**Consolidated Financial Statements and**

**Independent Auditor’s Report**

**[ABC Bank Group]**

**31 December 2024**

**CONTENTS**

Independent Auditor’s Report

**Consolidated Financial Statements**

Consolidated Statement of Financial Position 1

Consolidated Statement of Profit or Loss and Other Comprehensive Income 2

Consolidated Statement of Changes in Equity 4

Consolidated Statement of Cash Flows 7

**Notes to the Consolidated Financial Statements**

[1 Introduction 9](#_Toc179196003)

[2 Operating Environment of the Group 9](#_Toc179196004)

[3 Basis of Preparation 11](#_Toc179196005)

[4 Sources of Estimation Uncertainty and Judgements in Applying Accounting Policies 14](#_Toc179196006)

[5 Adoption of New or Revised Standards and Interpretations 25](#_Toc179196007)

[6 New Accounting Pronouncements 25](#_Toc179196008)

[7 Cash and Cash Equivalents 27](#_Toc179196009)

[8 Due from Other Banks 30](#_Toc179196010)

[9 Investments in Debt Securities 38](#_Toc179196011)

[10 Investments in Equity Securities 53](#_Toc179196012)

[11 Loans and Advances to Customers 54](#_Toc179196013)

[12 Repurchase Receivables 80](#_Toc179196014)

[13 Investment Properties 94](#_Toc179196015)

[14 Investment in Associates 96](#_Toc179196016)

[15 Other Financial Assets 99](#_Toc179196017)

[16 Other Assets 108](#_Toc179196018)

[17 Goodwill 109](#_Toc179196019)

[18 Premises, Equipment and Intangible Assets 112](#_Toc179196020)

[19 Right-of-use Assets and Lease Liabilities 117](#_Toc179196021)

[20 Non-Current Assets Classified as Held for Sale (or Disposal Groups) 119](#_Toc179196022)

[21 Due to Other Banks 122](#_Toc179196023)

[22 Customer Accounts 123](#_Toc179196024)

[23 Debt Securities in Issue [Promissory Notes Issued] 124](#_Toc179196025)

[24 Other Borrowed Funds 125](#_Toc179196026)

[25 Provisions for Liabilities and Charges 127](#_Toc179196027)

[26 Other Financial Liabilities 128](#_Toc179196028)

[27 Other Liabilities 133](#_Toc179196029)

[28 Subordinated Debt 133](#_Toc179196030)

[29 Share Capital 133](#_Toc179196031)

[30 Perpetual Bonds 135](#_Toc179196032)

[31 Other Comprehensive Income Recognised in Each Component of Equity 136](#_Toc179196033)

[32 Interest Income and Expense 139](#_Toc179196034)

[33 Fee and Commission Income and Expense 141](#_Toc179196035)

[34 Other Operating Income 143](#_Toc179196036)

[35 Administrative and Other Operating Expenses 144](#_Toc179196037)

[36 Income Taxes 145](#_Toc179196038)

[37 Dividends 149](#_Toc179196039)

[38 Reconciliation of Liabilities Arising from Financing Activities 150](#_Toc179196040)

[39 Earnings [Loss] per Share 150](#_Toc179196041)

[40 Segment Analysis 151](#_Toc179196042)

[41 Financial Risk Management 161](#_Toc179196043)

[42 Management of Capital 180](#_Toc179196044)

[43 Contingencies and Commitments 181](#_Toc179196045)

[44 Offsetting Financial Assets and Financial Liabilities 188](#_Toc179196046)

[45 Non-Controlling Interest 190](#_Toc179196047)

[46 Interests in Structured Entities 191](#_Toc179196048)

[47 Transfers of Financial Assets 193](#_Toc179196049)

[48 Derivative Financial Instruments 203](#_Toc179196050)

[49 Fair Value Disclosures 205](#_Toc179196051)

[50 Presentation of Financial Instruments by Measurement Category 220](#_Toc179196052)

[51 Related Party Transactions 223](#_Toc179196053)

[52 Business Combinations 232](#_Toc179196054)

[53 Events after the End of the Reporting Period 234](#_Toc179196055)

[54 Abbreviations 238](#_Toc179196056)

| *In thousands of EUR* | **Note** | **31 December**  **2024** | **31 December**  **2023** |
| --- | --- | --- | --- |
|  |  |  |  |
| **ASSETS** |  |  |  |
| Cash and cash equivalents | 7 |  |  |
| Mandatory cash balances with the National Bank of [Country] |  |  |  |
| Due from other banks | 8 |  |  |
| Investments in debt securities | 9 |  |  |
| Investments in equity securities | 10 |  |  |
| Loans and advances to customers | 11 |  |  |
| Repurchase receivables | 12 |  |  |
| Investment properties | 13 |  |  |
| Investment in associates | 14 |  |  |
| Current income tax prepayment | 36 |  |  |
| Other financial assets | [15](#_heading=h.2bn6wsx) |  |  |
| Other assets | [16](#_heading=h.qsh70q) |  |  |
| Deferred income tax asset | 36 |  |  |
| Goodwill | 17 |  |  |
| Premises and equipment | 18 |  |  |
| Intangible assets | 18 |  |  |
| Right of use assets | 19 |  |  |
| Non-current assets held for sale (or disposal groups) | 20 |  |  |
|  |  |  |  |
| **TOTAL ASSETS** |  |  |  |
|  |  |  |  |
| **LIABILITIES** |  |  |  |
| Due to other banks | 21 |  |  |
| Customer accounts | 22 |  |  |
| Debt securities in issue [Promissory notes issued] | 23 |  |  |
| Other borrowed funds | [24](#_heading=h.32hioqz) |  |  |
| Lease liabilities2 | 19 |  |  |
| Other financial liabilities | [26](#_heading=h.vx1227) |  |  |
| Current income tax liability | [36](#_heading=h.2lwamvv) |  |  |
| Deferred income tax liability | [36](#_heading=h.2lwamvv) |  |  |
| Provisions for liabilities and charges | [25](#_heading=h.41mghml) |  |  |
| Other liabilities | [27](#_heading=h.1v1yuxt) |  |  |
| Subordinated debt | [28](#_heading=h.4f1mdlm) |  |  |
| Liabilities directly associated with disposal groups held for sale | 20 |  |  |
|  |  |  |  |
| **TOTAL LIABILITIES** |  |  |  |
|  |  |  |  |
| **EQUITY** |  |  |  |
| Share capital | [29](#_heading=h.2u6wntf) |  |  |
| Retained earnings [Accumulated deficit] |  |  |  |
| Other reserves | [31](#_heading=h.3tbugp1) |  |  |
|  |  |  |  |
|  |  |  |  |
| **Net assets attributable to the Bank’s owners** |  |  |  |
| **Non-controlling interest** | 45 |  |  |
|  |  |  |  |
| **TOTAL EQUITY** |  |  |  |
|  |  |  |  |
| **TOTAL LIABILITIES AND EQUITY** |  |  |  |

Approved for issue and signed [on behalf of Management Board] on \_\_\_\_\_\_\_\_\_\_ 2025.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(name) (name)

President Chief Accountant

| *In thousands of EUR* | **Note** | **2024** | **2023**  **[(restated)]** |
| --- | --- | --- | --- |
|  |  |  |  |
| Interest income calculated using the effective interest method | 32 |  |  |
| Other similar income | 32 |  |  |
| Interest expense | 32 |  |  |
| Other similar expense | 32 |  |  |
|  |  |  |  |
|  |  |  |  |
| **Net margin on interest and similar income** |  |  |  |
| Credit loss allowance for assets carried at amortised cost\* |  |  |  |
| Credit loss allowance for debt securities at fair value through other comprehensive income |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Net margin on interest and similar income after credit loss allowance** |  |  |  |
|  |  |  |  |
| Fee and commission income | [33](#_heading=h.nmf14n) |  |  |
| Fee and commission expense | [33](#_heading=h.nmf14n) |  |  |
| Gains less losses on derecognition of financial assets measured at amortised cost |  |  |  |
| Gains less losses from modification of financial assets measured at amortised cost, that did not lead to derecognition |  |  |  |
| Gains less losses from [securities] [financial assets] at fair value through profit or loss |  |  |  |
| Gains less losses from financial derivatives |  |  |  |
| Gains less losses from trading in foreign currencies |  |  |  |
| Gains less losses on revaluation of investment properties | 13 |  |  |
| Foreign exchange translation gains less losses |  |  |  |
| Provision for credit related commitments |  |  |  |
| Gains less losses from reclassification of financial assets from amortised cost to financial assets at fair value through profit or loss |  |  |  |
| Gains less losses from reclassification of debt instruments at fair value through other comprehensive income to debt instruments at fair value through profit or loss |  |  |  |
| Other operating income | [34](#_heading=h.1mrcu09) |  |  |
| Gains/(losses) arising from early retirement of debt |  |  |  |
| Sale of assets previously leased to customers |  |  |  |
| Cost of assets sold and previously leased to customers |  |  |  |
| Administrative and other operating expenses | [35](#_heading=h.46r0co2) |  |  |
| Share of result of associates | 14 |  |  |
|  |  |  |  |
|  |  |  |  |
| **Profit/(loss) before tax** |  |  |  |
| Income tax (expense)/credit | [36](#_heading=h.2lwamvv) |  |  |
|  |  |  |  |
|  |  |  |  |
| **PROFIT/(LOSS) FOR THE YEAR** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Other comprehensive income / (loss):** |  |  |  |
|  |  |  |  |
| *Items that may be reclassified subsequently to profit or loss:* |  |  |  |
|  |  |  |  |
| Debt securities at fair value through other comprehensive income: | 9,12 |  |  |
| - Gains less losses arising during the year |  |  |  |
| - Gains less losses reclassified to profit or loss upon disposal |  |  |  |
| Translation of financial information of foreign operations to presentation currency |  |  |  |
| Share of other comprehensive income of associates | 14 |  |  |
| Income tax recorded directly in other comprehensive income | [36](#_heading=h.2lwamvv) |  |  |
|  |  |  |  |
| *Items that will not be reclassified to profit or loss:* |  |  |  |
|  |  |  |  |
| Gains less losses on investments in equity securities at fair value through other comprehensive income |  |  |  |
| Change in fair value attributable to change in the credit risk of financial liabilities designated at fair value through profit or loss | [24,26] |  |  |
| Revaluation of premises and equipment | 18 |  |  |
| Remeasurements of post-employment defined benefit obligations |  |  |  |
| Share of other comprehensive income of associates | 14 |  |  |
| Income tax recorded directly in other comprehensive income | [36](#_heading=h.2lwamvv) |  |  |
|  |  |  |  |
|  |  |  |  |
| **Other comprehensive income / (loss)** **for the year** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **TOTAL COMPREHENSIVE INCOME / (LOSS) FOR THE YEAR** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Profit/(loss) is attributable to:** |  |  |  |
| - Owners of the Bank |  |  |  |
| - Non-controlling interest |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Profit/(loss) for the year** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total comprehensive income /(loss) is attributable to:** |  |  |  |
| - Owners of the Bank |  |  |  |
| - Non-controlling interest |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total comprehensive income / (loss) for the year** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Earnings [Loss] per share for profit [loss] attributable to the owners of the Bank,** **basic and diluted** (expressed in EUR per share) | [39](#_heading=h.206ipza) |  |  |
|  |  |  |  |

|  |  | **Attributable to owners of the Bank** | | | | | | | | | **Non-con-troll-ing**  **Inte-rest** | **Total**  **equity** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **Share**  **ca-pital** | **Share pre-mium** | **[Perpe-tual bonds]** | **Reva-luation reserve for secu-rities at FVOCI** | **Reva-luation of financial liabilities attri-butable to own credit risk** | **Reva-luation reserve for pre-mises** | **Cur-rency trans-lation reserve** | **Re-tained**  **ear-nings [Accu-mulated deficit]** | **Total** |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| **Balance at 1 January 2023** |  |  |  |  |  |  |  |  |  |  |  |  |
| Voluntary changes in accounting policies | **3** |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| **Balance at 1 January 2023 (restated)** |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| Profit / (loss) for the year |  |  |  |  |  |  |  |  |  |  |  |  |
| Other comprehensive income | 31 |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| Total comprehensive income for 2023 |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| Share issue | [29](#_heading=h.2u6wntf) |  |  |  |  |  |  |  |  |  |  |  |
| Treasury shares: |  |  |  |  |  |  |  |  |  |  |  |  |
| - Acquisitions | [29](#_heading=h.2u6wntf) |  |  |  |  |  |  |  |  |  |  |  |
| - Disposals | [29](#_heading=h.2u6wntf) |  |  |  |  |  |  |  |  |  |  |  |
| Business combinations | 52 |  |  |  |  |  |  |  |  |  |  |  |
| Acquisition of non-controlling interest in subsidiaries |  |  |  |  |  |  |  |  |  |  |  |  |
| Disposal of non-controlling interest in subsidiaries |  |  |  |  |  |  |  |  |  |  |  |  |
| Transfer of revaluation surplus on premises [and equipment] to retained earnings | 31 |  |  |  |  |  |  |  |  |  |  |  |
| Dividends declared | 37 |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| **Balance at 31 December 2023** |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| Effects of adoption of new or revised standards | 5 |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| **Restated balance at 1 January 2024** |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| Profit / (loss) for the year |  |  |  |  |  |  |  |  |  |  |  |  |
| Other comprehensive income | 31 |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| Total comprehensive income for 2024 |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| Share issue | 29 |  |  |  |  |  |  |  |  |  |  |  |
| Treasury shares |  |  |  |  |  |  |  |  |  |  |  |  |
| - Acquisitions | 29 |  |  |  |  |  |  |  |  |  |  |  |
| - Disposals | 29 |  |  |  |  |  |  |  |  |  |  |  |
| Business combinations | 52 |  |  |  |  |  |  |  |  |  |  |  |
| Acquisition of non-controlling interest in subsidiaries |  |  |  |  |  |  |  |  |  |  |  |  |
| Disposal of non-controlling interest in subsidiaries |  |  |  |  |  |  |  |  |  |  |  |  |
| Transfer of revaluation surplus on premises [and equipment] to retained earnings | [31](#_heading=h.3tbugp1) |  |  |  |  |  |  |  |  |  |  |  |
| Transfer of revaluation reserve on investments in equity securities at FVOCI to retained earnings upon disposal |  |  |  |  |  |  |  |  |  |  |  |  |
| Transfer of change in fair value attributable to change in the credit risk of financial liabilities at FVTPL to retained earnings |  |  |  |  |  |  |  |  |  |  |  |  |
| Dividends declared | [37](#_heading=h.111kx3o) |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| **Balance at 31 December 2024** |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |

| *In thousands of EUR* | **Note** | **2024** | **2023** |
| --- | --- | --- | --- |
|  |  |  |  |
| **Cash flows from operating activities** |  |  |  |
| Interest income received, excluding interest income on investments in debt securities |  |  |  |
| Interest income received on investments at fair value through profit or loss |  |  |  |
| Interest paid |  |  |  |
| Other similar income paid |  |  |  |
| Fees and commissions received |  |  |  |
| Fees and commissions paid |  |  |  |
| Income received from trading in trading securities |  |  |  |
| Income received from financial derivatives |  |  |  |
| Income received from trading in foreign currencies |  |  |  |
| Other operating income received |  |  |  |
| Proceeds from sale of assets previously leased to customers |  |  |  |
| Staff costs paid |  |  |  |
| Administrative and other operating expenses paid |  |  |  |
| Income tax paid |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Cash flows from/(used in) operating activities before changes in operating assets and liabilities** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| *Net (increase)/decrease in:* |  |  |  |
| - investments in debt securities at fair value through profit or loss |  |  | - |
| - investments in equity securities at fair value through profit or loss |  |  | - |
| - due from other banks |  |  |  |
| - loans and advances to customers |  |  |  |
| - repurchase receivables |  |  |  |
| - other financial assets |  |  |  |
| - other assets |  |  |  |
|  |  |  |  |
| *Net increase/(decrease) in:* |  |  |  |
| - due to other banks |  |  |  |
| - customer accounts |  |  |  |
| - debt securities in issue [promissory notes issued] |  |  |  |
| - other financial liabilities |  |  |  |
| - provisions for liabilities and charges and other liabilities |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Net cash from/(used in) operating activities** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Cash flows from investing activities** |  |  |  |
| Interest income received on investments in debt securities  Acquisition of debt securities at fair value through other comprehensive income | 9 |  | - |
| Acquisition of equity securities at fair value through other comprehensive income | 10 |  | - |
| Proceeds from disposal [and redemption] of debt securities at fair value through other comprehensive income | 9 |  | - |
| Proceeds from disposal of equity securities at fair value through other comprehensive income | 10 |  | - |
| Acquisition of investments in debt securities carried at amortised cost | 9 |  | - |
| Proceeds from redemption of debt securities carried at amortised cost | 9 |  | - |
| Acquisition of premises and equipment | 18 |  |  |
| Proceeds from disposal of premises and equipment | 18, 20 |  |  |
| Dividend income received |  |  |  |
| Acquisition of subsidiaries, net of cash acquired | [52](#_heading=h.kgcv8k) |  |  |
| Proceeds from disposal of subsidiary, net of disposed cash | 20, [52](#_heading=h.kgcv8k) |  |  |
| Acquisition of associates | 14 |  |  |
| Proceeds from disposal of associates | 14, 20 |  |  |
| Acquisition of investment properties | 13 |  |  |
| Proceeds from disposal of investment properties | 13, 20 |  |  |
| Acquisition of intangible assets | 18 |  |  |
| Proceeds from disposal of intangible assets | 18, 20 |  |  |
|  |  |  |  |
|  |  |  |  |
| **Net cash from/(used in) investing activities** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Cash flows from financing activities** |  |  |  |
| Proceeds from other borrowed funds | [24](#_heading=h.32hioqz) |  |  |
| Repayment of other borrowed funds | [24](#_heading=h.32hioqz) |  |  |
| Repayment of principal of lease liabilities |  |  |  |
| Proceeds from [syndicated] long term borrowings from other banks | [24](#_heading=h.32hioqz) |  |  |
| Repayment of [syndicated] long term borrowings from other banks | [24](#_heading=h.32hioqz) |  |  |
| Proceeds from subordinated debt | [28](#_heading=h.4f1mdlm) |  |  |
| Repayment of subordinated debt | [28](#_heading=h.4f1mdlm) |  |  |
| Issue of ordinary shares | [29](#_heading=h.2u6wntf) |  |  |
| Issue of preference shares | [29](#_heading=h.2u6wntf) |  |  |
| Capital contributions from shareholders other than through issuance of shares | [29](#_heading=h.2u6wntf) |  |  |
| Acquisition of treasury shares | [29](#_heading=h.2u6wntf) |  |  |
| Disposal of treasury shares | [29](#_heading=h.2u6wntf) |  |  |
| Acquisition of non-controlling interest in subsidiaries | 45 |  |  |
| Proceeds from disposal of non-controlling interest in subsidiaries | 45 |  |  |
| Dividends paid | [37](#_heading=h.111kx3o) |  |  |
| Discretionary interest on perpetual bonds paid | 37 |  |  |
| Proceeds from issue of perpetual bonds | 30 |  |  |
| Repayment of perpetual bonds | 30 |  |  |
| Capital distributions to shareholders other than dividends | 29 |  |  |
|  |  |  |  |
|  |  |  |  |
| **Net cash from/(used in) financing activities** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Effect of exchange rate changes on cash and cash equivalents** |  |  |  |
| **Effect of changes in expected credit losses on cash and cash equivalents** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Net increase/(decrease) in cash and cash equivalents** |  |  |  |
| Cash and cash equivalents at the beginning of the year |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Cash and cash equivalents at the end of the year** | 7 |  |  |
|  |  |  |  |

[Refer to Note 7 for investing and financing transactions that did not require the use of cash and cash equivalents and were excluded from the statement of cash flows.]

# Introduction

These [consolidated] financial statements have been prepared in accordance with International Financial Reporting Standards as issued by the IASB (“IFRS Accounting Standards”) for the year ended 31 December 2024 for ABC Bank (the “Bank”) and its subsidiaries (the “Group”).

The Bank was incorporated and is domiciled in [Country]. The Bank is a joint stock company *[or state the appropriate civil code classification]* limited by shares and was set up in accordance with [Country’s] regulations. [As of 31 December 2024 and 2023 the Bank’s immediate [and ultimate] parent company was \_\_\_\_\_, and the Bank was ultimately controlled by Mr \_\_\_\_\_.] *Tailor the above wording or include additional wording such that the Bank’s ultimate parent company is disclosed under IAS 1.138(c) and ultimate controlling party under IAS 24.13.]*

***Principal activity.*** The Group’s principal business activity is [commercial and retail]banking operations within [Country]. The Bank has operated under a full banking licence issued by the [National Bank of Country (“NBC”)] since *\_\_\_\_\_*. The Bank participates in the state deposit protection scheme. The [Deposit Protection Fund] guarantees repayment of 100% of individual deposits up to EUR 100 thousand per individual in the case of the withdrawal of a licence of a bank or a NBC imposed moratorium on payments.

The Bank has \_\_\_\_ (2023: \_\_\_\_) branches within the [Country] and \_\_\_\_ (2023: \_\_\_\_) branches overseas in \_\_\_\_. Additionally, the Bank has representative offices in \_\_\_\_\_. [The Group had \_\_\_\_\_ employees at 31 December 2024 (2023: \_\_\_\_\_ employees).]

***Registered address and place of business.*** The Bank’s registered address is: \_\_\_\_\_\_\_\_\_, [Country].

[The Bank’s principal place of business is \_\_\_\_ .]

***Presentation currency.*** These [consolidated] financial statements are presented in Euro ("EUR"), unless otherwise stated.

***Abbreviations.*** A glossary of various abbreviations used in this document is included in Note 54.

# Operating Environment of the Group

***War between Russia and Ukraine.*** The sanctions imposed by [Country] on Russia due to its military operations in the Ukraine and the related counter measures by Russia caused an increase in the price of natural gas and electricity and their higher volatility. The [Country] paid [x%] of its GDP (2023: [y%]) for energy imports, while this would amount to [z%] for 2024 at the price level observed as of 31 December 2021. The average price for natural gas in the European Union was approximately [5] times higher than in the USA (2023: approximately 5.24 times higher). This may lead to defaults among the Group’s customers operating in energy intensive sectors that compete on global markets. Macroeconomic assumptions underlying the expected loss allowance are disclosed in Note 4.

*[Add information about the war in Ukraine, including how the invasion and on-going war impact the Group’s operations and results for the reporting period. The note should be tailored to Group’s specific circumstances.*

2 Operating Environment of the Group (continued)

***Climate change*.** The Group is exposed to climate change risks. In respect of risks related to the climate change, the Group implemented the following key measures:

* The Group had incorporated climate risks in its stress testing process. An additional “Climate risk” scenario was incorporated in the internal stress testing methodology and will be regularly assessed and reported together with other applicable scenarios. *[If the Group was required to perform climate stress test by the regulator – please disclose this fact and provide additional details.]*
* The Group is incorporating climate-linked covenants and pricing mechanisms in newly originated loans. *[If such loans are material, consider disclosing (i) summary information about such products and (ii) how these exposures were assessed against the “solely payment of principal and interest” criterion in IFRS 9.]*
* Management believes that it is currently not possible to explicitly incorporate climate risk factors in the ECL measurement. Existing scenarios, forecasts, and estimates, including those used for stress-testing, are covering only the long-term horizon well beyond the maturity of the existing portfolios. Such scenarios are also high-level, and attribution to specific borrowers without additional data would be highly arbitrary. To address the information gap for detailed, borrower-specific data, the Group had developed a questionnaire to collect climate-related information from its borrowers. The Group is collecting information to perform a robust assessment of physical and transition risks specific of its borrowers. The Group is planning to enhance its credit risk scoring models to incorporate such information in the PD and LGD measurement [starting from 2025].
* The Group had developed an industry heatmap to assess its climate-related credit risk concentration on a sectoral basis, as presented in the table below:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *In thousands of EUR* | **2024** | | **2023** | |
| **Amount** | **%** | **Amount** | **%** |
|  |  |  |  |  |
| ***High climate risk sectors*** |  |  |  |  |
| Oil and gas |  |  |  |  |
| Mining |  |  |  |  |
| Real estate |  |  |  |  |
| Agricultural |  |  |  |  |
| *[Expand sectors as deemed necessary]* |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| Total high climate risk sectors |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| Trade |  |  |  |  |
| Manufacturing |  |  |  |  |
| Cities and municipalities |  |  |  |  |
| *[Expand sectors as deemed necessary]* |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| Total moderate climate risk sectors |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| Financial services |  |  |  |  |
| State and public organisations |  |  |  |  |
| Individuals |  |  |  |  |
| Other |  |  |  |  |
| *[Expand sectors as deemed necessary]* |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| Total low climate risk sectors |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Total loans and advances to customers carried at AC and at FVTPL** |  |  |  |  |
|  |  |  |  |  |

2 Operating Environment of the Group (continued)

[The Group further implemented additional risk-driven limits to manage its exposure and risk appetite to industries of high transition and/or physical risk.]

