BASISBANK
Hualing Group Member

ANNUAL REPORT

2021

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BASISBANK ANNUAL REPORT 2021

Letter from the Executive Chairman of the Supervisory Board

Zhang Jun
Executive Chairman of the Supervisory Board,

Dear Shareholders,

Year 2021 proved to be challenging for Georgia, as well as for the whole world, from various points of view. Together we walked down an arduous path, requiring strenuous efforts to manage and adapt to the new reality, demands on responding quickly to overcome the challenges and difficulties and finding solutions to the problems we faced, proved that for BB Holding (comprising of BasisBank JSC, BB Insurance JSC, BB Leasing JSC and Basis Asset Management Holding LLC) there is nothing impossible for astounding 29th time!

Global Pandemic imposed on us even bigger responsibilities towards both each other and the company. When summarizing the year, we can proudly say that we overcame all the obstacles for which I would like to extend the sincerest gratitude towards the BB Holding team, who worked diligently to ensure prosperity of our company and its valued members.

During the year 2021 we built capacity in prioritized strategic directions, recruited new faces, affirmed unconditional support from the shareholders in implementation of new projects and most importantly, we displayed enthusiasm, healthy ambition, outstanding team spirit and corporate unity. To summarize, we used last year to lay a strong foundation for substantial advancement and improvement of market position of our holding.

Year 2021, similarly to its predecessor, was quite hard, however, thanks to dedication and faithfulness of each BB team member, we were able to produce impressive results. We took a substantial leap in advancing digital banking services, offering customers new remote channels, to deliver higher quality service and make banking services more accessible and easier to use, we achieved solid results in our key fronts, by the end of 2021 BasisBank keeps 5th place by its assets on the market.

I would like to note that despite operating under the Pandemic ramifications, BB Holding increased its contribution to social causes. We duly acknowledge the significance of Corporate Social Responsibility for Country's economic, environmental, and social well-being and participate as donors in such impactful projects that will bring positive impact for the whole Georgian society and certain target groups.

The best example of our efforts is a special edition – Green Economy – published in close partnership with our international partners EBRD and GEFF. The journal raises awareness on such time-relevant topics, as energy efficiency and climate-change adaptation, as well as building the better future.

Management Report

BB Holding proved once again that with unity, well-grounded prioritization and dedication to the work, we stand ready to tackle challenges the year 2022 may hold. I say it with utmost certainty that we have positive, successful year of growth and development ahead of us.

After fighting 2 pandemic years side-by-side, caring for each other, there can be no doubt that for BB Holding shall write a special page in the book of advancement, growth and development in 2022 to meet our 30th anniversary and our ultimate strategic goals.

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Letter from the Chairman of the Management Board

David Tsaava
Chairman of the Management Board

BasisBank produced yet another year of stable and gradual climb on a ladder of success. Despite the challenges brought by the outbreak of COVID-19 and the consequences that remained strong in 2021, BasisBank, managed to retain the momentum, attained through dedicated and detail-oriented approach of Top Management and all vital decision-making and operating units for problem identification and problem solving to weather all impedances on the way of its development. Despite these challenges, we stayed focused on delivering on our business objectives by strengthening customer relationships, enhancing service experience across all customers' touchpoints, and committing resources to support our business and retail customers. It has been couple of years that we cemented our position among TOP-5 Commercial Banks on the market and our loyal customer base, coupled with strong capital base has now emboldened us to pursue the significant place on the Georgian financial market.

BasisBank and the Holding entirely, which comprises three wings of financial intermediaries – BasisBank, BB Leasing and BB Insurance (together referred to as "BB Group"), continued the course of steady institutional development and capacity building, building even more sophisticated Governance system and introducing new tools for making our customer and employee experience as efficient and pleasant, as can be. In our pursuit of ultimate customer experience, we accelerated digitalization process that had already proved itself on early stages of global Pandemic, when we were able to take all personnel and services remote in a matter of weeks.

The stability our teams were able to produce, secured unquestioned trust among our international financial institutional (IFI) and development financial institutional (DFI)partners, who despite macroeconomic uncertainties, provided funding to allow us to continue our dedicated support for key economic sectors of Georgian economy and build value for all stakeholders: customers, state and shareholders.

I am particularly proud of the ways in which our team has managed over the past two years. Whether they have been on site in a customer-facing role or critical function, or working from home, they have shown remarkable adaptability in continuing to deliver for the Group and for our customers. I would like to recognize and thank BasisBank's Supervisory Board for their ongoing engagement and support over the past year. And also, extend my gratitude to our winning team – "BasisBankers" for their contributions during most challenging years. Across our footprint, our team has continued to put our customers first, and demonstrated time and time again why we are one of a leading Banks in Georgia.

BUSINESS ENVIRONMENT

Despite positive shifts, overall macro and microeconomic conditions in our country remained challenging throughout the 2021. However, due to the strong performance during the second half of the year, the country was able to deliver annual GDP growth of the year – 10.4%. according to World Bank, Georgia was the second fastest growing economy in Europe and Central Asia in 2021.

Management Report

After the shocks rendered by COVID-19 and decline in economy in 2020, year 2021 was characterized by the recovery in the global economy. The gradual recovery was observed in major economies and regional countries positively affecting external demand for Georgia. While the government continued fiscal support driving internal consumption and supported the credit activities through banking sector (through measures taken in co-ordination with the National Bank of Georgia), increased domestic and external demand along with the internal investments where the key driver of 2021 year growth.

Robust growth in exports and remittances, and gradual recovery of tourism sector were important contributors to growth. In 2021 exports boosted by 26,9% due to recovery in Georgia's trading partners' economies. Imports also grew strongly by 25.1% amid strong local demand and higher world commodity prices, tightening CA deficit (currently at 9.8% of GDP) while forcing inflationary pressure.

Foreign currency inflows through remittances remain one of the main drivers for aggregate demand. Foreign currency inflows through FDIs remain a downward trend as compared to 2019.

The unemployment remains key challenge up to 18.1% by the end of 2Q2022 heightened during pandemic, for the population involved in tourism and related sectors. Delays in the recovery of labor-intensive sectors, especially tourism, will lead to an increase in long-term unemployment, which will delay full recovery due to tightening of the financial sector credit conditions, further exacerbating economic problems and delaying the start of recovery.

Astounding economic performance, coupled with the decisive monetary policy, earned our country, as well as players of the financial market, revised Credit Rating - 'BB'/Stable- restoring the Stable outlook degraded previously due to Pandemic cautions.

Financial market saw the trend of heavy regulation remain, as the National Bank of Georgia introduced new measures under the policy of De-dollarization, further restraining retail lending. The banking sector reached +7% of growth and remains sound and profitable, with robust capitalization, adequate liquidity and good asset quality.

OUR STRATEGY

Like us as the Institution, our strategy evolves and emboldens constantly. We have clear understanding what we want to be: a convenient, versatile, and efficient tool with comprehensive digital features, delivering the top-notch experience and financial well-being to our valued customers. Working in synergy with our Group companies – BB Leasing, BB Insurance and Basis Asset Management Holding– we strive to maximize our economic outreach and build bridges between individuals, companies, International Financial Institutions and other relevant stakeholders, to maximize our economic output and value for the shareholder.

Our strategic pillars – SPEED, QUALITY and FLEXIBILITY – are our guiding principles in acting on our purpose. With those in mind, we pursue three mid-term objectives: 1) Further advancing the financial group on the market; 2) Redefining our segmentation priorities and conduct; 3) Accelerate the irreversible course of digitalization.

During the year 2021 we built strongly on the proactive digitalization process, displaying astounding results throughout the previous year, taking huge steps forward building the ultimate fruit of our relentless efforts – Omni Digital Banking Channel, which will deliver distinctive and seamless service to our valued customers in a single digital ecosystem. In addition to our customer base, we bring new technological advancements to our people as well, to make their efforts for building our institution as strong as possible, more convenient and efficient. For these purposes, the Bank has been working on Data Warehouse and Business Intelligence tools, which are meant to provide our professionals with enhanced ability to acquire, store and process large inflows of information and generate added value. BasisBank maintained strategic partnership with all available IFIs and DFIs in our portfolio of Borrowings and through relentless work on both ends, was even able to conjure new financing tools that delivered much more needed relief and incentive to the recovering economy of our country. We attracted more than US$75 million in 2021 of financing, while planning for 2022 with greater force.

FINANCIAL PERFORMANCE

Navigating through the residual challenges of the previous year and uncertainties lingering throughout the whole 2021 with caution, but a clear and well-thought-out strategy, our team was able to secure yet another year of growth, closing year with Total Assets worth GEL 1,9 billion and Gross Loan Portfolio (GLP) – GEL 1.26 billion. Retail, SME and Corporate teams followed their action plans in synergy, outperforming on all forecasted indicators, against all the odds.

In June 2021, the Fitch Ratings revised our IDR that was demoted to negative during the Pandemic developments, due to obvious cautions. It was through in-depth analysis of unfolding developments and tailoring approach to each individual outstanding problem that we were able to overcome all the doubts, prove our strong institutional and financial standing and deserve restatement of the B+ rating with a Stable outlook.

Faced by the challenges of the Pandemic and ensuing lockdowns, our retail system had to be redesigned in a matter of several weeks to maintain the customer base. Not only was our team able to successfully digitalize all the services and products and take their top of the shelf customer experience, prior delivered face-to-face, remote, the relentless work yielded them 10% YOY increase in digital transactions.

Results produced in retail lending are nothing but impressive: through process optimization and tailoring approach to various lending products, our team was able to produce 14% growth to GEL 245 million as of YE2021, with significant contribution from the mortgage lending.

Having SME and corporate directions as the cornerstone of our business model, the expectations we had for the year-end results did not fall short and we achieved 15% growth from GEL 885 million in 2020 up to GEL 1,018 million in 2021.

We observe spillover of our results and success on other members of the BB Group – BB Insurance and BB Leasing. Despite their brief history of operation, which was marked with the biggest challenge of the Millennia – COVID-19 outbreak – employing the same approaches, like individual approach to each customer and implementation of accelerated digitalization policy, both subsidiaries delivered outstanding results. Producing one of the fastest claim processing period (average period for settlements for the insurance cases incurred in 2021 was 10.5 business days), BB Insurance built trust among large corporate clientele allowing the company to amass the GWP of GEL 13.4 million, an 80% spike compared to the previous year. As for the assets as of year-end 2021, BB Insurance achieved a 40% growth reaching GEL 24 million, with GEL 1.37 million as Net Profit.

Beginning the year 2021 with a massive success as the leader of the market from the ROA perspective, BB Leasing continued to build on it throughout the year, amassing as much as GEL 15.6 million in assets through inflating the portfolio by 79%, ultimately generating the profit over GEL 1.2 million. This 44% growth in profit, allowed BB Leasing to maintain the market leading position in ROA. I firmly believe that all our business divisions manage to have a positive impact on our clients, our staff, our investors, and society at large. BB Group continues to play an important role in contributing to economic growth and improvement of business environment. Recognizing this responsibility, we strive to remain a good corporate citizen, well equipped to continue pursuing our ambition.

OUTLOOK 2022

The recent years were particularly important for BB Group, full of opportunities and great challenges, marked with significant achievements and success enduring great pressure while BasisBank progressing firmly on the market. We gained and strengthened our brand, even greater trust and loyalty from our customers and acquired significant partners on international level; ever-increasing our capabilities, increasing the coverage and outreach of our customers and services, all of which has finally rewarded in outstanding achievement which was the merger of VTB bank Georgia's retail and business portfolios in mid-March 2022.

BasisBank's retail and business customers' franchise boosted significantly which is well in line with the Bank's growth strategy and ambitious transformation journey of becoming the 3rd largest bank in Georgia and gaining significant share and increasing market penetration, our footprint and presence in regions, adding new businesses and individuals to our clients' base. This transaction strengthens BasisBank's position in the retail and corporate businesses and serves the Bank's mission to enhance its franchise to achieve its strategic goals.

With ramifications of previous global pandemic still lingering, the unfolding developments in our regions, anticipated to have impact throughout the globe, suggest that this year as well, will be full of various challenges. Shortage of vital commodities which is further intensified by the war between Russia and Ukraine, spiking fuel prices, global trend of high inflation will most probably create

another bubble of uncertainty and may hinder economic growth, both inside our country and globally. We are optimistic that the government will continue to be flexible and continue the course of economy's revitalization through various programs and regulatory incentives, which will further advance healthy economic environment and invite new investments to fuel the economic growth.
For BB group our conservatively managed balance sheet, including a solid capital and liquidity position, as well as recent large-scale acquisition and subsequent enlargement, leaves us even better prepared to withstand a tough environment.

As we look forward to the coming year, we continue to find ourselves as a highly competitive player in each of our core segments, with multiple avenues to grow.

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Our strategic pillars – SPEED, QUALITY and FLEXIBILITY – are our guiding principles in acting on our purpose. With those in mind, we pursue three mid-term objectives:

1. Further advancing the financial group on the market
2. Redefining our segmentation priorities and conduct
3. Accelerate the irreversible course of digitalization

BB GROUP STRATEGY

BB Group Strategy

BB group foundation / building the history of success

BasisBank commenced its banking operations in early 90s and has since grown to one of the leading financial institutions, creating one of the most valuable banking brands and reliable financial holding franchise in the country, known as “BB Group”.

BB Group builds its strategy on a decades-long history of continuous development and success fruited in numerous achievements and the momentum it had managed to cultivate through very challenging environment inherent to emerging markets.

BB Group has a clear purpose to be the best open financial services platform by acting responsibly and earning lasting loyalty for clients, partners, shareholders and all our stakeholders. This guides us through changes and is the basis for how we shape and deliver on our strategy and encourages high performance and engagement from our team.

Our strategy is built around a client as the central focus and based on three pillars that are our guiding principles in acting on our purpose, these are: SPEED, QUALITY and FLEXIBILITY.

BB Group targets inclusive development and accelerated growth satisfying its stakeholders' best interests and expectations. The Group concentrates on key lines of development with focuses on continuous transformation and development of its strategic business lines by creating unified platform for financial services, connecting customers and businesses, introducing market-leading services, investing in digital technologies, staff, and infrastructure to improve customer experiences.

Our mid-term objectives are outlined in the following statements:

Objective	Statements
Strengthen the Group's Franchise	• Continue to maintain our strong positioning among the leading financial institutions on the market targeting strong 3rd position supported by strong capital and customer base • Emphasis on transformation and growth of our franchise gaining greater market share in key strategic business lines - Commercial Banking, Leasing, Insurance
Redefine Our Segmentation Priorities	• Strong growth performance in our focused segments through new propositions and improvment of the flexibility and the efficiency of all responsible units • Building better internal capacity and provisioning of improved products and services in terms of both convenience and efficiency, invigorated PR, product offers and renovations in front and back line to support the intensive growth plans
Maintain the Course of Intense Digitalization	• Investing considerably in platforms, technology and infrastructure to strengthen the core of our digital services • Continue to enhance our customer experience and offerings through innovative digital products and services

DELIVERING ON OUR STRATEGY

DELIVERING ON OUR STRATEGY

Progress in 2021

Aligned to our strategic objectives, we have taken number of significant steps around strengthening the organization structure and processes in the last two years.

We have redefined our organizational structure to ensure better client coverage by increasing the number of coverage segments and segregating the responsibilities of business relationships and product/project specialists. We have also strengthened our leadership team across our focused segments such as SME, Retail and Agro Banking.

In the Group, we have established a nurturing environment for both our valued customer base and our staff, with cornerstones such as sustainability, constant development, unconditional inclusiveness, and diversity. Such environment is both favorable and attractive, helping us to build decade-long bonds, based on reliability, trust and utmost satisfaction on both – employee and customer – ends.

The Group is keen on establishing a unified and agile professional environment, which will ensure that wider array of services is rendered to our customers in more time and result-efficient environment to ensure utmost synergy for all stakeholders.

During the last two years, we have initiated several large-scale process transformation and technology initiatives across our distribution channels to bring in effectiveness and efficiencies while delivering distinctive and seamless omni channel experience to our customers. We have increasingly been leveraging our alternate sales channel to deepen relationships, improve customer experience and scale up growth. We as a Bank adapted to the new normal and launched various initiatives towards providing highly personalized experiences to our customers.

In 2021 we designed and created customers complaints management system for efficiently handling the process. With a joint effort of foreign partners and our team of professionals, we introduced the BackBase platform which is deemed to be a core foundation for digital development and a turning point for the digitalization process of the Bank.

Key transformations are expected to continue in back and treasury functions. In collaboration with the Banking Sector and NBG, we are working with the potential vendors to select and implement Treasury soft which would cover Derivatives, Money market, Securities and various systems supporting front, back and risk functions.

Goals for 2022

In 2022, to improve our customer experience management and quality assurance, we plan to start development of following projects:

- Omni channel - to easily search/find and continue action/process from one to another touchpoint according to customer needs. Easy processes and common dashboard for customer service/action.
- CRM module – to get customer information easily from DWH and accumulate/analyze and offer

competitive and relevant solutions fitting to their needs; elaborate internal processes, minimize human errors and misunderstandings.

- Implement ISO 9001 - Processes, Procedures and Work Instructions for high-quality service and better customer experience.
- Implement a new Knowledge Base with smart search and other needed functions vital for quality customer service.
- Evaluation of sales staff performance according to their interaction with customers by the audio recording system. For being more precise, competent, and professional in the customers attraction process.

In 2022, we also plan to develop a fraud management system in cooperation with LexisNexis. The project will allow us to identify and prevent fraud cases based on client behavior.

Environmental, social and governance standards (ESG) and corporate social responsibility are priorities which are to be imbedded in the principle of sound and responsible lending. BB Group considers ESG issues as an important part of its strategy. In 2022, we plan to enhance our structural units and provide training to relevant staff involved in lending process, develop/enhance ESG strategy, staffing plan and lending framework in line with the changes and requirements of local law and other mandatory requirements.

Going forward, we will remain focused on growing our retail, SME business segments as well as our subsidiaries to reach leading positions on the market. Over the next year, we will continue to invest in strengthening our team structure and geographical presence across central and regional parts of the country. We will continue to transform our service model and enhance digital solutions to become more proactive and provide our customers with easier access to banking products and services through offering of a more convenient experience. We will strengthen our retail and business franchise with new propositions and superior solutions, aiming to achieve a top 3 position on the market.

THE STRATEGY IMPLEMENTATION GROUP'S STRUCTURE

BUSINESS BANKING OVERVIEW

BasisBank's approach to serving its business clients encapsulates the link between relationship banking at its best and additional benefits offered by the BasisBank group setting. Our Commercial Direction under the supervision of Chief Commercial Officer serves a sizeable number of small, medium, and large companies through strong domestic franchise and presence in all economically active regions of Georgia.

The bank's efficient multichannel sales network, segment focus and expertise allow to support its Corporate, SME as well as high-net-worth client segment in all business. Commercial Division is organized into five business lines: Corporate, SME, Trade Finance and Factoring, China Related Clients and Projects and Unique banking units. Our Team brings vast expertise and efficient customer relationship in corporate and SME lending, international trade, project financing, syndications, as well as in servicing Chinese customers. We offer a broad range of products and services to our business customers, based on in-depth client and sector knowledge combined with innovation and digitalization. Our commercial direction is fully aligned with the Group-wide strategy.

Corporate unit includes West and East Georgia regional groups, working specifically with corporate clients in the vicinity of their business location. Similarly, SME Business unit consists of West and East Regional Groups of SME bankers, also working closely with their clients, serving their business needs daily.

SME Business unit includes a specialized Agribusiness Group, staffed with agribusiness bankers, who are presented in each our regional offices specifically to boost agribusiness lending, attract new agro clients and improve service quality for the existing ones.

Through its group of personal bankers, Unique Banking unit provides premium class services to the bank's high-net-worth client segment to individually address the needs of each VIP customer. Our VIP clients benefit from superior quality of service, personal attention, and customized product solutions.

Trade Finance and Factoring group offers our clients involved in factoring and international trade business flexible, convenient and risk-free services in alternative financing solutions to address business specifics of the industry.

China Related Clients and Projects Division serves our business clients, helping them create new business opportunities and links with Chinese counterparties. Our professionals working in this division strive to build a bridge that connects our Corporates and SMEs with Chinese businesses, also supporting the Chinese clients living and working in Georgia, along with Chinese investors. The division is staffed with highly qualified Chinese language experts, trained in China.

In 2021, the focus of the Commercial Direction was directed on the following activities:

- working with state agencies to facilitate access to support programs to assist businesses affected by the COVID-19 imposed restrictions
- addressing customer concerns and tailoring solutions to their specific needs

- strengthening our team to bring in greater business focus and drive performance and efficiency
- de-risking and diversifying corporate and SME loan book
- accelerating our sustainable finance offering to our clients through various projects and enabling transition to a low-carbon future Progress
- delivering sustainable growth for clients by leveraging our network to facilitate trade, business growth and investment flows across our geographical footprint
- proactively taking measures on the operational front and developing strategies to counter the near-term challenges

CORPORATE BANKING

Our Corporate Banking Group (Corporate Department) has a deep customer base which includes top businesses, large private sector companies, financial institutions, and public sector entities.

Understanding customer expectations and responding through appropriate products and services has been central to BasisBank Group's strategy. The demand for convenience, speed and flexibility with customized solutions and innovative approaches lays at the core of our corporate business strategy. Our clients represent a large and important part of the economies we serve. We are committed to delivering on our ambition to increase support and funding for financial products and services that have a positive impact on our clients' healthy economic growth.

Complications of COVID-19 persisted in 2021, the outbreak of the coronavirus had a direct impact on the financial situation of many of our clients. Several sectors such as tourism, hospitality, real estate have experienced impact of lockdowns and contraction of businesses. Our strategy in 2021 was growing steadily with prudence and supporting our clients through their business lifecycle.

During the year, we have rationalized our exposure to high-risk segments. In 2021 our core activities were focused on servicing clients in selected sectors (such as trade, agriculture, construction, tourism) with a strong customer connection across a focused geographical footprint. We have been constantly engaged with borrowers extending support in additional term loans, working capital facility and syndications. Our portfolio growth was spread mainly between two directions - direct financing and syndicated deals.

Finding best financing solutions and supporting businesses to thrive continued to be one of our key focus areas in 2021. BasisBank's corporate lending business continued to perform well despite the low interest rate environment and challenging market conditions, reflecting the diversity of our activities and ongoing focus on prudent risk management.

Our disbursements across the selected sectors continued to improve sequentially through the year aided by improvement in operational processes and focused execution. We focused on growing healthy portfolio emphasizing sectors that offer high-growth opportunities.

Despite difficult macro conditions, we reported healthy performance, which demonstrates the resilience of our operating model. This is the outcome of rigorous and prudent execution of our strategy. Our persistent customer outreach programs and higher interaction with clients helped in improving and deepening existing relationships. During 2021, we welcomed a number of new clients and continued to mature and expand our existing customer relations.

Besides, to ensure the maximum efficiency of services and acquisition of new client, current team was strengthened with new team members.

Building g team and growing strong corporate franchise will remain a top priority for the Bank in 2022.

SME BANKING

BasisBank is an established business partner of Georgian SME companies. SME remains one of the key growth drivers for the Bank. We serve over 2,000 SME clients in a variety of sectors offering a broad range of products and services, based on in-depth client and sector knowledge combined with personalized value propositions and offerings. Thanks to our qualified team, we have managed to steadily grow our SME loan portfolio developing it in both business and agro sectors. With solid experience and proper management, our goal is to build a long-lasting partnership with our clients.

Our SME loan portfolio is well diversified and distributed across different sectors such as: Hotels & Restaurants; real estate management; construction & production of building materials; agriculture; trade; services; production and more. The concentration of the share of each sector in the total loan portfolio is in line with the regulator and our internal strategy.

The negative impact of COVID-19 on the economy and business in 2020 had a significant impact: it dramatically slowed down and hindered both business development and demand for loan products. This deterioration was also observed in the first quarter of 2021, while the demand steadily recovered towards the second half of the year. Despite the overall moderation in lending, SME segment recovered faster led by confluence of factors like low interest rates, government stimulus measures supporting the inherent customer demand. In order to mitigate the negative impact of the pandemic on the country's financial sector and to stimulate the national economy, important actions were taken with the support of the National Bank of Georgia and the Ministry of Economy (within the framework of the program Produce in Georgia) to support businesses in affected sectors: The programs included various relief components such as 6 and 12 months subsidies on the accrued interest rates including a co-financing of a refinancing rate of 5% over the entire loan period, significantly reducing interest burden for businesses and credit guarantee schemes - the systemically important project initiated by the Ministry of Economy, to facilitate those in need of additional collateral and to encourage banks to finance through additional liquidity. The role of banks in participation of the above products plays crucial role for healthy development of Georgian businesses. Total value of such subsidized loans in BasisBank's portfolio amounts approximately GEL 20 million and consists of 60 different projects. The Bank is actively involved in participation of these and other products, striving to maintain the growth trend of the portfolio.

Over the past year, a key focus for SME department was supporting our customers as loan deferral programs came to an end. The Bank's temporary loan holidays program played a key role in enabling customers to manage pandemic-related financial challenges. Pleasingly, the majority of our SME customers have returned to making their pre-pandemic repayments on loans.

We analyze that maintaining and improving the quality of a loan portfolio is a key component of proper lending. The indicators achieved in this direction once again prove the importance of conducting sound financial analysis with companies that care about business development. In 2020, triggered by COVID 19, the share of non-performing loans showed relative increase, while in 2021, with the recovery of the economy, this indicator significantly improved, also supported by the increase in demand from businesses for loans.

The positive indicators and results of 2021 highlight the fact that despite the economic difficulties caused by the pandemic, SME department has managed to maintain stable development. Our goal was to provide continuous and seamless financial services to our customers despite the changing economic situation.

Our vision and goals of the SME Lending Division were further expanded. Sectoral analysis resulted in the development of individual approaches in key sectors where the loan portfolio is mostly distributed, making us more flexible in the process of customer servicing and lending. We planned and successfully implemented the staffing of new credit groups in economically active regions, focused on increasing the loan portfolio in both small, medium and agro areas. The process of digitalization and technology changes is progressively underway, aimed at providing clients with efficient, fast, and flexible services. We also improved analytics and end-to-end processes, to speed up decision making and enhancing overall banking experiences for our SME customers. With sustainable development being our main priority for the coming years, we will continue offering modern-standard financial services to our clients.

With sound approaches and decisions, we remain committed to the development of our human capital. Despite difficult pandemic and economic circumstances, the Bank managed to retain each employee, helping them adapt to new challenges. The bank has developed a plan that envisaged a hybrid-working model combining working in the workplace and working from home that gave our employees possibility of switching the shifts and provided much convenient working environment. We constantly take care of the development, prosperity, and support of our employees to increase their engagement and wellbeing during uncertain times. The bank has introduced targeted evaluation systems to boost the performance and efficiency of its SME team. A development plan was introduced for each employee. The salary and motivation policies of the Bank remained competitive.

The department has significantly grasped the negative effects of the pandemic, and, with a common spirit and high sense of responsibility, the department got a green status. BasisBank actively cooperates with various financial organizations and donors to increase our contribution to sustainable financing. With the help of our partner institutions, important projects have been implemented that contribute to raising awareness of energy efficiency and foster the development of renewable energy in the country. In this regard, our SME lending department staff completed various certification courses and online educational trainings towards upgrading their green lending skills that have reflected in the improved productivity. Businesses had the opportunity to invest in multi-component green projects and, along with financial resources, received professional advice from our qualified staff.

During 2022, the Bank will actively continue to strengthen small and medium-sized business processes. Our work will focus on the following areas: expansion of human capital in economically active and attractive regions; a more in-depth analysis of sectors, leverage of cross-sell opportunities and offerings of customized credit products; optimization of processes and investments in people to transform our business operations and improve productivity as well as customer experience.

BUSINESS CASE: GEMUANI LTD

Sublimated fruit enterprise "Gemuani". The company owns up to 100 hectares of land, where a fruit processing plant is located. The company aims to produce healthy food, thus maintaining the highest international standards recognized for food safety. The cooperation between the company and BasisBank now proudly counts several years, seeing the company expand its markets every year. To achieve this ambitious goal, lending resources are made available through BasisBank. The company's innovative vision and goal is to create a bioactive product and successfully position it on both Georgian and European markets. To attain this goal, the company has obtained a number of certificates.

COSY LOFT HOTEL

The Cozy Loft Hotel is located in the seaside city of Batumi. A high-class hotel complex was built with the cooperation of the company and BasisBank, featuring a restaurant, bar, lounge, and other conveniences together with the comfortable rooms. The company uses high-quality and energy-efficient materials.

RETAIL BANKING

MAINTAINING THE MOMENTUM

Following the year 2020, marked by the biggest healthcare challenges of the Millennia, that touched social and economic lives of everyone and made us re-evaluate, redesign our understanding of leading life and doing business, when we successfully upheld Three Core Pillars - Speed, Quality and Flexibility – and produced a profitable end result, it was crucial to maintain the momentum and build on new experience and successful practices accumulated.

With the Global Pandemic continuing, and uncertainties, the Financial Sector at the core of our Economy, maintained the responsibility to stand with the government in the endeavor to establish sense of stability among population.

To ensure uninterrupted flow of business operations, BasisBank displayed exemplary flexibility and agility as our retail branches, being on the frontline along with our society, did not stop for even a day and ensured that each and every hour of our operation was in line with occupational safety and global healthcare standards, set forth by the World Health Organization and National Center for Disease Control. Our staff was duly equipped with necessary tools (headgear, face-shield, goggles, gloves, disinfectants).

Our operating branch worked tirelessly to establish an efficient hybrid working environment. We put in place all necessary schedules and operating procedures to ensure safety of all back-office employees, simultaneously improving operational performance through inviting focal links back to office.

Our management employed Agile principles to improving Bank's performance on retail market, engaging top-level management in day-to-day strategic planning and implementation, which ultimately led to strengthening our position.

Ultimately, we were able to build on our successful efforts and succeed in all retail directions: lending, deposits, cards, transactions, etc.

Lingering effects of Pandemic and lockdowns, which have evolved into integral part thereof, were significantly felt throughout the year. Nevertheless, limited availability of face-to-face interactions with customers emboldened our efforts to further develop our digital channels and facilitate respective outreach. Introduction of new features, such as Video Bank and improvement of existing tools yielded as much as 10% YOY increase in digital transactions.

For a better boost of our performance transaction wise and inflating commission income, we teamed up with VISA in the first half of the year and delivered a 3-stage promotion campaign, which resulted in impressive increase in card numbers and ultimately – online and POS/ATM transactions. We additionally supported this campaign by introducing SMS PIN activation feature, as well as contactless readers on our POS-terminals, which made using our cards even more convenient.

BasisBank Management and designated teams worked tirelessly to produce improved performance for both retail lending and deposit portfolios. In the spirit of Speed, Quality and Flexibility, our three core pillars, and us strive to make all processes as optimized as possible, we launched a new pilot Mortgage Application software from the global giant, IBM and paired it with the local startup, Signify, to allow electronic signing of lending documents, significantly simplifying the lending process for all borrowers. At the end of 2021, our dedication and work produced a 14% growth in retail portfolio, closing the year at GEL 245 million.

With our people being the core driver for our outstanding performance, we never stop thinking and working towards their further development and skill-honing. Our front-desk professionals received, both in-house and external training. The latter was delivered at one of the leading institutions in the field – Training Center of the Ministry of Justice. The retail staff extensively honed hard skills, associated with new software solution introduced to further improve our service quality, as well as soft skills to make interactions with our valued customers as pleasant as possible.

BIGGER, BOLDER OUTLOOK FOR THE FUTURE

Able to achieve accomplishments during the hardest of times our organization has ever faced and to build even better performance thereon, we are prepared and eager to set ourselves bigger, bolder and more ambitious goals and objectives for the upcoming year. We will maintain our course of accelerated digitization, boost efficiency of our lending professionals, and make the loan processing procedure much more convenient for our customers.

In addition, we intend to introduce even more digital conveniences to our existing and potential clientele:

- Gpay – an electronic wallet for millions of Android users in our country
- Digital cards

We set ourselves ambitious goals of maintaining upward trend in all retail directions, which will be reflected in monthly, quarterly, and annual performance plans.

OUR DIGITAL STRATEGY

DIGITAL DEVELOPMENT AND BUSINESS PROCESS REDESIGN DIVISION

Our philosophy of offering superior experience to customers using digital technology remained unchanged in 2021. We continued to invest in our technology, data sciences and operations capabilities to enhance customer offerings and launch new digital solutions.

The year saw some innovative products being launched for the Group's customers. Designing solutions that are convenient and comprehensive has been made possible by placing the customer at the center of business operations and exploiting digital capabilities. The Group's ability to leverage technology combined with analytical insights and partnerships have created new ways of serving customers through their digital journeys. The need to access online services during COVID-19 has significantly fast-tracked the use of digital channels by customers. Simple and innovative digital services are a key competitive differentiator. We are accelerating our digital strategy to provide customers with one of the best digital experiences. This requires safely embracing new technologies and people with different backgrounds.

- In early 2021, Project Management and Business Analysis Department initiated changes in project management methodology together with the IT department. The decision was to move from the classical project management to the Agile principles, the Scrum Framework, which implies the introduction of flexible management methods. As a result, the "Project Management and Business Analysis" department was renamed as the "Digital Development and Business Process Redesign Division", with newly added positions and functions changed for Project Manager/Scrum Master and Business Process Redesign Manager, New Product Owner and UX/UI Designer Positions were added.

By the end of 2021, the number of team members tripled. New standards and processes were introduced to better reflect the international best practices. We established more than 10 main business directions, and the development of these directions will be a priority of our team. Dedicated working teams were allocated for some of the directions, and teams are being formed for others. The above changes will help:

- Increase the throughput of our team
- Properly prioritize business directions and execute business plans
- Business process optimization
- Digital development

Projects prioritized in 2021
- Data Warehouse and BI (Business Intelligence)

W Data Warehouse Requirements for the Bank:
- Fast and flexible reporting
- Complete storage/sorting of historical data
- Improved data quality
- Accelerated counting and feedback mechanism
- Easy access to data
- and more ...

BI (Data Visualization and Analytics), meant to assist the Bank in the following:
- Identify ways to increase profits
- Analyze consumer behavior
- Comparative analysis of competitors
- throughput monitoring
- Optimization of operations
- Preliminary calculation of success or failure
- Trend analysis
- and more …

The implementation of the project has started and will be completed in August 2022.

- **Signify**

BasisBank continued to advance its digital strategy delivering more tools to help customers save time and reach their financial goals faster. This included Signify - an electronic subscription platform that enabled the Bank to improve its services. The client will be able to sign the legal contract electronically, without visiting the Bank. The first process launched through Signify is the signing of a mortgage agreement. Other processes will be covered in phases using the Signify platform.

- **Robotic Process Automation**

RPA is a platform through which human actions can be replaced by a robot. The first process in which the said system was used is to check the ownership structure of legal entities in public sources and to update the information about them in the banking system. The robotics allowed us to gain the following business benefits: getting rid of routine work, preventing human error, accelerating time and productivity.

- **Open Banking**

Within the framework of Open Banking, the bank has already been able to make 2 services available to third parties. These services are account list sharing, payments service. Open Banking and Open Finance approaches in general will enable the bank to evolve towards another direction - Banking as a Service, which is a world-proven method today and a source of income for banks.

- **BB.ge**

The new website of the bank was launched. It features an updated UX/UI. Updated website is simplified for users, while being flexible for the bank to maintain/manage the content.
Plans for 2022.

Major projects to be implemented:
- Launch the BackBase mobile app at the end of the first quarter
- Add new processes to RPA, Signify platforms
- Start implementing fraud management system
- Start the introduction of the Treasury system
- Development of available remote channels
- Expand and develop the division team
- Introduce highly optimal processes and standards

IT DEPARTMENT

In terms of infrastructure, the Bank is always on track to prepare its computing and technology resources for the challenges posed by a changing business environment.

We implemented several large-scale projects in virtually all core components of the infrastructure in 2021.

We managed to entirely replace the core of the computer network. As a result of the project, we achieved ten times stronger capacity of the Bank's computer network. This allows us to seamlessly develop modern-day, resource-intensive systems. In addition, the equipment we have acquired will allow for an additional 2.5 times increase in speed in the future.

Additionally, we replaced the backup management complex. We installed a system with a properly large volume and agility instead of the old, depreciated equipment. Bank data is now reliably protected.

We have upgraded and strengthened server resources and achieved a doubled RAM (operating memory) of the system.

Today's dynamic market requires rapid response and up-to-the-minute changes. This task is impossible to achieve without a flexible information technology base. A precondition to this is the so-called DEVOPS environment that implies the full automation of the software product development cycle and subsequent deployment on the test or production infrastructure. Together with the Agile approach of project management, these practices represent world-renowned tools for increasing effectiveness. To achieve this, the Bank has introduced a number of initiatives, such as a container management system (called Rancher) as well as CI/CD mechanisms for managing software product development.

In 2021, we have created a production base that will be upgraded in the future. We devoted considerable attention to the area of information security. We strengthened our infrastructure management team by hiring a cyber-security specialist. We undertook a fundamental update of the software for network protection systems acquired last year. We set up and launched a privileged customer management system.

The software division evolved as an aftermath of staff growth. Agile management methodology was introduced in close cooperation with the project management department's team. As a further step, transition to DEVOPS approach was defined as a strategic task. Now, one of our major tasks is full implementation of the projects using this approach.

The following pilot and production projects were created and launched with the active involvement of software systems development and infrastructure management teams:

- Business process management platform
- bank.ge - the online customer verification and loan approval system - was updated entirely

Thanks to the efforts of the Information Technology Department team, the Bank did not see any disruption in the business continuity during 2021.

CUSTOMER EXPERIENCE MANAGEMENT AND QUALITY ASSURANCE

The customer being the central figure and driving force of BasisBank's Customer Experience Management and Quality Assurance Division, it is our philosophy that the customer care is translated in caring for the company and its success. Accordingly, the activities of the Customer Experience Management and Quality Assurance Division at BasisBank Group are completely customer centric. Each area in the division works directly or indirectly to create a tailor-made experience for the customer, to offer quality services and products and to protect their interests. The daily activities of the division further strengthen the culture of customer orientation in the Group - "the customer as the core value of the company".

Customer Experience Management & Quality Assurance is focused on improving the customer experience daily - through research, effective follow-up on customer feedback, clarification of their concerns, and finding effective solutions after careful review of problems and complaints. Through their daily activities and behavior, the staff of the Customer Experience Management and Quality Assurance reinforce the culture of customer focus in the company - "Customer is the central value of the company.”

The concerns identified are categorized into segments, and then generalized and developed. We develop initiatives that make it easier for the customer to enjoy using out products and services, making them even more attractive and comfortable for them. What we typically do is that we put ourselves in customer's shoes whenever we hear about a problem or a generalized issue and make decisions based on the full picture. We take care of having in place proper points of contact with our customers daily, the quality of service and the development of processes, to safeguard the ongoing improvement of the user experience. We look at each service, product, process, and channel capability from the perspective of the customer's needs, striving for the desired outcome.
In 2021, the division developed two new areas - customer issue management and quality measurement. The way to this expansion was paved in the previous period, in terms of defining the software and functionality. With the development of these areas, the Bank can now manage important issues in a centralized manner and improve the quality of processes/services of customer communication channels based on the report and analysis of the work of these areas.

Up to 2,000 issues were managed by the customer issue management unit in 2021. It encompassed receiving the issues, analyzing them, fully managing the decision process, providing information about the interim decision to the customer, identifying areas for improvement as needed to secure improvement and advance customer experience.

In 2021, quality measurement was managed through the call center, online consultation, customer service management, calls in the competency area and individual recommendations and coaching were provided to service channel employees to improve work performance and upgrade service quality. As a result of measurement, coaching and recommendations, the quality of service has increased by 7% during 2021.

During 2021, dozens of new guidelines/procedures were developed by Quality Development in terms of procedures, products and services - for accurate, fast, consistent and standardized customer service. BasisBank's Knowledge Base has seen 421 updates to make sure the employees working in customer service channels were duly informed and could provide quality customer service.

Each new service and product introduced at BasisBank was tested by our team, with the shortcomings and correction process being controlled so that the customer always received quality service.

PRODUCT DEVELOPMENT STRATEGY

Understanding customer expectations and responding through appropriate products and services has been central to BasisBank Group's strategy. The demand for convenience, speed and quality solutions with quick turnaround and innovative, flexible services requires a dynamic approach in the Group.

Customer orientation acquires greater importance in our reality. The role of each employee in Product Development Department is tremendous, as our activities are directly or indirectly related to the customer satisfaction and ultimately serve to meet their needs and gain loyalty - which in turn is a key to success of the Group.

Customer outreach/information retrieval channels are becoming more diverse and easily accessible in the era of service digitization. Consequently, the consumers have better awareness of and sensitivity to the quality of services available on the market. They can easily and quickly share the experience of using the service/product with thousands of people through different means. The customers can find the desired information faster, compare conditions and services through digital channels and make decisions on the best choice. That is why it is important to monitor the pulse daily to understand what the customers want, what their needs are and what experience they will get because of our service and product.

As part of our commitment to customers, we continually review our products and services to ensure they meet customers' needs and support their financial wellbeing. Delivery of well-presented and competitive products and services is the primary task of our Group. Our main strategy is to offer a standardized product that can be grasped quickly and easily by our customers. We are also committed to being able to deliver products and services that allow for flexibility in them, so that we remain fully customer-centric by offering customized products and services when needed.

We support the needs of our clients with quality services and products even under unstable circumstances. This enabled us to deliver a full package of digital services during the pandemic challenge in 2021.

We have dedicated the year 2020 to responding to the primary needs and challenges posed by the pandemic, and we have succeeded in doing so. The year 2021 was about new realities and challenges, with services and products available in the branches becoming relevant for customers again. Accordingly, we have rethought our current product and service portfolio and have concentrated our efforts on providing opportunities for hybrid product availability for our customers which allows for a large part of services to be rendered remotely and visiting branches/service points only when necessary.

As the capacity of product competitiveness remains our main task and strategy for 2021, we review and rethink available products, take care of renewing our portfolio and we take care of reducing time and constantly optimize current service processes with technology solutions.

In 2021, we completed working on a mortgage product for immigrants and foreign nationals and rolled out a new product – loan for immigrants and foreign citizens. We considered the market requirements and opportunities, the experience of partner development companies and the wishes of potential customers in terms of both the content and the process part of the product. As a result of the dedicated work of the team, we can say with confidence that we offer the best conditions on the market to immigrants and foreigners interested in buying an apartment in development projects.

We also have been involved in the state-initiated mortgage subsidy project since September 1, 2021. Clients have the opportunity to receive a subsidy from the state while enjoying the best interest rate on the market in mortgage loans by BasisBank. Interested clients can pass all the steps of loan application and processing remotely and visit the service centers just to activate the loan.

Instant Credit Card

We aim to deliver the best products, services and outcomes for our customers to ensure we are meeting their needs and supporting their financial wellbeing. With Instant Credit Card our customers have the opportunity to get the instant credit card limit approved, with the help of www.bank.ge or contact us at our service centers to get their instant credit card as soon as the limit is approved. By offering this service, the customers can get the credit limit approved in just a few hours, get their card, and use the limit on the same day.

New Website BB.GE

A new website was launched in 2021, featuring customer-centric information and a simple interface that allows users to get information about our products and services, offers and partnership offers in a single place.
Users are free to make calculations and obtain information about both loan products and deposits, apply for a loan, order a card or open a deposit.

We devoted the year 2021 to defining and introducing BasisBank's digital marketing strategy. We updated the positioning priorities, communication tone and channels with clients. This enabled us to optimize advertising costs and maximize cost efficiency.

Further, we worked on updating the user personas, reviewing the current products and services in accordance with the new strategy, identifying areas for development, and developing a strategy for having in place the products and services needed to evolve towards new segments.

Under the new strategy, we have broken down marketing communication into segments. We first started segmenting our own customers. The analysis was followed by defining new segments of marketing communication and advertising. In the process, we defined the need for visual style updates and fully tailored it to the types and interests of our clients.

We started using segmented SMS advertising and opened a direct communication channel to provide information about current and tailored offers to our customers. In collaboration with partners, we have developed seasonal promotions and gifts (discounts, cashback, vouchers).

We have developed cross-marketing communication with the companies in our Holding, offering products and campaigns of interest to our audiences and segments.

OUR PEOPLE

The Bank continued functioning in the face of the challenges posed by COVID-19, the world's major challenge in 2021. Nevertheless, the Bank was able to achieve the set goals, as the Bank's divisions focused on solving current and upcoming tasks, their constant dynamic merging and collective support.

Our people have shown remarkable resilience, compassion and determination over the past year – coming to work inspired to help customers navigate COVID -19. The past year prompted us to reflect on how and where we work best to balance the needs of our customers with those of our people. We quickly adapted our work environments to prioritize the health and safety of our people and customers. We listened to our people to understand their needs and we put forth our efforts to support the best working environments to enable wellbeing, collaboration and deliver for our customers.

COVID-19 has accelerated the adoption of remote and flexible working arrangements. We have embraced a hybrid-working model combining working in the workplace and working at home. Our hybrid working model seeks to enable what is best for our people, teams, and customers, and reflects trends in the external environment.

As a highly responsible organization, we are committed to protecting the health of both our employees and their families, as well as our valuable clients. With our people's physical and mental health being a priority, we have considered it necessary to raise the awareness of our staff in the field of vaccination. We held an online meeting with Mr. Bidzina Kulumbegov, one of the main immunologists-allergists of Georgia, highly trusted professional by Georgian population. The meeting was interactive, our staff was given the opportunity to ask direct questions of interest and receive comprehensive answers to them.

At the same time, we launched a vaccination promotion campaign "Together for Each Other". As part of the promotion, we have set up various types of raffles for employees who were fully vaccinated. The raffle was held online.

We also awarded the structural units, which were at least 80% vaccinated, with the status of "Green Zone" and a certificate.

As the back office continues to operate remotely, one of the main tasks for 2021 was to switch the office administration team within the HR department to the digital work, which includes:

- Creation of a virtual space/server for the incoming/outgoing correspondence database
- Wider use of electronic signature system
- The first phase of the electronic records management unit was introduced in 2021.

Several procedures have been changed/added in connection with the pandemic. It was done to ensure the continuity of business processes, and timely delivery of documents to the staff working remotely in electronic format.

The following work was done for staff development:

At the end of the year, our team was joined by a soft skills trainer, who assisted in conducting meetings with front office and sales staff to identify training needs and developed front-office and sales training modules. 2022 KPIs were written across the Bank.

We are updating standards, tools and training for employees to respond effectively to a broader spectrum of customers and are enhancing processes to better identify key issues impacting interactions and cooperations with our customers. Despite the distancing, the staff continued to be actively cared for and trained in various areas: The following trainings were conducted to improve the qualifications of the employees:

- Basics of operational risks

The participants were introduced to operational risk approaches, operational risk classification and risk management strategies. Three lines of defense of operational risk was studied; the participants analyzed the importance of information security and cyber risk in operational activities.

- "Lean Management"

Training participants explored lean management techniques and approaches and developed practical skills for working with lean philosophy.
Lean management is a management philosophy that allows a company to create a greater value for the customer by reducing losses.

- "MIT Sloan Fintech Conference 2021"

At the end of the year, we identified the most well-deserved Employees of 2021 and handed out traditional gifts.

THE GROUP'S STRUCTURE

In 2017, BasisBank founded two subsidiaries, BB Insurance and BB Leasing, in tandem forming a new holding – "BB Group". The Group offers a range of financial services to its customers, banking and non-banking financial service encompassing entire spectrum of retail, wealthy Individuals, small, medium, and large businesses, and state-controlled organizations.

Our goal is to build the best open financial services platform on pillars relevant and significant for the modern society: sustainability, remote access, convenience, efficiency, corporate responsibility, and others.

Our subsidiaries continue to deliver strong operational performance even during the volatile period brought by Covid-19 outbreak, we remain focused on improving our market share and attaining scale in respective businesses.

Three subsidiaries are operating under the BasisBank Group umbrella: BB Insurance, BB Leasing and Basis Asset Management Holding Company (BAMH).

BB INSURANCE

BB დაზღვევა INSURANCE

BB Insurance is a rapidly growing company serving individual and legal entities and providing a broad range of insurance products covering motor, property, life, travel and corporate packages. BB Insurance focuses on digital sales, swift and easy claims settlement processes, highly reputable reinsurers, flexible and simple products, strong financial standing, and solid professional staff. These advantages enable the company to maintain and increase flexibility and be accessible to clients across the country, with a simple governance structure and effective decision-making process. BB Insurance delivers services through BasisBank Group's branches in all cities and regions all-over the country.

The process of serving customers digitally became essential in 2021, thus BB insurance together with group holding member companies, has prioritized creation of digital financial marketplace and created the fundaments for launching mentioned marketplace by the end of the 1-st quarter of 2021. The transformation of sales approach will deliver significant result in 2022. Top priority of the company is to concentrate on developing remote services, enabling the clients to claim reimbursement in the most flexible way, thus saving their time.

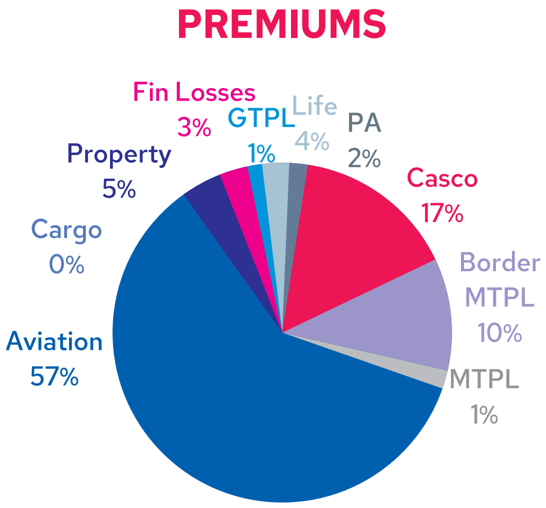
By continued improvement of products, BB insurance has restructured the credit life Insurance packages at the end of 2020 and covered pandemic risks which was critical for the clients. As a result of it in 2021 we managed to increase our business in credit life insurance and settled several strategic alliances with significant credit lenders that helped us to increase the sales of other insurance products too.

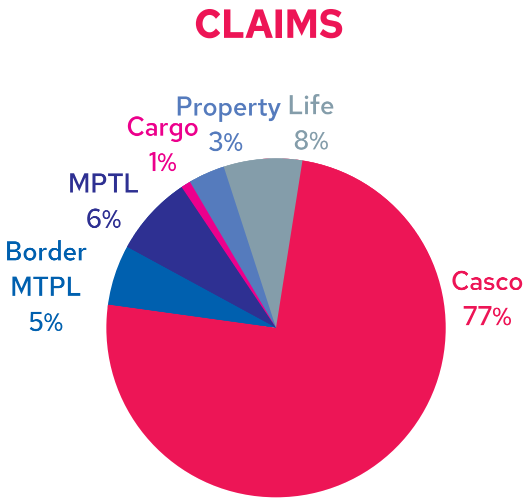
Due to hard pandemic situation in 2021, some key directions of our insurance company which were related to touristic sector has significantly decreased, however still thanks to our diversified portfolio we managed to maintain solid profitability and to expand our business. In 2021 we were focused on increasing our corporate clientele in various direction which helped us to strengthen stability and profitability of our portfolio. One of the key directions we are actively majored in is Aviation sector, thus we captured the mentioned market and become leading company in Aviation Insurance.

Picture below illustrates break-down of our Gross Written Premium (GWP) by products:

In 2021, overall in the world and in Georgia we had a high inflation, thus costs for claims settlement has significantly increased. In 2021 we managed to settle claims in the amount of over GEL 2.4 million and still maintained the excellence in claims settlement period. Our average period for settlements for the insurance cases incurred in 2021 was 10.5 business days.

