	(70)
Net other comprehensive income to be reclassified to profit or loss in subsequent periods		(51)	696
<i>Other comprehensive income not to be reclassified to profit or loss in subsequent periods</i>			
Revaluation of buildings and structures	9	2,567	2,925
Income tax related to components of other comprehensive income	11	(642)	(731)
Total other comprehensive income not to be reclassified to profit or loss in subsequent periods		1,925	2,194
Other comprehensive income for the year, net of tax		1,874	2,890
Total comprehensive income for the year		132,397	134,173

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D.P. Shidlovich

Chairman of the Management Board

Y.G. Zakhvatovich

Chief Financial Officer

12 February 2025



Statement of changes in equity**For the year ended 31 December 2024***(in thousands of Belarusian rubles)*

	Share capital	Investment securities revaluation reserve	Property and equipment revaluation reserve	Retained earnings	Total
At 1 January 2023	110,426	947	39	407,440	518,852
Profit for the year	—	—	—	131,283	131,283
Other comprehensive income					
Change in investment securities revaluation reserve	—	696	—	—	696
Change in property and equipment revaluation reserve	—	—	2,194	—	2,194
Total other comprehensive income	—	696	2,194	—	2,890
Total comprehensive income for the year	—	696	2,194	131,283	134,173
Transactions with shareholders					
Dividends paid (Note 17)	—	—	—	(43,836)	(43,836)
Total transactions with shareholders	—	—	—	(43,836)	(43,836)
At 31 December 2023	110,426	1,643	2,233	494,887	609,189
Profit for the year	—	—	—	130,523	130,523
Other comprehensive income					
Change in investment securities revaluation reserve	—	(51)	—	—	(51)
Change in property and equipment revaluation reserve	—	—	1,925	—	1,925
Total other comprehensive income	—	(51)	1,925	—	1,874
Total comprehensive income for the year	—	(51)	1,925	130,523	132,397
At 31 December 2024	110,426	1,592	4,158	625,410	741,586

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D.P. Shidlovich

Chairman of the Management Board

Y.G. Zakhvatovich

Chief Financial Officer

12 February 2025

Statement of cash flows**For the year ended 31 December 2024***(in thousands of Belarusian rubles)*

	Note	2024	2023
Cash flows from operating activities			
Interest received		322,228	253,682
Interest paid		(142,190)	(57,353)
Fees and commissions received		192,854	170,483
Fees and commissions paid		(105,967)	(94,235)
Realized gains less losses from foreign currencies		68,117	49,490
Gains less losses from precious metals		574	209
Other income received		29,174	36,046
Personnel expenses paid		(97,920)	(82,948)
Other operating expenses paid		(59,798)	(56,549)
Cash flows from operating activities before changes in operating assets and liabilities		207,072	218,825
<i>Net (increase)/decrease in operating assets</i>			
Due from credit institutions		17,486	(12,097)
Loans to customers		(444,818)	(822,130)
Other assets		(18,614)	(21,797)
<i>Net increase/(decrease) in operating liabilities</i>			
Due to credit institutions		(112)	49,782
Due to customers		756,220	879,435
Other liabilities		(2,938)	3,432
Net cash flows from operating activities before income tax		514,296	295,450
Income tax paid		(38,271)	(42,467)
Net cash from operating activities		476,025	252,983
Cash flows from investing activities			
Purchase of investment securities		(78,707)	(18,222)
Proceeds from sale and redemption of investment securities		29,673	22,460
Purchase of property and equipment and intangible assets	9, 10	(35,028)	(22,907)
Proceeds from sale of property and equipment and intangible assets	9, 10, 22	704	938
Net cash received from / (used in) investing activities		(83,358)	(17,731)

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D.P. Shidlovich

Chairman of the Management Board

Y.G. Zakhvatovich

Chief Financial Officer

12 February 2025



Statement of cash flows (continued)

	Note	2024	2023
Cash flows from financing activities			
Proceeds from issue of debt securities		617,662	545,656
Redemption of debt securities issued		(597,237)	(432,740)
Proceeds from subordinated loans received		—	13,148
Redemption of subordinated loans		—	(1,000)
Dividends paid	17	—	(43,836)
Payments related to lease liabilities	12	(9,491)	(7,818)
Net cash (used in) / from financing activities		10,934	73,410
Effect of exchange rate changes on cash and cash equivalents		30,416	47,787
Net increase in cash and cash equivalents		434,017	356,449
Cash and cash equivalents at the beginning of the reporting year		867,706	511,291
Allowance for expected credit losses	5	92	(34)
Cash and cash equivalents at the end of the reporting year	5	1,301,815	867,706

In 2024, the income tax offset against the income tax paid in a foreign country totaled BYN 651 thousand.

Signed and authorized for release on behalf of the Management Board of CJSC "MTBank"

D.P. Shidlovich

Chairman of the Management Board

Y.G. Zakhvatovich

Chief Financial Officer

12 February 2025



(in thousands of Belarusian rubles)

1. Principal activities

Closed Joint-Stock Company "MTBank" (hereinafter, "CJSC "MTBank" or the "Bank") was registered under the laws of the Republic of Belarus by the National Bank of the Republic of Belarus (hereinafter – the "National Bank") on 16 May 1994 as a closed joint-stock commercial bank with foreign investment. The Bank's activities are regulated by the National Bank. The Bank operates under banking license No. 13 issued by the National Bank on 9 February 2024. The Bank also holds license No. 02200/5200-1246-1112 for professional securities and stock exchange operations issued by the Ministry of Finance of the Republic of Belarus pursuant to the decision of 24 October 1995 and license No. 01019/68 issued by the Operational and Analytical Center under the President of the Republic of Belarus for the right to carry out technical and/or cryptographic protection of information pursuant to decision No. 48 of 25 May 2007.

The Bank accepts deposits from individuals, extends credit and makes cash transfers in the Republic of Belarus and abroad, provides currency exchange and other banking services to legal entities and individuals. The Bank's head office is located at 10, Lva Tolstogo str., Minsk. During the reporting period, the legal address of the Bank remained unchanged.

As at 31 December 2024, the Bank's structure comprised a head office, one center for banking services, 46 cash settlement centers and 26 remote workplaces.

As at 31 December 2023, the Bank's structure comprised a head office, one center for banking services, 38 cash settlement centers and 35 remote workplaces.

As at 31 December 2024 and 2023, the Bank had neither subsidiaries nor associates.

As at 31 December 2024 and 2023, the Bank's outstanding shares were owned by the following shareholders:

Shareholder	31 December 2024	31 December 2023
MTB Investments Holdings Limited, Cyprus	99.1326%	99.1326%
Other	0.8674%	0.8674%
	100.000%	100.000%

The Bank's ultimate controlling owner is Mr. Abdo Romeo Abdo.

2. Basis of preparation

General

These financial statements have been prepared in accordance with International Financial Reporting Standards (IFRS) as issued by the International Accounting Standards Board (IASB) and Interpretations issued by the International Financial Reporting Interpretations Committee (IFRIC).

In accordance with the Belarusian accounting and banking legislation and related instructions (hereinafter, "BAS"), the Bank is required to maintain accounting records and prepare financial statements in Belarusian rubles. These financial statements are based on the Bank's BAS accounting data, as adjusted and reclassified in order to comply with IFRS.

The Bank's functional currency is the Belarusian ruble (BYN).

The financial statements have been prepared under the historical cost convention except for certain non-cash items that originated before 31 December 2014, which were recognized in accordance with IAS 29 *Financial Reporting in Hyperinflationary Economies*, and certain items that are recognized at fair value, namely, "Debt securities at fair value through other comprehensive income" and "Buildings and structures."

These financial statements are presented in thousands of Belarusian rubles ("BYN thousand").

The Bank's shares are not publicly traded, securities issued by the Bank are not included in the quotation lists of OJSC Belarusian Currency and Stock Exchange, the Bank is not recognized as a listed company and, accordingly, does not apply IAS 33 *Earnings per Share* and IFRS 8 *Operating Segments*.

(in thousands of Belarusian rubles)

2. Basis of preparation (continued)

Going concern

The Bank's management assessed its ability to continue as a going concern considering all available information on the future. The Bank developed and approved adequate and realistic action plans to ensure compliance with the course of development set forth in the strategic goals, and to ensure the Bank's operation in the environment affected by external factors, as well as crisis financing plans. Based on the analysis of the factors relevant to the current and expected profitability of the Bank, debt repayment schedules and potential refinancing sources, the Bank's management considers it appropriate to use the going concern assumption in the foreseeable future.

The Bank's management analyzed the possible impact of the geopolitical and macroeconomic situation on the financial position and performance of the Bank by conducting a comprehensive stress test of the Bank's solvency and liquidity, as well as assessing the credit risk of the largest borrowers. Stress testing involved assessing the impact on the Bank's stability of the basic and two stress macroeconomic scenarios (moderate shock scenario, severe shock scenario). Management believes that based on the results of the stress testing, the Bank ensures compliance with the regulatory capital adequacy ratio, absence of negative accumulated liquidity gaps and profitability of its operations. The estimated resource outflows and changes in the quality of loan portfolios do not threaten the security of the Bank's operations.

Operating environment

Since February 2022, increased geopolitical tensions and Russia's special military operation in Ukraine have had a negative impact on the Belarusian economy. The Republic of Belarus has been affected by negative external factors resulting from growing sanctions pressure. The European Union, the United States and some other countries have imposed new sanctions against certain economy sectors and some Belarusian state and commercial organizations, including banks and individuals, as well as restrictions on certain types of transactions, including blocking of cash balances on accounts with foreign banks and blocking of payments on Eurobonds issued by the Republic of Belarus. Some international companies announced that they were suspending their operations in the Republic of Belarus or terminating supplies of products to the Republic of Belarus.

Despite the negative foreign policy factors, in 2024, financial and currency markets stabilized after a period of increased volatility in 2022 and 2023. The refinancing rate remained at 9.5% p.a. In 2024, the inflation rate was 5.2%, with the target level of 6%.

In 2024, the GDP of Belarus increased by 4% and amounted to BYN 246.6 billion in current prices.

In 2024, the foreign trade balance for goods and services was negative (USD 1.3 billion compared to the positive balance of USD 246.4 million in 2023).

In 2024, the Belarusian ruble weakened against major foreign currencies. The official exchange rates changed from BYN 3.1775 for USD 1 to BYN 3.4735 for USD 1; from BYN 3.5363 for EUR 1 to BYN 3.6246 for EUR 1; from BYN 4.4414 for CNY 10 to BYN 4.8500 for CNY 10 year-on-year. At the same time, the Belarusian ruble strengthened against the Russian ruble. The official exchange rate changed from BYN 3.4991 for RUB 100 to BYN 3.3488 to RUB 100 year-on-year.

In 2022, international rating agencies downgraded sovereign ratings of the Republic of Belarus (S&P – to the SD grade, Fitch – to the RD grade, Moody's – to the Ca grade). In 2023, S&P and Fitch withdrew their ratings, while Moody's lowered its rating to C. At the same time, ratings assigned by Russian rating agencies became more widely used in the Republic of Belarus to avoid the geopolitical influence. In 2022, according to the ACRA rating agency, the long-term foreign currency credit rating of the government of the Republic of Belarus was set at B+ (with a developing outlook) that was also effective in 2023. In November 2023, this rating was canceled due to nonanalytic reasons. Local and foreign currency sovereign credit ratings of the Republic of Belarus were not assessed nor assigned in 2024.

On 3 October 2024, the Russian rating agency Expert RA upgraded the credit rating of CJSC "MTBank" from byBBB to byBBB+ with a stable outlook.

The Bank continues to assess the effect of these events and changing macroeconomic conditions on its activities, financial position and financial results.

Inflation accounting

Up to 31 December 2014, the Belarusian economy was considered to be hyperinflationary in accordance with the criteria set forth in IAS 29 *Financial Reporting in Hyperinflationary Economies* (IAS 29). Accordingly, adjustments and reclassifications for the purposes of presentation of IFRS financial statements include restatement, in accordance with IAS 29, for changes in the general purchasing power of the Belarusian ruble.

(in thousands of Belarusian rubles)

2. Basis of preparation (continued)

Inflation accounting (continued)

Starting 1 January 2015, the Belarusian economy is no longer considered hyperinflationary, thus the cost of the Bank's non-monetary assets, liabilities and equity presented in measuring units as at 31 December 2014 was used to calculate the opening balances as at 1 January 2015.

The Bank operates in the Republic of Belarus. Accordingly, the Bank's business is affected by the economy and financial markets of Belarus, which display characteristics of a developing market. The legal, tax and regulatory frameworks continue to develop but are subject to varying interpretations and frequent changes which together with other legal and fiscal impediments contribute to the challenges faced by entities operating in Belarus. The methods of monetary policy regulation, adopted by the National Bank, made it possible to reduce both the volatility of the Belarusian ruble and the level of inflation over the past several years. Despite this, the depreciation of the Belarusian ruble preceding the stabilization period and the subsequent high inflation still lead to some uncertainty concerning the business environment in the Republic of Belarus.

These financial statements reflect management's assessment of the impact of the Belarusian business environment on the operations and the financial position of the Bank. The actual impact of the future business environment may differ from management's estimates.

3. Summary of accounting policies

Financial assets and financial liabilities

a) Classification of financial instruments

Financial assets

A financial asset at initial recognition is classified as measured at amortized cost or at fair value through other comprehensive income (FVOCI) or at fair value through profit or loss (FVPL).

A financial asset is measured at amortized cost if it meets both of the following conditions and is not designated by the Bank as at FVPL:

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

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

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

For debt financial assets measured at FVOCI, gains and losses are recognized within other comprehensive income, except for the following items recognized within profit or loss in the same manner as for financial assets measured at amortized cost:

- ▶ Interest income calculated using the effective interest rate method;
- ▶ Expected credit losses and recovered impairment losses; and
- ▶ Gains or losses from changes in exchange rates.

On derecognition of a debt financial asset at fair value through other comprehensive income, accumulated profit or loss that were previously recognized in other comprehensive income are reclassified from equity to profit or loss.

On initial recognition of an equity investment that is not held for trading, the Bank may irrevocably elect to present subsequent changes in fair value in other comprehensive income. This election is made for each investment separately.

For such equity instruments, gains and losses are never reclassified into profit or loss and no impairment is recognized in profit or loss.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Financial assets and financial liabilities (continued)

All other financial assets are classified as measured at FVPL.

In addition, at initial recognition, the Bank may irrevocably designate a financial asset that otherwise meets the requirements to be measured at amortized cost or FVOCI as measured at FVPL, if doing so eliminates or significantly reduces a recognition inconsistency that would otherwise arise.

Business model assessment

The Bank assesses the business model under which the asset is held at the level of the portfolio of financial instruments, as this best reflects the method used to manage business and present information to management. The information considered by the Bank includes:

- ▶ Policies and objectives established to manage the portfolio, and how they are implemented in practice. In particular, whether the management strategy is focused on generating contractual interest income, maintaining a certain structure of interest rates, ensuring correlation of the maturities of financial assets with the maturities of financial liabilities used to finance these assets, or realizing cash flows through the sale of assets.
- ▶ The procedure to assess the performance of the portfolio and the way this information is communicated to the Bank's management.
- ▶ Risks that affect the business model performance (and the performance of financial assets held within that business model) and the way these risks are managed.
- ▶ Ways to remunerate managers responsible for managing the portfolio (for example, whether the remuneration depends on the fair value of the assets or the contractual cash flows received from the assets).
- ▶ Frequency, volume and timing of sales in prior periods, reasons for such sales and expectations about future sales activity. However, information on sales activity is considered not in isolation but as part of an overall assessment of how the Bank achieves its objective for managing financial assets and how cash flows are realized.

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

Assessment of whether the contractual cash flows are solely payments of principal and interest

For the purpose of this assessment, 'principal' is defined as fair value of a financial asset at initial recognition. 'Interest' is defined as consideration for the time value of money, for credit risk related to the principal amount outstanding during a certain period, and for other primary credit-related risks and costs (for example, liquidity risk and administrative expenses), and includes profit margin.

When determining whether the contractual cash flows are solely payments of principal and interest on the principal amount outstanding (the SPPI criterion), the Bank analyzes contractual terms of the financial instrument. This includes the assessment of whether a financial asset contains a contractual provision that can change the terms or amount of contractual cash flows so that the financial asset will no longer comply with this criterion. When performing the assessment, the Bank considers:

- ▶ Contingencies that can change the terms or the amount of cash flows.
- ▶ Leverage features.
- ▶ Early repayment and prolongation provisions.
- ▶ Provisions limiting the Bank's claims to cash flows from specified assets (e.g., non-recourse loans).
- ▶ Provisions that modify consideration for the time value of money (e.g., regular revision of interest rates).

Reclassification

Financial assets are not reclassified after initial recognition, except in the period when the Bank changes its business model to manage financial assets.

Financial assets measured at amortized cost are initially measured at fair value plus incremental direct transaction costs and subsequently at their amortized cost using the effective interest rate method.

Financial assets measured at fair value are initially measured at fair value plus, if the financial assets are not measured at FVPL, the relevant transaction costs and are subsequently recognized at fair value.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Financial assets and financial liabilities (continued)

Gains or losses from financial assets measured at FVOCI are recorded in other comprehensive income, excluding interest income calculated using the effective interest rate method, expected credit losses and recovery of amounts written off to losses, and exchange rates recognized in profit or loss.

Gains and losses on financial assets at FVPL are recognized in profit or loss at subsequent revaluation of a financial instrument.

Financial liabilities

The Bank classifies financial liabilities, other than financial guarantees and loan commitments, as measured at amortized cost or at FVPL.

Reclassification

Financial liabilities are not reclassified after initial recognition.

b) Offsetting financial instruments

Financial assets and liabilities are offset and the net amount is reported in the statement of financial position only when there is a legally enforceable right to set off the recognized amounts, and there is an intention to settle on a net basis, or to realize the asset and settle the liability simultaneously. The right to set off must not be contingent on a future event and should be enforceable in all the following circumstances:

- ▶ In the ordinary course of business;
- ▶ In the event of default; and
- ▶ In the event of insolvency or bankruptcy of an entity or any of its counterparties.

These conditions are not generally the case with master netting agreements, and the related assets and liabilities are presented gross in the statement of financial position.

c) Derecognition of financial instruments

Financial assets

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

When the financial asset is derecognized, the difference between the carrying amount of the asset (or the carrying amount allocated to the derecognized part of the asset) and the amount of (i) consideration received (including the amount of the asset received less the new assumed liability) and (ii) any accumulated profit or loss recognized within other comprehensive income is recognized within profit or loss.

Any interest in transferred financial assets that qualify for derecognition, which is created or retained by the Bank, is recognized as a separate asset or liability.

The Bank enters into transactions whereby it transfers the assets recognized in the statement of financial position, but retains either all or substantially all risks and rewards of ownership of transferred assets or their part. In such cases, transferred assets are not derecognized. Examples of such transactions include securities lending and repurchase transactions.

In transactions where the Bank neither retains nor transfers substantially all the risks and rewards of ownership of the asset and retains control of the transferred asset, the asset continues to be recognized to the extent of the Bank's continuing involvement in the asset, determined as the Bank's exposure to the risk of change in the value of the transferred asset.

Financial liabilities

The Bank derecognizes a financial liability when the contractual obligation is fulfilled or cancelled or expires.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Financial assets and financial liabilities (continued)

d) *Modifications to the terms of financial assets and financial liabilities*

Modification of financial assets

If the terms of the financial asset are changed, the Bank assesses whether cash flows related to such a modified asset change substantially. If there is a substantial change in cash flows (substantial modification), the rights to contractual cash flows on the original financial asset are considered to be expired. In this case, the original financial asset is derecognized and the new financial asset is recognized at fair value plus the respective transaction costs. Fees resulting from the modification are recognized as follows:

- ▶ Fees recognized when the fair value of the new asset is measured and fees comprising compensation of transactions costs are included in the initial measurement of this asset.
- ▶ Other fees are recognized within profit or loss as part of profit or loss from derecognition.

Changes in cash flows on existing financial assets or financial liabilities are not considered as a modification, if they result from existing contractual terms, e.g., changes in the Bank's interest rates due to changes in the National Bank's refinancing rate, if the corresponding loan agreement provides for the Bank to be able to change interest rates.

The Bank performs a quantitative and qualitative assessment of whether the modification of terms is substantial, i.e., whether cash flows on the original financial asset and cash flows on the modified or replacing financial asset are substantially different. The Bank performs a qualitative and quantitative assessment of whether the modification is substantial by analyzing qualitative factors, quantitative factors and the cumulative effect of qualitative and quantitative factors. If the cash flows are substantially different, the rights to contractual cash flows on the original financial asset are deemed to have expired. In making this assessment, the Bank follows the guidance on derecognition of financial liabilities.

The Bank concludes that the modification is substantial based on the following qualitative factors:

- ▶ Change in the currency of a financial asset.
- ▶ Change in the terms of the financial asset resulting in a failure to meet the SPPI criterion.

Generally, if the modification results from financial difficulties of the borrower, the objective of such a modification is to recover the maximum amount of the asset in accordance with the original terms of the agreement, and not to create (issue) a new asset on substantially different terms. If the Bank plans to modify a financial asset in a way that would result in forgiveness of a portion of contractual cash flows, then it first considers whether a part of the asset should be written off before the modification takes place (see the write-off policy below). This approach impacts the result of the quantitative assessment and results in non-compliance with the criteria for derecognition of the respective financial asset in such cases. The Bank also performs a qualitative assessment of whether the modification is substantial.

If the modification of the terms of a financial asset measured at amortized cost or FVOCI does not result in derecognition of this financial asset, the Bank recalculates the gross carrying amount of such an asset using the original effective interest rate on the asset and recognizes the arising difference as a modification gain or loss within profit or loss. For financial assets with floating interest rates, the original effective interest rate used to calculate the modification gain or loss is adjusted in order to reflect current market conditions at the time of the modification. Costs incurred or fees paid and fees earned as a result of such a modification adjust the gross carrying amount of the modified financial asset and are amortized over the remaining life of the modified financial asset.

If the modification takes place due to financial difficulties of the borrower, the respective gain or loss is presented within impairment losses. In all other cases, the respective gain or loss is presented within interest income calculated using the effective interest rate method.

For loans with fixed interest rates, where the borrower has the right to early repayment of the loan at nominal value without substantial penalties, the Bank's accounting treatment of a change in the interest rate to the market level in response to a change in market conditions is similar to the accounting treatment of instruments with floating interest rates, i.e., the effective interest rate is revised prospectively.

Modification of financial liabilities

The Bank derecognizes a financial liability when its terms are modified in such a way that the amount of cash flows from the modified liability substantially changes. In this case, the new financial liability with modified terms is recognized at fair value. The difference between the carrying amount of the original financial liability and the amount of the new financial liability with modified terms is recognized within profit or loss. Consideration paid includes transferred non-financial assets, if any, and assumed liabilities, including the new modified financial liability.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Financial assets and financial liabilities (continued)

The Bank performs a qualitative and quantitative assessment of whether the modification is substantial by analyzing qualitative factors, quantitative factors and the cumulative effect of qualitative and quantitative factors. The Bank concludes that the modification is substantial based on the following qualitative factors:

- ▶ Change in the currency of a financial liability.
- ▶ Inclusion of a conversion condition.
- ▶ Change in the subordination of the financial liability.

For the purpose of the quantitative assessment, the terms are considered to be substantially different if the present value of the cash flows under the modified terms, including net fees, discounted at the original effective interest rate is at least 10% different from the discounted present value of the remaining cash flows under the old terms.

If the modification of the terms of a financial liability does not result in its derecognition, the amortized cost of the liability is recalculated by discounting the modified cash flows using the original effective interest rate and the arising difference is recognized as a modification gain or loss within profit or loss. For financial liabilities with floating interest rates, the original effective interest rate used to calculate the modification gain or loss is adjusted in order to reflect current market conditions at the time of the modification. Costs incurred or fees paid as a result of the modification are recognized as an adjustment to the carrying amount of the liability and are amortized over the remaining term of the modified financial liability by recalculating the respective effective interest rate.

e) *Impairment*

The Bank recognizes an allowance for expected credit losses (ECL) for the following financial instruments that are not measured at FVPL:

- ▶ Financial assets that are debt instruments;
- ▶ Net investments in finance leases;
- ▶ Issued financial guarantees; and
- ▶ Issued loan commitments.