*[If the Group made public commitments, such as phasing out lending to coal-powered electricity generation, please explain the details of such commitments and the assessment of the consequences thereof.] [Please also disclose details around other sustainability-related risks and respective policies, if any.]*

The long-term effects of the current and future economic situation are difficult to assess and management’s current expectations and estimates could differ from the actual results.

For the purpose of measurement of expected credit losses (“ECL”) the Group uses supportable forward-looking information, including forecasts of macroeconomic variables. As with any economic forecast, however, the projections and likelihoods of their occurrence are subject to a high degree of inherent uncertainty and therefore the actual outcomes may be significantly different from those projected. Notes 4 and 41 provide more information of how the Group incorporated forward-looking information in the ECL models.

*[Note: This note serves as an illustrative example and should be adjusted for the facts and circumstances relevant to the Group.]*

# Basis of Preparation

These [consolidated] financial statements have been prepared in accordance with International Financial Reporting Standards as issued by the IASB (“IFRS Accounting Standards”).

These [consolidated] financial statements have been prepared under the historical cost convention, as modified by the initial recognition of financial instruments at fair value, and by the revaluation of [premises and equipment, investment properties,] 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 [consolidated] 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] financial statements are directed to primary users, being investors who lend or provide equity capital to the reporting entity. These [consolidated] financial statements assume that the primary users have a reasonable knowledge of business and economic activities and review and analyse the information diligently. At times, even well-informed and diligent users may need to seek the aid of an adviser to understand information about complex economic phenomena reported in these [consolidated] financial statements.

These [consolidated] financial statements aim disclosing only information that management considers is material for the primary users. Management seeks not to reduce the understandability of these [consolidated] financial statements by obscuring material information with immaterial information. Hence, only material accounting policy information is disclosed, where relevant, in the related disclosure notes.

3 Basis of Preparation (Continued)

***[Going concern.*** Management prepared these [consolidated] financial statements on a going concern basis. Refer to Note 4 for uncertainties relating to events and conditions that may cast a significant doubt upon the Group’s ability to continue as a going concern.]

***[Consolidated financial statements.*** These consolidated financial statements present financial information of the Bank and its subsidiaries. Acquisition method of accounting is used to account for the acquisition of subsidiaries [other than those acquired from parties under common control].

Purchases of subsidiaries from parties under common control were accounted for [in accordance with the acquisition method of accounting] [using the predecessor values method. Under this method, the [consolidated] financial statements of the combined entity are presented as if the businesses had been combined from the beginning of the earliest period presented or, if later, the date when the combining entities were first brought under common control. The assets and liabilities of the subsidiary transferred under common control are at the predecessor entity’s carrying amounts. The predecessor entity is considered to be the highest reporting entity in which the subsidiary’s IFRS financial information was consolidated. Related goodwill inherent in the predecessor entity’s original acquisitions is also recorded in these [consolidated] financial statements. Any difference between the carrying amount of net assets, including the predecessor entity's goodwill, and the consideration for the acquisition is accounted for in these [consolidated] financial statements as an adjustment to [other reserve / merger reserve] within equity].

***Presentation of statement of financial position in order of liquidity.*** The Group does not have a clearly identifiable operating cycle and therefore does not present current and non-current assets and liabilities separately in the statement of financial position. Instead, assets and liabilities are presented in order of their liquidity. Refer to Note 41 for analysis of financial instruments by their maturity. The following table provides information on amounts expected to be recovered or settled before and after twelve months after the reporting period for items that are not analysed in Note 41.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **31 December 2024** | | | **31 December 2023** | | |
|  | **Amounts expected to be recovered or settled** | | | **Amounts expected to be recovered or settled** | | |
| *In thousands of EUR* | **Within 12 months after the reporting period** | **After 12 months after the reporting period** | **Total** | **Within 12 months after the reporting period** | **After 12 months after the reporting period** | **Total** |
|  |  |  |  |  |  |  |
| ASSETS |  |  |  |  |  |  |
| Investment properties |  |  |  |  |  |  |
| Investment in associates |  |  |  |  |  |  |
| Current income tax prepayment |  |  |  |  |  |  |
| Deferred income tax asset |  |  |  |  |  |  |
| Goodwill |  |  |  |  |  |  |
| Intangible assets |  |  |  |  |  |  |
| Premises and equipment  Right of use assets |  |  |  |  |  |  |
| Other assets |  |  |  |  |  |  |
| Non-current assets held for sale (or disposal groups) |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| LIABILITIES |  |  |  |  |  |  |
| Current income tax liability |  |  |  |  |  |  |
| Deferred income tax liability |  |  |  |  |  |  |
| Provisions for liabilities and charges |  |  |  |  |  |  |
| Other liabilities |  |  |  |  |  |  |
| Liabilities directly associated with disposal groups held for sale |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

3 Basis of Preparation (Continued)

***Changes in presentation***. *[Tailor accordingly in order to disclose details of the changes in presentation as required by IAS 1.45-46 and IAS 8.]*

Where necessary, corresponding figures have been adjusted to conform to the presentation of the current year amounts. The effect of reclassifications for presentation purposes was as follows on amounts at 31 December 2023:

|  |  |  |  |
| --- | --- | --- | --- |
| *[In thousands of EUR]* | **[As originally presented]** | **[Reclassification]** | **[As reclassified at**  **31 December 2023]** |
|  |  |  |  |
| [Line item] |  |  |  |
| [Line item] |  |  |  |
| [Line item] |  |  |  |
| [Line item] |  |  |  |
| [Line item] |  |  |  |
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| [Line item] |  |  |  |
| [Line item] |  |  |  |
| [Line item] |  |  |  |
|  |  |  |  |

The effect of reclassifications for presentation purposes was as follows on amounts at 1 January 2023:

|  |  |  |  |
| --- | --- | --- | --- |
| *[In thousands of EUR]* | **[As originally presented]** | **[Reclassification]** | **[As reclassified at**  **1 January 2023]** |
|  |  |  |  |
| [Line item] |  |  |  |
| [Line item] |  |  |  |
| [Line item] |  |  |  |
| [Line item] |  |  |  |
| [Line item] |  |  |  |
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| [Line item] |  |  |  |
| [Line item] |  |  |  |
| [Line item] |  |  |  |
|  |  |  |  |

The third statement of financial position as of 1 January 2023 is presented in these [consolidated] financial statements as a result of the above described changes in presentation.

***Amendments of the [consolidated]*** ***financial statements after issue.*** The [Bank’s shareholder[s] and management have] the power to amend the [consolidated] financial statements after issue.

# Sources of Estimation Uncertainty and Judgements in Applying Accounting Policies

The Group makes estimates and assumptions that affect the amounts recognised in the [consolidated] 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 [consolidated] financial statements and estimates that can cause a significant adjustment to the carrying amount of assets and liabilities within the next financial year are explained below.

*[Refer to IAS 1.122 and 1.125 for disclosure requirements. The text below must be tailored and only* ***significant*** *estimates and judgements should be disclosed.*

***(a) Estimates with significant risk of a material adjustment within the next financial year***

***ECL measurement.*** 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 41. The following components have a major impact on credit loss allowance:

* segmentation of financial assets for the ECL assessment purposes;
* determination of a level of ECL assessment on an individual instrument basis or on a collective basis;
* definition of default applied by the Group;
* development and application of internal credit grading models, which assigns PDs to the individual credit risk grades;
* development and application of internal models used to estimate exposure at default (“EAD”) for financial instruments and credit related commitments;
* assessment of loss given default (“LGD”), including the judgments made in valuation of collaterals;
* criteria for assessing if there has been a significant increase in credit risk;
* selection of forward-looking macroeconomic scenarios and their probability weightings.

*[Please tailor the above list as appropriate for the Group]*

The Group regularly reviews and validates the models and inputs to the models to reduce any differences between expected credit loss estimates and actual credit loss experience.

[In 2024, due to significant and rapid changes in the economic environment, the Group decided to adjust the approach to measure ECL for the leveraged loans, primarily to commercial real estate and certain energy intensive sectors. The management performed a top-down portfolio analysis and had identified groups of borrowers, for which sufficient reasonable and supportable information for the ECL measurement is available only on sector basis, instead of individual basis. Overlays applied by the management resulted in the increase of ECL for corporate borrowers in the following industries:

* Commercial real estate – average ECL increase of \_\_% (2023: \_\_%);
* Steel production – average ECL increase of \_\_% (2023: \_\_%);
* Other energy intensive sectors – average ECL increase of \_\_% (2023: \_\_%);
* Traditional automotive sector – average ECL increase of \_\_% (2023: \_\_%).]

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies (Continued)

The Group used supportable forward-looking information for measurement of ECL, [primarily an outcome of its own macro-economic forecasting model]. The most significant forward-looking assumptions that correlate with ECL level and their assigned weights were as follows at 31 December 2024:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  |  | **Assi-gned weight** | **Assumption for:** | | | | |
| ***Variable*** | **Scenario** | **2024** |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **[Central bank base refinancing interest rate]** | [Base] | [60%] |  |  |  |  |  |
|  | [Upside] | [10%] |  |  |  |  |  |
|  | [Downside 1] | [20%] |  |  |  |  |  |
|  | [Downside 2] | [10%] |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **[Unemployment rate]** | [Base] | [60%] |  |  |  |  |  |
|  | [Upside] | [10%] |  |  |  |  |  |
|  | [Downside 1] | [20%] |  |  |  |  |  |
|  | [Downside 2] | [10%] |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **[GDP Growth rate]** | [Base] | [60%] |  |  |  |  |  |
|  | [Upside] | [10%] |  |  |  |  |  |
|  | [Downside 1] | [20%] |  |  |  |  |  |
|  | [Downside 2] | [10%] |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **[House price index]** | [Base] | [60%] |  |  |  |  |  |
|  | [Upside] | [10%] |  |  |  |  |  |
|  | [Downside 1] | [20%] |  |  |  |  |  |
|  | [Downside 2] | [10%] |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

The assumptions and assigned weights were as follows at 31 December 2023:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  |  | **Assi-gned weight** | **Assumption for:** | | | | |
| ***Variable*** | **Scenario** | **2024** | **2025** | **2026** | **2027** | **2028** |
|  |  |  |  |  |  |  |  |
| **[Central bank base refinancing interest rat]** | [Base] | [60%] |  |  |  |  |  |
|  | [Upside] | [20%] |  |  |  |  |  |
|  | [Downside 1] | [10%] |  |  |  |  |  |
|  | [Downside 2] | [10%] |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **[Unemployment rate]** | [Base] | [60%] |  |  |  |  |  |
|  | [Upside] | [20%] |  |  |  |  |  |
|  | [Downside 1] | [10%] |  |  |  |  |  |
|  | [Downside 2] | [10%] |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **[GDP Growth rate]** | [Base] | [60%] |  |  |  |  |  |
|  | [Upside] | [20%] |  |  |  |  |  |
|  | [Downside 1] | [10%] |  |  |  |  |  |
|  | [Downside 2] | [10%] |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **[House price index]** | [Base] | [60%] |  |  |  |  |  |
|  | [Upside] | [20%] |  |  |  |  |  |
|  | [Downside 1] | [10%] |  |  |  |  |  |
|  | [Downside 2] | [10%] |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

[The Group reduced the weights assigned to the upside scenario during 2023 primarily as a result of the far-reaching implications of the then current macroeconomic outlook. In 2024, the weights assigned to scenarios were adjusted / remained the same…*(provide details of the changes in 2024, as appropriate)*]

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies (Continued)

*[Describe the changes in the key assumptions and state reasons for the changes as required by IFRS 7 para 36G(c).]*

[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 EUR \_\_\_\_\_ thousand at 31 December 2024 (31 December 2023: by EUR \_\_\_\_\_\_ thousand). A corresponding change towards the upside assumptions would result in a decrease in ECL by EUR \_\_\_\_\_ thousand at 31 December 2024 (31 December 2023: by EUR \_\_\_\_\_\_ thousand).

A [10]% increase or decrease in PD estimates would result in an increase or decrease in total expected credit loss allowances of EUR \_\_\_\_ thousand at 31 December 2024 (31 December 2023: increase or decrease of EUR\_\_\_\_\_thousand). A [10]% increase or decrease in LGD estimates would result in an increase or decrease in total expected credit loss allowances of EUR \_\_\_\_ thousand at 31 December 2024 (31 December 2023: increase or decrease of EUR\_\_\_\_\_\_ thousand).]

*[Tailor the sensitivity disclosure to the Group’s circumstances;. The objective of this disclosure is to provide explanation of the changes between the two reporting dates.]*

[The Group offered payment holidays and temporary reduction in interest rates on certain consumer loans. The Group concluded that these measures result in contractual modification of the respective loans. Since there is no additional interest charged to borrowers during the payment holiday period, the Group recognised a modification loss in the amount of EUR\_\_\_thousand in the year ended 31 December 2024 (EUR\_\_\_\_thousand at 31 December 2023). Please specify where in the income statement this impact is presented.]

***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. In 2024 and 2023, application for payment holidays which were conditional on losing a job or a major source of income was considered as an indicator of SICR, as explained above. Refer to Note 41.

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies (Continued)

The following quantitative PD increase thresholds determine when the Group identifies SICR:

|  |  |  |
| --- | --- | --- |
|  | **2024** | **2023** |
|  |  |  |
| *Increase in original lifetime PD for remaining time to maturity by* |  |  |
| Corporate loans | 200% | 200% |
| Mortgage loans | 200% | 200% |
| Unsecured consumer loans | 200% | 200% |
| Credit cards | 200% | 200% |
| [etc] | 200% | 200% |
|  |  |  |

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 EUR \_\_\_\_ thousand as of 31 December 2024 (31 December 2023: higher by EUR \_\_\_\_ thousand).

***Environmental, Social and Governance (ESG) matters****. The note should be tailored to include ESG-related sources of key estimation uncertainty disclosures specific for the Group.*

***Fair value of derivatives and certain other instruments.*** Informationabout fairvalues of instruments that were valued using assumptions that are not based on observable market data is disclosed in Note 49.

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies (Continued)

***Deferred income tax asset recognition.*** The recognised deferred tax asset represents income taxes recoverable through future deductions from taxable profits, and is recorded in the statement of financial position. Deferred income tax assets are recorded to the extent that realisation of the related tax benefit is probable. The future taxable profits and the amount of tax benefits that are probable in the future are based on a medium term business plan prepared by management and extrapolated results thereafter. The business plan is based on management expectations that are believed to be reasonable under the circumstances. Key assumptions in the business plan are [list key assumptions used to prepare the budget].

***[Tax legislation.*** Tax, currency and customs legislation is subject to varying interpretations. Refer to Note 43.]

***Deferred income tax on post-acquisition retained earnings of subsidiaries.*** Deferred income tax is provided on post-acquisition retained earnings and other post acquisition movements in reserves of subsidiaries, except 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.

***Assumptions to determine amount of provisions.*** *[Tailor accordingly to state key sources of estimation uncertainty.]*

***Goodwill.*** The recoverable amount of goodwill was estimated based on a value in use calculation [fair value less costs to sell]. Refer to Note [17](#_heading=h.3as4poj).

***Valuation of investment properties using income capitalisation method.*** Investment property is stated at its fair value based on reports prepared by an international valuation company at the end of each reporting period. As a result of the current economic environment and market conditions as described in Note 2, the frequency of property transactions is low [in the Group’s principal markets]. Nevertheless, in management’s assessment there remains sufficient market activity to provide comparable prices for orderly transactions with similar properties when determining the fair value for the Group’s investment properties, except for certain of the Group’s [specify type] properties located in [location], with a carrying value of EUR \_\_\_ thousand (2023: EUR \_\_\_ thousand), because this information is not readily available there.

For these properties, the valuation was based principally on discounted cash flow projections based on reliable estimates of future cash flows, supported by the terms of any existing lease and other contracts and by external evidence such as current market rents for similar properties in the same location and condition, and using discount rates that reflect current market assessments of the uncertainty in the amount and timing of the cash flows.

In preparing the valuation reports on the Group’s investment property, [the external appraisers] excluded distressed sales when considering comparable sales prices. Management has reviewed the appraisers’ assumptions underlying discounted cash flow models used in the valuation and confirmed that factors such as the discount rate applied have been appropriately determined considering the market conditions at the end of the reporting period. Notwithstanding the above, management considers that the valuation of its investment properties is currently subject to an increased degree of judgement and an increased likelihood that actual proceeds on a sale may differ from the carrying value.

The principal assumptions underlying the estimation of the fair value are those relating to: the receipt of contractual rentals; expected future market rentals; void periods; maintenance requirements; and appropriate discount rates. These valuations are regularly compared to actual market yield data and actual transactions by the Group, and those reported by the market.

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies (Continued)

The principal assumptions made and the impact on the aggregate valuations of reasonably possible changes in these assumptions, with all other variables held constant, are as follows:

* The future rental rates were estimated depending on the actual location of the properties: for *[specify region and rates]* per square meter per annum for [retail and office space] respectively, and for *[specify region and rates]* per square meter per annum for [retail and office space] respectively. Had these rental rates been increased or decreased by 10 percent, the total carrying value of investment properties would be EUR \_\_\_\_ thousand higher or EUR \_\_\_\_ thousand lower, respectively.
* Vacancy loss rate was assumed to be in the range of \_\_\_% ‒ \_\_\_% (2023: \_\_\_% ‒ \_\_\_%) in different years of operation. Should the vacancy loss rate increase / decrease by 1 percentage point (2023: 1 percentage point), the carrying value of the investment properties would be EUR \_\_\_\_ thousand lower / EUR \_\_\_\_ thousand higher (2023: EUR \_\_\_\_ thousand lower / EUR \_\_\_\_ thousand higher).
* Bad debt losses are assumed to be [nil] in all years of operations (2023: [nil] in all years of operations). Should the bad debt losses increase to \_\_\_% (2023: \_\_\_%) of effective gross income each year, the carrying value of the investment properties would be EUR \_\_\_\_ thousand lower (2023: EUR \_\_\_\_ thousand lower).
* Property management fees are assumed to be \_\_\_% (2023: \_\_\_%) of effective gross income. Should the fees increase / decrease by 1 percentage point (2023: 1 percentage point), the carrying value of the investment properties would be EUR \_\_\_\_ thousand lower / higher (2023: EUR \_\_\_\_ thousand lower / higher).
* Repair expenses are assumed to be \_\_\_% (2023: \_\_\_%) of effective gross income. Should these expenses increase / decrease by \_\_\_ percentage point (2023: \_\_\_ percentage point), the carrying value of the investment property would be EUR \_\_\_\_ thousand lower / higher (2023: EUR \_\_\_\_ thousand lower / higher).
* The discount rate was assumed to be \_\_\_% ‒ \_\_\_% (2023: \_\_\_% ‒ \_\_\_%) for different properties. Should this discount rate increase / decrease by 1 percentage point (2023: 1 percentage point), the carrying value of the investment property would be EUR \_\_\_\_ thousand lower / EUR \_\_\_\_ thousand higher (2023: EUR \_\_\_\_ thousand lower / higher).
* [The capitalisation rate was assumed to be \_\_\_% ‒ \_\_\_% (2023: \_\_\_% ‒ \_\_\_%). Should this capitalisation rate increase / decrease by 1 percentage point (2023: 1 percentage point), the carrying value of the investment property would be EUR \_\_\_\_ thousand lower / EUR \_\_\_\_ thousand higher (2023: EUR \_\_\_\_ thousand lower / EUR \_\_\_\_ thousand higher).]

***Valuation of own use premises.*** Premises of the Group are stated at fair value based on reports prepared by an international valuation company. Due to the nature of the premises and lack of comparable market data, the fair value of the premises is estimated based on the income capitalisation method, where the value is estimated from the expected market rental income streams from similar properties and capitalisation yields. The method considers net income generated by comparable property, capitalised to determine the value for property which is subject to the valuation.

The principal assumptions underlying the estimation of the fair value are those relating to: the possible market rentals and appropriate discount rates. These valuations are regularly compared to actual market yield data and actual transactions by the Group and those reported by the market.

The impact on the aggregate valuations of reasonably possible changes in these assumptions, with all other variables held constant, are as follows:

* The capitalisation rate was assumed to be \_\_\_% ‒ \_\_\_% (2023: \_\_\_% ‒ \_\_\_%). Should this capitalisation rate increase / decrease by 1 percentage point (2023: 1 percentage point), the carrying value of the premises would be EUR \_\_\_\_ thousand lower / EUR \_\_\_\_ thousand higher (2023: EUR \_\_\_\_ thousand lower / EUR \_\_\_\_ thousand higher).
* Possible property rental income was assumed to be EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) per annum. Should this rental income increase / decrease by 10 percent (2023: 10 percent), the carrying value of the premises would be EUR \_\_\_\_ thousand higher / EUR \_\_\_\_ thousand lower (2023: EUR \_\_\_\_ thousand higher / EUR \_\_\_\_ thousand lower).

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies (Continued)

***Determining lease term.*** The Group leases office buildings from third parties under contracts which do not have contractual maturity dates and are automatically renewed unless either party submits a termination notice of [12 months]. The Group determines non-cancellable lease period for such leases, taking into consideration penalties that would be incurred upon termination, including economic disincentives such as leasehold improvements, cost of relocating or the importance of the premises to the Group’s operations. As a result, the lease term for most significant office buildings has been determined as a period of [3-5 years].

***Functional currencies of different entities of the Group.*** Different entities within the Group have different functional currencies, based on the underlying economic conditions of their operations. This determination, of what the specific underlying economic conditions are, requires judgement. In making this judgement, the Group evaluates among other factors, the location of activities, the sources of revenue, risks associated with activities and denomination of currencies of operations of different entities. Specifically, in determination of the functional currencies of [entity names], the Group based its judgement on the fact that the companies operate internationally on markets mainly influenced by the [US Dollar (not Euro)] and their major activities include provision of services to foreign investors. Moreover, the majority of their operations are denominated in [US Dollars] and also, the [US Dollar] is the currency in which their business risks and exposures are managed, and the performance of their business is measured.

***Customer loyalty program.*** The credit card award points provide a material right to customers that they would not otherwise receive. Therefore, the loyalty points represent a separate performance obligation. The transaction price is allocated to the main product and the points on a relative stand-alone selling price basis. Management estimates the stand-alone selling price per point on the basis of the discount granted when the points are redeemed and on the basis of the likelihood of redemption, based on past experience.

The stand-alone selling price of the product sold is estimated on the basis of the retail price. Discounts are not considered as they are only given in rare circumstances. If the likelihood of redemption would be [5] per cent higher/lower, the amount of the liability under the program would be EUR\_\_\_\_ higher/lower.

***Changes in accounting estimates.*** *Tailor accordingly to disclose the nature and amount of a change in an accounting estimate that has an effect in the current period or that is expected to have an effect in future periods. If it is impracticable to estimate the amount, disclose this fact. Refer to IAS 8 paragraphs 39 and 40.] [Describe also other key assumptions or key sources of estimation uncertainty that have a significant risk of causing a material adjustment to the assets and liabilities within the next year. Refer to IAS 1.125.]*

***(b) Judgements in applying accounting policies with the most significant effect on the recognised amounts.***

***Going concern.***Management prepared these [consolidated] financial statements on a going concern basis. In making this judgement management considered the Group’s financial position, current intentions, profitability of operations and access to financial resources, and analysed the impact of recent macro-economic developments on future operations of the Group. *Expand the text to describe material uncertainties relating to events or conditions that may cast significant doubt on the Group’s ability to continue as a going concern – IAS 1.25.]*

***Performance guarantees treated as loan commitments.*** The Group analysed the issued performance guarantee contracts to assess whether they would meet the definition of insurance contracts in the scope of IFRS 17. The Group has concluded that certain of its performance guarantee contracts expose the Group solely to credit risk of the applicant because (i) all the contracts require the customers who apply for a guarantee to fully collateralise their obligations to indemnify the Group as the issuer and (ii) there are no scenarios with commercial substance where the Group would have to pay significant additional amounts to the holders of such guarantees. Accordingly, the Group accounts for these contracts as loan commitments in accordance with IFRS 9. The gross amount of the performance guarantees issued and accounted for as loan commitments is \_\_\_ (31 December 2023: \_\_\_\_\_) (refer to Note 26) and the carrying value of the related liability recognised in the statement of financial position is \_\_\_ at 31 December 2024 (31 December 2023: \_\_\_\_). The fee income recognised for these performance guarantees was \_\_\_ for the year ended 31 December 2024 (2023: \_\_\_\_\_).