Chart below illustrates the reimbursed claims by products:





In 2021, despite having hard pandemic situation, BB Insurance managed to increase GWP by 80% reaching to GEL 13.4 million; Assets of the company have increased by 40% exceeding to GEL 24 million. The Company ended the year 2021 with net profit of GEL 1.37 million (2020: GEL 1.36 million).

BB LEASING

BB Leasing is a company with the clearly defined customer relationship strategy: a focus on long-term cooperation and the establishment of transparent conditions for leasing, which serves as a precondition for responsible financing and the core of the company's philosophy.

BB Leasing is among the key players on the leasing market by its financial performance and size of its leasing portfolio, which illustrates how a start-up leasing business can achieve market recognition with a client-oriented approach and rapid adoption to the new business environment (pandemic situation).
During the year 2021 BB Leasing has diversified its range of products and offered to the market various types of services. Some Key types of products are following:

Vehicles leasing

- Lease of New vehicles through official car dealers operating in Georgia; Mentioned direction is one of the key targets for BB leasing and in order to expand it we sort an alliance with international group TOYOTA representation in Caucasus, thus becoming one of the exclusive partners to sell their branded cars through our leasing services in Georgia.
- Lease and import of vehicle from the USA market; Importing vehicles from USA is one of the leading business in Georgia, thus in order to capture the market, we created tailored products, formed alliances with several leading Georgian car importers and started actively financing clients who were in need to imported vehicles from the USA with lease services.

Leasing of fixed assets

- Lease on Georgian Market: This product is an alternative way of rapid development of small and medium business. Individuals and legal entities can use special payment schedule, which can be adjusted to their own income schedule or business cycle, and lease equipment for a maximum amount of GEL 500,000. The insurance component here is mandatory, and that is smoothly handled by the group member insurance company.
- Lease on Chinese market: BB Leasing's competitive advantage is its strong Chinese shareholders structure, which gives us opportunity to act as a mediator between Chinese companies and Georgian customers and to provide Georgian clients with a wide range of opportunities to use financial leasing for acquiring and importing constructional machineries directly from China.

APMA Project Leasing

- It is an agricultural Machinery Leasing which is co-financed with the Agricultural Project Management Agency of Georgia. The agro-leasing project component serves to develop added value-creating infrastructure for agricultural products. Preferential agro-leasing is intended for enterprises that produce agricultural products (modern farms, greenhouses, etc.), process agricultural products in any form (storage, packaging, processing), or produce agricultural product packaging. Enterprises that have approved state co-financing under the co-financing project are also viewed as clients. Because the leasing of the APMA project is an important product for the development of the country's economy, the company pays special attention to its promotion.

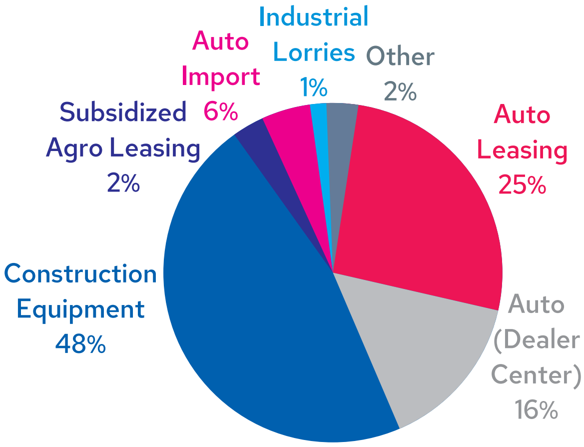
BB Leasing's performance and results achieved in 2021 demonstrated that the Company is financially sound exhibiting strength through stability, growth capacity, and progress toward its goals. The years 2021 and 2020 were challenging for businesses and households, triggered by economic uncertainty around coronavirus pandemic impacting consumer confidence and flattening demand.

Last year more than ever, networking at many different levels was critical for companies. This was the only way to deal with the current challenges and exploit synergies and opportunities meaningfully and in a future-proof manner. Due to the risk our clients' low performance during pandemic period, BB Leasing has individually worked with every client and helped them to generate alternative sources of income through help our leased assets, thus strengthening our customers and strengthening the solidness our portfolio.

Despite challenges, BB Leasing managed to generate a low risk-bearing leasing portfolio of GEL 9 million, which is +79% growth on y/y basis. About 73% of portfolio comes on investments in legal entities and entrepreneurs, remaining 27% are investments in retail segment, which provides diversification of portfolio, reduction of concentration on sector level, and is in line with the strategy risk framework adopted by the parent. As of the end of 2021, BB Leasing's portfolio concentration on product base is:

In 2021 Assets exceeded GEL 15.6 million, portfolio grew by 79% and net profit increased by 44% up to GEL 1.2 million, hence we maintained our leading position on the market in terms of profitability with the highest ROA ratio on the market. Next steps of BB Leasing are development of supplementary services to the clients, by adopting digital solutions which will be used by our customer where on the top of leasing services they will be able to use of holding's insurance and banking products, thus supporting the cross-selling within the holding.

PORTFOLIO BY PRODUCTS



HUALING GROUP

The Group's parent - Hualing Group

BasisBank is a member of Chinese conglomerate Hualing group - a Chinese private enterprise group with broadly diversified businesses in China and extending overseas businesses, Including Georgia.

Xinjiang Hualing Industry and Trade Group Co. (“Hualing Group”) is in an ownership of BB since 2012. Being a major shareholder of the bank, keeping controlling stakes of above 90%, Xinjiang Hualing Industry and Trade Group Co. is committed to develop strong financial institution under the umbrella of BasisBank group with emphasis on integrated growth of business franchise and strong advancement on the market.

Hualing group is presented on Georgian market since 2006. The areas of the Group's interests are broad and comprehensive included processing and mining of wood and forestry industry, construction of infrastructure facilities, a large-scale modern commerce market, Hotel and tourism, etc. Hualing Group's vision is to leverage the advantage of its presence in Eastern Europe and Asia, develop along with the “Silk Road” project initiative and reviving the historic role of Georgia as the trading hub between Europe and Asia, progressively making Hualing markets a bridge between the two regions.

The founder and owner of the Group, Mi Enhua, is a prominent Chinese businessperson, with extensive experience in business sector, awarded multiple times for his special contribution to China's economic development and charity work.

OPERATING AND FINANCIAL REVIEW

ECONOMIC ENVIRONMENT

The year 2021 was characterized by the gradual recovery of the global economy from the COVID-19 pandemic. However, the beginning of the recovery process has been putting upward pressure on prices through strong fiscal stimulus, increased credit activity and delayed consumption. Georgia was no exception to this trend, with annual inflation significantly exceeding inflation target and reaching double digits in the second half of the year.

In 2021 Georgia's economy expanded robustly. The real GDP growth reached 10.4%[1] in 2021, following a contraction of 6.8% in 2020. Private consumption, driven by fiscal stimulus (e.g., subsidies and social benefits) and credit activities during the year, was the major driver of that economic growth. The strong inflows of net remittances positively contributed to the economic recovery.

The gradual recovery is observed in major economies and regional countries positively affecting external demand for Georgia.

After the lockdowns and imposition of strict regulations in 2020, tourist inflows started to recover in 2021, which supported to economic growth. However, the annual revenues received from international traveler is still lower than pre-pandemic levels (although only by 38% as compared to year 2019 results).

The Russia's military invasion of Ukraine creates a risk for the county to be perceived as moderately risky destination for most of the markets except neighboring countries. Unlike pandemic, which closed all source markets for destinations, the war will have varied affect, based on this we expect that tourism indicators will recover stronger than they did in 2020 and 2021. Recent migration of Ukrainian, Russian and Belarusian citizens pushed up travel receipts. It is expected that migration, caused by war, is going to have larger impact on short and long-term rental market rather than on hotels.

External finances are weak – high net external debt and large Current Account Deficit (CAD) leaves Georgian high dollarized economy vulnerable to external shocks. However, risks were well managed during the pandemic due to strong donor support and credible macro-prudential and monetary policy framework, as well as robust growth in exports and remittances, and gradual recovery of tourism sector were important contributors to growth. In 2021 EU was leading in all external linkages: exports, remittances, tourism and FDI.

Gradual recovery in the tourism sector and a healthy inflow of net remittances support narrowing of the current account deficit (CAD). By the end of 2021, CAD has reached 9.8% of GDP and its financing has changed for the better. The FDI's share in financing CDA increased, while its debt contribution decreased. The main reason for the increase of FDI was the rise in reinvestments and the majority of FDI went to the finance, energy, and manufacturing sectors. Despite the fact that the trade of goods deficit widened by 21.3% y/y in 2021, net remittances, net tourism receipts and FDI flows, supported foreign reserves.

The war possesses various risks for Georgia. In 2021, all external flows, which include exports, remittances, tourism and FDI, from Russia and Ukraine to Georgia cumulatively accounted for 9.3% of GDP. Trade sanctions or restrictions can aggravate price stability risks and at the same time can negatively affect incomes generated from exports. This escalation looks to keep energy and food costs elevated. The risks are that a

[1]Source Geostat

continued conflict and further sanctions exacerbate tensions and drive commodity prices even higher. In Georgia exogenous shocks are an ever-present threat and these factors can cause actual inflation to deviate from the target level.

Inflation has been more persistent than expected in recent months. Supply-side factors had a significant impact on price dynamics in Georgia. These include the significant increase in the cost of transporting and global rise of price of goods in the international commodity market. At the same time, the inflation dynamics were also affected by the sudden increase in economic activity, Lari depreciation and a spike in utility prices.

To mitigate inflationary expectations the NBG tightened monetary policy, increasing the policy rate a cumulative 250bp, from 8.00% (at the start of 2021) to 10.50% (by the end of 2021). According to the NBG's forecast, fading out of high base effects should start to bring down inflation from the second quarter of 2022. However, in this respect events in Ukraine add a further twist to the outlook by pushing up inflation and weakening growth.

Outlook

Just as the pandemic appeared to be behind, a war has started as Ukraine was invaded by Russia. The Russia-Ukraine war has already added to upward pressure on energy prices. The magnitude of the impact will vary according to the industry and will depend on the duration of the conflict and length and scope of sanctions against Russia.

According to the IMF's estimates (April 2022), the Georgian economy is expected to increase by 3.0% in 2022. However, these predictions are expected to be revised as the tendencies in growth has significantly exceeded the forecast, which was made right after the war in Ukraine broke out.

The forecasts remain highly sensitive to Pandemic-induced and evolution of certain external factors, including the duration of the Russia-Ukraine conflict, oil prices, tourism, and remittances flows. In baseline scenario private consumption will continue to be a major driver of economic growth. However, a broadening of the Ukraine crisis and uncertainty over consumer spending are the new risk factors. The conflict is going to affect economic activity directly through disruption to trade and finance and indirectly as business confidence slumps and firms put their plans on hold. The result is weaker economic growth.

The war possesses various risks for Georgian external balance: trade, remittances, and tourism. Even the worst case, the external balance expected to remain positive. Additionally, tourism indicators may recover stronger than they did in 2021 and remittances expected to be compensated by inflows from other countries.

Russian aggression looks set to keep energy and food costs elevated. The risks are that a continued Russian expansion and further sanctions exacerbates tensions and drives commodity prices even higher. In Georgia exogenous shocks are an ever-present threat and these factors can cause actual inflation to deviate from the target level.
Georgia's financial sector has shown resilience to the pandemic and the war in Ukraine. Georgian economy is relatively "experienced" in navigating through different types of global and regional shocks. In recent years, due to several acceleration of crisis and bans endured from Russia on the Georgian goods and services, the Georgian economy has thrived to decrease its dependence on the Russian economy.

The Government is committed to address these issues with prudential and inclusive macro-economic and fiscal policy. Key targets for the Government are to contain inflation, improve business environment, foster regional integration, and enhance the country's potential as a transportation and logistics hub, upgrading the country's infrastructure, address labor deficiencies and continues with structural reforms.

Banking Sector Review

The Georgian banking sector showed resiliency during the pandemic, and it was one of the main driving forces for the strong economic performance in 2021.

Georgian banking sector continued to grow in 2020 and 2021, the sector was well prepared to face complications caused by the pandemic:

- Banking sector endured pressure from tightened operating environment and contracting businesses which resulted in deterioration of assets qualities and increased risk costs.
- The economic lockdowns caused significant financial distress for households and corporations, particularly hitting business engaged in HORECA sectors.
- In 2021, profitability, liquidity and solvency indicators of the banking sector improved significantly that allowed banks to recover capital buffers released at the beginning of the pandemic.
- Top peer banks, including BB recovered these losses in 2021 and restored CAR to pre-pandemic level.
- The financial sector continued to provide full range of services without disruption.

The pressure from the pandemic on the Georgian banking sector has reduced amid the solid economic performance. The portfolio quality has already been revived in parallel with economic recovery. In 2021, the share of non-performing loans in total loans' portfolio decreased to 5.2% from 8.4% in end of 2020. An improved portfolio quality coupled with an appreciated Lari against the US dollar releases capital requirements for commercial banks and compensates the effect of recovered capital buffers imposed by the NBG.

Funding profiles of the banking sector remained solid. Despite a high level of dollarization on funding side, banks maintained good access to the local as well as foreign markets to refinance their debts throughout the pandemic.

The banking sector profitability metrics have recovered in 2021, amid to recovered provisions and revived business activities.

Regulatory Environment

At the beginning of the pandemic the NBG eased capital adequacy buffers to reduce the negative shocks resulting from the pandemic. Since the main phase of the pandemic related shocks have passed the NBG gradually begin to restore capital requirements. According to the NBG pipeline, effective from 2022, banks will be given one year to restore the currency induced credit risk buffer and two years to restore the capital conservation buffer.

In addition, a new capital charge rates for the concentration and GRAPE buffers are in place for all commercial banks. Considering the profitability and capitalization of the Georgian banking sector, the restoration of the released capital buffer requirements is not expected to have any significant impact on the lending activities.

The macro prudential policy followed by the NBG past few years significantly promoted resilience of the Georgian banking sector against the external shocks. Additional capital buffers, responsible lending practices, de-dollarization policy and introduction of the liquidity coverage and net stable funding ratios were the main emphases of the macro prudential policy.

According to the NBG stress-tests the Georgian banking sector is well-capitalized with sufficient liquidity buffers, so that it can successfully deal with the shocks emerged from the war initiated by the Russia against the Ukraine.

FINANCIAL PERFORMANCE OF THE GROUP

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BB's progress on the market was considerable - the main task was to ensure steady growth, retain sound financials and pre-tax earnings history and achieve these targets with careful risk management practices to retain sustainability during the most challenging environment. By the end of 2021 BB kept 5th place by its assets and gained 3% of the market share. Growth of assets was reached through intensive expansion of lending averaged to 15%.

BB retained robust profitability and overcome problems imposed by Covid-19 pandemic in 2020 and 2021. Net profit growth of 64% y/y of the Group is mainly driven by increased operating income across almost all revenue categories, supported by recoveries in loan provisioning charges. 7% of our consolidated net income before administrative and other operating expenses, charges for expected credit losses and income tax expense revenue was generated by the affiliate businesses (BB Leasing, BB Insurance).

Reported Results on Income Statement

In million GEL	End of 2021		End of 2020		
	Bank Standalone	Consolidated	Bank Standalone	Consolidated	y/y pct.
Net interest income	66.1	67.9	53.0	54.4	24.9%
Non-interest income (net)	9.8	13.8	8.9	12.5	10.1%
Total net revenues	76.0	81.7	61.9	66.9	22.1%
Operating expenses	(38.2)	(41.2)	(28.7)	(31.2)	31.9%
Pre-impairment operating profit	37.8	40.6	33.2	35.7	13.5%
Provision for loan impairment	(0.9)	(0.9)	(9.9)	(10.0)	
Income(loss) before income taxes	36.9	39.6	23.3	25.7	54.3%
Income tax expense (benefit)	(0.8)	(1.1)	(1.2)	(1.5)	
Net Income	**36.1**	**38.6**	**22.0**	**24.2**	**59.3%**

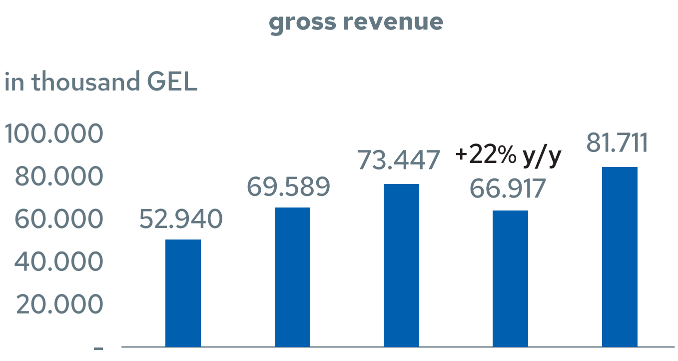
Renewed funding structure and increased customer demand on services and products resulted in increased Gross operating revenues by +22.1% y/y.

Key Performance Indicators	2021	2020	2019
Profitability measurements	**Consolidated**	**Consolidated**	**Consolidated**
Cost/income ratio	50.4%	46.6%	44.2%
Pre-impairment operating profit on average equity	12.3%	12.1%	15.4%
Pre-impairment operating profit on average assets	2.4%	2.0%	2.7%
Pre-tax return on average equity	12.0%	8.7%	15.0%
Return on Equity (Profit After Tax/ Total Equity)	11.7%	8.2%	14.1%
Return on Assets (Profit After Tax/Total Assets)	2.3%	1.4%	2.4%

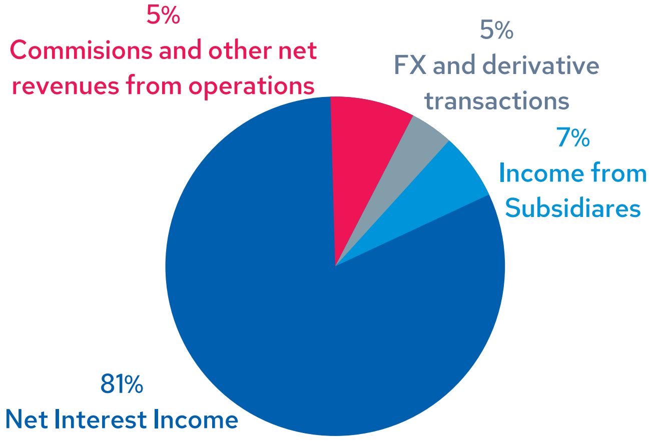
Profitability is well ensured by steady growth in healthy assets. The concentration in non-performing assets in loans and properties were significantly improved during the years. Such exposures decreased by GEL 28 mln through recoveries of defaulted loans and sales or foreclosed properties.

Recovery process for non-performing assets was remarkable during 2021, Impairment charges are close to 0 for the period providing 1.9% of GLP provisioning coverage by the end of 2021 (IFRS). Same was 2.4% in FY2020.

Solid track of revenue growth



Revenue Structure



Financial Performance of the Group

Net non-interest income

Non-interest income is a significant part of operating income, and currently the share of such income is relatively low as compared to peers. In 2021, the hare of non-interest income in total revenues amounted to 17%. It leaves significant room for the potential development of the business activities. Our focus on business financing for the last decade to ensure the steady growth was the main focus of the bank. We intend to accelerate our efforts on development of our internal functions to ensure increase in number of transactions mainly our focus is on development of digital platforms, we expect key modules to be finalized in 2022, which will allow to process greater volume of information and offer our services in all our directions banking, leasing and insurance through renewed and upgraded digital platforms in accordance with the modern requirements.

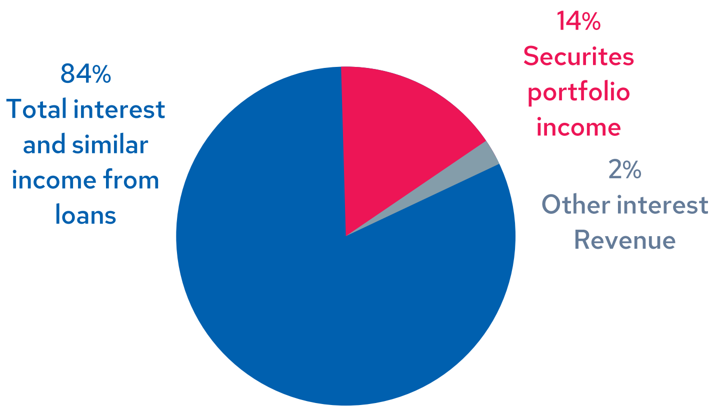
The latest addition of new clients and business through migration will significantly increase the volume of transactions.

Net interest income

Net interest income remains the main source of the bank's revenue generation capacity. In 2021, net interest income amounted to 83% of the group's revenues, with a solid 25% annual growth. The improved performance of this business line was mainly related to the increased portfolio yields coupled with the reduced liquidity in 2021 compared to the pandemic year.

Despite increased interest rates in the post-pandemic inflationary environment, total interest expenses reduced by 4.1% y/y. An increase monetary policy rate makes the NBG Lari more expensive instantly, but the price effect was successfully balanced by the reduced unnecessary liquidity throughout the year. On top of that, the bank was always successfully raising a long-term funding from international financial institutions that acted a natural hedge role in the increasing interest rates environment.

Interest income Structure



Net Interest Income (NII) and Net Interest Margin (NIM)

NIM evolution Net Interest Margin (NIM) *(in million GEL)*	2021 *Consolidated*	2020 *Consolidated*	Change in pct. *Consolidated*
Total interest and similar income	133.8	121.2	10.4%
Total interest expenses	(65.9)	(66.8)	-1.3%
Net interest income	67.9	54.4	24.8%
Average interest-earning assets[1]	1,602	1,566	2.3%
Average interest-bearing liabilities	1,187	1,174	1.1%
Gross interest yield[2]	8.4	7.7	0.7 ppt
Gross interest rate paid[3]	5.5	5.7	(0.2) ppt
Net interest spread[4]	2.8	2.1	0.7 ppt
Net interest margin[5]	4.2	3.5	0.7 ppt

[1] Average balances for each year are calculated in general based upon month-end balances.

[2] Gross interest yield is the average interest rate earned on our average interest-earning assets.

[3] Gross interest rate paid is the average interest rate paid on our average interest-bearing liabilities.

[4] Net interest spread is the difference between the average interest rate earned on average interest-earning assets and the average interest rate paid on average interest-bearing liabilities.

[5] Net interest margin is net interest income expressed as a percentage of average interest-earning assets.

Net Interest Margin

In 2021, net interest margin improved by 0.7 pp y/y. Interest margin was positively affected by the increased loans and securities portfolios yields by 0.2 pp y/y and 0.4 pp y/y in 2021. While on the funding side, the cost of funds reduced by 0.2 pp in the same period. Improved liquidity position was another significant factor that contributed the growth of NIM in 2021.

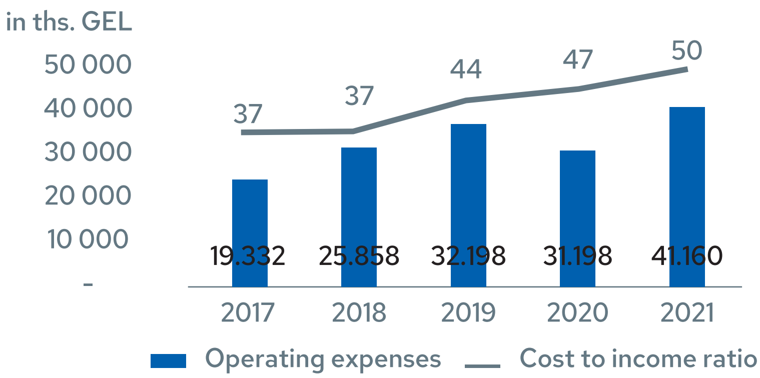
The "Larization" policy adopted by the NBG is one of the most systemic factors that press net interest margins for all commercial banks. The pressure is high in the case of a high level of dollarization on the funding side. Increased mandatory reserves requirement in the foreign currency funding significantly increases total interest expenses that had to be paid to accumulate sufficient resources, while the reserves kept on the NBG accounts are accruing zero or even negative interests.

Operating expenses

In the recovery period, the group successfully managed to maintain reasonable operational efficiency. In 2021, the administrative and other operating expenses incurred compose 50% of net operating revenues, BB is retaining cost ratio pattern same as in 2020. Pre-impairment revenues remain at about 3.4% of average gross loans sufficiently wide to withstand an increase in loan impairment charges.

The majority of the administrative expenses are attributable to staff costs. In 2021, it amounted to 59% of total administrative expenses. The bank is steadily continues financing strategic development projects in 2022 that have some impact on administrative expenses but will contribute to achieving the group's strategic goals for upcoming years.

Incurred expenses and Cost ratios



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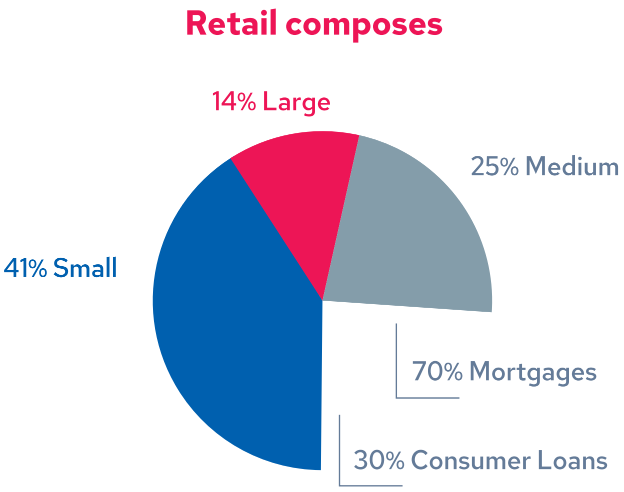
Our investment in cyber security and IT development and digital transformation investments is our key focus for investments.

BB progress

In 2021, the loans portfolio increased by GEL 162 mln, +14.7% y/y. The business portfolio was the driver of 2021 growth with 15.0% annual growth, +133 mln GEL, while retail portfolio increased by a GEL 29 mln, +13.7% y/y. The share of loans portfolio in total assets increased by 12.3 pp y/y to 64.2%. Total assets decreased by 6.7% y/y at the expense of reduction in extra funding. Liquid assets share in total assets decreased by 12.9 pp y/y to 30.1%.

The business portfolio remains well-diversified with a maximum concentration in HORECA with a 11.7% share, which was mostly negatively affected by the pandemic.



UNIQUE - High net worth individual clients with high annual income and wealthy businesses

PAYROLL - clients acquired through corporate business clients under payroll projects

MASS RETAILERS - middle class consumers

Sectoral concentration in GLP

The growth of the portfolio in the retail segment remained one of the main challenges for the group. The share of the retail segment in the total loans' portfolio amounted to 19.4% by the end of 2021.

Funding

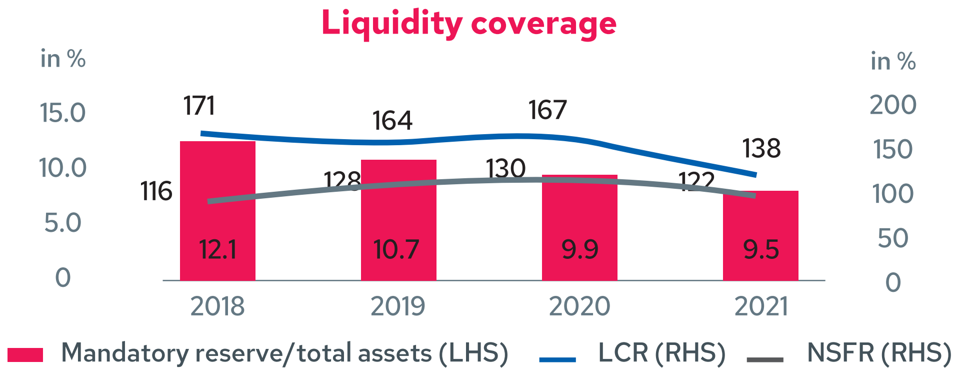
On the funding side, the group remains strong relationships with international financial partners and loyal customers. The bank has been operating with sound liquidity and a diversified funding base for a while and has a solid funding base for potential growth.

As of December 2021, customer deposits amounted to GEL 880 mln, 56% of total liabilities. While borrowings and subordinated debt portfolio amounted to GEL 668 mln, 42% of total liabilities. In 2021, the bank significantly improved the concentration of deposits portfolio that reduces risks of massive deposits outflows. Individual deposits portfolio increased by 44 mln, +12.4% y/y to GEL 400 mln, while concentrated business deposits portfolio reduced by 102 mln, -17.6% y/y to GEL 480 mln.

On the aggregate level, the bank finances 46% of assets by customer deposits, 34% by IFI and domestic borrowings, 18% by equity and 2% by other liabilities.

Capital and liquidity

The group successfully coped with economic turmoil related to the pandemic in the last two years. The bank managed to support the economy with sufficient liquidity while maintaining solid capital adequacy standards. In 2021, assets quality, profitability and capital adequacy significantly improved allowed the bank to recover capital buffers before the date set by the NBG.



Despite reduced liquidity in 2021 compared to the pandemic year, liquidity indicators are well above the minimum requirements. The liquidity coverage (LCR) and nets stable funding ratios (NSFR) which checks how a bank can withstand short and long-term liquidity requirements and funding structure are comfortably satisfying the NBG requirements. By the end of 2021, the LCR stood at 127% (requirement 75%) and 145% (requirement 100%) in Gel and Foreign currencies, while NSFR amounted to 122% against 100% requirement.

Assets Quality

BB's asset quality metrics as per local standards are largely in line of Georgian banking sector. The pressure from the pandemic on the portfolio quality has been reduced amid the solid economic performance.

PAR90 exposure has been reduced from 4.6% to 1.7% in the timeframe from end of 2020 to 2021. Recoveries Non-Standard clients followed in 2021, so that by the end of 2021, BB stood better as average banking sector in terms of PAR90.

In 2020 about 40% of GLP was granted of payments holidays, grace period for 3-12 months. The total exposure of the loans, which were granted the payment holidays, makes up 3.8% of the loan portfolio at the end of 2021. NPL under international standards constitutes 3.8% as of Q4'2021 and the share of stage 3 loans in GLP reduced by 2.8 pp y/y to 4.7% by the end of 2021

Capital adequacy and regulatory compliance

At the beginning of 2020, following the outbreak of COVID-19, to mitigate negative effect on financial sector, within the Supervising action plan National Bank of Georgia (NBG) allowed Commercial Banks to use capital buffers during the financial stress by lowering capital requirements, allowing the banking sector to absorb potential losses through these buffers and continue ordinary business activities and funding of real economy.

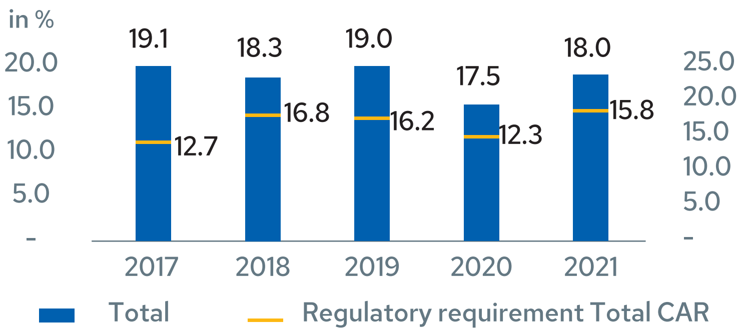
NBG took the following measures to loosen the pressure on capital - On capital requirements NBG Postponed

- the phasing in of additional capital buffer from CAR to CET1 requirements planned in March 2020;
- decreased regulatory demand for conservation buffer of 2.5pp on CET1 to 0;
- released 2/3 of additional Currency induced credit risk (CICR) buffer under pillar 2 covering FX risks.

This measure proved to be supportive to the growth throughout the system and extension of financing was maintained serving as a stimulus to the businesses during the most difficult environment. The banks are required to gradually refill the released buffers scheduled up to the end of 2023.

In October 2021 BB applied to the NBG and refused the use of buffers based on Bank's robust financial performance, quality of assets and sound capitalization, at the same time lifting all regulatory restrictions on capital distribution implied as per provisions of “Regulation on Capital Adequacy Requirements for Commercial Banks”. As at end of end 2021, BB's capital adequacy ratios were comfortably above the fully loaded capital requirements by more than 2.1%.

Backed by the robust performance coupled with the positive macro-economic outlook the capital requirements were officially restored to the pre-pandemic level, to ensure smooth development and progress of the bank as well as confidence of stakeholders and our partners.



Current supervisory requirements for BB

Based on the decision of the Supervisory board of JSC BasisBank (“BB”), on February 27, 2022, the Bank announced the merger of loan and deposit portfolios from JSC VTB Bank Georgia's and the process of migration of clients' balances to its ledgers. Under this transaction we acquired GEL 586 million of retail loan and GEL 516 million of retail customer deposits. On March 10, 2022, BB made yet another decision to purchase a part of corporate loans and deposits, in total amount of GEL 200 million and GEL 147 million, respectively.
NBG fully supported and granted its mandate to conduct acquisition of retail and corporate loan and deposit portfolio from VTB Bank Georgia.

This transaction increased BB's assets by more than 50% positioning BasisBank as one of the top 4th largest Bank on the market by the end of quarter 1, 2022.

As a result, BB's retail and business customer franchise has boosted significantly which is well in line with the Bank's growth strategy and ambitious transformation journey of becoming third largest bank in Georgia and gaining significant share and increase market penetration, increase our footprint and presence in regions, adding new business and individuals to our clients' base. This transaction strengthens BB's position in the retail and corporate business and serve the Bank's mission to enhance its business and achieve its strategic goals.
To facilitate the process and allow timely and smooth migration of portfolios NBG issued temporal waivers on BasisBank's capital positions:

- Fully released the capital conservation buffer (2.5%) until YE2023;
- Partially released of the 2/3 of the currency induced credit risk buffer until YE2022;

BasisBank is committed to ensure timely refill of capital and liquidity buffers and prevent any pressure on the Bank' solvency standing and fall back to compliance with Regulatory requirements within the timeframe stated above.

RISK MANAGEMENT

RISK MANAGEMENT AND CONTROL SYSTEM

Risk management and control systems are key in ensuring stable and robust development of the bank and the group in pursuit of delivering its strategic goals aligning risk, capital and performance targets with interests of customers, shareholders, employees and stakeholders.

The Risk Strategy, reviewed and approved on the Board level, is derived from the business strategy. The Risk Strategy defines key priorities, sets targets for the execution and deals with changes in economic, social and regulatory environment; ensures a medium-low risk profile as defined by the risk appetite framework of the bank, taking into account the principles of market best practices and regulatory expectations. Risk Strategy is approved by the Supervisory Board and is modified at any time when strategy is revised, but at least annually and it is essential to be available for the whole institution.

The Risk Strategy defines the group's approach to risk management including general methodologies to identify, assess, control, report and manage / challenge relevant risks; and the risk governance structure built to support these activities within the everyday operation of the Bank.

Risks are managed via a framework of principles formalized in policies and procedures, and the organizational structure with clearly delegated authority levels and measurement and monitoring processes that are closely aligned with the activities of divisions and business units. This dedicated governance framework ensures that all inherent risks are controlled in a proper way within the everyday operation of the Bank.

Risk Governance

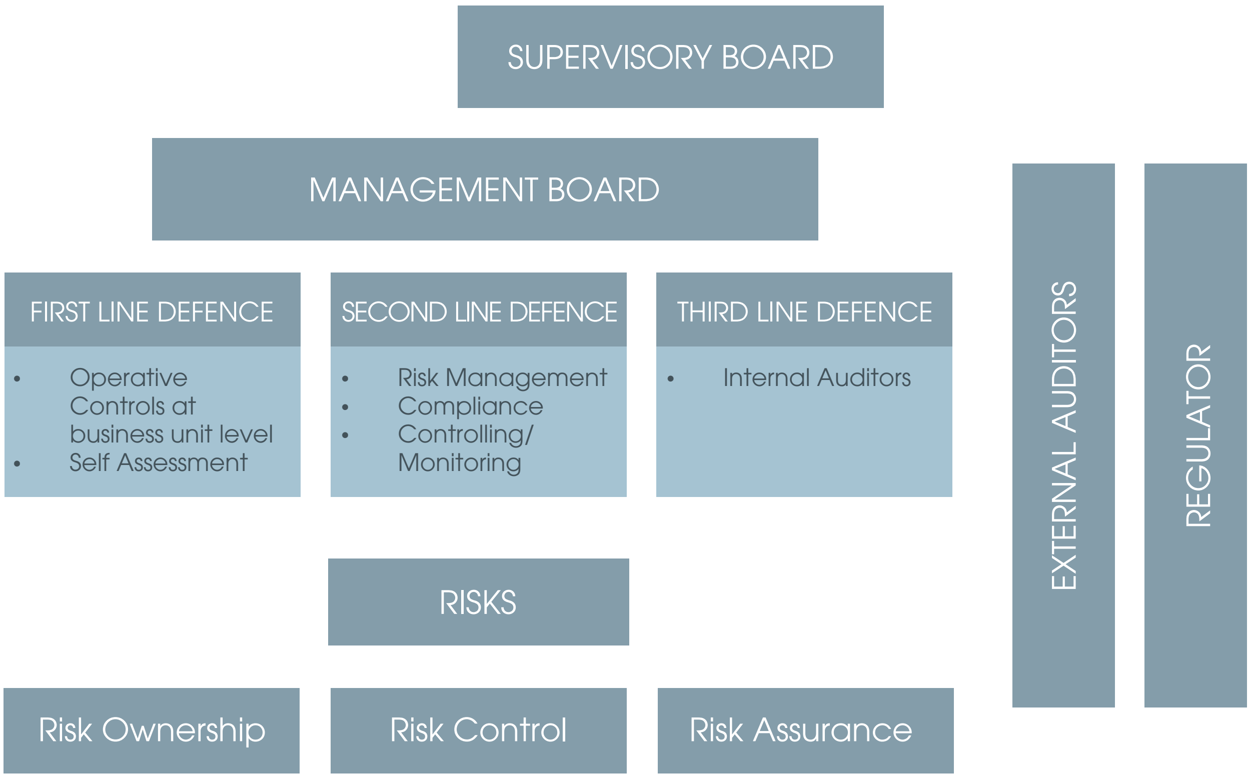
The group follows strong risk governance framework which pursues effective control and management of risk profile as defined by the Board.
At a strategic level, risk management objectives supported by the risk governance structure are:
- To define Bank's strategy based on the Group's Risk Appetite and Capital Plan
- To optimize risk return decisions by taking them as closely as possible to the business;
- To ensure business growth plans are property supported by effective risk infrastructure;
- To manage risk profile so that financial soundness remains stable under a range of adverse business conditions.

This governance framework is underpinned by the distribution of roles among the three lines of defense, a robust structure of committees, and risk sharing responsibility from top Management level down through to each business line, unit manager and/or risk officer.
Lines of defense

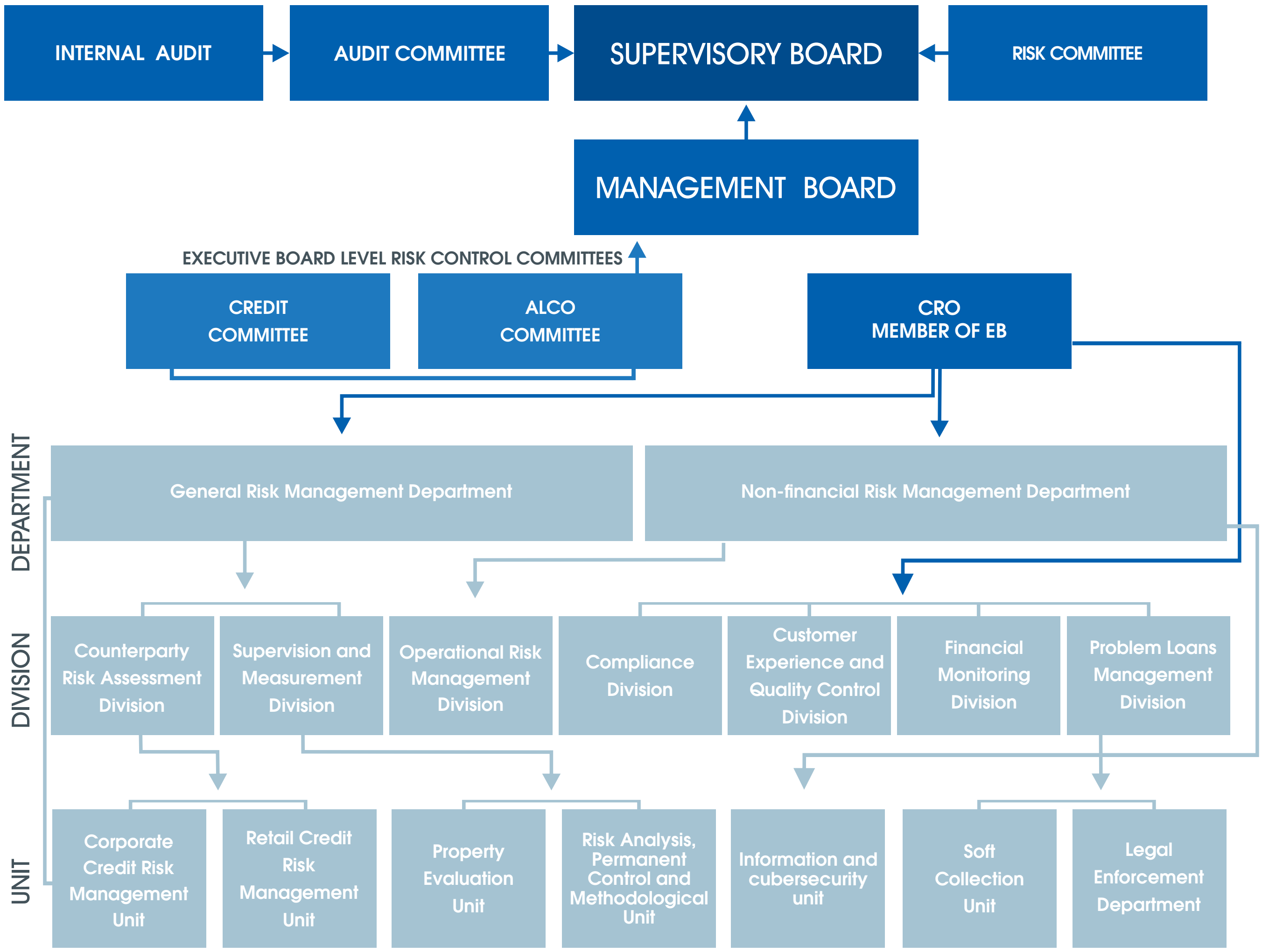
The risk control is organized across three lines of defense:

- Business unit level - operational day-to day management of risks are the task of business units and back support functions that originate risks, and therefore have primary responsibility in the management of those risks. Each risk owner establishes and reviews the risk management tools and structure for the risks generated as a part of their activity, ensuring that daily risk management is regulated in accordance with the policies of the Bank and executed according to the detailed operational level regulations of the Bank.

- Risk Department level – internal control and compliance oversight is the responsibility of this function, as well as identification and challenging the risks. The limit system is operated by Risk Management who has to report the result to the Executive Board on a regular Basis. In case of limit breaches, mitigation actions need to be defined by the Executive Board. The risk management also monitors activities of the first line of defense. These functions ensure that risks are managed in accordance with the risk appetite, fostering a strong risk culture across our organization. They also provide guidance, advice and expert opinion in risk-related matters.
- Internal audit level - for assurance to senior management and the board that the first and second lines' efforts are consistent with expectations, Internal Audit function controls and regularly checks that the policies and procedures are adequate and effectively implemented in the management; controls that all risks are consistent with the bank's risk appetite statement and internal regulations; monitors compliances with all regulatory and other mandatory requirements.



Risk Governance Structure Within Basisbank



Risk Governance Structure in the Bank ensures effective segregation of duties from the senior management through managerial units to the front line personnel; Core risk management responsibilities are embedded in the Management Board responsibilities and delegated to senior risk managers and senior risk management committees responsible for execution and oversight. Cross-risk analysis and regular reviews are conducted across the Group to validate that sound risk management practices and a holistic awareness of risk exist.

Risk Oversight function and risk management systems is split between following risk management units:

- The Supervisory Board,

- The Management Board
- Audit Committee
- Risk Committee,
- Assets and Liabilities Management Committee (“ALCO”)
- Risk Management department
- Treasury department
- Credit Committees

The Supervisory Board and the Executive Board have a sound understanding of risk management and its importance to the sustainable and strategic development of the Bank.

At Supervisory Board level - the independent Audit Committee and Risk Committee, which report directly to the Board and give unbiased information about adequacy of existing policies and procedures, adherence to the group's risk strategy, risk appetite and risk positions, regulatory compliance and other internal and external regulations;
At Management board level - an Independent Risk Management unit, and risk-profile committees in credit, assets & liabilities management committees level, to ensure sound risk management practices and decision making process; Risk management analytical and decision making tools; Comprehensive system of financial and managerial reporting to meet regulatory requirement and needs of Management Board; Detection and classification of different types of risks which the group potentially faces; Policies, procedures and guidelines, which govern management of risks across the organization.

Supervisory Board - is setting “the tone on the top” by establishing and fostering a high ethical and responsible culture in the bank. The Supervisory Board has overall responsibility for the oversight of the risk management framework. As a top governing body of the Bank, the Supervisory Board approves and exercises control over the implementation of the Bank's strategy and its budget, sets the general approach and principles for risk management by assessing the Bank's risk profile, the adequacy and effectiveness of the Bank's risk management framework, approves individual risk strategies, setts risk appetite and the risk control framework.
The Risk Management policies are approved by the Supervisory Board of the Bank aim to identify, analyze and manage the risks faced by the Group. They assign responsibility to the management for specific risks, set appropriate risk limits, set the requirements for internal control frameworks, and continuously monitor risk levels and adherence to limits. Risk management policies and procedures are reviewed regularly to reflect changes in market conditions, emerging best practices, products and services offered.

Audit Committee - is an independent control function, which regularly reviews internal controls and processes; reviews bank's internal control system, evaluates its objectivity and correctness; provides oversight of the bank's internal and external auditors' recommendations; approving, or recommending to the Board on monitoring the financial accounting process; provides oversight of the effectiveness of the risk management system, particularly of the internal control system and the internal audit system. The audit committee reports to the Board on quarterly basis on key risk portfolios, on risk strategy and supports the Supervisory Board in monitoring the implementation of this strategy; monitors the Management Board's measures that promote the company's compliance with legal requirements, regulations and internal policies.

Risk Committee monitors the Bank's risk profile, evaluates adequacy requirements for principal risks, including evaluation, monitoring and limits of the risks; debates and agrees actions on the risk profile and risk strategy across the Bank; discusses all risk policies and related documents proposed for approval to the Supervisory Board prior to their submission; evaluates effectiveness of the bank's internal control and risk management systems together with the Internal Audit Committee; reviews test results of risk management environment conducted by external audit and develops corresponding recommendations; periodically reviews existing limit system.

Management Board is responsible for managing the Bank in accordance with the law and its' Terms of Reference in performing its activities in accordance with the goals and objectives of the Bank. Management Board is responsible for establishing effective business organization and adequate segregation of duties and subordination; structuring the business to reflect risk, ensuring existence of adequate procedures, including approval of all policies prior to submission to the Board, reviewing and approval of procedures before implementation.

Management oversight and control culture involves inclusion of key items of internal control into the regular tasks of the Management Board. The scope of Management Board's control function includes review of performance to streamline the progress toward the strategic goals, control activities at division and departmental level, regular reviews of the bank's strategy and risk and capital limits to ensure compliance with exposure and capital limits; follow-up on non-compliance to ensure that management at an appropriate level is aware of the transaction or situation and to establish accountability; requiring approval and authorization for transactions above certain limits; review of evaluations of internal controls, ensuring prompt follow-ups on recommendations and concerns expressed by auditors and supervisory authorities related to internal control weaknesses.

An effective internal control system requires that significant risks are identified and assessed on an ongoing basis. This process should cover all risks assumed by the banks and operate at all levels within it. Individual policies for Credit, Operational and AML policies enable the Bank to measure, aggregate and report risk internally, as well as use this information for regulatory purposes. Further, Bank's internal methodologies and manuals provide description of processes from credit decisions - granting, pricing and approval, to portfolio management and capital adequacy.

The Management Board establishes committees and functional units within the bank to ensure overall oversight and management of risk.

ALCO Committee reviews current and prospective liquidity positions and monitors alternative funding sources; reviews maturity/re-pricing schedules with particular attention to the maturity distribution of large amounts of assets and liabilities maturing; develops parameters for the pricing and maturity distributions of deposits, loans and investments; develops alternative strategies which take into account changes in interest rate levels and trends, deposit and loan products and related market/banking regulations, etc.; performs an independent review of the validation and reasonableness of the inputs, assumptions, and output of the ALM model(s) and procedures; approves limit structure on counterparty risk.

Credit Committee acts in the best interest of the Bank and in compliance with internal policies and procedures; evaluates potential clients' financial standing and their ability to repay the loan; reviews loan applications and makes decisions within the authority delegated to the committee; reviews loan collection practices to improve loan underwriting and collection efforts.

Deputy General Director - Risk Management (CRO) is a member of the Executive Board, is a top-level executive responsible for overall risk management in credit, market and operational risks, who provides overall leadership, vision, and direction for Enterprise Risk Management (ERM) and develops a framework of management policies, including setting the overall risk appetite of the Bank. Responsibilities of CRO include comprehensive control of risk and continuing development of methods for risk measurement; setting risk limits and creating risk maps; communicating a clear vision of the firm's risk profile to the board and to key stakeholders. CRO has unimpeded direct access to Supervisory board, regularly reports to SB about the Bank's risk profile, its adherence to defined risk appetite, significant internal and external developments which could have material effect on bank's risks.

General Risk Management Department evaluates credit, market and liquidity risks related to various transactions or operations and draws up suggestions about modifications necessary in structure, procedures, makes assessment of expected credit losses (ECL); manages and evaluates credit, market and liquidity risks; elaborates ICAAP (internal capital adequacy assessment process), by coordinating them with the risk owners; elaborates and introduces methods of risk mitigation, specifically related to credit risk management; evaluates bank's lending performance and compares it to the past periods;

Non-financial risk management Department is an integrated part of the Bank's overall risk management activities and aims to establish sound and effective non-financial risk management practice across the Bank. Non-financial risk by definition includes operational risks as defined in the Basel III operational risk event types, but also other important risks such as cyber and information security and third party risk. The purpose of Non-Financial Risk management is to ensure enforcement of effective risk identification, assessment, monitoring and reporting tools and methodologies in order to minimize non-financial losses while supporting business development and growth; It ensures to minimize internal fraud incidents and establish environment, which aligns with the bank's business objectives.

The bank differentiates two main Non-financial risk functions: Operational Risk and Information and cybersecurity risk.

Treasury department – responsible for daily control and management of A&L structure, liquidity and funding position, interest rate gap exposures and management of foreign exchange risk exposure, reporting directly to CFO and ALCO committee for approval; Treasury department maintains appropriate limits on risk taking, adequate systems and standards for measuring risk, standards for valuing position and measuring performance, a comprehensive risk reporting and management review process, as well as effective internal controls.

Risk Strategy

At a strategic level, risk management objectives supported by the risk governance structure are:

- To define Bank's strategy based on the Group's Risk Appetite and Capital Plan
- To optimize risk return decisions by taking them as closely as possible to the business;
- To ensure business growth plans are property supported by effective risk infrastructure;
- To manage risk profile so that financial soundness remains stable under a range of adverse business conditions.