No impairment loss is recognized for investments in equity instruments.

The Bank recognizes allowances for ECL in the amount of lifetime ECL, except for financial instruments for which credit risk has not increased significantly since their initial recognition.

The Bank does not apply an exemption associated with low credit risk.

12-month ECL are the portion of ECL resulting from defaults on a financial instrument that are possible within 12 months after the reporting date. Financial instruments for which 12-month ECL are recognized are included in Stage 1 financial instruments.

Lifetime ECL are defined as ECL arising from all possible events of default over the entire expected life of a financial instrument. Financial instruments that are not purchased or originated credit-impaired (POCI) assets for which lifetime ECL are recognized are included in Stage 2 (if the credit risk on the financial instrument increased significantly after initial recognition but the financial instrument is not credit-impaired) and Stage 3 (if the financial instrument is credit-impaired).

Measurement of ECL

ECL are a default probability-weighted estimate of credit losses. They are measured as follows:

- ▶ Financial assets that are not credit-impaired at the reporting date: as the present value of the difference between the future contractual cash flows due to the Bank and the cash flows that the Bank expects to receive.
- ▶ Financial assets that are credit-impaired at the reporting date: as the difference between the gross carrying amount of assets and the present value of estimated future cash flows discounted using the original effective interest rate.
- ▶ Unused portion of loan commitments: as 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 if the loan is issued.
- ▶ Financial guarantee contracts: as the present value of expected payments to reimburse the holder for a credit loss less any amounts that the Bank expects to recover.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Financial assets and financial liabilities (continued)

Credit-impaired financial assets

At each reporting date, the Bank assesses whether financial assets carried at amortized cost, debt financial assets measured at FVOCI, financial guarantees, loan commitments and net investments in finance leases are credit-impaired. A financial asset is determined to be credit-impaired when there is one or more events that have a negative effect on the estimated future cash flows from this asset.

The list of impairment events applied by the Bank when analyzing borrowers is presented in Note 24.

Purchased or originated credit-impaired assets (POCI assets)

POCI assets are purchased or originated financial assets that are credit-impaired at initial recognition.

Pursuant to the Bank's accounting policy, new financial instruments of an existing debtor are classified as POCI if there are indicators of the debtor's credit impairment. Financial assets of new debtors are classified as POCI if they are purchased at a discount reflecting credit impairment.

A new financial instrument of the debtor that has indicators of credit impairment is not classified as POCI in the following cases:

- ▶ Financing provided under existing credit facilities.
- ▶ Receivables from principals under financial guarantees or receivables from payers under unsecured letters of credit.
- ▶ Funds paid under reverse repo transactions provided that the amount and liquidity of collateral meet the Bank's requirements.
- ▶ Assignment of rights of claim to another related debtor that also has indicators of credit impairment.

POCI assets are recorded at fair value at initial recognition, with interest income being subsequently recognized based on the credit-adjusted effective interest rate. An allowance for expected credit losses is recognized or reversed only to the extent that there is a subsequent significant change in expected credit losses. As at each reporting date, changes in expected credit losses for the entire term are recognized in profit or loss as an impairment gain or loss.

Recording the allowance for ECL in the statement of financial position

The allowance for ECL is presented in the statement of financial position as follows:

- ▶ Financial assets measured at amortized cost: as a decrease in the gross carrying amount of these assets. Where a financial instrument contains both a drawn and an undrawn component, the Bank determines ECL collectively on the financial asset and on the assumed loan commitment: the cumulative amount is presented as a decrease in the gross carrying amount of the financial asset.
- ▶ Financial guarantees: generally, as a provision.
- ▶ Debt instruments measured at FVOCI: the allowance for ECL is not recorded in the statement of financial position as the carrying amount of these assets equals their fair value. However, the allowance for ECL is disclosed and recognized within the fair value provision.

Write-offs

Loans and debt securities are written off (either partially or in full) when there is no reasonable expectation that a financial asset will be recovered (either partially or in full).

Recoveries of amounts previously written off are recorded within other income in the statement of comprehensive income.

Financial assets that are written off could still be subject to enforcement activities in order to comply with the Bank's internal policies.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Financial assets and financial liabilities (continued)

f) Fair value measurement of financial instruments

The Bank measures financial instruments, such as investment securities and derivatives, at fair value at each reporting date. Fair values of financial instruments at amortized cost are disclosed in Note 25.

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 fair value measurement is based on the presumption that the transaction to sell the asset or transfer the liability takes place either:

- ▶ In the principal market for the asset or liability; or
- ▶ In the absence of a principal market, in the most advantageous market for the asset or liability.

To determine the fair value, the Bank should have access to the principal or the most advantageous market. The fair value of an asset or a liability is measured using the assumptions that market participants would use when pricing the asset or liability assuming that market participants act in their economic best interest. A fair value measurement of a non-financial asset takes into account a market participant's ability to generate economic benefits by using the asset in the best and most effective way or by selling it to another market participant that would use the asset in the best and most effective way.

The Bank uses valuation techniques that are appropriate in the circumstances and for which sufficient data is available to measure fair value, maximizing the use of relevant observable inputs and minimizing the use of unobservable inputs.

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorized within the fair value hierarchy, described as follows, based on the lowest level input that is significant to the fair value measurement as a whole:

- ▶ Level 1 – quoted (unadjusted) prices in active markets for identical assets or liabilities.
- ▶ Level 2 – valuation techniques for which the lowest level inputs that are significant to the fair value measurement are directly or indirectly observable.
- ▶ Level 3 – valuation techniques for which the lowest level inputs that are significant to the fair value measurement are unobservable.

For assets and liabilities that are recognized in the financial statements on a recurring basis, the Bank determines whether transfers have occurred between levels in the hierarchy by re-assessing classification (based on the lowest level inputs that are significant to the fair value measurement as a whole) at the end of each reporting period.

Cash and cash equivalents

Cash and cash equivalents include cash on hand, highly liquid amounts due from the National Bank (excluding mandatory cash balances) and highly liquid amounts due from credit institutions that initially mature within 90 days and are free from any contractual liabilities, which can be readily converted to a known amount of cash and are subject to an insignificant risk of changes in value.

Precious metals

Physical precious metals are recorded at the lower of historical cost and net realizable value at the reporting date. Assets and liabilities denominated in monetary precious metals are recognized at accounting prices of the National Bank. Changes in accounting prices for precious metals are recorded as a result from revaluation of financial precious metals in the statement of profit or loss.

The carrying amount of precious metals is recorded in other assets.

Due from credit and financial institutions

Due from credit and financial institutions include amounts of mandatory cash balances deposited with the National Bank, amounts due from credit and financial institutions with an initial repayment period of over 90 days, funds transferred as collateral for the Bank's operations, or funds with no initial repayment schedules, guarantee deposits and other restricted cash.

Due from banks, except for correspondent accounts in precious metals, are initially recognized at fair value and are subsequently carried at amortized cost using the effective interest rate method. Correspondent accounts in precious metals are recognized and carried at fair value.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Repurchase and reverse repurchase agreements and securities lending

Sale and repurchase agreements ("repo") are treated as secured financing transactions. Securities sold under sale and repurchase agreements are retained in the statement of financial position and, in case the counterparty has the right by contract or custom to sell or repledge them, reclassified as securities pledged under sale and repurchase agreements. The corresponding liabilities are presented within amounts due to credit institutions or customers. Securities purchased under agreements to resell ("reverse repo") are recorded as amounts due from credit institutions or loans to customers as appropriate. The difference between the selling price and the repurchase price is treated as interest and accrued over the life of repo agreements using the effective interest rate method. Reverse repo agreements with credit institutions up to 90 days are recorded as cash and cash equivalents.

Securities lent to counterparties are retained in the statement of financial position. Securities borrowed are not recorded in the statement of financial position unless these are sold to third parties, in which case the purchase and the sale are recorded within gains less losses from trading securities in the statement of comprehensive income. The obligation to return them is recorded at fair value as a trading liability.

Derivative financial instruments

In the normal course of business, the Bank enters into various derivative financial instruments including currency forwards and swaps. Such financial instruments are held for trading and initially recorded at fair value. Fair values are estimated based on quoted market prices or pricing models that take into account current market and contractual prices of the underlying instruments and other factors.

Derivative financial instruments are carried as assets when their fair value is positive and as liabilities when it is negative. Gains and losses arising from transactions with these instruments are recorded in the statement of comprehensive income in net income/(expense) on foreign currency transactions.

Taxation

Current income tax expense is calculated in accordance with the regulations of the Republic of Belarus.

Deferred tax assets and liabilities are calculated in respect of all temporary differences using the liability method. Deferred income taxes are provided for all temporary differences arising between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes, except where the deferred income tax arises from the initial recognition of goodwill or of an asset or liability in a transaction that is not a business combination and, at the time of the transaction, affects neither the accounting profit nor taxable profit or loss.

A deferred tax asset is recognized only to the extent that it is probable that taxable profit will be available in the future, against which the deductible temporary differences and carried forward losses can be offset. Deferred tax assets and liabilities are measured at tax rates that are expected to apply to the period when the asset is realized or the liability is settled, based on tax legislation that has been enacted or substantively enacted at the reporting date.

The Republic of Belarus also has various operating taxes that are assessed on the Bank's activities. These taxes are included as a component of other operating expenses.

Property and equipment

Property and equipment, except for the "Buildings and structures" category, are carried at cost, excluding the costs of day-to-day servicing, less accumulated depreciation and any accumulated impairment, as adjusted for hyperinflation. Such cost includes the cost of replacing equipment when that cost is incurred, if the recognition criteria are met.

The Bank uses a revaluation model for "Buildings and structures" items, which are accounted for at revalued cost, as described below, less accumulated depreciation and accumulated impairment losses. Revaluation of buildings should be carried out with sufficient regularity to ensure that the carrying amount does not differ significantly from the amount which would be determined using fair value at the end of the reporting period. An increase in the carrying amount as a result of revaluation is recorded in other comprehensive income and in equity as "Revaluation of property and equipment." A decrease in the carrying amount offset against previous increases in the carrying amount of the same asset is recorded in other comprehensive income and reduces the effect of the "Revaluation of property and equipment" previously recorded in equity. All other cases of a decrease in carrying amounts are recorded in profit or loss for the year. The property and equipment revaluation reserve included in equity is taken directly to retained earnings upon the realization of the gain on revaluation when the asset is written off or disposed of.

The carrying amount of property and equipment is reviewed for impairment when events or changes in circumstances indicate that the carrying amount may not be recoverable.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Property and equipment (continued)

Depreciation of an asset begins when it is available for use. Depreciation is calculated on a straight-line basis over the following estimated useful lives:

	<u>Years</u>
Buildings and structures	84-101
Computers and office equipment	3-8
Motor vehicles	5-9
Furniture and fixtures	2-33

The depreciation term for right-of-use assets is established in accordance with the budget cycle subject to the contractual terms to send a preliminary notice to the lessor of the intention to terminate the lease agreement. As at the end of the reporting period, useful lives of right-of-use assets were from 13 to 19 months.

The asset's residual values, useful lives and depreciation methods are reviewed, and adjusted, as appropriate, at the end of each reporting year. Costs related to repairs and renewals are charged when incurred and included in other operating expenses, unless they qualify for capitalization.

Intangible assets

Intangible assets include computer software and licenses for software and activities that must be licensed.

Intangible assets acquired separately are measured on initial recognition at cost, as adjusted for hyperinflation. Following initial recognition, intangible assets are carried at cost less any accumulated amortization and any accumulated impairment losses. Intangible assets have finite useful lives and are amortized over the periods of 1 to 20 years and assessed for impairment whenever there is an indication that the intangible asset may be impaired.

Intangible assets are amortized using the straight-line method based on the useful lives and standard service lives stipulated by contracts, patents, licenses and other documents.

Leases

i. Bank as a lessee

The Bank recognizes right-of-use assets and lease liabilities at the commencement of the lease for all leases, except for short-term leases. Initial cost of right-of-use assets is recognized in the amount of initial cost of lease liabilities adjusted for lease payments made as at or before the commencement date, increased by the initial direct costs incurred and the estimated costs that will arise from dismantling and relocation of the underlying asset, restoration of the underlying asset or the site on which it is located, less the lease incentives received.

Right-of-use assets

The Bank recognizes right-of-use assets at the lease commencement date (from the date when the use of the underlying asset has commenced). Subsequently, right-of-use assets are recognized less accumulated depreciation and accumulated impairment losses, if any. Initial cost of right-of-use assets is formed from the amount of the initially measured lease liability; any initial direct costs incurred by the lessee, less the amount of lease payments at the lease commencement date. Recognized right-of-use assets are depreciated on a straight-line basis over the shorter of the following: the date of expiration of the useful life of the right-of-use asset or the lease term expiration. The right-of-use asset is assessed for impairment.

Lease liability

The lease liability is measured at the present value of the lease payments that are not paid at that date. Lease payments include fixed payments less any lease incentives receivable, variable lease payments that depend on an index or a rate at the lease commencement day, and amounts expected to be paid by the Bank under residual value guarantees. Lease payments also include the exercise price of a purchase option reasonably certain to be exercised by the Bank and payments of penalties for terminating a lease if the lease term reflects the Bank exercising the option to terminate. Variable lease payments that do not depend on an index or a rate are expensed in the period to which they relate. In determining the present value of lease payments, the Bank uses an incremental borrowing rate at the date of the lease agreement. After the commencement date, the amount of lease liabilities is increased by the amount of accrued interest expense and decreased by the amount of lease payments actually made. In addition, the carrying amount of lease liabilities is remeasured if there is a modification, a change in the lease term or a change in the substance fixed lease payments. Where lease liabilities are remeasured in this way, the corresponding adjustment is made to the carrying amount of the right-of-use asset, or is recorded to profit or loss if the carrying amount of the right-of-use asset was previously reduced to zero. Where lease liabilities are partially disposed of when key terms of leases are changed, and in case of an early termination of the lease, the effect is recognized in profit or loss.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Leases (continued)

Short-term leases and leases of low-value assets

The Bank applies the recognition exemption to its short-term leases (i.e., those leases that have a lease term of less than 12 months from the commencement date and do not contain a lease renewal option and a purchase option). The Bank can also apply the practical expedient to leases with a low-value underlying asset (the cost of the underlying asset is less than USD 5,000 at the exchange rate effective at the reporting date).

For short-term leases and leases of low-value assets, the Bank recognizes lease payments under such leases as expenses on a straight-line basis over the lease term.

Significant judgments in determining the term of leases with a renewal option

The Bank determines the lease term as the lease period during which the Bank is reasonably certain that the lease relations will not be terminated, together with the periods in respect of which a lease renewal option is provided, if it is reasonably certain that the Bank will exercise this option, and the periods in respect of which a lease termination option is provided, if it is reasonably certain that the Bank will not exercise this option. The Bank considers all relevant facts and circumstances that give rise to an economic incentive to exercise or not to exercise the option. Subsequent to the lease commencement date, the Bank reassesses the lease term if there is either a significant event or a significant change in circumstances that are under the control of the Bank and affect the assessment of whether there is sufficient certainty that the option will be exercised or will not be exercised (for example, change of the business strategy).

ii. Finance – Bank as a lessor

At the inception or on modification of a contract that contains a lease component, the Bank allocates the consideration in the contract to each lease component on the basis of their relative stand-alone prices.

When the Bank acts as a lessor, it determines at lease inception whether each lease is a finance lease or an operating lease.

To classify each lease, the Bank makes an overall assessment of whether the lease transfers substantially all of the risks and rewards incidental to ownership of the underlying asset. If this is the case, then the lease is a finance lease; if not, then it is an operating lease. As part of this assessment, the Bank considers certain indicators such as whether the lease is for the major part of the economic life of the asset.

The Bank recognizes lease payments receivable in the amount equal to net investments in the lease from the lease commencement date. Finance income is based on a pattern reflecting a constant periodic rate of return on the net investments outstanding. Initial direct costs are included in the initial measurement of lease receivables.

The Bank applies the derecognition and impairment requirements in IFRS 9 to net investments in leases. In addition, the Bank regularly reviews the estimated unguaranteed residual values used in the calculation of the gross investment in leases to determine if changes are required.

Due to credit institutions, due to customers, debt securities issued and subordinated debt

Deposits, debt securities issued and subordinated liabilities are initially measured at fair value less the respective transaction costs and are subsequently measured at amortized cost using the effective interest rate method.

Contingent assets and liabilities

Contingent liabilities are not recognized in the statement of financial position but are disclosed unless the possibility of any outflow in settlement is remote. A contingent asset is not recognized in the statement of financial position but disclosed when an inflow of economic benefits is probable.

Financial guarantees and loan commitments

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 recognized at fair value and are subsequently measured at the higher of the amount of the allowance for ECL determined in accordance with IFRS 9 and the initially recognized amount less, as applicable, accumulated income recognized in accordance with IFRS 15.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Financial guarantees and loan commitments (continued)

The Bank has no issued loan commitments measured at FVPL.

For other loan commitments, the Bank recognizes an allowance for ECL.

Financial liabilities recognized with respect to the issued financial guarantees and loan commitments are included in other liabilities.

Provisions

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

Retirement and other employee benefit obligations

The Bank does not have any pension arrangements other than those provided by the state pension system of the Republic of Belarus, which requires current contributions by the employer calculated as a percentage of current gross salary payments. Such expenses are charged in the period when the related salaries are earned. In addition, the Bank has no significant post-employment benefits.

Share capital

Share capital

Ordinary shares are classified as equity. External costs directly attributable to the issue of new shares, other than in a business combination, are shown as a deduction from the proceeds in equity.

Non-cash contributions are included into the share capital at the fair value of contributed assets as at the contribution date.

Dividends

Dividends are recognized as a liability and deducted from equity at the reporting date only if they are declared before or on the reporting date. Dividends are disclosed as events after the reporting date when they are proposed before the reporting date or proposed or declared after the reporting date but before the financial statements are authorized for issue.

Interest and similar income and expense

Effective interest rate

Interest income and expense are recognized in profit or loss using the effective interest rate method. The effective interest rate is the rate that exactly discounts the estimated future cash payments or receipts over the expected life of the financial instrument to:

- ▶ The gross carrying amount of the financial asset; or
- ▶ The amortized cost of the financial liability.

When calculating the effective interest rate for financial instruments other than purchased or originated credit-impaired 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 credit-adjusted effective interest rate is calculated using estimated future cash flows including expected credit losses.

The calculation of the effective interest rate on financial instruments except for those measured at FVPL includes transaction costs and fees and amounts paid or received that are an integral part of the effective interest rate. Transaction costs include additional costs directly attributable to the acquisition or issue of the financial asset or financial liability.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Interest and similar income and expense (continued)

Amortized cost and gross carrying amount

The amortized cost of a financial asset or financial liability is the amount at which the financial asset or financial liability is measured on initial recognition minus the principal repayments, plus or minus the cumulative amortization using the effective interest rate method of any difference between that initial amount and the maturity amount and, for financial assets, adjusted for any credit loss allowance.

The gross carrying amount of a financial asset measured at amortized cost is the amortized cost of the financial asset before adjustment for the amount of the loss allowance.

Calculation of interest income and expense

The effective interest rate for a financial asset or financial liability is calculated at initial recognition of the financial asset or financial liability. When calculating interest income and expense, the effective interest rate is applied to the gross carrying amount of the asset (when the asset is not credit-impaired) or to the amortized cost of the liability. The effective interest rate is revised following regular reassessment of cash flows from floating-rate instruments in order to reflect changes in market interest rates. The effective interest rate is also revised to reflect adjustments related to fair value hedges at the date the amortization of the respective adjustment commences.

However, for financial assets that have become credit-impaired after initial recognition, interest income is calculated by applying the effective interest rate to the amortized cost of the financial asset. If the financial asset is no longer credit-impaired, the calculation of interest income is again based on the gross carrying amount.

For financial assets that are credit-impaired at initial recognition, interest income is calculated on the basis of the effective interest rate adjusted for credit risk applied to the amortized cost of the financial asset. Calculation of interest income for such assets is not based on the gross carrying amount even if the credit risk relevant to these assets will further decrease.

Presentation

Interest income calculated using the effective interest rate method and recorded in the statement of comprehensive income includes:

- ▶ Interest income on financial assets at amortized cost.
- ▶ Interest income on debt financial instruments at FVOCI.

Other interest income presented in the statement of comprehensive income includes interest income on net investments in finance leases.

Interest expense presented in the statement of comprehensive income includes interest expense on financial liabilities measured at amortized cost.

Fee and commission income and expense

Fee and commission income and expense that are an integral part of the effective interest rate on a financial asset or financial liability are included in the calculation of the effective interest rate.

Other fee and commission income, including account servicing fees, investment management fees and sales commissions, are recognized as the respective services are rendered. If a loan is unlikely to be provided to the borrower as part of a loan commitment, fees for the provision of the loan are recognized on a straight-line basis over the term of the loan commitment.

A contract with a customer that results in a recognized 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. In this case, 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 remaining part.

Other fee and commission expense primarily includes transaction support and service costs that are taken to expenses as the respective services are received.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

Net income from transactions with financial instruments measured at FVPL

Net income from transactions with financial instruments measured at FVPL for the period includes gains less losses related to assets and liabilities held for trading, and all fair values changes and foreign exchange differences.

Foreign currency translation

The financial statements are presented in Belarusian rubles, which is the Bank's functional and presentation currency. Transactions in foreign currencies are initially recorded in the functional currency, converted at the rate of exchange ruling at the date of the transaction. Monetary assets and liabilities denominated in foreign currencies are translated at the functional currency rate of exchange ruling at the reporting date. Gains and losses resulting from the translation of foreign currency transactions are recognized in the statement of comprehensive income as net gains from foreign currencies. Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rates as at the dates of the initial transactions. Non-monetary items measured at fair value in a foreign currency are translated using the exchange rates at the date when the fair value was determined.

Differences between the contractual exchange rate of a transaction in a foreign currency and the exchange rate of the National Bank on the date of the transaction are included in net gains from foreign currencies.

As at 31 December 2024 and 2023, the official exchange rates applied to prepare these financial statements were as follows:

	31 December 2024	31 December 2023
USD/BYN	3.4735	3.1775
EUR/BYN	3.6246	3.5363
RUB/BYN	0.0335	0.0350

The Bank applied for the first time certain new standards and amendments to the standards, which became effective for annual periods beginning on or after 1 January 2024. The Bank has not early adopted any standards, interpretations or amendments that have been issued but are not yet effective.

New standards, amendments and interpretations that became effective on 1 January 2024

Amendments to 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. In June 2022, the IASB decided to finalize the proposed amendments to IAS 1 published in the exposure draft *Non-current Liabilities with Covenants* with some modifications (the 2022 Amendments).

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.
- ▶ That an entity should disclose additional information if it classifies liabilities arising from loan arrangements as non-current when the entity's right to defer settlement of those liabilities is subject to the entity complying with covenants within 12 months.

The amendments are effective for annual periods beginning on or after 1 January 2024.

Amendments to IFRS 16 Leases

On 22 September 2022, the IASB issued amendments to IFRS 16 *Leases*, adding guidance on the subsequent measurement of assets and liabilities in sale and leaseback transactions that meet the criteria for a transfer of control of an asset in IFRS 15 *Revenue from Contracts with Customers*.

The amendments require a seller-lessee to measure the lease liability arising from a leaseback in a way that it does not recognize any amount of the gain or loss that relates to the right of use it retains.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

New standards, amendments and interpretations that became effective on 1 January 2024 (continued)

Entities should use IAS 8 *Accounting Policies, Changes in Accounting Estimates and Errors* to develop an accounting policy for determining how to measure lease payments for such transactions.

The amendments should be applied retrospectively in accordance with IAS 8 to sale and leaseback transactions entered into after the date of initial application of the amendments.

A seller-lessee shall apply the amendments for annual reporting periods beginning on or after 1 January 2024.