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies (Continued)

***Credit exposure on revolving credit facilities (e.g. credit cards, overdrafts).*** For certain loan facilities, the Group's exposure to credit losses may extend beyond the maximum contractual period of the facility. This exception applies to certain revolving credit facilities, which include both a loan and an undrawn commitment component and where the Group's contractual ability to demand repayment and cancel the undrawn component in practice does not limit its exposure to credit losses.

For such facilities, the Group measures ECLs over the period that the Group is exposed to credit risk and ECLs are not mitigated by credit risk management actions. Application of this exception requires judgement. Management applied its judgement in identifying the facilities, both retail and commercial, to which this exception applies. The Group applied this exception to facilities with the following characteristics: (a) there is no fixed term or repayment structure, (b) the contractual ability to cancel the contract is not in practice enforced as a result of day-to-day management of the credit exposure and the contract may only be cancelled when the Group becomes aware of an increase in credit risk at the level of an individual facility, and (c) the exposures are managed on a collective basis. Further, the Group applied judgement in determining a period for measuring the ECL, including the starting point and the expected end point of the exposures.

The Group considered historical information and experience about: (a) the period over which the Group is exposed to credit risk on similar facilities, including when the last significant modification of the facility occurred and that therefore determines the starting point for assessing SICR, (b) the length of time for related defaults to occur on similar financial instruments following a SICR and (c) the credit risk management actions (eg the reduction or removal of undrawn limits), prepayment rates and other factors that drive expected maturity. In applying these factors, the Group segments the portfolios of revolving facilities into sub-groups and applies the factors that are most relevant based on historical data and experience as well as forward-looking information.

***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.

The Group identified approximately \_\_\_% of debt securities as a liquidity portfolio and classified as held to collect and sell, while the rest of the debt securities is classified as held to collect based on the assumption that these securities would only be sold in a stress case scenario.

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies (Continued)

[The Group assessed that its residential mortgage loan portfolio meets the criteria for held to collect business model and determined that the past securitisation transactions were infrequent and therefore are not inconsistent with the held to collect 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. In making this judgement, the Group considers:

* Contingent events that would change the amount and timing of cash flows,
* Leverage features;
* Prepayment and extension terms;
* Terms that limit the Group’s claim to the cash flows from specified assets (e.g. non-recurse financing);
* Features that modify consideration of the time value of money element (e.g. periodical reset of interest rates);

*[Please adjust the above list for specific considerations.]*

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 [5%] 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, ie 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 considered examples in the standard and concluded that features that arise solely from legislation and that are not part of the contract, that is, if legislation changed, the features would no longer apply (such as bail in legislation in certain countries), are not relevant for assessing whether cash flows are SPPI.

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies (Continued)

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 Group’s loans, primarily to real estate developers, have cash flows that highly depend on performance of the underlying assets. The loans are carried at FVTPL where management determined that such loans are in substance non-recourse.

The instruments that failed the SPPI test are measured at FVTPL.

***Modification of financial assets.*** 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.

***Write-off policy.*** 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. Determining the cash flows for which there is no reasonable expectation of recovery requires judgement. Management considered the following indicators that there is no reasonable expectation of recovery: [loans being past due over \_\_\_ days, liquidation or bankruptcy proceedings, fair value of collateral is less than the costs to repossess it or enforcement activities were completed]. Management also considers, based on past practices, that contractual default interest is not collectible for loans overdue over \_\_\_ days. Therefore, the default interest was written-off from the gross carrying amounts of the respective loans

4 Critical Accounting Estimates, and Judgements in Applying Accounting Policies (Continued)

***Finance leases and derecognition of financial assets.*** In assessing transfers of financial assets and classification of leases of non-financial assets to third parties, management applies judgement to determine if substantially all the significant risks and rewards of ownership of financial assets and leased assets are transferred to counterparties, in particular which risks and rewards are the most significant and what constitutes substantially all risks and rewards. *[Tailor to disclose specific judgements made.]*

***Acquisition of a business vs assets.*** The acquisition method of accounting is used to account for the acquisition of subsidiaries [other than those acquired from parties under common control]. 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 acquisition method of accounting is applied if the acquired entity represents a business: it has inputs and a substantive process that together significantly contribute to the ability to create outputs. This definition is also applied to early stage companies that have not yet generated outputs. When assessing whether the acquired entity is a business, the Group may apply a ‘concentration test’ whereby the acquired assets are not considered a business if substantially all of the fair value of gross assets is concentrated in a single asset or a group of similar assets.

***Structured entities.*** Structuredentities are designed so that voting or similar rights are not the dominant factor in deciding who controls the entity. Judgement is also required to determine whether the substance of the relationship between the Group and a structured entity indicates that the structured entity is controlled by the Group.

The Group does not consolidate structured entities that it does not control. As it can sometimes be difficult to determine whether the Group does control a structured entity, management makes judgements about its exposure to the risks and rewards, as well as about its ability to make operational decisions for the structured entity in question. In many instances, elements are present that, considered in isolation, indicate control or lack of control over a structured entity, but when considered together make it difficult to reach a clear conclusion. In cases where more arguments are in place towards existence of control, the structured entity is consolidated. *[Tailor to disclose specific judgements made.]*

Were the Group not to consolidate the assets, liabilities and the results of these consolidated structured entities, the net effect on the statement of financial position would be a [decrease] in net assets of EUR \_\_\_\_ thousand (31 December 2023: decrease in net assets of EUR \_\_\_\_ thousand) and [increase] in profit by EUR \_\_\_\_ thousand (2023: [increase] of EUR \_\_\_\_ thousand). Refer to Note 46 for further information about the Group’s exposure to structured entities.

***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 51.

***Identification of leases embedded in complex contracts.*** *Tailor to disclose specific judgements made.*

# Adoption of New or Revised Standards and Interpretations

The following amendments became effective from 1 January 2024:

***Amendments to IFRS 16 Leases: Lease Liability in a Sale and Leaseback (issued on 22 September 2022 and effective for annual periods beginning on or after 1 January 2024).*** The amendments relate to the sale and leaseback transactions that satisfy the requirements in IFRS 15 to be accounted for as a sale. The amendments require the seller-lessee to subsequently measure liabilities arising from the transaction and in a way that it does not recognise any gain or loss related to the right of use that it retained. This means deferral of such a gain even if the obligation is to make variable payments that do not depend on an index or a rate.

***Classification of liabilities as current or non-current – Amendments to IAS 1 (originally issued on 23 January 2020 and subsequently amended on 15 July 2020 and 31 October 2022, ultimately effective for annual periods beginning on or after 1 January 2024).*** These amendments clarify when liabilities are classified as either current or non-current. As most financial institutions, the Group presents its statement of financial position ordered by liquidity rather than classifying its assets and liabilities as current or non-current. Therefore, this amendment had no impact on these consolidated financial statements.

***Amendments to IAS 7 Statement of Cash Flows and IFRS 7 Financial Instruments: Disclosures: Supplier Finance Arrangements (Issued on 25 May 2023).*** In response to concerns of the users of financial statements about inadequate or misleading disclosure of financing arrangements, in May 2023, the IASB issued amendments to IAS 7 and IFRS 7 to require disclosure about entity’s supplier finance arrangements (SFAs). These amendments require the disclosures of the entity’s supplier finance arrangements that enable the users of financial statements to assess the effects of those arrangements on the entity’s liabilities and cash flows and on the entity’s exposure to liquidity risk. The purpose of the additional disclosure requirements is to enhance the transparency of the supplier finance arrangements. The amendments do not affect recognition or measurement principles but only disclosure requirements.

The application of the above amendments had no significant impact on the Group’s [consolidated] financial statements.

# New Accounting Pronouncements

Certain new standards and interpretations have been issued that are mandatory for the annual periods beginning on or after 1 January 2025 or later, and which the Group has not early adopted.

***Amendments to IAS 21 Lack of Exchangeability (Issued on 15 August 2023 and effective for annual periods beginning on or after 1 January 2025).*** In August 2023, the IASB issued amendments to IAS 21 to help entities assess exchangeability between two currencies and determine the spot exchange rate, when exchangeability is lacking. An entity is impacted by the amendments when it has a transaction or an operation in a foreign currency that is not exchangeable into another currency at a measurement date for a specified purpose. The amendments to IAS 21 do not provide detailed requirements on how to estimate the spot exchange rate. Instead, they set out a framework under which an entity can determine the spot exchange rate at the measurement date. When applying the new requirements, it is not permitted to restate comparative information. It is required to translate the affected amounts at estimated spot exchange rates at the date of initial application, with an adjustment to retained earnings or to the reserve for cumulative translation differences. [The Group is currently assessing the impact of the amendments on its financial statements.]

6 New Accounting Pronouncements (Continued)

***Amendments to the Classification and Measurement of Financial Instruments - Amendments to IFRS 9 and IFRS 7 (issued on 30 May 2024 and effective for annual periods beginning on or after 1 January 2026).*** On 30 May 2024, the IASB issued amendments to IFRS 9 and IFRS 7 to:

(a) clarify the date of recognition and derecognition of some financial assets and liabilities, with a new exception for some financial liabilities settled through an electronic cash transfer system;

(b) clarify and add further guidance for assessing whether a financial asset meets the solely payments of principal and interest (SPPI) criterion;

(c) add new disclosures for certain instruments with contractual terms that can change cash flows (such as some instruments with features linked to the achievement of environment, social and governance (ESG) targets); and

(d) update the disclosures for equity instruments designated at fair value through other comprehensive income (FVOCI).

[The Group is currently assessing the impact of the amendments on its financial statements.]

***IFRS 18 Presentation and Disclosure in Financial Statements (Issued on 9 April 2024 and effective for annual periods beginning on or after 1 January 2027).*** In April 2024, the IASB has issued IFRS 18, the new standard on presentation and disclosure in financial statements, with a focus on updates to the statement of profit or loss. The key new concepts introduced in IFRS 18 relate to:

- the structure of the statement of profit or loss;

- required disclosures in the financial statements for certain profit or loss performance measures that are reported outside an entity’s financial statements (that is, management-defined performance measures); and

- enhanced principles on aggregation and disaggregation which apply to the primary financial statements and notes in general.

IFRS 18 will replace IAS 1; many of the other existing principles in IAS 1 are retained, with limited changes. IFRS 18 will not impact the recognition or measurement of items in the financial statements, but it might change what an entity reports as its ‘operating profit or loss’. IFRS 18 will apply for reporting periods beginning on or after 1 January 2027 and also applies to comparative information. [The Group is currently assessing the impact of the amendments on its financial statements.]

***IFRS 19 Subsidiaries without Public Accountability: Disclosures (Issued on 9 May 2024 and effective for annual periods beginning on or after 1 January 2027).*** IFRS 19 permits eligible subsidiaries to use IFRS Accounting Standards with reduced disclosures. The Group is not eligible to apply the reduced disclosure requirements introduced by this standard.

***IFRS 14, Regulatory Deferral Accounts (issued on 30 January 2014).*** IFRS 14 permits first-time adopters to continue to recognise amounts related to rate regulation in accordance with their previous GAAP requirements when they adopt IFRS. However, to enhance comparability with entities that already apply IFRS and do not recognise such amounts, the standard requires that the effect of rate regulation must be presented separately from other items. An entity that already presents IFRS financial statements is not eligible to apply the standard. This standard will be effective from a date that is yet to be determined by the IASB.

***Sale or Contribution of Assets between an Investor and its Associate or Joint Venture – Amendments to IFRS 10 and IAS 28 (issued on 11 September 2014 and effective for annual periods beginning on or after a date to be determined by the IASB).*** These amendments address an inconsistency between the requirements in IFRS 10 and those in IAS 28 in dealing with the sale or contribution of assets between an investor and its associate or joint venture. The main consequence of the amendments is that a full gain or loss is recognised when a transaction involves a business. A partial gain or loss is recognised when a transaction involves assets that do not constitute a business, even if these assets are held by a subsidiary. In 2015, the IASB decided to postpone the effective date of these amendments indefinitely.

6 New Accounting Pronouncements (Continued)

***Annual Improvements to IFRS Accounting Standards (Issued in July 2024 and effective from 1 January 2026).*** IFRS 1 was clarified that a hedge should be discontinued upon transition to IFRS Accounting Standards if it does not meet the ‘qualifying criteria’, rather than ‘conditions’ for hedge accounting, in order to resolve a potential confusion arising from an inconsistency between the wording in IFRS 1 and the requirements for hedge accounting in IFRS 9. IFRS 7 requires disclosures about a gain or loss on derecognition relating to financial assets in which the entity has a continuing involvement, including whether fair value measurements included ‘significant unobservable inputs’. This new phrase replaced reference to ‘significant inputs that were not based on observable market data’. The amendment makes the wording consistent with IFRS 13. In addition, certain IFRS 7 implementation guidance examples were clarified and text added that the examples do not necessarily illustrate all the requirements in the referenced paragraphs of IFRS 7. IFRS 16 was amended to clarify that when a lessee has determined that a lease liability has been extinguished in accordance with IFRS 9, the lessee is required to apply IFRS 9 guidance to recognise any resulting gain or loss in profit or loss. This clarification applies to lease liabilities that are extinguished on or after the beginning of the annual reporting period in which the entity first applies that amendment. In order to resolve an inconsistency between IFRS 9 and IFRS 15, trade receivables are now required to be initially recognised at ‘the amount determined by applying IFRS 15’ instead of at ‘their transaction price (as defined in IFRS 15)’. IFRS 10 was amended to use less conclusive language when an entity is a ‘de-facto agent’ and to clarify that the relationship described in paragraph B74 of IFRS 10 is just one example of a circumstance in which judgement is required to determine whether a party is acting as a de-facto agent. IAS 7 was corrected to delete references to ‘cost method’ that was removed from IFRS Accounting Standards in May 2008 when the IASB issued amendment ‘Cost of an Investment in a Subsidiary, Jointly Controlled Entity or Associate’.

Unless otherwise described above, the new standards and interpretations are not expected to affect significantly the Group’s [consolidated] financial statements.

# Cash and Cash Equivalents

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Cash on hand |  |  |
| Cash balances with the NBC (other than mandatory reserve deposits) |  |  |
| Mandatory cash balances with NBC |  |  |
| Correspondent accounts and overnight placements with other banks |  |  |
| Placements with other banks with original maturities of less than three months |  |  |
| Reverse sale and repurchase agreements with other banks with original maturities of less than three months |  |  |
|  |  |  |
|  |  |  |
| **Total cash and cash equivalents** |  |  |
|  |  |  |

7 Cash and Cash Equivalents (Continued)

***[***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 [mandatory reserve deposits with the NBC and] 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. [Features mandated solely by legislation, such as the bail-in legislation in certain countries, do not have an impact on the SPPI test, unless they are included in contractual terms such that the feature would apply even if the legislation is subsequently changed.]

[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 NBC 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.]

The table below discloses the credit quality of cash and cash equivalents balances based on credit risk grades at 31 December 2024. Refer to Note 41 for the description of the Group’s credit risk grading system.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Cash balances with the NBC, including mandatory reserves** | **Correspon-dent accounts and overnight placements** | **Placements with other banks** | **Reverse sale and repurchase agreements with other banks** | **Total** |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total cash and cash equivalents, excluding cash on hand** |  |  |  |  |  |
|  |  |  |  |  |  |

7 Cash and Cash Equivalents (Continued)

The credit quality of cash and cash equivalents balances based on credit risk grades at 31 December 2023 is as follows.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Cash balances with the NBC, including mandatory reserves** | **Correspon-dent accounts and overnight placements** | **Placements with other banks** | **Reverse sale and repurchase agreements with other banks** | **Total** |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total cash and cash equivalents, excluding cash on hand** |  |  |  |  |  |
|  |  |  |  |  |  |

For the purpose of ECL measurement cash and cash equivalents balances are included in Stage 1. The ECL for these balances represents an insignificant amount, therefore the Group did not recognise any credit loss allowance for cash and cash equivalents. Refer to Note 41 for the ECL measurement approach.

Except for reverse sale and repurchase agreements, amounts of cash and cash equivalents are not collateralised. The Group has a right to sell or repledge securities with a fair value of EUR \_\_\_ thousand (2023: EUR \_\_\_ thousand) received under reverse sale and repurchase agreements. *[Tailor to disclose any material terms and conditions associated with the use of the collateral.]*

Investing transactions that did not require the use of cash and cash equivalents, and were excluded from the statement of cash flows are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| **Non-cash investing activities** |  |  |
| Acquisition of debt securities at FVOCI in exchange for \_\_\_\_\_\_ [*e.g. assumed liability]* |  |  |
| Proceeds from disposal [and redemption] of debt securities at FVOCI in the form of \_\_\_\_\_ *[e.g. investment property]* |  |  |
| Acquisition of equity securities at FVOCI in exchange for \_\_\_\_\_\_ |  |  |
| Proceeds from disposal of equity securities at FVOCI in the form of \_\_\_\_\_ |  |  |
| Acquisition of premises and equipment in exchange for \_\_\_\_\_ |  |  |
| Proceeds from disposal of premises and equipment in the form of \_\_\_\_\_ |  |  |
| Acquisition of associates in exchange for \_\_\_\_\_ |  |  |
| Proceeds from disposal of associates in the form of \_\_\_\_\_ |  |  |
| Acquisition of investment properties in exchange for \_\_\_\_\_ |  |  |
| Proceeds from disposal of investment properties in the form of \_\_\_\_\_ |  |  |
| Acquisition of intangible assets in exchange for \_\_\_\_\_ |  |  |
| Proceeds from disposal of intangible assets in the form of \_\_\_\_\_ |  |  |
| Non-cash dividends received |  |  |
| Recognition of right of use assets against lease liabilities |  |  |
|  |  |  |
|  |  |  |
| **Non-cash investing activities** |  |  |
|  |  |  |

7 Cash and Cash Equivalents (Continued)

Financing transactions that did not require the use of cash and cash equivalents, and were excluded from the statement of cash flows are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| **Non-cash financing activities** |  |  |
| Proceeds from other borrowed funds in the form of \_\_\_\_\_ |  |  |
| Repayment of other borrowed funds in \_\_\_\_\_ *[e.g. gold]* |  |  |
| Issue of ordinary shares in exchange for \_\_\_\_\_ |  |  |
| Issue of preference shares in exchange for \_\_\_\_\_ |  |  |
| Capital contributions from shareholders other than share issues in the form of \_\_\_\_\_ |  |  |
| Acquisition of treasury shares in exchange for \_\_\_\_\_ |  |  |
| Disposal of treasury shares for \_\_\_\_\_ |  |  |
| Transfer of \_\_\_\_\_ as a capital distribution to the shareholders other than a dividend |  |  |
| Initial recognition of lease liabilities |  |  |
|  |  |  |
|  |  |  |
| **Non-cash financing activities** |  |  |
|  |  |  |

[Further non-cash transactions are presented in Note 52 which includes details of assets acquired and liabilities assumed in business combinations, and in Note 20 which includes details of assets and liabilities of disposed subsidiaries.]

At 31 December 2024 the Group had \_\_\_\_\_ counterparty banks (2023: \_\_\_\_\_ banks) with aggregated cash and cash equivalent balances above EUR \_\_\_\_\_\_ thousand. The total aggregate amount of these balances was EUR \_\_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_\_ thousand) or \_\_\_\_\_% of the cash and cash equivalents (2023: \_\_\_\_\_%).

Interest rate analysis of cash and cash equivalents is disclosed in Note 41. Information on related party balances is disclosed in Note 51.

# Due from Other Banks

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Placements with other banks with original maturities of more than three months |  |  |
| Reverse sale and repurchase agreements with other banks with original maturities of more than three months |  |  |
|  |  |  |
|  |  |  |
| Less credit loss allowance |  |  |
|  |  |  |
|  |  |  |
| **Total 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.]

[Certain bank deposits held by the Group are subject to the “bail-in” legislation that permits or requires a national resolving authority to impose losses on holders in particular circumstances. Where the bail-in clauses are included in the contractual terms of the instrument and would apply even if legislation subsequently changes, the SPPI test is not met and such instruments are mandatorily measured at FVTPL.]

8 Due from Other Banks (Continued)

[The Group did not identify such balances due from other banks.] Where such clauses in the contract merely acknowledge the existence of the legislation and do not create any additional rights or obligation for the Group, the SPPI criterion is met and the respective instruments are carried at AC.]

The following table contains an analysis of due from other banks balances by credit quality at 31 December 2024 based on credit risk grades and discloses due from other banks balances by three stages for the purpose of ECL measurement. Refer to Note 41 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 due from other banks balances. The carrying amount of due from other banks balances at 31 December 2024 below also represents the Group's maximum exposure to credit risk on these assets:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit impaired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Placements with other banks*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Reverse sale and repurchase agreements*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total due from other banks (gross carrying amount)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Credit loss allowance** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total due from other banks (carrying amount)** |  |  |  |  |  |
|  |  |  |  |  |  |

8 Due from Other Banks (Continued)

The following table contains an analysis of due from other banks balances by credit quality at 31 December 2023 based on credit risk grades and discloses due from other banks balances by three stages for the purpose of ECL measurement.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit impaired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Placements with other banks*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Reverse sale and repurchase agreements*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total due from other banks (gross carrying amount)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Credit loss allowance** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total due from other banks (carrying amount)** |  |  |  |  |  |
|  |  |  |  |  |  |

The total amount of undiscounted ECLs at initial recognition for POCI financial assets recognised during the period was EUR \_\_\_\_\_\_\_ thousand (2023: EUR \_\_\_ thousand).

During 2024, a gain [loss] on initial recognition of due from other banks at rates above [below] market in the amount of EUR \_\_\_ thousand (2023: EUR \_\_\_ thousand) has been recorded [in profit or loss for the year].

8 Due from Other Banks (Continued)

At 31 December 2024 and 31 December 2023 except for reverse sale and repurchase agreements, due from other banks balances are not collateralised.

The Group has a right to sell or repledge securities with a fair value of EUR \_\_\_ thousand (2023: EUR \_\_\_ thousand) received under reverse sale and repurchase agreements. *[Tailor to disclose any material terms and conditions associated with the use of the collateral.]*

The extent to which collateral mitigates credit risk 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”).

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Over-collateralised**  **Assets** | | **Under-collateralised**  **Assets** | |
| *In thousands of EUR* | **Carrying value of the assets** | **Fair value of collateral** | **Carrying value of the assets** | **Fair value of collateral** |
|  |  |  |  |  |
| **31 December 2024** |  |  |  |  |
| Reverse sale and repurchase agreements with other banks with original maturities of less than three months |  |  |  |  |
|  |  |  |  |  |
| **31 December 2023** |  |  |  |  |
| Reverse sale and repurchase agreements with other banks with original maturities of less than three months |  |  |  |  |
|  |  |  |  |  |

The Group did not recognise ECL for short-term over-collateralised reverse sale and repurchase agreements. The collateral represents marketable [government bonds]. *[Tailor to disclose nature and quality of collateral, changes in quality of collateral.]*

The credit loss allowance for due from other banks recognised in 2024 year is impacted by a variety of factors, as described below:

* Transfers between Stage 1 and Stages 2 or 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 de-recognised in the period;
* Impact on the measurement of ECL due to changes in PDs, EADs and LGDs in the period, arising from regular update of inputs to ECL models;
* Impacts on the measurement of ECL due to changes made to models and assumptions;
* Unwinding of discount due to the passage of time because ECL is measured on a present value basis;
* Foreign exchange translations of assets denominated in foreign currencies and other movements; and
* Financial assets derecognised during the period and write-offs of allowances related to assets that were written off during the period.