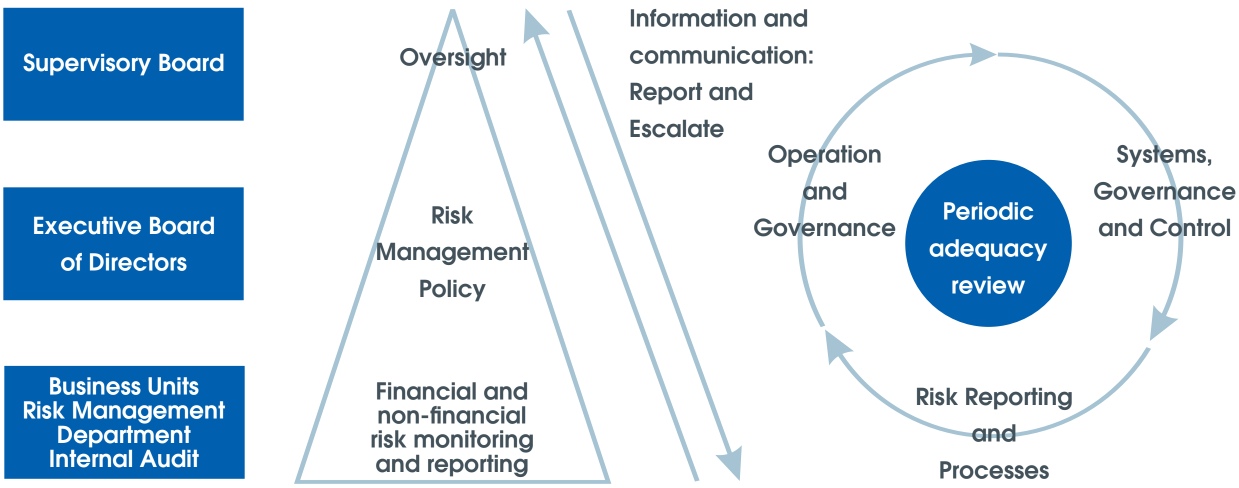
Information and communication is essential for effective Risk Governance. In BasisBank it involves inclusion of key types of data in the record keeping process, such as internal financial, operational and compliance data, as well as external market information on events and conditions relevant to decision making. An effective internal control system requires that significant risks are identified and assessed on an ongoing basis.

Risk Management

Individual policies for Credit, Operational and Anti-Money Laundering (AML) policies enable the Bank to measure, aggregate and report risk internally, as well as use this information for regulatory purposes. Further, Bank's internal methodologies and manuals provide description of processes from credit decisions - granting, pricing and approval, to portfolio management and capital adequacy.

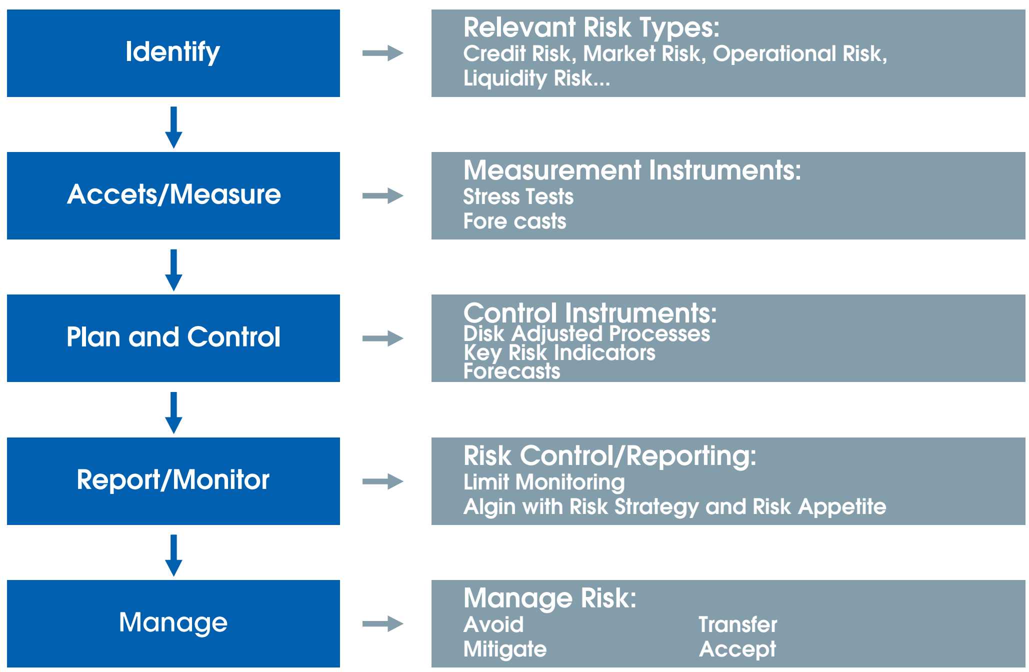
Risk Governance Continuity

Continuous Risk Governance



The Bank maintains and adheres to the best Corporate Governance standards. BasisBank is a signatory to the Corporate Governance Code for Commercial Banks adopted by the Banking Association of Georgia (CG Code) in 2009. Our operations are regulated and supervised within banking supervision framework by NBG which focuses on licensing, capital adequacy, liquidity requirement, risks' concentration, Corporate Governance Code as well as organizational and reporting requirements. Supervision framework also provides guidelines for the regulation of Risk management in Commercial banks, risk governance principles, internal control systems, etc.

Management reporting system is build up to serve as an effective tool for risk governance. Risk management processes are constructed in a way that they support the execution of the risk strategy in the daily activities, so that risk management becomes a continuous process of creating transparency and risk mitigation. In pursuit of its objectives, risk management is segregated into five discrete processes: identify, assess, control, report and manage/challenge. All material risk types, financial, as well as non-financial risks: including credit risk, market risk, operational risk, liquidity risk, regulatory risk and reputational risk, inherent in the financial business, are managed via dedicated risk management processes. Modelling and measurement approaches for quantifying risk and capital demand are implemented across all material risk types.



Risk Appetite and Key Risk Types

Risk appetite is the amount of risk that an organization is prepared to accept, tolerate, or be exposed to at any point in time. As it is evident that risk inherent in the operations of the Bank cannot be reduced to zero, based on careful cost-benefit analysis, the Bank has to elaborate its risk tolerance framework.

Management of each material risk types are defined within the Risk framework of the Bank. Risk appetite of BasisBank has been set as a limit system which enables the Bank to continuously monitor the exposure to the relevant risk factors. The limit system considers all relevant risk types identified during the ICAAP processes.

The limits are defined by the Management Board and have to be in line with strategic planning and external requirements (legal requirements on capital and liquidity; Group level/owner requirements). The Bank considers risk assessment in a systematic way, which is achieved via different stress tests and Internal Capital Adequacy Assessment Process (ICAAP). Capital adequacy ratio, Liquidity Position, market risk are assessed within the regularly performed benchmark analysis and under more severe stress tests conditions.

The risk map of the institution shows the complete picture of all risk types evaluated in BasisBank under the ICAAP. For each type of risk its relevancy is assessed and the methodological approach to measure and mitigate the risk is outlined in the ICAAP policy document.

If the risk is considered significant and it is quantifiable, the Bank has to define internal methodology to calculate the respective capital needed to cover the risk. Other relevant risk types that cannot be quantified are to be treated through appropriate internal processes. Internal processes shall aim to minimize potential losses arising from non-quantified risk types. If the risk is found irrelevant, no special treatment is necessary.

However, the regular review of ICAAP ensures that at least yearly all risk types are assessed, and risk types that were irrelevant and became relevant over time are addressed in an appropriate matter.

Key Risk Types: Identification and Assessment

The Group is committed to have a comprehensive risk management process in place that effectively identifies, measures, monitors and controls all risk exposures, as the Group wants to avoid high volatility in its earnings and net value due to events arising from the poor reactions to changes in the competitive environment and/or erroneous corporate decisions. The Group is committed to mitigate potential risks by the adequate, well-elaborated business strategy and manage inherent risks via developing systems of early risk detection and internal policies and procedures to ensure risk-aware decisions and actions in its day-to-day business activities.

On bank level the group monitors the following risk exposures:

Financial risk comprises credit risk, market risk (including currency risk, interest rate risk and price risk), and liquidity risk. The primary objective of the financial risk management function is to establish risk limits, and then ensure that exposure to risks stays within these limits.

Credit risk. The Group exposes itself to credit risk, which is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to meet its obligations. Exposure to credit risk arises as a result of the Group's lending and other transactions with counterparties, giving rise to financial assets and off-balance sheet credit-related commitments. Credit risk is obviously the most important type of risk for banks and banks' supervisory authorities. The Bank's credit strategy is to create diversified and profitable loan portfolio while maintaining maximum quality.

Credit risk management. The estimation of credit risk for risk management purposes is complex and involves use of models, as the risk varies depending on market conditions, expected cash flows and the passage of time. The assessment of credit risk for a portfolio of assets entails further estimations of the likelihood of defaults occurring, associated loss ratios and default correlations between counterparties.

Management of Credit Risk in BasisBank includes different activities embedded in the daily activities.

Establishment of an appropriate credit risk management environment - In BasisBank this is achieved through written Credit Policy and Credit Manual related to target markets. In this formalized documents portfolio mix, price and non-price terms, the structure of limits, approval authorities and processing of exceptions and management reporting issues are addressed and outlined.

The Group structures the levels of credit risk it undertakes by placing concentration limits on the amount of risk accepted in relation to one borrower, or groups of borrowers, and to geographical and industry segments. Limits on the level of credit risk by product and industry sector are approved regularly by management. Such risks are monitored on a regular basis and are subject to an annual, or more frequent, review.

Credit risk, both at portfolio and transactional levels, is managed by a system of Credit Committees to facilitate efficient decision-making. A hierarchy of credit committees is established depending on the type and amount of the exposure. Loan applications originating with the relevant client relationship managers are passed on to the relevant credit committee for the approval of the credit limit.

Sound credit-granting process. In Basis Bank this involves the consideration of a number of factors in credit granting. Depending on the type of credit exposure and the nature of the credit relationship, these could be the purpose of the credit and sources of repayment, the current risk profile of the borrower or counterparty and collateral and its sensitivity to economic and market developments, the borrower's repayment history and current capacity to repay, historical financial trends and future cash flow projections. During the credit analysis, consideration is given to the borrower's business expertise, the borrower's economic sector and its position within that sector. These elements are part of scoring models developed for both, Retail and Corporate business lines. Corporate and Retail Credit Risk Management Departments (under Risk Management Division) take part in credit risk assessment of the client. For Individual borrowers the bank has developed simplified scoring model, which enables the Bank to assess the credit repayment capacity of the borrower, based on the analysis of financial standing of the borrowers and their past repayment history. The scoring for retail and corporate is used primarily in the credit approval process for pricing purposes: pricing of each loan is risk adjusted, based on the scoring of the client and riskiness of the product.

Credit risk grading system. For measuring credit risk and grading financial instruments by the amount of credit risk, the Group applies an Internal Rating System for legal entities, or risk grades estimated by external international rating agencies (Standard & Poor's - “S&P”, Fitch, Moody's) for Central Governments, Interbank exposures, International Financial Institutions (IFIs) Securities and other financial assets, when applicable.

Risk Mitigation and Residual risk. Exposure to credit risk is also managed, in part, by obtaining collateral as well as corporate and personal guarantees to mitigate the credit risk. The limits for collateral coverage are different depending on product type and borrower segment. To reduce the potential residual risk of collaterals, the Bank uses discounts on the market value of the collaterals when calculating collateral coverage during the lending processes and during portfolio management. The Group obtains collateral valuation at the time of granting loans and annually re-evaluates real estate properties pledged for the loans which are included in top 100 borrower group list by carrying amount as at reporting date. Apart from top-100 borrower groups, for the loans with carrying amount more than GEL 100 thousand, the Group requests re-evaluation of the pledged real-estate collaterals if a new loan is disbursed under the pledge of the given collateral or in case of restructuring of the given commitment in case the last valuation is more than 1 year ago. During 2021 the Bank has re-evaluated representative sample of all collaterals that were left out of scope of mandatory yearly re-evaluations. This process has not revealed any significant deviations from the value according to the last valuation acts. Legal Department regularly (at least yearly) reviews the collateral contract template and modifies if necessary based on new regulation environment or experiences on the execution of collaterals. Minimum collateral coverage (maximum amount of unsecured portfolio) using discounted values are defined for each customer types by the Credit Policy.

Provision assessment.

Starting from 1 January 2018, the Group assess credit risk and allocates provisions for expected losses according to IFRS 9. Loss reserves for asset and other contingent liabilities must be sufficient to cover all expected losses in the Bank's credit portfolio. Key risk parameters, taken into account in the scope of loss allowance calculations are: (a) the probability of default (PD) by the counterparty on its contractual obligations; b) expected losses in case of default of a counterparty (LGD) and Exposure at Default (EAD). Forward-looking information is included in the final ECL (expected credit loss) assessment. IFRS9 allows financial institutions more precise assessment of loan-loss provisions and allowances by means of incorporating forward-looking information obtainable without undue cost or effort. ECL assessment approach under IFRS 9 takes into consideration past events, current conditions and forecasts of future economic conditions in the process of ECL estimation. The bank has incorporated macroeconomic forecasts, published by National Bank of Georgia in the internal impairment models.

Governance over the Expected Credit Loss (ECL) calculation process is shared between Financial Reporting and Risk functions. Under IFRS9, validation and back-testing of all applied parameters and significant assumptions is an inherent part of ECL assessment process. The Group regularly reviews its methodology and assumptions to reduce any difference between the estimates and the actual loss of credit. Under IFRS9, validation and back-testing of all applied parameters and significant assumptions is an inherent part of ECL assessment process. The results of back testing the ECL measurement methodology are communicated to Group Management and further steps for tuning models and assumptions are defined after discussions between authorised persons.

During 2021 the Group has performed back-tests of the assumptions, thresholds and risk parameters used in IFRS9 impairment model, in order to assess the adequacy of forecasts for financial year 2021 as estimated by the IFRS9 impairment models at the end of previous year. No modifications have been deemed necessary to be made based on the results of performed back-tests: models used by the Bank adequately predict ECL.

COVID-19 caused great uncertainty on the worlds' markets and greatly affected Georgia's economy as it is strongly dependent on the external markets and therefore another important part of ECL assessment process during 2020, was incorporation of the expected negative effect through Covid-19 pandemic in final ECL estimates.

By the end of 2021, grace period has ended for more than 80% of the portfolio which has previously used covid grace periods. In particular, grace period has ended for all covid loans in retail segment. Only 3% of this portfolio is in PAR30 overdue as of the end of 2021, which is comparable with the PAR ratios of pre-pandemic levels.

Business portfolio, especially clients active in Hotels and Restaurant sectors are still in grace period as of December'2021, with the expected renewal of payments in summer of 2022.

Overall, after almost 2 years in pandemic and most of the businesses reopened, it can be concluded, that the effect of the pandemic on the BB's portfolio was less severe, as assumed at the beginning of the pandemic. Apart from recoveries seen on old problematic clients, reversal of ECL booked in 2020 in anticipation of possible losses due to pandemic has significantly contributed to decrease of ECL as of 2021.

In October'2021 the Bank has restored or capital buffers to pre-pandemic level.

Stress testing. The Bank regularly performs regular stress tests to monitor impact of adverse macroeconomic, as well as bank specific events on regulatory capital buffer and on bank's performance as a whole or at different levels of aggregation. Stress tests are used as an effective tool of risk assessment and management, in order to assess its capital adequacy and in case of need create additional capital buffer for adverse changes. Stress tests amongst others cover events of broad economic crises with recession, impact of currency movements, decrease in employment levels, sector specific stress tests, closing of export markets (political risks), and default of several large exposures.

In 2021 Bank has also developed new tool for preventing /addressing severe stress situations, namely under recovery planning regulation (Introduced by NBG) banks were required to stress its resilience against more severe and wide-ranging adverse scenarios, than under normal stress testing process . Scenarios had to be developed in such way, that to be severe enough that is, if, in the absence of recovery options, the negative events would lead an institution to near default. Bank developed one system wide and one idiosyncratic stress scenario with wide ranging stress events and tested adequacy of its recovery options. As result recovery options and recovery plan as a whole proved to be adequate under both high severe scenarios.

Maintenance of appropriate credit administration, measurement and monitoring processes involves regular monitoring of a number of key items related to the condition of individual borrowers. These items include the current financial condition of the borrower or counterparty, compliance with existing covenants, collateral coverage and contractual payment delinquencies. Also, it involves the monitoring of share of exposure in the total loan portfolio to specific types of borrowers to avoid risk concentration. Such concentrations occur when there are high levels of direct or indirect loans to a single counterparty, a group of interrelated borrowers, or a particular industry or economic sector.

Maintenance of appropriate portfolio quality reporting. Portfolio quality and lending limits determined by Credit Policy are regularly followed by the Credit Risk Management in its control function and presented to the management of the Bank via portfolio reporting. Portfolio report contains information about the distribution of the portfolio over the rating classes, amounts in delays, exposures by sectors and HHI index, dynamics of PD, LGD figures, etc. In order to monitor exposure to credit risk, regular reports are produced by the dedicated staff of Financial Reporting and Risk departments based on a structured analysis focusing on the customer's business and financial performance. Any significant interaction with customers with deteriorating creditworthiness is reported to and reviewed by the Risk Committee, the Management Board and Supervisory Board.

Market and liquidity risks are managed by the Asset and Liability Management Committee (ALCO) in coordination with the Treasury Department and the Risk Management department. The Treasury Department performs monitoring by holding regular meetings with operational units in order to obtain expert judgments in their areas of expertise, executes the daily control of liquidity gaps, interest rate exposures, and controls and manages foreign exchange risk exposure.

Market Risk. The most likely sources of market risk are interest rate risk and foreign exchange rate risk.
Interest rate risk is the current or prospective risk to both the earnings and capital of institutions arising from adverse movements in interest rates. From a credit institution's perspective, an interest rate risk may occur for both its trading book portfolio and banking book transactions (traditional credit/deposit and investment transactions).

Types of interest rate risks relevant for the Bank are:

- Re-pricing risk, i.e. risk deriving from the different maturity structure of receivables and payables and from pricing that is based on different interest rates or different periods. A re-pricing risk is generated when there is a mismatch between the maturity structure of assets and liabilities and if pricing takes place at different intervals or at differently based interest rates (e.g. receivables at a fixed interest rate and liabilities at a variable interest rate).

- Yield curve risk, i.e. risk originating in changes of the shape and steepness of the yield curve.

Foreign exchange risk rises from an open or imperfectly hedged positions in a particular currency as a result of unexpected movements in the level of exchange rates (that may lead to losses in the local or reporting currency of the market participant).

Oversight and control of market risk is set out to ensure that the bank's policies and procedures for managing interest rate risk and FX risk on both, long-term and day-to-day basis are adequate and that clear lines of authority and responsibility for managing and controlling market risk are maintained. The Bank maintains a comprehensive interest rate risk reporting and review process, as well as effective internal controls, sets appropriate limits on risk taking, establishes adequate systems and standards for measuring risk and performance, valuing position, reprising maturity gap.

Liquidity Risk. Liquidity risk is defined as the risk of inability of the bank to honour its financial obligations under normal or stressed conditions. Liquidity is the ability of the Bank to fund increases in assets and meet obligations as they come due, without incurring unacceptable losses. The fundamental role of banks in the maturity transformation of short-term deposits into long-term loans makes banks inherently vulnerable to liquidity risk, affects markets as a whole. Virtually every financial transaction or commitment has implications for a bank's liquidity. Effective liquidity risk management helps ensure a bank's ability to meet cash flow obligations, which are uncertain as they are affected by external events and other agents' behaviour.

The bank relies on Basel 3 liquidity management methodologies and on other internal assessment models developed in line with best international practice and manages liquidity risk according to the internal policies of Anti-Money Laundering (AML) and Liquidity Management, with detailed definition of processes and limit systems connected to liquidity management (cumulative maturity mismatch limit, Liquidity Coverage Ratio (LCR), Net Stable Funding Ratio (NSFR)).

Liquidity management process includes establishment and regular re-assessment of liquidity requirements based on the bank's asset and liability structure and general market conditions; development and control of corresponding liquidity risk limits; addressing funding structure and mismatch volume, fund raising capacity, etc.; developing and monitoring liquidity and fund management principles; liquidity forecasting under normal business conditions and for stressed scenarios; developing contingency plan which is to clearly set out the strategies for addressing liquidity shortfalls in emergency situations.

Operational Risk.

Operational risk is defined as the risk of financial loss resulting from inadequate internal policies, system and control failures, human errors, fraud or management failure, external events and natural disasters. The bank is exposed to number of operational risks, including internal and external fraudulent activities, breakdowns in processes, procedures or controls; and system failures from an external party with the intention of making the bank's supporting infrastructure unavailable to its intended users, which in turn may jeopardize sensitive information and the financial transactions of the bank, its clients, counterparties or customers. Further, the bank is subject to risks that cause disruption to systems performing critical functions arising from events beyond its control, that may result in losses or reductions in service to customers and/or financial losses to the bank.

The risks discussed above are also relevant where the bank relies on outside suppliers of services, because the bank may not have direct control of the activity performed by the third party.

Considering the extent and complexity of the fast-changing environment of both banking services and associated possible operational risks, the importance of improving processes, procedures, controls and systems is crucial to ensure risk prevention. To oversee and mitigate operational risk, the bank established the operational risk management on three levels in the Bank: business units/departments level, Operational Risk Management level and Internal Audit level. The operational risk management division acts as second line of defence.

The Bank's Operational Risk policy is an overarching document that outlines the general principles for effective operational risk principles. It has been developed in accordance with Basel Committee "Principals for Sound Management of Operational Risks", issued in July 2011, and the overall risk strategy of the bank. The policy also considers requirements of the National Bank of Georgia ("Regulation of Operational Risks Management by Commercial Banks issued in June 13, 2014). It is an integrated part of the Bank's overall risk management activities, defines major risk management principles and tools for how operational risk is to be identified, assessed, monitored, and controlled or mitigated, that should be reflected in respective risk management policies of the bank. It aims to establish sound and effective operational risk management practice across the bank activities. The policy is responsible for implementing the operational risk policy and appropriate procedures to enable the bank to manage operational risks, as well as monitoring operational risk events, risk exposures against risk appetite and material control issues.

Corresponding policies and procedures enabling effective management of operational risks are an integral part of the operational risk management policy, including a system of checks to identify strengths and weaknesses of the operational risk environment is defined and contingency and business continuity plans are in place to ensure the ability to operate as going concern and minimize losses in the event of severe business disruption. Moreover, enacting an outsourcing risk management policy, which enables the Bank to control outsourcing (vendor) risk arising from adverse events and risk concentrations due to failures in vendor selection, insufficient controls and oversight over a vendor and/or services provided by a vendor and other impacts to the vendor; Further, involving the operational risk management function in the approval process for new products and services to minimize risks relating thereto;

The Operational risk is also responsible for the day-to-day management of operational risks using various techniques. It identifies potential breaches of PDP law via analyzing customer complaints, the operational risk event databases and introduces changes in operational practices to improve personal data protection and avoid leakage of personal information in the environment of rapidly increasing automation. In order to effectively measure and manage operational risk, appropriate operational risk management environment is developed through internal reporting of operational risk as a distinct risk category related to the bank's safety and soundness on one hand, and by effective and comprehensive internal audit function, carried out by operationally independent, appropriately trained and competent staff, on the other hand.

During the unprecedented spread of covid-19, BasisBank developed a business continuity plan to ensure proper response to health issues and operational risks. The Bank has taken precautionary measures to protect the health and safety of both employees and customers, to ensure the continuity of necessary services, and to reduce all operational and financial risks. All business continuity measures are coordinated with GoG and the NBG and are based on their guidelines and instructions. Bank offices and branches operate in compliance with additional safety standards, including strict hygiene standards. The bank will continue to follow the instructions of local and international health organizations and make informed decisions.

Although the Bank calculates capital requirement for operational risk using the Basic Indicators Approach (BIA approach), some qualitative elements of more advanced risk quantification are used, which serve as a basis of more comprehensive operational risk management.

Information security/Cybersecurity Risk

Information security/Cybersecurity Risk is an effect of uncertainty on information security objectives. Information security risk is associated with the potential that threats will exploit vulnerabilities of an information asset or group of information assets and thereby cause harm to the bank. It is the risk resulting from unauthorized utilization of personal data or other sensitive information, cyber-attacks, phishing and other forms data breach. Information security, therefore, is one of BasisBank's material non-financial topics. Preserving the confidentiality, integrity, and availability of our clients' & partners' data and the bank's information assets is essential for upholding the trust placed in BasisBank by our clients, employees and stakeholder.

The threat posed by cyber-attacks has increased in recent years and it continues to grow. The risk of potential cyber-attacks, which have become more sophisticated and complex, may lead to significant security breaches. Such risks change rapidly and require continued focus and implementation of best practices. No major cyber-attack attempt has targeted to BasisBank in recent years. However, the banks growing dependency on complex IT systems increases its vulnerability and exposure to cyberattacks.

Information Security/Cybersecurity function is in charge of continuous improvement of information security and business continuity management processes, in order to minimize risks associated with information security/cybersecurity and ensure security of clients and partners.

Information Security framework is established to ensure that security policies and standards mirror evolving business requirements, regulatory guidance, and emerging cyber threats. Information security/cybersecurity corresponding policies support the bank in complying with these parameters and build the foundation for actively managing and governing information security-related implementation processes. International standards and best practices are used to structure the bank's comprehensive information security policy landscape.

Information Security/Cybersecurity function is mandated to ensure that the appropriate governance framework, policies, processes, and technical capabilities are in place to manage the related information security/cybersecurity risk within the bank. Information Security/CyberSecurity function works with every business division/unit and all employees of the bank to ensure the bank's systems are protected as well as used safely and securely to achieve the banks business objectives.

At least once a year, a full information security and cyber security audit as well as cyber security framework analysis is performed by an external consultant to assess the efficiency of the bank's capabilities against industry best practices and real world cyber-attack scenarios, taking into consideration the relevant regional and sector specific perspectives. The audit gives the bank a broad review as well as a detailed insight, which helps to further enhance the information and cyber security systems. In addition, penetration test exercises are performed on a regular basis.

Bank employees play a crucial role in information security. As a result, regular training sessions are conducted for employees, which are comprised of remote learning courses on security issues, fraud and phishing simulations as well as informative emails to further assist our employees with information security matters. These measures ensure that employees are fully aware of their responsibilities and are prepared for various security threats.

As a result of the COVID-19 pandemic, the Bank activated secure remote working policies, which ensure that homeworking environments are protected against relevant cyber-threats and IT team provides effective oversight of teleworking channels.

Anti-Money Laundering and Counter Terrorist Financing (AML/CTF); Anti-Bribery and Anti-Corruption (ABC); Potential Conflict of Interest: BasisBank has adopted a holistic approach to Financial Crime and created the group-wide anti-financial crime (AFC) framework, which sets the control requirements in the following key risk areas: AML/CTF, ABC and avoiding potential conflict of interest. This combined approach allows the Bank better to understand of their risk exposure and prioritize the management focus. In line with its AFC framework, BasisBank takes a zero-tolerance approach to intentional facilitation of money laundering and terrorist financing, as well as to bribery, fraud and corruption.

For preventing money laundering and terrorist financing across the Bank, there is established the Financial Monitoring Unit. While AML/CFT control, there are used following measures/tools: Know Your Customer, Customer Due Diligence and Enhanced Due Diligence measures; ML/TF Risk assessment/reassessment; Information renewal according to the risk level; black and PEP List screening; red flag control etc. Part of monitoring measures are automated, incl. black and PEP list screening, red flag control, reveal of suspicious transactions etc.

The Bank does not tolerate any form of corruption, bribery or fraud, or any other type of illicit, fraudulent or unethical behavior. All employees are personal accountable to protect the Bank, its reputation and themselves from the risks arising from bribery and corruption and avoid consequences of non-compliance. Anti-Bribery & Anti-Corruption Policy defines main principles, rules and standards of behaviour upon which are based Bank's everyday activities, in order to reasonably prevent, detect and report bribery and corruption incidents enterprise wide. Internal audit, Financial Monitoring Division, Compliance and Operational Risk Management Units are responsible for ensuring compliance with the AFC framework, making sure that the internal regulations and working principles are integrated into all of the Bank's activities.

Corporate Compliance Risk: is a risk of sanctions, financial or reputational losses and legal litigations which could be affected by ignoring current legislation and standards of conduct. Compliance risk management system comprises of compliance policy, description of legal and statutory acts regulating the banking activity, regularly revising of compliance with specified requirements as well as reporting to Supervisory Board and Directorate and facilitating in making informed decisions by the Management. For enforcement of compliance policy as well as for effective functioning of compliance risk management, the Bank established the Compliance Unit. In line with the Bank's integrated control framework, the bank carefully evaluates the impact of each legislative and regulatory change as part of its formal risk identification and assessment processes. Among other duties, the unit is anticipating, detecting, assessing and controlling significant/potential risks related to non-compliance.

The Bank wants to avoid high volatility in its earnings and net value due to events arising from the poor reactions to changes in the competitive environment and/or erroneous corporate decisions. Therefore, the Bank is committed to mitigate potential risks by the adequate, well-elaborated business strategy and manage inherent risks via developing systems of early risk detection and internal policies and procedures to ensure risk-aware decisions and actions in its day-to-day business activities.

Within the scope of ICAAP framework, the Bank assess other risks to which the bank can be exposed, some of these risks are described below:

Business Risk means current or prospective risk of earnings and capital decrease arising from changes in the business environment and from adverse business decisions, or from the overlooking of changes in the business environment, inadequate implementation of decisions or poor reactions to changes in the competitive environment.

The management of environmental and social risks includes, on the one hand, efficient consumption of natural resources and responsible waste management in the daily business activities of the bank, and integration of responsible financing principles in the bank's lending activity on the other.

In order to effectively implement responsible financing principles, in 2018 BasisBank made significant changes in its environmental and social risk management policy by developing the Due Diligence and E&S Risk Assessment procedures. The bank also introduced the exclusion list. It specifies the types of the activities that the bank does not finance. The activities on the exclusion list can be, in some way, linked to production/trade of weapons and military materials, forced and child labour, illegal pharmaceuticals, production/trade of certain pesticides and herbicides, gambling and casinos, etc. These documents are based on the active Georgian legislative framework, best practice and recommendations of the international financial institutions.

As part of the environmental and social risk assessment process, all business loans are subject to standard procedure of verifying the project in the exclusion list. At a later stage, based on the data and documents provided by the client, assessments after the onsite visit, and information received from independent sources, the responsibility of the potential client is assessed, along with the client's degree of environmental and social risk management. The bank refers to the IFC's Environmental and Social Performance Standards for its assessments. The bank is also empowered to set covenants for the client for the purpose of enhancing the client's environmental and social responsibility (e.g. improvement of the fire safety system and upgrade of working conditions).

Country Risk refers to potential losses that may be generated by an (economic, political, etc.) event that occurs in a specific country, where the event can be controlled by that country's government but not by the credit grantor/investor. The Bank implemented limit system by introducing Country Risk Management Policy in order to measure its exposure to country risk based on the external rating of the countries.

Reputation Risk may originate in the lack of compliance with industry service standards, failure to deliver on commitments, lack of customer-friendly service and fair market practices, low or inferior service quality, unreasonably high costs, a service style that does not harmonize with market circumstances or customer expectations, inappropriate business conduct or unfavorable authority opinion and actions.

The Bank wants to avoid high volatility in its earnings and net value due to events arising from the poor reactions to changes in the competitive environment and/or erroneous corporate decisions. Therefore, the Bank is committed to mitigate potential risks by the adequate, well-elaborated business strategy and manage inherent risks via developing systems of early risk detection and internal policies and procedures to ensure risk-aware decisions and actions in its day-to-day business activities.

CORPORATE GOVERNANCE

CORPORATE GOVERNANCE

In the pursuit to deliver greater shareholder value, BasisBank has continued to subject its operations to the highest standards of Corporate Governance, which is an essential foundation for sustainable corporate success, especially in an emerging market economy. We are committed to upholding the principles of good Corporate Governance in all our operations which is the basis of strong public trust and confidence reposed in us by shareholder, customers, business partners, employees and the financial markets and the key to our continued long-term success even in the face of the Covid-19 pandemic.

Our internal Corporate Governance framework provides a robust system for the governance of the Board and the Bank. The Bank ensures compliance with the Corporate Governance Code for Commercial Banks adopted by the National Bank of Georgia (NBG), with the NBG Code of Ethics and Standards of Professional Conduct as well as the principles on Corporate Governance for banks issued by the Basel Committee and various other standards and guidelines related to the implementation of good Corporate Governance. The Bank's Corporate Governance framework is continuously reviewed to align with additional legal and regulatory requirements and global best practices.

In line with the principles of above-mentioned regulations, the Bank established CG structure suitable with the size, complexity, structure, economic significance, risk profile and business model of the Bank and its Group.

During the 2021 financial year the Bank executed various governance activities which included the following: the review of the Bank's Corporate Governance documents incl. charters of the Governing Bodies and Board Committees, internal by-law of the Bank as well as Compliance Policy in order to align same with leading international practices and existing regulations. The Supervisory Board and its Committees also carried out annual self-assessments to review compliance with the terms of reference as contained in their respective internal regulations.

GOVERNANCE STRUCTURE

Shareholder

Shareholder exercises its rights and responsibilities through the General Meeting. The General Meeting of Shareholders is the supreme governing body of the bank, by participating in the Meeting, shareholders exercise their rights of bank membership in compliance with the legislation of Georgia and the Bank Charter. General meeting takes decisions on the most important issues - approves the bank's charter, makes decisions on issuance of shares, distribution and usage of earnings, on changes in the bank's capital and makes decision on appointment and / or dismissal of the Board members.

Supervisory Board

The Supervisory Board (the Board or SB) is the body supervising the Group's activities, exercising its functions through the Board Meeting and Board-level Committees. The Board appoints and works closely with the Management Board, supervises and advises on important issues and is directly involved in fundamental decisions.

The key functions of the Supervisory Board are supervision of the BasisBank Group's activities, Corporate Governance and Risk Management. Within the framework of these functions, the Board makes decisions on establishing the group's values, organizational structure and generally, ensuring that the group is governed in full compliance with the principles of fairness, competence, professionalism and ethics; establishes the group's strategy and oversees management's implementation of the bank's strategic objectives; ensures that the group is in compliance with all regulatory and supervisory requirements; establishes the risk appetite of the company along with Management Board and the CRO (Deputy General Director on risk management). The Board also oversees Management Board's activities and evaluates Management Board's decisions, ensuring independence and effectiveness of control functions, and conducts Management Board's performance evaluation in line with its long-term succession plan. The Board is responsible to oversee transactions with related parties and ensure existence of effective procedures and policies within the group in line with the requirements of law and regulatory framework.

The SB adheres to and comply with requirements and principles of the Law of Georgia on Commercial Banks Activities, the Corporate Governance Code for Commercial Banks, the Code of Ethics and Standards of Professional Conduct, and internationally recognized standards in their work.

Board meetings are based on the principles of open dialogue, accountability and transparency, and members have the opportunity to be fully involved in the work process. Decisions are made in a transparent manner, with all members being equally involved in the dialog and decision-making process, except for the exclusion provided by the Bank's internal regulation on the Management of Conflict of Interests. Board's decisions as well as related material are submitted to the National Bank of Georgia on an ongoing basis.
The Supervisory Board held 25 regular and ad-hoc meetings in 2021.

The Board Members

The Board consists of five members, two of which are independent members of the Board. All members of the Supervisory Board are selected in accordance with the eligibility criteria set by the National Bank of Georgia. Board members are elected by the General Meeting of Shareholders.

The board's composition is an appropriate mix of knowledge, skills and experience that aligns with the Bank's strategy. The diversity of gender, age, nationality and functionality ensures different views in the process of discussion, evaluation from different perspectives and increases Board's performance.

The members of our Supervisory Board are: Mr. Zhang Jun – the Executive Chairman of the Board, Mr. Zhou Ning – Vice Chairman (an independent member), Mr. Mi Zaiqi - Vice Chairman, Mr. Zaza Robakidze – Member (an independent member), Ms. Mia Mi – The Board Member.

Zhang Jun

Chairman of the Supervisory Board

Zhang Jun holds an MBA. 2010 to present: Deputy General Manager in finance and foreign investments at Xinjiang Hualing Trade and Industry (Group) Co., Ltd. 1998 to 2010: worked as Sales Department General Manager, Assistant to the Chairman of the Board, HR Director in Urumqi City Commercial Bank. 1992 to 1997: Deputy Director in Chengxin Credit Union of Urumqi. Mr. Zhang held senior managerial positions at Urumqi Branch of the People's Bank of China, Urumqi City Commercial Bank and other financial institutions for many years. He has extensive practical experience in the operation and management of commercial banks, hence the profound and clear view of the strategic development of small and medium-sized commercial banks.

Zhou Ning

Vice Chairman of the Supervisory Board, Independent Member

Zhou Ning holds an MBA from Fuqua School of Business in USA, MS in Engineering from Virginia Polytechnic Institute, and BS in Engineering from the University of Science and Technology of China. 2005 to present: Managing Director in Tuhong International Co. Having implemented a number of financial advisory projects at Urumqi City Commercial Bank, Bank of Deyang, Yantai Bank, Hang Seng Bank, Wing Lung Bank, Xiamen Bank, Hong Kong Fubon Bank and Bank of Tianjin, Mr. Zhou has an in-depth understanding of strategy and business development of domestic and foreign small and medium banks.

Mi Zaiqi

Vice Chairman of the Supervisory Board

Holds a BA from University of California. 2011 to present: Deputy Director of GM Office in Xinjiang Hualing Trade and Industry Group Co., Ltd and Director of GM Office in Georgia Branch Office of Xinjiang Hualing Trade and Industry Group Co., Ltd. 2010-2011: worked as an assistant to GM in Xinjiang Hualing Real Estate Development Co., Ltd. 2005 to 2006: worked as an assistant to GM at Xinjiang Hualing Grand Hotel Co., Ltd.

Mia Mi

Member of the Supervisory Board

Holds a bachelor's degree in Business Administration from University of Southern California, Los Angeles. Director of International Development at Hualing Group International Special Economic Zone in Georgia. Extensive experience in assisting Chairman of JSC Hualing International Special Economic Zone in 2 crucial actions: acquisition of BasisBank in 2012 and each year (2011-2015) organizing international construction materials fair, connecting buyers and sellers from across Central Asia. 2015-2017, Mia Mi held various positions in key departments at BasisBank, analyzing loan portfolio, communicating with Chinese corporate and retail clients as well as Banks shareholders, organizing major corporate events and assisting HR in recruiting talents.

Zaza Robakidze

Independent Member of the Supervisory Board

Zaza Robakidze, a proficient banking expert with over 24 years of sector experience, accepted the position of the Member of Supervisory Board in late 2018. He has also been serving as Chairman of BasisBank's Audit Committee since 2012. Zaza Robakidze spent several years working at the National Bank of Georgia on various positions, from Economist to Head of Supervision Department. Zaza Robakidze holds a master's degree in Economics.

Supervisory Board - level Committees. The Board delegates specific areas of responsibility to its committees: the Audit Committee and the Risk Management Committee. The functions of the committees are separated from each other, the issues are not discussed in duplicate. The committees report regularly to the Supervisory Board and facilitate informed decisions by the Board.

The Committees have unrestricted access to the Bank's internal information and documents related to any matter within the competence of the Committee.

The committees have full access to the Management Board and the risk management functions, however, they have the opportunity to meet independently, without the presence of the members of the Management Board, the employees of any unit of the bank as well as and external auditors, and to request and receive reports.
The committees have the right and opportunity to independently invite external consultants, and, if necessary, to receive consultations and services on legal, technical, accounting, financial, risk management, statistical and other issues.

Audit Committee. The Audit Committee is established by the Supervisory Board members and two of the three members are independent.

During the reporting period, the Audit Committee convened 6 times, and among others, was responsible for:
- Ensuring the adequacy and efficiency of the functions of the bank's internal and external auditors; within that, setting of the scale and scope of the internal audit;
- Oversight and monitoring the quality of the Bank's accounting and financial reporting;
- Ensuring that the Management Board takes necessary steps to correct the identified control weaknesses, non-compliance with the legislation and other deficiencies;
- Ensuring the framework of the risk management and efficiency of internal controls;
- Review of the annual consolidated and separate financial and non-financial statements of the banks, discussion of the audited reports with the auditors, the pre-audit and post-audit processes and key issues and findings, and preparing of reports and recommendations for the Supervisory Board.
- Review of all internal documentations, the appropriateness of internal processes and control function, monitoring of the financial reporting process, data validation process, etc.

Members of the Audit Committee are: Zaza Robakidze (Chairman of the Audit committee and an independent member of the Board), Mi Zaiqi (the Board Member), and Zhou Ning (Vice Chairmen and an independent member of the Board).

Risk Management Committee - The Risk Management Committee is established by three members of the Supervisory Board, two of them are independent members.
During the reporting period, the Risk Management Committee convened 5 times, and among others, was responsible for:

- Oversight of the Bank's risk strategies and policies and their effective implementation
- Assessment and oversight of the Bank's risk profile and limits
- Oversight of the subsidiary's risk management function, risk management framework and the proper

functioning of internal control systems.

Thus, through the Risk Committee, the Supervisory Board is actively involved in the risk management process, has the proactive information and recommendations on risk limits, monitoring and evaluation results, and observes the level at which the risk management strategies and policies are integrated in the daily activities of the bank management and other business units, and also whether they are acting in compliance with the laws and internal policies.

Members of the Risk Management Committee are: Zhou Ning - Vice Chairman of the Supervisory Board, Independent Member, Mia Mi - Member of the Supervisory Board and Zaza Robakidze - Independent Member of the Supervisory Board.

Management Board

The primary function of the Management is to effectively run the group's activity, ensure uninterrupted growth and development of the bank and the Group, ensuring sustainable positioning on the market in line with the objectives set by the Supervisory Board. The SB appoints the members, their functions, the structure and the role in governance and responsibilities in line with the applicable law and terms of reference. The remuneration is clearly defined by the SB. The accountability of the management, meetings, decision making framework is defined by the Regulation on the Directorate adopted by the Supervisory Board.

The management recognizes the importance of good corporate governance and risk management culture as well as its role in these processes. The management runs operations of the Bank and is responsible for managing its activities in accordance with the Bank's objectives, in compliance with applicable laws/guidelines as well as internal regulations. The Management Board works closely together with the Supervisory Board and reports to the Supervisory Board on all issues with relevance for the Bank concerning strategy, the intended business policy, planning, business development, risk situation, risk management, staff development, reputation and compliance, on systematic basis but at least quarterly.

The management is responsible for delivering business objectives in line with the group's strategy, ensuring the Bank's capital and liquidity planning, and that management policies and procedures are communicated and implemented throughout the bank and are supported by sufficient authority and resources. The management is also responsible to ensure that the bank operates consistently with the processes and procedures set out in its internal and external regulations, allocations of resources, planning, managing, accounting and reporting of financial and risk position, properly executing the management and control functions.

Management Board consists of General Director, his Deputies and other Directors.

Management Board of the Bank consists of 7 members: David Tsaava, General Director; Lia Aslanikashvili, Deputy General Director, Finance; Hui Li, Deputy General Director, Lending, David Kakabadze, Deputy General Director, Risk Management, Levan Gardapkhadze, Deputy General Director, Retail; George Gabunia, Chief Commercial Officer and Rati Dvaladze, Chief Operational Officer.

David Tsaava

General Director

General Director of BasisBank since 2011. 2015-2018: Member of BasisBank Supervisory Board. Since December 2017 David Tsaava has been serving as Supervisory Board member of BB Leasing and BB Insurance, the subsidiaries of BasisBank Group.

David Tsaava started his career at BasisBank as a loan officer in 2004. Later, till 2008, he headed the Corporate Loan Division. In 2008-2010 David Tsaava was appointed as Corporate Director. In 2010-2011 he was an acting General Director.
After obtaining a bachelor's degree in Banking and Finance from Tbilisi State University, David Tsaava got a master's degree at Sokhumi State University. Later, he obtained a PhD in Business Administration from Technical University of Georgia.

Lia Aslanikashvili

Deputy General Director, Finance

BasisBank's Deputy General Director, Finance since 2012. 2017-2018: General Director of BB Leasing, the subsidiary of BasisBank Group. 2017-present: Deputy General Director, Finance at BB Leasing and BB Insurance, the BasisBank Group member companies.
Lia Aslanikashvili served as Manager at International Operations Department of BasisBank in 1999-2002. In 2002-2005, she headed the same department. In 2005-2008, headed the Settlement Department. In 2007-2008, Lia Aslanikashvili led the Treasury Department. In 2008-2012, she was a CFO of BasisBank.
Lia Aslanikashvili holds a master's degree in International Economic Relations from Tbilisi State University.

Li Hui

Deputy General Director, Lending

BasisBank's Deputy General Director, Lending since 2012. 2015-2018: Member of BasisBank's Supervisory Board. Supervisory Board member of BB Leasing and BB Insurance, the BasisBank Group member companies, since 2017. Li Hui has been working in the financial sector since 1993. In 2005-2012 she was in charge of loan approval in Credit Management Department of Urumqi City Commercial Bank. At different times, she held the position of Deputy Manager of Credit Department and Deputy Director in Urumqi Chengxin Credit Cooperatives.
Li Hui holds a bachelor's degree in Accounting from Financial University of China.

David Kakabadze

Deputy General Director, Risk Management

BasisBank's Deputy General Director, Risk Management since 2019. 2017-2019: General Director of BB Insurance, the subsidiary of BasisBank Group. 2017-2018: Deputy General Director of BB Leasing, the BasisBank Group member company.
David Kakabadze has been with BasisBank since 2003, initially serving as an IT developer/ programmer. In 2005, he was appointed as Head of IT Programming Division. In 2008-2012 David Kakabadze became Director of IT and Risk Management. In 2012-2019 he served as BasisBank's Deputy General Director, Risk and IT Management.
David Kakabadze holds a Master's Degree in Finance from Caucasus Business School.

Levan Gadrapkhadze

Deputy General Director, Retail Business

BasisBank's Deputy General Director, Retail Business since 2012. 2017-2018: Deputy General Director of BB Leasing and BB Insurance, the BasisBank Group member companies.

Levan Gardapkhadze started his career at BasisBank as International Operations Department Manager. In 2005 he was appointed as Head of Plastic Cards Department. In 2007-2008 he chaired the Development and Project Management Committee. In 2008-2012 Levan Gardapkhadze was a Retail Banking Director.
Levan Gardapkhadze holds a master's degree in Business Management from University of Georgia, a master's degree in law from Tbilisi University of Economics, Law and Information and a bachelor's degree in International Economics from Technical University of Georgia.

George Gabunia

Chief Commercial Officer (CCO)

BasisBank's CCO since 2019. In 2012-2019 George Gabunia headed the bank's commercial department. In 2010-2012 he led the corporate department. In 2008-2010 he headed the Corporate Regional Group, in 2006-2008 George Gabunia was a corporate banker. In earlier years, he worked in BasisBank's marketing and sales areas.
George Gabunia holds a master's degree in Banking from Tbilisi State University and a bachelor's degree in Finance and Banking form the same university.

Rati Dvaladze

Chief Operations Officer (COO)

BasisBank's Chief Operations Officer since 2019. In 2014-2019 he headed BasisBank's Project Management and Business Analysis Division. In 2008-2014 he worked in the areas of credit risk system and analysis. Rati Dvaladze also is an educator, delivering lectures.
Rati Dvaladze obtained a master's degree in Information Technology Management from Free University and a master's degree in Physics and Mathematics from Tbilisi State University. He also holds a bachelor's degree in Mathematics.

Conflict of Interests

Based on the BasisBank's Group specifics, the Supervisory Board, the Management Board and other control functions strictly control the possible sources of the conflict of interest, including the following tools: the bank records the related parties and sets controls on the transactions with the related parties. The Supervisory Board periodically revises the policies developed and approved by it, in order to ensure compliance with the underlying challenges. In addition, the bank closely cooperates with the National Bank of Georgia to take into consideration the regulator's instructions for the creation of the robust control system.

The transactions with the related parties are subject to compulsory review and approval by the Management Board/Supervisory Board (based on the amounts). The bank strictly adheres to the arm's length principle and ensures the conformity of the related party transactions with these principles.

ESG

BasisBank has established standards for managing the Environmental and Social Impact of Lending, according to which the bank is obliged to commit to financing environmentally and socially sustainable projects, ensure that the clients comply with existing and applicable local laws and regulations concerning environmental protection, health and safety.

The internal E&S Policy defines principles of sustainable financing and sets the list of activities, which are excluded from financing. The excluded activities list includes activities associated with Weapons and munitions/paramilitary materials, forced / Child Labour, gambling etc.

E&S assessment consists of the following parts: (1) checking against the excluded activities list, (2) assessment - each credit facility issued to business clients is assigned to individual environmental risk categories. The risk categorization is based on EBRD's risk categorization document and (3) monitoring. Before financing, the Bank checks the E&S situation of the project and requests all the necessary information/permits. On the basis of these information, the project is assigned in high, medium of low E&S risk category. In case if deficiencies in environmental /social performance of client are detected, the Bank may include respective covenants to the agreement with client. Progress is monitored during monitoring visits.

As a responsible employer, BasisBank's Supervisory and Management Boards establish and communicate enterprise-wide standards for ethical behavior and integrity. The Bank's policies and procedures ensure whistleblower protection, equality, employee protection, workplace health and safety. The Bank as an employer is committed to an environment free from harassment, discrimination and to a work environment in which all individuals are treated with respect and dignity at all levels of employment.
The Bank's Management Board dedicated to maintaining compliance with all applicable labor laws and regulations as well as international labor standards.

Anti-Financial Crime (AFC) framework

BasisBank has developed a holistic approach to combating financial crime and has established a Group-wide Anti-Financial Crime (AFC) framework. This framework consists of the following key issues: anti-money laundering and counter-terrorist financing (AML/CTF), anti-bribery and anti-corruption (ABC) and the avoidance of conflicts of interest.

In view of the policies outlined above, as well as in line with current practice, it should be noted that BasisBank uses a zero-tolerance approach to intentional involvement in activities that are in some way or may be related to: money laundering, terrorism financing, bribery, fraud, corruption, insider trading and conflicts of interest.

The Supervisory Board and the Directorate explicitly require all employees (including any level employees, middle and senior level managers, permanent and temporary staff), consultants, outsource service providers and any other bank-related entity, to manage their own business fairly and in accordance with the law, adhere to the fundamental values of integrity, transparency and accountability and foster a culture of compliance where financial crimes will never be acceptable.

The Bank encourages the use of a whistleblowing system that allows both employees and customers and third parties to report violations and possible actions that are contrary to the Bank's stated policies, applicable laws, and standards of ethical conduct.

Possible incidents will be analyzed and investigated by dedicated internal Commission composed of the Head of Audit Committee, Heads of HR and Head of Compliance functions, as soon as possible, applying the principles of confidentiality and personal data protection to all those involved in the investigation process.

Internal audit, Financial Monitoring Service, Compliance and Operational Risk Management Units are responsible for ensuring compliance with the AFC framework, making sure that the internal regulations and working principles are integrated into all of the Bank's activities.

CONSOLIDATED AND SEPARATE FINANCIAL STATEMENTS OF BASISBANK GROUP

BasisBank Group

Consolidated and Separate Financial Statements and
Independent Auditor’s Report
for the Year Ended 31 December 2021

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Statement of Management's Responsibilities for the Preparation and Approval of the Consolidated and Separate Financial Statements for the Year Ended 31 December 2021

Management of JSC BasisBank (the "Bank") is responsible for the preparation of the consolidated and separate financial statements that present fairly the financial position of JSC BasisBank and its subsidiaries (collectively – the "Group") as at 31 December 2021, and the related consolidated and separate statements of profit or loss and other comprehensive income, changes in equity and cash flows for the year then ended, and significant accounting policies and notes to the consolidated and separate financial statements (the "consolidated and separate financial statements") in compliance with International Financial Reporting Standards ("IFRS").