Amendments to IAS 7 Statement of Cash Flows and IFRS 7 Financial Instruments: Disclosures – Supplier Finance Arrangements

In May 2023, the IASB issued amendments to IAS 7 *Statement of Cash Flows* and IFRS 7 *Financial Instruments: Disclosures* that clarify the characteristics of supplier finance arrangements and require additional disclosures for such arrangements. The disclosure requirements in the amendments aim to assist users of financial statements in understanding the impact of supplier finance arrangements on an entity's liabilities, cash flows and exposure to liquidity risk. Transitional provisions in the amendments state that entities do not have to disclose certain comparative information for any reporting periods presented before the beginning of the annual reporting period in which the entity first applies those amendments, and certain information as of the beginning of the year otherwise required to be disclosed as of the beginning of the annual reporting period in which the entity first applies those amendments.

New standards and amendments issued but not yet adopted

The amendments and interpretations to the standards that were issued as at the date of issuance of the Bank's financial statements but are not mandatory and were not early adopted by the Bank in the financial statements for 2024 are disclosed below.

Standards not effective for the annual reporting period ended 31 December 2024	Effective for annual reporting periods beginning on or after
▶ Amendments to IAS 21 – <i>Lack of Exchangeability</i>	1 January 2025
▶ Amendments to IFRS 9 and IFRS 7 – <i>Amendments to the Classification and Measurement of Financial Instruments</i>	1 January 2026
▶ <i>Annual Improvements to IFRS Accounting Standards – Volume 11:</i>	
▶ <i>Cost method</i> (Amendments to IAS 7)	
▶ <i>Derecognition of lease liabilities</i> (Amendments to IFRS 9)	
▶ <i>Determination of a 'de facto agent'</i> (Amendments to IFRS 10)	
▶ <i>Disclosure of deferred difference between fair value and transaction price</i> (Amendments to <i>Guidance on implementing IFRS 7</i>)	
▶ <i>Gain or loss on derecognition</i> (Amendments to IFRS 7)	
▶ <i>Hedge accounting by a first-time adopter</i> (Amendments to IFRS 1)	
▶ <i>Introduction</i> (Amendments to <i>Guidance on implementing IFRS 7</i>)	
▶ <i>Credit risk disclosures</i> (Amendments to <i>Guidance on implementing IFRS 7</i>)	
▶ <i>Transaction price</i> (Amendments to IFRS 9)	1 January 2026
▶ IFRS 18 <i>Presentation and Disclosure in Financial Statements</i>	1 January 2027
▶ IFRS 19 <i>Subsidiaries without Public Accountability: Disclosures</i>	1 January 2027

These amendments and new standards are not expected to have a material impact on the Bank, except for IFRS 18 for which the Bank is currently in the process of analyzing its impact on the financial reporting.

(in thousands of Belarusian rubles)

3. Summary of accounting policies (continued)

New standards and amendments issued but not yet adopted (continued)

In April 2024, the IASB issued a new standard, IFRS 18 *Presentation and Disclosure in Financial Statements*, which will replace IAS 1 *Presentation of Financial Statements*. IFRS 18 introduces new requirements, the most important of which are:

- ▶ On the classification of income and expenses in the statement of profit or loss into three defined categories corresponding to operating, investing and financing activities. It also requires all entities to provide new defined subtotals, such as:
 - ▶ Operating profit or loss; and
 - ▶ Profit or loss before financing and income taxes.
- ▶ On the disclosure of information on management-defined performance measures in the financial statements, including reconciliation of those measures to the closest total or subtotal presented in the statement of profit or loss.
- ▶ On the presentation of aggregated and disaggregated financial information in the primary financial statements and in the notes.

IFRS 18 has also introduced limited changes to the statement of cash flows and certain other changes.

Entities shall apply IFRS 18 for annual reporting periods beginning on or after 1 January 2027. Earlier application is permitted.

4. Significant accounting judgments and estimates

In preparing these financial statements, management used professional judgments, assumptions and estimates affecting the application of the Bank's accounting policies and the amounts of reported assets and liabilities, income and expenses. Actual results could differ from those estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Adjustments to estimates are recognized in the reporting period in which the estimates are revised and in any future periods affected.

Judgments

Information about judgments, which were used in applying the accounting policies and had the most significant effect on the amounts recognized in the financial statements, is disclosed in the following notes:

- ▶ Classification of financial assets: assessment of the business model within which financial assets are held and assessment of whether the contractual terms of the financial asset provide for solely payments of principal and interest on the principal amount outstanding – Note 3.
- ▶ Establishment of criteria for assessing whether there has been a significant increase in credit risk on a financial asset since its initial recognition, determination of a methodology for including forward-looking information in the estimation of ECL, and selection and approval of models used to estimate ECL – Note 24.
- ▶ When assessing the loss given default (LGD) of individually significant borrowers, the Bank applies judgment on the term of selling real estate taken as collateral under a corresponding loan, which does not exceed 12 months.
- ▶ To determine levels of the fair value hierarchy, the Bank uses judgment to determine an active market. A description of valuation techniques and key input data on financial instruments measured at fair value are provided in Note 25.
- ▶ Revaluation of buildings and structures at fair value: the fair value is measured by independent appraisers using mainly the market approach that reflects the market value of real estate and takes into account information on transactions in the domestic real estate market.
- ▶ Operating leases: the Bank cannot readily determine the interest rate implicit in the lease, therefore, it uses an incremental borrowing rate (IBR) to measure lease liabilities. The incremental borrowing rate is the rate of interest that the Bank would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the right-of-use asset in a similar economic environment. The Bank estimates the IBR using observable inputs (such as market interest rates) when available and applies certain estimates. With respect to the lease term, the Bank determines whether there is reasonable certainty that the Bank will exercise options to extend and terminate the lease. Details are provided in Note 3.

(in thousands of Belarusian rubles)

4. Significant accounting judgments and estimates (continued)

Assumptions and estimation uncertainty

Information about the assumptions and estimation uncertainty, which give rise to a significant risk that they may cause a significant adjustment to the data in the financial statements for the year ended 31 December 2024, is disclosed in the following notes:

- ▶ Estimating ECL on financial instruments: determination of inputs for the ECL assessment model, including forward-looking information – Note 24.
- ▶ Impairment of financial instruments – Notes 5, 6, 7, 8 and 12.
- ▶ Fair value measurement of financial assets and liabilities – Note 25.

Changes in accounting estimates

In 2024, the Bank amended its model of measuring allowances and provisions under IFRS 9 *Financial Instruments* to reflect changes in the LGD calculation approach. These changes resulted in a decrease in the allowance by BYN 1,360 thousand (Note 7).

5. Cash and cash equivalents

Cash and cash equivalents comprise:

	31 December 2024	31 December 2023
Current accounts with the National Bank of the Republic of Belarus	478,877	359,043
Cash on hand	381,950	233,995
Current accounts with other credit institutions	283,862	239,665
Due from credit institutions up to 90 days	133,500	24,819
Reverse repurchase agreements with credit institutions up to 90 days	23,706	10,356
Total cash and cash equivalents	1,301,895	867,878
Less loss allowance	(80)	(172)
Cash and cash equivalents	1,301,815	867,706

As at 31 December 2024, current accounts with other credit institutions included BYN 173,847 thousand, placed with ten banks in the Republic of Belarus (31 December 2023: BYN 113,554 thousand, placed with eleven banks in the Republic of Belarus).

Movements in ECL allowances on current accounts with credit institutions and short-term deposits are presented below.

	Stage 1	Total 2024
Allowance for ECL at 1 January	172	172
New financial assets originated or purchased	80	80
Financial assets redeemed	(172)	(172)
Allowance for ECL at 31 December	80	80

The analysis of changes in ECL for the year ended 31 December 2023 is as follows:

	Stage 1	Total 2023
Allowance for ECL at 1 January	138	138
New financial assets originated or purchased	172	172
Financial assets redeemed	(138)	(138)
Allowance for ECL at 31 December	172	172

(in thousands of Belarusian rubles)

5. Cash and cash equivalents (continued)

Movements in allowances are associated with the following changes in the amount of funds placed on current accounts with credit institutions and the National Bank of the Republic of Belarus, and short-term deposits.

	Stage 1	Total 2024
Gross carrying amount at 1 January	633,883	633,883
New financial assets originated or purchased	919,945	919,945
Repayment	(633,883)	(633,883)
Gross carrying amount at 31 December	919,945	919,945

The above movements are presented to provide the rationale for the change in the amount of ECL during the year and do not reflect any movements if the Bank placed funds on current accounts with credit institutions and the National Bank of the Republic of Belarus, as well as short-term deposits during the year.

The analysis of changes in the gross carrying amount for the year ended 31 December 2023 is as follows:

	Stage 1	Total 2023
Gross carrying amount at 1 January	316,414	316,414
New financial assets originated or purchased	633,883	633,883
Repayment	(316,414)	(316,414)
Gross carrying amount at 31 December	633,883	633,883

6. Due from credit and financial institutions

Due from credit and financial institutions comprise:

	31 December 2024	31 December 2023
Mandatory cash balances with the National Bank of the Republic of Belarus	32,310	22,211
Restricted cash	19,259	4,360
Funds in settlements with international payment systems	12,417	42,195
Current precious metals accounts	6,597	–
Term deposits for more than 90 days	912	18,408
Total due from credit and financial institutions	71,495	87,174
Less loss allowance	(12,829)	(5,036)
Due from credit and financial institutions	58,666	82,138

Credit institutions are required to maintain a non-interest earning cash deposit (obligatory reserve) with the National Bank of the Republic of Belarus, the amount of which depends on the level of funds attracted by the credit institution. The Bank's ability to withdraw such a deposit is significantly restricted by the legislation.

As at 31 December 2024, 24% of term deposits placed for a period exceeding 90 days were represented by funds placed with two CIS credit institutions (2023: 91% placed with two CIS credit institutions).

As at 31 December 2024, restricted cash comprised BYN 19,259 thousand, which were temporarily frozen for transaction purposes and fully covered by allowances (2023: BYN 4,360 thousand).

(in thousands of Belarusian rubles)

6. Due from credit and financial institutions (continued)

The analysis of changes in ECL for the year ended 31 December 2024 is as follows:

	Stage 1	Stage 3	Total 2024
Allowance for ECL at 1 January	676	4,360	5,036
Transfers to Stage 3	—	—	—
Net change in loss allowance	266	9,843	10,109
New financial assets originated or purchased	3	1,072	1,075
Derecognized financial assets	(2)	—	(2)
Write-offs	—	(4,360)	(4,360)
Changes in foreign exchange rates and other movements	3	968	971
Allowance for ECL at 31 December	946	11,883	12,829

The above movements are presented to provide the rationale for the change in the amount of ECL during the year and do not reflect any movements if the Bank placed funds with credit institutions and the National Bank of the Republic of Belarus during the year.

The analysis of changes in ECL for the year ended 31 December 2023 is as follows:

	Stage 1	Stage 3	Total 2023
Allowance for ECL at 1 January	446	3,807	4,253
Net change in loss allowance	226	—	226
Derecognized financial assets	—	(61)	(61)
Changes in foreign exchange rates and other movements	4	614	618
Allowance for ECL at 31 December	676	4,360	5,036

The analysis of changes in the gross carrying amount for the year ended 31 December 2024 is as follows:

	Stage 1	Stage 3	Total 2024
Debt at 1 January	82,814	4,360	87,174
Transfers to Stage 3	(18,156)	18,156	—
Increase in gross carrying amount or initial recognition of financial instruments	34,890	—	34,890
Decrease in gross carrying amount or derecognition of financial instruments	(47,405)	—	(47,405)
Write-offs	—	(4,360)	(4,360)
Changes in foreign exchange rates and other movements	94	1,102	1,196
Debt at 31 December	52,237	19,258	71,495

The analysis of changes in the gross carrying amount for the year ended 31 December 2023 is as follows:

	Stage 1	Stage 3	Total 2023
Debt at 1 January	68,294	3,807	72,101
Increase in gross carrying amount or initial recognition of financial instruments	51,387	—	51,387
Decrease in gross carrying amount or derecognition of financial instruments	(39,156)	(61)	(39,217)
Changes in foreign exchange rates and other movements	2,289	614	2,903
Debt at 31 December	82,814	4,360	87,174

(in thousands of Belarusian rubles)

7. Loans to customers

Loans to customers comprise:

	31 December 2024	31 December 2023
Loans to legal entities	1,555,745	1,417,718
Loans to individuals	1,084,138	822,904
Finance leases	236,543	146,136
Total loans to customers	2,876,426	2,386,758
Less loss allowance	(47,519)	(48,478)
Loans to customers	2,828,907	2,338,280

The Bank measures receivables from individuals who are founders (participants, owners) of legal entities within the framework of special credit products as loans to legal entities. As at 31 December 2024, the gross carrying amount of such loans amounted to BYN 62 thousand (31 December 2023: BYN 74 thousand).

The analysis of changes in ECL on loans to legal entities and individuals for the year ended 31 December 2024 is presented below. The movements are presented to provide the rationale for the change in the amount of ECL during the year and do not reflect any movements if the debt was originated and settled during the year.

	Stage 1	Stage 2	Stage 3	POCI	Total 2024
Allowance for ECL on loans to individuals					
Balance at 1 January	6,505	1,368	8,860	–	16,733
Transfers to Stage 1	201	(130)	(71)	–	–
Transfers to Stage 2	(54)	691	(637)	–	–
Transfers to Stage 3	(510)	(1,050)	1,560	–	–
Change in allowance related to change in impairment stages	(132)	441	5,915	–	6,224
Change in allowance related to change in assessment of qualitative parameters	(281)	(17)	2,167	–	1,869
New financial assets originated or purchased	4,487	–	–	–	4,487
Change in allowance related to an increase in outstanding loans issued	109	42	308	–	459
Derecognized financial assets	(1,636)	(482)	(4,623)	–	(6,741)
Write-offs	–	–	(2,416)	–	(2,416)
Unwinding of the ECL present value discount	–	–	1,407	–	1,407
Changes in models and inputs	34	–	–	–	34
Allowance for ECL on loans to individuals at 31 December	8,723	863	12,470	–	22,056

	Stage 1	Stage 2	Stage 3	POCI	Total 2024
Allowance for ECL on loans to legal entities					
Balance at 1 January	5,700	273	25,376	–	31,349
Transfers to Stage 1	3,573	(31)	(3,542)	–	–
Transfers to Stage 2	(42)	1,537	(1,495)	–	–
Transfers to Stage 3	(114)	(25)	139	–	–
Change in allowance related to change in impairment stages	(3,569)	(886)	4,953	–	498
Change in allowance related to change in assessment of qualitative parameters	(1,623)	(71)	472	–	(1,222)
New financial assets originated or purchased	2,653	–	–	(39)	2,614
Change in allowance related to an increase in outstanding loans issued	130	1	222	–	353
Derecognized financial assets	(2,976)	(688)	(6,647)	–	(10,311)
Write-offs	–	–	(847)	–	(847)
Unwinding of the ECL present value discount	–	–	2,602	4	2,606
Changes in foreign exchange rates and other movements	438	43	843	–	1,324
Changes in models and inputs	(935)	508	(1,139)	–	(1,566)
Allowance for ECL on loans to legal entities at 31 December	3,235	661	20,937	(35)	24,798

(in thousands of Belarusian rubles)

7. Loans to customers (continued)

The analysis of changes in ECL on loans to legal entities and individuals for the year ended 31 December 2023 is presented below.

	Stage 1	Stage 2	Stage 3	Total 2023
Allowance for ECL on loans to individuals				
Balance at 1 January	5,244	846	9,462	15,552
Transfers to Stage 1	163	(68)	(95)	—
Transfers to Stage 2	(83)	575	(492)	—
Transfers to Stage 3	(281)	(663)	944	—
Change in allowance related to change in impairment stages	(84)	356	5,627	5,899
Change in allowance related to change in assessment of qualitative parameters	(523)	(4)	3,792	3,265
New financial assets originated or purchased	3,995	758	2,058	6,811
Derecognized financial assets	(1,926)	(432)	(3,227)	(5,585)
Write-offs	—	—	(9,209)	(9,209)
Allowance for ECL on loans to individuals at 31 December	6,505	1,368	8,860	16,733

	Stage 1	Stage 2	Stage 3	Total 2023
Allowance for ECL on loans to legal entities				
Balance at 1 January	5,844	1,288	16,724	23,856
Transfers to Stage 1	2,059	(518)	(1,541)	—
Transfers to Stage 2	(590)	880	(290)	—
Transfers to Stage 3	(559)	(251)	810	—
Change in allowance related to change in impairment stages	(1,690)	983	3,465	2,758
Change in allowance related to change in assessment of qualitative parameters	(213)	3	523	313
New financial assets originated or purchased	5,891	686	1,248	7,825
Derecognized financial assets	(3,569)	(629)	(6,186)	(10,384)
Write-offs	—	—	(450)	(450)
Changes in foreign exchange rates and other movements	680	147	2,035	2,862
Changes in models and inputs	(2,153)	(2,316)	9,038	4,569
Allowance for ECL on loans to legal entities at 31 December	5,700	273	25,376	31,349

Movements in ECL allowances are associated with the following changes in the gross carrying amount of loans to individuals:

	Stage 1	Stage 2	Stage 3	Total 2024
Outstanding loans to individuals				
Balance at 1 January	800,146	6,733	16,025	822,904
Transfers to Stage 1	639	(479)	(160)	—
Transfers to Stage 2	(3,373)	4,591	(1,218)	—
Transfers to Stage 3	(13,209)	(3,158)	16,367	—
New financial assets originated or purchased	469,589	—	—	469,589
Increase in outstanding loans issued	65,896	100	552	66,548
Derecognized financial assets	(261,416)	(3,056)	(8,015)	(272,487)
Write-offs	—	—	(2,416)	(2,416)
Unwinding of the ECL present value discount	—	—	—	—
Changes in foreign exchange rates and other movements	—	—	—	—
Outstanding loans to individuals at 31 December	1,058,272	4,731	21,135	1,084,138

All amounts outstanding on loans issued to individuals that were written off during the years ended 31 December 2024 and 31 December 2023 were still subject to enforcement procedures.

(in thousands of Belarusian rubles)

7. Loans to customers (continued)

Movements in ECL allowances are associated with the following changes in the gross carrying amount of loans to legal entities:

	<i>Stage 1</i>	<i>Stage 2</i>	<i>Stage 3</i>	<i>POCI</i>	<i>Total 2024</i>
Outstanding loans to legal entities					
Balance at 1 January	1,296,854	10,444	110,420	–	1,417,718
Transfers to Stage 1	26,334	(2,913)	(23,421)	–	–
Transfers to Stage 2	(4,258)	14,685	(10,427)	–	–
Transfers to Stage 3	(11,534)	(498)	12,032	–	–
New financial assets originated or purchased	743,771	–	–	381	744,152
Increase in outstanding loans issued	87,233	182	2,488	–	89,903
Derecognized financial assets	(707,477)	(8,231)	(15,008)	–	(730,716)
Write-offs	–	–	(847)	–	(847)
Unwinding of the ECL present value discount	–	–	–	–	–
Changes in foreign exchange rates and other movements	29,075	468	5,992	–	35,535
Changes in models and inputs	(41,580)	28,139	13,441	–	–
Outstanding loans to legal entities at 31 December	1,418,418	42,276	94,670	381	1,555,745

The analysis of changes in outstanding loans to individuals and legal entities for the year ended 31 December 2023 is presented below.

	<i>Stage 1</i>	<i>Stage 2</i>	<i>Stage 3</i>	<i>Total 2023</i>
Outstanding loans to individuals				
Balance at 1 January	585,832	3,306	17,358	606,496
Transfers to Stage 1	488	(299)	(189)	–
Transfers to Stage 2	(4,985)	5,889	(904)	–
Transfers to Stage 3	(10,737)	(2,307)	13,044	–
New financial assets originated or purchased	470,799	2,699	4,397	477,895
Derecognized financial assets	(241,257)	(2,555)	(8,475)	(252,287)
Write-offs	–	–	(9,209)	(9,209)
Changes in foreign exchange rates and other movements	6	–	3	9
Outstanding loans to individuals at 31 December	800,146	6,733	16,025	822,904

	<i>Stage 1</i>	<i>Stage 2</i>	<i>Stage 3</i>	<i>Total 2023</i>
Outstanding loans to legal entities				
Balance at 1 January	662,001	51,598	122,264	835,863
Transfers to Stage 1	60,215	(43,488)	(16,727)	–
Transfers to Stage 2	(8,855)	12,242	(3,387)	–
Transfers to Stage 3	(10,535)	(1,555)	12,090	–
New financial assets originated or purchased	931,226	3,460	2,500	937,186
Derecognized financial assets	(394,274)	(8,553)	(23,659)	(426,486)
Write-offs	–	–	(450)	(450)
Changes in foreign exchange rates and other movements	52,456	2,133	17,016	71,605
Changes in models and inputs	4,620	(5,393)	773	–
Outstanding loans to legal entities at 31 December	1,296,854	10,444	110,420	1,417,718

The loss allowance in the tables above includes expected credit losses on loan commitments to customers, such as credit facilities, credit cards, overdrafts, since for each loan agreement the Bank determines the amount of expected credit losses on the unclaimed component of loan commitments together with the already issued component of loan commitments.

(in thousands of Belarusian rubles)

7. Loans to customers (continued)

The amount and type of collateral required depends on the assessment of counterparty credit risk. Guidelines are implemented regarding the acceptability of types of collateral and valuation parameters.

The main types of collateral obtained are as follows:

- ▶ For securities lending and reverse repurchase transactions – cash or securities.
- ▶ For commercial lending – charges over real estate, property and equipment, inventory and receivables.
- ▶ For lending to purchase property and equipment – pledge of the purchased item of property and equipment.

The table below presents information on collateral for loans issued to individuals and legal entities. The data is based on the gross carrying amount of loans before allowances for ECL rather than on the fair value of collateral.

	31 December 2024	31 December 2023
Real estate	445,621	446,059
Property and equipment	337,528	318,510
Collateral under finance leases	236,543	145,902
Goods in turnover	413,061	352,174
Cash	5,679	23,156
Other	494,917	243,001
Unsecured	943,077	857,956
Loans to customers	2,876,426	2,386,758

The Bank monitors the market value of collateral, exercises control over its availability and condition and control over the sufficiency of inventory in line with concluded pledge agreements, requests additional collateral in accordance with the underlying agreement, and monitors changes in the market value of collateral obtained and/or other significant information in the course of estimating the allowance for impairment losses.

As at 31 December 2024, 80.2% of the loan portfolio of individuals amounting to BYN 869,187 thousand (31 December 2023: 93.8%, or BYN 774,327 thousand) is represented by unsecured loans.

As at 31 December 2024, loans secured by guarantee deposits amounted to BYN 5,679 thousand (31 December 2023: BYN 23,156 thousand).

Other types of collateral include bank guarantees of other Belarusian banks. As at 31 December 2024, loans secured by such guarantees amounted to BYN 32,515 thousand (31 December 2023: BYN 13,857 thousand). Other types of collateral also include property rights to residential premises under construction. As at 31 December 2024, loans secured by such guarantees amounted to BYN 187,557 thousand (31 December 2023: BYN 47,396 thousand).

In the absence of collateral or other credit enhancements, ECL on Stage 3 loans to customers as at 31 December 2024 and 2023 would have been higher by:

	31 December 2024	31 December 2023
Loans to legal entities	13,134	29,079
Loans to individuals	–	–
Finance leases	–	–
Total loans to customers	13,134	29,079

Concentration of loans to customers

As at 31 December 2024, the concentration of loans issued by the Bank to ten largest groups of borrowers amounted to BYN 581,211 thousand, or 20% of the gross loan portfolio (31 December 2023: BYN 543,945 thousand, or 23%). A loss allowance was created for these loans in the amount of BYN 8,970 thousand (31 December 2023: BYN 12,881 thousand).