8 Due from Other Banks (Continued)

The following tables explain the changes in the credit loss allowance and gross carrying amount due from other banks between the beginning and the end of the annual period due to these factors.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***Placements with other banks*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discounting |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| Foreign exchange translation and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discounting for Stage 3 assets |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2024** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

8 Due from Other Banks (Continued)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***Reverse repurchase agreements*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discounting |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| FX and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discounting (for Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2024** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

8 Due from Other Banks (Continued)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***Placements with other banks*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 1 January 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discounting |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| Foreign exchange translation and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discounting for Stage 3 assets |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

8 Due from Other Banks (Continued)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***Reverse repurchase agreements*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 1 January 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discounting |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| FX and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discounting (for Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

*[If the Group has POCI financial instruments, the Group should disclose the changes in the credit loss allowance between the beginning and the end of the reporting period for such instruments and explain the changes in the gross carrying amount that contributed to the change in credit loss allowance. For example, it can be achieved by adding column “POCI” in the table above.]*

8 Due from Other Banks (Continued)

[The change in expected credit loss allowance for the year differs from the credit loss amount presented in profit or loss for the year due to EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand), recovery of amounts previously written off as uncollectible. The amount of the recovery was credited directly to the expected credit loss allowance line in profit or loss for the year*.]*

At 31 December 2024 the Group had balances with \_\_\_\_\_ counterparty banks (2023: \_\_\_\_\_ banks) with aggregated amounts above EUR \_\_\_\_\_\_ thousand. The total aggregate amount of these deposits was EUR \_\_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_\_ thousand) or \_\_\_\_\_% of the total amount due from other banks (2023: \_\_\_\_\_%).

[As an active participant in the banking markets, the Group has a significant concentration of credit risk with other financial institutions. In total, credit risk exposure to financial institutions is estimated to have amounted to EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) comprising cash and cash equivalents, deposits and other amounts due from banks, repurchase receivables and financial derivatives.]

Refer to Note 49 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 41. Information on related party balances is disclosed in Note 51.

# Investments in Debt Securities

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Debt securities mandatorily measured at FVTPL |  |  |
| Debt securities designated as at FVTPL at initial recognition |  |  |
| Debt securities at FVOCI |  |  |
| Debt securities at AC |  |  |
|  |  |  |
|  |  |  |
| **Total investments in debt securities** |  |  |
|  |  |  |

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.

[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.]

9 Investments in Debt Securities (Continued)

The table below discloses investments in debt securities at 31 December 2024 by measurement categories and classes:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Debt securities mandatorily measured at FVTPL** | **Debt securities designated as at FVTPL at initial recognition** | **Debt securities at FVOCI** | **Debt securities at AC** | **Total** |
|  |  |  |  |  |  |
| [Country] government bonds |  |  |  |  |  |
| Municipal bonds |  |  |  |  |  |
| Corporate bonds |  |  |  |  |  |
| Investments in mutual funds |  |  |  |  |  |
| Promissory notes |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total investments in debt securities  at 31 December 2024 (fair value or gross carrying value) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance | - | - | - |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities  at 31 December 2024 (carrying value)** |  |  |  |  |  |
|  |  |  |  |  |  |

The table below discloses investments in debt securities at 31 December 2023 by measurement categories and classes:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Debt securities mandatorily measured at FVTPL** | **Debt securities designated as at FVTPL at initial recognition** | **Debt securities at FVOCI** | **Debt securities at AC** | **Total** |
|  |  |  |  |  |  |
| [Country] government bonds |  |  |  |  |  |
| Municipal bonds |  |  |  |  |  |
| Corporate bonds |  |  |  |  |  |
| Investments in mutual funds |  |  |  |  |  |
| Promissory notes |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total investments in debt securities  at 31 December 2023 (fair value or gross carrying value) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance | - | - | - |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities  at 31 December 2023 (carrying value)** |  |  |  |  |  |
|  |  |  |  |  |  |

9 Investments in Debt Securities (Continued)

Debt securities mandatorily measured at FVTPL include investments in mutual funds. These investments failed to meet the “solely payment of principle and interest” (SPPI) requirement as mutual funds pay dividends at their discretion and, at redemption, a pro rata share of the net asset value of the funds that reflects the fair value changes of the underlying investments rather than an interest payment and a principal payment that equal those of a basic lending arrangement. *[Amend the disclosure as appropriate to reflect the nature of instruments mandatorily measured at FVTPL]*

1. **Investments in debt securities at FVTPL**

Debt securities mandatorily classified as at FVTPL by the Group represent securities held for trading and securities in a ‘held to sell’ business model.

On initial recognition, the Group has irrevocably designated some of its securities at FVTPL. *[Tailor to disclose how the entity has satisfied the condition for FVTPL designation on initial recognition. ]*

Debt securities at FVTPL are carried at fair value, which also reflects any credit risk related write-downs and best represents Group’s maximum exposure to credit risk.

The debt securities at FVTPL are not collateralised. *[Otherwise disclose information about collateral as in Note 11 on loans and advances to customers.]*

At 31 December 2024 debt securities at FVTPL with a carrying value of EUR \_\_\_\_ thousand have been pledged to third parties as collateral with respect to term placements of other banks and other borrowed funds (2023: EUR \_\_\_ thousand). Refer to Notes 21 and 24. The counterparty is not allowed to sell further or repledge the investments. *[Otherwise reclassify as required by IFRS 9.3.2.23(a)]*.

9 Investments in Debt Securities (Continued)

1. **Investments in debt securities at FVOCI**

The table below contains an analysis of the credit risk exposure of debt securities measured at FVOCI at 31 December 2024, for which an ECL allowance is recognised, based on credit risk grades. Refer to Note 41 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:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***[Country] government bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Less credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Carrying value (fair value) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Municipal bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Less credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Carrying value (fair value) |  |  |  |  |  |
|  |  |  |  |  |  |

9 Investments in Debt Securities (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Corporate bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Less credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Carrying value (fair value) |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Promissory notes*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Less credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Carrying value (fair value) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities measured at FVOCI (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |

9 Investments in Debt Securities (Continued)

The table below contains an analysis of the credit risk exposure of debt securities measured at FVOCI at 31 December 2023, for which an ECL allowance is recognised, based on credit risk grades.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***[Country] government bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Less credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Carrying value (fair value) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Municipal bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Less credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Carrying value (fair value) |  |  |  |  |  |
|  |  |  |  |  |  |

9 Investments in Debt Securities (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Corporate bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Less credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Carrying value (fair value) |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Promissory notes*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Less credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Carrying value (fair value) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities measured at FVOCI (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |

The debt securities at FVOCI are not collateralised. *[Otherwise disclose information about collateral as in Note 11 on loans and advances.]*

At 31 December 2024 debt securities at FVOCI with a carrying value of EUR \_\_\_\_ thousand have been pledged to third parties as collateral with respect to term placements of other banks and other borrowed funds (2023: EUR \_\_\_\_ thousand). Refer to Notes 21 and 24. The counterparty is not allowed to sell further or repledge the investments. *[Otherwise reclassify as required by IFRS 9.3.2.23(a)]*.

9 Investments in Debt Securities (Continued)

Movements in the credit loss allowance and in the gross carrying amount of [[Country] government bonds at FVOCI] were as follows:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***[[Country] government bonds]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| FX and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2024** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

9 Investments in Debt Securities (Continued)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***[[Country] government bonds]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 1 January 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| FX and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

9 Investments in Debt Securities (Continued)

**(c) Investments in debt securities at AC**

The following table contains an analysis of debt securities at AC by credit quality at 31 December 2024 based on credit risk grades and discloses the balances by three stages for the purpose of ECL measurement. Refer to Note 41 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 AC. The carrying amount of debt securities at AC at 31 December 2024 below also represents the Group's maximum exposure to credit risk on these assets:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***[Country] government bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Municipal bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

9 Investments in Debt Securities (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Corporate bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Promissory notes*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities measured at AC (gross carrying amount)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Credit loss allowance** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities measured at AC (carrying amount)** |  |  |  |  |  |
|  |  |  |  |  |  |

9 Investments in Debt Securities (Continued)

The following table contains an analysis of debt securities at AC by credit quality at 31 December 2023.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***[Country] government bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Municipal bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

9 Investments in Debt Securities (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Corporate bonds*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Promissory notes*** |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities measured at AC (gross carrying amount)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Credit loss allowance** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities measured at AC (carrying amount)** |  |  |  |  |  |
|  |  |  |  |  |  |

The debt securities at AC as at 31 December 2024 are not collateralised (2023: not collateralised). *[Otherwise disclose information about collateral as in Note 11 on loans and advances.]*

At 31 December 2024 debt securities at AC with a carrying value of EUR \_\_\_\_ thousand have been pledged to third parties as collateral with respect to term placements of other banks and other borrowed funds (2023: \_\_\_\_ thousand). Refer to Notes 21 and 24. The counterparty is not allowed to sell further or repledge the investments. *[Otherwise reclassify as required by IFRS 9.3.2.23(a)]*.

9 Investments in Debt Securities (Continued)

Movements in the credit loss allowance and in the gross carrying amount of [[Country] government bonds at AC] were as follows:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***[[Country] government bonds]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| FX and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2024** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

9 Investments in Debt Securities (Continued)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***[[Country] government bonds]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 1 January 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| FX and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

The total amount of undiscounted ECLs at initial recognition for POCI financial assets recognised during the period was EUR \_\_\_\_\_ thousand. *[Adjust the above tables to separately disclose POCI assets, if there are any.]*

# Investments in Equity Securities

The tables below disclose investments in equity securities at 31 December 2024 and 31 December 2023 by measurement categories and classes:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Equity securities at FVTPL** | **Equity securities at FVOCI** | **Total** |
|  |  |  |  |
| Corporate shares |  |  |  |
| American depositary receipts (ADR) |  |  |  |
|  |  |  |  |
| Global depositary receipts (GDR) |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total investments in equity securities at 31 December 2024** |  |  |  |
|  |  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Equity securities at FVTPL** | **Equity securities at FVOCI** | **Total** |
|  |  |  |  |
| Corporate shares |  |  |  |
| American depositary receipts (ADR) |  |  |  |
|  |  |  |  |
| Global depositary receipts (GDR) |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total investments in equity securities at 31 December 2023** |  |  |  |
|  |  |  |  |

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.

[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.]

1. **Investments in equity securities at FVTPL**

Equity securities at FVTPL represent securities held for trading and other equity securities for which FVOCI election was not made on initial recognition.

At 31 December 2024 securities with a fair value of EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) have been pledged to third parties as collateral with respect to term placements of other banks and other borrowed funds. Refer to Notes 21 and 24.

**10 Investments in Equity Securities (Continued)**

1. **Investments in equity securities at FVOCI**

The Group designated investments disclosed in the following table as equity securities at FVOCI. The FVOCI designation was made because the investments are expected to be held for strategic purposes rather than with a view to profit on a subsequent sale and there are no plans to dispose of these investments in the short or medium term. This designation is irrevocable.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Fair value at**  **31 December 2024** | **Dividend income recognised for 2024** | **Fair value at**  **31 December 2023** | **Dividend income recognised for 2024** |
|  |  |  |  |  |
| Investment in [Name] Company ordinary shares |  |  |  |  |
| Investment in [Name] Company ordinary shares |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Total investments in equity securities at FVOCI** |  |  |  |  |
|  |  |  |  |  |

At 31 December 2024 securities at FVOCI include equity securities with a carrying value of EUR \_\_\_\_ thousand which are not publicly traded (2023: EUR \_\_\_\_ thousand). Due to the nature of the local financial markets, it is not possible to obtain current market value for these investments. For these investments, fair value is estimated by reference to the discounted operating cash flows of the investee [, the earnings of the investee, the investee’s net asset value]. Refer to Note 49. For other investments traded in active markets, fair value is determined by reference to the [quoted bid] price at the end of the reporting period.

[None of these strategic investments was disposed of during 2024, and there were no transfers of any cumulative gain or loss within equity relating to these investments.] [In 2024, the Group sold its investment in shares of \_\_\_\_\_ [name] with fair value of EUR \_\_\_\_ thousand due to a change in the Group’s strategy. The Group realised a gain of EUR \_\_\_\_\_ thousand on the sale which was transferred from FVOCI revaluation reserve to retained earnings directly in equity. Dividend income recognised during the year in relation to sold shares was EUR \_\_\_\_\_ thousand.]

# Loans and Advances to Customers

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **31 December 2024** | **31 December 2023** |
|  |  |  |
| Gross carrying amount of loans and advances to customers at AC |  |  |
| Less credit loss allowance |  |  |
|  |  |  |
|  |  |  |
| **Total carrying amount of loans and advances to customers at AC** |  |  |
|  |  |  |
|  |  |  |
| Loans and advances to customers at FVTPL |  | - |
|  |  |  |
|  |  |  |
| **Total 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.]

11 Loans and Advances to Customers (Continued)

[Impairment allowances are determined based on the forward-looking ECL models. Note 41 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.]

*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.

*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.]

***[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 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”).

11 Loans and Advances to Customers (Continued)

Refer to Note 41 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 41. For financial assets that are purchased or originated credit-impaired (“POCI Assets”), the ECL is always measured as a Lifetime ECL. Note 41 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, that may include both a loan and an undrawn commitment component, the Group measures expected credit losses over the period that the Group is exposed to credit risk, that is, until the expected credit losses would be mitigated by credit risk management actions, even if that period extends beyond the maximum contractual period. This is because contractual ability to demand repayment and cancel the undrawn commitment does not limit the exposure to credit losses to such contractual notice period.

***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… *specify*]. 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.]

The Group holds a portfolio of loans and advances to customers that does not meet the SPPI requirement for AC classification under IFRS 9. *[Tailor to describe the dominant features that fail the SPPI test in more details].* As a result, these loans and advances were classified as at FVTPL from the date of initial recognition. Loans and advances to customers at FVTPL are measured taking into account the credit risk. The carrying amount presented in the statement of financial position best represents the Group's maximum exposure to credit risk arising from loans and advances to customers.

Gross carrying amount and credit loss allowance amount for loans and advances to customers at AC by classes at 31 December 2024 and 31 December 2023 are disclosed in the table below:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **31 December 2024** | | | **31 December 2023** | | |
| *In thousands of EUR* | **Gross carrying amount** | **Credit loss allowance** | **Carrying amount** | **Gross carrying amount** | **Provision for loan impairment** | **Carrying amount** |
|  |  |  |  |  |  |  |
| *Loans to corporate customers* |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Standard lending |  |  |  |  |  |  |
| Specialised lending |  |  |  |  |  |  |
| Loans to sovereigns |  |  |  |  |  |  |
| Loans to sub-sovereigns |  |  |  |  |  |  |
| Loans to SME |  |  |  |  |  |  |
| Loans to leasing companies |  |  |  |  |  |  |
| Reverse sale and repurchase agreements |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| *Loans to individuals* |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Mortgage loans |  |  |  |  |  |  |
| Consumer loans |  |  |  |  |  |  |
| Car loans |  |  |  |  |  |  |
| Credit cards |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total loans and advances to customers at AC** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

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

* Standard lending – loans issued to large commercial entities under the standard terms, mainly for working capital financing. Standard lending also includes supplier financing facilities, i.e. financing provided to large commercial entities to fund their trade payables [Specify the average turnover and other significant terms of such transaction];
* Specialised lending – loans issued to income producing real estate companies or companies realising investment projects;
* Loans to sovereigns – government’ bonds purchased or loans issued to government;
* Loans to sub-sovereigns ‒ loans issued to government regions of a sovereign or municipal organisations;
* Loans to SME – loans issued to small and medium-sized enterprises, where the Group defines such as;
* Loans to leasing companies – loans issued to leasing companies;
* Reverse sale and repurchase agreements.

The loans and advances to customers at FVTPL analysed by classes are as follows at 31 December 2024 and 31 December 2023:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **31 December 2024** | **31 December 2023** |
|  |  |  |
| *Loans to corporate customers* |  |  |
|  |  |  |
| Standard lending |  |  |
| Specialised lending |  |  |
| Loans to sovereigns |  |  |
| Loans to sub-sovereigns |  |  |
| Loans to SME |  |  |
| Loans to leasing companies |  |  |
| Reverse sale and repurchase agreements |  |  |
|  |  |  |
| *Loans to individuals* |  |  |
|  |  |  |
| Mortgage loans |  |  |
| Consumer loans |  |  |
| Car loans |  |  |
| Credit cards |  |  |
|  |  |  |
|  |  |  |
| **Total loans and advances to customers at FVTPL** |  |  |
|  |  |  |

During 2024, a loss on initial recognition of loans at rates below market in the amount of EUR \_\_\_ thousand (2023: EUR \_\_\_ thousand) has been recorded in profit or loss for the year [statement of changes in equity because it represented a distribution to the Group’s owners].

The Group has a right to sell or repledge securities with a fair value of EUR \_\_\_ thousand (2023: EUR \_\_\_ thousand) received under reverse sale and repurchase agreements. *[Tailor to disclose any material terms and conditions associated with the use of the collateral.]*

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 EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***[Standard lending]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Management overlay adjustment  Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| Foreign exchange gains and losses and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2024** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***[Standard lending]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 1 January 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| Foreign exchange gains and losses and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

The total amount of undiscounted ECLs at initial recognition for POCI financial assets recognised during the period was EUR \_\_\_\_ thousand.

*[If the Group has POCI financial instruments, the Group should disclose the changes in the credit loss allowance between the beginning and the end of the reporting period for such instruments and explain the changes in the gross carrying amount that contributed to the change in credit loss allowance. For example, it can be achieved by adding column “POCI” in the tables above.]*

11 Loans and Advances to Customers (Continued)

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 [43](#_heading=h.1egqt2p). The main movements in the table are described below:

* 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;
* Impact on the measurement of ECL due to changes to model assumptions, including changes in PDs, EADs and LGDs in the period, arising from update of inputs to ECL models;
* Unwinding of discount due to the passage of time because ECL is measured on a present value basis;
* Foreign exchange translations of assets denominated in foreign currencies and other movements; and
* Write-offs of allowances related to assets that were written off during the period.

*Factors should be tailored to the specifics of the Group.*

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 corporate customers carried at amortised cost is as follows at 31 December 2024:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Standard lending*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Specialised lending*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Loans to sovereigns*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Loans to sub-sovereigns*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Loans to SME*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Loans to leasing companies*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Reverse sale and repurchase agreements*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

The credit quality of loans to corporate customers carried at amortised cost is as follows at 31 December 2023:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Standard lending*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Specialised lending*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Loans to sovereigns*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Loans to sub-sovereigns*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| In thousands of EUR | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
| ***Loans to SME*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Loans to leasing companies*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Reverse sale and repurchase agreements*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

The credit quality of loans to individuals carried at amortised cost is as follows at 31 December 2024:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Mortgage loans*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Consumer loans*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Car loans*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Credit cards*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

The credit quality of loans to individuals carried at amortised cost is as follows at 31 December 2023:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Mortgage loans*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Consumer loans*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Car loans*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Credit cards*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

For description of the credit risk grading used in the tables above refer to Note [43](#_heading=h.1egqt2p).

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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *In thousands of EUR* | **2024** | | **2023** | |
| **Amount** | **%** | **Amount** | **%** |
|  |  |  |  |  |
| State and public organisations |  |  |  |  |
| Cities and municipalities |  |  |  |  |
| Manufacturing |  |  |  |  |
| Real estate |  |  |  |  |
| Trade |  |  |  |  |
| Agricultural |  |  |  |  |
| Individuals |  |  |  |  |
| Other |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Total loans and advances to customers carried at AC and at FVTPL** |  |  |  |  |
|  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

State and public organisations exclude government owned profit orientated businesses.

At 31 December 2024 the Group had \_\_\_\_\_ borrowers (2023: \_\_\_\_\_ borrowers) with aggregated loan amounts above EUR \_\_\_\_\_\_ thousand. The total aggregate amount of these loans was EUR \_\_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_\_ thousand) or \_\_\_\_\_% of the gross loan portfolio (2023: \_\_\_\_\_%).

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. Description of collateral held for loans to corporate customers carried at amortised cost is as follows at 31 December 2024:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stan-dard lending** | **Specia-lised lending** | **Loans to sove-reigns** | **Loans to sub-sove-reigns** | **Loans to SME** | **Loans to leasing compa-nies** | **Reverse sale and repur-chase agree-ments** | **Total** |
|  |  |  |  |  |  |  |  |  |
| Loans guaranteed by other banks |  |  |  |  |  |  |  |  |
| Loans guaranteed by other parties, including credit insurance |  |  |  |  |  |  |  |  |
| Loans collateralised by: |  |  |  |  |  |  |  |  |
| - residential real estate |  |  |  |  |  |  |  |  |
| - other real estate |  |  |  |  |  |  |  |  |
| - tradable securities |  |  |  |  |  |  |  |  |
| - cash deposits |  |  |  |  |  |  |  |  |
| - other assets |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Total |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Unsecured exposures |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total carrying value loans and advances to customers at AC (amount representing exposure to credit risk for each class of loans at AC)** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

Description of collateral held for loans to individuals carried at amortised cost is as follows at 31 December 2024:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Mortgage loans** | **Consumer loans** | **Car loans** | **Credit cards** | **Total** |
|  |  |  |  |  |  |
| Loans guaranteed by other banks |  |  |  |  |  |
| Loans guaranteed by other parties, including credit insurance |  |  |  |  |  |
| Loans collateralised by: |  |  |  |  |  |
| - residential real estate |  |  |  |  |  |
| - other real estate |  |  |  |  |  |
| - tradable securities |  |  |  |  |  |
| - cash deposits |  |  |  |  |  |
| - other assets |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Unsecured exposures |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total carrying value loans and advances to customers at AC (amount representing exposure to credit risk for each class of loans at AC)** |  |  |  |  |  |
|  |  |  |  |  |  |

Information about collateral for loans to corporate customers is as follows at 31 December 2023:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stan-dard lending** | **Speciali-sed lending** | **Loans to sovere-igns** | **Loans to sub-sove-reigns** | **Loans to SME** | **Loans to leasing compa-nies** | **Reverse sale and repur-chase agree-ments** | **Total** |
|  |  |  |  |  |  |  |  |  |
| Loans guaranteed by other banks |  |  |  |  |  |  |  |  |
| Loans guaranteed by other parties, including credit insurance |  |  |  |  |  |  |  |  |
| Loans collateralised by: |  |  |  |  |  |  |  |  |
| - residential real estate |  |  |  |  |  |  |  |  |
| - other real estate |  |  |  |  |  |  |  |  |
| - tradable securities |  |  |  |  |  |  |  |  |
| - cash deposits |  |  |  |  |  |  |  |  |
| - other assets |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Total |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Unsecured exposures |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total carrying value loans and advances to customers at AC (amount representing exposure to credit risk for each class of loans at AC)** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

Information about collateral of loans to individuals carried at amortised cost is as follows at 31 December 2023:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Mortgage loans** | **Consumer loans** | **Car loans** | **Credit cards** | **Total** |
|  |  |  |  |  |  |
| Loans guaranteed by other banks |  |  |  |  |  |
| Loans guaranteed by other parties, including credit insurance |  |  |  |  |  |
| Loans collateralised by: |  |  |  |  |  |
| - residential real estate |  |  |  |  |  |
| - other real estate |  |  |  |  |  |
| - tradable securities |  |  |  |  |  |
| - cash deposits |  |  |  |  |  |
| - other assets |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Unsecured exposures |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total carrying value loans and advances to customers at AC (amount representing exposure to credit risk for each class of loans at AC)** |  |  |  |  |  |
|  |  |  |  |  |  |

Other assets mainly include [equipment and receivables]. The disclosure above represents the lower of the carrying value of the loan or collateral taken; the remaining part is disclosed within the unsecured exposures. The carrying value of loans was allocated based on liquidity of the assets taken as collateral. *[Tailor to disclose quality of collateral and its changes due to change in collateral policies.]*

The following table provides information on carrying value of loans, for which the Group did not recognise any expected credit loss allowance because of significant excess of collateral value over the gross carrying value of these loans.