In preparing the consolidated and separate financial statements, management is responsible for:

- Properly selecting and applying accounting policies;
- Presenting information, including accounting policies, in a manner that provides relevant, reliable, comparable and understandable information;
- Providing additional disclosures when compliance with the specific requirements in IFRSs are insufficient to enable users to understand the impact of particular transactions, other events and conditions on the Group's and the Bank's financial position and financial performance; and
- Making an assessment of the Group's and the Bank's ability to continue as a going concern.

Management is also responsible for:

- Designing, implementing and maintaining an effective and sound system of internal controls, throughout the Group;
- Maintaining adequate accounting records that are sufficient to show and explain the Group's and the Bank's transactions and disclose with reasonable accuracy at any time the consolidated and separate financial position of the Group and the Bank, and which enable them to ensure that the consolidated and separate financial statements comply with IFRS;
- Maintaining statutory accounting records in compliance with legislation and accounting standards of Georgia;
- Taking such steps as are reasonably available to them to safeguard the assets of the Group and; and
- Preventing and detecting fraud and other irregularities.

The consolidated and separate financial statements for the year ended 31 December 2021 were approved by the Management Board of the Group dated 7 March 2022.

On behalf of the Management Board:

______________________________	______________________________
David Tsaava	**Lia Aslanikashvili**
General Director	**Deputy General Director, Finances**
7 March 2022	7 March 2022

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INDEPENDENT AUDITOR'S REPORT

To the Shareholders and Management of JSC BasisBank

Opinion

We have audited the consolidated and separate financial statements of JSC BasisBank (the "Bank") and its subsidiaries (Collectively - the "Group"), which comprise the consolidated and separate statements of financial position as at 31 December 2021, and the consolidated and separate statements of profit or loss and other comprehensive income, consolidated and separate statements of changes in equity and consolidated and separate statements of cash flows for the year then ended, and notes to the consolidated and separate financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying consolidated and separate financial statements present fairly, in all material respects, the consolidated and separate financial position of the Group and the Bank as at 31 December 2021, and the Group's and the Bank's consolidated and separate financial performance and their cash flows for the year then ended in accordance with International Financial Reporting Standards ("IFRSs").

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing ("ISAs"). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Consolidated and Separate Financial Statements section of our report. We are independent of the Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (the "IESBA Code") together with the ethical requirements that are relevant to our audit of the financial statements in Georgia, 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.

Responsibilities of Management and Those Charged with Governance for the Consolidated and Separate Financial Statements

Management is responsible for the preparation and fair presentation of the consolidated and separate financial statements in accordance with International Financial Reporting Standards ("IFRSs"), and for such internal control as management determines is necessary to enable the preparation of consolidated and separate financial statements that are free from material misstatement, whether due to fraud or error.

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In preparing the consolidated and separate financial statements, management is responsible for assessing the Group's and the Banks'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 Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's financial reporting process.

Auditor's Responsibilities for the Audit of the Consolidated and Separate Financial Statements

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

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

- Identify and assess the risks of material misstatement of the consolidated and separate financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's and the Bank's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of 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 Group's and 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 consolidated and separate 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 Group and the Bank to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the consolidated and separate financial statements, including the disclosures, and whether the consolidated and separate 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 Group to express an opinion on the consolidated and separate financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

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

Srbuhi Hakobyan
On Behalf of Deloitte & Touche LLC

Tbilisi, Georgia
7 March 2022

Consolidated and Separate Statements of Financial Position
As at 31 December 2021

In thousands of Georgian Lari	Note	31 December 2021 Bank Separate	31 December 2021 Consoli-dated	31 December 2020 Bank Separate	31 December 2020 Consoli-dated
ASSETS					
Cash and cash equivalents	7	189,311	191,793	403,190	405,089
Mandatory cash balances with the NBG	8	177,579	177,579	198,238	198,238
Due from other banks	9	-	12,899	-	13,424
Investments in debt securities	10	210,399	210,699	285,333	285,633
Investment in subsidiaries	36	20,796	-	20,796	-
Loans and advances to customers	11	1,239,733	1,239,733	1,075,253	1,075,253
Finance lease receivables	12	-	9,036	-	5,108
Insurance assets	13	-	11,817	-	5,846
Current income tax prepayment	29	17	17	2,253	2,253
Other financial assets		1,272	1,356	1,294	1,336
Other assets	14	28,462	32,010	37,721	40,986
Premises, equipment and intangible assets	15	36,517	38,355	29,591	31,419
Right-of-use assets	16	4,370	4,370	4,153	4,153
TOTAL ASSETS		**1,908,456**	**1,929,664**	**2,057,822**	**2,068,738**
LIABILITIES					
Due to other banks	17	220,524	222,831	304,163	304,163
Customer accounts	18	881,804	880,179	940,377	938,715
Borrowed funds	19	429,490	429,490	477,012	477,012
Lease liabilities	16	4,745	4,745	4,812	4,812
Insurance liabilities	20	-	11,559	-	6,119
Other financial liabilities	21	2,660	3,131	5,918	6,302
Current income tax liability	22	3,214	3,214	-	-
Deferred income tax liability	29	676	676	3,068	3,075
Provisions for liabilities and charges	33	1,172	1,172	586	586
Other liabilities	22	5,012	5,700	1,978	2,696
Subordinated debt	23	15,562	15,562	16,368	16,368
TOTAL LIABILITIES		**1,564,859**	**1,578,259**	**1,754,282**	**1,759,848**
EQUITY					
Share capital	24	16,057	16,057	16,057	16,057
Share premium	24	74,923	74,923	74,923	74,923
Share-based payment reserve	25	2,440	2,440	1,842	1,842
Revaluation reserve for premises		13,588	14,426	9,165	10,003
Revaluation reserve for debt securities carried at FVOCI		(918)	(918)	173	173
Retained earnings		237,507	244,477	201,380	205,892
TOTAL EQUITY		**343,597**	**351,405**	**303,540**	**308,890**
TOTAL LIABILITIES AND EQUITY		**1,908,456**	**1,929,664**	**2,057,822**	**2,068,738**

Approved for issue and signed on 7 March 2022

_______________________________ _______________________________

David Tsaava
General Director

Lia Aslanikashvili
Deputy General Director, Finances

The notes set out on the pages 11-124 form an integral part of these consolidated and separate financial statements.

Consolidated and Separate Statements of Profit or Loss and Other Comprehensive Income for the Year Ended 31 December 2021

		2021		2020	
In thousands of Georgian Lari	**Note**	**Bank Separate**	**Consoli-dated**	**Bank Separate**	**Consoli-dated**
Interest income calculated using the effective interest method	26	132,086	133,790	121,705	123,081
Interest expense	26	(65,971)	(65,872)	(66,830)	(66,773)
Losses from modification of financial assets measured at amortised cost, that did not lead to derecognition	26	-	-	(1,914)	(1,914)
Net margin on interest and similar income		**66,115**	**67,918**	**52,961**	**54,394**
Credit loss allowance for loans, securities and interbank balances	7,8,9,10, 11	(860)	(920)	(9,935)	(10,034)
Net margin on interest and similar income after credit loss allowance		**65,255**	**66,998**	**43,026**	**44,360**
Fee and commission income	27	8,663	8,602	7,227	7,185
Fee and commission expense	27	(3,893)	(3,893)	(3,165)	(3,165)
Net insurance revenue		-	2,408	-	2,652
Net insurance claims incurred		-	(398)	-	(583)
Finance income from leases		-	1,920	-	1,629
Gains less losses from financial derivatives		(1,267)	(1,267)	(1,243)	(1,243)
Gains less losses from trading in foreign currencies		3,386	3,406	4,732	4,732
Foreign exchange translation gains less losses		1,570	1,570	(1,052)	(1,065)
Expected credi loss for credit related commitments		(60)	(60)	415	415
Other operating income, net		1,441	1,505	2,001	1,967
Administrative and other operating expenses	28	(38,157)	(41,160)	(28,656)	(31,197)
Profit before tax		**36,938**	**39,631**	**23,285**	**25,687**
Income tax expense	29	(815)	(1,050)	(1,240)	(1,466)
PROFIT FOR THE YEAR		**36,123**	**38,581**	**22,045**	**24,221**
Other comprehensive income:					
Items that may be reclassified subsequently to profit or loss:					
Gains less losses arising during the year on debt securities carried at FVOCI		(1,091)	(1,091)	173	173
Items that will not be reclassified to profit or loss:					
Revaluation gain on premises		4,423	4,423	838	838
Other comprehensive income for the year		**3,332**	**3,332**	**1,011**	**1,011**
Total comprehensive income for the year		**39,455**	**41,913**	**23,056**	**25,232**

Approved for issue and signed on 7 March 2022

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David Tsaava
General Director

Lia Aslanikashvili
Deputy General Director, Finances

The notes set out on the pages 11-124 form an integral part of these consolidated and separate financial statements.

Consolidated Statement of Changes in Equity for the Year Ended 31 December 2021

In thousands of Georgian Lari	Note	Share capital	Share premium	Share based payments reserve	Revaluation reserve for securities at FVOCI	Revaluation reserve for premises	Retained earnings	Total Equity
Balance at 1 January 2020		**16,057**	**74,923**	**1,822**	**-**	**9,165**	**181,671**	**283,638**
Profit for the year		-	-	-	-	-	24,221	24,221
Other comprehensive income		-	-	-	173	838	-	1,011
Total comprehensive income for 2020		-	-	-	173	838	24,221	25,232
Share Based Payment accruals		-	-	20	-	-	-	20
Balance at 31 December 2020		**16,057**	**74,923**	**1,842**	**173**	**10,003**	**205,892**	**308,890**
Profit for the year		-	-	-	-	-	38,581	38,581
Other comprehensive income		-	-	-	(1,091)	4,423	-	3,332
Total comprehensive income for 2021		-	-	-	(1,091)	4,423	38,581	41,913
Share Based Payment accruals	25	-	-	598	-	-	-	598
Balance at 31 December 2021		**16,057**	**74,923**	**2,440**	**(918)**	**14,426**	**244,477**	**351,405**

Approved for issue and signed on 7 March 2022.

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David Tsaava
General Director

Lia Aslanikashvili
Deputy General Director, Finances

The notes set out on the pages 11-124 form an integral part of these consolidated and separate financial statements

Separate Statement of Changes in Equity for the Year Ended 31 December 2021

In thousands of Georgian Lari	Note	Share capital	Share premium	Share based payments reserve	Revaluation reserve for securities at FVOCI	Revaluation reserve for premises	Retained earnings	Total Equity
Balance at 1 January 2020		**16,057**	**74,923**	**1,822**	**-**	**9,165**	**178,499**	**280,466**
Profit for the year		-	-	-	-	-	22,045	22,045
Other comprehensive income		-	-	-	173	838	-	1,011
Total comprehensive income for 2020		-	-	-	173	838	22,045	23,056
Share Based Payment accruals		-	-	20	-	-	-	20
Transfer of revaluation surplus on premises to retained earnings		-	-	-	-	(838)	838	-
Balance at 31 December 2020		**16,057**	**74,923**	**1,842**	**173**	**9,165**	**201,380**	**303,540**
Profit for the year		-	-	-	-	-	36,123	36,123
Other comprehensive income		-	-	-	(1,091)	4,423	-	3,332
Total comprehensive income for 2021		-	-	-	(1,091)	4,423	36,123	39,455
Share Based Payment accruals	25	-	-	598	-	-	-	598
Balance at 31 December 2021		**16,057**	**74,923**	**2,440**	**(918)**	**13,588**	**237,507**	**343,597**

Approved for issue and signed on 7 March 2022.

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David Tsaava
General Director

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Lia Aslanikashvili
Deputy General Director, Finances

The notes set out on the pages 10-124 form an integral part of these consolidated and separate financial statements.

Consolidated and Separate Statements of Cash Flow for the Year Ended 31 December 2021

In thousands of Georgian Lari	Note	2021 Bank Separate	2021 Consolidated	2020 Bank Separate	2020 Consolidated
Cash flows from operating activities					
Interest income received		134,690	136,394	111,816	113,192
Interest paid		(68,214)	(68,115)	(70,286)	(70,229)
Fees and commissions received		8,663	8,602	7,298	7,256
Fees and commissions paid		(3,893)	(3,893)	(3,165)	(3,165)
Income received from financial derivatives		(2,708)	(2,708)	(1,243)	(1,243)
Income received from trading in foreign currencies		3,386	3,406	4,732	4,719
Other operating income received		1,441	1,505	1,506	1,472
Cash inflow from insurance		-	6,661	-	3,907
Cash outflow from insurance		-	(5,630)	-	(1,486)
Income received from leases		-	1,920	-	1,629
Proceeds from disposal of foreclosed properties		18,193	18,692	3,615	3,615
Staff costs paid		(18,866)	(21,009)	(17,592)	(19,348)
Administrative and other operating expenses paid		(16,149)	(16,990)	(8,294)	(8,911)
Income tax paid		-	(265)	(800)	(1,027)
Cash flows from operating activities before changes in operating assets and liabilities		**56,543**	**58,570**	**27,587**	**30,381**
Net (increase)/decrease in:					
- due from other banks and mandatory cash balances with NBG		7,409	7,934	10,809	4,571
- loans and advances to customers		(214,525)	(214,585)	961	961
- Insurance assets		-	(10,224)	-	1,697
- other financial assets		(56)	(4,028)	148	(1,926)
- other assets		(23,125)	(24,466)	(12,362)	(12,637)
Net increase/(decrease) in:					
- due to other banks		(83,733)	(81,426)	116,647	116,647
- customer accounts		(20,123)	(20,089)	88,263	87,780
- other financial liabilities		(3,258)	(3,171)	3,013	2,991
- insurance liabilities		-	10,672	-	(1,806)
- other liabilities		6,788	6,764	441	552
Net cash from/(used in) operating activities		**(274,080)**	**(274,049)**	**235,507**	**229,211**
Cash flows from investing activities					
Increase of share capital in subsidiary		-	-	(6,262)	-
Proceeds from disposal/redemption of debt securities		137,217	137,217	114,937	114,937
Acquisition of debt securities		(46,805)	(46,805)	(192,780)	(192,780)
Acquisition of premises and equipment		(1,386)	(1,416)	(952)	(989)
Proceeds from disposal of premises and equipment		321	321	9	9
Disposal of investment properties		-	580	358	367
Acquisition of intangible assets		(4,527)	(4,527)	(2,223)	(2,252)
Net cash from/(used in) investing activities		**84,820**	**85,370**	**(86,913)**	**(80,708)**

Consolidated and Separate Statements of Cash Flow for the Year Ended 31 December 2021

		2021		2020	
In thousands of Georgian Lari	Note	Bank Separate	Consoli-dated	Bank Separate	Consoli-dated
Cash flows from financing activities					
Proceeds from other borrowed funds	19	218,271	218,271	253,971	253,972
Repayment of other borrowed funds	19	(236,178)	(236,176)	(267,174)	(267,174)
Repayment of principal of lease liabilities		(1,127)	(1,127)	(1,461)	(1,461)
Net cash from/(used in) financing activities		**(19,034)**	**(19,032)**	**(14,664)**	**(14,663)**
Effect of exchange rate changes on cash and cash equivalents		**(5,585)**	**(5,585)**	**22,549**	**22,549**
Net increase/(decrease) in cash and cash equivalents		**(213,879)**	**(213,296)**	**156,479**	**156,389**
Cash and cash equivalents at the beginning of the year		**403,190**	**405,089**	**246,711**	**248,700**
Cash and cash equivalents at the end of the year	7	**189,311**	**191,793**	**403,190**	**405,089**

During the years ended December 31, 2021 and December 31, 2020 the Group performed the following non-cash transactions. These non-cash transactions were excluded from the consolidated statement of cash flows and presented separately below:

	2021	2020
Loans to customers settled by means of collateral repossession	9,097	7,782
Investment in Subsidiary in a form of PPE	-	1,714

Approved for issue and signed on 7 March 2022.

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David Tsaava
General Director

Lia Aslanikashvili
Deputy General Director, Finances

The notes set out on the pages 11-124 form an integral part of these consolidated and separate financial statements.

1 Introduction

These consolidated and separate financial statements have been prepared in accordance with International Financial Reporting Standards for the year ended 31 December 2021 for JSC BasisBank (the "Bank") and its subsidiaries (Together the "Group").

The Bank was incorporated and is domiciled in Georgia, registered at Krtsanisi Mtatsminda court and registration number is 4/5-44, Tax code 203841833. The Bank is a joint stock company and was set up in accordance with Georgian regulations. As of 31 December 2021 and 2020 the Bank's immediate and ultimate parent company was Xinjiang Hualing Industry & Trade (Group) Co Ltd incorporated in People's Republic of China, and the Bank was ultimately controlled by Mr. Mi Enhua.

	% of ownership interest held as at 31 December	
Shareholders	**2021**	**2020**
Xinjiang Hualing Industry & Trade (Group) Co Ltd	92.305%	92.305%
Mr. Mi Zaiqi	6.969%	6.969%
Other minority shareholders	0.726%	0.726%

Principal activity. The Group's principal business activity is commercial and retail banking operations within Georgia. The Bank has operated under a full banking licence issued by the National Bank of Georgia ("NBG") since 1993. The Bank participates in the state deposit insurance scheme, which was introduced by the Law of Georgia on "Deposits insurance system" dated 17 May 2017. The Deposit Insurance Agency guarantees repayment of 100% of individual deposits up to GEL 15,000 per individual on occurrence of an insurance case - the liquidation, insolvency or bankruptcy process in accordance with the law of Georgia on Commercial Banks. The Group had 535 employees as at 31 December 2021 (2020: 470 employees), of which 491 are the Bank's employees and 44 of the subsidiaries (2020: 433 related to the Bank and 37 to the subsidiaries).

Registered address and place of business. The Bank's registered address is: #1 Ketevan Tsamebuli Avenue, Tbilisi 0103, Georgia.

Presentation currency. These consolidated and separate financial statements are presented in Georgian lari ("GEL"), unless otherwise stated.

Subsidiaries. These consolidated financial statements include the following principal subsidiaries:

			Ownership % at 31 December	
Name	**Country of incorporation**	**Principal activities**	**2021**	**2020**
Basis Asset Management – Holding LLC	Georgia	Asset management	100%	100%
BB Insurance JSC	Georgia	Insurance	100%	100%
BB Leasing JSC	Georgia	Leasing	100%	100%

Basis Asset Management – Holding LLC. The Company was incorporated and is domiciled in Georgia. Registering body is Revenue Service of Georgia, Tax code 404417984. The Company is Limited Liability Company and was set up in accordance with Georgian regulations. The company's principal business activity is holding property for lease. The registered address is: #1 Ketevan Tsamebuli Avenue, Tbilisi 0103, Georgia. The share capital of Basis Asset Management – Holding LLC as at 31 December 2021 was GEL 3.8 million (2020 GEL 3.8 million).

BB Insurance JSC (former Hualing Insurance JSC) was incorporated in December 2017 and is domiciled in Georgia. The Company is a joint stock company limited by shares and was set up in accordance with Georgian regulations. Registering body is Revenue Service of Georgia, Tax code 406232214. The Company's principal business activity is insurance business operations within Georgia. The share capital of BB Insurance as at 31 December 2021 was GEL 6 million (2020: GEL 6 million). The Company has life and non-life licenses issued by the Insurance State Supervision Service of Georgia since 27 December 2017.

The registered address is: #1 Ketevan Tsamebuli Avenue, Tbilisi 0103, Georgia.

BB Leasing JSC (former BHL Leasing JSC) was incorporated and is domiciled in Georgia. Registering body is Revenue Service of Georgia, Tax code 406233534. The Company is Limited Liability Company and was set up in accordance with Georgian regulations. The registered address is: #1 Ketevan Tsamebuli Avenue, Tbilisi 0103, Georgia. The Bank established the leasing subsidiary in December 2018. The share capital BB Leasing as at 31 December 2021 was GEL 11 million (2020: GEL 11 million). The offers the customers financial leasing products in:

- Vehicle leasing
- Leasing of fixed assets (equipment, technic etc.)
- Preferential agricultural leasing (APMA)
- Leasing provided under the program “Produce in Georgia”
- Sale-and-leaseback

Abbreviations. A glossary of various abbreviations used in this document is included in Note 0.

2 Operating Environment of the Group

The Group carries out its operations in Georgia. Consequently, the Group is exposed to the changes in economic and business environment and challenges prevailing on the Georgian financial market, which displays the characteristics of an emerging market. The legal, tax and regulatory frameworks continue development, 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 Georgia. The consolidated and separate financial statements reflect the management’s assessment of the impact of the Georgian business environment on the operations and the financial position of the Group. The future business environment may differ from the management’s assessment.

Georgian banking sector continued to grow in 2020 and 2021, the sector was well prepared to face complications caused by the pandemic. The Banking sector and the business community endured pressure from the tightened operating environment and contracting businesses which resulted in deterioration of assets quality and increased risks in 2020.

The economic lockdowns in 2020 caused significant financial distress to households and businesses, the most negative impact was on tourism, trade, particularly on HORECA sector. To relax the financial stress of temporarily insolvent borrowers, in 2020 the banks granted loan deferral programs to borrowers in most affected sectors and booked extra provisions on portfolios as a preliminary loss recognition on impaired portfolios.

In 2021, upon uplifting of most restrictions on businesses, the economy started to recover at rapid pace. The measures taken by the Government in conjunction with the National Bank of Georgia (NBG) provided necessary support to the business and financial sector. The government introduced a number of programs directed to help the businesses upholding their obligations through tax benefits, loan restructuring programs, subsidizing interest payments, elaborating new financial facilities to support the recovery of the economy; while incentives granted by the NBG to local banks were directed to provide the sector with sufficient coverage and solvency capacity by provisional softening of regulatory requirements on capital and liquidity.

To assess possible impact of COVID-19 pandemic, the Bank performed the analysis of its portfolio under the stress scenarios defined by the national regulator (NBG) soon after beginning of pandemic in 2020 and continued monitoring of affected clients during 2021, until the concessions granted were active. The scenarios were provided for both retail and business portfolios. Portfolio reviewed under the stress conditions included following sectors: Real estate development and Real estate management, Hospitality (Hotels, Restaurants, Cafes & Bars and Tourism service), all clients in top 100 borrowers’ groups, as well as randomly selected borrowers from other sectors in Business and Retail portfolio. In Retail segment the selection included those borrowers who requested modification of their loan schedules during the lockdown period. Based on the stress tests results, clients with potential significant increase of credit risk since origination or potential default trigger events have been identified and have been provisioned according to stage 2 or stage 3 provisioning rules. For details on Stage 2 and Stage 3 provisioning rules please refer to Note 31.

Forward-looking information used in ECL assessment process had been also modified according to the macroeconomic forecasts published by NBG.

As a result of modifications GEL additional ECL provisions have been booked in 2020 either on individual borrower level or incorporated in the macroeconomic scenarios.

By the end of 2021, grace period has ended for more than 80% of the portfolio which were previously granted the grace period in repayments due to COVID impact on borrowers. In particular, grace period has ended for all “Covid” loans in retail segment. Only 3% of this portfolio is in PAR30 overdue as of the end of 2021, which is comparable with the PAR ratios of pre-pandemic levels. Several Clients active in Hotels and Restaurant sectors are still using grace period as of December 2021, with the expected renewal of payments in the summer of 2022. These clients were classified either in stage 2 or Stage 3 based on a case by case analysis conducted by credit experts and risk analysts, taking into consideration outlook for the sector, as well as client specific parameters, i.e. location of the premises, number of rooms available, possible income from other sources.

Overall, after almost 2 years in the pandemic and re-open of most of the businesses, it can be concluded, that the effect of the Covid-19 on the BB’s portfolio was less severe, as assumed at the beginning of the pandemic. Apart from recoveries seen from old problematic clients, reversal of ECL booked in 2020 in anticipation of possible losses due to pandemic has significantly contributed to decrease of ECL as of December 2021, ECL coverage decreased to 1.87% (by ca. 25% compared to December 2020).

Regulatory capital adequacy ratio (“CAR”) decreased after additional provisions booked under NBG standards by 2.8% but subsequently was recovered with the operating income generated during 2020 and 2021. In 2021 most banks including Basisbank recovered CAR to pre-pandemic level and with the consent from NBG restored the capital buffer temporarily released at the outbreak of the pandemic early in 2020.

As at 31 December 2021 the Bank reports a capital adequacy ratio of 17.96%, which is by 2.1% percentage points over the current requirement of 15.87%. The Bank’s financial standing as of capital and liquidity is disclosed in Notes 31 and 32.

3 Significant Accounting Policies

Basis of preparation. These consolidated and separate financial statements (hereafter the “Financial Statements”) have been prepared in accordance with International Financial Reporting Standards (“IFRS”) under the historical cost convention, as modified by the initial recognition of financial instruments at fair value, and by the revaluation of premises, financial instruments categorised at fair value through profit or loss (“FVTPL”) and at fair value through other comprehensive income (“FVOCI”). The principal accounting policies applied in the preparation of these financial statements are set out below. These policies have been consistently applied to all the periods presented, unless otherwise stated. Refer to Note 5.
These consolidated and separate financial statements have been prepared assuming that the Group is a going concern and will continue operation for the foreseeable future.

Consolidated financial statements. Subsidiaries are those investees, including structured entities, that the Group controls because the Group (i) has power to direct relevant activities of the investees that significantly affect their returns, (ii) has exposure, or rights, to variable returns from its involvement with the investees, and (iii) has the ability to use its power over the investees to affect the amount of investor’s returns.

The existence and effect of substantive rights, including substantive potential voting rights, are considered when assessing whether the Group has power over another entity. For a right to be substantive, the holder must have practical ability to exercise that right when decisions about the direction of the relevant activities of the investee need to be made. The Group may have power over an investee even when it holds less than majority of voting power in an investee. In such a case, the Group assesses the size of its voting rights relative to the size and dispersion of holdings of the other vote holders to determine if it has de-facto power over the investee.

Protective rights of other investors, such as those that relate to fundamental changes of investee's activities or apply only in exceptional circumstances, do not prevent the Group from controlling an investee.
Subsidiaries are consolidated from the date on which control is transferred to the Group, and are deconsolidated from the date on which control ceases.

The acquisition method of accounting is used to account for the acquisition of subsidiaries. Identifiable assets acquired and liabilities and contingent liabilities assumed in a business combination are measured at their fair values at the acquisition date, irrespective of the extent of any non-controlling interest.

The Group measures non-controlling interest that represents ownership interest and entitles the holder to a proportionate share of net assets in the event of liquidation on a transaction by transaction basis, either at: (a) fair value, or (b) the non-controlling interest's proportionate share of net assets of the acquiree.

The consideration transferred for the acquiree is measured at the fair value of the assets given up, equity instruments issued and liabilities incurred or assumed, including fair value of assets or liabilities from contingent consideration arrangements, but excludes acquisition related costs such as advisory, legal, valuation and similar professional services. Transaction costs incurred for issuing equity instruments are deducted from equity; transaction costs incurred for issuing debt are deducted from its carrying amount and all other transaction costs associated with the acquisition are expensed.

Intercompany transactions, balances and unrealised gains on transactions between group companies are eliminated; unrealised losses are also eliminated unless the cost cannot be recovered. The Bank and all of its subsidiaries use uniform accounting policies consistent with the Group's policies.

Investments in subsidiaries. Investments in subsidiaries are accounted for under the cost method in the separate financial statements of the Bank. When there is objective evidence that the carrying amount of the investment in subsidiary has impaired the impairment loss is calculated as a difference between the carrying amount of the investment and its recoverable amount. The recoverable amount is determined as the higher of its fair value less costs to sell and its value in use. An impairment loss recognised in prior periods can be reversed only if there has been a change in the estimates used to determine the investment's recoverable amount since the last impairment loss was recognised.

Insurance contracts. Insurance contracts are defined as those containing significant insurance risk at the inception of the contract, or those where at the inception of the contract there is a scenario with commercial substance where the level of insurance risk may be significant. The significance of insurance risk is dependent on both the probability of an insured event and the magnitude of its potential effect. Once a contract has been classified as an insurance contract, it remains an insurance contract for the remainder of its lifetime, even if the insurance risk reduces significantly during this period, unless all rights and obligations are extinguished or expire.

Insurance receivables. Insurance receivables are recognized based upon insurance policy as soon as the terms of the contract enters into force. Insurance receivables are measured at cost. The carrying value of insurance receivables is reviewed for impairment whenever events or circumstances indicate that the carrying amount may not be recoverable, with any impairment loss recorded in the profit or loss.

Financial instruments – key measurement terms.

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

A portfolio of financial derivatives or other financial assets and liabilities that are not traded in an active market is measured at the fair value of a group of financial assets and financial liabilities on the basis of the price that would be received to sell a net long position (i.e. an asset) for a particular risk exposure or paid to transfer a net short position (i.e. a liability) for a particular risk exposure in an orderly transaction between market participants at the measurement date.

This is applicable for assets carried at fair value on a recurring basis if the Group: (a) manages the group of financial assets and financial liabilities on the basis of the Group's net exposure to a particular market risk (or risks) or to the credit risk of a particular counterparty in accordance with the entity's documented risk management or investment strategy; (b) it provides information on that basis about the group of assets and liabilities to the entity's key management personnel; and (c) the market risks, including duration of the Group's exposure to a particular market risk (or risks) arising from the financial assets and financial liabilities is substantially the same.

Valuation techniques such as discounted cash flow models or models based on recent arm's length transactions or consideration of financial data of the investees, are used to measure fair value of certain financial instruments for which external market pricing information is not available. Fair value measurements are analysed by level in the fair value hierarchy as follows: (i) level one are measurements at quoted prices (unadjusted) in active markets for identical assets or liabilities, (ii) level two measurements are valuations techniques with all material inputs observable for the asset or liability, either directly (that is, as prices) or indirectly (that is, derived from prices), and (iii) level three measurements are valuations not based on solely observable market data (that is, the measurement requires significant unobservable inputs). Transfers between levels of the fair value hierarchy are deemed to have occurred at the end of the reporting period. Refer to Note 35.

Transaction costs are incremental costs that are directly attributable to the acquisition, issue or disposal of a financial instrument. An incremental cost is one that would not have been incurred if the transaction had not taken place. Transaction costs include fees and commissions paid to agents (including employees acting as selling agents), advisors, brokers and dealers, levies by regulatory agencies and securities exchanges, and transfer taxes and duties. Transaction costs do not include debt premiums or discounts, financing costs or internal administrative or holding costs.

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

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

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

Financial instruments – initial recognition. Financial instruments at FVTPL are initially recorded at fair value. All other financial instruments are initially recorded at fair value adjusted for transaction costs. Fair value at initial recognition is best evidenced by the transaction price. A gain or loss on initial recognition is only recorded if there is a difference between fair value and transaction price which can be evidenced by other observable current market transactions in the same instrument or by a valuation technique whose inputs include only data from observable markets. After the initial recognition, an ECL allowance is recognised for financial assets measured at AC and investments in debt instruments measured at FVOCI, resulting in an immediate accounting loss.

All purchases and sales of financial assets that require delivery within the time frame established by regulation or market convention ("regular way" purchases and sales) are recorded at trade date, which is the date on which the Group commits to deliver a financial asset. All other purchases are recognised when the entity becomes a party to the contractual provisions of the instrument.

The Group uses discounted cash flow valuation techniques to determine the fair value of foreign exchange forwards that are not traded in an active market. Differences may arise between the fair value at initial recognition, which is considered to be the transaction price, and the amount determined at initial recognition using a valuation technique with level 3 inputs. If any differences remain after calibration of model inputs, such differences are initially recognised within other assets or other liabilities and are subsequently amortised on a straight line basis over the term of the foreign exchange forwards. The differences are immediately recognised in profit or loss if the valuation uses only level 1 or level 2 inputs.

Financial assets – classification and subsequent measurement – measurement categories. The Group classifies financial assets in the following measurement categories: FVTPL, FVOCI and AC. The classification and subsequent measurement of debt financial assets depends on: (i) the Group's business model for managing the related assets portfolio and (ii) the cash flow characteristics of the asset.

Financial assets – classification and subsequent measurement – business model. The business model reflects how the Group manages the assets in order to generate cash flows – whether the Group's objective is: (i) solely to collect the contractual cash flows from the assets ("hold to collect contractual cash flows",) or (ii) to collect both the contractual cash flows and the cash flows arising from the sale of assets ("hold to collect contractual cash flows and sell") or, if neither of (i) and (ii) is applicable, the financial assets are classified as part of "other" business model and measured at FVTPL.

Business model is determined for a group of assets (on a portfolio level) based on all relevant evidence about the activities that the Group undertakes to achieve the objective set out for the portfolio available at the date of the assessment. Factors considered by the Group in determining the business model include the purpose and composition of a portfolio, past experience on how the cash flows for the respective assets were collected, how risks are assessed and managed, how the assets' performance is assessed and how managers are compensated. Refer to Note 4 for critical judgements applied by the Group in determining the business models for its financial assets.

Financial assets – classification and subsequent measurement – cash flow characteristics. Where the business model is to hold assets to collect contractual cash flows or to hold contractual cash flows and sell, the Group assesses whether the cash flows represent solely payments of principal and interest ("SPPI"). Financial assets with embedded derivatives are considered in their entirety when determining whether their cash flows are consistent with the SPPI feature. In making this assessment, the Group considers whether the contractual cash flows are consistent with a basic lending arrangement, i.e. interest includes only consideration for credit risk, time value of money, other basic lending risks and profit margin.

Where the contractual terms introduce exposure to risk or volatility that is inconsistent with a basic lending arrangement, the financial asset is classified and measured at FVTPL. The SPPI assessment is performed on initial recognition of an asset and it is not subsequently reassessed. Refer to Note 4 for critical judgements applied by the Group in performing the SPPI test for its financial assets.

Financial assets – reclassification. Financial instruments are reclassified only when the business model for managing the portfolio as a whole changes. The reclassification has a prospective effect and takes place from the beginning of the first reporting period that follows after the change in the business model. The entity did not change its business model during the current and comparative period and did not make any reclassifications.

Financial assets impairment – credit loss allowance for ECL. The Group assesses, on a forward-looking basis, the ECL for debt instruments measured at AC and FVOCI and for the exposures arising from loan commitments and financial guarantee contracts. The Group measures ECL and recognises credit loss allowance at each reporting date. The measurement of ECL reflects: (i) an unbiased and probability weighted amount that is determined by evaluating a range of possible outcomes, (ii) time value of money and (iii) all reasonable and supportable information that is available without undue cost and effort at the end of each reporting period about past events, current conditions and forecasts of future conditions.

Debt instruments measured at AC are presented in the seprate and consolidated statement of financial position net of the allowance for ECL. For loan commitments and financial guarantees, a separate provision for ECL is recognised as a liability in the consolidated statement of financial position. For debt instruments at FVOCI, changes in amortised cost, net of allowance for ECL, are recognised in profit or loss and other changes in carrying value are recognised in OCI as gains less losses on debt instruments at FVOCI.

The Group applies a three stage model for impairment, based on changes in credit quality since initial recognition. A financial instrument that is not credit-impaired on initial recognition is classified in Stage 1. Financial assets in Stage 1 have their ECL measured at an amount equal to the portion of lifetime ECL that results from default events possible within the next 12 months or until contractual maturity, if shorter (“12 Months ECL”). If the Group identifies a significant increase in credit risk (“SICR”) since initial recognition, the asset is transferred to Stage 2 and its ECL is measured based on ECL on a lifetime basis, that is, up until contractual maturity but considering expected prepayments, if any (“Lifetime ECL”). Refer to Note 31 for a description of how the Group determines when a SICR has occurred. If the Group determines that a financial asset is credit-impaired, the asset is transferred to Stage 3 and its ECL is measured as a Lifetime ECL. The Group’s definition of credit impaired assets and definition of default is explained in Note 31. For financial assets that are purchased or originated credit-impaired (“POCI Assets”), the ECL is always measured as a Lifetime ECL. Note 31 provides information about inputs, assumptions and estimation techniques used in measuring ECL, including an explanation of how the Group incorporates forward-looking information in the ECL models.

As an exception, for certain financial instruments, such as credit cards and overdrafts, that may include both a loan and an undrawn commitment component, the Group applies simplified methodology to measure expected credit losses over the expected lifetime basis. For financial guarantees and credit commitments, provision for ECL is reported as a liability in Provisions for Liabilities and Charges.

Significant increase in credit risk (“SICR”). In order to determine whether there has been a significant increase in credit risk, the Group compares the risk of a default occurring over the life of a financial instrument at the end of the reporting date with the risk of default at the date of initial recognition. The assessment considers relative increase in credit risk rather than achieving a specific level of credit risk at the end of the reporting period. The Group considers all reasonable and supportable forward-looking information available without undue cost and effort, which includes a range of factors, including behavioural aspects of particular customer portfolios. The Group identifies behavioural indicators of increases in credit risk prior to delinquency and incorporated appropriate forward looking information into the credit risk assessment, either at an individual instrument, or on a portfolio level. Refer to Note 31.

Should ECL on all loans and advances to customers be measured at lifetime ECL (that is, including those that are currently in Stage 1 measured at 12-months ECL), the expected credit loss allowance would be higher by GEL 3,433 thousand as of 31 December 2021 (31 December 2020: higher by GEL 2,266 thousand).

Business model assessment. The business model drives classification of financial assets. Management applied judgement in determining the level of aggregation and portfolios of financial instruments when performing the business model assessment. When assessing sales transactions, the Group considers their historical frequency, timing and value, reasons for the sales and expectations about future sales activity. Sales transactions aimed at minimising potential losses due to credit deterioration are considered consistent with the “hold to collect” business model. Other sales before maturity, not related to credit risk management activities, are also consistent with the "hold to collect" business model, provided that they are infrequent or insignificant in value, both individually and in aggregate.

The Group assesses significance of sales transactions by comparing the value of the sales to the value of the portfolio subject to the business model assessment over the average life of the portfolio. In addition, sales of financial asset expected only in stress case scenario, or in response to an isolated event that is beyond the Group's control, is not recurring and could not have been anticipated by the Group, are regarded as incidental to the business model objective and do not impact the classification of the respective financial assets.

The "hold to collect and sell" business model means that assets are held to collect the cash flows, but selling is also integral to achieving the business model's objective, such as, managing liquidity needs, achieving a particular yield, or matching the duration of the financial assets to the duration of the liabilities that fund those assets.

The residual category includes those portfolios of financial assets, which are managed with the objective of realising cash flows primarily through sale, such as where a pattern of trading exists. Collecting contractual cash flow is often incidental for this business model.

Assessment whether cash flows are solely payments of principal and interest ("SPPI"). Determining whether a financial asset's cash flows are solely payments of principal and interest required judgement.

The time value of money element may be modified, for example, if a contractual interest rate is periodically reset but the frequency of that reset does not match the tenor of the debt instrument's underlying base interest rate, for example a loan pays three months interbank rate but the rate is reset every month. The effect of the modified time value of money was assessed by comparing relevant instrument's cash flows against a benchmark debt instrument with SPPI cash flows, in each period and cumulatively over the life of the instrument. The assessment was done for all reasonably possible scenarios, including reasonably possible financial stress situation that can occur in financial markets. The Group applied a threshold of 10% to determine whether differences against a benchmark instruments are significantly different. In case of a scenario with cash flows that significantly differ from the benchmark, the assessed instrument's cash flows are not SPPI and the instrument is then carried at FVTPL.

The Group identified and considered contractual terms that change the timing or amount of contractual cash flows. The SPPI criterion is met if a loan allows early settlement and the prepayment amount substantially represents principal and accrued interest, plus a reasonable additional compensation for the early termination of the contract. The asset's principal is the fair value at initial recognition less subsequent principal repayments, i.e. instalments net of interest determined using the effective interest method. As an exception to this principle, the standard also allows instruments with prepayment features that meet the following condition to meet SPPI: (i) the asset is originated at a premium or discount, (ii) the prepayment amount represents contractual par amount and accrued interest and a reasonable additional compensation for the early termination of the contract, and (ii) the fair value of the prepayment feature is immaterial at initial recognition.

The Groups' loans and finance lease receivables include cross-selling clauses that represent a reduction in the interest rate upon the customer entering into other contracts with the Group or achieving certain criteria, such as maintaining a minimum turnover on current bank accounts held with the Group. The cash flows are SPPI if such clauses merely reduce the Group's overall profit margin on the instrument and there are no other features inconsistent with a basic lending arrangement.

The Group's loan agreements allow adjusting interest rates in response to certain macro-economic or regulatory changes. Management applied judgement and assessed that competition in the banking sector and the practical ability of the borrowers to refinance the loans would prevent it from resetting the interest rates at an above-market level and hence cash flows were assessed as being SPPI.
The instruments that failed the SPPI test are measured at FVTPL.

Financial assets – write-off. Financial assets are written-off, in whole or in part, when the Group exhausted all practical recovery efforts and has concluded that there is no reasonable expectation of recovery. The write-off represents a derecognition event. Indicators that there is no reasonable expectation of recovery include days past due over 180 days and non-existence of collateral as of write off day. The bank will also write off those loans, which were collateralized, but the execution process on overdue liability is finalized and all existing collaterals have been sold on auctions or repossessed. The remaining unsecured liability will be written off, even if there is no overdue portion of the liability at the moment of write off.

Based on expert recommendation, the Group may write-off financial assets that are still subject to enforcement activity when the Group seeks to recover amounts that are contractually due, however, there is no reasonable expectation of recovery, or the expected recovery is insignificant compared to the remaining liability.

Financial assets – derecognition. The Group derecognises financial assets when (a) the assets are redeemed or the rights to cash flows from the assets otherwise expired or (b) the Group has transferred the rights to the cash flows from the financial assets or entered into a qualifying pass-through arrangement while (i) also transferring substantially all risks and rewards of ownership of the assets or (ii) neither transferring nor retaining substantially all risks and rewards of ownership, but not retaining control. Control is retained if the counterparty does not have the practical ability to sell the asset in its entirety to an unrelated third party without needing to impose restrictions on the sale.

Financial assets – modification. The Group sometimes renegotiates or otherwise modifies the contractual terms of the financial assets. The Group assesses whether the modification of contractual cash flows is substantial considering, among other, the following factors: any new contractual terms that substantially affect the risk profile of the asset (e.g. profit share or equity-based return), significant change in interest rate, aggregation of two or more financial assets into one financial asset or any other type of consolidation of financial assets, financial assets with no predetermined cash flows are replaced with schedule or vice-versa, when the rights to cash flows between the original counterparties expire because a new debtor replaces the original debtor (unless both debtors are under common control), change in the currency denomination, new collateral or credit enhancement that significantly affects the credit risk associated with the asset or a significant extension of a loan when the borrower is not in financial difficulties.

When financial assets are contractually modified (e.g. renegotiated), the Group assesses whether the modification is substantial and should result in derecognition of the original asset and recognition of a new asset at fair value. This assessment is based primarily on qualitative factors, described in the relevant accounting policy and it requires significant judgment. In particular, the Group applies judgment in deciding whether credit impaired renegotiated loans should be derecognised and whether the new recognised loans should be considered as credit impaired on initial recognition. The derecognition assessment depends on whether the risks and rewards, that is, the variability of expected (rather than contractual) cash flows, change as a result of such modifications. Management determined that risks and rewards did not change as a result of modifying such loans and therefore in substantially all such modifications, the loans were neither derecognised nor reclassified out of the credit-impaired stage.

When as a result of qualitative analysis, the Bank did not identify any criteria that leads to derecognition, additional quantitative test needs to be performed. Doing so, a modification is generally deemed to be substantial if the net present value of the cash flows under the modified terms, including any fees paid or received, is at least 10 per cent different from the net present value of the remaining cash flows of the financial asset prior to the modification, both discounted at the original effective interest rate of the financial asset prior to the modification.

When the contractual cash flows of a financial asset are renegotiated or otherwise modified and the renegotiation or modification does not result in the derecognition of that financial asset, the Group recalculates the gross carrying amount of the financial asset and recognises a modification gain or loss in profit or loss. The gross carrying amount of the financial asset shall be recalculated as the present value of the renegotiated or modified contractual cash flows that are discounted at the financial asset's original effective interest rate. Any costs or fees incurred adjust the carrying amount of the modified financial asset and are amortised over the remaining term of the modified financial asset.

If the modified terms are substantially different, the rights to cash flows from the original asset expire and the Group derecognises the original financial asset and recognises a new asset at its fair value. The date of renegotiation is considered to be the date of initial recognition for subsequent impairment calculation purposes, including determining whether a SICR has occurred.

Any difference between the carrying amount of the original asset derecognised and fair value of the new substantially modified asset is recognised in profit or loss, unless the substance of the difference is attributed to a capital transaction with owners.

In a situation where the renegotiation was driven by financial difficulties of the counterparty and inability to make the originally agreed payments, the Group compares the original and revised expected cash flows to assess whether the risks and rewards of the asset are substantially different as a result of the contractual modification. If the risks and rewards do not change considerably, the modified asset is not substantially different from the original asset and the modification does not result in derecognition.

The Group recalculates the gross carrying amount by discounting the modified contractual cash flows by the original effective interest rate (or credit-adjusted effective interest rate for POCI financial assets), and recognises a modification gain or loss in profit or loss.

Financial liabilities – measurement categories. Financial liabilities are classified as subsequently measured at AC, except for (i) financial liabilities at FVTPL: this classification is applied to derivatives, financial liabilities held for trading (e.g. short positions in securities), contingent consideration recognised by an acquirer in a business combination and other financial liabilities designated as such at initial recognition and (ii) financial guarantee contracts and loan commitments.

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

An exchange between the Group and its original lenders of debt instruments with substantially different terms, as well as substantial modifications of the terms and conditions of existing financial liabilities, are accounted for as an extinguishment of the original financial liability and the recognition of a new financial liability. The terms are substantially different if the discounted present value of the cash flows under the new terms, including any fees paid net of any fees received and discounted using the original effective interest rate, is at least 10% different from the discounted present value of the remaining cash flows of the original financial liability. In addition, other qualitative factors, such as the currency that the instrument is denominated in, changes in the type of interest rate, new conversion features attached to the instrument and change in loan covenants are also considered.

If an exchange of debt instruments or modification of terms is accounted for as an extinguishment, any costs or fees incurred are recognised as part of the gain or loss on the extinguishment. If the exchange or modification is not accounted for as an extinguishment, any costs or fees incurred adjust the carrying amount of the liability and are amortised over the remaining term of the modified liability.

Modifications of liabilities that do not result in extinguishment are accounted for as a change in estimate using a cumulative catch up method, with any gain or loss recognised in profit or loss, unless the economic substance of the difference in carrying values is attributed to a capital transaction with owners.

Insurance contract liabilities. Insurance contract liabilities include the provision for unearned premiums, provisions for claims and unexpired risk, and payables to reinsurance companies. The provision for unearned premiums is recognized when contracts are entered into and premiums are charged, and is brought to statement of profit and loss as insurance income over the term of the contract. Claims provisions contain provisions for reported claims, provisions for incurred but not reported claims, provisions for costs of processing claims. Provisions for reported claims are determined by individual assessment. Actuarial methods are applied upon determining provisions for the costs of processing claims and for incurred but unreported claims. At each reporting date the carrying amount of unearned premium is calculated on active policies based on the insurance period and time until the expiration date of each insurance policy. The Group reviews its unexpired risk based on the historical performance of separate business lines to determine the overall change

in expected claims. The differences between the unearned premium provision, claims provisions and the expected claims are recognized in the profit or loss by setting up a provision for premium deficiency.
Payables to reinsurance companies are recognised on an accruals basis and measured at amortised cost.

Cash and cash equivalents. Cash and cash equivalents are items which are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value. Cash and cash equivalents include all interbank placements and reverse sale and repurchase agreements with other banks with original maturities of less than three months. Funds restricted for a period of more than three months on origination are excluded from cash and cash equivalents, both in the statement of financial position and for the purposes of the statement of cash flows. Cash and cash equivalents are carried at AC because: (i) they are held for collection of contractual cash flows and those cash flows represent SPPI, and (ii) they are not designated at FVTPL.

The payments or receipts presented in the statement of cash flows represent transfers of cash and cash equivalents by the Group, including amounts charged or credited to current accounts of the Group's counterparties held with the Group, such as loan interest income or principal collected by charging the customer's current account or interest payments or disbursement of loans credited to the customer's current account, which represents cash or cash equivalent from the customer's perspective.

Mandatory cash balances with the NBG. Mandatory cash balances with the NBG are carried at AC and represent non-interest bearing mandatory reserve deposits, which are not available to finance the Group's day to day operations, and hence are not considered as part of cash and cash equivalents for the purposes of the consolidated statement of cash flows.

Due from other banks. Amounts due from other banks are recorded when the Group advances money to counterparty banks. Amounts due from other banks are carried at AC when: (i) they are held for the purposes of collecting contractual cash flows and those cash flows represent SPPI, and (ii) they are not designated at FVTPL.

Investments in debt securities. Based on the business model and the cash flow characteristics, the Group classifies investments in debt securities as carried at AC, FVOCI or FVTPL. Debt securities are carried at AC if they are held for collection of contractual cash flows and where those cash flows represent SPPI, and if they are not voluntarily designated at FVTPL in order to significantly reduce an accounting mismatch.

Debt securities are carried at FVOCI if they are held for collection of contractual cash flows and for selling, where those cash flows represent SPPI, and if they are not designated at FVTPL. Interest income from these assets is calculated using the effective interest method and recognised in profit or loss. An impairment allowance estimated using the expected credit loss model is recognised in profit or loss for the year. All other changes in the carrying value are recognised in OCI. When the debt security is derecognised, the cumulative gain or loss previously recognised in OCI is reclassified from OCI to profit or loss.

Investments in debt securities are carried at FVTPL if they do not meet the criteria for AC or FVOCI. The Group may also irrevocably designate investments in debt securities at FVTPL on initial recognition if applying this option significantly reduces an accounting mismatch between financial assets and liabilities being recognised or measured on different accounting bases.

Investments in equity securities. Financial assets that meet the definition of equity from the issuer's perspective, i.e. instruments that do not contain a contractual obligation to pay cash and that evidence a residual interest in the issuer's net assets, are considered as investments in equity securities by the Group. Investments in equity securities are measured at FVTPL, except where the Group elects at initial recognition to irrevocably designate an equity investments at FVOCI. The Group's policy is to designate equity investments as FVOCI when those investments are held for strategic purposes other than solely to generate investment returns. When the FVOCI election is used, fair value gains and losses are recognised in OCI and are not subsequently reclassified to profit or loss, including on disposal. Impairment losses and their reversals, if any, are not measured separately from other changes in fair value. Dividends continue to be recognised in profit or loss when the Group's right to receive payments is established except when they represent a recovery of an investment rather than a return on such investment.

Loans and advances to customers. Loans and advances to customers are recorded when the Group advances money to purchase or originate a loan due from a customer. Based on the business model and the cash flow characteristics, the Group classifies loans and advances to customers into one of the following measurement categories: (i) AC: loans that are held for collection of contractual cash flows and those cash flows represent SPPI and loans that are not voluntarily designated at FVTPL, and (ii) FVTPL: loans that do not meet the SPPI test or other criteria for AC or FVOCI are measured at FVTPL.

Impairment allowances are determined based on the forward-looking ECL models. Note 31 provides information about inputs, assumptions and estimation techniques used in measuring ECL, including an explanation of how the Group incorporates forward-looking information in the ECL models.