(in thousands of Belarusian rubles)

7. Loans to customers (continued)**Concentration of loans to customers (continued)**

The loan portfolio structure by customer type is as follows:

	31 December 2024	31 December 2023
Private enterprises	1,760,082	1,528,020
Individuals	1,089,303	825,479
State organizations	27,041	33,259
Loans to customers	2,876,426	2,386,758

Amounts due from private enterprises include amounts due from private entrepreneurs and individuals who are founders (participants, owners) of legal entities to which loans under special credit products are extended.

As at 31 December 2024, the gross carrying amount of such loans was BYN 35,516 thousand (31 December 2023: BYN 47,334 thousand).

Loans to legal entities (including finance leases) are mainly issued to residents of the Republic of Belarus operating in the following industry sectors:

	31 December 2024	31 December 2023
Individuals	1,089,303	825,479
Trade	797,084	712,483
Manufacturing	299,107	214,249
Real estate	191,266	203,971
Financial services	214,752	186,169
Construction	110,059	91,445
Transportation	103,608	77,266
Agriculture	4,975	4,553
Other	66,272	71,143
Loans to customers	2,876,426	2,386,758

Loans to individuals (including finance leases) are also issued mainly to residents of the Republic of Belarus (the share of non-residents is 0.001% of the gross carrying amount as at 31 December 2024).

Finance lease receivables

The Bank is a lessor under finance leases. Subjects of the leases are motor vehicles and production equipment. The term of the lease is from 12 months to 60 months (and up to 84 months for motor vehicle leases with individuals).

Subject to agreement with the Bank, the lessee is entitled to early discharge its obligations under the lease in full provided that at least one year has passed from the date of the actual transfer of the leased asset to the lessee. Under the written consent of the Bank, the leased asset may be leased, subleased or transferred gratuitously provided that the legislation requirements are met. In case of early termination of the lease and withdrawal by the Bank (return by the lessee) of the leased asset, the lessee should apply to the relevant registration authority for introduction of amendments to the information on the state registration of the leased asset as required.

The analysis of finance lease receivables as at 31 December 2024 is as follows:

	Up to 1 year	From 1 year to 2 years	From 2 to 3 years	From 3 to 4 years	From 4 to 5 years	More than 5 years
Gross investment in finance leases	153,141	74,632	35,493	16,068	6,857	494
Unearned future finance income on finance lease	(26,733)	(13,974)	(6,265)	(2,537)	(575)	(58)
Net investment in finance leases	126,408	60,658	29,228	13,531	6,282	436

(in thousands of Belarusian rubles)

7. Loans to customers (continued)**Finance lease receivables (continued)**

The analysis of finance lease receivables as at 31 December 2023 is as follows:

	<i>Up to 1 year</i>	<i>From 1 year to 2 years</i>	<i>From 2 to 3 years</i>	<i>From 3 to 4 years</i>	<i>From 4 to 5 years</i>	<i>More than 5 years</i>
Gross investment in finance leases	95,585	47,009	20,720	7,764	3,454	3
Unearned future finance income on finance lease	(15,624)	(8,180)	(3,230)	(1,097)	(268)	–
Net investment in finance leases	79,961	38,829	17,490	6,667	3,186	3

Information on the charged loss allowance related to finance lease receivables for the year ended 31 December 2024 is as follows:

	<i>Stage 1</i>	<i>Stage 2</i>	<i>Stage 3</i>	<i>Total 2024</i>
Balance at 1 January	332	10	54	396
Transfers to Stage 1	2	(2)	–	–
Transfers to Stage 2	(8)	8	–	–
Transfers to Stage 3	(4)	(3)	7	–
Change in allowance related to change in impairment stages	(1)	14	57	70
Change in allowance related to change in assessment of qualitative parameters	(60)	(3)	5	(58)
New financial assets originated or purchased	268	–	–	268
Change in allowance related to an increase in outstanding loans issued	41	–	10	51
Derecognized financial assets	(182)	(6)	(51)	(239)
Unwinding of the ECL present value discount	–	–	1	1
Changes in foreign exchange rates and other movements	3	–	1	4
Changes in models and inputs	102	(7)	77	172
Balance at 31 December	493	11	161	665

Information on the charged loss allowance related to finance lease receivables for the year ended 31 December 2023 is as follows:

	<i>Stage 1</i>	<i>Stage 2</i>	<i>Stage 3</i>	<i>Total 2023</i>
Balance at 1 January	492	151	162	805
Transfers to Stage 1	93	(39)	(54)	–
Transfers to Stage 2	(5)	6	(1)	–
Transfers to Stage 3	(1)	(2)	3	–
Change in allowance related to change in impairment stages	(9)	17	1	9
Change in allowance related to change in assessment of qualitative parameters	(135)	(23)	(2)	(160)
New financial assets originated or purchased	348	4	5	357
Derecognized financial assets	(415)	(89)	(101)	(605)
Changes in foreign exchange rates and other movements	31	8	13	52
Changes in models and inputs	(67)	(23)	28	(62)
Balance at 31 December	332	10	54	396

(in thousands of Belarusian rubles)

7. Loans to customers (continued)**Finance lease receivables (continued)**

The analysis of changes in finance lease receivables for the year ended 31 December 2024 is as follows:

	Stage 1	Stage 2	Stage 3	Total 2024
Finance lease receivables				
Balance at 1 January	144,812	1,045	279	146,136
Transfers to Stage 1	437	(437)	–	–
Transfers to Stage 2	(3,578)	3,578	–	–
Transfers to Stage 3	(771)	(144)	915	–
New financial assets originated or purchased	172,083	–	–	172,083
Increase in outstanding loans issued	5,957	–	86	6,043
Derecognized financial assets	(86,804)	(1,330)	(639)	(88,773)
Unwinding of the ECL present value discount	–	–	–	–
Changes in foreign exchange rates and other movements	990	54	10	1,054
Changes in models and inputs	874	(1,152)	278	–
Finance lease receivables at 31 December	234,000	1,614	929	236,543

The analysis of changes in finance lease receivables for the year ended 31 December 2023 is as follows:

	Stage 1	Stage 2	Stage 3	Total 2023
Finance lease receivables				
Balance at 1 January	64,900	1,112	351	66,363
Transfers to Stage 1	347	(216)	(131)	–
Transfers to Stage 2	(836)	838	(2)	–
Transfers to Stage 3	(67)	(25)	92	–
New financial assets originated or purchased	124,224	79	37	124,340
Derecognized financial assets	(46,866)	(1,025)	(290)	(48,181)
Changes in foreign exchange rates and other movements	3,384	204	26	3,614
Changes in models and inputs	(274)	78	196	–
Finance lease receivables at 31 December	144,812	1,045	279	146,136

8. Investment securities

Investment securities comprise:

	31 December 2024	31 December 2023
Debt securities at FVOCI	96,882	49,088
Debt securities at amortized cost	50,729	39,405
Equity securities	1,465	1,243
Total investment securities	149,076	89,736
Less loss allowance	(1,393)	(1,073)
Investment securities	147,683	88,663

The Bank at its own discretion classified investments set out in the table below as equity securities measured at FVOCI. The Bank expects that these investments will be held in the long-term perspective in order to achieve the objectives set, for which reason the Bank reclassified them into securities measured at FVOCI.

(in thousands of Belarusian rubles)

8. Investment securities (continued)

Equity securities held by the Bank are as follows:

	<i>Fair value at 31 December 2024</i>	<i>Fair value at 31 December 2023</i>
OJSC NBFI SSIS	1,449	1,155
SWIFT	16	88
Total investments in equity securities at fair value through other comprehensive income	1,465	1,243

As at 31 December 2024, there were no assets pledged as collateral for funds raised from banks. As at 31 December 2023, assets pledged as collateral for funds raised from banks are presented in Note 13.

Debt securities measured at FVOCI but not pledged are presented by the following instruments:

	<i>31 December 2024</i>	<i>31 December 2023</i>
Bonds issued by republican governmental bodies	96,882	49,088
Total securities at fair value through other comprehensive income	96,882	49,088
<i>Including loss allowance</i>	<i>(2,208)</i>	<i>(1,212)</i>
Carrying amount – fair value of securities measured at fair value through other comprehensive income	96,882	49,088

Debt securities measured at amortized cost are presented by the following instruments:

	<i>31 December 2024</i>	<i>31 December 2023</i>
Bonds issued by republican governmental bodies	50,729	39,405
Total securities at amortized cost	50,729	39,405
Loss allowance	(1,393)	(1,073)
Carrying amount of securities at amortized cost	49,336	38,332

Movements in allowances for losses on securities at FVOCI for the year ended 31 December 2024 are as follows:

	<i>Stage 1</i>	<i>Total 2024</i>
Investment securities		
Balance at 1 January	1,212	1,212
New financial assets originated or purchased	1,931	1,931
Derecognized financial assets	(516)	(516)
Net change in allowance	(482)	(482)
Changes in foreign exchange rates and other movements	63	63
Balance at 31 December	2,208	2,208

The analysis of changes in ECL for the year ended 31 December 2023 is as follows:

	<i>Stage 1</i>	<i>Total 2023</i>
Investment securities		
Balance at 1 January	1,282	1,282
New financial assets originated or purchased	118	118
Derecognized financial assets	(187)	(187)
Net change in allowance	(190)	(190)
Changes in foreign exchange rates and other movements	189	189
Balance at 31 December	1,212	1,212

(in thousands of Belarusian rubles)

8. Investment securities (continued)

Movements in allowances for losses on securities at amortized cost for the year ended 31 December 2024 are as follows:

	Stage 1	Total 2024
Investment securities		
Balance at 1 January	1,073	1,073
New financial assets originated or purchased	386	386
Derecognized financial assets	(140)	(140)
Net change in allowance	(7)	(7)
Changes in foreign exchange rates and other movements	81	81
Balance at 31 December	1,393	1,393

The analysis of changes in ECL for the year ended 31 December 2023 is as follows:

	Stage 1	Total 2023
Investment securities		
Balance at 1 January	692	692
New financial assets originated or purchased	359	359
Derecognized financial assets	(89)	(89)
Net change in allowance	7	7
Changes in foreign exchange rates and other movements	104	104
Balance at 31 December	1,073	1,073

Changes in the loss allowance for securities at FVOCI are related to changes in debt on securities.

	Stage 1	Total 2024
Debt on securities at FVOCI		
Balance at 1 January	49,088	49,088
New financial assets originated or purchased	69,238	69,238
Net change in allowance	(31)	(31)
Derecognized financial assets	(23,695)	(23,695)
Changes in foreign exchange rates and other movements	2,282	2,282
Debt on securities at FVOCI at 31 December	96,882	96,882

Changes in the loss allowance for securities at amortized cost are related to changes in debt on securities.

	Stage 1	Total 2024
Debt on securities at amortized cost		
Balance at 1 January	39,405	39,405
New financial assets originated or purchased	13,908	13,908
Net change in allowance	(10)	(10)
Derecognized financial assets	(5,510)	(5,510)
Changes in foreign exchange rates and other movements	2,936	2,936
Debt on securities at amortized cost at 31 December	50,729	50,729

The above movements are presented to provide the rationale for the change in the amount of ECL during the year and do not reflect any movements if investment securities were sold and purchased during the year.

The analysis of changes in debt on investment securities at FVOCI for the year ended 31 December 2023 is as follows:

	Stage 1	Total 2023
Debt on securities at FVOCI		
Balance at 1 January	49,947	49,947
New financial assets originated or purchased	4,260	4,260
Net change in allowance	(2,504)	(2,504)
Derecognized financial assets	(9,666)	(9,666)
Changes in foreign exchange rates and other movements	7,051	7,051
Debt on securities at FVOCI at 31 December	49,088	49,088

(in thousands of Belarusian rubles)

8. Investment securities (continued)

The analysis of changes in debt on investment securities at amortized cost for the year ended 31 December 2023 is as follows:

	Stage 1	Total 2023
Debt on securities at amortized cost		
Balance at 1 January	29,588	29,588
New financial assets originated or purchased	13,465	13,465
Net change in allowance	(8)	(8)
Derecognized financial assets	(7,360)	(7,360)
Changes in foreign exchange rates and other movements	3,720	3,720
Debt on securities at amortized cost at 31 December	39,405	39,405

9. Property and equipment and right-of-use assets

Movements in property and equipment were as follows:

	Buildings and structures	Computers and office equipment	Motor vehicles	Furniture and fixtures	Construction in progress	Right-of-use assets	Total
Cost							
At 1 January 2024	30,794	32,241	682	19,412	390	8,958	92,477
Additions	5	5,517	132	4,042	462	10,941	21,099
Disposals	—	(1,249)	(112)	(1,306)	—	(8,771)	(11,438)
Contract modifications	—	—	—	—	—	241	241
Transfers	—	—	—	—	—	—	—
Revaluation	2,708	—	—	—	—	—	2,708
At 31 December 2024	33,507	36,509	702	22,148	852	11,369	105,087
Accumulated depreciation							
At 1 January 2024	(1,317)	(23,939)	(458)	(12,431)	—	(5,862)	(44,007)
Depreciation charge	(326)	(3,340)	(95)	(2,292)	—	(8,935)	(14,988)
Disposals	—	1,158	112	1,227	—	6,804	9,301
Transfers	—	—	—	—	—	—	—
Revaluation	(145)	—	—	—	—	—	(145)
At 31 December 2024	(1,788)	(26,121)	(441)	(13,496)	—	(7,993)	(49,839)
Net book value							
At 1 January 2024	29,477	8,302	224	6,981	390	3,096	48,470
At 31 December 2024	31,723	10,388	261	8,652	852	3,376	55,252
Cost							
At 1 January 2023	26,041	30,273	723	15,302	1,830	13,756	87,925
Additions	1	3,538	—	3,355	409	11,616	18,919
Disposals	—	(879)	(175)	(1,079)	—	(16,458)	(18,591)
Contract modifications	—	—	—	—	—	44	44
Transfers	572	(691)	134	1,834	(1,849)	—	—
Revaluation	4,180	—	—	—	—	—	4,180
At 31 December 2023	30,794	32,241	682	19,412	390	8,958	92,477
Accumulated depreciation							
At 1 January 2023	(1,406)	(22,837)	(482)	(10,207)	—	(8,311)	(43,243)
Depreciation charge	(281)	(2,518)	(80)	(2,039)	—	(8,193)	(13,111)
Disposals	—	761	104	1,004	—	10,642	12,511
Transfers	534	655	—	(1,189)	—	—	—
Revaluation	(164)	—	—	—	—	—	(164)
At 31 December 2023	(1,317)	(23,939)	(458)	(12,431)	—	(5,862)	(44,007)
Net book value							
At 1 January 2023	24,635	7,436	241	5,095	1,830	5,445	44,682
At 31 December 2023	29,477	8,302	224	6,981	390	3,096	48,470

(in thousands of Belarusian rubles)

9. Property and equipment and right-of-use assets (continued)

As at 31 December 2024 and 31 December 2023, the cost of fully depreciated property and equipment was BYN 23,814 thousand and BYN 21,519 thousand, respectively. As at 31 December 2024, an independent valuation of office premises was performed, which resulted in a revaluation increase of BYN 2,567 thousand (31 December 2023: a revaluation increase of BYN 4,016 thousand).

Right-of-use assets are represented by leases of premises for cash settlement centers.

If the office premises were measured using the cost model, the carrying amounts would be as follows:

	2024	2023
Cost	27,612	27,607
Accumulated depreciation and impairment	(1,643)	(1,153)
Net carrying amount	25,969	26,454

10. Intangible assets

Movements in intangible assets were as follows:

	31 December 2024	31 December 2023
Cost		
At 1 January	85,677	73,146
Additions	24,870	15,604
Disposals	(1,334)	(3,073)
At 31 December	109,213	85,677
Accumulated amortization		
At 1 January	(40,642)	(37,096)
Amortization charge	(6,452)	(6,616)
Amortization additions through business combinations	—	—
Disposals	1,301	3,070
At 31 December	(45,793)	(40,642)
Net book value		
At 1 January	45,035	36,050
At 31 December	63,420	45,035

As at 31 December 2024 and 2023, the cost of fully amortized intangible assets amounted to BYN 10,316 thousand and BYN 10,422 thousand, respectively.

The Bank's intangible assets are mainly represented by software used in banking activities (accounting systems, software for processing systems and business lines), and license agreements for its use.

11. Taxation

Income tax expense comprises the following:

	Total 2024	Total 2023
Current income tax expense	40,335	41,214
Deferred tax expense/(benefit) – origination and reversal of temporary differences	5,711	3,759
Income tax expense	46,046	44,973

Belarusian legal entities are obliged to calculate and pay taxes on an individual basis. The income tax rate for banks is set at 25% from 1 January 2015, except for income from operations with securities that are not accounted for when determining gross profit in accordance with the Tax Code of the Republic of Belarus.

As at 31 December 2024 and 2023, deferred tax assets and liabilities were calculated using the tax rate of 25%.

(in thousands of Belarusian rubles)

11. Taxation (continued)

The effective income tax rate differs from the statutory income tax rate. A reconciliation of the income tax expense based on the statutory rates with the actual income tax expense is as follows:

	Total 2024	Total 2023
Profit before tax	176,569	176,256
Statutory tax rate	25%	25%
Theoretical income tax expense at statutory rate	44,142	44,064
Tax effect of income from operations with securities exempt in accordance with legislation	(1,399)	(959)
Effect of non-deductible expenses	3,978	1,506
Other	(675)	362
Income tax expense	46,046	44,973

Deferred tax assets and liabilities as at 31 December and their movements for the respective years comprise:

	31 December 2023	Origination and reversal of temporary differences in the statement of profit or loss	Recognized in comprehensive income	31 December 2024
Tax effect of deductible temporary differences				
Investment securities	268	80	—	348
Property and equipment	1,410	760	(642)	1,528
Intangible assets	380	(31)	—	349
Due to customers	1,170	(605)	—	565
Tax effect of taxable temporary differences				
Cash and cash equivalents	(813)	720	—	(93)
Due from credit and financial institutions	(3,263)	(994)	—	(4,257)
Loans to customers	(23,411)	(3,177)	—	(26,588)
Investment securities	(2)	—	—	(2)
Other assets	(736)	(240)	—	(976)
Other liabilities	(2,279)	(2,224)	—	(4,503)
Subordinated debt	—	—	—	—
Deferred tax liabilities, net	(27,276)	(5,711)	(642)	(33,629)

	31 December 2022	Origination and reversal of temporary differences in the statement of profit or loss	Recognized in comprehensive income	31 December 2023
Tax effect of deductible temporary differences				
Investment securities	173	95	—	268
Property and equipment	1,263	879	(731)	1,410
Intangible assets	343	37	—	380
Due to customers	275	895	—	1,170
Other assets	—	—	—	—
Other liabilities	3,567	(3,567)	—	—
Tax effect of taxable temporary differences				
Cash and cash equivalents	(1,608)	795	—	(813)
Due from credit and financial institutions	(1,472)	(1,791)	—	(3,263)
Loans to customers	(24,446)	1,035	—	(23,411)
Investment securities	(2)	—	—	(2)
Other assets	(853)	117	—	(736)
Other liabilities	—	(2,279)	—	(2,279)
Subordinated debt	(25)	25	—	—
Deferred tax liabilities, net	(22,785)	(3,759)	(731)	(27,276)

(in thousands of Belarusian rubles)

12. Other assets and liabilities

Other assets comprise:

	31 December 2024	31 December 2023
Fee and commission income accrued	1,860	999
Accounts receivable	1,797	486
Amounts receivable on banking operations	812	88
Total financial assets	4,469	1,573
Less loss allowance for other financial assets	(172)	(96)
Other financial assets less allowance	4,297	1,477
Prepaid taxes other than income tax	22,608	16,751
Prepayments	19,910	15,287
Gold	4,953	2,983
Inventories	2,212	3,955
Assets held for sale	104	–
Total non-financial assets	49,787	38,976
Other assets	54,084	40,453

As at 31 December 2024, prepayments and other debtors include prepayment for property and equipment in the amount of BYN 17,158 thousand (2023: BYN 12,167 thousand).

Other liabilities comprise:

	31 December 2024	31 December 2023
Payables to suppliers (contractors)	8,695	9,402
Liabilities accrued on bonus points	3,004	3,390
Lease liability	2,003	1,955
Accrued fee and commission expense	293	1,019
Provisions for contingent liabilities (Note 19)	613	244
Amounts payable on banking operations	41	104
Payables on property and equipment and intangible assets	–	–
Other	616	518
Total financial liabilities	15,265	16,632
Taxes payable other than income tax	16,894	13,216
Deferred revenue on annual card service commissions	6,934	8,437
Amounts payable to employees	6,264	5,895
Payables to the Agency for Deposit Compensation	522	380
Other	30	62
Total non-financial liabilities	30,644	27,990
Other liabilities	45,909	44,622

Movements in the loss allowance for other financial assets for 2024 were as follows:

	Stage 1	Stage 2	Stage 3	Total 2024
Loss allowance for other assets at 1 January	–	–	96	96
Transfers to Stage 2	(90)	90	–	–
Transfers to Stage 3	–	(90)	90	–
Net change in loss allowance	–	–	54	54
New financial assets originated or purchased	90	–	–	90
Derecognized financial assets	–	–	–	–
Write-offs	–	–	(68)	(68)
Loss allowance for other assets at 31 December	–	–	172	172

(in thousands of Belarusian rubles)

12. Other assets and liabilities (continued)

Movements in the loss allowance for other financial assets for 2023 were as follows:

	Stage 1	Stage 2	Stage 3	Total 2023
Loss allowance for other assets at 1 January	–	–	428	428
Transfers to Stage 2	(411)	411	–	–
Transfers to Stage 3	–	(411)	411	–
Net change in loss allowance	–	–	6,925	6,925
New financial assets originated or purchased	411	–	–	411
Derecognized financial assets	–	–	–	–
Write-offs	–	–	(7,668)	(7,668)
Loss allowance for other assets at 31 December	–	–	96	96

The change in the loss allowance for other financial assets is due to the change in debt for which the allowance is charged. This change in debt for 2024 is as follows:

	Stage 1	Stage 2	Stage 3	Total 2024
Debt for other financial assets Balance at 1 January	1,402	–	171	1,573
Transfers to Stage 2	(216)	216	–	–
Transfers to Stage 3	–	(216)	216	–
New financial assets originated or purchased	3,718	–	–	3,718
Derecognized financial assets	(754)	–	–	(754)
Write-offs	–	–	(68)	(68)
Debt for other financial assets at 31 December	4,150	–	319	4,469

The change in debt, for which the allowance is charged, for 2023 is as follows:

	Stage 1	Stage 2	Stage 3	Total 2023
Debt for other financial assets Balance at 1 January	2,577	–	504	3081
Transfers to Stage 2	(7,335)	7,335	–	–
Transfers to Stage 3	–	(7,335)	7,335	–
New financial assets originated or purchased	6,247	–	–	6,247
Derecognized financial assets	(87)	–	–	(87)
Write-offs	–	–	(7,668)	(7,668)
Debt for other financial assets at 31 December	1,402	–	171	1,573

The above movements are presented to provide the rationale for the change in the amount of ECL during the year and do not reflect any movements if the debt on other financial assets was originated and repaid during the year.

The carrying amounts of lease liabilities and respective movements during the period are as follows:

	2024	2023
At 1 January	1,955	4,982
Effect from modification	241	44
Additions	10,941	11,616
Interest accrued	632	332
Early termination of agreements	(2,274)	(7,249)
Revaluation of foreign exchange contracts	(1)	48
Payments	(9,491)	(7,818)
At 31 December	2,003	1,955

In 2024, total cash outflow on the Bank's leases amounted to BYN 10,786 thousand (2023: BYN 8,985 thousand).

In 2024, the Bank also had non-cash additions of right-of-use assets and lease liabilities in the amount of BYN 11,182 thousand (2023: BYN 11,660 thousand).

(in thousands of Belarusian rubles)

13. Due to credit institutions

Due to credit institutions comprise:

	31 December 2024	31 December 2023
Term deposits and loans from resident banks	82,651	30,942
Current accounts	15,504	1,149
Term deposits and loans from non-resident banks	10,046	4,840
Repurchase agreements	—	70,000
Due to credit institutions	108,201	106,931

As at 31 December 2024, due to credit institutions of BYN 56,440 thousand (52%) were represented by amounts due to two banks.