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* |  | **31 December 2024** | **31 December 2023** |
|  |  |  |  |
| *Loans to corporate customers* |  |  |  |
|  |  |  |  |
| Standard lending |  |  |  |
| Specialised lending |  |  |  |
| Loans to sovereigns |  |  |  |
| Loans to sub-sovereigns |  |  |  |
| Loans to SME |  |  |  |
| Loans to leasing companies |  |  |  |
| Reverse sale and repurchase agreements |  |  |  |
|  |  |  |  |
| *Loans to individuals* |  |  |  |
|  |  |  |  |
| Mortgage loans |  |  |  |
| Consumer loans |  |  |  |
| Car loans |  |  |  |
| Credit cards |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total significantly over-collateralised loans and advances to customers carried at AC** |  |  |  |
|  |  |  |  |

11 Loans and Advances to Customers (Continued)

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 2024 is as follows.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Over-collateralised**  **Assets** | | **Under-collateralised**  **assets** | |
| *In thousands of EUR* | **Carrying value of the assets** | **Value of collateral** | **Carrying value of the assets** | **Value of collateral** |
|  |  |  |  |  |
| ***Credit impaired assets:*** |  |  |  |  |
|  |  |  |  |  |
| *Loans to corporate customers carried at AC* |  |  |  |  |
|  |  |  |  |  |
| Standard lending |  |  |  |  |
| Specialised lending |  |  |  |  |
| Loans to sovereigns |  |  |  |  |
| Loans to sub-sovereigns |  |  |  |  |
| Loans to SME |  |  |  |  |
| Loans to leasing companies |  |  |  |  |
| Reverse sale and repurchase agreements |  |  |  |  |
|  |  |  |  |  |
| *Loans to individuals carried at AC* |  |  |  |  |
|  |  |  |  |  |
| Mortgage loans |  |  |  |  |
| Consumer loans |  |  |  |  |
| Car loans |  |  |  |  |
| Credit cards |  |  |  |  |
|  |  |  |  |  |

The effect of collateral on credit impaired assets at 31 December 2023 is as follows.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Over-collateralised**  **Assets** | | **Under-collateralised**  **assets** | |
| *In thousands of EUR* | **Carrying value of the assets** | **Value of collateral** | **Carrying value of the assets** | **Value of collateral** |
|  |  |  |  |  |
| ***Credit impaired assets:*** |  |  |  |  |
|  |  |  |  |  |
| *Loans to corporate customers carried at AC* |  |  |  |  |
|  |  |  |  |  |
| Standard lending |  |  |  |  |
| Specialised lending |  |  |  |  |
| Loans to sovereigns |  |  |  |  |
| Loans to sub-sovereigns |  |  |  |  |
| Loans to SME |  |  |  |  |
| Loans to leasing companies |  |  |  |  |
| Reverse sale and repurchase agreements |  |  |  |  |
|  |  |  |  |  |
| *Loans to individuals carried at AC* |  |  |  |  |
|  |  |  |  |  |
| Mortgage loans |  |  |  |  |
| Consumer loans |  |  |  |  |
| Car loans |  |  |  |  |
| Credit cards |  |  |  |  |
|  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

The Group obtains collateral valuation at the time of granting loans and generally updates it every [two to three] years, depending on the significance of the loan exposure. The values of collateral considered in this disclosure are after a valuation haircut of [20-50%] applied to consider liquidity and quality of the pledged assets. *[Expand to describe approach to collateral valuations / collateral policy.]*

Description of collateral held for loans to corporate customers carried at FVTPL is as follows at 31 December 2024:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stan-dard lending** | **Specia-lised lending** | **Loans to sove-reigns** | **Loans to sub-sove-reigns** | **Loans to SME** | **Loans to leasing compa-nies** | **Reverse sale and repur-chase agree-ments** | **Total** |
|  |  |  |  |  |  |  |  |  |
| Loans guaranteed by other banks |  |  |  |  |  |  |  |  |
| Loans guaranteed by other parties, including credit insurance |  |  |  |  |  |  |  |  |
| Loans collateralised by: |  |  |  |  |  |  |  |  |
| - residential real estate |  |  |  |  |  |  |  |  |
| - other real estate |  |  |  |  |  |  |  |  |
| - tradable securities |  |  |  |  |  |  |  |  |
| - cash deposits |  |  |  |  |  |  |  |  |
| - other assets |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Total |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Unsecured exposures |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total carrying value loans and advances to customers at FVTPL (amount representing exposure to credit risk for each class of loans at FVTPL)** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

Description of collateral held for loans to individuals carried at FVTPL is as follows at 31 December 2024:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Mortgage loans** | **Consumer loans** | **Car loans** | **Credit cards** | **Total** |
|  |  |  |  |  |  |
| Loans guaranteed by other banks |  |  |  |  |  |
| Loans guaranteed by other parties, including credit insurance |  |  |  |  |  |
| Loans collateralised by: |  |  |  |  |  |
| - residential real estate |  |  |  |  |  |
| - other real estate |  |  |  |  |  |
| - tradable securities |  |  |  |  |  |
| - cash deposits |  |  |  |  |  |
| - other assets |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Unsecured exposures |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total carrying value loans and advances to customers at FVTPL (amount representing exposure to credit risk for each class of loans at FVTPL)** |  |  |  |  |  |
|  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

Description of collateral held for loans to corporate customers carried at FVTPL is as follows at 31 December 2023:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stan-dard lending** | **Specia-lised lending** | **Loans to sove-reigns** | **Loans to sub-sove-reigns** | **Loans to SME** | **Loans to leasing compa-nies** | **Reverse sale and repur-chase agree-ments** | **Total** |
|  |  |  |  |  |  |  |  |  |
| Loans guaranteed by other banks |  |  |  |  |  |  |  |  |
| Loans guaranteed by other parties, including credit insurance |  |  |  |  |  |  |  |  |
| Loans collateralised by: |  |  |  |  |  |  |  |  |
| - residential real estate |  |  |  |  |  |  |  |  |
| - other real estate |  |  |  |  |  |  |  |  |
| - tradable securities |  |  |  |  |  |  |  |  |
| - cash deposits |  |  |  |  |  |  |  |  |
| - other assets |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Total |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Unsecured exposures |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total carrying value loans and advances to customers at FVTPL (amount representing exposure to credit risk for each class of loans at FVTPL)** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

Description of collateral held for loans to individuals carried at FVTPL is as follows at 31 December 2023:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Mortgage loans** | **Consumer loans** | **Car loans** | **Credit cards** | **Total** |
|  |  |  |  |  |  |
| Loans guaranteed by other banks |  |  |  |  |  |
| Loans guaranteed by other parties, including credit insurance |  |  |  |  |  |
| Loans collateralised by: |  |  |  |  |  |
| - residential real estate |  |  |  |  |  |
| - other real estate |  |  |  |  |  |
| - tradable securities |  |  |  |  |  |
| - cash deposits |  |  |  |  |  |
| - other assets |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Unsecured exposures |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total carrying value loans and advances to customers at FVTPL (amount representing exposure to credit risk for each class of loans at FVTPL)** |  |  |  |  |  |
|  |  |  |  |  |  |

Other assets mainly include [equipment and receivables]. The disclosure above represents the lower of the carrying value of the loan or collateral taken; the remaining part is disclosed within the unsecured exposures. The carrying value of loans was allocated based on liquidity of the assets taken as collateral.

11 Loans and Advances to Customers (Continued)

The extent to which collateral and other credit enhancements mitigate credit risk for financial assets carried at FVTPL, 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 is as follows at 31 December 2024.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Over-collateralised**  **Assets** | | **Under-collateralised**  **Assets** | |
| *In thousands of EUR* | **Carrying value of the assets** | **Value of collateral** | **Carrying value of the assets** | **Value of collateral** |
|  |  |  |  |  |
| ***Credit impaired assets:*** |  |  |  |  |
|  |  |  |  |  |
| *Loans to corporate customers at FVTPL* |  |  |  |  |
|  |  |  |  |  |
| Standard lending |  |  |  |  |
| Specialised lending |  |  |  |  |
| Loans to sovereigns |  |  |  |  |
| Loans to sub-sovereigns |  |  |  |  |
| Loans to SME |  |  |  |  |
| Loans to leasing companies |  |  |  |  |
| Reverse sale and repurchase agreements |  |  |  |  |
|  |  |  |  |  |
| *Loans to individuals at FVTPL* |  |  |  |  |
|  |  |  |  |  |
| Mortgage loans |  |  |  |  |
| Consumer loans |  |  |  |  |
| Car loans |  |  |  |  |
| Credit cards |  |  |  |  |
|  |  |  |  |  |

The effect of collateral on credit impaired assets is as follows at 31 December 2023.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Over-collateralised**  **Assets** | | **Under-collateralised**  **Assets** | |
| *In thousands of EUR* | **Carrying value of the assets** | **Value of collateral** | **Carrying value of the assets** | **Value of collateral** |
|  |  |  |  |  |
| ***Credit impaired assets:*** |  |  |  |  |
|  |  |  |  |  |
| *Loans to corporate customers at FVTPL* |  |  |  |  |
|  |  |  |  |  |
| Standard lending |  |  |  |  |
| Specialised lending |  |  |  |  |
| Loans to sovereigns |  |  |  |  |
| Loans to sub-sovereigns |  |  |  |  |
| Loans to SME |  |  |  |  |
| Loans to leasing companies |  |  |  |  |
| Reverse sale and repurchase agreements |  |  |  |  |
|  |  |  |  |  |
| *Loans to individuals at FVTPL* |  |  |  |  |
|  |  |  |  |  |
| Mortgage loans |  |  |  |  |
| Consumer loans |  |  |  |  |
| Car loans |  |  |  |  |
| Credit cards |  |  |  |  |
|  |  |  |  |  |

11 Loans and Advances to Customers (Continued)

The Group obtains collateral valuation at the time of granting loans and generally updates it every [two to three] years, depending on the significance of the loan exposure. The values of collateral considered in this disclosure are after a valuation haircut of [20-50%] applied to consider liquidity and quality of the pledged assets. *[Expand to describe approach to collateral valuations / collateral policy.]*

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 2024 and 31 December 2023:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* |  | **31 December 2024** | **31 December 2023** |
|  |  |  |  |
| *Loans to corporate customers* |  |  |  |
|  |  |  |  |
| Standard lending |  |  |  |
| Specialised lending |  |  |  |
| Loans to sovereigns |  |  |  |
| Loans to sub-sovereigns |  |  |  |
| Loans to SME |  |  |  |
| Loans to leasing companies |  |  |  |
| Reverse sale and repurchase agreements |  |  |  |
|  |  |  |  |
| *Loans to individuals* |  |  |  |
|  |  |  |  |
| Mortgage loans |  |  |  |
| Consumer loans |  |  |  |
| Car loans |  |  |  |
| Credit cards |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total** |  |  |  |
|  |  |  |  |

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.

Information about modifications of loans that have not resulted in derecognition is as follows:

|  |  |
| --- | --- |
| *In thousands EUR* | **Loans and advances to customers** |
|  |  |
| ***Year ended 31 December 2024*** |  |
| Amortised cost of loans with lifetime ECL immediately before contractual modification that was not a derecognition event |  |
| Gains less losses recognised in profit or loss on modifications of loans with lifetime ECL that did not lead to derecognition |  |
|  |  |
| **At 31 December 2024** |  |
| Gross carrying amount of loans that were contractually modified (without derecognition) in the past when measured at lifetime ECL and which were reclassified to Stage 1 (12 months ECL) during the current year |  |
|  |  |
| ***Year ended 31 December 2023*** |  |
| Amortised cost of loans with lifetime ECL immediately before contractual modification that was not a derecognition event |  |
| Gains less losses recognised in profit or loss on modifications of loans with lifetime ECL that did not lead to derecognition |  |
|  |  |
| **At 31 December 2023** |  |
| Gross carrying amount of loans that were contractually modified (without derecognition) in the past when measured at lifetime ECL and which were reclassified to Stage 1 (12 months ECL) during the current year |  |
|  |  |

11 Loans and Advances to Customers (Continued)

Refer to Note 49 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 41. Information on related party balances is disclosed in Note 51.

# Repurchase Receivables

Repurchase receivables represent securities sold under sale and repurchase agreements which the counterparty has the right, by contract or custom, to sell or repledge. The repurchase agreements are [short-term] in nature and mature by [ ].

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Debt securities at FVOCI sold under sale and repurchase agreements |  | - |
| Debt securities at FVTPL sold under sale and repurchase agreements |  | - |
| Equity securities at FVOCI sold under sale and repurchase agreements |  | - |
| Equity securities at FVTPL sold under sale and repurchase agreements |  | - |
| Debt securities at AC sold under sale and repurchase agreements |  | - |
|  |  |  |
|  |  |  |
| **Total repurchase receivables** |  |  |
|  |  |  |

Securities sold under sale and repurchase agreements at 31 December 2024:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Debt securities at FVOCI** | **Debt securities at FVTPL** | **Equity securities at FVOCI** | **Equity securities at FVTPL** | **Debt securities at AC** | **Total** |
|  |  |  |  |  |  |  |
| [Country] government bonds |  |  |  |  |  |  |
| Municipal bonds |  |  |  |  |  |  |
| Corporate bonds  Investments in mutual funds |  |  |  |  |  |  |
| Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total debt securities (fair value or gross carrying amount)** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Credit loss allowance | - | - | - | - |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total debt securities (carrying value)** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Corporate shares |  |  |  |  |  |  |
| American depositary receipts (ADR) |  |  |  |  |  |  |
| Investments in mutual funds |  |  |  |  |  |  |
| Global depositary receipts (GDR) |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total equity securities (carrying value)** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total securities (carrying value)** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

12 Repurchase Receivables (Continued)

Securities sold under sale and repurchase agreements at 31 December 2023:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Debt securities at FVOCI** | **Debt securities at FVTPL** | **Equity securities at FVOCI** | **Equity securities at FVTPL** | **Debt securities at AC** | **Total** |
|  |  |  |  |  |  |  |
| [Country] government bonds |  |  |  |  |  |  |
| Municipal bonds |  |  |  |  |  |  |
| Corporate bonds  Investments in mutual funds |  |  |  |  |  |  |
| Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total debt securities (fair value or gross carrying amount)** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Credit loss allowance | - | - | - | - |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total debt securities (carrying value)** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Corporate shares |  |  |  |  |  |  |
| American depositary receipts (ADR) |  |  |  |  |  |  |
| Investments in mutual funds |  |  |  |  |  |  |
| Global depositary receipts (GDR) |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total equity securities (carrying value)** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total securities (carrying value)** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

The debt securities are not collateralised. *[Otherwise disclose information about collateral as in Note 11 on loans and advances to customers.]*

[Sale and repurchase agreements (“repo agreements”), which effectively provide a lender’s return to the counterparty, are treated as secured financing transactions. Securities sold under such sale and repurchase agreements are not derecognised. The securities are reclassified as repurchase receivables in the statement of financial position if the transferee has the right by contract or custom to sell or repledge the securities. The corresponding liability is presented within amounts due to other banks or other borrowed funds.

Securities purchased under agreements to resell (“reverse repo agreements”), which effectively provide a lender’s return to the Group, are recorded as due from other banks or loans and advances to customers, as appropriate. The difference between the sale and repurchase price, adjusted by interest and dividend income collected by the counterparty, is treated as interest income and accrued over the life of repo agreements using the effective interest method.

Securities lent to counterparties for a fixed fee are retained in the [consolidated] financial statements in their original category in the statement of financial position unless the counterparty has the right by contract or custom to sell or repledge the securities, in which case they are reclassified and presented separately. Securities borrowed for a fixed fee are not recorded in the [consolidated] financial statements, unless these are sold to third parties, in which case the purchase and sale are recorded in profit or loss for the year within gains less losses arising from trading securities. The obligation to return the securities is recorded at fair value in other borrowed funds.

12 Repurchase Receivables (Continued)

Based on classification of securities sold under the sale and repurchase agreements, the Group classifies repurchase receivables into one of the following measurement categories: AC, FVOCI, and FVTPL.]

Analysis by credit quality of debt securities at FVOCI that were transferred in a sale and repurchase agreement is as follows at 31 December 2024.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***[Country] government bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Including: credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying value (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Municipal bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Including: credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying value (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |

12 Repurchase Receivables (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Corporate bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Including: credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying value (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Promissory notes*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Including: credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying value (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities at FVOCI sold under sale and repurchase agreements (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |

12 Repurchase Receivables (Continued)

Analysis by credit quality of debt securities at FVOCI that were transferred in a sale and repurchase agreement is as follows at 31 December 2023:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***[Country] government bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Including: credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying value (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Municipal bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Including: credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying value (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |

12 Repurchase Receivables (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Corporate bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Including: credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying value (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Promissory notes*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total AC gross carrying amount |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Including: credit loss allowance |  |  |  |  |  |
| Less fair value adjustment from AC to FV |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying value (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities at FVOCI sold under sale and repurchase agreements (fair value)** |  |  |  |  |  |
|  |  |  |  |  |  |

12 Repurchase Receivables (Continued)

Analysis by credit quality of debt securities at AC that were transferred in a sale and repurchase agreement is as follows at 31 December 2024.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***[Country] government bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Municipal bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

12 Repurchase Receivables (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Corporate bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Promissory notes*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities at AC sold under sale and repurchase agreements (gross value)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities at AC sold under sale and repurchase agreements (carrying value)** |  |  |  |  |  |
|  |  |  |  |  |  |

12 Repurchase Receivables (Continued)

Analysis by credit quality of debt securities at AC that were transferred in a sale and repurchase agreement is as follows at 31 December 2023:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***[Country] government bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Municipal bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

12 Repurchase Receivables (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Corporate bonds*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Promissory notes*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities at AC sold under sale and repurchase agreements (gross value)** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total investments in debt securities at AC sold under sale and repurchase agreements (carrying value)** |  |  |  |  |  |
|  |  |  |  |  |  |

The total amount of undiscounted ECLs at initial recognition for POCI financial assets recognised during 2024 was EUR [ ] thousand (2023: EUR \_\_\_\_ thousand). Refer to Note 41 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 the debt securities.

12 Repurchase Receivables (Continued)

Movements in the credit loss allowance and in the gross amortised cost amount of [[Country] government bonds at FVOCI] were as follows.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***[[Country] government bonds]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| FX and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for  Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2024** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

12 Repurchase Receivables (Continued)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***[[Country] government bonds]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 1 January 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| FX and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount  (for Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

*[If the Group has POCI financial instruments, the Group should disclose the changes in the credit loss allowance between the beginning and the end of the reporting period for such instruments and explain the changes in the gross carrying amount that contributed to the change in credit loss allowance. For example, it can be achieved by adding column “POCI” in the table above.]*

12 Repurchase Receivables (Continued)

Movements in the credit loss allowance and in the gross amortised cost amount of [[Country] government bonds carried at AC] were as follows.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***[[Country] government bonds]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| FX and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for  Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2024** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

12 Repurchase Receivables (Continued)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |  |  |
| ***[[Country] government bonds]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 1 January 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| FX and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for  Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

*[If the Group has POCI financial instruments, the Group should disclose the changes in the credit loss allowance between the beginning and the end of the reporting period for such instruments and explain the changes in the gross carrying amount that contributed to the change in credit loss allowance. For example, it can be achieved by adding column “POCI” in the table above.]*

12 Repurchase Receivables (Continued)

Securities at FVTPL classified as repurchase receivables were provided as collateral under sale and repurchase agreements and the Group, therefore, has an additional credit risk exposure relating to the repurchase of the securities. The counterparty bank belongs to [the top 20] banks operating in the Eurozone with rating \_\_\_\_\_ by [Standard & Poor’s / Moody’s].

The carrying amount of financial assets that the Group reclassified as repurchase receivables during 2024 was EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand).

Refer to Note 49 for the disclosure of the fair value of each class of repurchase receivables. Securities at FVTPL and securities at FVOCI reclassified to repurchase receivables continue to be carried at fair value in accordance with accounting policies for these categories of assets.

Interest rate analysis of securities classified as repurchase receivables is disclosed in Note 41. Information on related party debt securities is disclosed in Note 51.

# Investment Properties

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* |  | **2024** | **2023** |
|  |  |  |  |
| **Investment properties at fair value at 1 January** |  |  |  |
|  |  |  |  |
| Additions |  |  |  |
| Expenditure on technical enhancements |  |  |  |
| Additions through business combinations | 52 |  |  |
| Transfer to non-current assets held for sale (or disposal groups) | 20 |  |  |
| Disposals |  |  |  |
| Transfer to owner-occupied premises | 15 |  |  |
| Transfer from owner-occupied premises | 15 |  |  |
| Transfer to other assets |  |  |  |
| Fair value gains/(losses) | 34 |  |  |
| Other |  |  |  |
| [Effect of translation to presentation currency] |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Investment properties at fair value at 31 December** |  |  |  |
|  |  |  |  |

Investment property is property held by the Group (owned or held as a right-of-use asset under a lease) 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 property is initially recognised at cost, including transaction costs, and subsequently remeasured at fair value updated to reflect market conditions at the end of the reporting period. Fair value of investment property is the price that would be received from sale of the asset in an orderly transaction, without deduction of any transaction costs.

Fair value of the Group’s investment property is determined based on reports of independent appraisers, who hold a recognised and relevant professional qualification and who have recent experience in valuation of property of similar location and category. *[If valuation is done by the entity’s staff, amend wording accordingly and disclose that professional valuers were not involved – see IAS 40.75(e).]*

[Investment property represents industrial land and buildings that the Group valued using its expectation to convert them into a residential complex.] *[Tailor to disclose if highest and best use differs from current use.]*

Earned rental income is recorded in profit or loss for the year within [other operating income]. Gains and losses resulting from changes in the fair value of investment property are recorded in profit or loss for the year and presented separately. *[Refer to Appendix D for an extended accounting policy if investment properties are material.]*

13 Investment Properties (Continued)

*[Alternative policy ‒ cost model:* 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.

Subsequent expenditure is capitalised only when it is probable that future economic benefits associated with it will flow to the Group, and the cost can be measured reliably. All other repairs and maintenance costs are expensed when incurred. If an investment property becomes owner-occupied, it is reclassified to premises and equipment.]

[The Group did not classify any right-of-use assets, where the underlying properties were sub-let, as investment properties in 2024 (2023: nil.)] The investment properties are valued annually on 31 December at fair value, by an independent, professionally qualified appraiser who has recent experience in valuing similar properties in [Country]. The methods and significant assumptions applied in determining the fair value were *[Tailor to describe methods and assumptions, e.g. capitalisation rate used.]*

Valuations of properties obtained from independent professionally qualified appraisers were adjusted for the purpose of the [consolidated] financial statements to avoid double-counting of assets and liabilities that are recognised separately from the valuation in the statement of financial position. Reconciliation between the valuations obtained and the carrying amount of investment properties, is as follows:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Note** | | **31 December**  **2024** | **31 December**  **2023** |
|  | |  |  |  |
| **Valuations obtained** | |  |  |  |
| Less future construction costs and developers profit deducted from properties valued on an “as if complete” basis | |  |  |  |
| Less accrued rental income recognised as a separate asset | |  |  |  |
| Plus lease liabilities recognised for investment properties held under leases | |  |  |  |
|  | |  |  |  |
|  | |  |  |  |
| **Fair value in the statement of financial position** | |  |  |  |
|  | |  |  |  |

[Investment properties with a carrying value of EUR \_\_\_ thousand (2023: EUR \_\_\_ thousand) were fully completed and in use at the end of the reporting period. The properties are required to comply with relevant health and safety and other environmental requirements, subject to ongoing self-certification and periodic inspections from independent oversight bodies, in order to continue in operation. Management considers that the Group’s completed properties comply substantially with all relevant requirements, and based on the Group’s historical experience, all properties are expected to continue to be approved for ongoing use.]

13 Investment Properties (Continued)

At 31 December 2024, investment properties carried at EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) have been pledged to third parties as collateral with respect to [other borrowed funds]. Refer to Note [24]. *[Tailor to disclose the existence and amounts of any other restrictions on the realisability of investment property or the remittance of income and proceeds of disposal.]*

Where the Group is the lessor, the future minimum lease payments receivable under non-cancellable operating leases are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **31 December**  **2024** | **31 December**  **2023** |
|  |  |  |
| Not later than 1 year |  |  |
| Later than 1 year and not later than 2 years |  |  |
| Later than 2 years and not later than 3 years |  |  |
| Later than 3 years and not later than 4 years |  |  |
| Later than 4 years and not later than 5 years |  |  |
| Later than 5 years |  |  |
|  |  |  |
|  |  |  |
| **Total future operating lease payments receivable at 31 December** |  |  |
|  |  |  |

Total variable lease payments receivable that are not based on an index or rate recognised as income under the Group’s non-cancellable operating leases were EUR \_\_\_\_\_ thousand (2023: total contingent rent payments receivable recognised as income under the Group’s non-cancellable operating leases were EUR \_\_\_\_\_ thousand).

# Investment in Associates

The table below summarises the movements in the carrying amount of the Group’s investment in associates.