Repossessed collateral. Repossessed collateral represents non-financial assets acquired by the Group in settlement of overdue loans. The assets are initially recognised at fair value when acquired and included in premises and equipment, investment properties or inventories within other assets depending on their nature and the Group's intention in respect of recovery of these assets, and are subsequently remeasured and accounted for in accordance with the accounting policies for these categories of assets. Inventories of repossessed assets are recorded at the lower of cost or net realizable value. The Group applies its accounting policy for non-current assets held for sale or disposal groups to repossessed collateral where the relevant conditions for such classification are met at the end of the reporting period.

Loan commitments. The Group issues commitments to provide loans. These commitments are irrevocable or revocable only in response to a material adverse change. Such commitments are initially recognised at their fair value, which is normally evidenced by the amount of fees received. This amount is amortised on a straight line basis over the life of the commitment, except for commitments to originate loans if it is probable that the Group will enter into a specific lending arrangement and does not expect to sell the resulting loan shortly after origination; such loan commitment fees are deferred and included in the carrying value of the loan on initial recognition. At the end of each reporting period, the commitments are measured at (i) the remaining unamortised balance of the amount at initial recognition, plus (ii) the amount of the loss allowance determined based on the expected credit loss model, unless the commitment is to provide a loan at a below market interest rate, in which case the measurement is at the higher of these two amounts. The carrying amount of the loan commitments represents a liability. For contracts that include both a loan and an undrawn commitment and where the Group cannot separately distinguish the ECL on the undrawn loan component from the loan component, the ECL on the undrawn commitment is recognised together with the loss allowance for the loan. To the extent that the combined ECLs exceed the gross carrying amount of the loan, they are recognised as a liability.

Financial guarantees. Financial guarantees require the Group to make specified payments to reimburse the holder of the guarantee for a loss it incurs because a specified debtor fails to make payment when due in accordance with the original or modified terms of a debt instrument. Financial guarantees are initially recognised at their fair value, which is normally evidenced by the amount of fees received. This amount is amortised on a straight line basis over the life of the guarantee.

At the end of each reporting period, the guarantees are measured at the higher of (i) the amount of the loss allowance for the guaranteed exposure determined based on the expected loss model and (ii) the remaining unamortised balance of the amount at initial recognition. In addition, an ECL loss allowance is recognised for fees receivable that are recognised in the statement of financial position as an asset.

Performance guarantees. Performance guarantees are contracts that provide compensation if another party fails to perform a contractual obligation. Such contracts transfer non-financial performance risk in addition to credit risk. Performance guarantees are initially recognised at their fair value, which is normally evidenced by the amount of fees received. This amount is amortised on a straight line basis over the life of the contract. At the end of each reporting period, the performance guarantee contracts are measured at the higher of (i) the unamortised balance of the amount at initial recognition and (ii) the best estimate of expenditure required to settle the contract at the end of each reporting period, discounted to present value. Where the Group has the contractual right to revert to its customer for recovering amounts paid to settle the performance guarantee contracts, such amounts will be recognised as an asset upon transfer of the loss compensation to the guarantee's beneficiary. These fees are recognised within fee and commission income in profit or loss.

Investment property. Investment property is property held by the Group to earn rental income or for capital appreciation, or both and which is not occupied by the Group. Investment property includes assets under construction for future use as investment property.

Investment properties are stated at cost less accumulated depreciation and provision for impairment, where required. If any indication exists that investment properties may be impaired, the Group estimates the recoverable amount as the higher of value in use and fair value less costs to sell.
The carrying amount of an investment property is written down to its recoverable amount through a charge to profit or loss for the year. An impairment loss recognised in prior years is reversed if there has been a subsequent change in the estimates used to determine the asset's recoverable amount.

Earned rental income is recorded in profit or loss for the year within other operating income.

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

Premises are subject to revaluation with sufficient regularity to ensure that the carrying amount does not differ materially from that which would be determined using fair value at the end of the reporting period. Increases in the carrying amount arising on revaluation are credited to other comprehensive income and increase the revaluation surplus in equity. Decreases that offset previous increases of the same asset are recognised in other comprehensive income and decrease the previously recognised revaluation surplus in equity; all other decreases are charged to profit or loss for the year. The revaluation reserve for premises included in equity is transferred directly to retained earnings when the revaluation surplus is realised on the retirement or disposal of the asset.

If there is no market based evidence of fair value, fair value is estimated using an income approach.

The Group's land and buildings were appraised by an independent appraiser Veritas Brown Caucasus LLC (trading as Cushman & Wakefield) in 2021 using market based approach. The valuation results were reflected in theese consolidated and standalone financial statements.

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

At the end of each reporting period management assesses whether there is any indication of impairment of premises and equipment. If any such indication exists, management estimates the recoverable amount, which is determined as the higher of an asset's fair value less costs to sell and its value in use. The carrying amount is reduced to the recoverable amount and the impairment loss is recognised in profit or loss for the year to the extent it exceeds the previous revaluation surplus in equity.

An impairment loss recognised for an asset in prior years is reversed if there has been a change in the estimates used to determine the asset's value in use or fair value less costs to sell.

Gains and losses on disposals determined by comparing proceeds with carrying amount are recognised in profit or loss for the year (within other operating income, net).

Depreciation. Land and construction in progress are not depreciated. Depreciation of other items of premises and equipment and right-of-use assets is calculated using the straight-line method to allocate their cost or revalued amounts to their residual values over their estimated useful lives:

	Useful lives in years
Premises	50
Office and computer equipment	5
ATM	10
Leasehold improvements	1 to 5
Motor vehicles	5
Right-of-use assets	1 to 10

The residual value of an asset is the estimated amount that the Group would currently obtain from disposal of the asset less the estimated costs of disposal, if the asset were already of the age and in the condition expected at the end of its useful life. The assets' residual values and useful lives are reviewed, and adjusted if appropriate, at the end of each reporting period.

Intangible assets. The Group's intangible assets have definite useful life and primarily include capitalised computer software and licences. Acquired computer software licences are capitalised on the basis of the costs incurred to acquire and bring to use the specific software. Development costs that are directly associated with identifiable and unique software controlled by the Group are recorded as intangible assets if the inflow of incremental economic benefits exceed costs incured.

Capitalised costs include costs for the software development service provided by external contractors and payrolls to employees involved in the development. All other costs associated with computer software, e.g. its maintenance, are expensed when incurred. Capitalised computer software without functional maturity is amortised on a straight line basis over expected useful lives of 10 years. Licenses without functional maturity is amortised on a straight line basis over expected useful lives of 8 years.

Accounting for leases. The Group leases office and premises. Leases are recognised as a right-of-use asset and a corresponding liability at the date at which the leased asset is available for use by the Group. Each lease payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the lease period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.

The right-of-use asset is recognised at cost and depreciated over the shorter of the asset's useful life and the lease term on a straight-line basis.
Liabilities arising from a lease are initially measured on a present value basis. Lease liabilities include the net present value of the following lease payments:

- fixed payments (including in-substance fixed payments), less any lease incentives receivable;
- variable lease payment that are based on an index or a rate;
- amounts expected to be payable by the lessee under residual value guarantees;
- the exercise price of a purchase option if the lessee is reasonably certain to exercise that option, and
- payments of penalties for terminating the lease, if the lease term reflects the lessee exercising that option.

The lease payments are discounted using the interest rate implicit in the lease. If that rate cannot be determined, the lessee's incremental borrowing rate is used, being the rate that the lessee would have to pay to borrow the funds necessary to obtain an asset of similar value in a similar economic environment with similar terms and conditions.

Right-of-use assets are measured at cost comprising the following:

- the amount of the initial measurement of lease liability;
- any lease payments made at or before the commencement date less any lease incentives received;
- any initial direct costs, and
- restoration costs.

As an exception to the above, the Group accounts for short-term leases and leases of low value assets of GEL 13 thousand and less by recognising the lease payments as an operating expense on a straight line basis.

In determining the lease term, management of the Group considers all facts and circumstances that create an economic incentive to exercise an extension option, or not exercise a termination option. Extension options (or periods after termination options) are only included in the lease term if the lease is reasonably certain to be extended (or not terminated).

The assessment is reviewed if a significant event or a significant change in circumstances occurs which affects this assessment and that is within the control of the lessee.

Accounting for operating leases by the Group as a lessor. When assets are leased out under an operating lease, the lease payments receivable are recognised as rental income on a straight-line basis over the lease term.

Finance lease receivables. Where the Group is a lessor in a lease which transfers substantially all the risks and rewards incidental to ownership to the lessee, the assets leased out are presented as a finance lease receivable and carried at the present value of the future lease payments. Finance lease receivables are initially recognised at commencement (when the lease term begins) using a discount rate determined at inception (the earlier of the date of the lease agreement and the date of commitment by the parties to the principal provisions of the lease).

The difference between the gross receivable and the present value represents unearned finance income. This income is recognised over the term of the lease using the net investment method (before tax), which reflects a constant periodic rate of return. Incremental costs directly attributable to negotiating and arranging the lease are included in the initial measurement of the finance lease receivable and reduce the amount of income recognised over the lease term. Finance income from lease is recorded as a separate line in profit or loss and other comprehensive income statement.

Credit loss allowance is recognised in accordance with the general ECL model using a simplified approach at lifetime ECL. The ECL is determined in the same way as for loans and advances measured at AC and recognised through an allowance account to write down the receivables' net carrying amount to the present value of expected cash flows discounted at the interest rates implicit in the finance leases.

The estimated future cash flows reflect the cash flows that may result from obtaining and selling the assets subject to the lease.

Non-current assets and disposal groups classified as held for sale. Non-current assets and disposal groups, which may include both non-current and current assets, are classified in the statement of financial position as 'non-current assets held for sale' if their carrying amount will be recovered principally through a sale transaction, including loss of control of a subsidiary holding the assets, within twelve months after the end of the reporting period.

Assets are reclassified when all of the following conditions are met: (a) the assets are available for immediate sale in their present condition; (b) the Group's management approved and initiated an active programme to locate a buyer; (c) the assets are actively marketed for sale at a reasonable price; (d) the sale is expected within one year and (e) it is unlikely that significant changes to the plan to sell will be made or that the plan will be withdrawn. Non-current assets or disposal groups classified as held for sale in the current period's statement of financial position are not reclassified or re-presented in the comparative statement of financial position to reflect the classification at the end of the current period.

Held for sale are measured at the lower of their carrying amount and fair value less costs to sell.

Due to other banks. Amounts due to other banks are recorded when money or other assets are advanced to the Group by counterparty banks for a short period of time. The non-derivative liability is carried at AC. If the Group purchases its own debt, the liability is removed from the consolidated statement of financial position and the difference between the carrying amount of the liability and the consideration paid is included in gains or losses arising from early retirement of debt.

Customer accounts. Customer accounts are non-derivative liabilities to individuals, state or corporate customers and are carried at AC.

Borrowed funds. Borrowed funds include lending from international and local financial institutions that are carried at AC.

Subordinated debt. Subordinated debt can only be paid in the event of a liquidation after the claims of other higher priority creditors have been met. Subordinated debt is carried at AC.

Derivative financial instruments. Derivative financial instruments, including foreign exchange contracts, currency and interest rate swaps, are carried at their fair value.

The Group also enters into offsetting loans with its counterparty banks to exchange currencies. Such loans, while legally separate, are aggregated and accounted for as a single derivative financial instrument (currency swap) on a net basis where (i) the loans are entered into at the same time and in contemplation of one another, (ii) they have the same counterparty, (iii) they relate to the same risk and (iv) there is no apparent business purpose for structuring the transactions separately that could not also have been accomplished in a single transaction.

All derivative instruments are carried as assets when fair value is positive, and as liabilities when fair value is negative. Changes in the fair value of derivative instruments are included in profit or loss for the year (gains less losses on derivatives). The Group does not apply hedge accounting.

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

Current tax is the amount expected to be paid to, or recovered from, the taxation authorities in respect of taxable profits or losses for the current and prior periods.

Taxable profits or losses are based on estimates if the financial statements are authorised prior to filing relevant tax returns. Taxes other than on income are recorded within administrative and other operating expenses.

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

Tax deduction for lease payments is allocated to depreciation of right of use asset and interest cost on the lease liability. As a result, no temporary differences arise upon initial recognition of a new lease where the Group is a lessee.

Deferred tax assets for deductible temporary differences and tax loss carry forwards are recorded only to the extent that it is probable that future taxable profit will be available against which the deductions can be utilised.

Deferred income tax is not recognised on post-acquisition retained earnings and other post acquisition movements in reserves of subsidiaries where the Group controls the subsidiary’s dividend policy, and it is probable that the difference will not reverse through dividends or otherwise in the foreseeable future.

Provisions for liabilities and charges. Provisions for liabilities and charges are non-financial liabilities of uncertain timing or amount. They are accrued when the Group has a present legal or constructive obligation as a result of past events, 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.

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

Dividends. Dividends are recorded in equity in the period in which they are declared. The statutory accounting reports of the Bank are the basis for profit distribution and other appropriations.

Interest income and expense recognition. Interest income and expense are recorded for all debt instruments, other than those at FVTPL, on an accrual basis using the effective interest method. This method defers, as part of interest income or expense, all fees paid or received between the parties to the contract that are an integral part of the effective interest rate, transaction costs and all other premiums or discounts.

Fees integral to the effective interest rate include origination fees received or paid by the entity relating to the creation or acquisition of a financial asset or issuance of a financial liability, for example fees for evaluating creditworthiness, evaluating and recording guarantees or collateral, negotiating the terms of the instrument and for processing transaction documents. Commitment fees received by the Group to originate loans at market interest rates are integral to the effective interest rate if it is probable that the Group will enter into a specific lending arrangement and does not expect to sell the resulting loan shortly after origination. The Group does not designate loan commitments as financial liabilities at FVTPL.

For financial assets that are originated or purchased credit-impaired, the effective interest rate is the rate that discounts the expected cash flows (including the initial expected credit losses) to the fair value on initial recognition (normally represented by the purchase price). As a result, the effective interest is credit-adjusted. Interest income is calculated by applying the effective interest rate to the gross carrying amount of financial assets, except for (i) financial assets that have become credit impaired (Stage 3), for which interest revenue is calculated by applying the effective interest rate to their AC, net of the ECL provision, and (ii) financial assets that are purchased or originated credit impaired, for which the original credit-adjusted effective interest rate is applied to the AC.

Fee and commission income. Fee and commission income is recognised over time on a straight line basis as the services are rendered, when the customer simultaneously receives and consumes the benefits provided by the Group's performance. Such income includes recurring fees for account maintenance, account servicing fees, etc. Variable fees are recognised only to the extent that management determines that it is highly probable that a significant reversal will not occur.

Other fee and commission income is recognised at a point in time when the Group satisfies its performance obligation, usually upon execution of the underlying transaction. The amount of fee or commission received or receivable represents the transaction price for the services identified as distinct performance obligations. Such income includes fees for arranging a sale or purchase of foreign currencies on behalf of a customer, fees for processing payment transactions, fees for cash settlements, collection or cash disbursements, as well as, commissions and fees arising from negotiating, or participating in the negotiation of a transaction for a third party, such as the acquisition of loans, shares or other securities or the purchase or sale of businesses.

Loan syndication fees are recognised as income when the syndication has been completed and the Group retains no part of the loan package for itself, or retains a part at the same effective interest rate as for the other participants.

Net insurance revenues. Net Insurance premiums written are recognized on policy inception and earned on a pro rata basis over the term of the related policy coverage. Premiums written reflect business commenced during the period, and exclude any sales-based taxes or duties.

Provision for unearned premiums. The proportion of written premiums attributable to subsequent periods is deferred as unearned premium. The change in the provision for unearned premium is taken to the profit or loss in the order that revenue is recognized over the period of risk or, for annuities, the amount of expected future benefit payments.

Incurred but not reported (IBNR) claims. The assumptions used in the estimation of insurance assets and liabilities are intended to result in reserves which are sufficient to cover any liabilities arising out of insurance contracts so far as can reasonably be foreseen. Reserve is made at the statement of financial position date for the expected ultimate cost of settlement of all claims notified in respect of events up to that date, whether reported or not, less amounts already paid. The Group makes estimate of the ultimate liability arising from claims under life insurance contracts that are incurred but not yet reported at the reporting date. The ultimate cost of IBNR is calculated by using actuarial method for life insurance. The primary underlying assumption of the method are mortality rates in Georgia, maximum delay period for reporting of claims and monthly probability of claim identification.

Net insurance claims. Insurance claims incurred include all claim losses occurring during the period, whether reported or not, including the related handling costs and other recoveries and any adjustments to claims outstanding from previous periods. Claims handling costs include internal and external costs incurred in connection with the negotiation and settlement of claims, such as salaries of general practitioners. Internal costs include all direct expenses of the claims department and any part of the general administrative costs directly attributable to the claims function.

Sales and purchases of foreign currencies and currency conversion. The Group sells and purchases foreign currencies in the cash offices and through the bank accounts, as well as exchanges foreign currencies. The transactions are performed at the exchange rates established by the Group, which are different from the official spot exchange rates at the particular dates. The differences between the official rates and Group rates are recognised as gains less losses from trading in foreign currencies at a point in time when a particular performance obligation is satisfied.

Foreign currency translation. The functional currency of each of the Group's consolidated entities is the currency of the primary economic environment in which the entity operates. The functional currency of the Bank and its subsidiaries, and the Group's presentation currency, is the national currency of Georgia, Georgian Lari ("GEL").

Monetary assets and liabilities are translated into each the Group's functional currency at the official exchange rate of the NBG at the end of the respective reporting period. Foreign exchange gains and losses resulting from the settlement of transactions and from the translation of monetary assets and liabilities into the Group's each functional currency at year-end official exchange rates of the NBG, are recognised in profit or loss for the year (as foreign exchange translation gains less losses).

Translation at year-end rates does not apply to non-monetary items that are measured at historical cost. Non-monetary items measured at fair value in a foreign currency, including equity investments, are translated using the exchange rates at the date when the fair value was determined.

Effects of exchange rate changes on non-monetary items measured at fair value in a foreign currency are recorded as part of the fair value gain or loss.

Loans between group entities and related foreign exchange gains or losses are eliminated upon consolidation. At 31 December, the principal rate of exchange used for translating foreign currency balances were:

	December 31, 2021	December 31, 2020
USD 1 = GEL	3.0976	3.2766
EUR 1 = GEL	3.5040	4.0233

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

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

Share based payments. Under share-based compensation plan the Group receives services from management as consideration for equity instruments of the Group. The fair value of the employee services received in exchange for the grant of the equity instruments is recognised as an expense. The total amount to be expensed is determined by reference to the fair value of the equity instruments granted, excluding the impact of any non-market service and performance vesting conditions. Non-market vesting conditions are included in assumptions about the number of equity instruments that are expected to vest. The total amount expensed is recognised over the vesting period, which is the period over which all of the specified vesting conditions are to be satisfied. At each balance sheet date, the Group revises its estimates of the number of equity instruments that are expected to vest based on the non-marketing vesting conditions. It recognises the impact of the revision of original estimates, if any, in profit or loss, with a corresponding adjustment to equity. Increase in equity on accrued shares resulting from the equity settled schemes is accounted for under share based payment reserve. Upon meeting vesting conditions, share based payment reserve attributable to the vested shares is transferred to share capital and share premium.

Fair value of derivatives and certain other instruments. Information about fair values of instruments that were valued using assumptions that are not based on observable market data is disclosed in Note 35.

Initial recognition of related party transactions. In the normal course of business the Group enters into transactions with its related parties. IFRS 9 requires initial recognition of financial instruments based on their fair values.

Judgement is applied in determining if transactions are priced at market or non-market interest rates, where there is no active market for such transactions.

The basis for judgement is pricing for similar types of transactions with unrelated parties and effective interest rate analysis. Terms and conditions of related party balances are disclosed in Note 36.

Accounting for subordinated loans from Shareholder. The shareholder ("Xinjiang Hualing Industry & Trade (Group) Co Ltd') provided subordinated loans to the group of USD 4,900 thousand, bearing a fixed interest rate of 7% per annum payable annually until maturity on 2026.

The loan was originally recognised and is subsequently carried on the statement of financial position at amortised contractual value. Terms and conditions of related party balances are disclosed in note 36.

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies

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

ECL measurement and incorporation of forward-looking information in ECL models. Measurement of ECLs is a significant estimate that involves determination of methodology, models and data inputs. Details of ECL measurement methodology are disclosed in Note 31. The following components have a major impact on credit loss allowance: definition of default, SICR, probability of default ("PD"), exposure at default ("EAD"), and loss given default ("LGD"), as well as models of macro-economic scenarios. It is worth noting that macro-economic parameters are very volatile, thus their impact on ECL might change significantly depending on the given situation and specific macroeconomic forecasts. The group incorporates forward-looking macroeconomic information two most critical components for ECL estimation: PD and LGD. Note 31 provides information about inputs, assumptions and estimation techniques used in PD and LGD models for ECL estimation, including an explanation of how the Group incorporates forward-looking information in the ECL models.

The assessment of SICR and the calculation of ECLs both incorporate supportable forward-looking information. Forecasts of economic variables (the "base economic scenario", "Upside economic scenario" and "downside economic scenario") are published by the National Bank of Georgia and provide the best estimate of the expected macro-economic development. The Group identified certain key economic variables that correlate with developments in credit risk and ECLs. The impact of the relevant economic variables on the PD has been determined by performing statistical regression analysis to understand the impact that the changes in these variables historically had on the default rates. Final PD models have been adjusted with relevant macroeconomic variables, with significant impact on Default rates GDP Growth for Retail PD Models and Unemployment for Corporate PD Models).

The Group has incorporated macroeconomic variables in the formulas for LGD, in particular in LGD2 formulas, via incorporating adjustment by real estate price index on the collateral value. Macroeconomic adjustments were significant in 2020, in 2021 no adjustment is done for EAD, as the impact has been assessed as insignificant.

Currently the Group uses only scenarios published by the National Bank of Georgia for macroeconomic adjustment in impairment model. In the final model, Scenario weights are according to the weights determined in the NBG's publication: 50% for baseline scenario, 25%-25% for upside and downside scenarios.
As with any economic forecast, the projections and likelihoods of occurrence are subject to a high degree of inherent uncertainty, and therefore the actual outcomes may be significantly different to those projected.

The most significant forward looking assumptions that correlate with ECL level and their assigned weights were as follows at 31 December 2021:

Variable	Scenario	Assigned weight	Assumption for: 2022	2023	2024
CPI Inflation %	Base	50%	7.00%	2.50%	3.00%
	Upside	25%	5.50%	3.00%	3.00%
	Downside	25%	8.00%	4.00%	3.00%
Real GDP Growth rate %	Base	50%	5.00%	4.00%	4.50%
	Upside	25%	5.00%	5.00%	4.50%
	Downside	25%	2.00%	4.00%	5.00%
Nominal Effective Exchange Rate NEER (1995=100)	Base	50%	252.50	252.50	252.50
	Upside	25%	258.80	262.70	266.60
	Downside	25%	237.40	240.90	245.70
Real Estate price index in GEL (YoY	Base	50%	107.00	105.00	105.00
	Upside	25%	106.00	105.00	105.50
	Downside	25%	109.00	101.00	103.00
GEL/USD Nominal Exchange Rate (YoY)	Base	50%	100.00	100.00	100.00
	Upside	25%	96.00	98.00	98.00
	Downside	25%	110.00	98.00	97.00
Unemployment (%)	Base	50%	20.02	19.02	18.52
	Upside	25%	19.52	18.02	18.02
	Downside	25%	22.52	23.52	21.52

The assumptions and assigned weights were as follows at 31 December 2020:

Variable	Scenario	Assigned weight	Assumption for: 2021	2022	2023
CPI Inflation %	Base	50%	3.00%	3.00%	3.00%
	Upside	25%	4.00%	3.00%	3.00%
	Downside	25%	6.00%	2.50%	2.50%
Real GDP Growth rate %	Base	50%	5.00%	4.50%	4.50%
	Upside	25%	6.00%	5.00%	5.00%
	Downside	25%	1.00%	4.00%	4.00%
Nominal Effective Exchange Rate NEER (1995=100)	Base	50%	252.00	252.00	252.00
	Upside	25%	259.60	267.30	267.30
	Downside	25%	222.40	229.10	229.10
Real Estate price index in GEL (YoY	Base	50%	100.00	103.00	103.00
	Upside	25%	103.00	103.00	103.00
	Downside	25%	100.00	105.00	105.00
GEL/USD Nominal Exchange Rate (YoY)	Base	50%	100.00	100.00	100.00
	Upside	25%	95.00	95.00	95.00
	Downside	25%	110.00	95.00	95.00
Country Sovereign risk premium %	Base	50%	2.75	2.75	2.75
	Upside	25%	2.70	2.70	2.70
	Downside	25%	2.90	2.85	2.85

Change in the assigned weights to specific macroeconomic scenarios proves to be rather limited in the given composition of portfolio, in particular a change in the weight assigned to base forward looking macro-economic set of assumptions by 10% towards the immediate downside level assumptions would result in an increase in ECL by GEL 45 thousand at 31 December 2021 (31 December 2020: by GEL 104 thousand). A corresponding change towards the upside assumptions would result in a decrease in ECL by GEL 7 thousand at 31 December 2021 (31 December 2020: by GEL 61 thousand).

A 10% increase in PD estimates would result in an increase in total expected credit loss allowances of GEL 384 thousand at 31 December 2021 (31 December 2020: GEL 80 thousand). A 10% decrease in PD estimates would result in an decrease in total expected credit loss allowances of GEL 371 thousand at 31 December 2021 (31 December 2020: GEL 79 thousand).

A 10% increase in LGD estimates would result in an increase in total expected credit loss allowances of GEL 629 thousand at 31 December 2021 (31 December 2020: GEL 740 thousand). A 10% decrease in LGD estimates would result in a decrease in total expected credit loss allowances of GEL 621 thousand at 31 December 2021 (31 December 2020: GEL 740 thousand).

The Bank applies LGD floor to estimated LGD value. A 10% increase or decrease in LGD floor value would result in an increase or decrease in total expected credit loss allowances of GEL 185 thousand at 31 December 2021 (31 December 2020: increase or decrease by GEL 137 thousand).

Premises valuation. Premises are stated revalued amounts and are subject to revaluation with sufficient regularity to ensure that the carrying amount does not differ materially from that which would be determined using fair value at the end of the reporting period. Premises have been revalued at fair value in December 2021 by an independent firm of valuers. The fair value of premises were estimated based on comparable sales approach.

Repossessed assets valuation. All repossessed assets is measured at the lower of cost or net realisable value. The Group performs regular internal valuations to make sure that the carrying amount is not higher than the net realisable value. Valuations are based on available information on market prices, for repossessed real estate on market prices per squatter meter.

Insurance contract liabilities. Major assumptions refer to uncertainty regarding insurance contract liabilities. For insurance contract provisions estimates have to be mostly for unearned premium and claims ("UPR") and for the expected ultimate cost of claims incurred but not yet reported at the reporting date ("IBNR"). The Group makes estimates of UPR and IBNR claims reserves on an undiscounted basis. It can take a significant period of time before the ultimate claims cost can be established with certainty and for some type of policies, UPR reserve form a significant part of the insurance contract liabilities.

5 Adoption of New or Revised Standards and Interpretations

In the current year, the Bank has applied the below amendments to IFRS Standards and Interpretations issued by the Board that are effective for an annual period that begins on or after January 1, 2021. Their adoption has not had any material impact on the disclosures or on the amounts reported in these financial statements.

Interest Rate Benchmark Reform amendments to IFRS 9 and IFRS 7	*In September 2019, the IASB issued Interest Rate Benchmark Reform (Amendments to IFRS 9, IAS 39 and IFRS 7). These amendments modify specific hedge accounting requirements to allow hedge accounting to continue for affected hedges during the period of uncertainty before the hedged items or hedging instruments affected by the current interest rate benchmarks are amended as a result of the on-going interest rate benchmark reforms.* *The amendments are not relevant to the Bank given that it does not apply hedge accounting to its benchmark interest rate exposures. Respectively, the application of the amendments does not impact the Bank's accounting for the year ended December 31, 2021.* *The amendments also introduce new disclosure requirements to IFRS 7 for hedging relationships that are subject to the exceptions introduced by the amendments to IFRS 9.*
Amendments to IFRS 16 – Covid-19-Related Rent Concessions	*In the prior year, the Group early adopted Covid-19-Related Rent Concessions (Amendment to IFRS 16) that provided practical relief to lessees in accounting for rent concessions occurring as a direct consequence of COVID-19, by introducing a practical expedient to IFRS 16. This practical expedient was available to rent concessions for which any reduction in lease payments affected payments originally due on or before 30 June 2021.* *The practical expedient permits a lessee to elect not to assess whether a COVID-19-related rent concession is a lease modification. A lessee that makes this election shall account for any change in lease payments resulting from the COVID-19-related rent concession applying IFRS 16 as if the change were not a lease modification.* *The practical expedient applies only to rent concessions occurring as a direct consequence of COVID-19 and only if certain criteria are met.* *The effect of the adoption of the amendment was not significant to the consolidated and separate financial statements of 2020 and 2021.*

6 New Accounting Pronouncements

At the date of authorisation of these financial statements, the Group and the Bank have not applied the following new and revised IFRS Standards that have been issued but are not yet effective:

IFRS 17 (including the June 2020 Amendments to IFRS 17)	*Insurance Contracts*
Amendments to IFRS 10 and IAS 28	*Sale or Contribution of Assets between an Investor and its Associate or Joint Venture*
Amendments to IAS 1	*Classification of Liabilities as Current or Non-current*
Amendments to IFRS 3	*Reference to the Conceptual Framework*
Amendments to IAS 16	*Property, Plant and Equipment—Proceeds before Intended Use*
Amendments to IAS 37	*Onerous Contracts—Cost of Fulfilling a Contract*
Annual Improvements to IFRS Standards 2018-2020 Cycle	*Amendments to IFRS 1 First-time Adoption of International Financial Reporting Standards, IFRS 9 Financial Instruments, IFRS 16 Leases, and IAS 41 Agriculture*
Amendments to IAS 1 and IFRS Practice Statement 2	*Disclosure of Accounting Policies*
Amendments to IAS 8	*Definition of Accounting Estimates*
Amendments to IAS 12	*Deferred Tax related to Assets and Liabilities arising from a Single Transaction*

Management does not expect that the adoption of the Standards listed above will have a material impact on the financial statements of the Group and the Bank in future periods, except as noted below:

IFRS 17 Insurance Contracts

IFRS 17 establishes the principles for the recognition, measurement, presentation and disclosure of insurance contracts and supersedes IFRS 4 *Insurance Contracts*.

IFRS 17 outlines a general model, which is modified for insurance contracts with direct participation features, described as the variable fee approach. The general model is simplified if certain criteria are met by measuring the liability for remaining coverage using the premium allocation approach.

The general model uses current assumptions to estimate the amount, timing and uncertainty of future cash flows and it explicitly measures the cost of that uncertainty. It takes into account market interest rates and the impact of policyholders' options and guarantees.

In June 2020, the Board issued *Amendments to IFRS 17* to address concerns and implementation challenges that were identified after IFRS 17 was published. The amendments defer the date of initial application of IFRS 17 (incorporating the amendments) to annual reporting periods beginning on or after 1 January 2023. At the same time, the Board issued *Extension of the Temporary Exemption from Applying IFRS 9 (Amendments to IFRS 4)* that extends the fixed expiry date of the temporary exemption from applying IFRS 9 in IFRS 4 to annual reporting periods beginning on or after 1 January 2023.

IFRS 17 must be applied retrospectively unless impracticable, in which case the modified retrospective approach or the fair value approach is applied.

For the purpose of the transition requirements, the date of initial application is the start of the annual reporting period in which the entity first applies the Standard, and the transition date is the beginning of the period immediately preceding the date of initial application.

Amendments to IFRS 10 Consolidated Financial Statements and IAS 28 Investments in Associates and Joint Ventures—Sale or Contribution of Assets between an Investor and its Associate or Joint Venture

The amendments to IFRS 10 and IAS 28 deal with situations where there is a sale or contribution of assets between an investor and its associate or joint venture. Specifically, the amendments state that gains or losses resulting from the loss of control of a subsidiary that does not contain a business in a transaction with an associate or a joint venture that is accounted for using the equity method, are recognised in the parent's profit or loss only to the extent of the unrelated investors' interests in that associate or joint venture. Similarly, gains and losses resulting from the remeasurement of investments retained in any former subsidiary (that has become an associate or a joint venture that is accounted for using the equity method) to fair value are recognised in the former parent's profit or loss only to the extent of the unrelated investors' interests in the new associate or joint venture.

The effective date of the amendments has yet to be set by the Board; however, earlier application of the amendments is permitted. The directors of the Company anticipate that the application of these amendments may have an impact on the Group's consolidated financial statements in future periods should such transactions arise.

Amendments to IAS 1 Presentation of Financial Statements—Classification of Liabilities as Current or Non-current

The amendments to IAS 1 affect only the presentation of liabilities as current or non-current in the statement of financial position and not the amount or timing of recognition of any asset, liability, income or expenses, or the information disclosed about those items.

The amendments clarify that the classification of liabilities as current or non-current is based on rights that are in existence at the end of the reporting period, specify that classification is unaffected by expectations about whether an entity will exercise its right to defer settlement of a liability, explain that rights are in existence if covenants are complied with at the end of the reporting period, and introduce a definition of 'settlement' to make clear that settlement refers to the transfer to the counterparty of cash, equity instruments, other assets or services.

The amendments are applied retrospectively for annual periods beginning on or after 1 January 2023, with early application permitted.

Amendments to IFRS 3 Business Combinations—Reference to the Conceptual Framework

The amendments update IFRS 3 so that it refers to the 2018 *Conceptual Framework* instead of the 1989 *Framework*. They also add to IFRS 3 a requirement that, for obligations within the scope of IAS 37, an acquirer applies IAS 37 to determine whether at the acquisition date a present obligation exists as a result of past events. For a levy that would be within the scope of IFRIC 21 *Levies*, the acquirer applies IFRIC 21 to determine whether the obligating event that gives rise to a liability to pay the levy has occurred by the acquisition date.

Finally, the amendments add an explicit statement that an acquirer does not recognise contingent assets acquired in a business combination.

The amendments are effective for business combinations for which the date of acquisition is on or after the beginning of the first annual period beginning on or after 1 January 2022. Early application is permitted if an entity also applies all other updated references (published together with the updated Conceptual Framework) at the same time or earlier.

Amendments to IAS 16 Property, Plant and Equipment—Proceeds before Intended Use

The amendments prohibit deducting from the cost of an item of property, plant and equipment any proceeds from selling items produced before that asset is available for use, i.e. proceeds while bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management. Consequently, an entity recognises such sales proceeds and related costs in profit or loss. The entity measures the cost of those items in accordance with IAS 2 *Inventories*.

The amendments also clarify the meaning of 'testing whether an asset is functioning properly'. IAS 16 now specifies this as assessing whether the technical and physical performance of the asset is such that it is capable of being used in the production or supply of goods or services, for rental to others, or for administrative purposes.

If not presented separately in the statement of comprehensive income, the financial statements shall disclose the amounts of proceeds and cost included in profit or loss that relate to items produced that are not an output of the entity's ordinary activities, and which line item(s) in the statement of comprehensive income include(s) such proceeds and cost.

The amendments are applied retrospectively, but only to items of property, plant and equipment that are brought to the location and condition necessary for them to be capable of operating in the manner intended by management on or after the beginning of the earliest period presented in the financial statements in which the entity first applies the amendments.

The entity shall recognise the cumulative effect of initially applying the amendments as an adjustment to the opening balance of retained earnings (or other component of equity, as appropriate) at the beginning of that earliest period presented.

The amendments are effective for annual periods beginning on or after 1 January 2022, with early application permitted.

Amendments to IAS 37 Provisions, Contingent Liabilities and Contingent Assets—Onerous Contracts—Cost of Fulfilling a Contract

The amendments specify that the 'cost of fulfilling' a contract comprises the 'costs that relate directly to the contract'. Costs that relate directly to a contract consist of both the incremental costs of fulfilling that contract (examples would be direct labour or materials) and an allocation of other costs that relate directly to fulfilling contracts (an example would be the allocation of the depreciation charge for an item of property, plant and equipment used in fulfilling the contract).

The amendments apply to contracts for which the entity has not yet fulfilled all its obligations at the beginning of the annual reporting period in which the entity first applies the amendments. Comparatives are not restated. Instead, the entity shall recognise the cumulative effect of initially applying the amendments as an adjustment to the opening balance of retained earnings or other component of equity, as appropriate, at the date of initial application.

The amendments are effective for annual periods beginning on or after 1 January 2022, with early application permitted.

Annual Improvements to IFRS Standards 2018-2020—Amendments to IFRS 1 First-time Adoption of International Financial Reporting Standards, IFRS 9 Financial Instruments, IFRS 16 Leases, and IAS 41 Agriculture

The Annual Improvements include amendments to four Standards.

<u>IFRS 1 First-time Adoption of International Financial Reporting Standards</u>

The amendment provides additional relief to a subsidiary which becomes a first-time adopter later than its parent in respect of accounting for cumulative translation differences. As a result of the amendment, a subsidiary that uses the exemption in IFRS 1:D16(a) can now also elect to measure cumulative translation differences for all foreign operations at the carrying amount that would be included in the parent's consolidated financial statements, based on the parent's date of transition to IFRS Standards, if no adjustments were made for consolidation procedures and for the effects of the business combination in which the parent acquired the subsidiary. A similar election is available to an associate or joint venture that uses the exemption in IFRS 1:D16(a).

The amendment is effective for annual periods beginning on or after 1 January 2022, with early application permitted.

IFRS 9 Financial Instruments

The amendment clarifies that in applying the '10 per cent' test to assess whether to derecognise a financial liability, an entity includes only fees paid or received between the entity (the borrower) and the lender, including fees paid or received by either the entity or the lender on the other's behalf.

The amendment is applied prospectively to modifications and exchanges that occur on or after the date the entity first applies the amendment.

The amendment is effective for annual periods beginning on or after 1 January 2022, with early application permitted.

IFRS 16 Leases

The amendment removes the illustration of the reimbursement of leasehold improvements.

As the amendment to IFRS 16 only regards an illustrative example, no effective date is stated.

IAS 41 Agriculture

The amendment removes the requirement in IAS 41 for entities to exclude cash flows for taxation when measuring fair value. This aligns the fair value measurement in IAS 41 with the requirements of IFRS 13 *Fair Value Measurement* to use internally consistent cash flows and discount rates and enables preparers to determine whether to use pre-tax or post-tax cash flows and discount rates for the most appropriate fair value measurement.

The amendment is applied prospectively, i.e. for fair value measurements on or after the date an entity initially applies the amendment.

The amendment is effective for annual periods beginning on or after 1 January 2022, with early application permitted.

Amendments to IAS 1 Presentation of Financial Statements and IFRS Practice Statement 2 Making Materiality Judgements—Disclosure of Accounting Policies

The amendments change the requirements in IAS 1 with regard to disclosure of accounting policies. The amendments replace all instances of the term 'significant accounting policies' with 'material accounting policy information'. Accounting policy information is material if, when considered together with other information included in an entity's financial statements, it can reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements.

The supporting paragraphs in IAS 1 are also amended to clarify that accounting policy information that relates to immaterial transactions, other events or conditions is immaterial and need not be disclosed. Accounting policy information may be material because of the nature of the related transactions, other events or conditions, even if the amounts are immaterial. However, not all accounting policy information relating to material transactions, other events or conditions is itself material.

The Board has also developed guidance and examples to explain and demonstrate the application of the 'four-step materiality process' described in IFRS Practice Statement 2.

The amendments to IAS 1 are effective for annual periods beginning on or after 1 January 2023, with earlier application permitted and are applied prospectively. The amendments to IFRS Practice Statement 2 do not contain an effective date or transition requirements.

Amendments to IAS 8 Accounting Polices, Changes in Accounting Estimates and Errors—Definition of Accounting Estimates

The amendments replaces the definition of a change in accounting estimates with a definition of accounting estimates. Under the new definition, accounting estimates are “monetary amounts in financial statements that are subject to measurement uncertainty”.

The definition of a change in accounting estimates was deleted. However, the Board retained the concept of changes in accounting estimates in the Standard with the following clarifications:

- A change in accounting estimate that results from new information or new developments is not the correction of an error;
- The effects of a change in an input or a measurement technique used to develop an accounting estimate are changes in accounting estimates if they do not result from the correction of prior period errors.

The Board added two examples (Examples 4-5) to the Guidance on implementing IAS 8, which accompanies the Standard. The Board has deleted one example (Example 3) as it could cause confusion in light of the amendments.

The amendments are effective for annual periods beginning on or after 1 January 2023 to changes in accounting policies and changes in accounting estimates that occur on or after the beginning of that period, with earlier application permitted.

Amendments *to IAS 12 Income Taxes—Deferred Tax related to Assets and Liabilities arising from a Single Transaction*

The amendments introduce a further exception from the initial recognition exemption. Under the amendments, an entity does not apply the initial recognition exemption for transactions that give rise to equal taxable and deductible temporary differences.

Depending on the applicable tax law, equal taxable and deductible temporary differences may arise on initial recognition of an asset and liability in a transaction that is not a business combination and affects neither accounting nor taxable profit. For example, this may arise upon recognition of a lease liability and the corresponding right-of-use asset applying IFRS 16 at the commencement date of a lease.

Following the amendments to IAS 12, an entity is required to recognise the related deferred tax asset and liability, with the recognition of any deferred tax asset being subject to the recoverability criteria in IAS 12.

The Board also adds an illustrative example to IAS 12 that explains how the amendments are applied.

The amendments apply to transactions that occur on or after the beginning of the earliest comparative period presented. In addition, at the beginning of the earliest comparative period an entity recognises:

- A deferred tax asset (to the extent that it is probable that taxable profit will be available against which the deductible temporary difference can be utilised) and a deferred tax liability for all deductible and taxable temporary differences associated with:
  - Right-of-use assets and lease liabilities
  - Decommissioning, restoration and similar liabilities and the corresponding amounts recognised as part of the cost of the related asset
- The cumulative effect of initially applying the amendments as an adjustment to the opening balance of retained earnings (or other component of equity, as appropriate) at that date.

The amendments are effective for annual reporting periods beginning on or after 1 January 2023, with earlier application permitted.

7 Cash and Cash Equivalents

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Cash on hand	33,317	42,705
Cash balances with the NBG (other than mandatory reserve deposits)	51,515	195,464
Correspondent accounts and overnight placements with other banks	106,834	91,554
Placements with other banks with original maturities of less than three months	383	75,945
Less credit loss allowance	(256)	(579)
Total cash and cash equivalents	**191,793**	**405,089**

The cash and cash equivalent balances under the bank's separate financial statement as at 31 December 2021 amount GEL 189,311 thousand (2020: GEL 403,190 thousand). Subsidiaries attributed GEL 2,482 thousand to the Group's balance at 31 December 2021, (2020: GEL 1,905 thousand).

The table below discloses the credit quality of cash and cash equivalents balances based on credit risk grades at 31 December 2021. Refer to Note 31 for the description of the Group's credit risk grading system. Amounts are presented net of credit loss allowance:

In thousands of Georgian Lari	Cash balances with the NBG, excluding mandatory reserves	Correspondent accounts and overnight placements	Placements with other banks, with maturity of less than three months	Total
- Excellent	-	100,025	-	100,025
- Good	51,403	4,476	-	55,879
- Satisfactory	-	90	-	90
- Special monitoring	-	68	-	68
- Unrated	-	2,031	383	2,414
Total cash and cash equivalents, excluding cash on hand	**51,403**	**106,690**	**383**	**158,476**

The credit quality of cash and cash equivalents balances based on credit risk grades at 31 December 2020 is as follows:

In thousands of Georgian Lari	Cash balances with the NBG, excluding mandatory reserves	Correspondent accounts and overnight placements	Placements with other banks, with maturity of less than three months	Total
- Excellent	-	84,382	75,867	160,249
- Good	195,090	6,842	-	201,932
- Satisfactory	-	137	-	137
- Special monitoring	-	66	-	66
Total cash and cash equivalents, excluding cash on hand	**195,090**	**91,427**	**75,867**	**362,384**

As at 31 December 2021 there were two placements with unrated Georgian banks with aggregate amount of GEL 2,415. (2020: there were no significant placements with unrated Georgian banks.)

7 Cash and Cash Equivalents (Continued)

At 31 December 2021 the Group had one counterparty bank (2020: two banks) with aggregated cash and cash equivalent balance above 10% of equity. The total aggregate amount of these balance was GEL 71,717 thousand (2020: GEL 154,709 thousand) or 37% of the cash and cash equivalents (2020: 38%).

For the purpose of ECL measurement cash and cash equivalents balances are included in Stage 1. Refer to Note 31 for the ECL measurement approach.

Interest rate analysis of cash and cash equivalents is disclosed in Note 31. Information on related party balances is disclosed in Note 36.

The cash balances with the NBG (other than mandatory reserve deposits) represent balances with the NBG related to settlement activity and were available for withdrawal at year end.

8 Mandatory cash balances with the National Bank of Georgia

Mandatory cash balances with the National Bank of Georgia ("NBG") represent amounts deposited with the NBG. Resident financial institutions are required to maintain an interest-earning obligatory reserve with the NBG, whose availability is restricted and the amount of which depends on the level of funds attracted by the financial institutions.

In August 2021, Fitch Ratings revised Georgia's outlook from 'Negative' to 'Stable' and affirmed the long-term credit rating of "BB".

Interest rate analysis of Mandatory cash balances with the NBG is in Note 31.
For the purpose of ECL measurement Mandatory cash balances with the NBG are included in Stage 1. As at 31 December 2021, ECL for the Mandatory cash balances with the NBG amounts to GEL 386 thousand. In 2020 the Group did not recognise any credit loss allowance for Mandatory cash balances with the NBG. Refer to Note 32 for the ECL measurement approach.

9 Due from Other Banks

In thousands of Georgian Lari	December 31, 2021	December 31 2020
Placements with other banks with original maturities of more than three months	12,932	13,424
Less credit loss allowance	(33)	-
Total due from other banks	**12,899**	**13,424**

For the purpose of ECL measurement due from other banks balances are included in Stage 1. Refer to Note 31 for the ECL measurement approach.

The credit quality of due from other bank balances based on credit risk grades are as follows:

In thousands of Georgian Lari	**December 31, 2021**	**December 31, 2020**
- Excellent	4,063	3,012
- Good	-	1,812
- Not rated	8,836	8,600
Total due from other banks	**12,899**	**13,424**

Due from Other Banks represent term placements of the subsidiaries with other Georgian banks.

9 Due from Other Banks (Continued)

Refer to Note 35 for the estimated fair value of each class of amounts due from other banks. Interest rate analysis of due from other banks is disclosed in Note 31. Information on related party balances is disclosed in Note 36.

10 Investments in Debt Securities

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Debt securities at FVOCI	39,185	23,868
Debt securities at AC	171,514	261,765
Total investments in debt securities	**210,699**	**285,633**

The table below discloses investments in debt securities at 31 December 2021 by measurement categories and classes:

In thousands of Georgian Lari	Debt securities at FVOCI	Debt securities at AC	Total
Georgian government treasury bonds	39,270	142,738	182,008
Georgian government treasury bills	-	10,756	10,756
Corporate bonds	-	18,542	18,542
Total investments in debt securities at 31 December 2021	**39,270**	**172,036**	**211,306**
Credit loss allowance	(85)	(522)	(607)
Total investments in debt securities at 31 December 2021 (carrying value)	**39,185**	**171,514**	**210,699**

The table below discloses investments in debt securities at 31 December 2020 by measurement categories and classes:

In thousands of Georgian Lari	Debt securities at FVOCI	Debt securities at AC	Total
Georgian government treasury bonds	23,914	202,793	226,707
Georgian government treasury bills	-	28,191	28,191
Corporate bonds	-	31,390	31,390
Total investments in debt securities at 31 December 2021	**23,914**	**262,374**	**286,288**
Credit loss allowance	(46)	(609)	(655)
Total investments in debt securities at 31 December 2021 (carrying value)	**23,868**	**261,765**	**285,633**

The Bank is participating in Georgian Government Market-making Pilot Program "Primary Dealer", the participation requires from the eligible participants to comply with the requirements and criteria set by the rules of the program such as regular participation in treasury bond issue auctions and minimum purchase volumes. Debt securities at FVOCI are intended for trading and were purchased with the purpose to participate in the program.

10 Investments in Debt Securities (Continued)

For the purpose of ECL measurement as at 31 December 2021 and 2020 the securities at FVOCI and AC originated in 2020 and 2021 belong to stage 1. Refer to Note 31 for the description of credit risk grading system used by the Group and the approach to ECL measurement, including the definition of default and SICR as applicable to debt securities at FVOCI and AC.

The carrying amount of debt securities at FVOCI and AC at 31 December 2021 below also represents the Group's maximum exposure to credit risk on these assets:

In thousands of Georgian Lari	**FVOCI**	**AC**	**Total**
Georgian government treasury bonds			
- Good	39,270	142,738	182,008
Gross carrying amount	39,270	142,738	182,008
Credit loss allowance	(85)	(277)	(362)
Carrying amount	**39,185**	**142,461**	**181,646**
Georgian government treasury bills			
- Good	-	10,756	10,756
Gross carrying amount	-	10,756	10,756
Credit loss allowance	-	(8)	(8)
Carrying amount	-	**10,748**	**10,748**
Corporate bonds			
- Good	-	18,542	18,542
Gross carrying amount	-	18,542	18,542
Credit loss allowance	-	(237)	(237)
Carrying amount	-	**18,305**	**18,305**
Total investments in debt securities	**39,270**	**172,036**	**211,306**
Credit loss allowance	(85)	(522)	(607)
Total investments in debt securities (carrying amount)	**39,185**	**171,514**	**210,699**

10 Investments in Debt Securities (Continued)

The carrying amount of debt securities at FVOCI and AC at 31 December 2020.

In thousands of Georgian Lari	FVOCI	AC	Total
Georgian government treasury bonds			
- Good	23,914	202,793	226,707
Gross carrying amount	23,914	202,793	226,707
Credit loss allowance	(46)	(265)	(311)
Carrying amount	**23,868**	**202,528**	**226,396**
Georgian government treasury bills			
- Good	-	28,191	28,191
Gross carrying amount	-	28,191	28,191
Credit loss allowance	-	(25)	(25)
Carrying amount	-	**28,166**	**28,166**
Corporate bonds			
- Good	-	31,390	31,390
Gross carrying amount	-	31,390	31,390
Credit loss allowance	-	(319)	(319)
Carrying amount	-	**31,071**	**31,071**
Total investments in debt securities	**23,914**	**262,374**	**286,288**
Credit loss allowance	(46)	(609)	(655)
Total investments in debt securities (carrying amount)	**23,868**	**261,765**	**285,633**

The debt securities at FVOCI and AC as at 31 December 2021 are not collateralised (2020: not collateralised).

At 31 December 2021 debt securities with a gross carrying value of GEL 122,001 thousand have been pledged for the short-term loans received NBG short-term loans as collateral (2020: GEL 215,203 thousand). Refer to Notes 17 and 19. The counterparty is not allowed to sell further or repledge the investments.

11 Loans and Advances to Customers

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Gross carrying amount of loans and advances to customers at AC	1,263,319	1,101,318
Less credit loss allowance	(23,586)	(26,065)
Total carrying amount of loans and advances to customers at AC	**1,239,733**	**1,075,253**

As at 31 December 2021 the Group identified 100% of portfolio of loans and advances to customers to meet the SPPI requirement for AC classification under IFRS 9.