As at 31 December 2023, due to credit institutions of BYN 70,027 thousand (65%) were represented by amounts due to one bank.

14. Due to customers

Due to customers comprise:

	31 December 2024	31 December 2023
Term deposits	1,750,634	1,321,187
Current accounts of customers	1,562,818	1,160,867
Due to customers	3,313,452	2,482,054
<i>Including cash held as security under letters of credit</i>	<i>24,016</i>	<i>—</i>
<i>Including cash held as security for the fulfillment of obligations</i>	<i>110,961</i>	<i>112,985</i>

Term deposits include deposits held by the Bank as security under irrevocable letters of credit. The Bank is obliged to return the collateral upon expiry of the respective letters of credit.

As at 31 December 2024, due to customers in the amount of BYN 696,713 thousand (21%) were represented by due to ten largest customers (2023: BYN 485,687 thousand (20%)) (Note 7).

Term deposits include deposits of individuals in the amount of BYN 402,793 thousand (2023: BYN 291,661 thousand).

Due to customers include accounts of the following types of customers:

	31 December 2024	31 December 2023
Private enterprises	1,925,103	1,347,841
Individuals	1,051,385	816,909
State organizations	336,964	317,304
Due to customers	3,313,452	2,482,054

(in thousands of Belarusian rubles)

14. Due to customers (continued)

The breakdown of customer accounts by economic sector is as follows:

	31 December 2024	31 December 2023
Individuals	1,051,385	816,909
Trade	582,449	384,589
Manufacturing	344,009	241,267
Construction	342,492	112,293
Real estate	162,679	107,803
Transportation	129,898	125,006
Non-profit organizations	110,860	149,790
Software development and information technologies	98,820	76,231
Entertainment	91,875	49,449
Financial services	63,717	40,550
Printing plant	55,158	30,352
Insurance	40,631	42,537
Individual entrepreneurs	32,702	39,183
Telecommunications	13,460	52,801
Research	10,512	77,337
Other	182,805	135,957
Due to customers	3,313,452	2,482,054

15. Debt securities issued

Debt securities issued are primarily placed through non-public sales and comprise the following:

	Currency	Maturity	Interest rate	31 December 2024	31 December 2023
Bonds (issue 34)	BYN	2025	10.25	32,602	30,217
Bonds (issue 35)	BYN	2024-2025	10	45,546	46,559
Bonds (issue 38)	BYN	2024-2025	10	55,027	54,296
Bonds (issue 39)	BYN	2024-2026	10	56,128	39,594
Debt securities issued				189,303	170,666

BYN-denominated interest-bearing bonds include 2019-2023 security issues.

As at 31 December 2024 and 2023, the Bank met obligations on securities issued in full and when they fell due.

16. Subordinated debt

Subordinated debt comprises the following:

	Date of attraction	Maturity	Interest rate	31 December 2024	31 December 2023
Subordinated loan 1 in USD	2010	2033	6.0%	15,978	14,617
Subordinated loan 2 in USD	2010	2033	6.0%	16,586	15,173
Subordinated loan 3 in USD	2015	2030	4.3%	6,947	6,355
Subordinated loan 4 in USD	2015	2025	6.0%	3,474	3,178
Subordinated loan 5 in USD	2022	2032	5.9%	17,367	15,886
Subordinated loan 6 in USD	2023	2033	6.0%	13,894	12,710
Subordinated debt				74,246	67,919

As at 31 December 2024 and 2023, the Bank met obligations on subordinated loans in full and when they fell due.

(in thousands of Belarusian rubles)

17. Equity

As at 31 December 2024, the authorized, issued and paid-in share capital of the Bank amounted to 168,201 ordinary shares (31 December 2023: 168,201 ordinary shares) with a nominal value of BYN 390.00 each. All the shares have the same nominal value and carry one vote. As at 31 December 2024, one (1) share was repurchased and held by the Bank.

There were no movements in shares outstanding, issued and fully paid during 2024. The table below shows the equity structure.

	<i>Number of ordinary shares</i>	<i>Total nominal value of ordinary shares</i>	<i>Adjustment for inflation</i>	<i>Total</i>
At 31 December 2024	168,201	65,598	44,828	110,426
At 31 December 2023	168,201	65,598	44,828	110,426

In 2024, no dividends were declared. In 2023, a part of accumulated profit was distributed as dividends. The amount of dividends was BYN 43,836 thousand (BYN 261 per share). There are no outstanding balances at the end of the reporting period.

In accordance with Belarusian legislation, dividends may only be distributed to the shareholders of the Bank from accumulated undistributed and unreserved earnings as shown in the Bank's financial statements prepared in accordance with the laws of the Republic of Belarus. As at 31 December 2024, the Bank's undistributed and unreserved earnings determined in accordance with the laws of the Republic of Belarus amounted to BYN 324,846 thousand (2023: BYN 203,223 thousand).

Nature and purpose of other reserves

Property and equipment revaluation reserve

The property and equipment revaluation reserve is used to record increases in the fair value of buildings and any decrease to the extent that such a decrease relates to an increase on the same asset previously recognized in equity.

Investment securities revaluation reserve

This reserve records changes in the fair value of investment securities at FVOCI.

18. Commitments and contingencies

Legal

In the ordinary course of business, the Bank is subject to legal actions and claims. Management believes that the ultimate liability, if any, arising from such actions or complaints will not have a material adverse effect on the Bank's future financial position or performance.

Taxation

The taxation system in the Republic of Belarus is characterized by complexity and frequent changes in regulations, official pronouncements and authorities' decisions, which are sometimes contradictory and subject to varying interpretation. In addition, there is no extensive court practice in the Republic of Belarus on tax issues.

Taxes are subject to review and investigation by a number of regulatory authorities, which are entitled to impose severe fines, penalties and interest charges. A tax year remains open for review by tax authorities during five subsequent calendar years. In some cases, this period can be unlimited.

Belarusian tax, currency and customs legislation is subject to varying interpretations and changes, which can occur frequently. Management's interpretation of such legislation as applied to the transactions and activity of the Bank may be challenged by the relevant authorities. As a result, significant additional taxes, penalties and interest may be assessed. Tax reviews may cover significant time periods.

Management believes that its interpretation of the relevant legislation is appropriate and that the Bank's tax, currency and customs positions will be sustained.

(in thousands of Belarusian rubles)

18. Commitments and contingencies (continued)**Insurance**

The Bank has no insurance coverage related to liabilities arising from errors or omissions. Liability insurance is not widely spread in the Republic of Belarus at present. Until the Bank obtains adequate insurance coverage, there is a risk that the loss or destruction of certain assets could have an adverse effect on the Bank's operations and financial position.

19. Credit-related commitments

As at 31 December 2024 and 2023, the Bank's credit-related commitments comprised the following:

	31 December 2024	31 December 2023
Credit-related commitments		
Loan commitments	1,196,494	985,516
Guarantees	267,642	123,741
Letters of credit	34,016	–
	1,498,152	1,109,257
Provisions for ECL	(613)	(244)
Commitments and contingencies	1,497,539	1,109,013

In accordance with the Bank's adopted accounting policies (Note 3), provisions for expected credit losses on loan commitments to customers, such as credit facilities, credit cards and overdrafts, are included in allowances on loans to customers (Note 7) since for each loan agreement the Bank determines the amount of expected credit losses on the unclaimed component of loan commitments together with the already issued component of loan commitments.

Movements in the provision for ECL on financial guarantee liabilities in 2024 are as follows:

	Stage 1	Stage 2	Total 2024
Provision at 1 January	243	1	244
Net change in loss provision	(168)	(1)	(169)
New financial assets originated or purchased	416	–	416
Derecognition	(50)	–	(50)
Changes in foreign exchange rates and other movements	2	–	2
Changes in models and inputs	170	–	170
Provision at 31 December	613	–	613

Movements in the ECL provision for financial guarantee liabilities and unsecured letters of credit in 2023 are as follows:

	Stage 1	Stage 2	Total 2023
Provision at 1 January	162	103	265
Net change in loss provision	(26)	(5)	(31)
New financial assets originated or purchased	149	–	149
Derecognition	(50)	(114)	(164)
Changes in foreign exchange rates and other movements	8	17	25
Provision at 31 December	243	1	244

*(in thousands of Belarusian rubles)***20. Net gains from foreign currencies**

	Total 2024	Total 2023
Dealing	68,163	49,153
Gains/(losses) from derivative financial instruments	3	2
Translation gains/(losses)	(883)	3,351
Net gains from foreign currencies	67,283	52,506

21. Net fee and commission income

	Total 2024	Total 2023
Commissions on transactions with payment cards	142,793	131,987
Settlement and cash operations	41,467	27,259
Documentary operations	1,353	1,839
Other	8,099	8,771
Fee and commission income	193,712	169,856
Commissions on transactions with payment cards	(89,857)	(79,847)
Commissions on banking operations	(10,547)	(9,575)
Documentary operations	(21)	(9)
Foreign exchange transactions	(847)	(620)
Other	(3,973)	(4,468)
Fee and commission expense	(105,245)	(94,519)
Net fee and commission income	88,467	75,337

The above fee and commission income represents revenue from contracts with customers in the scope of IFRS 15, by main type of fee and commission income.

Fee and commission income includes income in the amount of BYN 144,788 thousand (2023: BYN 134,151 thousand) and expense in the amount of BYN 90,119 thousand (2022: BYN 80,027 thousand) relating to financial assets and financial liabilities not measured at fair value through profit or loss. These amounts exclude amounts taken into account when determining the effective interest rate on such financial assets and financial liabilities.

(in thousands of Belarusian rubles)

21. Net fee and commission income (continued)**Performance obligations and revenue recognition policy**

Fee and commission income from contracts with customers is measured based on the consideration specified in the contract. The Bank recognizes revenue when it transfers control over a service to the customer.

The table below contains information about the types and timing of obligations that are to be fulfilled under contracts with customers, including significant payment terms and relevant accounting policies with respect to revenue recognition.

<i>Type of service</i>	<i>Nature and timing of performance obligations, including significant payment terms</i>	<i>Revenue recognition under IFRS 15</i>
Retail and corporate banking	<p>The Bank provides banking services to retail and corporate customers, including account maintenance, foreign currency operations, arrangement and issuance of credit cards and maintenance of the related accounts.</p> <p>Fees for account maintenance are collected by debiting the customer's account on a monthly basis. The Bank establishes bank service rates separately for retail and corporate customers on an annual basis.</p> <p>Fees for currency exchange operations, operations with foreign currency and provision of overdrafts are collected by debiting the customer's account at the time of the transaction.</p> <p>Fees for current maintenance are charged on a monthly basis at fixed rates that are annually reviewed by the Bank.</p>	<p>Fees for account maintenance are recognized over time, as services are rendered.</p> <p>Fees for conducting transactions are recognized at the moment when the relevant transaction is performed.</p>
Investment banking	<p>The Bank provides services connected with customer transactions with foreign currency and securities underwriting.</p> <p>Fees for conducting transactions and securities underwriting are charged at the moment when the transaction is performed.</p>	<p>Amounts due from customers as at 31 December are recognized as trade receivables. Fees for conducting transactions are recognized at the moment when the relevant transaction is performed.</p>

22. Other income

	<i>Total 2024</i>	<i>Total 2023</i>
Proceeds from debt previously written off	12,520	24,219
Gains from disposal of financial assets	3,953	–
Other income under contracts with partners	3,686	5,709
Fines and penalties received	1,145	1,141
Net gain/(loss) on sale of property and equipment and intangible assets	501	671
Rental income	111	1,034
Revaluation of property and equipment	–	1,091
Other	2,942	2,974
Total other income	24,858	36,839

(in thousands of Belarusian rubles)

23. Personnel and other operating expenses

Personnel and other operating expenses comprise:

	Total 2024	Total 2023
Salaries and bonuses	(71,169)	(60,637)
Social security contributions	(23,302)	(18,873)
Remuneration to members of the Supervisory Board	(2,351)	(2,256)
Other personnel expenses	(1,467)	(1,244)
Personnel expenses	(98,289)	(83,010)
Expenses on maintenance of banking software	(19,190)	(16,402)
Telecommunication services	(5,902)	(6,855)
Marketing and advertising	(5,116)	(5,969)
Utilities	(4,619)	(4,018)
Postal and cash collection services	(3,448)	(2,234)
Expenses on bank plastic cards	(3,021)	(4,575)
Taxes other than income tax	(2,897)	(2,317)
Professional services	(1,975)	(1,633)
Payments to the Agency for Deposit Compensation	(1,870)	(1,273)
Repair and maintenance of property and equipment	(1,372)	(1,159)
Lease of premises	(1,295)	(1,167)
Security expenses	(1,088)	(1,007)
Stationery and other office expenses	(940)	(1,041)
Expenses for cultural events	(580)	(280)
Repair and maintenance of vehicles and fuel expenses	(228)	(323)
Other expenses	(6,644)	(7,533)
Other operating expenses	(60,185)	(57,786)

For the year ended 31 December 2024, the Bank recognized expenses from short-term leases and leases of low-value assets of BYN 1,295 thousand (2023: BYN 1,167 thousand).

24. Risk management

Introduction

The Bank identifies key risks arising in the course of its activities and their sources, and manages these risks taking into account their materiality.

The Bank's risk management process involves identification, measurement (assessment), monitoring (control) and limitation of (decrease in) the risk level.

Risk management structure

The Bank's risk management system has a multilevel organizational structure, which includes:

- ▶ Level 1 – the Bank's collegial bodies performing risk management within their competencies determined by the law and local regulations of the Bank.
- ▶ Level 2 – the risk management officer performing risk management in accordance with competencies, duties, functions and responsibilities determined by the Risk Management Strategy.
- ▶ Level 3 – risk management units.
- ▶ Level 4 – internal control and internal audit departments.
- ▶ Level 5 – risk owners.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk management structure (continued)

Supervisory Board

The Supervisory Board of the Bank ensures the organization of the corporate governance of the Bank, including the systems it comprises, the avoidance of conflicts of interest in the Bank's activities and conditions for their occurrence, the adoption of local regulations to determine the risk management strategy, metrics of risk tolerance and risk appetite for significant risks, the strategy of organizing and implementing internal control in the Bank, the strategy and policy for corporate governance organization, the policy with respect to selecting candidates for the Supervisory Board and ensuring its continuity, the strategy of managing the Bank's non-performing assets, the investment policy, the credit policy for corporate lending, the policy regarding conflicts of interest, the compliance policy and other policies of the Bank in accordance with legislative acts.

Risk Committee

The Risk Committee is responsible for the matters related to:

- ▶ Reviewing reports of the Bank's risk management officer, including reports on the status of the risk management system and the Bank's risk level.
- ▶ Reviewing management reports on the Bank's risk profile.
- ▶ Assessing the effectiveness of the risk management system.
- ▶ Monitoring the risk tolerance and risk appetite for inherent, significant risks, other risk metrics of management reports addressing the Bank's risk profile, the level of major inherent, significant and macroeconomic risks (conditions).
- ▶ Other matters as instructed by the Supervisory Board or in accordance with the Bank's local regulations approved by the Supervisory Board and the General Meeting of Shareholders of the Bank.

Management Board

The main objective of the Management Board is the operating management of the Bank to ensure compliance of the Bank's activities with regulatory requirements and approved local regulations defining the Bank's development strategy and risk management strategy, its credit, investment, accounting and other policies, and to ensure the functioning of systems included in the Bank's corporate governance.

Financial Committee

The Financial Committee is primarily responsible for:

- ▶ Operational management of the Bank's financial assets and liabilities.
- ▶ Decision-making with regard to management of the Bank's liquidity risk, interest rate risk of the bank portfolio, market risks and risk of a decrease in financial stability.
- ▶ Maximization of the Bank's profitability with regard to risks.
- ▶ Drafting valid proposals and raising issues to be considered by the Management Board.

Credit Committee

The Credit Committee is responsible for discussing and making efficient decisions related to the Bank's active operations within its authority, performing preliminary analysis of the matters submitted for the consideration of the Management Board, developing recommendations for the Management Board and other collegial bodies of the Bank.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk management structure (continued)

The Bank's risk management officer

The functions of the Bank's risk management officer include:

- ▶ Organizing the risk management system of the Bank, including the preparation and execution of the work plan for the development of the risk management system.
- ▶ Coordinating activities of parties to the risk management process, monitoring the performance of risk management tasks and functions by the Bank's divisions.
- ▶ Ensuring the preparation and communication of risk reports to management bodies of the Bank, issuing analytical conclusions and recommendations based on the reported results.
- ▶ Ensuring the preparation of the Bank's local regulations on risk management, and making amendments and additions thereto.
- ▶ Ensuring due diligence of draft local regulations governing the Bank's business processes and products, which cover risk management issues, as well as amendments and additions thereto.
- ▶ Monitoring the effective use of the budget for the development of the risk management system.

Risk management units

The main objectives of risk management units are as follows:

- ▶ Information and analytical support of the Bank's management for decision-making purposes.
- ▶ Drafting and annual verification of local regulations governing risk management processes in the Bank.
- ▶ Monitoring (controlling) the risk level.
- ▶ Development of measures to limit (reduce) risks.

Internal control and internal audit departments

The main goal of the internal control department is to assess the sufficiency of control procedures based on the results of special-purpose reviews.

The main goal of the internal audit department is to assess the quality of the Bank's corporate governance, including the systems it comprises, based on the results of the audits performed.

Risk owners

Risk owners are primarily responsible for:

- ▶ Information and analytical support of the Bank's management for decision-making purposes.
- ▶ Contributing to the planning and implementation of the established planned and controlled indicators (indicators of volume, price, structure, risk limits).
- ▶ Development and implementation of measures to achieve strategic targets.
- ▶ Development and implementation of measures aimed at limiting the level of risks.
- ▶ Development and justification of the Bank's pricing and tariff policy.
- ▶ Contributing to the development of local regulations governing risk management processes in the Bank.
- ▶ Determination of the list of risks inherent in the business processes assigned to them.
- ▶ Making management decisions within the limits of their authority.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk management structure (continued)

Credit Risk Management Department (CRMD)

The CRMD is primarily responsible for:

- ▶ Monitoring and quality management of the corporate and retail loan portfolios in order to maintain a safe and acceptable level of credit risk that ensures maximum profitability for the Bank.
- ▶ Providing the Bank's management and shareholders with the necessary analytical and statistical information on the risk profile of the Bank's corporate and retail loan portfolios.
- ▶ Methodological support of the credit risk management process, assessment of customer creditworthiness of legal entities and individuals (including individual entrepreneurs).
- ▶ Calculation of allowances for expected credit losses on financial instruments of legal entities and individuals in accordance with IFRS 9 *Financial Instruments*.
- ▶ Raising the objectivity of judgments of the Bank's credit and other units involved in the preparation of documents so that authorized bodies/persons could make decisions on the approval (refusal) of credit transactions and/or amendments to existing credit transactions.

Other structural units

- ▶ Participate in planning and implementing the established planned and controlled indicators (indicators of volume, price, structure, risk limits).
- ▶ Make management decisions within the limits of their authority.

Risk measurement and reporting system

The Bank's risk management is based on requirements of the National Bank of the Republic of Belarus and the recommendations of the Basel Committee on Banking Supervision.

The Bank has developed a hierarchical system of local regulations, including high-level documents – the Risk Management Strategy and the Risk Management Policy, and local regulations on managing certain types of risks and establishing the organizational structure and distribution of risk management powers among the Bank's employees. These local regulations define risk management goals, objectives and principles and determine key risk indicators, levels of the Bank's tolerance to and risk appetite for inherent risks, methods to detect (identify), measure (assess), monitor (control) and limit (reduce) those risks, functions of structural units, and powers of the Bank's employees to manage inherent risks.

The Bank identifies the following risks as risks that are significant at this development stage and in the current economic environment:

- ▶ Strategic risk.
- ▶ Credit risk, including its subtype – country risk.
- ▶ Liquidity risk.
- ▶ Operational risk.
- ▶ Reputational risk.
- ▶ Market risk (including currency risk, commodity risk and interest rate risk of the trade portfolio).
- ▶ Interest rate risk of the bank portfolio.
- ▶ Concentration risk.
- ▶ Risk of a decrease in financial stability.

These types of risks have a permanent nature and make a significant share in the Bank's risk profile.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

Strategic risk is the risk of losses, including a loss of planned revenues, due to errors (deficiencies) as a result of erroneous/deficient decisions that define the Bank's development strategy (strategic management), without regard to the factors negatively affecting the Bank's activities, including as a result of an inappropriate choice of priority business activities, lack of resources required and organizational measures (management decisions).

The key risk management principles are monitoring of compliance with the main parameters and objectives determined by the Bank's Strategic Development Plan (the Strategy), factor analysis of the implementation of the Bank's Strategic Development Plan, analysis of macroeconomic conditions of the Bank's activities, adjustment of the Bank's Strategic Development Plan, where objectively necessary, or even change of the Bank's strategic objectives and goals.

Risk prevention measures include adherence to a given tolerance and appetite for strategic risk and other risks inherent in the Bank's activities (within acceptable limits), development of a risk management system, including a limit system for risks inherent in the Bank, including strategic risk, and availability of strategic projects aimed at developing the Bank's business and its infrastructure.

Loss recovery measures may include correction of the Bank's Strategic Development Plan / budget, adjustment of the Bank's activities based on the results of the analysis of the Bank's macroeconomic conditions, factor analysis of the Strategic Development Plan implementation, application of measures boosting the achievement of planned budget indicators and the implementation of the Strategic Development Plan and strategic projects.

Risk of a decrease in financial stability is the risk of a deficit of regulatory capital to cover losses from risks inherent in the Bank.

The key risk management principle is to maintain the actual capital ratios at the level acceptable for the Bank when achieving its goals within the regulatory limitations established by the National Bank of the Republic of Belarus.

Risk prevention measures are taken based on the results of a prospective factor analysis (forecast, stress testing) of changes in the level of regulatory capital adequacy. These measures may include slowing the growth of assets (off-balance sheet liabilities) exposed to credit risk, slowing the growth of the loan portfolio, management of the portfolio of assets (off-balance sheet liabilities) that give rise to more stringent capital level requirements, reducing the amount of market risks, improving the quality of the loan portfolio, and contributions to the Bank's share capital.

Measures to adjust the level of regulatory capital are determined based on the results of a retrospective factor analysis of regulatory capital changes. These measures may include a change in the size and/or structure of the loan portfolio and the amount of market risks, a change in the parameters of assets (off-balance sheet liabilities) to avoid more stringent capital level requirements, collection of bad debt, changes in the share or regulatory capital of the Bank.

The Bank's Supervisory Board has approved the plan for ensuring financial stability with respect to capital adequacy ratios in case of occurrence of risks that may result in the loss of stability. The Bank regularly tests the efficiency of the plan for ensuring the financial stability, revises and updates it to reflect changes in the bank's risk profile.

Credit risk is the risk that the Bank will incur a loss or will not receive expected income because its counterparty fails to discharge its contractual or statutory financial or other property obligations to the Bank, or discharges them in an untimely fashion or not in full.

Country risk (a subtype of credit risk) is the risk that the Bank may incur losses or fail to receive the expected income as a result of foreign counterparties (legal entities or individuals) failing to meet their obligations due to economic, political and social changes or because the currency of a monetary liability may be unavailable to a counterparty due to the specifics of the national legislation (irrespective of the counterparty's financial position).