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* |  | **2024** | **2023** |
|  |  |  |  |
| **Carrying amount at 1 January** |  |  |  |
|  |  |  |  |
| Fair value of net assets of associate acquired |  |  |  |
| Goodwill arising on acquisition of associate |  |  |  |
| Share of profit of associates |  |  |  |
| Share of other equity movements of associates |  |  |  |
| Dividends from associates |  |  |  |
| Impairment of investments in associates |  |  |  |
| [Translation to presentation currency] |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Carrying amount at 31 December** |  |  |  |
|  |  |  |  |

14 Investment in Associates (Continued)

The Group’s interests in its principal associates were as follows:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **2024** | | **2023** | |
| **Name** | **% ownership interest**  **held (% of voting rights if different)** | **Place of business (country of**  **incorporation if different)** | **% ownership interest**  **held (% of voting rights if different)** | **Place of business (country of**  **incorporation if different)** |
|  |  |  |  |  |
| [Associate X] |  |  |  |  |
| [Associate Y] |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Total** |  |  |  |  |
|  |  |  |  |  |

***[Associates***. Associates are entities over which the Group has significant influence (directly or indirectly), but not control, generally accompanying a shareholding of between 20 and 50 percent of the voting rights. Investments in associates are accounted for using the equity method of accounting and are initially recognised at cost. The carrying amount of associates includes goodwill identified on acquisition less accumulated credit losses, if any. Dividends received from associates reduce the carrying value of the investment in associates. Other post-acquisition changes in Group’s share of net assets of an associate are recognised as follows: (i) the Group’s share of profits or losses of associates is recorded in the consolidated profit or loss for the year as share of result of associates, (ii) the Group’s share of other comprehensive income is recognised in other comprehensive income and presented separately, (iii); all other changes in the Group’s share of the carrying value of net assets of associates are recognised in profit or loss within the share of result of associates. However, when the Group’s share of losses in an associate equals or exceeds its interest in the associate, including any other unsecured receivables, the Group does not recognise further losses, unless it has incurred obligations or made payments on behalf of the associate.

Unrealised gains on transactions between the Group and its associates are eliminated to the extent of the Group’s interest in the associates; unrealised losses are also eliminated unless the transaction provides evidence of an impairment of the asset transferred.

The Group applies the impairment requirements in IFRS 9 to long-term loans, preference shares and similar long-term interest that in substance form part of the investment in associate before reducing the carrying value of the investment by a share of a loss of the investee that exceeds the amount of the Group’s interest in the ordinary shares.]

14 Investment in Associates (Continued)

***[Disposals of associates.*** When the Group ceases to have significant influence, any retained interest in the entity is remeasured to its fair value, with the change in carrying amount recognised in profit or loss. The fair value is the initial carrying amount for the purposes of subsequently accounting for the retained interest as a financial asset. In addition, any amounts previously recognised in other comprehensive income in respect of that entity, are accounted for as if the Group had directly disposed of the related assets or liabilities. This may mean that amounts previously recognised in other comprehensive income are recycled to profit or loss.

If the ownership interest in an associate is reduced but significant influence is retained, only a proportionate share of the amounts previously recognised in other comprehensive income are reclassified to profit or loss, where appropriate.]

*[Tailor to disclose here the nature of the entity’s relationship with each associate (by, for example, describing the nature of the activities of the associate and whether it is strategic to the entity’s activities) ‒ IFRS 12.21]*

Summarised financial information of each material associate is as follows at 31 December 2024:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Associate X** | **Associate Y** | **Other individually immaterial associates** | **Total associates** |
|  |  |  |  |  |
| Current assets |  |  |  |  |
| Non-current assets |  |  |  |  |
| Current liabilities |  |  |  |  |
| Non-current liabilities |  |  |  |  |
| Revenue |  |  |  |  |
| Profit or loss from continuing operations |  |  |  |  |
| Profit or loss from discontinued operations |  |  |  |  |
| Other comprehensive income |  |  |  |  |
| Total comprehensive income |  |  |  |  |
|  |  |  |  |  |

Summarised financial information of each material associate is as follows at 31 December 2023:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Associate X** | **Associate Y** | **Other individually immaterial associates** | **Total associates** |
|  |  |  |  |  |
| Current assets |  |  |  |  |
| Non-current assets |  |  |  |  |
| Current liabilities |  |  |  |  |
| Non-current liabilities |  |  |  |  |
| Revenue |  |  |  |  |
| Profit or loss from continuing operations |  |  |  |  |
| Profit or loss from discontinued operations |  |  |  |  |
| Other comprehensive income |  |  |  |  |
| Total comprehensive income |  |  |  |  |
|  |  |  |  |  |

The only reconciling difference between the above amounts and the carrying amount of the investments in associates is elimination of the ownership interest held by the other investors in the associates.

The fair value of the Group’s investment in its associate \_\_\_\_\_, which is listed, is EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand).

14 Investment in Associates (Continued)

[Associate X] has outstanding borrowing from a third party bank that includes a clause restricting payment of dividends to the investors without the lender’s approval. *[Tailor to disclose the nature and extent of any significant restrictions on the ability of associates to transfer funds to the entity in the form of cash dividends, or to repay loans or advances made by the entity – IFRS 12.22]*

The Group’s share of contingent liabilities of the associates was EUR \_\_\_\_\_ thousand at 31 December 2024 (2023: EUR \_\_\_\_\_ thousand). In addition, the Group’s contingent liabilities related to the associates incurred jointly with the other investors in the associate amount to EUR \_\_\_\_\_ thousand at 31 December 2024 (2023: EUR \_\_\_\_\_ thousand).

The carrying value of the Group’s investment in associate \_\_\_\_\_ is nil. The unrecognised share of loss of this associate is EUR \_\_\_\_\_ thousand for 2024 (2023: EUR \_\_\_\_\_ thousand). Cumulatively, the unrecognised share of losses of this associate is EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand).

# Other Financial Assets

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **2024** | **2023** |
|  |  |  |  |
| *Other financial assets at AC* |  |  |  |
|  |  |  |  |
| Trade receivables from contracts with customers |  |  |  |
| Finance lease receivables |  |  |  |
| Credit and debit cards receivables |  |  |  |
| Settlements on conversion operations |  |  |  |
| Restricted cash |  |  |  |
| Other |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Less credit loss allowance |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total other financial assets at AC** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| *Other financial assets at FVTPL* |  |  |  |
|  |  |  |  |
| Foreign exchange forward contracts | [50](#_heading=h.2r0uhxc) |  |  |
| Precious metals forward contracts | [50](#_heading=h.2r0uhxc) |  |  |
| Other financial derivatives | [50](#_heading=h.2r0uhxc) |  |  |
| Other |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total other financial assets at FVTPL** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total other financial assets** |  |  |  |
|  |  |  |  |

***Restricted cash*** represents balances on correspondent accounts with foreign banks placed by the Group on behalf of its customers. The Group does not have the right to use these funds for the purposes of funding its own activities. The Group has received restricted deposits from these customers in the same amounts which are recorded in customer accounts*.*

15 Other Financial Assets (Continued)

***[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] / [by applying the rate implicit in the lease to (i) the gross book value of lease receivables in stage 1 and 2 and (ii) net carrying amount of lease receivables in stage 3 of the ECL model]. 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 [except for certain subsidiaries of the Group which act as manufacturer or dealer lessors, in which case such costs are expensed as part of the selling profit similarly to outright sales.] Finance income from leases is recorded within [Other similar income] [other operating income] in profit or loss.

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.]

The table below contains an analysis of the credit risk exposure of other financial assets at AC except for trade receivables. The carrying amount of other financial assets at AC at 31 December 2024 below also represents the Group's maximum exposure to credit risk on these assets:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
|  |  |  |  |  |  |
| ***Finance lease receivables*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

15 Other Financial Assets (Continued)

| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **POCI** | **Total** |
| --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |
| ***Credit and debit cards receivables*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Settlements on conversion operations*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Restricted cash*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent  - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

15 Other Financial Assets (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| ***Other*** |  |  |  |  |  |
|  |  |  |  |  |  |
| - Excellent |  |  |  |  |  |
| - Good |  |  |  |  |  |
| - Satisfactory |  |  |  |  |  |
| - Special monitoring |  |  |  |  |  |
| - Default |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Gross carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Carrying amount** |  |  |  |  |  |
|  |  |  |  |  |  |

The credit loss allowance for trade receivables is determined according to provision matrix presented in the table below. The provision matrix is based the number of days that an asset is past due, adjusted for *[describe forward looking information – the impact of the forward-looking information is likely to be more significant due to current macro-economic slowdown situation and/or the war in Ukraine].*

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **31 December 2024** | | | **31 December 2023** | | |
| *In % of gross value* | **Loss**  **rate** | **Gross**  **carrying**  **amount** | **Lifetime**  **ECL** | **Loss**  **rate** | **Gross**  **carrying**  **amount** | **Lifetime**  **ECL** |
|  |  |  |  |  |  |  |
| ***Trade receivables***  - current | *[%]* |  |  | *[%]* |  |  |
| - less than 30 days overdue | *[%]* |  |  | *[%]* |  |  |
| - 30 to 90 days overdue | *[%]* |  |  | *[%]* |  |  |
| - 91 to 180 days overdue | *[%]* |  |  | *[%]* |  |  |
| - 181 to 360 days overdue | *[%]* |  |  | *[%]* |  |  |
| - over 360 days overdue | *[%]* |  |  | *[%]* |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total trade receivables (gross carrying amount)** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total trade receivables from contracts with customers (carrying amount)** |  |  |  |  |  |  |

The total amount of undiscounted ECLs at initial recognition for POCI financial assets recognised during the period was EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand). *[If there are POCI assets, add POCI columns to the above table to show POCI items separately.]*

15 Other Financial Assets (Continued)

The following tables explain the changes in the gross carrying amount and in the credit loss allowance for other financial assets under simplified ECL model between the beginning and the end of the current and comparative annual periods

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **2024** | | | **2023** | | |
| *In thousands of EUR* | **Gross carrying amount** | **Credit loss allowance** | **Total** | **Gross carrying amount** | **Credit loss allowance** | **Total** |
|  |  |  |  |  |  |  |
| ***Trade receivables*** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Balance at 1 January** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |
| Financial assets derecognised during the period |  |  |  |  |  |  |
| Changes in estimates and assumptions |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Total credit loss allowance charge in profit or loss for the period | - |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |
| Foreign exchange gains and losses |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Balance at 31 December** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

15 Other Financial Assets (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 EUR* | **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 receivables]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| Foreign exchange gains and losses and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for  Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2024** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

15 Other Financial Assets (Continued)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Credit loss allowance** | | | | **Gross carrying amount** | | | |
| *In thousands of EUR* | **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 receivables]*** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 1 January 2023** |  |  |  |  |  |  |  |  |
| *Movements with impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| Transfers: |  |  |  |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |  |  |  |
| - 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) |  |  |  |  |  |  |  |  |
| New originated or purchased |  |  |  |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |  |  |  |
| Changes to ECL measurement model assumptions |  |  |  |  |  |  |  |  |
| Unwinding of discount |  |  |  |  |  |  |  |  |
| Changes in accrued interest |  |  |  |  |  |  |  |  |
| Other movements |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total movements with impact on credit loss allowance charge for the period** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| *Movements without impact on credit loss allowance charge for the period:* |  |  |  |  |  |  |  |  |
| Write-offs |  |  |  |  |  |  |  |  |
| Foreign exchange gains and losses and other movements |  |  |  |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |  |  |  |
| Unwinding of discount (for  Stage 3) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

*[If the Group has POCI financial instruments, the Group should disclose the changes in the credit loss allowance between the beginning and the end of the reporting period for such instruments and explain the changes in the gross carrying amount that contributed to the change in credit loss allowance. For example, it can be achieved by adding column “POCI” in the table above.]*

15 Other Financial Assets (Continued)

Finance lease receivables of EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) and EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) relate to leases of equipment and real estate, respectively.

Description of collateral held is as follows at 31 December 2024:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Finance lease receivables** | **Other recei-vables** | **Total** |
|  |  |  |  |
| Guaranteed by other banks |  |  |  |
| Guaranteed by other parties, including credit insurance |  |  |  |
| Residential real estate |  |  |  |
| Other real estate |  |  |  |
| Tradable securities |  |  |  |
| Cash deposits |  |  |  |
| Cars or other equipment |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Total |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Unsecured exposures |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total carrying value at AC (amount representing exposure to credit risk for the respective class at AC)** |  |  |  |
|  |  |  |  |

Description of collateral held is as follows at 31 December 2023:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Finance lease receivables** | **Other recei-vables** | **Total** |
|  |  |  |  |
| Guaranteed by other banks |  |  |  |
| Guaranteed by other parties, including credit insurance |  |  |  |
| Residential real estate |  |  |  |
| Other real estate |  |  |  |
| Tradable securities |  |  |  |
| Cash deposits |  |  |  |
| Cars or other equipment |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Total |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Unsecured exposures |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total carrying value at AC (amount representing exposure to credit risk for the respective class at AC)** |  |  |  |
|  |  |  |  |

15 Other Financial Assets (Continued)

The extent to which collateral and other credit enhancements mitigate credit risk for assets 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 2024 is as follows.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Over-collateralised**  **assets** | | **Under-collateralised**  **assets** | |
| *In thousands of EUR* | **Carrying value of the assets** | **Value of collateral** | **Carrying value of the assets** | **Value of collateral** |
|  |  |  |  |  |
| ***Credit impaired assets:*** |  |  |  |  |
|  |  |  |  |  |
| Finance lease receivables |  |  |  |  |
| Other receivables/assets |  |  |  |  |
|  |  |  |  |  |

The effect of collateral on credit impaired assets at 31 December 2023 is as follows.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Over-collateralised**  **assets** | | **Under-collateralised**  **assets** | |
| *In thousands of EUR* | **Carrying value of the assets** | **Value of collateral** | **Carrying value of the assets** | **Value of collateral** |
|  |  |  |  |  |
| ***Credit impaired assets:*** |  |  |  |  |
|  |  |  |  |  |
| Finance lease receivables |  |  |  |  |
| Other receivables/assets |  |  |  |  |
|  |  |  |  |  |

The Group obtains collateral valuation at the time of granting loans and generally updates it every [two to three] years, depending on the significance of the loan exposure. The values of collateral considered in this disclosure are after a valuation haircut of [20-50%] applied to consider liquidity and quality of the pledged assets. *[Expand to describe approach to collateral valuations / collateral policy.]*

Trade receivables, finance lease receivables, credit and debit cards receivables, settlements on conversion operations and restricted cash balances are not collateralised. *[Otherwise disclose information about collateral as in Note 11 on loans and advances also for these other assets.]*

15 Other Financial Assets (Continued)

Finance lease payments receivable (gross investment in the leases) and their present values are as follows:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Due within**  **1 year** | **Due between**  **1 and 2 years** | **Due between**  **2 and 3 years** | **Due between**  **3 and 4 years** | **Due between**  **4 and 5 years** | **Due after**  **5 years** | **Total** |
|  |  |  |  |  |  |  |  |
| **Finance lease payments receivable at 31 December 2024** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Unearned finance income |  |  |  |  |  |  |  |
| Unguaranteed residual value |  |  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **Present value of lease payments receivable at 31 December 2024** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **Finance lease payments receivable at 31 December 2023** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Unearned finance income |  |  |  |  |  |  |  |
| Unguaranteed residual value |  |  |  |  |  |  |  |
| Impairment loss provision |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **Present value of lease payments receivable at 31 December 2023** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

The Group owns [equipment] of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) obtained by terminating finance leases of counterparties which were in breach of their contractual obligations, primarily as a result of overdue lease payments. Refer to Note 16.

Refer to Note 49 for the disclosure of the fair value of each class of other financial assets. Information on related party balances is disclosed in Note 51.

# Other Assets

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **2024** | **2023** |
|  |  |  |  |
| Prepayments for construction in progress |  |  |  |
| Prepayments for services |  |  |  |
| Repossessed collateral |  |  |  |
| Precious metals |  |  |  |
| Other |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total other assets** |  |  |  |
|  |  |  |  |

16 Other Assets (Continued)

[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 foreseeable future. The repossessed real estate assets do not meet the definition of non-current assets held for sale, and are classified as inventories in accordance with IAS 2 “Inventories”. The assets were initially recognised at fair value when acquired.

[***Precious metals.*** The Group has a practice of taking delivery of precious metals and selling them within a short period after delivery, for the purpose of generating a profit from short-term fluctuations in price or dealer’s margin. Precious metals are carried at the lower of cost or net realisable value.] [Precious metals are held by the Group’s commodity broker-trader subsidiary and are measured at fair value less costs to sell with gains or losses recognised in profit or loss.]

***[Land development and resale.*** The Group’s subsidiary develops and sells residential properties. Revenue is recognised when control over the property has been transferred to the customer. The properties have generally no alternative use for the Group due to contractual restrictions. However, an enforceable right to payment does not arise until legal title has passed to the customer. Therefore, revenue is recognised at a point in time when the legal title passes to the customer. Revenue is measured at the transaction price agreed in the contract. In most cases, the consideration is due when the legal title has been transferred. While deferred payment terms may be agreed in some circumstances, the deferral never exceeds twelve months. The transaction price is therefore not adjusted for the effects of a significant financing component. The revenue on the land development and resale is recognised within [other operating income in profit or loss].

All of the above assets are expected to be recovered more than twelve months after the year-end, except for prepayments for services of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) and precious metals of EUR \_\_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). Information on related party balances is disclosed in Note 51.

# Goodwill

Movements in goodwill arising on the acquisition of subsidiaries are:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **2024** | **2023** |
|  |  |  |  |
| Gross book value at 1 January |  |  |  |
| Accumulated impairment losses at 1 January |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Carrying amount at 1 January** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Acquisition of subsidiary | 52 |  |  |
| Transfer to non-current assets held for sale (or disposal groups) | 20 |  |  |
| Disposal of subsidiary |  |  |  |
| Impairment loss | 35 |  |  |
| [Effect of translation to presentation currency] |  |  |  |
| Other |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Carrying amount at 31 December** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Gross book value at 31 December |  |  |  |
| Accumulated impairment losses at 31 December |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Carrying amount at 31 December** |  |  |  |
|  |  |  |  |

17 Goodwill (Continued)

***[***Goodwill is carried at cost less accumulated impairment losses, if any. The Group tests goodwill for impairment at least annually and whenever there are indications that goodwill may be impaired. Goodwill is allocated to the cash-generating units, or groups of cash-generating units, that are expected to benefit from the synergies of the business combination. Such units or group of units represent the lowest level at which the Group monitors goodwill and are not larger than an operating segment. Gains or losses on disposal of an operation within a cash generating unit to which goodwill has been allocated include the carrying amount of goodwill associated with the disposed operation, generally measured on the basis of the relative values of the disposed operation and the portion of the cash-generating unit which is retained.]

*Goodwill Impairment Test*

Goodwill is allocated to cash-generating units (CGUs, which represent the lowest level within the Group at which goodwill is monitored by management and which are not larger than a segment), as follows:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* |  | **2024** | **2023** |
|  |  |  |  |
| [CGU 1] |  |  |  |
| [CGU 2] |  |  |  |
| [CGU 3] |  |  |  |
| […] |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total carrying amount of goodwill** |  |  |  |
|  |  |  |  |

*[If some or all of the carrying amount of goodwill is allocated across multiple CGUs (or groups of CGUs) and the amount allocated to each CGU (or group of CGUs) is not individually significant, that fact should be disclosed, together with the aggregate carrying amount of goodwill allocated to those CGUs (or group of CGUs). Refer to IAS 36.135 for additional required disclosures if goodwill is allocated across multiple CGUs (or groups of CGUs)]*

*[If any portion of the goodwill acquired in a business combination during the reporting period has not been allocated to a CGU at the end of the reporting period (IAS 36.84), disclose the amount of the unallocated goodwill, together with the reasons why that amount remains unallocated.]*

*[The disclosures below only cover situations when the recoverable amount is value in use. If fair value less costs to sell is higher than value in use, refer to IAS 36.134(e) for required disclosures.]*

The recoverable amount of each CGU was determined based on value-in-use calculations. These calculations use cash flow projections based on financial budgets approved by management covering a five-year period. *[Tailor to disclose why period of more than 5 years would be justified – IAS 36.134(d)(iii).]* Cash flows beyond the five-year period are extrapolated using the estimated growth rates stated below.

The growth rates do not exceed the long-term average growth rate for the business sector of the economy in which the CGU operates.

Assumptions used for value-in-use calculations to which the recoverable amount is most sensitive were:

|  |  |  |  |
| --- | --- | --- | --- |
|  |  | **2024** | **2023** |
|  |  |  |  |
|  |  |  |  |
| Growth rate beyond five years |  | X% p.a. | Y% p.a. |
| Pre-tax discount rate |  | X% p.a. | Y% p.a. |
| [.......] |  |  |  |
|  |  |  |  |

17 Goodwill (Continued)

Management determined budgeted gross margin based on past performance and its market expectations. The weighted average growth rates used are consistent with the forecasts included in industry reports. *[: Tailor to disclose separately the assumptions for each CGU for which the allocated carrying amount of goodwill is significant in comparison to the entity’s total goodwill. Describe Management’s approach to developing each assumption, whether assumptions reflect past experience or whether they are consistent with external sources of information. Describe if and why assumptions differ from past experience or external sources of information. Refer to IAS 36.134(d)(i) and (ii)]*

The discount rates used are pre-tax, and reflect specific risks relating to the relevant CGUs. If the revised estimated pre-tax discount rate applied to the discounted cash flows of \_\_\_\_\_ CGU had been \_\_\_\_\_ % higher than management’s estimates, the Group would need to reduce the carrying value of goodwill by EUR \_\_\_\_\_ thousand, and premises and equipment by EUR \_\_\_\_\_ thousand. Had this impairment been recognised, the Group would not be able to reverse any Credit loss allowance that arose on goodwill in subsequent periods, even if circumstances improve. The recoverable amount of \_\_\_\_\_ CGU exceeds its carrying amount by EUR \_\_\_\_\_ thousand. The CGUs’ carrying amount would be equal to value in use at a discount rate of \_\_\_\_\_ % p.a. *[Tailor to describe sensitivity to all other key assumptions for each major CGU or groups of CGUs; include the same disclosure for 2023, if relevant.]*

The impairment charge arose in \_\_\_\_\_ CGU. *[Tailor to explain circumstances of the impairment ]*

# Premises, Equipment and Intangible Assets

| *In thousands of EUR* | **Note** | **Premi-ses** | **Office and compu-ter**  **equip-ment** | **Con-struc-**  **tion in**  **pro-gress** | **Equip-ment leased to custo-mers** | **Total premi-ses and equip-ment** | **Com-puter**  **soft-ware**  **licences** | **Inter-nally deve-lopped soft-ware** | **Total** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |  |  |  |  |
| Cost [or valuation] at 1 January 2023 |  |  |  |  |  |  |  |  |  |
| Accumulated depreciation |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
| **Carrying amount at 1 January 2023** |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
| Acquisitions through business combinations | 52 |  |  |  |  |  |  |  |  |
| Additions |  |  |  |  |  |  |  |  |  |
| Capitalised internal [software] development costs |  |  |  |  |  |  |  |  |  |
| Transfers |  |  |  |  |  |  |  |  |  |
| Reclassification to non-current assets held for sale (or disposal groups) | 20 |  |  |  |  |  |  |  |  |
| Disposals |  |  |  |  |  |  |  |  |  |
| Depreciation charge | 35 |  |  |  |  |  |  |  |  |
| Impairment charge to profit or loss | 35 |  |  |  |  |  |  |  |  |
| Reversals of impairment through profit or loss |  |  |  |  |  |  |  |  |  |
| Revaluation | 31 |  |  |  |  |  |  |  |  |
| [Translation to presentation currency] |  |  |  |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
| **Carrying amount at 31 December 2023** |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
| Cost [or valuation] at 31 December 2023 |  |  |  |  |  |  |  |  |  |
| Accumulated depreciation |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
| **Carrying amount at 31 December 2023** |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
| Acquisitions through business combinations | 52 |  |  |  |  |  |  |  |  |
| Additions |  |  |  |  |  |  |  |  |  |
| Capitalised borrowing costs |  |  |  |  |  |  |  |  |  |
| Capitalised internal [software] development costs |  |  |  |  |  |  |  |  |  |
| Transfers |  |  |  |  |  |  |  |  |  |
| Transfer to non-current assets held for sale (or disposal groups) | 20 |  |  |  |  |  |  |  |  |
| Disposals |  |  |  |  |  |  |  |  |  |
| Depreciation charge | 35 |  |  |  |  |  |  |  |  |
| Impairment charge to profit or loss | 35 |  |  |  |  |  |  |  |  |
| Reversals of impairment through profit or loss |  |  |  |  |  |  |  |  |  |
| Revaluation | 31 |  |  |  |  |  |  |  |  |
| [Translation to presentation currency] |  |  |  |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
| **Carrying amount at 31 December 2024** |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
| Cost [or valuation] at 31 December 2024 |  |  |  |  |  |  |  |  |  |
| Accumulated depreciation |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |
| **Carrying amount at 31 December 2024** |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |

18 Premises, Equipment and Intangible Assets (Continued)

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

[Premises [and equipment] 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 and equipment included in equity is transferred directly to retained earnings [accumulated deficit] when the revaluation surplus is realised on the retirement or disposal of the asset, or as the asset is used by the Group; in the latter case, the amount of the surplus realised is the difference between depreciation based on the revalued carrying amount of the asset and depreciation based on the asset’s original cost.] *[Tailor to disclose specific details of the valuation method applied]*

If there is no market-based evidence of fair value, fair value is estimated using an income approach. [Management has updated the carrying value of land and buildings measured in accordance with the revaluation model at the end of the reporting period using market based evidence and is satisfied that sufficient market based evidence of fair value is available to support the updated fair values.] *[Or:* Management has updated the carrying value of land and buildings measured in accordance with the revaluation model at the end of the reporting period using [specify method].]