Gross carrying amount and credit loss allowance amount for loans and advances to customers at AC by classes at 31 December 2021 and 31 December 2020 are disclosed in the table below:

	December 31, 2021			December 31, 2020		
In thousands of Georgian Lari	Gross carrying amount	Credit loss allowance	Carrying amount	Gross carrying amount	Credit loss allowance	Carrying amount
Loans to Legal entities	**1,017,862**	**(19,530)**	**998,332**	**885,338**	**(21,425)**	**863,913**
Loans to Large entities	810,236	(14,831)	795,405	697,923	(17,155)	680,768
Loans to SME	207,626	(4,699)	202,927	187,415	(4,270)	183,145
Loans to individuals	**245,457**	**(4,056)**	**241,401**	**215,980**	**(4,640)**	**211,340**
Mortgage loans	174,191	(2,180)	172,011	153,520	(2,955)	150,565
Consumer loans	68,665	(1,343)	67,322	59,449	(1,514)	57,935
Credit cards	2,601	(533)	2,068	3,011	(171)	2,840
Total loans and advances to customers at AC	**1,263,319**	**(23,586)**	**1,239,733**	**1,101,318**	**(26,065)**	**1,075,253**

More detailed explanation of classes of standard loans to legal entities is provided below:

- Loans issued to large business entities under the standard terms, mainly for working capital financing and investment projects; and
- Loans to SME – loans issued to small and medium-sized enterprises, where the Group defines such as loans issued to a client up to USD 1 million;

As at December 31, 2021 and 2020 a significant amount of loans (79% and 78% of total loans to customers) is granted to companies and individuals operating and residing in Georgia, which represents a significant geographical concentration in one region.

Mortgage loans with outstanding principal of GEL 62,395 thousand and SME loans with outstanding principal of GEL 39,306 thousand are pledged for short term loan from NBG at 31 December 2020 (2019: mortgage loans GEL 64,390 thousand and SME loans GEL 19,017 thousand pledged for short-term loans from NBG). Refer to Note 17.

11 Loans and Advances to Customers (Continued)

The following tables disclose the changes in the credit loss allowance and gross carrying amount for loans and advances to customers carried at amortised cost between the beginning and the end of the reporting and comparative periods:

	Credit loss allowance				Gross carrying amount			
In thousands of Georgian Lari	**Stage 1 (12-nonths ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**
Loans to Legal entities								
At 31 December, 2020	**(1,908)**	**(891)**	**(18,626)**	**(21,425)**	**755,338**	**63,715**	**66,285**	**885,338**
Movements with impact on credit loss allowance charge for the period:								
Transfers:								
- to lifetime (from Stage 1 to Stage 2)	442	(1,231)	-	(789)	(49,676)	49,676	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	1,390	105	(3,681)	(2,186)	(12,392)	(11,849)	24,241	-
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	(1,041)	826	47	(168)	47,254	(46,290)	(964)	-
to lifetime (from Stage 3 credit impaired to Stage 2)	-	(5,423)	5,623	200	-	20,956	(20,956)	-
New originated or purchased	(6,862)			(6,862)	714,851			714,851
Repayments	2,905	1,084	5,955	9,944	(826,695)	(57,067)	(23,753)	(907,515)
Other movements*	1,008	970	(2,992)	(1,014)	340,071	28,316	3,627	372,014
Total movements with impact on credit loss allowance charge for the period	**(2,158)**	**(3,669)**	**4,952**	**(875)**	**213,413**	**(16,258)**	**(17,805)**	**179,350**
Movements without impact on credit loss allowance charge for the period:								
Write-offs	-	-	1,278	1,278	-	-	(1,278)	(1,278)
Foreign exchange gains and losses and other movements	112	702	677	1,491	(38,349)	(4,667)	(2,532)	(45,548)
At 31 December, 2021	**(3,954)**	**(3,858)**	**(11,719)**	**(19,531)**	**930,402**	**42,790**	**44,670**	**1,017,862**

11 Loans and Advances to Customers (Continued)

In thousands of Georgian Lari	Credit loss allowance Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total	Gross carrying amount Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total
Loans to Legal entities								
At 31 December, 2019	**(1,770)**	**(394)**	**(10,301)**	**(12,465)**	**667,811**	**89,726**	**39,414**	**796,951**
Movements with impact on credit loss allowance charge for the period:								
Transfers:								
- to lifetime (from Stage 1 to Stage 2)	1,130	(1,639)	-	(509)	(97,194)	97,194	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	1,751	445	(8,327)	(6,131)	(31,309)	(23,826)	55,135	-
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	(649)	1,119	51	521	48,240	(47,517)	(723)	-
to lifetime (from Stage 3 credit impaired to Stage 2)	-	(66)	87	21	-	1,330	(1,330)	-
- Changes due to modifications that did not result in derecognition	(2)	-	(22)	(24)	(471)	(23)	(73)	(567)
New originated or purchased	(4,610)	-	-	(4,610)	613,435	-	-	613,435
Repayments	3,179	1,853	5,645	10,677	(715,635)	(96,615)	(35,124)	(847,374)
Other movements*	(656)	(1,961)	(4,322)	(6,939)	202,805	30,477	2,939	236,221
Total movements with impact on credit loss allowance charge for the period	**143**	**(249)**	**(6,888)**	**(6,994)**	**19,871**	**(38,980)**	**20,824**	**1,715**
Movements without impact on credit loss allowance charge for the period:								
Write-offs	-	-	46	46	-	-	(46)	(46)
Foreign exchange gains and losses and other movements	(281)	(248)	(1,483)	(2,012)	67,656	12,969	6,093	86,718
At 31 December, 2020	**(1,908)**	**(891)**	**(18,626)**	**(21,425)**	**755,338**	**63,715**	**66,285**	**885,338**

*Other movements include additional disbursements on earlier originated loans and utilisation of credit lines reflecting the increase in exposure. ECL rate change is also reflected in other movements, were there is no change in an exposure stage.

11 Loans and Advances to Customers (Continued)

	Credit loss allowance				Gross carrying amount			
In thousands of Georgian Lari	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**
Mortgage loans								
At 31 December, 2020	**(108)**	**(7)**	**(2,840)**	**(2,955)**	**135,879**	**5,568**	**12,073**	**153,520**
Movements with impact on credit loss allowance charge for the period:								
Transfers:								
- to lifetime (from Stage 1 to Stage 2)	11	(47)	-	(36)	(6,052)	6,052	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	15	24	(1,163)	(1,124)	(1,300)	(4,515)	5,815	-
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	(10)	10	391	391	4,400	(3,004)	(1,396)	-
to lifetime (from Stage 3 credit impaired to Stage 2)	-	(13)	280	267	-	1,493	(1,493)	-
New originated or purchased	(230)			(230)	80,461			80,461
Repayments	101	18	658	777	(54,427)	(2,122)	(3,265)	(59,814)
Other movements	45	(0)	383	428	3,616	215	467	4,298
Total movements with impact on credit loss allowance charge for the period	**(68)**	**(8)**	**549**	**473**	**26,698**	**(1,881)**	**128**	**24,945**
Movements without impact on credit loss allowance charge for the period:								
Write-offs	-	-	188	188	-	-	(188)	(188)
Foreign exchange gains and losses and other movements	7	1	108	116	(3,461)	(144)	(480)	(4,085)
At 31 December, 2021	**(169)**	**(14)**	**(1,995)**	**(2,178)**	**159,116**	**3,543**	**11,533**	**174,192**

11 Loans and Advances to Customers (Continued)

	Credit loss allowance				Gross carrying amount			
In thousands of Georgian Lari	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**
Mortgage loans								
At 31 December, 2019	**(229)**	**(23)**	**(1,099)**	**(1,351)**	**123,688**	**3,823**	**10,063**	**137,574**
Changes in Assumptions								
Movements with impact on credit loss allowance charge for the period:								
Transfers:								
- to lifetime (from Stage 1 to Stage 2)	25	(94)	-	(69)	(5,393)	5,393	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	59	30	(1,031)	(942)	(3,323)	(2,205)	5,528	-
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	(23)	38	14	29	2,282	(2,105)	(177)	-
to lifetime (from Stage 3 credit impaired to Stage 2)	-	(96)	242	146	-	1,698	(1,698)	-
- Changes due to modifications that did not result in derecognition	-	-	(4)	(4)	(721)	(42)	(24)	(787)
New originated or purchased	(268)	-	-	(268)	49,432	-	-	49,432
Repayments	186	26	590	802	(42,811)	(1,560)	(3,276)	(47,647)
Other movements	159	122	(1,419)	(1,138)	4,811	219	576	5,606
Total movements with impact on credit loss allowance charge for the period	**138**	**26**	**(1,608)**	**(1,444)**	**4,277**	**1,398**	**929**	**6,604**
Movements without impact on credit loss allowance charge for the period:								
Write-offs	-	-	-	-	-	-	-	-
Foreign exchange gains and losses and other movements	(17)	(10)	(133)	(160)	7,914	347	1,081	9,342
At 31 December, 2020	**(108)**	**(7)**	**(2,840)**	**(2,955)**	**135,879**	**5,568**	**12,073**	**153,520**

11 Loans and Advances to Customers (Continued)

	Credit loss allowance				Gross carrying amount			
In thousands of Georgian Lari	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**
Consumer loans								
At 31 December, 2020	**(320)**	**(20)**	**(1,174)**	**(1,514)**	**51,625**	**3,575**	**4,249**	**59,449**
Changes in Assumptions								
Movements with impact on credit loss allowance charge for the period:								
Transfers:								
- to lifetime (from Stage 1 to Stage 2)	13	(48)	-	(35)	(3,841)	3,841	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	70	10	(621)	(541)	(501)	(1,842)	2,343	-
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	(6)	13	41	48	1,894	(1,730)	(164)	-
to lifetime (from Stage 3 credit impaired to Stage 2)	-	(19)	160	141	-	807	(807)	-
New originated or purchased	(259)	-	-	(259)	57,408			57,408
Payments	175	24	564	763	(46,784)	(2,226)	(2,326)	(51,336)
Other movements	(66)	22	(938)	(982)	3,331	566	707	4,604
Total movements with impact on credit loss allowance charge for the period	**(73)**	**2**	**(794)**	**(865)**	**11,507**	**(584)**	**(247)**	**10,676**
Movements without impact on credit loss allowance charge for the period:								
Write-offs	-	-	1,030	1,030	(0)	-	(1,030)	(1,030)
Foreign exchange gains and losses and other movements	1	-	5	6	(374)	(26)	(30)	(430)
At 31 December, 2021	**(392)**	**(18)**	**(933)**	**(1,343)**	**62,758**	**2,965**	**2,942**	**68,665**

11 Loans and Advances to Customers (Continued)

	Credit loss allowance				Gross carrying amount			
In thousands of Georgian Lari	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**
Consumer loans								
At 31 December, 2019	**(346)**	**(24)**	**(998)**	**(1,368)**	**54,509**	**3,271**	**3,760**	**61,540**
Changes in Assumptions								
Movements with impact on credit loss allowance charge for the period:								
Transfers:								
- to lifetime (from Stage 1 to Stage 2)	40	(68)	-	(28)	(4,439)	4,439	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	16	71	(638)	(551)	(1,271)	(2,340)	3,611	-
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	(24)	26	22	24	1,096	(1,016)	(80)	-
to lifetime (from Stage 3 credit impaired to Stage 2)	-	(29)	85	56	-	442	(442)	-
- Changes due to modifications that did not result in derecognition	(2)	-	(13)	(15)	(475)	(45)	(40)	(560)
New originated or purchased	(224)	-	-	(224)	34,729	-	-	34,729
Repayments	407	45	502	954	(37,340)	(3,129)	(2,053)	(42,522)
Other movements	(187)	(40)	(1,074)	(1,301)	4,374	1,884	321	6,579
Total movements with impact on credit loss allowance charge for the period	**26**	**5**	**(1,116)**	**(1,085)**	**(3,326)**	**235**	**1,317**	**(1,774)**
Movements without impact on credit loss allowance charge for the period:								
Write-offs	-	-	949	949	-	-	(949)	(949)
Foreign exchange gains and losses and other movements	-	(1)	(9)	(10)	442	69	121	632
At 31 December, 2020	**(320)**	**(20)**	**(1,174)**	**(1,514)**	**51,625**	**3,575**	**4,249**	**59,449**

11 Loans and Advances to Customers (Continued)

In thousands of Georgian Lari	Credit loss allowance				Gross carrying amount			
	Stage 1 (12-months ECL)	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**
Credit cards								
At 31 December, 2020	**(17)**	**(6)**	**(148)**	**(171)**	**2,014**	**649**	**348**	**3,011**
Movements with impact on credit loss allowance charge for the period:								
Transfers:								
- to lifetime (from Stage 1 to Stage 2)	6	(3)	-	3	(739)	739	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	301	2	(283)	20	(667)	(386)	1,053	-
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	(1)	13	-	12	256	(256)	-	-
to lifetime (from Stage 3 credit impaired to Stage 2)	-	-	7	7	-	17	(17)	-
New originated or purchased	(336)	-	-	(336)	2,747	-	-	2,747
Repayments	255	52	1,069	1,376	(13,456)	(4,033)	(3,994)	(21,483)
Other movements	(217)	(65)	(1,316)	(1,598)	11,118	3,729	3,521	18,368
Total movements with impact on credit loss allowance charge for the period	**8**	**(1)**	**(523)**	**(516)**	**(741)**	**(190)**	**563**	**(368)**
Movements without impact on credit loss allowance charge for the period:								
Write-offs	-	-	161	161	-	-	(160)	(160)
Foreign exchange gains and losses and other movements	(3)	-	(4)	(7)	91	6	21	118
At 31 December, 2021	**(12)**	**(7)**	**(514)**	**(533)**	**1,364**	**465**	**772**	**2,601**

11 Loans and Advances to Customers (Continued)

In thousands of Georgian Lari	Credit loss allowance				Gross carrying amount			
	Stage 1 (12-months ECL)	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**
Credit cards								
At 31 December, 2019	**-**	**(38)**	**(213)**	**(251)**	**-**	**4,031**	**332**	**4,363**
Movements with impact on credit loss allowance charge for the period:								
Transfers:								
- to lifetime (from Stage 1 to Stage 2)	7	(5)	-	2	(405)	405	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	121	1	(173)	(51)	(403)	(127)	530	-
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	(15)	13	-	(2)	1,688	(1,688)	-	-
New originated or purchased	(136)	-	-	(136)	1,804	-	-	1,804
Repayments	26	292	123	441	(2,291)	(19,648)	(252)	(22,191)
Other movements	(19)	(531)	(188)	(738)	1,589	18,467	40	20,096
Total movements with impact on credit loss allowance charge for the period	**(16)**	**(230)**	**(238)**	**(484)**	**1,982**	**(2,591)**	**318**	**(291)**
Movements without impact on credit loss allowance charge for the period:								
Write-offs	-	262	302	564	-	(262)	(303)	(565)
Foreign exchange gains and losses and other movements	(1)		1	-	32	(529)	1	(496)
At 31 December, 2020	**(17)**	**(6)**	**(148)**	**(171)**	**2,014**	**649**	**348**	**3,011**

*Net decrease in credit cards exposures during the period is disclosed in payments and net increase is in other movements.

11 Loans and Advances to Customers (Continued)

Movements in provision for impairment in 2021 were as follows:

In thousands of Georgian Lari	Loans to legal entities	Mortgage loans	Consumer loans	Credit cards	Total
Provision for loans as at 1 January 2021	**21,425**	**2,955**	**1,514**	**171**	**26,065**
Total movements with impact on credit loss allowance charge for the period	502	-513	508	373	870
Foreign exchange gains and losses and other movements	(1,492)	(116)	(6)	7	(1,607)
Write-offs	(1,278)	(188)	(1,030)	(161)	(2,657)
Recovery	373	42	357	143	915
Provision for loans as at 31 December 2021	**19,530**	**2,180**	**1,343**	**533**	**23,586**

Movements in provision for impairment in 2020 were as follows:

In thousands of Georgian Lari	Loans to legal entities	Mortgage loans	Consumer loans	Credit cards	Total
Provision for loans as at 1 January 2020	**12,468**	**1,351**	**1,368**	**250**	**15,437**
Total movements with impact on credit loss allowance charge for the period	6,837	1,427	856	422	9,542
Foreign exchange gains and losses and other movements	2,107	160	10	-	2,277
Write-offs	(46)	-	(949)	(564)	(1,559)
Recovery	59	17	229	63	368
Provision for loans as at 31 December 2020	**21,425**	**2,955**	**1,514**	**171**	**26,065**

The credit loss allowance for loans and advances to customers recognised in the period is impacted by a variety of factors, details of ECL measurement are provided in Note 31. Below main movements in the table are described:

- Transfers between Stage 1, 2 and 3 due to balances experiencing significant increases (or decreases) of credit risk or becoming credit-impaired in the period, and the consequent "step up" (or "step down") between 12-month and Lifetime ECL;
- Additional allowances for new financial instruments recognised during the period, as well as releases for financial instruments derecognised in the period;
- Write-offs of allowances related to assets that were written off during the period.

The following tables contain analyses of the credit risk exposure of loans and advances to customers measured at AC and for which an ECL allowance is recognised. The carrying amount of loans and advances to customers below also represents the Group's maximum exposure to credit risk on these loans.

11 Loans and Advances to Customers (Continued)

The credit quality of loans to Legal entities carried at amortised cost is as follows at 31 December 2021:

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total
Loans to legal entities				
- Excellent	11,365	-	-	11,365
- Good	919,037	-	-	919,037
- Satisfactory	-	41,859	3,209	45,068
- Special monitoring	-	932	-	932
- Default	-	-	41,460	41,460
Gross carrying amount	**930,402**	**42,791**	**44,669**	**1,017,862**
Credit loss allowance	(3,953)	(3,856)	(11,721)	(19,530)
Carrying amount	**926,449**	**38,935**	**32,948**	**998,332**

The credit quality of Legal entities carried at amortised cost is as follows at 31 December 2020:

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total
Loans to legal entities				
- Excellent	77,902	-	-	77,902
- Good	677,436	-	-	677,436
- Satisfactory	-	63,229	-	63,229
- Special monitoring	-	486	-	486
- Default	-	-	66,285	66,285
Gross carrying amount	**755,338**	**63,715**	**66,285**	**885,338**
Credit loss allowance	(1,908)	(891)	(18,626)	(21,425)
Carrying amount	**753,430**	**62,824**	**47,659**	**863,913**

11 Loans and Advances to Customers (Continued)

The credit quality of loans to individuals carried at amortised cost is as follows at 31 December 2021:

In thousands of Georgian Lari	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**
Mortgage loans				
- Excellent	132	-	-	132
- Good	158,983	-	-	158,983
- Satisfactory	-	2,637	-	2,637
- Special monitoring	-	906	-	906
- Default	-	-	11,533	11,533
Gross carrying amount	**159,115**	**3,543**	**11,533**	**174,191**
Credit loss allowance	(170)	(15)	(1,995)	(2,180)
Carrying amount	**158,945**	**3,528**	**9,538**	**172,011**
Consumer loans				
- Excellent	1,142	-	-	1,142
- Good	61,617	-	-	61,617
- Satisfactory	-	2,358	-	2,358
- Special monitoring	-	607	-	607
- Default	-	-	2,941	2,941
Gross carrying amount	**62,759**	**2,965**	**2,941**	**68,665**
Credit loss allowance	(392)	(18)	(933)	(1,343)
Carrying amount	**62,367**	**2,947**	**2,008**	**67,322**
Credit cards				
- Good	1,364	-	-	1,364
- Satisfactory	-	465	-	465
- Default	-	-	771	771
Gross carrying amount	**1,364**	**465**	**772**	**2,601**
Credit loss allowance	(12)	(7)	(514)	(533)
Carrying amount	**1,352**	**459**	**257**	**2,068**

11 Loans and Advances to Customers (Continued)

The credit quality of loans to individuals carried at amortised cost is as follows at 31 December 2020:

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total
Mortgage loans				
- Excellent	3,218	-	-	3,218
- Good	132,661	-	-	132,661
- Satisfactory	-	5,124	-	5,124
- Special monitoring	-	444	-	444
- Default	-	-	12,073	12,073
Gross carrying amount	**135,879**	**5,568**	**12,073**	**153,520**
Credit loss allowance	(108)	(7)	(2,840)	(2,955)
Carrying amount	**135,771**	**5,561**	**9,233**	**150,565**
Consumer loans				
- Excellent	3,648	-	-	3,648
- Good	47,977	-	-	47,977
- Satisfactory	-	3,156	-	3,156
- Special monitoring	-	419	-	419
- Default	-	-	4,249	4,249
Gross carrying amount	**51,625**	**3,575**	**4,249**	**59,449**
Credit loss allowance	(320)	(20)	(1,174)	(1,514)
Carrying amount	**51,305**	**3,555**	**3,075**	**57,935**
Credit cards				
- Good	2,014	-	-	2,014
- Satisfactory	-	649	-	649
- Default	-	-	348	348
Gross carrying amount	**2,014**	**649**	**348**	**3,011**
Credit loss allowance	(17)	(6)	(148)	(171)
Carrying amount	**1,997**	**643**	**199**	**2,840**

11 Loans and Advances to Customers (Continued)

For description of the credit risk grading used in the tables above refer to Note 31.

Economic sector risk concentrations within the customer loan portfolio are as follows:

	December 31, 2021		December 31, 2020	
In thousands of Georgian Lari	**Amount**	**%**	**Amount**	**%**
Individuals	246,046	20%	215,980	20%
Tourism & Restaurants	147,818	13%	148,918	13%
Real Estate Management	126,123	10%	135,796	12%
Trade	117,819	9%	87,094	8%
Real Estate Development	91,859	7%	39,610	4%
Construction & Production of Construction materials	78,510	6%	72,792	7%
Financial Institutions	69,236	5%	94,842	9%
Health Care	62,362	5%	65,364	6%
Agricultural	61,848	5%	45,513	4%
Production & Manufacturing	55,854	4%	35,330	3%
Energy	55,624	4%	51,027	5%
Service	51,750	4%	53,731	4%
State	49,126	4%	-	0%
Wine production	43,253	3%	53,657	5%
Other	6,091	1%	1,664	0%
Total loans and advances to customers carried at AC	**1,263,319**	**100%**	**1,101,318**	**100%**

At 31 December 2021 the Group had 9 borrowers' groups (2020: 12 borrowers) with aggregated loan amounts above 5% of the Bank's regulatory capital. The total aggregate amount of these loans was GEL 186,653 thousand (2020: GEL 260,204 thousand) or 15% of the gross loan portfolio (2020: 24%).

The Group's policies regarding obtaining collateral have not significantly changed during the reporting period and there has been no significant change in the overall quality of the collateral held by the Group since the prior period. The table below summarises carrying value of loans to customers analysed by type of collateral obtained by the Group as at 31 December 2021:

In thousands of Georgian Lari	**Loans to legal entities**	**Mortgage loans**	**Consumer loans**	**Credit cards**	**Total**
Loans collateralised by:					
- real estate	751,222	172,670	34,100	-	957,992
- cash deposits	33,925	586	1,380	-	35,891
- Transport and equipment	35,204	-	299	-	35,503
- other assets	37,697	14	1	-	37,712
Total	858,048	173,270	35,780	-	1,067,098
Unsecured exposures	159,814	921	32,884	2,602	196,221
Total carrying value loans and advances to customers at AC (amount representing exposure to credit risk for each class of loans at AC)	**1,017,862**	**174,191**	**68,664**	**2,602**	**1,263,319**

11 Loans and Advances to Customers (Continued)

Information about collateral for loans to customers is as follows at 31 December 2020:

In thousands of Georgian Lari	Loans to legal entities	Mortgage loans	Consumer loans	Credit cards	Total
Loans collateralised by:					
- real estate	641,517	151,732	30,749	-	823,998
- cash deposits	72,135	661	3,004	-	75,800
- Transport and equipment	22,692	-	343	-	23,035
- other assets	30,485	6	4	20	30,515
Total	**766,829**	**152,399**	**34,100**	**20**	**953,348**
Unsecured exposures	118,509	1,121	25,349	2,991	147,970
Total carrying value loans and advances to customers at AC (amount representing exposure to credit risk for each class of loans at AC)	**885,338**	**153,520**	**59,449**	**3,011**	**1,101,318**

The carrying value of loans was allocated based on the type of collateral taken in following order: cash deposit, real estate, transport and equipment, other assets. Other assets mainly include securities and inventory. Part of mortgage loans issued for purchases of real estate with status of construction in progress is not secured with real estate before completion of legal registration procedures by the construction company. Until completion of these legal procedures the loans are secured by the construction company's guarantee. After completion of the registration procedures, the collateral will be replaced with real estate.

Third party guarantees received in the aggregate amount of GEL 5,278 thousand (2020: GEL 1,213 thousand) were not considered in the above table.

The disclosure above represents the lower of the carrying value of the loan or fair value collateral taken; the remaining part is disclosed within the unsecured exposures.

The extent to which collateral and other credit enhancements mitigate credit risk for financial assets carried at amortised cost that are credit impaired, is presented by disclosing collateral values separately for (i) those assets where collateral and other credit enhancements are equal to or exceed carrying value of the asset ("over-collateralised assets") and (ii) those assets where collateral and other credit enhancements are less than the carrying value of the asset ("under-collateralised assets").

The effect of collateral on credit impaired assets at 31 December 2021 is as follows.

	Under-collateralised Loans		**Over-collateralised Loans**	
In thousands of Georgian Lari	Carrying value of the loans	Value of collateral	Carrying value of the loans	Value of collateral
Credit impaired assets:				
Loans to legal entities carried at AC	12	-	44,657	181,568
Loans to individuals carried at AC				
Mortgage loans	172	171	11,361	26,624
Consumer loans	926	37	2,014	10,068
Credit cards	771	-	-	-

11 Loans and Advances to Customers (Continued)

The effect of collateral on credit impaired assets at 31 December 2020 is as follows.

	Under-collateralised Loans		Over-collateralised Loans	
In thousands of Georgian Lari	Carrying value of the loans	Value of collateral	Carrying value of the loans	Value of collateral
Credit impaired assets:				
Loans to legal entities carried at AC	16,765	828	49,520	201,177
Loans to individuals carried at AC				
Mortgage loans	891	-	3,358	19,310
Consumer loans	57	24	12,016	31,986
Credit cards	347	-	-	-

The Group obtains collateral valuation at the time of granting loans and annually re-evaluates real estate properties pledged for the loans which are included in top 100 borrower group list by carrying amount as at reporting date. Apart from top-100 borrower groups, for the loans with carrying amount more than GEL 100 thousand, the Group requests re-evaluation of the pledged real-estate collaterals if a new loan is disbursed under the pledge of the given collateral or in case of restructuring of the given commitment in case the last valuation is more than 1 year ago.

In order to assess the impact of old valuations on the assessment of ECL the Group has performed re-evaluation of the representative sample of collaterals with old valuations (older than one year) in 2021. Based on the results for the representative sample the possible impact of old valuations on ECL assessment was found insignificant for 2021, as market prices didn’t show significant change over time. Where there are indications that the carrying value of the loan might exceed fair value of collateral, the management discretionally obtains valuations for collateral for the affected properties.

The outstanding contractual amounts of loans and advances to customers written off that are still subject to enforcement activity was as follows at 31 December 2021 and 31 December 2020:

In thousands of Georgian Lari	**December 31, 2021**	**December 31, 2020**
Loans to Legal entities	1,278	46
Loans to individuals		
Mortgage loans	188	-
Consumer loans	1,030	949
Credit cards	161	564
Total	**2,657**	**1,559**

The Group’s policy is to complete legal enforcement steps that were initiated even though the loans were written off as there is no reasonable expectation of recovery.

Refer to Note 35 for the estimated fair value of each class of loans and advances to customers. Interest rate analysis of loans and advances to customers is disclosed in Note 31. Information on related party balances is disclosed in Note 36.

11 Loans and Advances to Customers (Continued)

Analysis by credit quality of loans to standard lending as at December 31, 2021 is presented as follows:

Loans to legal entities As at December 31, 2021	Gross loans	Provision for expected credit losses	Net loans	Provision for expected credit losses to gross loans
Collectively assessed				
Not past due	825,402	(2,607)	822,795	0.3%
Overdue:				
up to 30 days	10,676	(452)	10,224	4.2%
31 to 60 days	776	(32)	744	4.1%
61 to 90 days	445	(23)	422	5.2%
91 to 180 days	442	(104)	338	23.5%
over 180 days	6,349	(776)	5,573	12.2%
Total collectively assessed loans	**844,090**	**(3,994)**	**840,096**	**0.5%**
Individually assessed				
Not past due	156,520	(10,227)	146,293	6.5%
Overdue:				
up to 30 days	4,540	(1,813)	2,727	39.9%
31 to 60 days	3,209	(344)	2,865	10.7%
61 to 90 days	-	-	-	0.0%
91 to 180 days	4,792	(1,514)	3,278	31.6%
over 180 days	4,711	(1,638)	3,073	34.8%
Total individually assessed loans	**173,772**	**(15,536)**	**158,236**	**8.9%**
Total legal entity lending	**1,017,862**	**(19,530)**	**998,332**	**1.9%**

11 Loans and Advances to Customers (Continued)

Analysis by credit quality of loans to standard lending as at December 31, 2020 is presented as follows:

Loans to legal entities As at December 31, 2020	Gross loans	Provision for expected credit losses	Net loans	Provision for expected credit losses to gross loans
Collectively assessed				
Not past due	697,805	(2,847)	694,958	0.40%
Overdue:				
up to 30 days	2,170	(29)	2,141	1.30%
31 to 60 days	579	(18)	561	3.10%
61 to 90 days	713	(33)	680	4.60%
91 to 180 days	2,888	(820)	2,068	28.40%
over 180 days	6,801	(786)	6,015	11.60%
Total collectively assessed loans	**710,956**	**(4,533)**	**706,423**	**0.60%**
Individually assessed				
Not past due	139,464	(3,454)	136,010	2.50%
Overdue:				
up to 30 days	-	-	-	-
31 to 60 days	450	(237)	213	52.70%
61 to 90 days	-	-	-	-
91 to 180 days	19,628	(6,308)	13,320	32.10%
over 180 days	14,840	(6,893)	7,947	46.40%
Total individually assessed loans	**174,382**	**(16,892)**	**157,490**	9.70%
Total legal entity lending	**885,338**	**(21,425)**	**863,913**	**2.40%**

Analysis by credit quality of loans to mortgage loans as at December 31, 2021 is presented as follows:

Mortgage loans As at December 31, 2021	Gross loans	Provision for expected credit losses	Net loans	Provision for expected credit losses to gross loans
Collectively assessed				
Not past due	164,713	(1,242)	163,471	0.8%
Overdue:				
up to 30 days	4,760	(159)	4,601	3.3%
31 to 60 days	578	(37)	541	6.4%
61 to 90 days	518	(19)	499	3.7%
91 to 180 days	972	(157)	815	16.2%
over 180 days	2,650	(566)	2,084	21.4%
Total collectively assessed loans	**174,191**	**(2,180)**	**172,011**	**1.3%**
Total mortgage loans	**174,191**	**(2,180)**	**172,011**	**1.3%**

11 Loans and Advances to Customers (Continued)

Analysis by credit quality of loans to mortgage loans as at December 31, 2020 is presented as follows:

Mortgage loans As at December 31, 2020	Gross loans	Provision for expected credit losses	Net loans	Provision for expected credit losses to gross loans
Collectively assessed				
Not past due	145,223	(1,165)	144,058	0.8%
Overdue:				
up to 30 days	2,286	(5)	2,281	0.2%
31 to 60 days	664	(182)	482	27.4%
61 to 90 days	573	(147)	426	25.7%
91 to 180 days	806	(228)	578	28.2%
over 180 days	3,968	(1,228)	2,740	30.9%
Total collectively assessed loans	**153,520**	**(2,955)**	**150,565**	**1.9%**
Total mortgage loans	**153,520**	**(2,955)**	**150,565**	**1.9%**

Analysis by credit quality of loans to consumer loans as at December 31, 2021 is presented as follows:

Consumer loans As at December 31, 2021	Gross loans	Provision for expected credit losses	Net loans	Provision for expected credit losses to gross loans
Collectively assessed				
Not past due	64,827	(686)	64,141	1.1%
Overdue:				
up to 30 days	1,697	(58)	1,639	3.4%
31 to 60 days	481	(28)	453	5.8%
61 to 90 days	332	(12)	320	3.6%
91 to 180 days	732	(460)	272	62.8%
over 180 days	596	(99)	497	16.6%
Total collectively assessed loans	**68,665**	**(1,343)**	**67,322**	**2.0%**
Total consumer loans	**68,665**	**(1,343)**	**67,322**	**2.0%**

11 Loans and Advances to Customers (Continued)

Analysis by credit quality of loans to consumer loans as at December 31, 2020 is presented as follows:

Consumer loans As at December 31, 2020	Gross loans	Provision for expected credit losses	Net loans	Provision for expected credit losses to gross loans
Collectively assessed				
Not past due	55,669	(735)	54,934	1.3%
Overdue:				
up to 30 days	1,356	(57)	1,299	4.2%
31 to 60 days	454	(152)	302	33.5%
61 to 90 days	567	(140)	427	24.7%
91 to 180 days	577	(306)	271	53.0%
over 180 days	826	(124)	702	15.0%
Total collectively assessed loans	**59,449**	**(1,514)**	**57,935**	**2.5%**
Total consumer loans	**59,449**	**(1,514)**	**57,935**	**2.5%**

Analysis by credit quality of loans to credit cards as at December 31, 2021 is presented as follows:

Credit cards As at December 31, 2021	Gross loans	Provision for expected credit losses	Net loans	Provision for expected credit losses to gross loans
Collectively assessed				
Not past due	2,507	(474)	2,033	18.7%
Overdue:				
up to 30 days	32	(21)	11	65.6%
31 to 60 days	16	(11)	5	68.8%
61 to 90 days	24	(16)	8	66.7%
91 to 180 days	20	(13)	7	65.0%
over 180 days	2	2	4	100.0%
Total collectively assessed loans	**2,601**	**(533)**	**2,068**	**20.3%**
Total credit cards	**2,601**	**(533)**	**2,068**	**20.3%**

11 Loans and Advances to Customers (Continued)

Analysis by credit quality of loans to credit cards as at December 31, 2020 is presented as follows:

Credit cards As at December 31, 2020	Gross loans	Provision for expected credit losses	Net loans	Provision for expected credit losses to gross loans
Collectively assessed				
Not past due	2,875	(115)	2,760	3.90%
Overdue:				
up to 30 days	15	(6)	9	40.00%
31 to 60 days	64	(27)	37	42.20%
61 to 90 days	12	(5)	7	41.70%
91 to 180 days	44	(18)	26	40.90%
over 180 days	1	-	1	0.00%
Total collectively assessed loans	**3,011**	**(171)**	**2,840**	**5.70%**
Total credit cards	**3,011**	**(171)**	**2,840**	**5.70%**

Modified financial assets. As a result of the Group's forbearance activities financial assets might be modified. The following tables refer to modified financial assets where modification does not result in derecognition. Financial assets (with loss allowance based on lifetime ECL) modified during the period:

	December 31, 2020
Gross carrying amount before modification	**350,813**
Net amortised cost before modification	340,924
Net modification loss	(1,914)
Net amortised cost after modification	339,010

At 31 December 2021 effect of loans modifications since initial recognition was insignificant.

12 Finance Lease Receivables

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Finance lease receivables	9,212	5,219
Less credit loss allowance	(176)	(111)
Total finance lease receivables	**9,036**	**5,108**

The table below contains an analysis of the credit risk exposure of financial leases at AC. The carrying amount of finance lease receivables at AC at 31 December 2021 below also represents the Group's maximum exposure to credit risk on these assets:

12 Finance lease receivables (continued)

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total
Finance lease receivables				
- Excellent	8,057	-	-	8,057
- Good	255	-	-	255
- Satisfactory	-	257		257
- Special monitoring	-	427	-	427
- Default	-	-	216	216
Gross carrying amount	**8,312**	**684**	**216**	**9,212**
Credit loss allowance	(29)	(21)	(126)	(176)
Carrying amount	**8,283**	**663**	**90**	**9,036**

The table below contains an analysis of the credit risk exposure of financial leases at AC. The carrying amount of finance lease receivables at AC at 31 December 2020 below also represents the Group's maximum exposure to credit risk on these assets:

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total
Finance lease receivables				
- Excellent	-	-	-	-
- Good	2,382	-	-	2,382
- Special monitoring	-	2,515	-	2,515
- Default	-	-	322	322
Gross carrying amount	2,382	2,515	322	5,219
Credit loss allowance	(4)	(19)	(88)	(111)
Carrying amount	**2,378**	**2,496**	**234**	**5,108**

12 Finance Lease Receivable (Continued)

Movements in the credit loss allowance and in the gross amortised cost amount of finance lease receivables were as follows.

	Credit loss allowance				Gross carrying amount			
In thousands of Georgian Lari	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**
Finance lease								
At 31 December, 2020	**(4)**	**(19)**	**(88)**	**(111)**	**2,382**	**2,515**	**322**	**5,219**
Movements with impact on credit loss allowance charge for the period:								
Transfers:								
- to lifetime (from Stage 1 to Stage 2)	1	(1)	-	-	(264)	264	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	50	-	(126)	(76)	(90)	(125)	215	-
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	-	-	-	-	108	(108)	-	-
New originated or purchased	(80)	-	-	(80)	7,619	-	-	7,619
Payments	3	14	88	105	(1,390)	(1,867)	(321)	(3,578)
Other movementsin pd lgd/ead	1	(15)	-	(14)	-	5	-	5
Total movements with impact on credit loss allowance charge for the period	**(25)**	**(2)**	**(38)**	**(65)**	**5,983**	**(1,831)**	**(106)**	**4,046**
FX and other movements	-	-	-	-	(53)	-	-	(53)
At 31 December, 2021	**(29)**	**(21)**	**(126)**	**(176)**	**8,312**	**684**	**216**	**9,212**

12 Finance Lease Receivable (Continued)

In thousands of Georgian Lari	Credit loss allowance				Gross carrying amount			
	Stage 1 (12-months ECL)	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**	**Stage 1 (12-months ECL)**	**Stage 2 (lifetime ECL for SICR)**	**Stage 3 (lifetime ECL for credit im-paired)**	**Total**
Finance lease								
At 31 December, 2019	**(10)**	**(2)**	**-**	**(12)**	**2,865**	**273**	**-**	**3,138**
Movements with impact on credit loss allowance charge for the period:								
Transfers:								
- to lifetime (from Stage 1 to Stage 2)	19	(19)	-	-	(2,434)	2,434	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	88	-	(88)	-	(322)	-	322	-
New originated or purchased	(107)	-	-	(107)	3,551	-	-	3,551
Payments	6	2	-	8	(1,278)	(192)	-	(1,470)
Total movements with impact on credit loss allowance charge for the period	6	(17)	(88)	(99)	(483)	2,242	322	2,081
At 31 December, 2020	**(4)**	**(19)**	**(88)**	**(111)**	**2,382**	**2,515**	**322**	**5,219**

Refer to Note 31 for the ECL measurement approach.

Finance lease payments receivable (gross investment in the leases) and their present values are as follows:

	December 31, 2021	**December 31, 2020**
Present value of lease payments receivable	9,212	5,219
Impairment loss allowance	(176)	(111)
Net investment in the lease	**9,036**	**5,108**
Undiscounted lease payments analysed as:		
Recoverable after 12 months	3,879	3,254
Recoverable within 12 months	5,333	1,965

Finance lease receivables relate to leases of car and equipment. Estimated collateral held as at 31 December 2021 amount to GEL 15,337 thousand (2020: GEL 10,543 thousand).

12 Finance Lease Receivable (Continued)

Estimates of collateral value are based on the value of collateral assessed at the time of lease origination. Risks related to the leased asset such as damage caused by various reasons and theft in majority cases are insured.

The Group's finance lease arrangements do not include variable payments. The average interest rate contracted approximates 22.3 % (2020: 24.6 %) per annum.

There has been no change in the estimation techniques or significant assumptions made during the current reporting period in assessing the loss allowance for finance lease receivables.

13 Insurance assets

In thousands of Georgian Lari	**December 31, 2021**	**December 31, 2020**
Insurance receivables	5,679	2,848
Reinsurance assets	6,138	2,998
Total insurance contracts	**11,817**	**5,846**

Insurance assets comprised of the following:

In thousands of Georgian Lari	**December 31, 2021**	**December 31, 2020**
Unearned Reinsurance Premium	5,312	2,523
Reinsurers' share of provisions	615	281
Reinsurance receivable net	211	194
Premiums receivable net	5,679	2,848
Total insurance assets	**11,817**	**5,846**

14 Other Assets

In thousands of Georgian Lari	**December 31, 2021**	**December 31, 2020**
Repossessed collateral	27,818	34,482
Input and withholding taxes	1,416	1,166
Prepayments for services	852	1,029
Litigation prepayments	414	568
Other	1,510	3,741
Total other assets	**32,010**	**40,986**

Repossessed collateral represents real estate assets acquired by the Group in settlement of overdue loans. The Group expects to dispose of the assets in the future. The Bank initiates special offers and marketing actions to sell collateral, including brokers' services and advertising on locations (such as lands, offices, etc.)

As of 31 December 2021 the value of repossessed collateral attributable to the bank was GEL 25,906 thousand (2020: GEL 32,719). Information on related party balances is disclosed in Note 36.

15 Premises, Equipment and Intangible Assets

In thousands of Georgian Lari	Note	Premises	Office and computer Equipment	Total premises and equipment	Computer software licences	Total
Cost or valuation at 31 December 2019		21,680	15,673	37,353	3,451	40,804
Accumulated depreciation		(433)	(9,904)	(10,337)	(1,253)	(11,590)
Carrying amount at 31 December 2019		**21,247**	**5,769**	**27,016**	**2,198**	**29,214**
Additions		-	989	989	2,252	3,241
Transfers		820	-	820	-	820
Disposals			(915)	(915)	(228)	(1,143)
Revaluation		838	-	838	-	838
Depreciation						
Depreciation charge	28	(456)	(1,651)	(2,107)	(478)	(2,585)
Disposals		-	869	869	165	1,034
Carrying amount at 31 December 2020		**22,449**	**5,061**	**27,510**	**3,909**	**31,419**
Cost or valuation at 31 December 2020		23,338	15,747	39,085	5,475	44,560
Accumulated depreciation		(889)	(10,686)	(11,575)	(1,566)	(13,141)
Carrying amount at 31 December 2020		**22,449**	**5,061**	**27,510**	**3,909**	**31,419**
Additions		31	1,385	1,416	4,527	5,943
Disposals					(321)	(321)
Depreciation upon revaluation		(1,298)	-	(1,298)	-	(1,298)
Revaluation		4,423		4,423		4,423
Depreciation						
Depreciation charge	28	(431)	(1,680)	(2,111)	(1,352)	(3,463)
Reversals of accumulated depreciation		23	-	23	-	23
Depreciation upon revaluation		1,298	-	1,298	-	1,298
Disposals			10	10	321	331
Carrying amount at 31 December 2021		**26,495**	**4,776**	**31,271**	**7,084**	**38,355**
Cost or valuation at 31 December 2021		26,494	17,132	43,626	9,681	53,307
Accumulated depreciation			(12,355)	(12,355)	(2,597)	(14,952)
Carrying amount at 31 December 2021		**26,494**	**4,777**	**31,271**	**7,084**	**38,355**

Premises have been revalued at fair value in December 2021 by an independent firm of valuers. As at the reporting date the Group has accouned its premises and impact of changes in market prices on valuation of properties

The input to which the fair value estimate for premises is most sensitive is price per square meter: the higher the price per square meter, the higher the fair value.

At 31 December 2021, the carrying amount of premises would have been GEL 12,341 thousand (2020: GEL 12,620 thousand) had the assets been carried at cost the cost model.

15 Premises, Equipment and intaginble Assets (continued)

The amount reconciles to the carrying value of the premises as follows:

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Premises at revalued amount in the statement of financial position	26,494	22,448
Revaluation reserve presented in equity, net of tax	(14,426)	(10,003)
Difference between accumulated depreciation based on cost and based on revalued amount not yet transferred to retained earnings	1,930	1,821
Premises at cost less accumulated depreciation	**13,998**	**14,266**

As at December 31, 2021 and 2020 included in property and equipment were fully depreciated assets amounting GEL 7,803 thousand and GEL 7,441 thousand, respectively.

16 Right-of-use Assets and Lease Liabilities

The Group leases various offices. Rental contracts are typically made for fixed periods from 1 to 10 years, but may have extension options as described below.

Until 31 December 2018 leases of premises and equipment were classified as either finance leases or operating leases. From 1 January 2019, leases are recognised as a right-of-use asset and a corresponding liability from the date when the leased asset becomes available for use by the Group.

The right of use assets by class of underlying items is analysed as follows:

In thousands of Georgian Lari	Premises
Carrying amount at 1 January 2020	**3,536**
Additions	1,707
Disposals	(25)
Depreciation charge	(1,065)
Carrying amount at 31 December 2020	**4,153**
Additions	555
Modification Effect	793
Depreciation charge	(1,131)
Carrying amount at 31 December 2021	**4,370**

16 Right of Use Assets and Lease Liabilities (Continued)

The movement in lease liabilities are analysed as follows:

In thousands or Georgian Lari	2021	2020
Lease liability as at 1 January	**4,812**	**3,737**
Recognition of lease liabilities	555	1,707
Interest expense on lease liabilities	287	248
Foreign exchange effect	(251)	508
Modifications	757	5
Repayment of interest expense	(287)	(248)
Repayment of lease liabilities	(1,128)	(1,145)
Lease liability as at 31 December	**4,745**	**4,812**

Amounts recognised in statement of profit and loss:

In thousands or Georgian Lari	December 31, 2021	December 31, 2020
Depreciation expense on right-of-use assets	1,131	1,066
Interest expense on lease liabilities	287	248
Expenses recognized in profit or loss statement related to low-value asset leases	25	21
Expenses recognized in profit or loss statement related short-term leases	137	134
Total	**1,580**	**1,469**

Extension and termination options are included in a number of property and equipment leases across the Group. These are used to maximise operational flexibility in terms of managing the assets used in the Group's operations. The majority of extension and termination options held are exercisable only by the Group and not by the respective lessor.

The lease term is reassessed if an option is actually exercised (or not exercised) or the Group becomes obliged to exercise (or not exercise) it. The assessment of reasonable certainty is only revised if a significant event or a significant change in circumstances occurs, which affects this assessment, and that is within the control of the lessee.

17 Due to Other Banks

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Correspondent accounts and overnight placements of other banks	1	1
Short-term placements of other banks	19,707	40,233
Short-term placements from NBG	203,123	263,929
Total due to other banks	**222,831**	**304,163**

17 Due to Other Banks (continued)

The Group pledged debt securities as collateral with carrying amount of GEL 122,001 thousand, mortgage loans with nominal amount of GEL 62,395 thousand and SME loans with nominal amount of GEL 39,306 thousand for short term loan with NBG at the end of reporting period (2020: debt securities GEL 215,203 thousand, mortgage loans GEL 64,390 thousand and SME loans GEL 19,017 thousand pledged for short-term loans with NBG). Refer to Note 33.

Refer to Note 35 for the disclosure of the fair value of each class of amounts due to other banks. Interest rate analysis of due to other banks is disclosed in Note 31. Information on related party balances is disclosed in Note 36.

18 Customer Accounts

In thousands of Georgian Lari	**December 31, 2021**	**December 31, 2020**
State and public organisations		
- Current/settlement accounts	53,542	135,576
- Term deposits	91,963	96,406
Other legal entities		
- Current/settlement accounts	245,970	213,718
- Term deposits	88,987	137,249
Individuals		
- Current/demand accounts	172,501	139,447
- Term deposits	227,216	216,319
Total customer accounts	**880,179**	**938,715**

State and public organisations exclude government-owned profit orientated businesses. The customer accounts balances under the bank's separate statement as at 31 December 2021 amount to GEL 881,805 thousand (2020: GEL 940,377 thousand)

Economic sector concentrations within customer accounts are as follows:

	December 31, 2021		**December 31, 2020**	
In thousands of Georgian Lari	**Amount**	**%**	**Amount**	**%**
Individuals	399,717	45%	355,765	38%
Financial Institutions	147,556	17%	184,037	20%
State controlled enterprises	63,186	7%	90,018	10%
Service	55,931	6%	57,909	6%
Transportation or Communication	41,290	5%	49,723	5%
Trade	40,292	5%	40,737	4%
Production/Manufacturing	40,282	5%	40,698	4%
Education	32,795	4%	36,561	4%
Construction & Production of Construction Materials	31,782	4%	35,590	4%
Other	27,348	2%	47,677	5%
Total customer accounts	**880,179**	**100%**	**938,715**	**100%**

18 Customer Accounts (continued)

At 31 December 2021, the Group had one customer (2020: three customers) with balances above 10% of total equity. The aggregate balance of this customer was GEL 69,813.95 thousand (2020: GEL 178,834 thousand) or 7.9% (2020: 19.1%) of total customer accounts.

Refer to Note 35 for disclosure of the fair value of each class of customer accounts. Interest rate analysis of customer accounts is disclosed in Note 31. Information on related party balances is disclosed in Note 36.

19 Borrowed Funds

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Borrowed funds		
Loans from European Bank for Reconstruction and Development ("EBRD")	96,447	95,382
Loans from GLOBAL CLIMATE PARTNERSHIP FUND	89,678	50,179
Loans from Blue Orchard	53,407	33,848
Loans from The OPEC Fund for International Development (OFID)	46,999	49,648
Loans from THE EUROPEAN FUND FOR SOUTHEAST EUROPE	42,728	49,327
Loans from Black Sea Trade and Development Bank ("BSTDB")	40,512	81,362
Loans from GREEN FOR GROWTH FUND	19,369	24,190
Loans from China Development Bank ("CDB")	15,556	16,405
Loans from Commerzbank	15,489	16,122
Loans from BANCA POPOLARE DI SONDRIO SCPA	9,305	18,715
Loans from International Finance Corporation ("IFC")	-	32,817
Loans from Asian Development Bank ("ADB")	-	9,017
Total borrowed funds	**429,490**	**477,012**

The Group is obligated to comply with financial covenants in relation to its borrowings. The Group has not breached any of these covenants set by the lenders under loan agreements as at 31 December, 2021. Information on compliance with covenants is disclosed in Note 33.

Refer to Note 35 for disclosure of the fair value of each class of borrowed funds. Interest rate analysis of borrowed funds is disclosed in Note 31. Information on related party balances is disclosed in Note 36, the movements in the Group's liabilities from financing activities is disclosed.

20 Insurance Liabilities

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Unearned premium and claims provisions	6,913	3,646
Other insurance liabilities	4,646	2,473
Total insurance liabilities	**11,559**	**6,119**

Unearned premium and claims provisions containamount for provisions incurred but not reported GEL 13 thousand (2020: GEL 6 thousand).