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

Key risk management principles are as follows:

- ▶ In case of secured lending, the financial reliability of a client is assessed by the degree of its creditworthiness.
- ▶ In case of unsecured lending, the financial reliability of a client is assessed by the degree of its solvency.
- ▶ The larger the loan and the longer its term, the stricter the financial reliability and collateral requirements.
- ▶ Where loans are extended to finance a customer's current activities, it is possible to apply a limit-based approach, and the reliability of investment in non-current assets is evaluated on an individual basis.
- ▶ The reliability of investment in large loan transactions is evaluated on an individual basis according to the underwriter's conclusion on the financial reliability of the client. Mass and small standard loan transactions can be evaluated based on the results of scoring of the creditworthiness of the borrower or in accordance with fully formalized rules of analyzing the borrower's creditworthiness and making decisions on extending credit (product delivery) with regard to certain banking products.
- ▶ Testing of currency risk tolerance is an obligatory element of categorizing the financial stability of debtors (assigning the Bank's internal rating).
- ▶ The Bank's Credit Policy in the field of corporate lending is approved and amended by the decision of the Bank's Supervisory Board.
- ▶ Amendments to local regulations, which govern the categorization of debtors, maintenance of groups of related debtors, establishment of a global credit limit for debtors and financial monitoring of debtors, are introduced and subsequently reported to the Risk Committee of the Bank's Supervisory Board.
- ▶ Changes in approaches (algorithms, methods) used by the Bank to assess the creditworthiness (solvency) of corporate debtors, vulnerability to currency risk factors, and changes in approaches to assessing and monitoring the sufficiency of collateral should be agreed with the Bank's Risk Management Officer and in cases specified by the Management Board in local regulations.
- ▶ Changes in approaches (algorithms, methods) used by the Bank to assess the creditworthiness (solvency) of individual debtors should be agreed with the Bank's Risk Management Officer and in cases specified by the Management Board in local regulations.

The key principle of managing country risk (a subtype of credit risk) is to maintain the actual maximum risk concentration ratio at the level acceptable for the Bank to achieve its goals and within the regulatory limit established by the National Bank of the Republic of Belarus.

Risk prevention measures include:

- ▶ Revision of limits set in the Bank's Credit Policy as part of an annual validation process, taking into account the Bank's Development Strategy, identified and expected risks.
- ▶ Definition of standard requirements for borrowers' financial reliability, systems of limits and, if necessary, imposing stricter requirements.
- ▶ Credit risk management through a system of risk requirements formalized for certain banking products.
- ▶ Determination of the minimum interest rate on credit products, given the risk margin.
- ▶ Testing of new credit products in small volumes during a certain testing period and making subsequent decisions on whether the new products will be further used.
- ▶ Arrangement of lending processes and support of credit transactions based on assessments of financial reliability of debtors, determination of currency risk tolerance (categorization).
- ▶ Adoption of measures to prevent the occurrence of bad debt.

Potential loss recovery measures include:

- ▶ Debt restructuring.
- ▶ Determination of standard requirements for the performance of obligations under loan transactions and, if necessary, imposing stricter requirements.
- ▶ Pre-trial and judicial debt collection.
- ▶ Sale of claims to debtors.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

Liquidity risk is the risk that the Bank will incur losses or will not receive expected income due to inability to meet its obligations in full when they fall due, and also as a result of mismatch between financial assets and financial liabilities of the Bank (including, due to untimely fulfillment of financial liabilities by one or several counterparties of the Bank) and/or unforeseen need for immediate and simultaneous discharge of financial liabilities by the Bank.

Key risk management principles are as follows:

- ▶ Implementation of a liquidity accumulation strategy.
- ▶ Classification of liquid assets into those of the first or second priority. Determination of the required sufficiency of liquid assets in the normal course of the Bank's operation (liquidity of the first priority) and in case of emergency (liquidity of the first and the second priority). Assessment of the actual sufficiency of liquidity.
- ▶ Division of the Bank's liquidity management into operational management and strategic management. Operational management involves a set of rules and regulations ensuring sufficient liquidity for the short-term period (as a rule, over a horizon of up to 3 months), which should be linked to the strategic decisions taken on liquidity management. Strategic management involves a set of rules and regulations ensuring sufficient liquidity for a long-term period.
- ▶ Structural segregation of operational and strategic liquidity management functions.
- ▶ Development of a system of limits based on the implemented model of liquidity risk analysis.

Risk prevention measures include:

- ▶ Accumulation and maintenance of liquid assets at the required level.
- ▶ Management of reputational risk (shaping the image of a bank with high financial stability, capable of providing quality services and generating exclusive and marketable products).
- ▶ Creation of loan portfolios in proportion to movements in the resource base and its condition (for example, limiting the growth rate of loan portfolios to a level that does not outpace the growth of the resource base).
- ▶ Ensuring an adequate structure and diversification of funding sources.
- ▶ Improvement of analysis models.
- ▶ GAP position management.
- ▶ Sale of low-liquid (non-current) assets.
- ▶ Hedging.

Measures to recover the necessary liquidity, in the event of its loss, are determined in accordance with the local regulations, plans for ensuring financial stability, including the plan for counteracting crisis situations and recovering the Bank's liquidity. The Bank regularly tests the efficiency of the plan for counteracting crisis situations and recovering the Bank's liquidity, revises and updates it to reflect changes in the Bank's risk profile.

Interest rate risk of the bank portfolio is the risk that the Bank will incur losses or will not receive expected income from changes in the amount of on- and off-balance sheet items not included in the trade portfolio as a result of changes in interest rates.

The key risk management principle is to optimize the ratio of assets and liabilities by term and amount taking into account their sensitivity to changes in interest rates. This principle results in the possibility of increasing the interest rate risk of the bank portfolio in order to reduce liquidity risk and, vice versa, reducing excess liquidity (increasing liquidity risk) in order to reduce the interest rate risk of the bank portfolio.

Risk prevention measures include:

- ▶ Management of interest rate GAP positions.
- ▶ Development of a system of limits on the interest rate risk of the bank portfolio based on the implemented model of analysis of the interest rate risk of the bank portfolio.
- ▶ Contributing to desired changes in the asset portfolio and the resource base through the transfer pricing system.
- ▶ Drafting of loan and deposit agreements providing for reallocation of risk among counterparties and clients.
- ▶ Forecasting changes in interest rates on the market and adoption of measures that allow the Bank to adapt to changes in its business environment with minimum losses.
- ▶ Reallocation of available assets among securities, interbank loans and funds on correspondent accounts.
- ▶ Sale of low-liquid (non-current) assets.
- ▶ Hedging.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

Measures to regulate (adjust) the amount of risk include revising the risk limit policy, improving analysis models, adjusting the pricing policy, attracting long-term interbank loans at an appropriate cost, restructuring liabilities, and hedging.

Operational risk is the risk of losses and/or additional costs incurred by the Bank or failure to receive planned income as a result of non-compliance of the Bank's established processes and procedures for banking transactions and other activities with legislative acts, local regulations and business practice or violation by the Bank's employees of those processes and procedures, incompetence or mistakes of the Bank's employees, non-compliance or failure of the systems used by the Bank, including informational systems, as well as a result of external factors.

The key risk management principles are to ensure the efficient operation of the system for identification and classification of operational incidents, determination (assessment) of losses and lost profit, prevention/minimization of losses and/or cases of shortfalls in planned income, reduction of other development indicators due to operational incidents, maintenance of the risk accepted by the Bank at the level of tolerance and risk-appetite indicators established by the Supervisory Board.

Measures to prevent operational risk in the context of its main sources are as follows:

- ▶ Timely update of software and information technologies.
- ▶ Testing of systems.
- ▶ Creation of backup communication lines and other necessary backup systems, availability of autonomous power supplies.
- ▶ Improvement of the fraud-scoring system.
- ▶ Ensuring the effectiveness of the risk management system, taking into account the characteristics of risk sources.
- ▶ Determination of priority information technologies and their integration into the strategic supervision process.
- ▶ Formalization of methods for selecting and controlling the implementation of IT tools and systems (CRM, ERP, RPA, Core System, etc.) into the Bank's business processes.
- ▶ Ensuring cyber resilience and cyber security, determination and documentation in the Risk Management Strategy of critical objects of information infrastructure, cyber threats typical for the Bank, current state of cyber security in the Bank and the ability to counter cyber threats, as well as measures to overcome the existing deficiencies and ways to improve cyber risk management.
- ▶ Development of and control over the implementation by the Bank's management of measures to develop personnel competencies and skills in view of the ongoing changes (for example, in the context of changes in the IT landscape, digital transformation tasks, it would be appropriate to develop and carry out a plan to increase the Digital IQ of the Bank's employees).
- ▶ Regulation of information resource management taking into account the Bank's risks (for example, establishing a reasonable balance between transparency and security of the information system based on the risk assessment; implementation of a classification of the Bank's information resources (DBMS, etc.) with ratings allocated to such systems depending on the amount of risks as a result of which the Bank may face data leakage from these systems; development and implementation of regulations for information processing with regard to each information resource group).
- ▶ Formation of an integral system for the implementation of systematic monitoring of and independent control over the established limits and determination of powers to check compliance therewith, with the system possibly covering all operations carried out in the course of banking activities, which are associated with the manifestation of risks, including operational risk.
- ▶ Creation of an effective organizational structure of the Bank that takes into account the segregation of functions, responsibilities and powers of employees in the course of transactions (operations).
- ▶ Regulation of operations.
- ▶ Development of agreement templates.
- ▶ Improvement and regulation of processes, systems, technologies, procedures, rules, etc.
- ▶ Availability and update of the Bank's action plans in case of occurrence of risks that may result in the suspended operation of the Bank or loss of financial stability in order to ensure the ability of the Bank to continue as a going concern and its financial stability, respectively, which are developed in accordance with the Bank's Business Continuity and Financial Stability Policy.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

- ▶ Development of systems for automation of banking operations, including automation of homogeneous recurring actions and information security systems.
- ▶ Reduction in the financial impact of operational risk through insurance.
- ▶ Elimination of certain activities (separate operations or transactions) exposed to operational risk.
- ▶ Reduction in the level of certain types of operational risk by transferring risk or its part to third parties (outsourcing) provided that outsourcing risks are managed effectively.
- ▶ Control and audit.
- ▶ Recruitment of highly qualified specialists, certification, formation of a talent pool.
- ▶ Boosting employee motivation.
- ▶ Improvement of employees' knowledge in various areas of activity, including promotion of the risk culture.
- ▶ Study by all the Bank's employees of the fundamentals and principles of the Bank's information security, including cyber risk, and provision of new knowledge.

Measures to recover losses from operational incidents are determined individually in each specific case depending on the sources of operational risk and the business process where they occurred.

Reputational risk is the risk of the Bank's losses or non-receipt of planned income as a result of a narrowed customer base and reduction of other development indicators as a result of a negative public opinion of the Bank's financial stability, quality of its services or nature of its business in general.

The key risk management principles are to ensure the financial stability of the Bank, the quality of its services at a level not lower than the main competitors' level, and continuous quality improvement.

Risk prevention measures include:

- ▶ Unconditional maintenance of the Bank's financial stability.
- ▶ Ensuring the proper quality of services provided.
- ▶ Ensuring the transparency of the Bank's activities.
- ▶ Ensuring the information security of the Bank.
- ▶ Establishment, development and maintenance of correspondent relations, inter alia, with foreign financial institutions, including (but not limited to) the expansion of the network of correspondents and the list of currencies for settlements.
- ▶ Compliance with the legislation of the Republic of Belarus on issues of protection of personal data, bank secrets or other legally protected secrets, prevention of money laundering, financing of terrorism and proliferation of weapons of mass destruction (assessment of customer risk in the process of financial monitoring), effective management of compliance risk and corruption risk in accordance with the rules established in the Bank's local regulations.
- ▶ Customer servicing in accordance with service standards.
- ▶ Timely consideration and response to customer complaints and requests.
- ▶ Interaction with mass media through:
 - ▶ Addresses of the Bank's management and its representatives.
 - ▶ Periodic publications of financial statements, information on the Bank, its products and services.
 - ▶ Support of the Bank's website as a source of relevant and accurate information about the Bank and its activities.
 - ▶ Advertising campaigns and events.
 - ▶ Charity and social promotion events, campaigns and programs.
 - ▶ More frequent positive newsbreaks about the Bank's activities in mass media.

Measures to recover losses resulting from reputational risk include measures aimed at recovery of the Bank's financial sustainability and stability, correction of errors and deficiencies in customer service, publication of rebuttals in cases of negative PR and legal action.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

Currency risk is the risk that the Bank will incur losses or will not receive expected income from changes in the value of on- and off-balance sheet items denominated in foreign currency as a result of changes in foreign currency rates. The Bank's positions in precious metals in the form of bank bars, ingots and coins revalued as accounting prices change in accordance with the Bank's accounting policies are exposed to currency risk.

The key risk management principle is the constant maintenance of a currency position in line with the approved limits based on standards for safe operation established by the National Bank of the Republic of Belarus.

Risk prevention measures include:

- ▶ Adjusting the open currency position.
- ▶ Maintenance of an open long currency position to hedge currency risk associated with the necessity to regulate the volume of special reserves in Belarusian rubles on assets denominated in foreign currency in case of the ruble devaluation against the foreign currency with the largest share in the Bank's total assets.
- ▶ Analyzing options for fair distribution of risks when drafting loan and deposit agreements.
- ▶ Stress-testing of currency risk in the process of categorizing of debtors (assigning of the Bank's internal rating).
- ▶ Currency risk limitation.
- ▶ Reallocation of risk.
- ▶ Risk hedging.

Measures to regulate (adjust) the amount of risk include revising the risk limit policy and improving analysis models.

Commodity risk is the risk that the Bank will incur losses or will not receive expected income from changes in commodity prices.

The key risk management principles include:

- ▶ Avoidance of risk to the maximum possible extent.
- ▶ Monitoring and forecast of market conditions by commodity item in the Bank's portfolio.

Risk prevention measures include:

- ▶ Modeling and estimation of possible losses due to changes in the market price and the ownership cost of positions in the commodity portfolio.
- ▶ Risk limit management.
- ▶ Development of a methodology to manage the risk throughout the "product life cycle", starting with the processes of accepting collateral and releasing own property and equipment up to the sale of goods.
- ▶ Tightening of requirements for the financial reliability of borrowers and the quality of collateral under loan transactions.
- ▶ Decisions on the immediate sale of property at a reduced price.
- ▶ Decisions on changing the requirements for the amount of a minimum sufficient discount to the value of property when taken as repayment of the debt.
- ▶ Decisions on the preparation of a list of goods (groups of goods) that cannot be accepted by the Bank as repayment of debts.

Measures to regulate (adjust) the amount of the risk are determined in accordance with the strategy of immediate sale or retention until the occurrence of a certain event adopted in relation to a particular commodity item.

Interest rate risk of the trade portfolio is the risk that the Bank will incur losses or will not receive expected income from changes in the amount of on- and off-balance sheet items included in the trade portfolio as a result of changes in interest rates.

The main principle of risk management is to ensure that positions of the trade portfolio do not exceed the risk appetite (level of risk the Bank deems acceptable when achieving its goals).

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

Risk prevention measures include:

- ▶ Forecast of changes in market interest rates and adoption of measures that allow the Bank to adapt to changes in its business environment with minimum losses.
- ▶ Development of an instrument to manage interest rate risk of the trade portfolio based on the duration method.
- ▶ Diversification of the trade portfolio of debt instruments.
- ▶ Implementation of a system of limits.
- ▶ Update of the Bank's system of limits with respect to interest rate risk of trade portfolio.
- ▶ Management of the duration of the trade portfolio of debt instruments.
- ▶ Risk hedging.

Measures to regulate (adjust) the amount of risk include the following:

- ▶ Improvement of analysis models.
- ▶ Adjustment of the limit policy to manage interest rate risk of the trade portfolio.
- ▶ Diversification of the trade portfolio of debt instruments.
- ▶ Improvement of the fair value measurement methodology for debt instruments.
- ▶ Risk hedging.

Concentration risk is the risk that the Bank will incur losses or will not receive planned income as a result of concentration of certain types of risks.

The main principle of managing this type of risk is to limit the risk appetite (level of risk the Bank deems acceptable when achieving its goals).

Risk prevention measures include, but are not limited to:

- ▶ Diversification of counterparties and transactions.
- ▶ Risk limit management.
- ▶ Drafting of loan and deposit agreements providing for reallocation of risk among counterparties and clients.
- ▶ Tightening of requirements to the financial reliability of borrowers, amount of collateral under the loan transaction, and deposit agreements of major depositors.
- ▶ Improvement of the system of prevention of fraudulent transactions.

Measures of regulation (adjustment) are as follows:

- ▶ Debt restructuring.
- ▶ Preparation of plans to reduce the concentration of risk objects.

Measures to recover the necessary liquidity, in the event of its loss due to concentration risk, are determined in accordance with the existing action plan for recovering the Bank's liquidity and counteracting crisis situations.

Measures to restore the necessary performance of important IT systems, in the event of its loss, are determined in accordance with the existing action plan to ensure the Bank's ability to continue as a going concern and recover the Bank's performance as a participant of the payment system.

Application of IFRS 9 Expected credit loss model and main provisioning principles

The Bank applies the expected credit loss model to provide for financial instruments. The core principle of the model is timely recognition of deterioration or improvement of the credit quality of financial instruments taking into account current and forward-looking information. The amount of expected credit losses recognized as an allowance for credit losses depends on the degree of deterioration in credit quality from the time of initial recognition of the financial instrument.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

Depending on the change in credit quality after initial recognition, the Bank classifies financial instruments in one of the following stages:

- ▶ "12-month ECL" (Stage 1) – financial instruments for which no significant increase in credit risk was observed, and for which 12-month ECL are calculated.
- ▶ "Lifetime ECL – not impaired assets" (Stage 2) – financial instruments with a significant increase in credit risk, but not impaired, for which expected credit losses are calculated over the entire lifetime of the financial instrument.
- ▶ "Lifetime ECL – impaired assets" (Stage 3) – impaired financial instruments.

For purchased or issued impaired financial assets, the credit loss allowance is formed in the amount of accumulated changes in lifetime ECL from the date of purchase or origination.

Significant increase in credit risk

In the course of assessment of whether credit risk associated with a financial instrument increased significantly since its initial recognition, the Bank considers reasonable and supportable information, which is relevant and available without excessive costs or efforts. This includes both quantitative and qualitative information and analysis based on the Bank's experience, expert credit assessment and forward-looking information.

The objective of the assessment is to identify whether a significant increase in credit risk has occurred for an exposure by comparing:

- ▶ Probability of default for the remaining period as at the reporting date.
- ▶ Probability of default for the remaining period calculated for this point in time at initial recognition of the position exposed to credit risk (adjusted, if applicable, for changes in early repayment expectations).

The Bank uses the following criteria to determine whether there is a significant increase in credit risk:

- ▶ For legal entities, financial institutions and government bodies:
 - ▶ Financial instruments with an overdue period of more than 7 days and/or other financial instruments possessed by the debtor with an overdue period of more than 30 days, a previous debt on a financial instrument overdue for more than 90 days, if the recovery period is not over.
 - ▶ The debtor is included in the watch list.
 - ▶ Assignment of financial instruments of other debtors within a group of related potential debtors to Stage 3 if this financial instrument does not contain evidence of impairment.
 - ▶ Suspension of operations on the debtor's accounts.
 - ▶ Assignment of the debtor's activities to industries exposed to higher risk.
 - ▶ The available decision of the authorized body of the Bank on the recognition of a significant increase in credit risk (based on the results of financial monitoring and/or other reliable information) and/or classification of debt in the category of pre-non-performing debt in accordance with the internal methodology of the Bank.
- ▶ For individuals:
 - ▶ Financial assets with debts overdue for 31 to 90 days.

If there is evidence that there is no significant increase in credit risk as to the moment of initial recognition, then the loss allowance for the relevant instrument will again be estimated at the amount of 12-month ECL.

The Bank checks the criteria for whether they can detect a significant increase in credit risk by conducting regular reviews to ensure that:

- ▶ The recognition of a significant increase in credit risk is not solely related to the existence of overdue debt on an asset of more than 30 days. It is usually recognized before the specified term.
- ▶ Financial instruments are not transferred directly from Stage 1 to Stage 3.
- ▶ The period for credit quality recovery is appropriate.
- ▶ There is no unjustified volatility of the allowance for expected credit losses.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

Credit risk grades

The Bank assigns to each position exposed to credit risk an appropriate quality category based on a variety of data that is used to predict the risk of default and applied by the Bank to manage credit risk in accordance with internal policies. Credit quality categories are defined using qualitative and quantitative factors that are indicative of risk of default. These factors vary depending on the nature of the position exposed to credit risk and the type of borrower.

Each position exposed to credit risk is allocated to a certain quality category at the date of initial recognition based on available information about the borrower. Positions exposed to credit risk are subject to ongoing monitoring, which may result in assigning a quality category other than a category assigned at initial recognition.

Quality categories are determined for the following categories of debt and borrowers:

Loans to legal entities

The Bank developed the internal rating methodology for legal entities based on the comprehensive assessment of internal and external factors affecting business and financial performance, and the assessment of qualitative and quantitative indicators of the financial position and the business reputation of the debtor. These ratings are assigned to medium- and large-sized debtors and cover approximately 80% of outstanding loans to legal entities.

The applicable grading of credit quality categories of loans to legal entities includes internal ratings and other quantitative information (debt overdue period) and qualitative information (results of the financial monitoring of debtors) and is based on the Bank's internal credit risk management policy. The following debt quality categories are identified:

- ▶ Standard: there are no factors significantly affecting the increase in credit risk.
- ▶ High-risk: the debtor is characterized by indicators of a significant increase in credit risk or credit impairment, however, the debt is not assigned to lower quality categories, or as a result of financial monitoring, the debtor is included in the watch list or has debt overdue for more than 7 days.
- ▶ Pre-non-performing: the debt is overdue for more than 30 days, however, in accordance with the internal risk management policy, the Bank does not classify this debt as non-performing.
- ▶ Non-performing: the debt is overdue for more than 30 days and the support of debt was delegated to the department responsible for collection of bad debts.

Debt of financial institutions and government bodies

The banks are classified in accordance with their international ratings, if available. Ratings assigned based on Moody's, S&P, Fitch and ACRA methodology are taken into account. For counterparties for which no international rating is determined, the Bank conducts an internal gradation of quality based on factors accepted by international rating agencies when assigning ratings. The quality categories for financial institutions and government bodies are as follows:

- ▶ Standard: international ratings from AAA to B+ or comparable internal ratings.
- ▶ Sub-standard: international ratings from B to CCC or comparable internal ratings.

For government bodies, the quality categories are determined on the basis of the sovereign rating assigned by international rating agencies.

Creating a term structure of probability of default

The quality categories and the information on the overdue period are the main input data when creating a term structure of probability of default for positions exposed to credit risk. The Bank collects information on the quality of debt servicing and default for positions exposed to credit risk and analyzed by the type of product and borrower as well as by the quality category. For some portfolios, information received from external credit rating agencies is also used.

The Bank uses statistical models to analyze the collected data and generate estimates of the probability of default over the remaining period for positions exposed to credit risk, and determine how these are expected to change over time.

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

Definition of default

Default is defined by the Bank as current and/or future inability of the debtor to discharge its financial obligations to the Bank. The unconditional event of default is the existence of debt with the overdue period of more than 90 days. To determine the event of default, the Bank assesses various qualitative and quantitative indicators available without excessive costs and effort and determines the inability of the debtor to discharge its financial obligations to the Bank based on one of the events listed below or their aggregate:

- ▶ For legal entities:
 - ▶ Classification of debt of an internally rated debtor as non-performing.
 - ▶ Information received by the Bank about the court decision to initiate bankruptcy proceedings with respect to the debtor or filing by the debtor of the application for voluntary liquidation, or the declaration of the debtor's insolvency (bankruptcy).
 - ▶ Death of the borrower – individual entrepreneur.
 - ▶ Other reasons (regardless of overdue debt and/or its period) which result in the inability of the debtor to discharge its obligations to the Bank, guided by which the Bank's authorized body decided to recognize the asset as credit-impaired.
- ▶ For individuals:
 - ▶ Objective reasons indicating the impossibility of the loan repayment (for example, death of the borrower).
 - ▶ Change in (modification of) contractual terms due to the financial difficulties of the customer and the impossibility to provide services under the agreement pursuant to the original terms.
- ▶ For financial institutions and government bodies:
 - ▶ Assignment of a default rating (C (Moody's), SD, D (S&P), RD, D (Fitch), SD, D (ACRA), etc.).
 - ▶ Debt with an overdue period of more than 30 days.