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.

Leasehold improvements are alterations made to rented properties by the Group to customise it to its particular business needs and preferences. The improvements that are specialised to the Group’s intended use of the property are treated as own assets for accounting purposes.

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.

18 Premises, Equipment and Intangible Assets (Continued)

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 or expenses).

***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 | [40 to 50] |
| Office and computer equipment | [5 to 10] |
| Right-of-use assets | [Please disclose the range for the remaining lease terms] |
| Leasehold improvements | [Please disclose the range, shorter of useful life and the term of the underlying lease] |
|  |  |

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 other than goodwill have definite useful life and primarily include capitalised computer software and *[specify the nature of the other intangibles]*. 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 exceeding costs is probable. Capitalised costs include staff costs of the software development team and an appropriate portion of relevant overheads. All other costs associated with computer software, e.g. its maintenance, are expensed when incurred.

Capitalised computer software is amortised on a straight line basis over expected useful lives of \_\_\_ to \_\_\_ years.

***[Capitalisation of borrowing costs.*** Borrowing costs that are directly attributable to the acquisition, construction or production of an asset that [is not carried at fair value and that] necessarily takes a substantial period of time to get ready for its intended use or sale (a qualifying asset), form part of the cost of that asset. Other borrowing costs are recognised as an expense using the effective interest method. The Group capitalises borrowing costs that would have been avoided if it had not made capital expenditure on qualifying assets. The commencement date for capitalisation is when (a) the Group incurs expenditures for the qualifying asset; (b) it incurs borrowing costs; and (c) it undertakes activities that are necessary to prepare the asset for its intended use or sale. Capitalisation ceases when all activities necessary to prepare the qualifying asset for its intended use or sale are complete.

18 Premises, Equipment and Intangible Assets (Continued)

Interest or other investment income is not deducted in arriving at the amount of borrowing costs available for capitalisation, except where the Group obtains specific borrowings for the purpose of acquiring a qualifying asset and has investment income on the temporary investment of funds obtained through such specific borrowings.]

The Group leased a [equipment] to its customers under short-term operating lease arrangements *[Tailor to disclose narrative description of lessor’s leasing activities. Refer to IFRS 16.92]*

*[Disclose how residual value risk in the assets leased to other parties is managed, including strategy and risk mitigating arrangements, such as variable lease payments, residual value guarantees etc.]*

Where the Group is the lessor, the future minimum lease payments receivable under operating leases of equipment are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **31 December 2024** | **31 December 2023** |
|  |  |  |
| 1 year |  |  |
| 2 year |  |  |
| 3 year |  |  |
| 4 year |  |  |
| 5 year |  |  |
| Later than 5 years |  |  |
|  |  |  |
|  |  |  |
| **Total undiscontinued future operating lease payments receivable at 31 December** |  |  |
|  |  |  |

Rental income from equipment was EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand), including EUR\_\_\_ thousand of income relating to variable lease payments that do not depend on an index or a rate.

[The lease agreements do not impose any covenants other than the security interests in the leased assets that are held by the Group. Leased assets may not be used by a lessee as collateral for borrowings.]

Total contingent payments receivable recognised as income in 2023 under the Group’s non-cancellable operating leases of equipment were EUR \_\_\_\_\_ thousand.

The Group capitalised borrowing costs of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) relating to the construction of own premises. The capitalisation rate was \_\_ % p.a.

Construction in progress consists [mainly] of construction and refurbishment of branch premises [and equipment]. Upon completion, assets are transferred to premises and equipment. [Additions to construction in progress include capitalised borrowing costs of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). The capitalisation rate was \_\_\_\_\_ % (2023: \_\_\_\_\_ %).]

18 Premises, Equipment and Intangible Assets (Continued)

Premises have been revalued at fair value at \_\_\_\_\_\_\_\_\_\_ 2024. The valuation was carried out by an independent firm of valuers, \_\_\_\_\_\_\_\_\_\_, who hold a recognised and relevant professional qualification and who have recent experience in the valuation of assets in similar locations and in a similar category. The basis used for the appraisal was [replacement cost, market value, discounted cash flow, etc.] Fair values were estimated using appropriate valuation techniques and using the following assumptions: *[Tailor to state here assumptions]*.

At 31 December 2024, the carrying amount of premises would have been EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) had the assets been carried at cost less depreciation. The amount reconciles to the carrying value of the premises as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **31 December**  **2024** | **31 December**  **2023** |
|  |  |  |
| Premises at revalued amount in the statement of financial position |  |  |
| Revaluation reserve presented in equity, net of tax |  |  |
| [Difference between accumulated depreciation based on cost and based on revalued amount not yet transferred to retained earnings] |  |  |
| Deferred tax on revaluation (Note 36) |  |  |
|  |  |  |
|  |  |  |
| **Premises at cost less accumulated depreciation** |  |  |
|  |  |  |

At 31 December 2024, premises [and equipment] carried at EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) have been pledged to third parties as collateral with respect to [other borrowed funds]. Refer to Note [24]. *[Tailor to disclose amount of intangible assets whose title is restricted, if any.]*

*[Provide the description, carrying amount and remaining amortisation period of any individual intangible asset that is material to the financial statements as a whole.] [Impairment losses were recognised as a result of the credit loss test described in Note* [*17*](#_heading=h.3as4poj)*.]*

# Right-of-use Assets and Lease Liabilities

The Group leases various [offices, equipment, vehicles and land]. Rental contracts are typically made for fixed periods of [6 months to 8 years, but may have extension options as described below].

All 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 EUR* | **Note** | **Land** | **Buildings** | **Equipment** | **Vehicles** | **Other** | **Total** |
|  |  |  |  |  |  |  |  |
| **Carrying amount at 1 January 2023** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Additions |  |  |  |  |  |  |  |
| Disposals |  |  |  |  |  |  |  |
| Depreciation charge |  |  |  |  |  |  |  |
| Impairment charge |  |  |  |  |  |  |  |
| [Effect of translation to presentation currency] |  |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **Carrying amount at 31 December 2023** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Additions |  |  |  |  |  |  |  |
| Disposals |  |  |  |  |  |  |  |
| Depreciation charge |  |  |  |  |  |  |  |
| Impairment charge |  |  |  |  |  |  |  |
| [Effect of translation to presentation currency] |  |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **Carrying amount at 31 December 2024** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

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.

19 Right-of-use Assets and Lease Liabilities (Continued)

[Payments under long-term leases of land based on cadastral value of land are treated as variable lease payments that are not based on an index or a rate.]

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 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).

[Potential future cash outflows of EUR \_\_\_\_ thousand have not been included in the lease liability because it is not reasonably certain that the leases will 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. [During the current financial year, the financial effect of revising lease terms to reflect the effect of exercising extension and termination options was an increase in recognised lease liabilities and right-of-use assets of EUR \_\_\_\_\_\_ thousand].

Interest expense on lease liabilities was EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_ thousand).

Some land leases contain variable payment terms that are linked to [cadastral values of the land]. Variable payment terms are used for a variety of reasons, including minimising the fixed costs base. Variable lease payments that depend on [cadastral values] are recognised in profit or loss in the period in which the condition that triggers those payments occurs. A 10% increase in [cadastral values] across all properties in the group with such variable lease contracts would increase total lease payments by approximately EUR \_\_\_ thousand (2023: EUR \_\_\_thousand).

Expense relating to variable lease payments not included in lease liabilities included [in general and administrative expenses] of 2024 was EUR \_\_\_\_\_ thousand (2023: EUR\_\_\_\_thousand). As at 31 December 2024, future cash outflows of EUR \_\_\_ thousand (2023: EUR \_\_\_\_thousand) (undiscounted) to which the Group is potentially exposed to during the lease term have not been included in the lease liability because they include variable lease payments that are linked to [sales, or other variable].

Expenses relating to short-term leases (included in [general and administrative expenses]) and to leases of low-value assets that are not shown as short-term leases are included in [general and administrative expenses]:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Expense relating to short-term leases |  |  |
| Expense relating to leases of low-value assets that are not shown above as short-term leases |  |  |
|  |  |  |

Total cash outflow for leases in 2024 was EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_thousand).

[The lease agreements do not impose any covenants other than the security interests in the leased assets that are held by the lessor. Leased assets may not be used as collateral for borrowings.] *[Tailor to disclose restrictions or covenants imposed by lease as required by IFRS 16.59(c).]*

19 Right-of-use Assets and Lease Liabilities (Continued)

[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.]

[As at 31 December 2024, potential future cash outflows of EUR \_\_\_ thousand (2023: EUR\_\_\_\_thousand) (undiscounted) have not been included in the lease liability because it is not reasonably certain that the leases will be extended (or not terminated). 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.]

[In 2024, the Group performed a revision of its operational model and business plan. The Group reviewed the list of rented premises and concluded that some of the lease extension options are no longer reasonably certain to beexercised because the Group plans to reduce the number of its offices and implement remote working opportunities for employees. The reassessment resulted in reducing the lease liabilities by EUR \_\_\_\_\_thousand with a corresponding adjustment to the right-of-use asset.]

[During the current reporting year, the financial effect of revising lease term to reflect the effect of exercising extension and termination options was an increase in recognised lease liabilities and right-of-use assets of EUR\_\_\_ thousand.]

[To optimise lease costs during the contract period, the Group sometimes provides residual value guarantees in relation to equipment leases. The Group initially estimates and recognises amounts expected to be payable under residual value guarantees as part of the lease liability. Typically the expected residual value at lease commencement is equal to or higher than the guaranteed amount, and so the Group does not expect to pay anything under the guarantees.

At the end of each reporting period, the expected residual values are reviewed to reflect actual residual values achieved on comparable assets and expectations about future prices. As at 31 December 2024, EUR \_\_\_\_ thousand (2023: EUR\_\_\_\_thousand) is expected to be payable and is included in calculating the lease liabilities while EUR \_\_\_\_ thousand (2023: EUR\_\_\_\_thousand) (undiscounted) is not expected to be payable and has hence been excluded from the lease liabilities.]

# Non-Current Assets Classified as Held for Sale (or Disposal Groups)

Major classes of non-current assets classified as held for sale (or disposal groups) are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| *Assets of a disposal group held for sale:* |  |  |
| Cash and cash equivalents |  |  |
| Investments in debt and equity securities |  |  |
| Due from other banks |  |  |
| Loans and advances to customers |  |  |
| Investment properties |  |  |
| Investment in associates |  |  |
| Current income tax prepayment |  |  |
| Deferred income tax asset |  |  |
| Goodwill |  |  |
| Intangible assets |  |  |
| Premises and equipment |  |  |
|  |  |  |
| *Non-current assets held for sale:* |  |  |
| Premises and equipment |  |  |
|  |  |  |
|  |  |  |
| **Total Non-current assets held for sale (or disposal groups)** |  |  |
|  |  |  |

20 Non-Current Assets Classified as Held for Sale (or Disposal Groups) (Continued)

Major classes of liabilities directly associated with disposal groups held for sale are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Due to other banks |  |  |
| Customer accounts |  |  |
| Debt securities in issue [Promissory notes issued] |  |  |
| Other borrowed funds |  |  |
| Current income tax liability |  |  |
| Deferred income tax liability |  |  |
| Provisions for liabilities and charges |  |  |
| Other liabilities |  |  |
|  |  |  |
|  |  |  |
| **Total liabilities directly associated with disposal groups 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.

A disposal group is a group of assets (current or non-current) to be disposed of, by sale or otherwise, together as a group in a single transaction, and liabilities directly associated with those assets that will be transferred in the transaction. Goodwill is included if the disposal group includes an operation within a cash-generating unit to which goodwill has been allocated on acquisition. Non-current assets are assets that include amounts expected to be recovered or collected more than twelve months after the end of the reporting period. If reclassification is required, both the current and non-current portions of an asset are reclassified.

Held for sale disposal groups as a whole are measured at the lower of their carrying amount and fair value less costs to sell. Held for sale premises and equipment [, investment properties and intangible assets] are not depreciated or amortised. Reclassified non-current financial instruments[,] [and] deferred taxes[,] [and investment properties held at fair value] are not subject to write down to the lower of their carrying amount and fair value less costs to sell.]

***Discontinued operations.*** A discontinued operation is a component of the Group that either has been disposed of, or that is classified as held for sale, and: (a) represents a separate major line of business or geographical area of operations; (b) is part of a single co-ordinated plan to dispose of a separate major line of business or geographical area of operations; or (c) is a subsidiary acquired exclusively with a view to resale. Earnings and cash flows of discontinued operations, if any, are disclosed separately from continuing operations with comparatives being re-presented.

*[Tailor to specify accounting policy if the Group holds an asset (or disposal group) previously classified as held for sale, but the held for sale criteria are no longer met – see IFRS 5.26.]*

Liabilities directly associated with disposal groups that will be transferred in the disposal transaction are reclassified and presented separately in the statement of financial position.

20 Non-Current Assets Classified as Held for Sale (or Disposal Groups) (Continued)

Management approved a plan to sell \_\_\_\_\_ assets on \_\_\_\_\_ due to \_\_\_\_\_. The Group is actively marketing these assets and expects the sale to complete by \_\_\_\_\_2024. *[Tailor to describe facts and circumstances, expected manner and timing of that disposal.]* [Refer to Note 35 for loss on write-down to fair value less costs to sell of Non-current assets held for sale (or disposal groups).]

*[If applicable, disclose, in the period of the decision to change the plan to sell the non-current asset (or disposal group), a description of the facts and circumstances leading to the decision and the effect of the decision on the results of operations for the period and any prior periods presented.]*

*[If material, provide also IFRS 7 and IFRS 13 disclosures about measurement of financial assets and liabilities that are not otherwise included in Note 41, Financial Risk Management or Note 49, Fair Value of Financial Instruments. This includes for example analysis of credit quality and ECL of financial assets and information about fair value measurement. Refer to IFRS 5.5B.]*

On \_\_\_\_\_ 2024, the Group disposed of \_\_\_\_\_% of the share capital of \_\_\_\_\_. The subsidiary was previously classified as a disposal group and its assets and liabilities were accordingly reclassified in the statement of financial position. The details of the disposed assets and liabilities and disposal consideration are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **Note** | **[Date of disposal]** |
|  |  |  |
| Goodwill | 17 |  |
| Cash and cash equivalents |  |  |
| Loans and advances to customers |  |  |
| Debt securities at [FVOCI] |  |  |
| Other assets |  |  |
| Customer accounts |  |  |
| Other liabilities |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| **Net assets of subsidiary, including attributed goodwill** |  |  |
| Less: non-controlling interest |  |  |
|  |  |  |
|  |  |  |
| **Carrying amount of disposed net assets** |  |  |
|  |  |  |
|  |  |  |
| **Total disposal consideration** |  |  |
| Less: fair value of receivable arising on disposal | 15 |  |
| Less: cash and cash equivalents in disposed subsidiary |  |  |
|  |  |  |
|  |  |  |
| **Cash inflow on disposal** |  |  |
|  |  |  |

20 Non-Current Assets Classified as Held for Sale (or Disposal Groups) (Continued)

The gain [loss] on disposal of the subsidiary comprises:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **Note** | **Gain on disposal of subsidiary** |
|  |  |  |
| Consideration for disposal of the subsidiary |  |  |
| Carrying amount of disposed net assets, net of non-controlling interest |  |  |
| Cumulative currency translation reserve on foreign operation recycled from other comprehensive income to profit or loss |  |  |
| Revaluation reserve for FVOCI debt financial assets recycled from other comprehensive income to profit or loss upon disposal |  |  |
|  |  |  |
|  |  |  |
| **Gain [loss]** **on disposal of subsidiary** |  |  |
|  |  |  |

The portion of the gain or loss on disposal of the subsidiary attributable to measuring the investment retained in the former subsidiary at fair value at the date when control was lost amounts to EUR \_\_\_\_ thousand.

# Due to Other Banks

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Correspondent accounts and overnight placements of other banks |  |  |
| Short-term placements of other banks |  |  |
| Sale and repurchase agreements with other banks |  |  |
| Liability to return collateral sold or repledged |  |  |
| Overdue term placements of other banks |  |  |
|  |  |  |
|  |  |  |
| **Total due to other banks** |  |  |
|  |  |  |

[Amounts due to other banks are recorded when money or other assets are advanced to the Group by counterparty banks. 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.]

During 2024, a gain [loss] on initial recognition of balances due to other banks at rates below [above] market in the amount of EUR\_\_\_ thousand (2023: EUR \_\_\_ thousand) has been recorded in profit or loss for the year. *[Tailor to explain commercial reason for the gain/loss and consider whether the gain/loss should be recognised as a capital transaction in equity if it arises from transactions with parties under common control.]*

At 31 December 2024, included in amounts due to other banks are liabilities of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) from sale and repurchase agreements. Refer to Note 12.

The Group accepted [securities] as collateral that it was allowed to sell or repledge (Note 11). The Group sold [or repledged] such collateral and recognised the cash proceeds as a liability carried at fair value of EUR \_\_\_\_\_ thousand at the end of the reporting period (2023: EUR \_\_\_\_\_ thousand).

**21 Due to Other Banks (Continued)**

*[Tailor to disclose the aggregate amount of secured liabilities and the nature and carrying amount of the assets pledged as security. If this is very detailed, consider a separate note.]*

Refer to Note 49 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 41. Information on related party balances is disclosed in Note 51.

# Customer Accounts

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| **State and public organisations** |  |  |
| - Current/settlement accounts |  |  |
| - Term deposits |  |  |
|  |  |  |
| **Other legal entities** |  |  |
| - Current/settlement accounts |  |  |
| - Term deposits |  |  |
|  |  |  |
| **Individuals** |  |  |
| - Current/demand accounts |  |  |
| - Term deposits |  |  |
|  |  |  |
|  |  |  |
| **Total customer accounts** |  |  |
|  |  |  |

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

State and public organisations exclude government owned profit-orientated businesses. During 2024, a gain [loss] on initial recognition of term deposits at rates below [above] market in the amount of EUR \_\_\_ thousand (2023: EUR \_\_\_ thousand) has been recorded in profit or loss for the year [statement of changes in equity because it effectively represents a capital contribution from [distribution to] the Group’s owners].

Economic sector concentrations within customer accounts are as follows:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *In thousands of EUR* | **2024** | | **2023** | |
| **Amount** | **%** | **Amount** | **%** |
|  |  |  |  |  |
| State and public organisations |  |  |  |  |
| Cities and municipalities |  |  |  |  |
| Manufacturing |  |  |  |  |
| Real estate |  |  |  |  |
| Trade |  |  |  |  |
| Agriculture |  |  |  |  |
| Individuals |  |  |  |  |
| Other |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Total customer accounts** |  |  |  |  |
|  |  |  |  |  |

22 Customer Accounts (Continued)

At 31 December 2024, the Group had \_\_\_\_\_ customers (2023: \_\_\_\_\_ customers) with balances above EUR \_\_\_\_\_\_ thousand. The aggregate balance of these customers was EUR \_\_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_\_ thousand) or \_\_\_\_\_% (2023: \_\_\_\_\_%) of total customer accounts.

At 31 December 2024, included in customer accounts are deposits of EUR \_\_\_\_ thousand (2023: EUR \_\_ thousand) held as collateral for irrevocable commitments under import letters of credit. Refer to Note 43.

*[Tailor to disclose the aggregate amount of secured liabilities and the nature and carrying amount of the assets pledged as security. If this is very detailed, consider a separate note.]*

Refer to Note 49 for the disclosure of the fair value of each class of customer accounts. Interest rate analysis of customer accounts is disclosed in Note 41. Information on related party balances is disclosed in Note 51.

# Debt Securities in Issue [Promissory Notes Issued]

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Promissory notes |  |  |
| Eurobonds |  |  |
| Bonds issued on domestic market |  |  |
| Deposit certificates |  |  |
| Debentures |  |  |
|  |  |  |
|  |  |  |
| **Total debt securities in issue [Promissory notes issued]** |  |  |
|  |  |  |

Debt securities in issue include promissory notes, bonds, certificates of deposit and debentures issued by the Group. Debt securities are stated at AC. [If the Group purchases its own debt securities in issue, they are 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 arising from [early] retirement of debt.]

[Upon the issue of convertible bonds, the liability component is determined by measuring the fair value of an equivalent non-convertible bond. The equity component is assigned the residual amount after deducting from the fair value of the convertible bonds as a whole the amount separately determined for the liability component. The obligation to make future payments of principal and interest to bondholders is carried at AC until extinguished on conversion or maturity of the bonds. The conversion feature is accounted for as a financial derivative where the conversion right held by the lender is not to convert a fixed amount of the bond expressed in the entity’s functional currency to fixed number of equity instruments.]

*[Tailor to disclose the aggregate amount of secured liabilities and the nature and carrying amount of the assets pledged as security. If this is very detailed, consider a separate note.]* At 31 December 2024, the Group has debt securities in issue of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) in US Dollars denominated [Eurobonds]. These bonds mature on \_\_\_\_\_, have a coupon rate of \_\_\_\_\_% (2023: \_\_\_\_\_%) and a yield to maturity of \_\_\_\_\_% (2023: \_\_\_\_\_%) based on market quotes at the reporting date [and an effective interest rate of \_\_\_\_\_% (2023: \_\_\_\_\_%) based on their issue price, net of transaction costs, at the date of origination.]

23 Debt Securities in Issue [Promissory Notes Issued] (Continued)

Refer to Note 49 for the disclosure of the fair value of each class of debt securities in issue. Interest rate analyses of debt securities in issue [promissory notes issued] are disclosed in Note 41. Information on debt securities in issue [promissory notes issued] held by related parties is disclosed in Note 51.

At 31 December 2024, the Group had debt securities in issue held by \_\_\_\_\_ counterparties (2023: \_\_\_\_\_ counterparties) with balances above EUR \_\_\_\_\_\_ thousand. The aggregate amount of these balances was EUR \_\_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_\_ thousand) or \_\_\_\_\_% (2023: \_\_\_\_\_%) of total debt securities in issue. *[If in default, tailor to describe the situation, penalties, carrying amount of the securities, whether the breach was remedied or the terms of the loans payable renegotiated before the date the financial statements were authorised for issue, etc.*

# Other Borrowed Funds

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| *Other borrowed funds at AC* |  |  |
|  |  |  |
| Syndicated loan maturing on \_\_\_\_ |  |  |
| Term borrowings from companies/government agencies |  |  |
| Borrowings through securitisation transaction (Note 47) |  |  |
|  |  |  |
|  |  |  |
| **Total other borrowed funds at AC** |  |  |
|  |  |  |
|  |  |  |
| *Other borrowed funds at FVTPL* |  |  |
|  |  |  |
| Liability to return collateral sold or repledged |  |  |
| Other structured funding designated at FVTPL at initial recognition |  |  |
|  |  |  |
|  |  |  |
| **Total other borrowed funds at FVTPL** |  |  |
|  |  |  |
|  |  |  |
| **Total other borrowed funds** |  |  |
|  |  |  |

Other structured funding has been designated at FVTPL as the instrument contains embedded derivatives arising from the early repayment option stipulated in the contract. *[Tailor to describe the embedded derivative substance]*. Gains and losses on such liabilities are presented in profit or loss except for the amount of change in the fair value that is attributable to changes in the credit risk of that liability (determined as the amount that is not attributable to changes in market conditions that give rise to market risk), which is recorded in OCI and is not subsequently reclassified to profit or loss. This is unless such a presentation would create, or enlarge, an accounting mismatch, in which case the gains and losses attributable to changes in credit risk of the liability are also presented in profit or loss.