20 Insurance Liabilities (continued)

The movement during the year in insurance contract liabilities is as follows:

In thousands of Georgian Lari	**December 31, 2021**	**December 31, 2020**
Unearned premium and claims provisions as at 1 January	**3,646**	**4,425**
Gross premium during the year	13,384	7,428
Premiums earned during the year	(10,577)	(8,419)
Claims Paid	(2,402)	(2,380)
Claims Incurred	2,862	2,592
Unearned premium and claims provisions as at 31 December	**6,913**	**3,646**

The movements on claims reserves for the years ended 31 December 2021 and 2020 were as follows:

In thousands of Georgian Lari	**December 31, 2021**	**December 31, 2020**
Reserves for claims, beginning of the year	454	242
Reserves for claims, reinsurance share, beginning of the year	(281)	(163)
Net reserves for claims, beginning of the year	**173**	**79**
Plus claims incurred	1,002	699
Less claims paid	(876)	(605)
Net reserves for claims, end of the year	**299**	**173**
Reserves for claims, reinsurance share, end of the year	**614**	**281**
Reserves for claims, end of the year	**913**	**454**

20 Insurance Liabilities (continued)

The movements on unearned insurance premium reserve for the years ended 31 December 2021 and 2020 were as follows:

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Gross unearned insurance premium reserve, beginning of the year	3,192	4,183
Unearned insurance premium reserve, reinsurance share, beginning of the year	(2,523)	(3,352)
Net unearned insurance premium reserve, beginning of the year	669	831
Change in unearned insurance premium reserve	2,806	(991)
Change in unearned insurance premium reserve, reinsurance share	(2,789)	829
Net change in unearned insurance premium reserve	17	(162)
Net unearned insurance premium reserve, end of the year	687	669
Unearned insurance premium reserve, reinsurance share, end of the year	5,312	2,523
Gross unearned insurance premium reserve, end of the year	**5,999**	**3,192**

Risks under policies usually cover twelve months duration. For insurance contracts, claims provisions (comprising provisions for claims reported by policyholders and claims incurred but not yet reported) are established to cover the ultimate cost of settling the liabilities in respect of claims that have occurred and are estimated based on known facts at the reporting date.

The provisions are refined monthly as part of a regular ongoing process as claims experience develops, certain claims are settled and further claims are reported. Outstanding claims provisions are not discounted for the time value of money.

The Group reviews its unexpired risk based on historical performance of separate business lines to determine overall change in expected claims

Refer to Note 35 for disclosure of the fair value of each class of Insurance liabilities.

21 Other Financial Liabilities

Other financial liabilities comprise the following:

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Other financial liabilities at AC		
Payables for services	1,527	2,384
Debit and credit card payables	414	1,277
Settlement Operations	158	1,985
Other accrued liabilities	1,032	656
Total other financial liabilities	**3,131**	**6,302**

The financial liability on settlement operations represents the amounts for which the Bank's customers initiated transfer from their customer accounts to other commercial banks and which have not been settled at the end of the period. These amounts have been deducted from the customer accounts and included in other financial liabilities.

Refer to Note 35 for disclosure of the fair value of each class of other financial liabilities.

22 Other Liabilities

Other liabilities comprise the following:

In thousands of Georgian Lari	December 31, 2021	December 31, 2020
Accrued employee benefit costs	3,171	625
Prepayments received	760	966
Taxes payable other than on income	514	279
Other	1,255	826
Total other liabilities	**5,700**	**2,696**

Accrued employee benefits include the provisions created for staff and management benefits, including provisions created under share based payment ("SBP") arrangements. In 2020 all payments and accruals under SBP were halted temporarily due to the restrictions imposed by the regulator. Refer to Note 25.

23 Subordinated Debt

Subordinated debt of GEL 15,562 thousand (2020: GEL 16,368 thousand) carries a fixed interest rate of 7% p.a. and matures on August 26th, 2026. The debt ranks after all other creditors in the case of liquidation. The loan was originally recognised and subsequently carried on the statement of financial position at amortised cost.

Refer to Note 35 for the disclosure of the fair value of subordinated debt. Interest rate analysis of subordinated debt is disclosed in Note 31. the movements in the subordinated debt is disclosed in Note 30 Information on related party balances is disclosed in Note 36.

24 Share Capital

In thousands of Georgian Lari except for number of shares	Number of outstanding shares in thousands	Ordinary shares	Share premium	Total
At 1 January 2020	**16,057**	**16,057**	**74,923**	**90,980**
At 31 December 2020	**16,057**	**16,057**	**74,923**	**90,980**
At 31 December 2021	**16,057**	**16,057**	**74,923**	**90,980**

The total authorised number of ordinary shares is 16,181 thousand shares (2020: 16,181 thousand shares), with a par value of GEL 1 per share (2020: GEL 1 per share). The number of ordinary issued shares is 16,181 thousand (2020: 16,181 thousand shares). All issued ordinary shares are fully paid. Each ordinary share carries one voting right.

The table above does not include 124 thousand (2020: 124 thousand) of granted and issued shares to management which are not yet vested. Each ordinary share carries one voting right.

Share premium represents the excess of contributions received over the nominal value of shares issued.
In accordance with Georgian legislation, the Bank distributes profits as dividends or transfers them to reserves on the basis of financial statements prepared in accordance with Georgian Accounting Rules.

The Banks unaudited undistributed reserves under Law of Georgia on Accounting and Financial Audit as at 31 December 2021 amount to GEL 145,644 thousand (2019: GEL 138,460 thousand).

25 Share-based Payments

In April 2015, the Supervisory Board of the Bank approved a Senior Management Bonus new scheme for the years 2015 – 2016 and granted new shares to the members of senior management of the Bank subject to service conditions. These shares are eligible to dividends but do not have voting rights and cannot be sold or transferred to third parties before the service conditions are met.

According to the scheme, each year, subject to predefined performance conditions, certain number of the shares is awarded to the participants. The total number of the shares to be awarded depends on meeting team goals and the book value per share according to the audited IFRS financial statements of the Group for the year preceding the date of the award. The team goals primarily relate to achieving growth and profitability metrics set by the Supervisory Board as well as compliance with certain regulatory ratios and covenants. The awarded shares carry service conditions and before those conditions are met, the shares are eligible to dividends but do not have voting rights and cannot be sold or transferred to third parties. Service conditions assume continuous employment until the gradual transfer of the full title to the scheme participants is complete.

These shares are subject to post-vesting restrictions, July 2019 (the end of first lock-up period) will remove restrictions on 50% of vested shares and 1 July 2022 (the end of second lock-up period) is when the post-vesting restrictions expire entirely.

In March 2017, the Supervisory Board of the Bank approved a Senior Management Bonus new scheme for the years 2017 – 2021 and granted new shares to the members of senior management of the Bank subject to service conditions. The Group considers 27 March 2017 as the grant date. The fair value per share at the grant date was estimated at GEL 12.55 per share. The fair value of the shares was determined by reference to the price per share established for the share purchase transaction between the owners of the Bank.

25 Shared base Payments (Continued)

According to the new share based scheme the Management Shares will be subject to the similar restrictions and cannot be sold by the Directors within 2 (two) years after the acquisition ("the Lock-up Period"). After the Lock-up Period, half of the Management Shares owned by the Directors can be sold. All of the Management Shares owned by the Directors can be transferred only after the Directors' resignation.

The total expense on the scheme in 2021 amounted to GEL 597 thousand (2020: GEL 20 thousand) recognizing liabilities on SBP scheme due for 2017-2019 years. In 2020 due to the constrains imposed by the regulator for accruals to the provisions were temporarily halted and not provided in year 2020 charges. Refer to Note 32. Tabular information on the scheme is given below:

In thousands of Georgian Lari except for number of shares	2021	2020
Number of unvested shares at the beginning of the year	**178,000**	**220,000**
Number of granted shares	-	-
Change in estimate of number of shares expected to vest based on performance conditions	(13,000)	(42,000)
Number of unvested shares at the end of the year	**165,000**	**178,000**
Value at grant date per share (in GEL)	12.55	12.55
Expense on equity-settled part	597	20
Expense recognized as staff cost during the year	**597**	**20**

Staff costs related to equity settled part of the share based payment schemes are recognised in the income statement on a straight line basis over the vesting period and corresponding entry is credited to share based payment reserve in equity. The share based payment reserve included in equity amounted to GEL 2,440 as at 31 December 2021 (GEL 1,842 as at 31 December 2020).

26 Interest Income and Expense

In thousands of Georgian Lari	2021	2020
Interest income calculated using the effective interest method		
Loans and advances to customers at AC	113,079	102,177
Debt securities at AC	15,789	16,953
Debt securities at FVOCI	2,732	864
Due from other banks at AC	2,190	3,087
Total interest income calculated using the effective interest method	**133,790**	**123,081**
Interest expense on financial liabilities at AC calculated using the effective interest method		
Borrowed funds	22,813	26,712
Term deposits of individuals	11,672	12,492
Term deposits of legal entities	11,468	9,275
Due to other Banks	9,902	9,363
Current/settlement accounts	8,020	6,979
Subordinated loans	1,120	1,086
Term placements of other banks	877	866
Total interest expense calculated using the effective interest method	**65,872**	**66,773**
Losses from modification of financial assets	**-**	**1,914**
Net interest income	**67,918**	**54,394**

27 Fee and Commission Income and Expense

In thousands of Georgian Lari	2021	2020
Fee and commission income		
Fee and commission income not relating to financial instruments at FVTPL:		
- Plastic card fees	2,352	1,915
- Financial guarantees issued (Note 33)	2,337	2,532
- Settlement transactions	1,653	1,476
- Cash transactions	476	365
- Distant banking fees	417	123
- Performance guarantees issued (Note 33)	149	247
- Other	1,218	527
Total fee and commission income	**8,602**	**7,185**
Fee and commission expense		
Fee and commission expense not relating to financial instruments at FVTPL		
- Plastic card fees	2,674	2,205
- Settlement transactions	653	589
- Expenses Related to Guarantees	180	97
- Commissions for credit lines	142	-
- Cash Collection & Transaction fees	42	128
- Factoring services	6	6
- Other	196	140
Total fee and commission expense	**3,893**	**3,165**
Net fee and commission income	**4,709**	**4,020**

28 Administrative and Other Operating Expenses

In thousands of Georgian Lari	Note	2021	2020
Employee compensation		24,120	17,991
Depreciation of premises and equipment		3,461	2,585
Communications and information services		2,138	1,489
Advertising and marketing		1,979	1,346
Impairment of litigation prepayments and other financial assets		1,474	66
Professional services		1,454	1,869
Depreciation of right of use assets		1,132	1,065
Security services		803	808
Repairs and maintenance		739	961
Taxes other than on income		644	696
Insurance		628	423
Low-value assets lease expense		287	248
Office supplies		279	175
Operating lease expense		162	155
Travel and Training		50	48
Other		1,810	1,272
Total administrative and other operating expenses		**41,160**	**31,197**

Included in staff costs are statutory pension contributions of GEL 309 thousand (2020: 268 thousand).

28 Administrative and Other Operating Expenses (Continued)

The table below discloses the information on the Management Board members including Supervisory Board and employees for respective periods:

	2021		2020	
	Bank separate	**Consolidated**	**Bank separate**	**Consolidated**
Supervisory Board members	5	5	5	5
Management Board members	7	12	7	11
Middle management staff	34	40	30	36
Other employees	445	478	391	418
Temporary employed			-	-
Number of employees	**491**	**535**	**433**	**470**

The average number of employees of the Group during 2021 is 500 (2020: 507).

Included in staff costs is the amount of GEL 597 thousand (2020: GEL 20 thousand), which represents share-based remuneration provided to the Group’s personnel directly by shareholders.

As at 31 December 2021 the professional service fees include GEL 340 thousand fees incurred for audit and other professional services provided by Auditor/Audit Firm as defined in the Law of Georgia on Accounting, Reporting and Auditing (2020: GEL 400 thousand). The fees related to the Bank as at 31 December 2021 amount GEL 208 thousand, (2020: GEL 259 thousand).

29 Income Taxes

(a) Components of income tax expense

Income tax expense recorded in profit or loss for the year comprises the following:

In thousands of Georgian Lari	**2021**	**2020**
Current tax	(3,450)	(245)
Deferred tax	2,400	(1,221)
Income tax expense for the year	**(1,050)**	**(1,466)**

29 Income Taxes (continued)

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

The income tax rate applicable to the majority of the Group's 2021 income is 15% (2020: 15%). The income tax rate applicable to the majority of income of subsidiaries is 15% (2020: 15%). A reconciliation between the expected and the actual taxation charge is provided below.

In thousands of Georgian Lari	2021	2020
Profit before tax	**39,631**	**25,687**
Theoretical tax charge at statutory rate (2021: 15%; 2019: 15%)	(5,945)	(3,853)
Tax effect of items which are not deductible or assessable for taxation purposes:		
- Income from Government /NBG's securities and deposits	2,671	2,612
- Other income which is exempt from taxation	420	148
- Income items not recognized in P&L, but taxable from taxation viewpoint	(53)	(71)
- Other non-deductible expenses	(7)	(25)
Tax loss not carried forward	1,106	(1,106)
Effect of change in tax legislation	758	829
Income tax expense for the year	**(1,050)**	**(1,466)**

On 13 May 2016 the Government of Georgia enacted the changes in the Tax Code of Georgia for commercial banks, insurance organizations abolishing income tax attributable on the period profit (before distribution in a form of dividend or other forms of profit distributions) starting from 1 January 2019.

On 30 May 2018 the Georgian Government has announced postponement of these changes until 1 January 2023. As of 31 December 2018, deferred tax assets/liabilities are re-measured to the amounts that are estimated to be utilized in the period from 1 January 2019 to 31 December 2022.

(c) Deferred taxes analysed by type of temporary difference

Differences between IFRS and statutory taxation regulations in Georgia give rise to temporary differences between the carrying amount of assets and liabilities for financial reporting purposes and their tax bases. The tax effect of the movements in these temporary differences as at 31 December 2021 is detailed below.

In thousands of Georgian Lari	1 January 2021	Credited/ (charged) to profit or loss	Credited/ (charged) directly to equity	31 December 2021
Tax effect of deductible/(taxable) temporary differences				
Premises and equipment	(607)	279	-	(328)
Credit loss allowance of loans	(3,061)	1,685	-	(1,376)
Right of use assets	140	(44)	-	96
Guarantees provision	(118)	(161)	-	(279)
Interbank provision	87	5	-	92
Reversal of securities provision	24	14	-	38
Borrowings	(308)	8	-	(300)
Accruals	142	591	-	733
Other	534	31	-	565
Share Based Payment	92	(8)	-	84
Net deferred tax liability	**(3,075)**	**2,400**	**-**	**(675)**

29 Income Taxes (continued)

The tax effect of the movements in these temporary differences as at 31 December 2020 is detailed below.

In thousands of Georgian Lari	1 January 2020	Credited/ (charged) to profit or loss	Credited/ (charged) directly to equity	31 December 2020
Tax effect of deductible/(taxable) temporary differences				
Premises and equipment	(1,138)	531	-	(607)
Credit loss allowance of loans	(1,303)	(1,758)	-	(3,061)
Right of use assets	131	9	-	140
Guarantees provision	(227)	109	-	(118)
Interbank provision	47	40	-	87
Reversal of securities provision	42	(18)	-	24
Borrowings	(407)	99	-	(308)
Accruals	330	(188)	-	142
Other	581	(47)	-	534
Share Based Payment	89	3	-	92
Net deferred tax liability	**(1,855)**	**(1,220)**	-	**(3,075)**

In the context of the Group's current structure and Georgian tax legislation, tax losses and current tax assets of different group companies may not be offset against current tax liabilities and taxable profits of other group companies and, accordingly, taxes may accrue even where there is a consolidated tax loss. Therefore, deferred tax assets and liabilities are offset only when they relate to the same taxable entity and the same taxation authority.

30 Reconciliation of Liabilities Arising from Financing Activities

The table below sets out movements in the Group's liabilities from financing activities for each of the periods presented. The items of these liabilities are those that are reported as financing activities in the statement of cash flows.

	Liabilities from financing activities			
In thousands or Georgian Lari	Borrowed funds	Subordinated debt	Lease liabilities	Total
Liabilities from financing activities at 1 January 2020	**428,926**	**14,409**	**3,737**	**447,072**
Cash inflow	253,972	-	-	253,972
Cash flows	(294,271)	(1,221)	(1,394)	(296,886)
Foreign exchange adjustments	61,991	2,094	508	64,592
Interest accrued	26,395	1,086	1,961	29,442
Liabilities from financing activities at 31 December 2020	**477,012**	**16,368**	**4,812**	**498,192**
Cash inflow	218,271	-	-	218,271
Cash flows	(257,519)	(998)	(1,414)	(259,931)
Foreign exchange adjustments	(28,882)	(928)	251	(29,559)
Interest accrued	20,607	1,120	1,096	22,823
Liabilities from financing activities at 31 December 2021	**429,489**	**15,562**	**4,745**	**449,796**

31 Financial Risk Management

The risk management function within the Group is carried out in respect of financial risks, operational risks and legal risks. The Group manages the identification, assessment and mitigation of risks through an internal governance process, the risk management tools and processes to mitigate the impact of these risks on the Group's financial results, its long term strategic goals and reputation.

Responsibility for risk management resides at all levels within the Group, from the Supervisory Board and Management Board (The Executive Management) level down through to each business unit manager and risk officer. The risk management function is split between risk management units:

- On the Supervisory Board level - the Board committees: Risk Committee and Audit Committee,
- On the Management Board level – the Management Board level committees and units: Assets and Liabilities Management Committee ("ALCO"), Risk Management department, Treasury department, and Credit Committees.

The Supervisory Board has overall responsibility for the oversight of the risk management framework. As a top governing body of the Bank, the Supervisory Board sets the general approach and principles for risk management by assessing the Bank's risk profile and the adequacy and effectiveness of the Bank's risk management framework, approving individual risk strategies, setting risk appetite and the risk control framework.

The Risk Management policies approved by the Supervisory Board of the Bank cover main type of risks, assign responsibility to the management for specific risks, set the requirements for internal control frameworks. The risk management policies aim to identify, analyse and manage the risks faced by the Group, to set appropriate risk limits and controls, and to continuously monitor risk levels and adherence to limits. Risk management policies and procedures are reviewed regularly to reflect changes in market conditions, products and services offered and emerging best practice.

The Management Board defines appropriate procedures for managing all inherent risks in each business line, with the role of structuring business to reflect risk, ensuring adequate segregation of duties and adequate procedures in place, defining operational responsibilities of subordinate staff. The Management Board is responsible for monitoring and implementation of risk mitigation measures and ensuring that the Group operates within the established risk parameters.

Financial risk comprises market risk (including currency risk, interest rate risk and other price risk), credit risk and liquidity risk. The primary objectives of the financial risk management function are to establish risk limits, and then ensure that exposure to risks stays within these limits. The operational and legal risk management functions are intended to ensure proper functioning of internal policies and procedures, in order to minimise operational and legal risks.

Credit risk, both at portfolio and transactional levels, is managed by a system of Credit Committees; to facilitate efficient decision-making, the Group establishes a hierarchy of credit committees depending on the type and amount of the exposure.

Market and liquidity risks are managed by the Asset and Liability Management Committee in coordination with the Treasury Department and the Risk Management department. The Treasury Department monitors financial and non-financial risks by holding regular meetings with operational units in order to obtain expert judgments in their areas of expertise, executes the daily control of liquidity gaps, structural interest rate exposures, and controls and manages foreign exchange risk exposure.

31 Financial Risk Management (Continued)

The Bank sets principles about risk taking and risk management which are reflected in the internal rules and policies, and applied consistently throughout the organisation. These general principles are the following: 33

- prudent risk-taking with comprehensive risk assessment and control environment;
- adequate and effective monitoring and reporting system;
- proper quantification of risks using proper methodologies in line with the size and complexity of the Bank;
- adopting and fulfilment of all the regulatory requirements and guidelines available and using best practices via using international standards;
- operating effective risk governance by maintaining proper risk control hierarchy, independent from business activities in order to avoid conflict of interest;
- the observation of risk management considerations upon the launch of new activities, business lines or products.

Both external and internal risk factors are identified and managed throughout the Group's organisational structure. Particular emphasis is placed on developing risk maps that are used to identify a wide range of risk factors and serve as a basis for determining the level of comfort over the current risk mitigation procedures.

Credit risk. The Group exposes itself to credit risk, which is the risk that one party to a financial instrument will cause a financial loss for the other party by failing to meet an obligation.

Exposure to credit risk arises as a result of the Group's lending and other transactions with counterparties, giving rise to financial assets and off-balance sheet credit-related commitments.

The Group's maximum exposure to credit risk is reflected in the carrying amounts of financial assets in the consolidated statement of financial position. For financial guarantees issued, commitments to extend credit, undrawn credit lines and export/import letters of credit, the maximum exposure to credit risk is the amount of the commitment.

Credit risk management. Credit risk is the single largest risk for the Group's business; management therefore carefully manages its exposure to credit risk.

The estimation of credit risk for risk management purposes is complex and involves the use of models, as the risk varies depending on market conditions, expected cash flows and the passage of time. The assessment of credit risk for a portfolio of assets entails further estimations of the likelihood of defaults occurring, the associated loss ratios and default correlations between counterparties.

Limits. The Group structures the levels of credit risk it undertakes by placing limits on the amount of risk accepted in relation to one borrower, or groups of borrowers, and to geographical and industry segments. Limits on the level of credit risk by product and industry sector are approved regularly by management. Such risks are monitored on a revolving basis and are subject to an annual, or more frequent, review.

The Group established a number of credit committees that are responsible for approving credit limits for individual borrowers. Senior level credit is a supreme decision making body responsible for high value transactions. The Committee is also responsible for issuing guidance and manuals to lower level credit committees.

31 Financial Risk Management (Continued)

The credit approval limits between committees are segregated as follows:
For retail segment lending

- The senior credit committee reviews and approves limits above GEL 600 thousand;
- The junior credit committees review and approve credit limits between GEL 300-600 thousand;
- Applications up to GEL 300 thousand are approved by risk management department. Exceptions are retail loans up to GEL 100 thousand are approved by retail lending group.

For business segment lending

- The senior credit committee reviews and approves limits above USD 600 thousand;
- The junior credit committees review and approve credit limits between USD 300-600 thousand and meet weekly;
- Applications up to USD 300 thousand are approved by risk management department.

Loan applications originating with the relevant client relationship managers are passed on to the relevant credit committee for the approval of the credit limit. Exposure to credit risk is also managed, in part, by obtaining collateral as well as corporate and personal guarantees. In order to monitor exposure to credit risk, regular reports are produced by the Financial Reporting and Risk departments based on a structured analysis focusing on the customer's business and financial performance. Any significant interaction with customers with deteriorating creditworthiness are reported to and reviewed by the Management Board and the Risk Committee.

Credit risk grading system. For measuring credit risk and grading financial instruments by the amount of credit risk, the Group applies an Internal Rating System for legal entities or risk grades estimated by external international rating agencies (Standard & Poor's - "S&P", Fitch, Moody's) for Interbank exposures, Securities and other financial assets, when applicable.

Internal and external credit ratings are mapped on an internally defined master scale with a specified range of probabilities of default as disclosed in the table below:

Master scale credit risk grade	Corporate internal ratings	Corresponding ratings of external international rating agencies (Fitch)	Corresponding PD interval of international rating agencies(Fitch)
Excellent	1 – 2	AAA to BB+	0,01% - 0,28%
Good	3 – 4	BB to B+	0,29% -1.41%
Satisfactory	5 – 6	B, B-	1,42% - 3,20%
Special monitoring	7 – 8	CCC+ to CC-	3.21% - 99,9%
Default	9	C, D-I, D-II	100%

Each master scale credit risk grade is assigned a specific degree of creditworthiness:

- Excellent – strong credit quality with low expected credit risk;
- Good – adequate credit quality with a moderate credit risk;
- Satisfactory – moderate credit quality with a satisfactory credit risk;
- Special monitoring – facilities that require closer monitoring and remedial management; and
- Default – facilities in which a default has occurred.

31 Financial Risk Management (Continued)

The approach used by the Group for measuring credit risk associated with legal entities, is an Expert Judgement-based model designed internally, which assigns credit ratings to the borrower based on the different qualitative and quantitative factors. Ratings are estimated by credit risk officers and are reviewed by the members of the credit risk committees during the credit approval process.

Exposures without assigned internal rating are classified according to credit risk, using different quantitative and qualitative criteria: days in overdue, restructuring, existence of collaterals.

Credit Risk Grade	Credit Quality criteria
Excellent	Not overdue; fully covered with deposit, precious metal or government guarantee
Good	Not more than 31 days past due during last 12 months and collateral (deposit or real estate) fully covers the loan
Satisfactory	Not more than 31-60 days past due during last 12 months, or if loan was restructured, the event happened more than one year ago and current overdue is less than 31 days past due
Special monitoring	Not more than 61-90 days past due during last 12 months , or if the loan was restructured, the event happened more than one year ago and current overdue is 31-90 days past due
Default	Loan was restructured in last 12 months or minimum overdue in last 12 months is 90 days past due

External ratings are assigned to counterparties by independent international rating agencies, such as S&P, Moody's and Fitch. These ratings are publicly available. Such ratings and the corresponding range of probabilities of default ("PD") are applied for the following financial instruments: interbank placements, loans to sovereigns and sub-sovereigns, and investments in debt securities (government, corporate, municipal bonds, Eurobonds and promissory notes purchased).

***Expected credit loss (ECL) measurement*.** ECL is a probability-weighted estimate of the present value of future cash shortfalls (i.e., the weighted average of credit losses, with the respective risks of default occurring in a given time period used as weights). An ECL measurement is unbiased and is determined by evaluating a range of possible outcomes. ECL measurement is based on four components used by the Group: Probability of Default ("PD"), Exposure at Default ("EAD"), Loss Given Default ("LGD") and Discount Rate.

EAD is an estimate of exposure at a future default date, taking into account expected changes in the exposure after the reporting period, including repayments of principal and interest, and expected drawdowns on committed facilities. The EAD on credit related commitments is estimated using Credit Conversion Factor ("CCF"). CCF is a coefficient that shows the probability of conversion of the committed amounts to an on-balance sheet exposure within a defined period. Due to data limitation CCF is assumed to be 100%. PD is an estimate of the likelihood of default to occur over a given time period. LGD is an estimate of the loss arising on default. It is based on the difference between the contractual cash flows due and those that the lender would expect to receive, including from any collateral. It is usually expressed as a percentage of the EAD. The expected losses are discounted to present value at the end of the reporting period. The discount rate represents the effective interest rate ("EIR") for the financial instrument or an approximation thereof.

Expected credit losses are modelled over instrument's *lifetime period.* The *lifetime period* is equal to the remaining contractual period to maturity of debt instruments, adjusted for expected prepayments, if any. For loan commitments and financial guarantee contracts, it is the contractual period over which an entity has a present contractual obligation to extend credit. As a matter of exception from determining the lifetime exposure based on contractual maturity, the Group uses simplified assumptions for credit cards issued to individuals. As a matter of exception from determining the lifetime exposure based on contractual maturity, the Group uses simplified assumptions for credit cards issued to individuals. 5 years (maximum allowed maturity for unsecured consumer credits) is applied as maximum lifetime these instruments and ECL is always measured at lifetime expected losses.

31 Financial Risk Management (Continued)

Management models *Lifetime ECL,* that is, losses that result from all possible default events over the remaining lifetime period of the financial instrument. The *12-month ECL,* represents a portion of lifetime ECLs that result from default events on a financial instrument that are possible within 12 months after the reporting period, or remaining *lifetime period* of the financial instrument if it is less than a year.

The ECLs that are estimated by management for the purposes of these financial statements are point-in-time estimates, rather than through-the-cycle estimates that are commonly used for regulatory purposes. The estimates consider *forward looking information,* that is, ECLs reflect probability weighted development of key macroeconomic variables that have an impact on credit risk.

For purposes of measuring PD, the Group defines default as a situation when the exposure meets one or more of the following criteria:

- 90 days past due (DPD);
- Distressed restructuring (i.e. exposure is defaulted);
- Inability to repay (ITR), which is expressed in internal rating of the counterparty.

Usually only 90 DPD and distressed restructuring are considered as default indicators for Retail borrowers, if there is no additional information available on a counterparty level.

Apart from the criteria, listed above the Group would classify as default, i.e. include in stage 3, if relevant, following cases:

- Call upon guarantee;
- Partial Write-off;

Specific portfolios or segments, in case of global macroeconomic changes, which are expected to have detrimental impact on certain segments.

Apart from the criteria, listed above, in case of individual assessment of the counterparties above significance threshold in order to classify a counterparty as defaulted, the bank analysis number of qualitative factors. The below list is not exhaustive:

- A borrower’s sources of recurring income will be no longer available due to incurred disappearance of the market that will result reduction of the borrowers sales;
- Delays in payments to other creditors;
- Sales of significant assets of the borrower with loss;
- Termination of significant contract (customer or supplier) that generates significant portion of the revenue or purchases in the past;
- A breach of contract and the covenants of a credit contract;
- Initiation of legal proceedings, that may result in significant cash outflow;
- It is becoming probable that the borrower will enter bankruptcy or other financial reorganisation;
- A crisis of the sector in which the counterparty operates combined with a weak position of the counterparty in this sector.

An instrument is considered to no longer be in default (i.e. to have cured) when it no longer meets any of the default criteria for a consecutive period of six months. This period of six months has been determined expertly, based on an analysis that considers the likelihood of a financial instrument returning to default status after curing by using different possible definitions of cures.

31 Financial Risk Management (Continued)

The assessment whether or not there has been a significant increase in credit risk ("SICR") since initial recognition is performed on an individual basis for each commitment and on a portfolio basis. For loans issued to corporate entities, interbank loans and debt securities at AC or at FVOCI, SICR is assessed on an individual basis by monitoring the triggers stated below. For loans issued to individuals and other financial assets SICR is assessed on a portfolio basis, but finally SICR is assigned to a particular loan and not to all loans of a borrower. The criteria used to identify a SICR are monitored and reviewed periodically for appropriateness by the Bank's Risk Management Department. The presumption, being that there have been significant increases in credit risk since initial recognition when financial assets are more than 30 days past due, has not been rebutted.

The Group uses low credit risk assessment exemption for investment grade financial assets. The Group assumes that assets with an external 'investment-grade' rating (e.g., ratings within the AAA through BBB categories using the Standard & Poor's rating system or corresponding to Moody's) have low credit risk at the reporting date. The Group doesn't use Low Risk assessment exemption as of reporting date.

The Group considers a financial instrument to have experienced an SICR when one or more of the following quantitative, qualitative or backstop criteria have been met.
For interbank operations and bonds issued by banks:

- 30 days past due;
- Award of external rating corresponding to the risk grade "Special monitoring" according to the rating scale disclosed above.
- For loans issued to legal entities and bonds issued by corporate customers:
- 30 days past due;
- Restructuring (if exposure is not defaulted);
- Change of internal rating corresponding to the downwards movement from credit risk grades "excellent" or "good" to "Satisfactory" or "Special Monitoring".

For loans to Individuals:

- 30 days past due;
- Restructuring (if exposure is not defaulted);
- Significant increase in lifetime PD above predefined absolute and relative thresholds for retail portfolio.

The level of ECL that is recognised in these financial statements depends on whether the credit risk of the borrower has increased significantly since initial recognition. This is a three-stage model for ECL measurement. A financial instrument that is not credit-impaired on initial recognition and its credit risk has not increased significantly since initial recognition has a credit loss allowance based on 12-month ECLs (Stage 1). If a SICR since initial recognition is identified, the financial instrument is moved to Stage 2 but is not yet deemed to be credit-impaired and the loss allowance is based on lifetime ECLs. If a financial instrument is credit-impaired, the financial instrument is moved to Stage 3 and loss allowance is based on lifetime ECLs. The consequence of an asset being in Stage 3 is that the entity ceases to recognise interest income based on gross carrying value and applies the asset's effective interest rate to the carrying amount, net of ECL, when calculating interest income.

31 Financial Risk Management (Continued)

If there is evidence that the SICR criteria are no longer met, the instrument is transferred back to Stage 1. If an exposure has been transferred to Stage 2 based on a qualitative indicator, the Group monitors whether that indicator continues to exist or has changed, this is particular will be true for portfolios which have been included in Stage 2 based on watch list status. Regular, at least yearly monitoring is performed for such portfolios to include latest developments into ECL assessment.

ECL for POCI financial assets is always measured on a lifetime basis. The Group therefore only recognises the cumulative changes in lifetime expected credit losses.

The Group performs assessment on an individual basis for the groups of borrowers with unique credit risk characteristics and significant exposures, that is, exposures above GEL 2,000 thousand. Current threshold was set based on expert decision taking into consideration current structure of the Bank's Portfolio, and might be re-assessed only in case of significant changes in portfolio volume and structure.

The Group performs assessment on a portfolio basis for the following types of loans: retail loans and loans issued to Corporate SMEs, when the exposure is under the significance threshold. Under this approach loan pools are stratified into homogeneous sub-segments based on -specific characteristics, for example product types, historical data on losses, location, sectors of activity, loan currency etc.

The Group performs assessments based on external ratings for interbank loans, debt securities issued by the banks and loans issued to sovereigns.

ECL assessment on an individual basis is performed by weighting the estimates of credit losses for different possible outcomes against the probabilities of each outcome. The Group defines at least two possible outcomes for each assessed loan, one of which leads to a credit loss even if the probability of such a scenario may be very low. Individual assessment is primarily based on the expert judgement of experienced officers from the Credit Risk and Problem Assets Management Department, with support of credit risk experts, who are the primary source of information from borrower's side. Expert judgements are regularly tested in order to decrease the difference between estimates and actual losses.

When assessment is performed on a portfolio basis, the Group determines the staging of the exposures and measures the loss allowance on a collective basis. The Group analyses its exposures by segments determined on the basis of shared credit risk characteristics, such that exposures within a group have homogeneous or similar risks. The key shared credit characteristics considered are: type of customer (such as wholesale or retail), product type, date of initial recognition, term to maturity etc. Different segments also reflect differences in credit risk parameters such as PD and LGD. The appropriateness of groupings is monitored and reviewed on a periodic basis by the Risk Management Department.

In general, ECL is the sum of the multiplications of the following credit risk parameters: EAD, PD and LGD, that are defined as explained above, and discounted to present value using the instrument's effective interest rate. The ECL is determined by predicting credit risk parameters (EAD, PD and LGD) for each future quarter during the lifetime period for each individual exposure or collective segment. These three components are multiplied together. This effectively calculates an ECL for each future period that is afterword discounted back to the reporting date and summed up. The discount rate used in the ECL calculation is the original effective interest rate or an approximation thereof.

31 Financial Risk Management (Continued)

The key principles of calculating the credit risk parameters. The EADs are determined based on the expected payment profile based on the contractual repayments owed by the borrower over a 12-month or lifetime basis. Due to the insufficient data on the payment periodicity for instruments with non-monthly schedules, the assumption of 30-day schedule has been used for the entire Retail portfolio. The impact of this simplification was assessed as immaterial. Currently the Group doesn't consider early partial repayment assumptions in ECL assessment for Retail portfolio (the impact was assessed to be insignificant). For revolving products like overdrafts and credit cards the EAD is predicted by taking the current drawn balance and adding a "credit conversion factor" that accounts for the expected drawdown of the remaining limit by the time of default. Due to the data limitation problem, it is not possible to calculate CCF for credit cards and overdrafts, therefore CCF is assumed to be 100% for retail and corporate credit cards and overdrafts. As of December 31, 2021 credit cards and overdrafts portfolio is insignificant. The Group obliges itself to introduce more precise model of assessing CCF, as soon as portfolio of credit cards and overdrafts will become significant. Unlike CCF, which is used for credit cards and overdrafts, Utilization Rate is calculated and updated for each reporting period for the committed, but undrawn limits for Corporate and SME exposures. Utilization rate is the assessment for the expected drawdown of the remaining limit by the time, when counterparty defaults and is calculated based on the analysis of past data, i.e. historical data on corporate and SME exposures with remaining undrawn limit at the moment of default.

Two types of PDs are used for calculating ECLs: 12-month and lifetime PD. An assessment of a 12-month PD is based on the latest available historic default data and adjusted for supportable forward-looking information when appropriate. Lifetime PDs represent the estimated probability of a default occurring over the remaining life of the financial instrument and it is a sum of the 12 months PDs over the life of the instrument.

The Group uses different statistical approaches depending on the segment and product type to calculated lifetime PDs, such as the extrapolation of 12-month PDs based on migration matrixes for Corporate and SME loans, developing lifetime PD curves based on the historical default data for Retail loans.

LGD represents the Group's expectation of the extent of loss on a defaulted exposure. The approach currently used by the Group for LGD measurement can be divided into three steps:

- Calculation of LGD on a portfolio basis based on recovery statistics; LGD1- recoveries based on solely clients cash payments
- Measurement of LGD based on the specific characteristics of the collateral; LGD2 - recoveries expected based on the specific real estate collateral: projected collateral values, historical discounts on sales and other factors for loans secured by real estate, cash and liquid securities
- Final LGD= LGD1*LGD2

The rationale behind the Group’s approach is the observation that even after default, certain part of defaulted exposure is covered by borrowers own cash payments, without realizing the underlying collateral. Therefore underlying collateral is used to cover the remaining defaulted liability, only after the borrower has exhausted payment possibilities. LGD is calculated on a collective basis based on the latest available recovery statistics for the remainder of the corporate/SME loan portfolio and for retail homogenous sub-portfolios.

The Group has applied a floor to final estimated LGD. The rationale for applying the floor is that there are factors, which cannot be modelled even in the pessimistic scenario, which can result in a loss even in case of over-collateralized assets. The Group applies LGD floor as management adjustment to the model estimates and the floor value is subject to regular back-testing and reviews. ECL Sensitivity to LGD floor is disclosed in note 31.

31 Financial Risk Management (Continued)

The Group regularly reviews its methodology and assumptions to reduce any difference between the estimates and the actual loss of credit. Under IFRS9, validation and back-testing of all applied parameters and significant assumptions is an inherent part of ECL assessment process. The results of back testing the ECL measurement methodology are communicated to Group Management and further steps for tuning models and assumptions are defined after discussions between authorised persons.

During 2021 the Group has performed back-tests of the assumptions, thresholds and risk parameters used in IFRS9 impairment model, in order to assess the adequacy of forecasts for financial year 2021 as estimated by the IFRS9 impairment models at the end of previous year. The tests were concluded with satisfactory results and no changes have been regarding any model parameters.

ECL measurement for financial guarantees and loan commitments. The ECL measurement for these instruments includes the same steps as described above for on-balance sheet exposures and differs with respect to EAD calculation. The EAD is a product of credit conversion factor ("CCF") and amount of the commitment. CCF for undrawn credit lines of corporate customers, credit cards issued to individuals and for financial guarantees is defined based on statistical analysis of past exposures at default. CCF for overdrafts is defined as 100% since the limits can be used by the customers at any time.

Principles of assessment based on external ratings. Certain exposures have external credit risk ratings and these are used to estimate credit risk parameters PD and LGD from the default and recovery statistics published by the respective rating agencies. This approach is applied to government, corporate bonds and interbank exposures.

ECL Measurement on finance lease assets. The Group estimates the loss allowance on finance lease assets at the end of the reporting period, whereby the Group classifies lease receivables in Stage 1, Stage 2 or Stage 3 in compliance of IFRS9 requirements: Namely, at each reporting date, the Group assesses whether the credit risk on a financial instrument has increased significantly since initial recognition (SICR feature). The evaluation is performed mainly based on quantitative criteria and the SICR feature and/or Default are identified if the following occurs:

- all lease receivables with more than 30 DPD currently and/or in last 6 months as having significantly increase in credit risk since initial recognition are considered to have SICR feature and are classified in Stage 2
- all lease receivables with current 90 DPD, or problematic restruturing within last 12 months are considered to have default indicator and are classified in Stage 3

The Group uses the following designations for the ECL depending on the exposure allocation to the Stage:

- 12months ECL for Stage 1 lease receivables,
- Lifetime ECL for Stage 2 and stage 2 lease receivables

With reference to expected credit losses, IFRS 9 impairment framework includes a requirement to incorporate forward-looking information, including macroeconomic factors in the process of estimating expected credit losses (ECL) by evaluating a range of possible states of the economic environment. The scenarios are defined as baseline (most likely, 50% probability of occurring), upside (better than most likely, 25% probability of occurring) and downside (worse than most likely, 25% probability of occurring). The Group analyses the ECL parameters separately in different scenarios and derives the final ECL estimate used in the loss allowance calculation process as a probability-weighted amount, where the weights represent the probabilities of individual scenarios occurring.

Insurance risk: The Group has exposure to market risk through its insurance and investment activities. The Company manages its insurance risk through the use of reinsurance of risk concentrations, underwriting limits, approval procedures for transactions and monitoring of emerging issues.

31 Financial Risk Management (Continued)

Claims management risk: In general, motor claims reporting lags are minor, if any, and claim complexity is relatively low. Overall the claims liabilities for this line of business create a moderate estimations risk. The Company monitors and reacts to trends in repair costs, injury awards and the frequency of theft and accident claims.

The frequency of claims is affected by adverse weather conditions, and the volume of claims is higher in the winter months. Motor lines of insurance are underwritten based on the Company's current experience.

Reinsurance risk: The Group cedes insurance risk to limit exposure to underwriting losses under various agreements that cover individual and portfolio risks. These reinsurance agreements spread the risk and minimize the effect of losses. The amount of each risk retained depends on the Company's evaluation of the specific risk. Under the terms of the reinsurance agreements, the reinsurer agrees to reimburse the ceded amount in the event the claim is paid. However, the Company remains liable to its policyholders with respect to ceded insurance if any reinsurer fails to meet the obligations it assumes. When selecting a reinsurer, the Company considers their relative creditworthiness. The creditworthiness of the reinsurer is assessed mainly from publicly available information.

Reserving risk: There is a risk that reserves are assessed incorrectly and there are not enough funds to pay or handle claims as they fall due. To estimate insurance and reinsurance liabilities, the Company uses actuarial methods and assumptions set by the Insurance State Supervision Service of Georgia.

Credit risk in respect to insurance: The Group is not subject to significant credit risk on receivables arising out of direct insurance operations as policies are cancelled and the unearned premium reserve relating to the policy is similarly cancelled when there is objective evidence that the policyholder is not willing or able to continue paying policy premiums. Management normally fully provides for impaired insurance receivables after they are 365 days overdue.

Management of risk in insurance. The Group's underwriting strategy seeks diversity so that the Group's portfolio at all times includes several classes of non-correlating risks and that each class of risk, in turn, is

spread across a large number of policies. Management believes that this approach reduces the variability of the outcome.

The underwriting strategy is set out in the Group's insurance risk management policies. The strategy is implemented through underwriting guidelines that determine detailed underwriting rules for each type of product. The guidelines contain insurance concepts and procedures, descriptions of inherent risk, terms and conditions, rights and obligations, documentation requirements, template agreement/policy examples, rationale of applicable tariffs and factors that would affect the applicable tariff. The tariff calculations are based on probability and variation.

Adherence to the underwriting guidelines is monitored by the Management on an on-going basis, also on a regular basis the Supervisory Board monitors the trends of loss ratio and business profitability. Regular analysis triggers the Board to react accordingly, and to provide changes in the products pricing/specifications in order to maintain the desired loss ratio.

Market risk. The Group takes on exposure to market risks. Market risks arise from open positions in (a) currency, (b) interest rates and (c) equity products, all of which are exposed to general and specific market movements. Management sets limits on the value of risk that may be accepted, which is monitored on a daily basis. However, the use of this approach does not prevent losses outside of these limits in the event of more significant market movements.

31 Financial Risk Management (Continued)

Currency risk. In respect of currency risk, management sets limits on the level of exposure by currency and in total for both overnight and intra-day positions, which are monitored daily. The Group's exposure to foreign currency exchange rate risk at 31 December 2021 is presented in the table below:

	GEL	USD USD 1 =3.0976 GEL	EUR EUR 1 =3.5040 GEL	Other currency	December 31, 2021 Total
Cash and cash equivalents	69,425	87,964	26,041	8,363	191,793
Mandatory cash balances with the NBG	-	137,483	40,096	-	177,579
Due from other banks	12,899	-	-	-	12,899
Investments in debt securities	199,745	10,954	-	-	210,699
Loans and advances to customers	593,948	464,816	180,969	-	1,239,733
Finance leases to customers	6,897	2,139	-	-	9,036
Insurance assets	2,558	9,156	103	-	11,817
Other financial assets	846	471	39	-	1,356
Total non-derivative financial assets	**886,318**	**712,983**	**247,248**	**8,363**	**1,854,912**
Non-derivative financial liabilities					
Due to other banks	220,524	2,307	-	-	222,831
Customer accounts	327,191	472,953	71,677	8,358	880,179
Borrowed funds	67,680	182,565	179,245		429,490
Lease liabilities	218	4,527	-	-	4,745
Insurance liabilities	3,453	7,985	121	-	11,559
Other financial liabilities	2,512	503	116	-	3,131
Subordinated debt	-	15,562	-	-	15,562
Total non-derivative financial liabilities	**621,578**	**686,402**	**251,159**	**8,358**	**1,567,497**
OPEN BALANCE SHEET POSITION	**264,740**	**26,581**	**(3,911)**	**5**	**287,415**
OPEN POSITION	**264,740**	**26,581**	**(3,911)**	**5**	**287,415**

31 Financial Risk Management (Continued)

The Group's exposure to foreign currency exchange rate risk at 31 December 2020 is set out below:

	GEL	USD USD 1 =3.2766 GEL	EUR EUR 1 =4.0233 GEL	Other currency	December 31, 2020 Total
Non-derivative financial assets					
Cash and cash equivalents	214,171	103,505	85,742	1,671	405,089
Mandatory cash balances with the NBG	-	140,591	57,647	-	198,238
Due from other banks	13,424	-	-	-	13,424
Investments in debt securities	261,350	24,283	-	-	285,633
Loans and advances to customers	486,741	394,663	193,849	-	1,075,253
Finance leases to customers	5,108	-	-	-	5,108
Insurance assets	1,962	3,581	303	-	5,846
Other financial assets	807	508	22	-	1,336
Total non-derivative financial assets	**983,562**	**667,130**	**337,563**	**1,671**	**1,989,927**
Non-derivative financial liabilities					
Due to other banks	263,930	-	40,233	-	304,163
Customer accounts	393,954	426,785	116,440	1,536	938,715
Borrowed funds	88,244	211,615	177,153	-	477,012
Lease liabilities	306	4,506	-	-	4,812
Insurance liabilities	1,810	4,009	300	-	6,119
Other financial liabilities	3,700	1,689	913	-	6,302
Subordinated debt	-	16,368	-	-	16,368
Total non-derivative financial liabilities	**751,944**	**664,972**	**335,039**	**1,536**	**1,753,491**
OPEN BALANCE SHEET POSITION	**231,619**	**2,159**	**2,524**	**135**	**236,436**
Derivative financial instruments					
Gross settled:					
- foreign exchange forward contracts	1,187	-	(1,187)	-	-
OPEN POSITION ON DERIVATIVE FINANCIAL INSTRUMENTS	1,187	-	(1,187)	-	-
OPEN POSITION	**232,806**	**2,158**	**1,337**	**135**	**236,436**

The open currency position may cause substantial losses depending on the extent of difference and a change in exchange rate. In respect of currency risk, management sets limits on the level of exposure by currency and in total for both overnight and intra-day positions, which are monitored daily. General open currency position limits are set to minimize this risk insomuch as such change may adversely affect the Bank revenues, equity, liquidity and creditworthiness.

31 Financial Risk Management (Continued)

The open currency position is calculated and maintained on a daily basis. In the event of any violation, the Bank must perform balancing operations to bring the parameter within the approved limits. General open currency positions is a consolidated on-balance sheet and off-balance sheet position which must fall within the limits set by NBG, which is 20% of regulatory capital. However, ALCO introduces intra-day and overnight open currency position limits in aggregate and for individual currencies, within which the Bank may operate. Such limits are reviewed by ALCO from time to time to respond to market conditions. Bank's internal limits are significantly lower than the limits set by the NBG. Current limit equals 5% of the regulatory capital. The Group monitors under ICAAP framework its exposure to currency risk, according to 99% confidence level VaR at 10 day holding period. As at 31 December 2020 the VaR value amounted GEL 2,683 thousand (2020: GEL 4,287 thousand).

The following table presents sensitivities of profit or loss and equity to reasonably possible changes in exchange rates applied at the end of the reporting period relative to the functional currency of the respective Group entities, with all other variables held constant:

	At 31 December, 2021	**At 31 December, 2020**
In thousands of Georgian Lari	Impact on profit or loss	Impact on profit or loss
US Dollar strengthening by 20% (2020: strengthening by 20%)	6,345	431
US Dollar weakening by 20% (2020: weakening by 20%)	(6,345)	(431)
Euro strengthening by 20% (2020: strengthening by 20%)	(404)	267
Euro weakening by 20% (2020: weakening by 20%)	404	(267)

The exposure was calculated only for monetary balances denominated in currencies other than the functional currency of the respective entity of the Group.

The Group's exposure to currency risk at the end of the reporting period is not representative of the typical exposure during the year. The following table presents sensitivities of profit and loss and equity to reasonably possible changes in exchange rates applied to the daily average exposure to currency risk during the year, with all other variables held constant:

	Average exposure during 2021	**Average exposure during 2020**
In thousands of Georgian Lari	Impact on profit or loss	Impact on profit or loss
US Dollar strengthening by 20% (2020: strengthening by 20%)	(116)	210
US Dollar weakening by 20% (2020: weakening by 20%)	116	(21)
Euro strengthening by 20% (2020: strengthening by 20%)	508	244
Euro weakening by 20% (2020: weakening by 20%)	(508)	(244)

Interest rate risk. The Group takes on exposure to the effects of fluctuations in the prevailing levels of market interest rates on its financial position and cash flows. Interest margins may increase as a result of such changes, but may reduce or create losses in the event that unexpected movements arise. Management monitors on a daily basis and sets limits on the level of mismatch of interest rate repricing that may be undertaken.

31 Financial Risk Management (Continued)

The table below summarises the Group's exposure to interest rate risks. The table presents the aggregated amounts of the Group's financial assets and liabilities at carrying amounts, categorised by the earlier of contractual interest repricing or maturity dates:

In thousands of Georgian Lari	Demand and less than 1 month	From 1 to 6 months	From 6 to 12 months	More than 1 year	Non-monetary	Total
31 December, 2021						
Total financial assets	377,931	897,031	139,953	374,566	65,431	1,854,912
Total financial liabilities	606,607	351,005	188,042	190,850	230,993	1,567,497
Net interest sensitivity gap at 31 December 2021	**(228,676)**	**546,026**	**(48,089)**	**183,716**	**(165,562)**	**287,415**
31 December, 2020						
Total financial assets	651,657	744,819	144,189	380,104	69,219	1,989,988
Total financial liabilities	829,865	369,122	147,508	155,998	250,998	1,753,491
Net interest sensitivity gap at 31 December 2020	**(178,208)**	**375,697**	**(3,319)**	**224,106**	**(181,779)**	**236,497**

The sensitivity analyses below have been determined based on the exposure to interest rates for non-derivative instruments at the reporting date. For floating rate liabilities, the analysis is prepared assuming the amount of liability outstanding at the reporting date was outstanding for the whole year. A 200 basis points increase or decrease is used when reporting interest rate risk internally to key management personnel and represents management's assessment of the reasonably possible change in interest rates.