Incorporation of forward-looking information

The Bank incorporates forward-looking information both in the assessment of a significant increase in credit risk since the initial recognition of the financial instrument, and in the assessment of expected credit losses. External information taken into account includes economic data and forecasts published by government bodies and monetary regulators in countries where the Bank operates, such as the National Bank of the Republic of Belarus, the National Statistical Committee of the Republic of Belarus, as well as certain forecasts of scientific and analytical organizations and international credit institutions.

The Bank identified and documented a list of key factors affecting the assessment of credit risk and credit losses for each portfolio of financial instruments and, using historical data analysis, assessed the relationship between macroeconomic variables, credit risk and credit losses.

Key indicators are determined as indices of exchange rates (USD/BYN, RUB/BYN), consumer prices, salaries and the refinancing rate. The Bank has developed several scenarios with respect to these factors (pessimistic, realistic and optimistic) based on the available external and internal forward-looking information, the sum total of factors is determined as the weighted amount including the coefficients of significance of each scenario.

Models that are used to account for the effect of macroeconomic factors on the amount of expected credit losses were determined based on the analysis of historical data for the last 6 years or longer.

Indicators of problematic restructuring

The Bank defines restructuring as problematic (and classifies this debt as credit-impaired) in cases of modification of financial instruments arising from the inability of the debtor to discharge its obligations to the Bank. The indicators of problematic restructuring of legal entities are as follows:

- ▶ Debt restructuring, if the principal or interest on a financial instrument (or the Bank's other similar charges) is overdue for more than 7 days.
- ▶ Restructuring of pre-non-performing or non-performing debt.
- ▶ Restructuring that provides for a decrease in debt and/or the interest rate at the debtor's initiative, and/or a significant change in the schedule of payments (extension of maturity for more than 90 days, a decrease in the total amount of the next payment and the following payments to be made within 90 days by 50% or more, or any other change considered as a significant decision of the Bank).

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

For individuals, problematic restructuring is a modification resulting from the inability of a debtor to discharge its liabilities to the Bank. Problematic restructuring does not include modifications caused by business needs (a reduction in the current interest rate on customer request or at the Bank's initiative as part of a special offer; debt refinancing under agreements related to the introduction of a new credit product, with no evidence of a significant increase in credit risk).

Measurement of ECL

Measurement of ECL depends on the type of debtor, nature of the financial instrument, stage of impairment, qualitative and quantitative parameters (maturity, amount, type of credit transaction, collateral, rating, etc.). The key inputs used for measuring ECL comprise term structures of the following variables:

- ▶ Probability of default (PD).
- ▶ Loss given default (LGD).
- ▶ Exposure at default (EAD).

ECL are measured as a sum of products of marginal PD, LGD and EAD discounted by the reporting date during the whole life of the financial instrument (measured up until the date when the Bank has the right to claim the repayment of the loan issued or terminate the loan commitments or warranty provisions). The estimated period for financial instruments in Stage 1 (12-month ECL model) is limited to 12 months and ECL for financial instruments in Stage 3 equal the product of the gross carrying amount and LGD.

The Bank measures ECL for legal entities both collectively and individually, for individuals – collectively only. Individual measurement is applied to the Bank's debtors requiring an in-depth analysis of the ECL amount. This measurement is applied to the major debtors of the Bank.

Individual and collective assessment of PD is based on the analysis of credit debt servicing quality, internal ratings (for individual assessment of legal entities, and partially for collective assessment, if such ratings are available), as well as on the credit history and other information about the debtor, which is available without undue cost or effort. The assessment of PD of financial institutions and government bodies depends on assigned ratings and relevant default statistics according to international rating agencies.

PD is measured using a Markov chain on the basis of which calculation models are applied for each individual homogeneous debt portfolio, and by internal rating.

Loss given default of a legal entity is determined based on the likelihood of the debtor's recovery, the expected consideration that may be received as a result of selling the collateral (the Bank uses judgment in relation to the fair measurement of such pledge agreements and the timeframe of their possible execution), the history of cash recovery rates for defaulted counterparties.

Loss given default of an individual is determined based on information on cash recovery rates for defaulted counterparties.

Loss given default of financial institutions and government bodies is determined based on external information.

In case of an individual assessment of expected credit losses to determine LGD, the Bank relies on pledge agreements concluded with borrowers and analyzes whether these agreements can cover the balance of debt under the loan agreement in the event of a borrower's default. The Bank uses a judgment in relation to the fair measurement of such pledge agreements and the timeframe of their realization.

EAD represents an estimated exposure to credit risk at the date when the event of default occurs and is equal to the present value of all future cash flows from the financial instrument (taking into account the expected amount of the loan drawdown and overdue payments) at each analysis date (at the end of each month for the entire term, or for 12 months, depending on the impairment stage).

(in thousands of Belarusian rubles)

24. Risk management (continued)**Risk measurement and reporting system (continued)***Credit quality analysis*

The following tables provide information about the credit quality of financial assets measured at amortized cost and debt instruments measured at fair value through other comprehensive income as at 31 December 2024 and 31 December 2023. Unless otherwise indicated, amounts of financial assets in the table reflect the gross carrying amount. Amounts of loan commitments and financial guarantee contracts in the table reflect the amounts of assumed liabilities and guarantees issued, respectively.

31 December 2024			
	Stage 1	Stage 2	Total
Cash and cash equivalents			
Rated AAA	145	—	145
Rated from AA- to AA+	141	—	141
Rated from A- to A+	5,109	—	5109
Rated BBB	92,636	—	92,636
Rated from BB- to BB+	71,424	—	71,424
Rated from CCC to B+	707,643	—	707,643
Rated from CCC to D	8,425	—	8,425
Only with internal credit risk grades:			
- Standard	34,422	—	34,422
- Sub-standard	—	—	—
	919,945	—	919,945
Loss allowance	(80)	—	(80)
Carrying amount	919,865	—	919,865

31 December 2023			
	Stage 1	Stage 2	Total
Cash and cash equivalents			
Rated AAA	587	—	587
Rated from AA- to AA+	26,536	—	26,536
Rated from A- to A+	10,796	—	10,796
Rated BBB	42,276	—	42,276
Rated from BB- to BB+	6,968	—	6,968
Rated from CCC to B+	543,644	—	543,644
Rated from CCC to D	1,863	—	1,863
Only with internal credit risk grades:			
- Standard	1,213	—	1,213
- Sub-standard	—	—	—
	633,883	—	633,883
Loss allowance	(172)	—	(172)
Carrying amount	633,711	—	633,711

(in thousands of Belarusian rubles)

24. Risk management (continued)**Risk measurement and reporting system (continued)**

	31 December 2024		
	Stage 1	Stage 3	Total
Due from credit and financial institutions			
Rated AAA	–	–	–
Rated from AA- to AA+	6,164	–	6,164
Rated from A- to A+	6,270	–	6,270
Rated from BB- to BB+	204	–	204
Rated from CCC to B+	39,599	–	39,599
Rated from CCC- to D	–	19,258	19,258
Only with internal credit risk grades:			
- Standard	–	–	–
- Sub-standard	–	–	–
	52,237	19,258	71,495
Loss allowance	(946)	(11,883)	(12,829)
Carrying amount	51,291	7,375	58,666

	31 December 2023		
	Stage 1	Stage 3	Total
Due from credit and financial institutions			
Rated AAA	16,666	–	16,666
Rated from AA- to AA+	389	–	389
Rated from A- to A+	11,082	–	11,082
Rated from CCC to B+	23,550	–	23,550
Rated from CCC- to D	–	4,360	4,360
Only with internal credit risk grades:			
- Standard	31,127	–	31,127
- Sub-standard	–	–	–
	82,814	4,360	87,174
Loss allowance	(676)	(4,360)	(5,036)
Carrying amount	82,138	–	82,138

	31 December 2024	
	Stage 1	Total
Debt investment securities		
Rated from CCC to B+	147,611	147,611
Allowance for losses on securities at amortized cost	(1,393)	(1,393)
<i>Including allowance for losses on securities at fair value through other comprehensive income</i>	(2,208)	(2,208)
Investment securities less loss allowance	146,218	146,218

	31 December 2023	
	Stage 1	Total
Debt investment securities		
Rated from CCC to B+	88,493	88,493
Allowance for losses on securities at amortized cost	(1,073)	(1,073)
<i>Including allowance for losses on securities at fair value through other comprehensive income</i>	(1,212)	(1,212)
Investment securities less loss allowance	87,420	87,420

(in thousands of Belarusian rubles)

24. Risk management (continued)**Risk measurement and reporting system (continued)**

31 December 2024					
	Stage 1	Stage 2	Stage 3	POCI	Total
Loans to legal entities					
Only with internal credit risk grades:					
- Standard	1,418,317	—	—	—	1,418,317
- High-risk	101	42,276	49,312	381	92,070
- Pre-non-performing	—	—	—	—	—
- Non-performing	—	—	45,358	—	45,358
	1,418,418	42,276	94,670	381	1,555,745
Loss allowance	(3,235)	(661)	(20,937)	35	(24,798)
Carrying amount	1,415,183	41,615	73,733	416	1,530,947

31 December 2023				
	Stage 1	Stage 2	Stage 3	Total
Loans to legal entities				
Only with internal credit risk grades:				
- Standard	1,295,634	—	—	1,295,634
- High-risk	1,220	10,444	64,977	76,641
- Pre-non-performing	—	—	36,271	36,271
- Non-performing	—	—	9,172	9,172
	1,296,854	10,444	110,420	1,417,718
Loss allowance	(5,700)	(273)	(25,376)	(31,349)
Carrying amount	1,291,154	10,171	85,044	1,386,369

Net investments in finance leases in the table below reflect the debt of legal entities and individual entrepreneurs since debts of individuals are not assigned any internal quality grades.

31 December 2024				
	Stage 1	Stage 2	Stage 3	Total
Net investments in finance leases				
Only with internal credit risk grades:				
- Standard	228,622	—	—	228,622
- High-risk	—	1,614	386	2,000
- Pre-non-performing	—	—	—	—
- Non-performing	—	—	543	543
	228,622	1,614	929	231,165
Loss allowance	(449)	(13)	(161)	(623)
Carrying amount	228,173	1,601	768	230,542

31 December 2023				
	Stage 1	Stage 2	Stage 3	Total
Net investments in finance leases				
Only with internal credit risk grades:				
- Standard	141,897	—	—	141,897
- High-risk	328	1,044	46	1,418
- Pre-non-performing	—	—	—	—
- Non-performing	—	—	232	232
	142,225	1,044	278	143,547
Loss allowance	(306)	(11)	(54)	(371)
Carrying amount	141,919	1,033	224	143,176

(in thousands of Belarusian rubles)

24. Risk management (continued)**Risk measurement and reporting system (continued)**

	31 December 2024			
	Stage 1	Stage 2	Stage 3	Total
Loan commitments				
Only with internal credit risk grades:				
- Standard	636,264	—	—	636,264
- High-risk	—	14,677	1,667	16,344
- Pre-non-performing	—	—	—	—
- Non-performing	—	—	6	6
	636,264	14,677	1,673	652,614

	31 December 2023			
	Stage 1	Stage 2	Stage 3	Total
Loan commitments				
Only with internal credit risk grades:				
- Standard	431,547	—	—	431,547
- High-risk	304	304	106	714
- Pre-non-performing	—	—	—	—
- Non-performing	—	—	34	34
	431,851	304	140	432,295

	31 December 2024			
	Stage 1	Stage 2	Stage 3	Total
Financial guarantees and letters of credit				
Only with internal credit risk grades:				
- Standard	301,637	—	—	301,637
- High-risk	—	21	—	21
- Pre-non-performing	—	—	—	—
- Non-performing	—	—	—	—
	301,637	21	—	301,658
Loss provision	(613)	—	—	(613)
Carrying amount	301,024	21	—	301,045

	31 December 2023			
	Stage 1	Stage 2	Stage 3	Total
Financial guarantees and letters of credit				
Only with internal credit risk grades:				
- Standard	123,731	—	—	123,731
- High-risk	—	—	—	—
- Pre-non-performing	—	10	—	10
- Non-performing	—	—	—	—
	123,731	10	—	123,741
Loss provision	(243)	—	—	(243)
Carrying amount	123,488	10	—	123,498

The following table provides information about overdue loans to customers, by credit quality stage.

	31 December 2024				
	Stage 1	Stage 2	Stage 3	POCI	Total
Loans to legal entities					
Not past due	1,417,891	41,597	83,093	381	1,542,962
1-30 days	527	679	181	—	1,387
31-60 days	—	—	293	—	293
61-90 days	—	—	275	—	275
Over 90 days	—	—	10,828	—	10,828
Gross carrying amount	1,418,418	42,276	94,670	381	1,555,745

(in thousands of Belarusian rubles)

24. Risk management (continued)**Risk measurement and reporting system (continued)**

	31 December 2023			
	Stage 1	Stage 2	Stage 3	Total
Loans to legal entities				
Not past due	1,296,751	9,487	66,464	1,372,702
1-30 days	103	957	36,402	37,462
31-60 days	—	—	87	87
61-90 days	—	—	166	166
Over 90 days	—	—	7,301	7,301
Gross carrying amount	1,296,854	10,444	110,420	1,417,718

	31 December 2024			
	Stage 1	Stage 2	Stage 3	Total
Net investments in finance leases				
Not past due	232,357	1,332	654	234,343
1-30 days	1,643	282	199	2,124
31-60 days	—	—	—	—
61-90 days	—	—	25	25
Over 90 days	—	—	51	51
Gross carrying amount	234,000	1,614	929	236,543

	31 December 2023			
	Stage 1	Stage 2	Stage 3	Total
Net investments in finance leases				
Not past due	144,561	721	214	145,496
1-30 days	251	324	34	609
31-60 days	—	—	8	8
61-90 days	—	—	—	—
Over 90 days	—	—	23	23
Gross carrying amount	144,812	1,045	279	146,136

	31 December 2024			
	Stage 1	Stage 2	Stage 3	Total
Loans to individuals				
Not past due	1,046,258	1,880	1,468	1,049,606
1-30 days	12,014	183	229	12,426
31-60 days	—	1,489	140	1,629
61-90 days	—	1,179	114	1,293
Over 90 days	—	—	19,184	19,184
Gross carrying amount	1,058,272	4,731	21,135	1,084,138

	31 December 2023			
	Stage 1	Stage 2	Stage 3	Total
Loans to individuals				
Not past due	788,909	2,335	1,722	792,966
1-30 days	11,237	190	163	11,590
31-60 days	—	2,374	110	2,484
61-90 days	—	1,834	150	1,984
Over 90 days	—	—	13,880	13,880
Gross carrying amount	800,146	6,733	16,025	822,904

(in thousands of Belarusian rubles)

24. Risk management (continued)**Risk measurement and reporting system (continued)**

	31 December 2024		
	Stage 1	Stage 3	Total
Other financial assets			
Not past due	4,150	–	4,150
Over 90 days	–	319	319
Gross carrying amount	4,150	319	4,469

	31 December 2023		
	Stage 1	Stage 3	Total
Other financial assets			
Not past due	1,402	–	1,402
Over 90 days	–	171	171
Gross carrying amount	1,402	171	1,573

Offsetting of financial assets and liabilities

The following tables disclose information on financial assets and liabilities which are subject to an enforceable master offsetting agreement or similar agreements applicable to similar financial instruments, irrespective of whether, these financial instruments are set off in the balance sheet.

Similar financial instruments include repurchase agreements, agreements for borrowing and lending of securities, loans to customers and due to customers.

The table below shows financial liabilities subject to enforceable master offsetting agreements and similar agreements as at 31 December 2024 and 2023:

Types of financial assets / financial liabilities	31 December 2024				31 December 2023			
	Total amount of recognized assets / (liabilities)	Amounts not set off in the statement of financial position			Total amount of recognized assets / (liabilities)	Amounts not set off in the statement of financial position		
		Financial instruments	Cash collateral received	Net amount		Financial instruments	Cash collateral received	Net amount
Repurchase agreements, agreements for lending of securities or similar agreements	–	–	–	–	70,000	(70,000)	–	–
Loans to customers	36,322	–	(5,866)	30,456	45,361	–	(23,156)	22,205
Due to customers	(110,295)	5,866	–	(104,429)	(102,391)	23,156	–	(79,235)

The geographical concentration of the Bank's financial assets and liabilities is set out below.

	2024				2023			
	Belarus	CIS	OECD and other foreign countries	Total	Belarus	CIS	OECD and other foreign countries	Total
Assets								
Cash and cash equivalents	1,092,803	187,864	21,148	1,301,815	718,149	4,097	145,460	867,706
Due from credit and financial institutions	38,655	7,596	12,415	58,666	54,003	11,455	16,680	82,138
Loans to customers	2,828,907	–	–	2,828,907	2,338,280	–	–	2,338,280
Investment securities	147,667	–	16	147,683	88,575	–	88	88,663
Other financial assets	4,297	–	–	4,297	1,477	–	–	1,477
	4,112,329	195,460	33,579	4,341,368	3,200,484	15,552	162,228	3,378,264
Liabilities								
Due to credit institutions	(97,582)	–	(10,619)	(108,201)	(101,935)	–	(4,996)	(106,931)
Derivative financial liabilities	–	–	–	–	–	–	–	–
Due to customers	(3,190,122)	(76,441)	(46,889)	(3,313,452)	(2,375,260)	(82,383)	(24,411)	(2,482,054)
Debt securities issued	(189,303)	–	–	(189,303)	(170,666)	–	–	(170,666)
Allowances for ECL in respect of loan commitments and financial guarantee contracts	(613)	–	–	(613)	(244)	–	–	(244)
Other financial liabilities	(13,262)	–	–	(13,262)	(14,677)	–	–	(14,677)
Lease liabilities	(2,003)	–	–	(2,003)	(1,955)	–	–	(1,955)
Subordinated debt	(3,474)	–	(70,772)	(74,246)	(3,178)	–	(64,741)	(67,919)
	(3,496,359)	(76,441)	(128,280)	(3,701,080)	(2,667,915)	(82,383)	(94,148)	(2,844,446)
Net assets/(liabilities)	615,970	119,019	(94,701)	640,288	532,569	(66,831)	68,080	533,818

(in thousands of Belarusian rubles)

24. Risk management (continued)**Risk measurement and reporting system (continued)**

The Bank's liquidity position is also assessed in terms of the liquidity ratios established by the National Bank of the Republic of Belarus.

Indicator	Regulatory standard	31 December 2024
Liquidity coverage ratio	Not less than 100%	121.0%
Net stable funding ratio	Not less than 100%	138.6%

Liquidity ratios as at 31 December 2023:

Indicator	Regulatory standard	31 December 2023
Liquidity coverage ratio	Not less than 100%	135.9%
Net stable funding ratio	Not less than 100%	129.4%

Analysis of financial liabilities by remaining contractual maturity

The table below shows the Bank's financial liabilities as at 31 December 2024 by maturity based on contractual undiscounted repayment commitments except for derivative financial instruments redeemed by the delivery of a basic asset which are shown by contractual maturity. Repayment liabilities, which are subject to notice, are treated as if notice were to be given at the earliest possible date. However, the Bank expects that many customers will not request repayment on the earliest date the Bank could be required to pay and the table does not reflect the expected cash flows indicated by the Bank's deposit retention history. The maturity analysis does not reflect the historical stability of current accounts. Their repayment has historically taken place over a longer period than indicated in the tables above. These balances in the tables below are included in amounts due in less than 3 months.

Financial liabilities	Less than 3 months	3 to 12 months	1 to 5 years	Over 5 years	Total
At 31 December 2024					
Due to credit institutions	73,442	21,131	17,982	468	113,023
Due to customers	2,858,540	305,957	166,866	5,830	3,337,193
Debt securities issued	—	141,589	64,769	—	206,358
Other financial liabilities	20,200	—	—	—	20,200
Lease liabilities	128	3,292	415	—	3,835
Subordinated debt	1,065	3,199	16,445	82,975	103,684
Total undiscounted financial liabilities	2,953,375	475,168	266,477	89,273	3,784,293
At 31 December 2023					
Due to credit institutions	86,640	7,598	15,925	499	110,662
Due to customers	2,116,416	229,970	46,622	107,932	2,500,940
Debt securities issued	—	142,879	34,632	—	177,511
Other financial liabilities	23,102	—	—	—	23,102
Lease liabilities	508	1,909	71	—	2,488
Subordinated debt	978	3,000	15,259	79,730	98,967
Total undiscounted financial liabilities	2,227,644	385,356	112,509	188,161	2,913,670

The table below shows the contractual maturity of the Bank's commitments and contingencies. Each undrawn loan commitment is included in the time period containing the earliest date it can be drawn down. For financial guarantee contracts, the maximum amount of the guarantee is allocated to the earliest period in which the guarantee could be called.

	Less than 3 months	3 to 12 months	1 to 5 years	Over 5 years	Total
At 31 December 2024	1,498,152	—	—	—	1,498,152
At 31 December 2023	1,109,257	—	—	—	1,109,257

The Bank expects that not all of the contingent liabilities or commitments will be drawn before their expiration.

(in thousands of Belarusian rubles)

24. Risk management (continued)**Risk measurement and reporting system (continued)**

The Bank's ability to repay its liabilities depends on whether it can realize an equivalent amount of assets within the same period of time.

The maturity analysis does not reflect the historical stability of current accounts. Historically, they were called by clients during a longer period than indicated in the tables above. These balances in the tables are included in amounts due in less than 3 months. Due to customers include term deposits of individuals.

Interest rate risk

The sensitivity of net interest income is the effect of assumed changes in interest rates on net interest income for one year, calculated based on financial assets and financial liabilities with a floating rate held as at 31 December. The sensitivity of equity to assumed changes in interest rates as at 31 December has been calculated after taxation.

Currency	Increase in basis points 2024	Sensitivity of net interest income / profit before taxation 2024	Sensitivity of equity less effect on profit or loss 2024
BYN	15.00	72,962	–
RUB	15.00	–	–
EUR	0.25	(1)	(2)
USD	0.50	7	516

Currency	Increase in basis points 2023	Sensitivity of net interest income / profit before taxation 2023	Sensitivity of equity less effect on profit or loss 2023
BYN	15.00	(114)	(85)
RUB	15.00	–	–
EUR	0.25	(4)	(3)
USD	0.50	6	5

Currency	Decrease in basis points 2024	Sensitivity of net interest income / profit before taxation 2024	Sensitivity of equity less effect on profit or loss 2024
BYN	5.00	(24,321)	–
RUB	5.00	–	–
EUR	0.25	1	(8)
USD	0.12	(2)	(1,271)

Currency	Decrease in basis points 2023	Sensitivity of net interest income / profit before taxation 2023	Sensitivity of equity less effect on profit or loss 2023
BYN	5.00	38	28
RUB	5.00	–	–
EUR	0.25	4	3
USD	0.12	(1)	–

(in thousands of Belarusian rubles)

24. Risk management (continued)**Risk measurement and reporting system (continued)***Currency risk*

The Management Board and the Financial Committee ensure the maintenance of open positions in foreign currency within the limits of the currency risk limitation standards established by the National Bank of the Republic of Belarus. Positions are monitored on a daily basis.

The Bank's exposure to currency risk is presented in the table below:

	<i>BYN</i>	<i>USD</i>	<i>EUR</i>	<i>RUB</i>	<i>Other currency</i>	<i>Total</i>
Financial assets at 31 December 2024						
Cash and cash equivalents	542,148	403,385	200,357	131,501	24,424	1,301,815
Due from credit and financial institutions	38,470	20,179	—	17	—	58,666
Loans to customers	2,355,185	382,995	73,431	3,310	13,986	2,828,907
Investment securities	1,465	141,714	4,504	—	—	147,683
Other financial assets	3,056	199	1,041	1	—	4,297
Total financial assets	2,940,324	948,472	279,333	134,829	38,410	4,341,368
Financial liabilities at 31 December 2024						
Due to credit institutions	(69,030)	(2,094)	(26,208)	(10,869)	—	(108,201)
Due to customers	(2,078,693)	(750,151)	(320,913)	(123,077)	(40,618)	(3,313,452)
Debt securities issued	(189,303)	—	—	—	—	(189,303)
Other financial liabilities	(13,091)	(77)	(90)	(4)	—	(13,262)
Lease liabilities	(1,935)	(56)	(12)	—	—	(2,003)
Subordinated debt	—	(74,246)	—	—	—	(74,246)
Net position for derivative financial instruments	—	(68,251)	68,251	—	—	—
Total financial liabilities	(2,352,052)	(894,875)	(278,972)	(133,950)	(40,618)	(3,700,467)
Total currency position at 31 December 2024	588,272	53,597	361	879	(2,208)	640,901
	<i>BYN</i>	<i>USD</i>	<i>EUR</i>	<i>RUB</i>	<i>Other currency</i>	<i>Total</i>
Financial assets at 31 December 2023						
Cash and cash equivalents	315,140	293,064	177,105	71,926	10,471	867,706
Due from credit and financial institutions	22,414	50,018	4,452	1,817	3,437	82,138
Loans to customers	1,867,819	378,478	54,178	37,365	440	2,338,280
Investment securities	1,243	68,533	18,887	—	—	88,663
Other financial assets	1,139	227	107	2	2	1,477
Total financial assets	2,207,755	790,320	254,729	111,110	14,350	3,378,264
Financial liabilities at 31 December 2023						
Due to credit institutions	(99,501)	(562)	(2,331)	(3,529)	(1,008)	(106,931)
Due to customers	(1,403,056)	(708,554)	(253,689)	(104,273)	(12,482)	(2,482,054)
Debt securities issued	(170,666)	—	—	—	—	(170,666)
Other financial liabilities	(14,510)	(28)	(98)	(41)	—	(14,677)
Lease liabilities	(1,628)	(189)	(138)	—	—	(1,955)
Subordinated debt	—	(67,919)	—	—	—	(67,919)
Net position for derivative financial instruments	—	—	—	—	—	—
Total financial liabilities	(1,689,361)	(777,252)	(256,256)	(107,843)	(13,490)	(2,844,202)
Total currency position at 31 December 2023	518,394	13,068	(1,527)	3,267	860	534,062

(in thousands of Belarusian rubles)

24. Risk management (continued)

Risk measurement and reporting system (continued)

The tables below indicate the currencies in which the Bank has significant financial assets and liabilities and significant forecast cash flows as at 31 December. The analysis performed represents the calculation of the effect of a possible movement in currency rates against the Belarusian ruble on profit before tax (due to monetary assets and liabilities whose the fair value is sensitive to currency rate changes). All other variables are held constant. The effect on equity does not differ from the effect on profit before tax. Negative amounts in the table reflect a net potential decrease in the statement of comprehensive income or equity, while positive amounts reflect a net potential increase.

Currency	High possible change in currency rate 2024	Effect on profit before tax 2024
USD	+25%	13,399
EUR	+25%	90
RUB	+17%	149

Currency	Low possible change in currency rate 2024	Effect on profit before tax 2024
USD	-10%	(5,360)
EUR	-10%	(36)
RUB	-17%	(149)

Currency	High possible change in currency rate 2023	Effect on profit before tax 2023
USD	+30%	3,920
EUR	+30%	(458)
RUB	+20%	653

Currency	Low possible change in currency rate 2023	Effect on profit before tax 2023
USD	-10%	(1,307)
EUR	-10%	153
RUB	-20%	(653)

Prepayment risk

Prepayment risk is the risk that the Bank will incur a financial loss because its customers and counterparties repay or request repayment earlier or later than expected, for example, on fixed rate loans when interest rates fall.

25. Fair value measurement

Fair value measurement procedures

The Bank's management determines the policies and procedures both for recurring fair value measurement of unquoted debt securities and unquoted derivative financial instruments, investment property and office buildings and for non-recurring measurement of, for example, assets held for sale.

At each reporting date, management analyzes movements in the values of assets which are required to be remeasured or reassessed as per the Bank's accounting policies. For the purpose of such an analysis, management reviews key input data used in the previous measurement by comparing information in the estimates with contracts and other relevant documents. Management, together with the Bank's external appraisers, also compares each change in the fair value of each asset with relevant external sources to determine whether the change is reasonable. On a periodic basis, management and the Bank's external appraisers present the results to the Bank's Audit Committee and independent auditors. This includes a discussion of the major assumptions used in the appraisal.

(in thousands of Belarusian rubles)

25. Fair value measurement (continued)**Fair value hierarchy**

For the purpose of fair value disclosures, the Bank has determined classes of assets and liabilities on the basis of the nature, characteristics and risks of the asset or liability and the level of the fair value hierarchy.

	Fair value measurement using			
	Quoted prices in active markets Level 1	Significant observable inputs Level 2	Significant unobservable inputs Level 3	Total
At 31 December 2024				
Assets measured at fair value				
Due from credit and financial institutions	—	6,597	—	6,597
Debt investment securities	6,310	—	90,572	96,882
Equity investment securities	—	—	1,465	1,465
Property and equipment – office buildings	—	—	31,723	31,723
Assets for which fair value is disclosed				
Cash and cash equivalents	381,950	919,865	—	1,301,815
Due from credit and financial institutions	—	52,069	—	52,069
Loans to customers	—	—	2,524,810	2,524,810
Finance leases	—	—	251,623	251,623
Investment securities at amortized cost	—	—	51,340	51,340
Liabilities measured at fair value				
Due to customers	—	3,833	—	3,833
Liabilities for which fair value is disclosed				
Due to credit institutions	—	108,201	—	108,201
Due to customers	—	1,579,814	1,719,718	3,299,532
Debt securities issued	—	—	192,019	192,019
Subordinated debt	—	—	70,255	70,255
31 December 2023				
Assets measured at fair value				
Debt investment securities	—	—	49,088	49,088
Equity investment securities	—	—	1,243	1,243
Property and equipment – office buildings	—	—	29,477	29,477
Assets for which fair value is disclosed				
Cash and cash equivalents	233,995	633,711	—	867,706
Due from credit and financial institutions	—	82,138	—	82,138
Loans to customers	—	—	2,245,687	2,245,687
Finance leases	—	—	142,849	142,849
Investment securities at amortized cost	—	—	36,475	36,475
Liabilities for which fair value is disclosed				
Due to credit institutions	—	106,931	—	106,931
Due to customers	—	1,166,408	1,314,788	2,481,196
Debt securities issued	—	—	171,019	171,019
Subordinated debt	—	—	53,088	53,088

(in thousands of Belarusian rubles)

25. Fair value measurement (continued)**Movements in Level 3 financial instruments measured at fair value**

The following table presents a reconciliation of the opening and closing balances of Level 3 assets measured at fair value as at the end of 2024.

	At 31 December 2023	Total gains/ (losses) recognized in profit or loss	Total gains/ (losses) recognized in other comprehen- sive income	Acquisitions	Sales/ disposals	Transfer to Level 1	At 31 December 2024
Financial assets							
Investment securities	50,331	8,234	(1,060)	64,035	(23,623)	(5,880)	92,037
Non-financial assets							
Buildings and structures	29,477	316	1,925	5	–	–	31,723
Total Level 3 assets	79,808	8,550	865	64,040	(23,623)	(5,880)	123,760

The following table presents a reconciliation of the opening and closing balances of Level 3 assets measured at fair value as at the end of 2023.

	At 31 December 2022	Total gains/ (losses) recognized in profit or loss	Total gains/ (losses) recognized in other comprehen- sive income	Acquisitions	Sales/ disposals	Transfers	At 31 December 2023
Financial assets							
Investment securities	50,915	7,404	704	6,187	(14,879)	–	50,331
Non-financial assets							
Buildings and structures	24,635	810	2,925	1	–	1,106	29,477
Total Level 3 assets	75,550	8,214	3,629	6,188	(14,879)	1,106	79,808

Gains on financial instruments included in the statement of comprehensive income are recognized in the line *Net gains from foreign currencies*.

Gains or losses on financial instruments included in profit or loss for the year comprise:

	2024			2023		
	Realized gains/ (losses)	Unrealized gains/ (losses)	Total	Realized gains/ (losses)	Unrealized gains/ (losses)	Total
Total gains or losses recorded in profit or loss for the period	(13)	(2,030)	(2,043)	63	774	837

The following table shows quantitative information about significant unobservable inputs used in the fair value measurement categorized within Level 3 of the fair value hierarchy.

At 31 December 2024	Carrying amount	Valuation model	Unobservable inputs	Range (weighted average value)
Investment securities at fair value through other comprehensive income	98,347	Method of discounting on the basis of observable market rates, which are adjusted for unobservable values	Discount rate	2.5-5.7%
Buildings and structures	31,723	The appraiser determined fair value using income and market approaches (methods for calculating market value in use: yield capitalization method, compensation adjustments method)	Discount for sale	Not applicable
At 31 December 2023	Carrying amount	Valuation model	Unobservable inputs	Range (weighted average value)
Investment securities at fair value through other comprehensive income	50,331	Method of discounting on the basis of observable market rates, which are adjusted for unobservable values	Discount rate	2.5-4.5%
Buildings and structures	29,477	The appraiser determined fair value using income and market approaches (methods for calculating market value in use: yield capitalization method, compensation adjustments method)	Discount for sale	Not applicable

(in thousands of Belarusian rubles)

25. Fair value measurement (continued)**Fair value of financial assets and liabilities not measured at fair value**

Set out below is a comparison, by class, of the carrying amounts and fair values of the Bank's financial instruments that are not measured at fair value in the statement of financial position. The table does not include the fair values of non-financial assets and non-financial liabilities.

	<i>Carrying amount 2024</i>	<i>Fair value 2024</i>	<i>Unrecognized gain/(loss) 2024</i>	<i>Carrying amount 2023</i>	<i>Fair value 2023</i>	<i>Unrecognized gain/(loss) 2023</i>
Financial assets						
Cash and cash equivalents	1,301,815	1,301,815	—	867,706	867,706	—
Due from credit and financial institutions	58,666	58,666	—	82,138	82,138	—
Loans to customers	2,828,907	2,776,433	52,474	2,338,280	2,388,536	(50,256)
Investment securities at amortized cost	49,336	51,340	(2,004)	38,332	36,475	1,857
Other financial assets	8,998	8,998	—	8,437	8,437	—
Financial liabilities						
Due to credit institutions	108,201	108,201	—	106,931	106,931	—
Due to customers	3,313,452	3,299,532	(13,920)	2,482,054	2,481,196	(858)
Debt securities issued	189,303	192,019	2,716	170,666	171,019	353
Other financial liabilities	19,585	19,585	—	22,870	22,870	—
Subordinated debt	74,246	70,255	(3,991)	67,919	53,088	(14,831)

Valuation methodologies and assumptions

The following describes the methodologies and assumptions used to determine fair values for those financial instruments, which are already recorded at fair value in these consolidated financial statements.

Securities at fair value through other comprehensive income

Securities at fair value through other comprehensive income valued using a valuation methodology or pricing model primarily consist of debt securities. These models include fair value measurements by discounting future cash flows using rates which sometimes only incorporate data observable in the market and at other times use observable and non-observable data. Non-observable inputs include assumptions regarding the future financial performance of the investee and its risk profile, economic assumptions regarding the industry and geographical jurisdiction in which the investee operates, and other adjustments to the discount rate.

The following describes the methodologies and assumptions used to determine fair values for those financial instruments which are not already recorded at fair value in the financial statements.

Assets for which fair value approximates carrying amount

For financial assets and financial liabilities that are liquid or have a short-term maturity (less than 3 months), it is assumed that their fair value approximates their carrying amount. This assumption is also applied to demand deposits and savings accounts without specific maturity.

Fixed and variable rate financial instruments

Fair values of unquoted debt instruments are estimated by discounting future cash flows using rates currently available for debt on similar terms, credit risk and remaining maturities. For these purposes, the amortized cost is restated at the effective interest rate, which is equal to the weighted average rate for instruments opened in the last reporting month of the reporting period. The fair value of such financial instruments is disclosed at Level 3.

Due from banks denominated in precious metals

Due from banks denominated in precious metals are measured at fair value using quotes set by the National Bank of the Republic of Belarus.

(in thousands of Belarusian rubles)

26. Maturity analysis of assets and liabilities

The table below shows an analysis of assets and liabilities according to when they are expected to be recovered or settled. See Note 24 *Risk management* for the Bank's contractual undiscounted repayment obligations.

	Total 2024			Total 2023		
	Within one year	More than one year	Total	Within one year	More than one year	Total
Cash and cash equivalents	1,301,815	–	1,301,815	867,706	–	867,706
Due from credit and financial institutions	38,648	20,018	58,666	21,576	60,562	82,138
Loans to customers	1,632,381	1,196,431	2,828,812	1,224,913	1,113,367	2,338,280
Investment securities	28,385	119,298	147,683	29,768	58,895	88,663
Property and equipment and right-of-use assets	3,376	51,876	55,252	3,096	45,374	48,470
Intangible assets	–	63,420	63,420	–	45,035	45,035
Other assets	3,936	50,148	54,084	4,090	36,363	40,453
Total	3,008,541	1,501,191	4,509,732	2,151,149	1,359,596	3,510,745
Due to credit institutions	90,607	17,594	108,201	92,653	14,278	106,931
Due to customers	1,823,620	1,489,832	3,313,452	1,406,534	1,075,520	2,482,054
Debt securities issued	133,176	56,127	189,303	140,449	30,217	170,666
Current income tax liabilities	3,501	–	3,501	2,306	–	2,306
Deferred income tax liabilities	–	33,629	33,629	–	27,276	27,276
Other liabilities	45,268	641	45,909	44,098	306	44,404
Subordinated debt	3,474	70,772	74,246	–	67,919	67,919
Total	2,099,646	1,668,595	3,768,241	1,686,040	1,215,516	2,901,556
Net position	908,895	(167,404)	741,491	465,109	144,080	609,189

Overdue loans to customers in the amount of BYN 5,187 thousand as at 31 December 2024 (31 December 2023: BYN 6,834 thousand) were included in the loans to customers with a maturity of more than one year.

The Bank's management believes that in case the Bank has to early repay amounts due to customers, it will be able to dispose of its liquid assets to make the necessary payments. The Bank's management also believes that if the financing from its counterparty banks decreases, the Bank will get support from the shareholder through an increase in the amount of subordinated debt to support liquidity. The Bank also has access to the regulator's instruments that are always in place to regulate liquidity.

For the below categories of financial assets and financial liabilities, expected maturities differ from contractual maturities.

Due to customers – the Bank's liquidity management includes an assessment of the minimum required balance on current (settlement) customer accounts, that is, the funds attracted in an amount that takes into account stable relationships with customers, which are determined using statistical methods applied to historical data on fluctuations in customer account balances for at least 30 days prior to the date of analysis. Due to this, liabilities to repay amounts due to customers maturing within over one year mostly comprise semi-fixed balances of amounts due to customers.

27. Related party transactions

In accordance with IAS 24 *Related Party Disclosures*, the Bank treats parties as related when the parties are able to control or significantly influence the Bank's operating and financial decisions (shareholders, entities under shareholders' common control, key management personnel). In considering each possible related party relationship, attention is directed to the substance of the relationship, not merely the legal form.

Related parties may enter into transactions which unrelated parties might not, and transactions between related parties may not be effected on the same terms, conditions and amounts as transactions between unrelated parties. The Bank does not perform transactions with related parties on preferential terms.

The Bank enters into banking transactions with related parties including but not limited to lending, deposit taking, cash settlement, foreign exchange, providing guarantees, as well as securities and derivative transactions.

(in thousands of Belarusian rubles)

27. Related party transactions (continued)

Outstanding balances with related parties are as follows:

	Total 2024			
	Controlling shareholders	Entities under common control	Key management personnel	Other related parties
Loans to customers at 1 January	–	17,472	378	104
Issued during the year	–	878	2,763	331
Repaid during the year	–	(12,440)	(1,838)	(317)
Revaluation of currency items	–	92	–	–
Other movements	–	–	70	(21)
Loans to customers at 31 December	–	6,002	1,373	97
Allowance for expected credit losses	–	(50)	(12)	(1)
Loans to customers less allowance for expected credit losses	–	5,952	1,361	96
Term deposits at 1 January	–	1,422	2,228	341
Attracted during the year	–	32,492	3,503	239
Repaid during the year	–	(32,219)	(5,441)	(546)
Revaluation of currency items	–	139	42	21
Other movements	–	–	10	(2)
Term deposits at 31 December	–	1,834	342	53
Current customer accounts at 31 December	6,656	274	8,041	1,190

	Total 2023			
	Controlling shareholders	Entities under common control	Key management personnel	Other related parties
Loans to customers at 1 January	–	18,747	184	105
Issued during the year	–	45,364	1,435	212
Repaid during the year	–	(48,253)	(1,244)	(207)
Revaluation of currency items	–	1,614	–	–
Other movements	–	1	(3)	(6)
Loans to customers at 31 December	–	17,472	378	104
Allowance for expected credit losses	–	(180)	(3)	(1)
Loans to customers less allowance for expected credit losses	–	17,292	375	103
Term deposits at 1 January	–	416	1,978	226
Attracted during the year	–	30,022	2,025	553
Repaid during the year	–	(29,416)	(2,053)	(430)
Revaluation of currency items	–	400	290	–
Other movements	–	–	(12)	(8)
Term deposits at 31 December	–	1,422	2,228	341
Current customer accounts at 31 December	3,111	4,756	4,026	344

(in thousands of Belarusian rubles)

27. Related party transactions (continued)

	Total 2024			
	Controlling shareholders	Entities under common control	Key management personnel	Other related parties
Subordinated debt at 1 January 2024	64,742	–	–	–
Accrued during the year	3,557	–	–	–
Repaid during the year	(3,557)	–	–	–
Subordinated loans issued	–	–	–	–
Revaluation of currency items	6,030	–	–	–
Other movements	–	–	–	–
Subordinated debt at 31 January 2024	70,772	–	–	–
Loan commitments at 31 December	–	–	425	54
Other liabilities – accrual of provision for unused vacations	–	–	1,047	–
	Total 2023			
	Controlling shareholders	Entities under common control	Key management personnel	Other related parties
Subordinated debt at 1 January 2023	45,882	–	–	–
Accrued during the year	3,226	–	–	–
Repaid during the year	(4,300)	–	–	–
Subordinated loans issued	13,148	–	–	–
Revaluation of currency items	6,785	–	–	–
Other movements	1	–	–	–
Subordinated debt at 31 January 2023	64,742	–	–	–
Loan commitments at 31 December	–	–	386	62
Other liabilities – accrual of provision for unused vacations	–	–	1,032	–

In 2024, the weighted average contract rate for loans to related parties was 10.74% (2023: 12.78%). The loans are mostly represented by long-term non-revolving credit lines, mainly denominated in foreign currency. In 2024, the weighted average contract rate for deposits was 3.89% (2023: 3.99%). During the reporting period, the Bank mainly attracted short-term deposits, commonly denominated in foreign currency.

Income and expense from related party transactions are as follows:

	Total 2024			
	Controlling shareholders	Entities under common control	Key management personnel	Other related parties
Interest income on loans to customers	–	664	76	9
Interest expense on subordinated debt	(3,557)	–	–	–
Interest expense on amounts due to customers	–	(39)	(32)	(8)
Change in loss allowance	–	130	(9)	–
Fee and commission income	–	7	7	9
Income from dealing in foreign currencies	1	7	–	–
Personnel expenses	–	–	15,196	–

(in thousands of Belarusian rubles)

27. Related party transactions (continued)

		Total 2023		
	Controlling shareholders	Entities under common control	Key management personnel	Other related parties
Interest income on loans to customers	–	1,886	38	16
Interest expense on subordinated debt	(3,226)	–	–	–
Interest expense on amounts due to customers	(35)	(22)	(20)	(4)
Change in loss allowance	–	(80)	(1)	–
Fee and commission income	–	7	5	8
Income from dealing in foreign currencies	54	32	–	–
Personnel expenses	–	–	12,598	–

Compensation to key management personnel comprises:

	Total 2024	Total 2023
Salaries and other short-term employee benefits	12,533	10,573
Social security contributions	2,663	2,025
Total key management personnel compensation	15,196	12,598

Information on remuneration to Supervisory Board members is disclosed in Note 23.

28. Capital adequacy

The Bank maintains an actively managed capital base to cover risks inherent in its business. The adequacy of the Bank's capital is monitored using, among other methods, the ratios established by the 1988 Basel Capital Accord and the ratios established by the National Bank in supervising the Bank.

As at 31 December 2024 and 2023, the Bank fully complied with all externally imposed capital requirements.

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

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

Capital adequacy ratio established by the National Bank of the Republic of Belarus

According to the requirements of the National Bank of the Republic of Belarus, the capital adequacy ratio of the Bank, taking into account the conservation buffer, should be maintained at a level not lower than 12.50% of the amount of risk-weighted assets, which are calculated in accordance with the requirements of the legislation of the Republic of Belarus. In calculating the secure functioning ratios as at 31 December 2024, the Bank did not apply countercyclical measures in accordance with Resolution No. 440 of the Board of the National Bank of the Republic of Belarus dated 12 December 2023, *On Certain Issues related to Regulation of Operations of Banks, Non-Bank Credit and Financial Institutions and Joint-Stock Company Development Bank of the Republic of Belarus in 2024*, which affect the secure functioning ratios (regulatory capital adequacy ratios, liquidity ratios, etc.). As at 31 December 2024 and 2023, the Bank's capital adequacy ratio calculated on the basis of the above requirements was as follows:

	Total 2024	Total 2023
Tier 1 capital	448,356	344,943
Tier 2 capital	203,656	203,603
Total equity	652,012	548,546
Risk-weighted assets	3,720,338	3,242,558
Capital adequacy ratio	15.578%	15.093%

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28. Capital adequacy (continued)**Capital adequacy ratio under the 1988 Basel Capital Accord**

As at 31 December 2024 and 2023, the Bank's capital adequacy ratio computed in accordance with the 1988 Basel Capital Accord using a standardized approach, with subsequent amendments including the amendment to incorporate market risks was as follows:

	Total 2024	Total 2023
Tier 1 capital	670,951	559,035
including		
Statutory fund	110,426	110,426
Retained earnings	625,410	494,887
Investments in equity securities	(1,465)	(1,243)
Intangible assets	(63,420)	(45,035)
Tier 2 capital	77,043	65,759
including		
Subordinated debt, included in the calculation of capital	71,293	61,883
Investment securities revaluation reserve	1,592	1,643
Property and equipment revaluation reserve	4,158	2,233
Total equity	747,994	624,794
Risk-weighted assets	3,965,930	3,123,715
Tier 1 capital adequacy ratio	16.92%	17.90%
Total capital adequacy ratio	18.86%	20.00%

The capital adequacy ratio under provisions of the Basel Committee is computed based on IFRS financial statements.

The difference in the amounts of risk-weighted assets that are used in the calculation of capital adequacy under the requirements of the National Bank of the Republic of Belarus and provisions of the Basel Capital Accord arises as a result of adjustments to financial statements due to differences in accounting policies.

29. Changes in liabilities arising from financing activities

A reconciliation of changes in liabilities and cash flows from financing activities is provided below.

				Non-monetary changes	Other movements		
	31 December 2023	Additions	Redemption	Changes in exchange rates	Interest paid	Interest accrued	31 December 2024
Debt securities issued	170,666	617,662	(597,237)	–	(16,737)	14,949	189,303
Subordinated debt	67,919	–	–	6,327	(3,753)	3,753	74,246
Total	238,585	617,662	(597,237)	6,327	(20,490)	18,702	263,549

				Non-monetary changes	Other movements		
	31 December 2022	Additions	Redemption	Changes in exchange rates	Interest paid	Interest accrued	31 December 2023
Debt securities issued	52,617	545,656	(432,740)	293	(1,405)	6,245	170,666
Subordinated debt	48,618	13,148	(1,000)	7,226	(3,428)	3,355	67,919
Total	101,235	558,804	(433,740)	7,519	(4,833)	9,600	238,585

Movements in liabilities and cash flows from lease liabilities are disclosed in Note 12.

30. Subsequent events

As at the date of these annual financial statements, there were no subsequent events.