If interest rates had been 200 basis points higher/lower and all other variables were held constant, the Group's:
- Profit for the year ended 31 December 2021 would decrease/increase by GEL 3,244 thousand (2020: decrease/increase by GEL 2,809 thousand). This is mainly attributable to the Group's exposure to interest rates on its variable rate on asstes and borrowings; and

If interest rates had been 100 basis points higher/lower and all other variables were held constant, the Group's:
- Other comprehensive income would decrease/increase by GEL 3,030 million (2020: decrease/increase by GEL 1,072 million) mainly as a result of the changes in the interest income on variable interest assets and borrowings

The table below discloses interest rate changes impact on the fixed rate debt securities at FVOCI:

	2021	2020
Interest rate increases by 200 bases points	2,285	1,702
Interest rate Decreases by 200 bases points	(2,467)	(1,868)
Interest rate increases by 100 bases points	1,164	871
Interest rate Decreases by 100 bases points	(1,210)	(912)

31 Financial Risk Management (Continued)

The Group monitors interest rates for its financial instruments. The table below summarises weighted average nominal interest rates at the respective reporting date based on reports reviewed by key management personnel. For securities, the interest rates represent yields to maturity based on market quotations at the reporting date:

	2021			2020		
In % p.a.	GEL	USD	Euro	GEL	USD	Euro
Assets						
Cash and cash equivalents	10.0%	0.1%	-0.7%	4.6%	0.1%	-0.7%
Correspondent accounts with NBG	10.5%	-	-	8.7%	-0.3%	-
Mandatory cash balances with the NBG	-	-0.3%	-0.7%	-	-0.3%	-0.7%
Due from other banks	13.1%	-	-	11.5%	-	-
Investments in debt securities	9%	9.6%	-	8.2%	8.1%	-
Loans and advances to customers	13.7%	7.5%	6.0%	11.8%	7.8%	6.2%
Liabilities						
Due to other banks	10.6%	-	-	8.5%	-	1.6%
Customer accounts	9.9%	2.1%	1.0%	8.6%	2.8%	1.1%
- current and settlement accounts	8.1%	1.4%	1.1%	8.2%	2.0%	0.7%
- term deposits	10.6%	2.2%	1.0%	8.9%	2.8%	1.2%
Borrowed funds	13.4%	2.9%	3.3%	11.9%	3.9%	2.4%
Lease liabilities	10.0%	6.0%		10.0%	6.0%	-
Subordinated debt	-	7.0%	-	-	7.0%	-

The sign “-“ in the table above means that the Group does not have the respective assets or liabilities in the corresponding currency.

The Group is exposed to prepayment risk through providing fixed or variable rate loans, including mortgages, which give the borrower the right to repay the loans early. The Group’s current year profit and equity at the end of the current reporting period would not have been significantly impacted by changes in prepayment rates because such loans are carried at amortised cost and the prepayment right is at, or close to, the amortised cost of the loans and advances to customers (2020: no material impact).

The management of interest rate risk is regulated by the Assets and Liabilities Management (“ALM”) Policy of the Bank. The Risk Management department regularly produces a report on interest sensitivity gap by repricing periods. The report is used to assess the impact of changes in interest rates on the profit of the Bank. The amount of the stress (expressed in basis points) of the interest rates incorporated in the report is defined by the Risk Management department, based on observed fluctuations in interest rates for relevant currencies. The limit of tolerable potential impact on the profit of the Bank is defined as up to 1% of the regulatory capital.

31 Financial Risk Management (Continued)

Geographical risk concentrations. The geographical concentration of the Group's financial assets and liabilities at 31 December 2021 is set out below:

In thousands of Georgian Lari	Georgia	China	OECD	Non-OECD	Total
Non-derivative financial assets					
Cash and cash equivalents	91,631	5	100,052	105	191,793
Mandatory cash balances with the NBG	177,579	-	-	-	177,579
Due from other banks	12,899	-	-	-	12,899
Investments in debt securities	210,699	-	-	-	210,699
Loans and advances to customers	1,210,033	10,486	3,432	15,782	1,239,733
Finance leases to customers	9,036	-	-	-	9,036
Insurance assets	11,817	-	-	-	11,817
Other financial assets	987	51	207	111	1,356
Total non-derivative financial assets	**1,724,681**	**10,542**	**103,691**	**15,998**	**1,854,912**
Non-derivative financial liabilities					
Due to other banks	222,831	-	-	-	222,831
Customer accounts	767,310	83,566	16,449	12,854	880,179
Borrowed funds	-	15,556	413,934	-	429,490
Lease liabilities	4,745				4,745
Insurance liabilities	11,559	-	-	-	11,559
Other financial liabilities	3,074	19	38	-	3,131
Subordinated debt	-	15,562	-	-	15,562
Total non-derivative financial liabilities	**1,009,519**	**114,703**	**430,421**	**12,854**	**1,567,497**
Net position in on-balance sheet non-derivative financial instruments	**715,162**	**(104,161)**	**(326,730)**	**3,144**	**287,415**
Credit related commitments and performance guarantees	**242,632**	**9,176**	**-**	**-**	**251,808**

31 Financial Risk Management (Continued)

Assets, liabilities and credit related commitments have generally been based on the country in which the counterparty is located. Balances with counterparties outstanding to/from companies ultimately controlled by the entities located in China are allocated to the caption "China". Cash and cash equivalents have been allocated based on the country in which they are physically held.

The geographical concentration of the Group's financial assets and liabilities at 31 December 2020 is set out below:

In thousands of Georgian Lari	Georgia	China	OECD	Non-OECD	Total
Non-derivative financial assets					
Cash and cash equivalents	246,522	5	158,419	143	405,089
Mandatory cash balances with the NBG	198,238	-	-	-	198,238
Due from other banks	13,424	-	-	-	13,424
Investments in debt securities	285,633	-	-	-	285,633
Loans and advances to customers	1,055,163	330	1,683	18,077	1,075,253
Finance leases to customers	5,108	-	-	-	5,108
Insurance assets	5,846	-	-	-	5,846
Other financial assets	984	162	101	89	1,336
Total non-derivative financial assets	**1,810,918**	**497**	**160,203**	**18,309**	**1,989,927**
Non-derivative financial liabilities					
Due to other banks	304,163	-	-	-	304,163
Customer accounts	898,648	22,627	6,885	10,555	938,715
Borrowed funds	-	16,405	451,590	9,017	477,012
Lease liabilities	4,812				4,812
Insurance liabilities	6,119	-	-	-	6,119
Other financial liabilities	6,275	20	7	-	6,302
Subordinated debt	-	16,368	-	-	16,368
Total non-derivative financial liabilities	**1,220,017**	**55,420**	**458,482**	**19,572**	**1,753,491**
Net position in on-balance sheet non-derivative financial instruments	**590,901**	**(54,923)**	**(298,279)**	**(1,263)**	**236,436**
Credit related commitments and performance guarantees	**134,883**	**232**	**16**	**-**	**135,131**
Gross settled:					
- foreign exchange forward contracts	1,187	-	-	-	1,187
Net position on derivative financial instruments	**1,187**	**-**	**-**	**-**	**1,187**

31 Financial Risk Management (Continued)

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

The Group manages liquidity risk according to the Asset-Liability Management Policy and Regulation of Liquidity Management, where detailed processes and limit system for liquidity management is defined. The Asset/Liability Committee is responsible for the implementation of the Asset-Liability Management Policy, the daily management of liquidity is the responsibility of Treasury Department.

The Group seeks to maintain a stable funding base primarily consisting of amounts due to other banks, corporate and retail customer deposits, long-term borrowings and credit lines. The Group invests the funds in diversified portfolios of liquid assets, in order to be able to respond quickly and smoothly to unforeseen liquidity requirements.

The liquidity management of the Group requires consideration of the level of liquid assets necessary to settle obligations as they fall due; maintaining access to a range of funding sources; maintaining funding contingency plans; and monitoring liquidity ratios against regulatory requirements.

The liquidity is calculated and assessed on standalone basis. The Bank calculates and maintains liquidity in accordance with the requirement of the NBG on daily basis. These ratios are:

- Average liquidity ratio, which is calculated as the ratio of average liquid assets to average liabilities and borrowings up to six months and off-balance sheet liabilities limited to minimum 30% on monthly basis
- Liquidity Coverage Ratio (“LCR”), which is calculated as high-quality liquid assets divided by net cash outflows over a 30 day stress period. Only assets with high potential to be easily converted into cash are included in high-quality liquid assets.

	2021 actual	2021 NBG requirement	2020 actual	2020 NBG requirement
Average liquidity ratio	43%	>=30%	55%	>=30%
Total liquidity coverage ratio	138%	>=100%	167%	>=100%
Liquidity coverage ratio (GEL)	127%	>=75%	167%	>=75%
Liquidity coverage ratio (FC)	145%	>=100%	166%	>=100%

The Treasury Department receives information about the liquidity profile of the financial assets and liabilities. The Treasury Department then provides for an adequate portfolio of short-term liquid assets, largely made up of short-term liquid trading securities, deposits with banks and other inter-bank facilities, to ensure that sufficient liquidity is maintained within the Group as a whole.

The daily liquidity position is monitored and regular liquidity stress testing, under a variety of scenarios covering both normal and more severe market conditions, is performed by the Treasury Department.

The table below shows liabilities at 31 December 2021 by their remaining contractual maturity. The amounts of liabilities disclosed in the maturity table are the contractual undiscounted cash flows, including gross finance lease obligations (before deducting future finance charges), gross loan commitments and financial guarantees. Such undiscounted cash flows differ from the amount included in the statement of financial position because the amount in the statement of financial position is based on discounted cash flows. Financial derivatives are included at the contractual amounts to be paid or received, unless the Group expects to close the derivative position before its maturity date in which case the derivatives are included based on the expected cash flows.

31 Financial Risk Management (Continued)

In thousands of Georgian Lari	Demand and less than 1 month	From 1 to 6 months	From 6 to 12 months	From 12 months to 5 years	Over 5 years	Total
Non-derivative financial liabilities and commitments						
Due to other banks	220,524	-	2,307	-	-	222,831
Customer accounts – individuals	192,758	69,627	87,185	53,800	5,748	409,118
Customer accounts – other	309,440	62,543	18,711	82,344	18,843	491,881
Borrowed funds	53,327	80,227	110,461	210,619	-	454,634
Lease liabilities	111	542	572	3,332	829	5,386
Insurance liabilities	1,251	84	10,224	-	-	11,559
Other financial liabilities	2,519	234	378	-	-	3,131
Subordinated debt	-	531	531	18,897	-	19,959
Total non-derivative financial liabilities	**779,930**	**213,788**	**230,369**	**368,992**	**25,420**	**1,618,499**
Financial guarantees	78,289					78,289
Undrawn credit related commitments	134,908					134,908
Total potential future payments of financial obligations	**993,127**	**213,788**	**230,369**	**368,992**	**25,420**	**1,831,696**

31 Financial Risk Management (Continued)

The maturity analysis of financial instruments at 31 December 2020 is as follows:

In thousands of Georgian Lari	Demand and less than 1 month	From 1 to 6 months	From 6 to 12 months	From 12 months to 5 years	Over 5 years	Total
Non-derivative financial liabilities and commitments						
Due to other banks	304,163	-	-	-	-	304,163
Customer accounts – individuals	164,478	66,091	88,431	36,743	5,755	361,498
Customer accounts – other	399,169	107,688	28,381	40,101	18,349	593,688
Borrowed funds	16,506	158,733	72,027	259,408	-	506,674
Lease liabilities	117	506	547	3,080	845	5,095
Insurance liabilities	3,213	510	2,396	-	-	6,119
Other financial liabilities	5,297	212	583	210	-	6,302
Subordinated debt	-	562	562	4,495	16,617	22,236
Total non-derivative financial liabilities	**892,943**	**334,302**	**192,927**	**344,037**	**41,566**	**1,805,775**
Derivative financial instruments						
Gross settled:						
- foreign exchange forward contracts	-	1,187	-	-	-	1,187
Total derivative financial instruments	**-**	**1,187**	**-**	**-**	**-**	**1,187**
Financial guarantees	36,779					36,779
Undrawn credit related commitments	70,872	-	-	-	-	70,872
Total potential future payments of financial obligations	**1,000,594**	**335,489**	**192,927**	**344,037**	**41,566**	**1,914,613**

Liquidity requirements to support calls under guarantees and standby letters of credit are considerably less than the amount of the commitment disclosed in the above maturity analysis, because the Group does not generally expect the third party to draw funds under the agreement. The total outstanding contractual amount of commitments to extend credit as included in the above maturity table does not necessarily represent future cash requirements, since many of these commitments will expire or terminate without being funded.

Payments in respect of gross settled forwards will be accompanied by related cash inflows. Customer accounts are classified in the above analysis based on contractual maturities. However, in accordance with Georgian legislation, individuals have a right to withdraw their deposits prior to maturity if they forfeit their right to accrued interest.

The Group does not use the above maturity analysis based on undiscounted contractual maturities of liabilities to manage liquidity. Instead, the Group monitors expected maturities and the resulting expected liquidity gap as follows.

The table below shows the maturity analysis of non-derivative financial assets at their carrying amounts based on their contractual maturities, except for assets that are readily saleable if it should be necessary to meet cash outflows on financial liabilities.

31 Financial Risk Management (Continued)

Such financial assets are included in the maturity analysis based on their expected date of disposal. Impaired loans are included at their carrying amounts net of impairment provisions, and based on the expected timing of cash inflows. When the amount payable is not fixed, the amount disclosed is determined by reference to the conditions existing at the end of the reporting period. Foreign currency payments are translated using the spot exchange rate at the end of the reporting period.

The maturity analysis of financial instruments at 31 December 2021 is as follows:

In thousands of Georgian Lari	Demand and less than 1 month	From 1 to 6 months	From 6 to 12 months	From 12 months to 5 years	Over 5 years	Total
At 31 December, 2021						
Non-derivative financial assets						
Cash and cash equivalents	191,410	383	-	-	-	191,793
Mandatory cash balances with the NBG	177,579	-	-	-	-	177,579
Due from other banks	-	485	12,414	-	-	12,899
Investments in debt securities	-	80,064	22,106	108,530	-	210,700
Loans and advances to customers	64,436	156,167	168,967	533,323	316,840	1,239,733
Finance leases to customers	292	42	269	8,392	41	9,036
Insurance assets	1,276	1,390	9,151	-	-	11,817
Other financial assets	1,202	-	40	-	114	1,356
Total non-derivative financial assets	**436,195**	**238,531**	**212,947**	**650,245**	**316,995**	**1,854,913**
Non-derivative financial liabilities						
Due to other banks	220,524	-	2,307	-	-	222,831
Customer accounts – individuals	29,019	79,368	94,464	86,980	109,887	399,718
Customer accounts – other	23,373	78,759	30,642	131,418	216,269	480,461
Borrowed funds	53,991	71,652	104,886	198,961	-	429,490
Lease liabilities	230	436	486	2,841	752	4,745
Insurance liabilities	1,758	1,469	8,332	-	-	11,559
Other financial liabilities	2,519	234	378	-	-	3,131
Subordinated debt	-	-	-	15,562	-	15,562
Total non-derivative financial liabilities	**331,414**	**231,918**	**241,495**	**435,762**	**326,908**	**1,567,497**
Financial and performance guarantees	285	-	-			285
Undrawn credit related commitments	13,491					13,491
Net liquidity gap based on expected maturities	**91,004**	**6,613**	**(28,548)**	**214,483**	**(9,913)**	**273,640**
Cumulative liquidity gap based on expected maturities	**-**	**97,618**	**69,070**	**283,552**	**273,640**	

31 Financial Risk Management (Continued)

The expected maturities analysis of financial instruments at 31 December 2020 is as follows:

In thousands of Georgian Lari	Demand and less than 1 month	From 1 to 6 months	From 6 to 12 months	From 12 months to 5 years	Over 5 years	Total
At 31 December, 2020						
Non-derivative financial assets						
Cash and cash equivalents	405,089	-	-	-	-	405,089
Mandatory cash balances with the NBG	198,239	-	-	-	-	198,239
Due from other banks	1,812	3,449	8,163	-	-	13,424
Investments in debt securities	86,703	35,883	28,643	107,201	27,203	285,633
Loans and advances to customers	59,381	177,449	124,207	404,255	309,961	1,075,253
Finance leases to customers	8	43	74	4,983	-	5,108
Insurance assets	657	3,648	1,541	-	-	5,846
Other financial assets	1,171	-	-	-	165	1,336
Total non-derivative financial assets	**753,060**	**220,472**	**162,628**	**516,439**	**337,329**	**1,989,928**
Non-derivative financial liabilities						
Due to other banks	304,163	-	-	-	-	304,163
Customer accounts – individuals	36,176	69,864	92,676	62,441	94,609	355,766
Customer accounts – other	103,149	123,891	33,742	130,581	191,586	582,949
Borrowed funds	57,218	150,283	73,992	195,519	-	477,012
Lease liabilities	114	397	438	2,958	905	4,812
Insurance liabilities	3,213	510	2,396	-	-	6,119
Other financial liabilities	5,297	212	583	210	-	6,302
Subordinated debt	-	-	-	-	16,368	16,368
Total non-derivative financial liabilities	**509,330**	**345,157**	**203,827**	**391,709**	**303,468**	**1,753,491**
Financial and performance guarantees	313	-	-	-	-	313
Undrawn credit related commitments	7,087	-	-	-	-	7,087
Net liquidity gap based on expected maturities	**236,330**	**(124,685)**	**(41,199)**	**124,730**	**33,861**	**229,037**
Cumulative liquidity gap based on expected maturities	**-**	**111,645**	**70,446**	**195,176**	**229,037**	

Mandatory reserve with NBG is classified on on-demand category as they are created to support the bank's capability to meet its obligations in the event of an unforeseen interruption of cash flows. Overdue assets over 90 days are reflected in "over 5 years" time package.

Amounts for financial and performance guarantees and undrawn credit lines are disclosed based on expected cash outflows. 10% of total credit line commitments are expected to be utilised and disclosed as expected cash outflow. Customer accounts expected maturities are calculated according to VaR methodology, outflow rates are calculated at 95% confidence interval for each time bucket.

31 Financial Risk Management (Continued)

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

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

32 Management of Capital

The Group's objectives when managing capital are (i) to comply with the capital requirements set by the National Bank of Georgia, (ii) to safeguard the Group's ability to continue as a going concern and (iii) to maintain a sufficient capital base to achieve a capital adequacy ratio based on the Basel Accord of at least above the minimum level stated in borrowing agreements.

Compliance with capital adequacy ratios set by the NBG is monitored monthly, with reports outlining their calculation reviewed and signed by Deputy General Director, Finances. Other objectives of capital management are evaluated quarterly.

In the process of transition to Basel III framework, to increase transparency and comparability and segregate between available Capital instruments, for coverage of potential risks, the National Bank of Georgia ("NBG") amended Capital Adequacy requirements in December 2017 and in addition to the minimum capital requirements under pillar 1, in updated framework new Pillar 1 and Pillar 2 buffers were introduced:
Buffers under pillar 1:

- The capital conservation buffer - 2.5% of risk-weighted assets, and is designed to provide for losses in the event of stress, included in minimum capital requirements;
- The countercyclical capital buffer - was introduced within the Basel III framework and represents one of the main macro-prudential policy instruments, currently set at 0%;
- Systemic buffers - are set separately for each commercial bank considered to be systematically important (not applicable for Basis bank)

Buffers under pillar 2:

- Unhedged currency induced credit risk buffer (CICR);
- Credit portfolio concentration buffer, which entails name and sectoral concentration buffers;
- Net stress test buffer, will be introduced in accordance with stress tests results administered by the NBG;
- Net GRAPE buffer, set in accordance with the NBG's General Risk Assessment Program and the assessment of banks' internal capital requirement;

Under the current capital requirements set by the NBG, banks have to maintain a ratio of regulatory capital to risk weighted assets ("statutory capital ratio") above a prescribed minimum level.

Under the current capital requirements the banks are to maintain a ratio of regulatory capital to risk weighted assets ("statutory capital ratio") above a prescribed minimum level.

In 2020 the regulatory capital requirement was reduced by the NBG in response to the the pressure put by the COVID-19 pandemic on banks RWA and capital.

32 Management of Capital (Continued)

The following capital buffers were released:

- The capital conservation buffer (2.5% of the risk-weighted assets);
- 2/3 of the currency induced credit risk buffer);
- Postponed the phasing in of additional capital buffer from CAR to CET1 requirements.

BasisBank has restored the temporarily released capital buffers in October 2021. The Bank have complied with all NBG's capital requirements throughout 2021 and 2020.

The following Capital adequacy report of the Bank is prepared under standalone basis in accordance with NBG standards:

In thousands of Georgian Lari	**2021 Pillar I/II**	**2020 Pillar I/II**
Primary capital		
Share capital	16,181	16,181
Share premium	76,413	76,413
Retained earnings according to the NBG regulations	145,644	138,460
Revaluation reserve	13,936	9,513
Current year profit according to NBG regulations	43,753	5,972
Primary capital Before Correction	**295,927**	**246,539**
Primary capital Corrections	(20,925)	(14,424)
Total primary capital after correction	**275,002**	**232,115**
Secondary capital		
Subordinated debt	12,143	16,055
General reserve	19,394	17,313
Total secondary capital	**31,537**	**33,368**
Total regulatory capital	**306,539**	**265,483**
Risk weighted assets, combining credit, market and operational risks	**1,706,475**	**1,519,304**
Minimum NBG requirement for Tier 1 ratio	***11.30%***	***7.2%***
Tier I ratio	**16.12%**	**15.3%**
Minimum NBG requirement for Regulatory capital ratio	***15.87%***	***12.3%***
Regulatory capital ratio	**17.96%**	**17.5%**

33 Contingencies and Commitments

Legal proceedings. From time to time and in the normal course of business, claims against the Group may be received. On the basis of its own estimates and internal and external professional advice, management assesses the likelihood, amount and timing of incurring losses on these claims and provides the provisions based on these assumptions. In 2021 GEL 493 thousand of provision has been created againts these claims.

Tax contingencies. Georgian tax legislation which was enacted or substantively enacted at the end of the reporting period, is subject to varying interpretations when being applied to the transactions and activities of the Group. Consequently, tax positions taken by management and the formal documentation supporting the tax positions may be challenged tax authorities. A tax year remains open to review by the authorities in respect of taxes for three calendar years preceding the year when decision about review was made. Under certain circumstances reviews may cover longer periods.

The Bank was under inspection of tax authorities for the tax period starting from 1 April 2015 until 31 August 2018.There are certain areas which were questioned by the tax authorities, the Bank has not agreed with some estimations and appealed to court, disputes were not settled as at 31 December 2021. The onsite inspection is concluded, the total accruals made after inspection are given in below table. In 2021 Bank has created provision of GEL 581 thousand (2020: GEL 59 thousand) on positions where it is probable that the Bank will have to make additional payments. For the rest of the disputed amount the Group's management believes that it is not likely that any significant loss will eventuate and no provisions are created.

In thousands of Georgian Lari	**31 December, 2021**	**31 December, 2020**
Total disputed amount	493	-
Tax contingent laliiity	581	415
Provision created	(1,074)	(59)
Tax contingent liability	**-**	**356**

The Georgian transfer pricing legislation is generally aligned with the international transfer pricing principles developed by the Organisation for Economic Cooperation and Development (OECD), although it has specific features. This legislation provides for the possibility of additional tax assessment for controlled transactions (transactions between related parties and certain transactions between unrelated parties) if such transactions are not on an arm's-length basis. The Management has implemented internal controls to be in compliance with this transfer pricing legislation.

Management believes that it has provided adequately for tax liabilities based on its interpretations of applicable Georgian tax legislation, official pronouncements and court decisions. However, the interpretations of the relevant authorities could differ and the effect on the financial position, if the authorities were successful in enforcing their interpretations, could be significant. The Group consults with qualified external tax advisors on a regular basis.

Lease commitments. Where the Group is the lessee, the future minimum lease payments under non-cancellable operating leases are as follows:

In thousands of Georgian Lari	**2021**	**2020**
Not later than 1 year	13	19
Total operating lease commitments	**13**	**19**

33 Contingencies and Commitments (Continued)

The Group leases a part of premises rented for location of equipment (ATMs) under operating leases which are not included into Right of Use Assets. The leases typically run for an initial period of one to five years, with an option to renew the lease after that date. Lease payments are usually increased annually to reflect market rentals

Compliance with covenants. The Group is obligated to comply with financial covenants in relation to other borrowed funds and credit lines disclosed above. These covenants include stipulated ratios, debt to equity ratios and various other financial performance ratios. The Group has not breached any of these covenants during the year ended December 31, 2021. During 2020, the Bank has breached open credit exposure covenants under the loan agreements resulted from the increased exposure of restructured loans affected by the COVID-19 modifications. The Bank has obtained waivers for the covenant and is not in breach of contracts terms as at 31 December 2020.

The Bank is also subject to minimum capital requirements established by covenants stated in loan agreements, including capital adequacy levels calculated in accordance with the requirements of the Basel Accord, as defined in the International Convergence of Capital Measurement and Capital Standards (updated April 1998) and the Amendment to the Capital Accord to incorporate market risks (updated November 2005), commonly known as Basel I.

The composition of the Bank's capital calculated in accordance with the Basel Accord is as follows:

In thousands of Georgian Lari	**31 December, 2021**	**31 December, 2020**
Tier 1 capital		
Share capital and share premium	90,980	90,980
Retained earnings	237,507	201,381
Total tier 1 capital	**328,487**	**292,361**
Tier 2 capital		
Revaluation reserves	12,670	9,165
Subordinated debt	12,450	16,368
Total tier 2 capital	**25,120**	**25,533**
Total capital	**353,607**	**317,894**

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

Commitments to extend credit represent unused portions of authorisations to extend credit in the form of loans, guarantees or letters of credit. With respect to credit risk on commitments to extend credit, the Group is potentially exposed to loss in an amount equal to the total unused commitments, if the unused amounts were to be drawn down. However, the likely amount of loss is less than the total unused commitments since most commitments to extend credit are contingent upon customers maintaining specific credit standards.

The Group monitors the term to maturity of credit related commitments, because longer-term commitments generally have a greater degree of credit risk than shorter-term commitments.

33 Contingencies and Commitments (Continued)

Outstanding credit related commitments are as follows:

In thousands of Georgian Lari	Note	31 December, 2021	31 December, 2020
Financial guarantees issued		78,374	36,860
Undrawn credit line commitments		135,214	71,088
Total loan commitments		**213,588**	**107,948**
Less: Provision for financial guarantees	21	(85)	(81)
Less: Provision for loan commitments		(306)	(216)
Less: Commitment collateralised by cash deposits		(14,418)	(14,954)
Total credit related commitments, net of provision and cash covered exposures		**198,779**	**92,697**

Movements in provisions for financial guarantees are as follows:

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Total provision	Gross guaranteed amount
Provision for financial guarantees at 31 December 2020	**(81)**	**(81)**	**36,860**
Movements with impact on provision for credit related commitments charge for the period:			
Transfers:			
Issued guarantees	(77)	(77)	63,650
Derecognised during the period	72	72	(21,304)
Total movements with impact on provision for credit related commitments for the year	**(5)**	**(5)**	**42,346**
Movements without impact on provision for credit related commitments charge for the period:			
FX movements	1	1	(832)
Provision for financial guarantees at 31 December 2021	**(85)**	**(85)**	**78,374**

33 Contingencies and Commitments (Continued)

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Total provision	Gross guaranteed amount
Provision for financial guarantees at 31 December 2019	**(81)**	**(268)**	**(349)**	**57,858**
Movements with impact on provision for credit related commitments charge for the period:				
Transfers:				
Issued guarantees	(58)	-	(58)	24,811
Derecognised during the period	62	268	330	(47,490)
Total movements with impact on provision for credit related commitments for the year	**4**	**268**	**272**	**(22,679)**
Movements without impact on provision for credit related commitments charge for the period:				
FX movements	(4)	-	(4)	1,681
Provision for financial guarantees at 31 December 2020	**(81)**	**-**	**(81)**	**36,860**

Movements in the provision for loan commitments were as follows.

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total provision	Gross committed amount
Provision for loan commitments at 31 December 2020	**(194)**	**(16)**	**(351)**	**(561)**	**121,147**
Movements with impact on provision for credit related commitments charge for the period:					
Transfers:					
- to lifetime (from Stage 1 to Stage 2)	1	(1)	-	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)					
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	(157)	158	1	2	-
Issued loan commitments	(140)	(180)	(1)	(321)	125,193
Derecognised during the period*	182	14	351	547	(108,358)
Total charge to profit or loss for the year	**(114)**	**(9)**	**351**	**228**	**16,835**
Movements without impact on provision for credit related commitments charge for the period:					
FX movements	4	23	-	27	(2,768)
Provision for loan commitments at 31 December 2021	**(304)**	**(2)**	**-**	**(306)**	**135,214**

33 Contingencies and Commitments (Continued)

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total provision	Gross committed amount
Provision for loan commitments at 31 December 2019	**(98)**	**(90)**	**(104)**	**(292)**	**65,965**
Movements with impact on provision for credit related commitments charge for the period:					
Transfers:					
- to lifetime (from Stage 1 to Stage 2)	14	(14)	-	-	-
- to credit-impaired (from Stage 1 and Stage 2 to Stage 3)	5	53	(58)	-	-
- to 12-months ECL (from Stage 2 and Stage 3 to Stage 1)	(37)	37	-	-	-
Issued loan commitments	(94)	(54)	-	(148)	42,675
Derecognised during the period*	72	57	104	233	(41,461)
Total charge to profit or loss for the year	**(40)**	**79**	**46**	**85**	**1,214**
Movements without impact on provision for credit related commitments charge for the period:					
FX movements	(4)	(5)	-	(9)	3,909
Provision for loan commitments at 31 December 2020	**(142)**	**(16)**	**(58)**	**(216)**	**71,088**

* Derecognised during the period line includes expiry of commitments and disbursement of loans.

33 Contingencies and Commitments (Continued)

An analysis of credit related commitments by credit quality based on credit risk grades at 31 December 2020 is as follows.

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total
Issued financial guarantees				
- Excellent	7,408	-	-	7,408
- Good	70,505	-	-	70,505
- Satisfactory	-	461	-	461
Unrecognised gross amount	**77,913**	**461**	**-**	**78,374**
Provision for financial guarantees	**(85)**	**-**	**-**	**(85)**
Loan commitments				
- Excellent	3,320	-	-	3,320
- Good	130,575	-	-	130,575
- Satisfactory	-	750	-	750
- Special monitoring	-	-	-	-
- Default	-	-	569	569
Unrecognised gross amount	**133,895**	**750**	**569**	**135,214**
Provision for loan commitments	**(304)**	**(2)**	**-**	**(306)**

33 Contingencies and Commitments (Continued)

An analysis of credit related commitments by credit quality based on credit risk grades at 31 December 2020 is as follows.

In thousands of Georgian Lari	Stage 1 (12-months ECL)	Stage 2 (lifetime ECL for SICR)	Stage 3 (lifetime ECL for credit im-paired)	Total
Issued financial guarantees				
- Excellent	5,260	-	-	5,260
- Good	31,600	-	-	31,600
Unrecognised gross amount	**36,860**	**-**	**-**	**36,860**
Provision for financial guarantees	**(81)**	**-**	**-**	**(81)**
Loan commitments				
- Excellent	9,319	-	-	9,319
- Good	51,267	-	-	51,267
- Satisfactory	-	9,590	-	9,590
- Special monitoring	-	48	-	48
- Default	-	-	864	864
Unrecognised gross amount	**60,586**	**9,638**	**864**	**71,088**
Provision for loan commitments	**(142)**	**(16)**	**(58)**	**(216)**

33 Contingencies and Commitments (Continued)

Credit lines on clients which have fallen in stage 3 level at the reporting date and had unutilized credit lines by the end of the date were also assigned of the same stage, but are not entitled to draw these amounts while in default.

Refer to Note 31 for the description of credit risk grading system used by the Group and the approach to ECL measurement, including the definition of default and SICR as applicable to credit related commitments.

The total outstanding contractual amount of undrawn credit lines, letters of credit, and guarantees does not necessarily represent future cash requirements, as these financial instruments may expire or terminate without being funded. The fair value of credit related commitments was GEL 808 thousand at 31 December 2021 (2020: GEL 403 thousand).

Performance guarantees. Performance guarantees are contracts that provide compensation if another party fails to perform a contractual obligation. Such contracts do not transfer credit risk. The risk under performance guarantee contracts is the possibility that the insured event (i.e. the failure to perform the contractual obligation by another party) occurs. The key risks the Group faces are significant fluctuations in the frequency and severity of payments incurred on such contracts relative to expectations. The Group uses historical data and statistical techniques to predict levels of such payments. Claims must be made before the contract matures and most claims are settled within short term. This allows the Group to achieve a high degree of certainty about the estimated payments and therefore future cash flows. The Group manages such risks by constantly monitoring the level of payments for such products and has the ability to adjust its fees in the future to reflect any change in claim payments experience. The Group has a claim payment requests handling process which includes the right to review the claim and reject fraudulent or non-compliant requests.

The exposure and concentration of performance guarantees expressed at the amounts guaranteed is as follows:

In thousands of Georgian Lari	Note	December 31, 2021	December 31, 2020
Construction		18,761	16,591
Financial Institutions		11,274	600
Energy		4,383	4,730
Trade		2,041	481
Real Estate Management and Develoment		891	1,532
Service		137	940
Other		1,185	2,839
Total guaranteed amounts		**38,672**	**27,712**

Movements in provisions for performance guarantees are as follows:

In thousands of Georgian Lari	Note	December 31, 2021	December 31, 2020
Carrying amount at 1 January		**(232)**	**(291)**
Initial recognition of issued performance guarantees		(18)	(156)
Utilisation of provision		41	228
FX movements		9	(13)
Carrying amount at 31 December		**(200)**	**(232)**

33 Contingencies and Commitments (Continued)

Assets pledged and restricted. The Group had assets pledged as collateral with the following carrying value:

In thousands of Georgian Lari	Notes	December 31, 2021 Asset pledged	December 31, 2021 Related liability	December 31, 2020 Asset pledged	December 31, 2020 Related liability
Investments in debt securities at FVOCI	10, 17	29,814	28,306	23,455	21,957
Investments in debt securities at AC	10, 21	92,187	85,879	215,203	200,052
Mortgage Loan portfolio pledged with NBG		62,395	49,815	64,390	51,566
SME Loan portfolio pledged with NBG		39,306	39,000	19,017	18,900
Total		**223,702**	**203,000**	**322,065**	**292,475**

At 31 December 2021, restricted cash balances are balances of GEL 155 thousand (2020: GEL 164 thousand) are placed as a cover for international payment cards transactions. In addition, mandatory cash balances with the NBG of GEL 177,965 thousand (2020: GEL 198,239 thousand) represent mandatory reserve deposits which are not available to finance the Bank's day to day operations, as disclosed in Note 8.

34 Offsetting Financial Assets and Financial Liabilities

At 31 December 2021 and 31 December 2020 no financial instruments subject to offsetting, enforceable master netting and similar arrangements are presented.

35 Fair Value Disclosures

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

Financial assets and liabilities recorded or disclosed at fair value in the consolidated and separate statement of financial position at 31 December 2021 were classified in their entirety based on the lowest level of input that is significant to the asset or liability’s fair value measurement.

35 Fair Value Disclosures (continued)

(a) Recurring fair value measurements

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

	31 December, 2021				31 December, 2020			
In thousands of Georgian Lari	**Level 1**	**Level 2**	**Level 3**	**Total**	**Level 1**	**Level 2**	**Level 3**	**Total**
ASSETS AT FAIR VALUE								
FINANCIAL ASSETS								
Investments in debt securities								
- Georgian government bonds	-	39,185	-	39,185	-	23,914	-	23,914
	-	-						
NON-FINANCIAL ASSETS	-	-						
- Premises and equipment	-	-	21,246	21,246	-	-	22,447	22,447
TOTAL ASSETS WITH RECURRING FAIR VALUE MEASUREMENTS	**-**	**39,185**	**21,246**	**60,431**	**-**	**23,914**	**22,447**	**46,361**

The valuation technique, inputs used in the fair value measurement for level 3 measurements and related sensitivity to reasonably possible changes in those inputs at 31 December 2021 and 31 December 2020 are as follows:

	Fair value at 31 December				
In thousands of Georgian Lari	**2021**	**2020**	**Valuation technique**	**Inputs used**	**Range of inputs (weighted average)**
ASSETS AT FAIR VALUE					
NON-FINANCIAL ASSETS					
- Premises	26,494	22,448	Market comparable assets	Price per square meter	Commercial area 11,271 Office area 2,505-11,754 Garage 1,239-1,651
TOTAL RECURRING FAIR VALUE MEASUREMENTS AT LEVEL 3	**26,494**	**22,448**			

35 Fair Value Disclosures (Continued)

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

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

	31 December, 2021				31 December, 2020			
In thousands of Georgian Lari	Level 1 fair value	Level 2 fair value	Level 3 fair value	Carrying value	Level 1 fair value	Level 2 fair value	Level 3 fair value	Carrying value
ASSETS								
Cash and cash equivalents								
- Cash on hand	33,317	-	-	33,317	42,705	-	-	42,705
- Cash balances with the NBG	-	51,404	-	51,404	-	195,090	-	195,090
- Correspondent accounts and overnight placements	-	106,689	-	106,689	-	91,427	-	91,427
- Placements with other banks with original maturities of less than three months	-	383	-	383	-	75,867	-	75,867
Due from other banks								
- Short-term placements with other banks with original maturities of more than three months	-	12,899	-	12,899	-	13,424	-	13,424
Mandatory balances with the NBG	-	177,579	-	177,579	-	198,238	-	198,238
Loans and advances to customers at AC								
- Corporate loans	-	-	1,006,623	998,332	-	-	907,250	863,913
- Mortgage loans	-	-	189,888	172,011	-	-	157,318	150,565
- Consumer loans	-	-	64,982	67,322	-	-	61,563	57,935
- Credit cards	-	-	2,071	2,068	-	-	3,184	2,840
***Finance* lease**	-	-	9,036	9,036	-	-	5,108	5,108
Investments in debt securities								
- Georgian government treasury bonds	-	140,696		142,461	-	203,667		202,528
- Georgian government treasury bills	-	11,000		10,748	-	28,215		28,166
- Corporate bonds	-	-	18,770	18,305	-		34,545	31,071
Insurance assets	-	11,817	-	11,817	-	5,846	-	5,846
Other financial assets	-	1,356	-	1,356	-	1,336	-	1,336
NON-FINANCIAL ASSETS								
- Investment properties					-	-	1,203	583
TOTAL	**33,317**	**513,823**	**1,291,370**	**1,815,725**	**42,705**	**813,111**	**1,170,171**	**1,966,642**

35 Fair Value Disclosures (Continued)

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

	31 December, 2021				31 December, 2020			
In thousands of Georgian Lari	**Level 1 fair value**	**Level 2 fair value**	**Level 3 fair value**	**Carrying value**	**Level 1 fair value**	**Level 2 fair value**	**Level 3 fair value**	**Carrying Value**
FINANCIAL LIABILITIES								
Due to other banks								
- Correspondent accounts and overnight placements of other banks	-	1	-	1	-	1	-	1
- Short-term placements of other banks	-	19,707		19,707		40,233	-	40,233
- Short-term loans of NBG		203,123		203,123		263,929		263,929
Customer accounts								
- Current/settlement accounts of state and public organisations	-	53,542	-	53,542	-	135,576	-	135,576
- Term deposits of state and public organisations	-	-	101,717	91,963	-	-	106,580	96,406
- Current/settlement accounts of other legal entities	-	245,970	-	245,970	-	213,718	-	213,718
- Term deposits of other legal entities	-	-	90,653	88,987	-	-	137,813	137,249
- Current/demand accounts of individuals	-	172,501		172,501	-	139,447	-	139,447
- Term deposits of individuals	-		236,617	227,216	-	-	222,050	216,319
Borrowed funds								
- Borrowings from International Financial institutions	-	454,633	-	429,490	-	506,674	-	477,012
Insurance Liabilities	-	11,559		11,559		6,119	-	6,119
Lease Liabilities	-	4,745	-	4,745	-	4,812	-	4,812
Other financial liabilities	-	3,131		3,131	-	6,302	-	6,302
Subordinated debt								
- Subordinated debt	-	19,959	-	15,562	-	22,237	-	16,368
TOTAL	-	**1,188,871**	**428,987**	**1,567,497**	-	**1,339,048**	**466,443**	**1,753,491**

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

Liabilities were discounted at the Group's own incremental borrowing rate. Liabilities due on demand were discounted from the first date that the amount could be required to be paid by the Group. The Group's liabilities to its customers are subject to state deposit insurance scheme as described in Note 1. The fair value of these liabilities reflects these credit enhancements.

36 Related Party Transactions

Parties are generally considered to be related if the parties are under common control, or one party has the ability to control the other party or can exercise significant influence over the other party in making financial or operational decisions. In considering each possible related party relationship, attention is directed to the substance of the relationship, not merely the legal form.
Included in “Investments in subsidiary” under Separate Statement of Financial Position of the Bank are the investments in following entities:

In thousands of Georgian Lari		2021		2020	
Name	**Principal activities**	**Investment**	**Accumulated Profit/(loss)**	**Investment**	**Accumulated Profit/(loss)**
Basis Asset Management – Holding LLC	Asset management	3,797	(54)	3,797	(26)
BB Insurance JSC	Insurance	6,000	1,388	6,000	1,279
BB Leasing JSC	Leasing	11,000	1,147	11,000	961
Total		**20,797**	**2,481**	**20,797**	**2,214**

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

In thousands of Georgian Lari	**Ultimate share-holder**	**Signifcant share-holders**	**Immediate parent company**	**Supervisory Board**	**Manage-ment Board**	**Companies under common control**	**Other related parties**
Loans and advances to customers (contractual interest rate: 4% –16.5%)	-	1	-	27	2,014	6,020	361
Credit loss allowance at 31 December 2021	-	-	-	-	(4)	(13)	(2)
Customer accounts (contractual interest rate: 1% – 14.5%)	482	2,097	2,460	2,354	6,682	49,989	1,753
Provisions for liabilities and charges	-	-	-	1	3	-	-
Subordinated debt (contractual interest rate: 7%)		-	15,562	-	-	-	-

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

In thousands of Georgian Lari	**Ultimate share-holder**	**Signifcant share-holders**	**Immediate parent company**	**Supervisory Board**	**Manage-ment Board**	**Companies under common control**	**Other related parties**
Interest income	-	32	-	4	159	871	39
Interest expense	-38	-69	-42	-60	-315	-660	-94
Credit loss allowance	-	2	-	-	6	137	2
Gains less losses from trading in foreign currencies	-	3	-	-	3	227	2
Foreign exchange translation gains less losses	-	94	968	69	147	1,146	85
Provision for credit related commitments	-1	-	-	-1	-5	-	-1
Administrative and other operating expenses	-	-	-	-	-	-	39

36 Related Party Transactions (Continued)

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

In thousands of Georgian Lari	Ultimate share-holder	Signifcant share-holders	Immediate parent company	Super-visory Board	Manage-ment Board	Compa-nies under common control	Other related parties
Undrawn credit line commitments	-	49	-	115	1,032	174	12

Aggregate amounts lent to and repaid by related parties during 2021 were:

In thousands of Georgian Lari	Ultimate share-holder	Signifcant share-holders	Immediate parent company	Super-visory Board	Manage-ment Board	Compa-nies under common control	Other related parties
Amounts lent to related parties during the year	-	720	-	-	3,265	9,903	430

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

In thousands of Georgian Lari	Ultimate shareholder	Signifcant share-holders	Immediate parent company	Supervisory Board	Manage-ment Board	Companies under common control	Other related parties
Loans and advances to customers (contractual interest rate: 4% – 16%)	-	559	-	29	1,211	12,843	463
Credit loss allowance at 31 December 2020	-	-	-	-	(2)	(15)	(1)
Customer accounts (contractual interest rate: 2% – 12%)	444	1,918	1,514	1,451	5,932	47,618	1,552
Provisions for liabilities and charges	1	-	-	1	5	-	1
Subordinated debt (contractual interest rate: 7%)		-	16,368	-	-	-	-

36 Related Party Transactions (Continued)

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

In thousands of Georgian Lari	Ultimate share-holder	Signifcant share-holders	Immediate parent company	Supervisory Board	Manage-ment Board	Companies under common control	Other related parties
Interest income	1	21	-	4	69	812	35
Interest expense	(24)	(67)	(166)	(35)	(224)	(1,244)	(67)
Credit loss allowance	-	(1)	-	(1)	7	(160)	3
Gains less losses from trading in foreign currencies	-	4	12	2	(4)	379	2
Foreign exchange translation gains less losses	2	(73)	(685)	(39)	(5)	(2,643)	(25)
Provision for credit related commitments	(1)	-	-	(1)	(5)	-	(1)
Administrative and other operating expenses	-	-	-	-	-	-	88

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

In thousands of Georgian Lari	Ultimate share-holder	Signifcant share-holders	Immediate parent company	Super-visory Board	Manage-ment Board	Compa-nies under common control	Other related parties
Performance Guarantees issued by the Group at the year end	-	-	-	-	-	676	-
Financial Guarantees issued by the Group at the year end	-	-	-	-	-	2,047	-
Undrawn credit line commitments	50	38	-	111	1,491	281	103

Aggregate amounts lent to and repaid by related parties during 2020 were:

In thousands of Georgian Lari	Ultimate share-holder	Signifcant share-holders	Immediate parent company	Super-visory Board	Manage-ment Board	Compa-nies under common control	Other related parties
Amounts lent to related parties during the year	-	145	-	185	2,183	11,442	166
Amounts repaid by related parties during the year	-	826	-	479	2,295	10,074	209

A person is considered as related party only if he/she has control or joint control or significant influence over the Bank or the Group, is a member of Top Management of the Group or its parent entity.

36 Related Party Transactions (Continued)

Legal Entity is considered to be a related party if the following conditions are met: The entity and the reporting entity are members of the same group (which means that each parent, subsidiary and fellow subsidiary is related to the others). One entity is an associate or joint venture of the other entity (or an associate or joint venture of a member of a group of which the other entity is a member); The enterprise is subject of control or joint control of the following natural persons: person having control or significant influence over the Bank; Member of Top Management of the Bank, The Group or its parent Company, as well

as their family members. Other related parties include companies under control of the Bank and/or family member of persons who are considered as related party and have right significant influence over the bank or the Group.

Compensation for the members of the Supervisory Board is presented below:

	2021		2020	
In thousands of Georgian Lari	**Expense**	**Accrued liability**	**Expense**	**Accrued liability**
Short-term benefits:				
- Salaries	618	-	494	-
Total	**618**	-	**494**	-

Key management compensation is presented below:

	2021		2020	
In thousands of Georgian Lari	**Expense**	**Accrued liability**	**Expense**	**Accrued liability**
Short-term benefits:				
- Salaries	1,778	-	1,413	-
- Short-term bonuses	3,075	1,655	749	-
Share-based compensation:				
- Equity-settled share-based compensation	597	-	20	-
Total	**5,450**	**1,655**	**2,182**	-

Short-term bonuses fall due wholly within twelve months after the end of the period in which management rendered the related services. Key management personnel includes management board members.

37 Events after the reporting period

Russia-Ukraine War. On 21 February 2022, the President of Russia signed the executive orders on the recognition of the Donetsk People's Republic and the Lugansk People's Republic. On 24 February 2022, a decision to carry out a special military operation in Ukraine was announced. Subsequent to these events, the US, UK, EU and other countries announced an extension of sanctions on certain Russian officials, businessmen and companies. These developments may result in reduced access of the Russian businesses to international capital and export markets, weakening of the Russian Ruble, decline in capitals markets and other negative economic consequences.

The two major sectors of Georgian economy, wine production and tourism industry, are heavily dependent on the Russian market: accrding to market analysts' assessment, approximately half of the exported Georgian wine in 2021 were to Russia, the second largest being Ukraine; in the tourism sector, Russia and Ukraine also account for significant portion of travelers.

The Bank has good sectoral diversification and Herfindahl-Hirschman Index (HHI): Exposure to Wine Production sector makes 3.4% and HoReCa 11.7% of the total loan portfolio, whereby Hotels business accounts for 78% of the HoReCa exposure. HoReCa Portfolio itself is well diversified between geographic regions and segments. In many cases loans are issued to groups with major other source of incomes unrelated to tourism. During 2021 the Bank has reviewed individually all significant borrower groups in HoReCa business to assess long-lasting effects of the Covid pandemic. The most of these borrowers are already classified in increased credit risk or default cathegory, therefore no major deterioration of the portfolio quality in these sectors is expected. Only 22% wine exporters in portfolio are dependent on Russia-Ukrainian market, other borrowers diversified their markets of sales.

JSC Basibank acquired retail portfolio in loans and customer deposits. On February 27, 2022, Basisbank announced its decision to acquire JSC VTB Bank Georgia's retail business, which includes individuals deposits, current accounts and retail loan portfolio (including mortgages and consumer, auto loans). This is a strong acquisition which will increase the Bank's assets by 35% up to 2.5 billion GEL, positioning Basisbank as one of the top 4 largest Bank on the Georgian market. After the US, UK and EU countries have imposed sanctions on some Russian banks due to Russia's aggressive military activities in Ukraine, JSC VTB Bank Georgia's, a subsidiary of Russian VTB Bank, was affected by the restrictions and is no longer able to carry out transactions in USD, Euro and other foreign currencies as well as to provide full-fledged services to its customers. For now, VTB Bank (Georgia) maintains its business portfolio and continues servicing its business clients. All Georgian banks irrespective of ownership are subject to Georgian legislation and the transparency of their operations as well as customer base are in full compliance with the requirements and rules set by the National Bank of Georgia. Basisbank has full support from National Bank of Georgia in the process of the stated retail business acquisition. Protecting the interests of Georgian depositor clients is one of the main priorities under its mandate.

The table below summarises the gross carrying amounts and credit loss allowance amounts of the acquired loan portfolio from VTB Bank Georgia as at 31 January 2022. The portfolio information is unaudited, provided by VTB Bank Georgia.

In thousands of	**Gross carrying amount**			**ECL**			**Carrying Value**		
Georgian Lari	**Stage 1**	**Stage 2**	**Stage 3**	**Stage 1**	**Stage 2**	**Stage 3**	**Stage 1**	**Stage 2**	**Stage 3**
Mortgage Loans	365,558	15,527	2,180	(731)	(362)	(524)	364,827	15,165	1,656
Consumer Loans	168,518	9,742	20,642	(3,519)	(1,557)	(17,845)	164,999	8,185	2,797
Credit Cards	36,650	537	3,584	(828)	(202)	(3,261)	35,822	335	323
Total	**570,726**	**25,806**	**26,406**	**(5,078)**	**(2,121)**	**(21,630)**	**565,648**	**23,685**	**4,776**

37 Events after the reporting period (Continued)

Analysis by credit quality of loans to standard lending as at January 31, 2022 is presented as follows:

In thousands of Georgian Lari	Not past due	Up to 30 days overdue	31 to 90 days overdue	91 to 180 days overdue	Over 180 days overdue	Total
Mortgage Loans	365,222	11,355	3,508	1,116	448	**381,649**
Consumer Loans	167,383	4,331	1,649	723	1,896	**175,982**
Credit Cards	35,318	505	333	90	232	**36,478**
Total	**567,923**	**16,191**	**5,490**	**1,929**	**2,576**	**594,109**

Individual customer accounts as at January 31, 2022 is presented as follows:

In thousands of Georgian Lari	**January 31, 2022**
Individuals	
- Current/demand accounts	93,738
- Term deposits	442,673
Total customer accounts	**536,411**

38 Abbreviations

The list of the abbreviations used in these consolidated financial statements is provided below:

Abbreviation	Full name
AC	Amortised Cost
CCF	Credit Conversion Factor
EAD	Exposure at Default
ECL	Expected Credit Loss
EIR	Effective interest rate
FVOCI	Fair Value through Other Comprehensive Income
FVTPL	Fair Value Through Profit or Loss
FX, Forex	Foreign Currency Exchange
IFRS	International Financial Reporting Standard
IRB system	Internal Risk-Based system
L&R	Loans and Receivables
LGD	Loss Given Default
LTV	Loan to Value
PD	Probability of Default
POCI financial assets	Purchased or Originated Credit-Impaired financial assets
ROU asset	Right of use asset
SICR	Significant Increase in Credit Risk
SME	Small and Medium-sized Enterprises
SPPI	Solely Payments of Principal and Interest
SPPI test	Assessment whether the financial instruments' cash flows represent Solely Payments of Principal and Interest

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