24 Other Borrowed Funds (Continued)

The amount of change in the fair value of financial liabilities designated at FVTPL that is attributable to changes in own credit risk is as follows:

|  |  |  |
| --- | --- | --- |
|  | **Other structured funding** | |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Carrying amount at 1 January |  |  |
| Change in the fair value attributable to changes in own credit risk recognised in OCI during the period |  |  |
| Other changes in fair value |  |  |
|  |  |  |
|  |  |  |
| Carrying amount at 31 December |  |  |
|  |  |  |
|  |  |  |
| Accumulated amount of the change in fair value attributable to changes in own credit risk at 31 December |  |  |
|  |  |  |
|  |  |  |
| Difference between the contractual amount due at maturity and carrying amount at 31 December |  |  |
|  |  |  |

[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.]

The change in fair value attributable to changes in credit risk on financial liabilities is calculated [using the credit spread observed for recent issuances of similar debt, adjusted for subsequent changes in the credit spread observed on credit default swaps on the issuing Bank's senior debt].

The Group accepted [securities] as collateral that it was allowed to sell or repledge (Notes 8 and 11). The Group sold [or repledged] such collateral and recognised the cash proceeds as a liability carried at a fair value of EUR \_\_\_\_\_ thousand at the end of the reporting period (2023: EUR \_\_\_\_\_ thousand). *[Tailor to disclose the aggregate amount of secured liabilities and the nature and carrying amount of the assets pledged as security. If this is very detailed, consider a separate note.]*

*[If in default, describe the situation, penalties, carrying amount of the loan, whether the breach was remedied or the terms of the loans payable renegotiated before the date the financial statements were authorised for issue, etc.]*

Refer to Note 49 for disclosure of the fair value of each class of other borrowed funds. Interest rate analysis of other borrowed funds is disclosed in Note 41. Information on related party balances is disclosed in Note 51.

# Provisions for Liabilities and Charges

Movements in provisions for liabilities and charges are as follows:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **Tax risks** | **Other** | **Total** |
|  |  |  |  |  |
| **Carrying amount at 1 January 2023** |  |  |  |  |
|  |  |  |  |  |
| Additions charged to profit or loss | 35 |  |  |  |
| Additions through business combinations | 52 |  |  |  |
| Utilisation of provision |  |  |  |  |
| Unwinding of the present value discount and effect of changes in discount rates |  |  |  |  |
| Unused amounts reversed | 35 |  |  |  |
| [Effect of translation to presentation currency] |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Carrying amount at 31 December 2024** |  |  |  |  |
|  |  |  |  |  |

***[***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.] *[Include details of specific accounting policies for significant types of provisions, if relevant.]*

[Levies and charges, such as taxes other than income tax or regulatory fees based on information related to a period before the obligation to pay arises, are recognised as liabilities when the obligating event that gives rise to pay a levy occurs, as identified by the legislation that triggers the obligation to pay the levy. If a levy is paid before the obligating event, it is recognised as a prepayment.]

***Provision for uncertain*** *[value added]* ***tax positions and related penalties and interest.*** The Group has recorded provisions of EUR \_\_\_\_ thousand in respect of uncertain [value added] taxes and the related penalties and interest. [Insert explanation of the specific tax matters; separate disclosures for taxes or situations that are different in nature]. The balance at 31 December 2024 is expected to be either fully utilised or released when the inspection rights of the tax authorities with respect to the relevant tax returns expire, as follows: EUR \_\_\_\_ thousand by the end of 2025, EUR \_\_\_\_ thousand by the end of 2024 and EUR \_\_\_\_ thousand by the end of 2024. *[Disclose movements in provisions by class.]* *[Provide additional disclosure as to the nature of the exposure as appropriate]*

***Other provisions:*** Other provisions include a provision for certain legal claims brought against the Group by \_\_\_\_\_ relating to \_\_\_\_\_. The balance at 31 December 2024 is expected to be utilised by the end of 20\_\_. In management’s opinion, after taking appropriate legal advice, the outcome of these legal claims will not give rise to any significant loss beyond the accrued amounts. Refer to Note 43.

Information on related party balances is disclosed in Note 51.

# Other Financial Liabilities

Other financial liabilities comprise the following:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **2024** | **2023** |
|  |  |  |  |
| *Other financial liabilities at AC* |  |  |  |
|  |  |  |  |
| Trade payables |  |  |  |
| Dividends payable | 37 |  |  |
| Debit or credit card payables |  |  |  |
| Settlements on conversion operations |  |  |  |
| Financial guarantees |  |  |  |
| Loan commitments |  |  |  |
| Performance guarantees |  |  |  |
| Other accrued liabilities |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total other financial liabilities at AC** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| *Other financial liabilities mandatorily measured at FVTPL* |  |  |  |
|  |  |  |  |
| Foreign exchange forward contracts | 48 |  |  |
| Precious metal forwards | 48 |  |  |
| Other derivative financial instruments | 48 |  |  |
| Other |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total other financial liabilities at FVTPL** |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total other financial liabilities** |  |  |  |
|  |  |  |  |

***[Trade payables.*** Trade payables are accrued when the counterparty has performed its obligations under the contract and are carried at AC.] *[Include details of specific accounting policies for significant other payables, if relevant.]*

Refer to Note 43 for analysis of exposure from financial guarantees and loan commitments by credit risk grades.

26 Other Financial Liabilities (Continued)

Movements in the provision for financial guarantees were as follows.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **Total provision** | **Gross guaranteed amount** |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Provision for financial guarantees at 31 December 2023** |  |  |  |  |  |
|  |  |  |  |  |  |
| *Movements with impact on provision for credit related commitments charge for the period:* |  |  |  |  |  |
| Transfers: |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |
| - 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) |  |  |  |  |  |
| Issued guarantees (fees charged) |  |  |  |  |  |
| Amortisation of deferred fee to income |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |
| Changes to model assumptions |  |  |  |  |  |
| Unwinding of discounting |  |  |  |  |  |
| Other movements |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total charge to profit or loss for the year** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| *Movements without impact on provision for credit related commitments charge for the period:* |  |  |  |  |  |
| Write-offs |  |  |  |  |  |
| FX movements |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |
| Unwinding of discount (for Stage 3) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Provision for financial guarantees at  31 December 2024** |  |  |  |  |  |
|  |  |  |  |  |  |

26 Other Financial Liabilities (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **Total provision** | **Gross guaranteed amount** |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Provision for financial guarantees at  1 January 2023** |  |  |  |  |  |
|  |  |  |  |  |  |
| *Movements with impact on provision for credit related commitments charge for the period:* |  |  |  |  |  |
| Transfers: |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |
| - 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) |  |  |  |  |  |
| Issued guarantees (fees charged) |  |  |  |  |  |
| Amortisation of deferred fee to income |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |
| Changes to model assumptions |  |  |  |  |  |
| Unwinding of discounting |  |  |  |  |  |
| Other movements |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total charge to profit or loss for the year** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| *Movements without impact on provision for credit related commitments charge for the period:* |  |  |  |  |  |
| Write-offs |  |  |  |  |  |
| FX movements |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |
| Unwinding of discount (for Stage 3) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Provision for financial guarantees at  31 December 2023** |  |  |  |  |  |
|  |  |  |  |  |  |

26 Other Financial Liabilities (Continued)

Movements in the provision for loan commitments were as follows.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **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 2023** |  |  |  |  |  |
|  |  |  |  |  |  |
| *Movements with impact on provision for credit related commitments charge for the period:* |  |  |  |  |  |
| Transfers: |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |
| - 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) |  |  |  |  |  |
| Issued loan commitments – fees charged |  |  |  |  |  |
| Issued loan commitments – 12-months ECL |  |  |  |  |  |
| Amortisation of deferred fee to income |  |  |  |  |  |
| Transfer to ECL on loans upon loans drawdown |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |
| Changes to model assumptions |  |  |  |  |  |
| Unwinding of discounting |  |  |  |  |  |
| Other movements |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total charge to profit or loss for the year** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| *Movements without impact on provision for credit related commitments charge for the period:* |  |  |  |  |  |
| Write-offs |  |  |  |  |  |
| FX movements |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |
| Unwinding of discounting (for Stage 3) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Provision for loan commitments at  31 December 2024** |  |  |  |  |  |
|  |  |  |  |  |  |

26 Other Financial Liabilities (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **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  1 January 2023** |  |  |  |  |  |
|  |  |  |  |  |  |
| *Movements with impact on provision for credit related commitments charge for the period:* |  |  |  |  |  |
| Transfers: |  |  |  |  |  |
| - to lifetime (from Stage 1 to Stage 2) |  |  |  |  |  |
| - 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) |  |  |  |  |  |
| Issued loan commitments – fees charged |  |  |  |  |  |
| Issued loan commitments – 12-months ECL |  |  |  |  |  |
| Amortisation of deferred fee to income |  |  |  |  |  |
| Transfer to ECL on loans upon loans drawdown |  |  |  |  |  |
| Derecognised during the period |  |  |  |  |  |
| Changes to model assumptions |  |  |  |  |  |
| Unwinding of discounting |  |  |  |  |  |
| Other movements |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total charge to profit or loss for the year** |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| *Movements without impact on provision for credit related commitments charge for the period:* |  |  |  |  |  |
| Write-offs |  |  |  |  |  |
| FX movements |  |  |  |  |  |
| Modification of contractual cash flows |  |  |  |  |  |
| Unwinding of discounting (for Stage 3) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Provision for loan commitments at  31 December 2023** |  |  |  |  |  |
|  |  |  |  |  |  |

Refer to Note 49 for disclosure of the fair value of each class of other financial liabilities. *[Adjust table above to show POCI items, eg in case such commitments and guarantees were acquired in a business combination.]*

# Other Liabilities

Other liabilities comprise the following:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **2024** | **2023** |
|  |  |  |  |
| Taxes payable other than on income |  |  |  |
| Accrued employee benefit costs |  |  |  |
| Deferred consideration for acquisitions | 52 |  |  |
| Contract liability – deferred income | 33 |  |  |
| Other |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total other liabilities** |  |  |  |
|  |  |  |  |

# Subordinated Debt

Subordinated debt of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) carries a [fixed] [variable] interest rate of \_\_\_ % p.a. and matures on \_\_\_\_\_\_\_. The debt ranks after all other creditors in the case of liquidation. Subordinated debt is carried at AC.

Refer to Note 49 for the disclosure of the fair value of subordinated debt. Interest rate analysis of subordinated debt is disclosed in Note 41. Information on related party balances is disclosed in Note 51.

# Share Capital

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR except for number of shares* | **Number of**  **outstanding**  **shares [in**  **thousands]** | **Ordinary shares** | **Share premium** | **Prefe-rence shares** | **Treasury shares** | **Total** |
|  |  |  |  |  |  |  |
| **At 1 January 2023** |  |  |  |  |  |  |
| New shares or bonds issued |  |  |  |  |  |  |
| Treasury shares purchased |  |  |  |  |  |  |
| Treasury shares sold |  |  |  |  |  |  |
| [Translation to presentation currency] |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |
| New shares or bonds issued |  |  |  |  |  |  |
| Treasury shares purchased |  |  |  |  |  |  |
| Treasury shares sold |  |  |  |  |  |  |
| [Translation to presentation currency] |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **At 31 December 2024** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

29 Share Capital (Continued)

[Ordinary shares and non-redeemable preference shares with discretionary dividends are both 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.

Preference shares which carry a mandatory coupon or are redeemable on a specific date or at the option of the shareholder are classified as financial liabilities and are presented in other borrowed funds. The dividends on these preference shares are recognised as interest expense on an AC basis, using the effective interest method.]

***Treasury shares.*** Where the Bank or its subsidiaries purchase the Bank’s equity instruments, the consideration paid, including any directly attributable incremental external costs, net of income taxes, is deducted from equity attributable to the owners of the Bank until the equity instruments are reissued, disposed of or cancelled. Where such shares are subsequently disposed of or reissued, any consideration received is included in equity.

***Dividends.*** Dividends are recorded in equity in the period in which they are declared. Any dividends declared after the end of the reporting period and before the [consolidated] financial statements are authorised for issue, are disclosed in the subsequent events note. The statutory accounting reports of the Bank are the basis for profit distribution and other appropriations. [Country] legislation identifies the basis of distribution as the current year net profit.

[Ordinary shares issued to a lender (who is not an owner of the entity) in order to settle a financial liability are recorded at the fair value of the shares issued when the settlement in shares was not part of the original terms and conditions of the borrowing. A gain or loss on the negotiated early extinguishment of the debt is recognised in profit or loss.]

The nominal registered amount of the Bank’s issued share capital is EUR \_\_\_\_\_thousand (2023: EUR \_\_\_\_\_thousand.

The total authorised number of ordinary shares is \_\_\_\_ thousand shares (2023: \_\_\_\_ thousand shares), with a par value of EUR \_\_\_\_ per share (2023: EUR \_\_\_ per share). All issued ordinary shares are fully paid. [The number of ordinary shares issued but not fully paid in 2024 was \_\_\_\_\_ (2023: \_\_\_\_\_).] Each ordinary share carries one vote. Each ordinary share carries equal right to participate in profits and obtain dividends, as declared from time to time by the general shareholders meeting, and to participate in net assets upon the entity’s liquidation.

The total authorised number of preference shares is \_\_\_\_ thousand shares (2023: \_\_\_\_ thousand shares), with a par value of EUR \_\_\_\_ per share (2023: EUR \_\_\_ per share). All issued preference shares are fully paid. [The number of preference shares issued but not fully paid in 2024 was \_\_\_\_\_ (2023: \_\_\_\_\_).]

The preference shares are not redeemable and rank ahead of the ordinary shares in the event of the Bank’s liquidation. [The preference shares give the holders the right to participate in general shareholders’ meetings without voting rights, except in instances where decisions are made in relation to reorganisation and liquidation of the Bank, and where changes and amendments to the Bank’s charter which restrict the rights of preference shareholders are proposed.] Preference share dividends are set at \_\_\_\_ % p.a. (2023: \_\_\_\_ % p.a.) and rank above ordinary dividends. If preference dividends are not declared by ordinary shareholders, the preference shareholders obtain the right to vote as ordinary shareholders until such time that the dividend is paid.

*[Describe share issue(s) shares pledged and written share options. Provide a description of all non-cash movements, e.g. capitalisation of reserves.]*

At 31 December 2024, treasury shares include \_\_\_\_\_ [ordinary] shares of the Bank (2023: \_\_\_\_\_ [ordinary] shares) owned by wholly owned subsidiaries of the Group. These ordinary shares carry voting rights in the same proportion as other ordinary shares. Voting rights of ordinary shares of the Bank held by the entities within the Group are effectively controlled by the management of the Group.

Share premium represents the excess of contributions received over the nominal value of shares issued.

29 Share Capital (Continued)

In accordance with the [Country] legislation, the Bank distributes profits as dividends or transfers them to reserves on the basis of financial statements prepared in accordance with [Country] Accounting Rules. The Bank’s reserves under [Country] Accounting Rules at 31 December 2024 amount to EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand).

# Perpetual Bonds

***[Perpetual bonds.*** The Group classifies perpetual bonds as equity or financial liability based on their contractual substance. Issued bonds, which do not have a specific maturity date and where any repayments (including interest) are at the Group’s discretion, are classified as equity instruments. Interest payments on such bonds are treated as dividend payments and are recognised as distributions from equity when paid. The tax benefits of distributions are recognised in profit or loss because they are linked more directly to past transactions or events that generated distributable profits than to the distributions to owners.]

The Group issued \_\_\_ (2023: \_\_\_\_) perpetual bonds with a total nominal value of EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) carrying discretionary interest of \_\_\_ % p.a. (2023: \_\_\_\_\_ % p.a.). The bonds are cancellable upon a significant reduction in the entity’s capital ratio. The bonds were classified as equity instruments.

# Other Comprehensive Income Recognised in Each Component of Equity

Analysis of other comprehensive income by item for each component of equity is as follows for the year ended 31 December 2024:

|  |  | **Attributable to owners of the Bank** | | | | | | | | | | **Non-controll-ing**  **Interest** | **Total**  **equity** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **Share**  **сapi-tal** | | **Share pre-mium** | **Perpe-tual bonds** | **Revalu-ation reserve for invest-ment secure-ties at FVOCI** | **Revalu-ation of financial liabilities attribu-table to own credit risk** | **Reva-luation reserve for pre-mises** | **Cur-rency trans-lation reserve** | **Re-tained**  **ear-nings [Accu-mulated deficit]** | **Total** |
|  |  |  |  | |  |  |  |  |  |  |  |  |  |
| **Year ended  31 December 2024** |  |  |  | |  |  |  |  |  |  |  |  |  |
|  |  |  |  | |  |  |  |  |  |  |  |  |  |
| Securities at FVOCI: |  |  |  | |  |  |  |  |  |  |  |  |  |
| - Gains less losses arising during the year |  |  |  | |  |  |  |  |  |  |  |  |  |
| - Gains less losses reclassified to profit or loss on disposal |  |  |  | |  |  |  |  |  |  |  |  |  |
| Translation of financial information of foreign operations to presentation currency |  |  |  | |  |  |  |  |  |  |  |  |  |
| Share of other comprehensive income of associates |  |  |  | |  |  |  |  |  |  |  |  |  |
| Income tax recorded directly in other comprehensive income |  |  |  | |  |  |  |  |  |  |  |  |  |
| Gains less losses on investments in equity instruments at FVOCI |  |  |  | |  |  |  |  |  |  |  |  |  |
| Change in fair value attributable to change in the credit risk of financial liabilities at FVTPL |  |  |  | |  |  |  |  |  |  |  |  |  |
| Revaluation of premises and equipment |  |  |  | |  |  |  |  |  |  |  |  |  |
| Remeasurements of post-employment benefit obligations |  |  |  | |  |  |  |  |  |  |  |  |  |
| Income tax recorded directly in other comprehensive income |  |  |  | |  |  |  |  |  |  |  |  |  |
|  |  |  |  | |  |  |  |  |  |  |  |  |  |
|  |  |  |  | |  |  |  |  |  |  |  |  |  |
| **Total other comprehensive income** |  |  |  | |  |  |  |  |  |  |  |  |  |
|  |  |  |  | |  |  |  |  |  |  |  |  |  |

31 Other Comprehensive Income Recognised in Each Component of Equity (Continued)

Analysis of other comprehensive income by item for each component of equity is as follows for the year ended 31 December 2023:

|  |  | **Attributable to owners of the Bank** | | | | | | | | | **Non-controll-ing**  **Interest** | **Total**  **equity** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **Share**  **сapi-tal** | **Share pre-mium** | **Perpe-tual bonds** | **Revalu-ation reserve for invest-ment secure-ties at FVOCI** | **Revalu-ation of financial liabilities attribu-table to own credit risk** | **Reva-luation reserve for pre-mises** | **Cur-rency trans-lation reserve** | **Re-tained**  **ear-nings [Accu-mulated deficit]** | **Total** |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| **Year ended  31 December 2023** |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| Securities at FVOCI: |  |  |  |  |  |  |  |  |  |  |  |  |
| - Gains less losses arising during the year |  |  |  |  |  |  |  |  |  |  |  |  |
| - Gains less losses reclassified to profit or loss on disposal |  |  |  |  |  |  |  |  |  |  |  |  |
| Translation of financial information of foreign operations to presentation currency |  |  |  |  |  |  |  |  |  |  |  |  |
| Share of other comprehensive income of associates |  |  |  |  |  |  |  |  |  |  |  |  |
| Income tax recorded directly in other comprehensive income |  |  |  |  |  |  |  |  |  |  |  |  |
| Gains less losses on investments in equity instruments at FVOCI |  |  |  |  |  |  |  |  |  |  |  |  |
| Change in fair value attributable to change in the credit risk of financial liabilities at FVTPL |  |  |  |  |  |  |  |  |  |  |  |  |
| Revaluation of premises and equipment |  |  |  |  |  |  |  |  |  |  |  |  |
| Remeasurements of post-employment benefit obligations |  |  |  |  |  |  |  |  |  |  |  |  |
| Income tax recorded directly in other comprehensive income |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| **Total other comprehensive income** |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |

31 Other Comprehensive Income Recognised in Each Component of Equity (Continued)

The cumulative amounts recognised in other comprehensive income relating to non-current assets held for sale (or disposal group) are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Revaluation reserve for securities at FVOCI |  |  |
| Revaluation reserve for premises |  |  |
| Currency translation reserve |  |  |
|  |  |  |
|  |  |  |

[***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 the [Country], Euro (“EUR”). *[Consider including additional details if the determination involved significant judgement. Include further details of the functional currency of Group entities, and the basis for the determination, if this is not EUR.]*

Loans between group entities and related foreign exchange gains or losses are eliminated upon consolidation. However, where the loan is between group entities that have different functional currencies, the foreign exchange gain or loss cannot be eliminated in full and is recognised in the consolidated profit or loss, unless the loan is not expected to be settled in the foreseeable future and thus forms part of the net investment in foreign operation. In such a case, the foreign exchange gain or loss is recognised in other comprehensive income.

The results and financial position of each group entity are translated into the presentation currency as follows:

1. assets and liabilities for each statement of financial position presented are translated at the closing rate at the end of the respective reporting period;
2. income and expenses are translated at average exchange rates (unless this average is not a reasonable approximation of the cumulative effect of the rates prevailing on the transaction dates, in which case income and expenses are translated at the dates of the transactions);
3. components of equity are translated at the historic rate; and
4. all resulting exchange differences are recognised in other comprehensive income.

When control over a foreign operation is lost, the exchange differences previously recognised in other comprehensive income are reclassified to profit or loss for the year as part of the gain or loss on disposal. On partial disposal of a subsidiary without loss of control, the related portion of accumulated currency translation differences is reclassified to non-controlling interest within equity.

Goodwill and fair value adjustments arising on the acquisition of a foreign entity are treated as assets and liabilities of the foreign entity and translated at the closing rate.

At 31 December 2024, the principal rate of exchange used for translating foreign currency balances was USD 1 = EUR \_\_\_\_\_ (2023: USD 1 = EUR \_\_\_\_\_\_). The principal average rate of exchange used for translating income and expenses was USD 1 = EUR \_\_\_\_\_ (2023: USD 1 = EUR \_\_\_\_\_\_).]

*[If the Group reports/presents in a currency other than the parent company’s functional currency, it must separately disclose the reasons – IAS 21.53.] [Note that the above policies do not cover hyperinflation.]*

# Interest Income and Expense

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| **Interest income calculated using the effective interest method** |  |  |
| Loans and advances to customers at AC |  | - |
| Debt securities at FVOCI |  | - |
| Debt securities at AC |  |  |
| Due from other banks at AC |  |  |
| Cash and cash equivalents |  |  |
| Repurchase receivables – debt securities at FVOCI |  | - |
| Repurchase receivables – debt securities at AC |  | - |
|  |  |  |
|  |  |  |
| **Total interest income calculated using the effective interest method** |  |  |
|  |  |  |
|  |  |  |
| **Other similar income** |  |  |
| Debt securities at FVTPL |  | - |
| Repurchase receivables – debt securities at FVTPL |  | - |
| Cash and cash equivalents |  |  |
| [Finance lease receivables] |  |  |
| Other |  |  |
|  |  |  |
|  |  |  |
| **Total other similar income** |  |  |
|  |  |  |
|  |  |  |
| **Total interest income** |  |  |
|  |  |  |
|  |  |  |
| **Interest and other similar expense** |  |  |
| Term deposits of legal entities |  |  |
| Debt securities in issue [Promissory notes issued] |  |  |
| Other borrowed funds |  |  |
| Term deposits of individuals |  |  |
| Term placements of other banks |  |  |
| Overnight placements of other banks |  |  |
| Current/settlement accounts |  |  |
| Correspondent accounts of other banks |  |  |
| Other |  |  |
|  |  |  |
|  |  |  |
| **Total interest expense** |  |  |
|  |  |  |
|  |  |  |
| **Other similar expense** |  |  |
| Other borrowed funds at FVTPL |  |  |
| Lease liabilities |  | **-** |
| Other |  |  |
|  |  |  |
|  |  |  |
| **Total other similar expense** |  |  |
|  |  |  |
|  |  |  |
| **Total interest expense** |  |  |
|  |  |  |
|  |  |  |
| **Net margin on interest and similar income** |  |  |
|  |  |  |

**32 Interest Income and Expense (Continued)**

[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. [Interest income on debt instruments at FVTPL calculated at nominal interest rate is presented within ‘other similar income’ line in profit or loss.]

[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.[

[If the credit risk on the financial asset classified in Stage 3 subsequently improves so that the asset is no longer credit-impaired and the improvement can be related objectively to an event occurring after the asset had been determined as credit-impaired (ie the asset becomes cured), the asset is reclassified from stage 3 and the interest revenue is calculated by applying the EIR to the gross carrying amount. The additional interest income, which was previously not recognised in P&L due to the asset being in stage 3 but it is now expected to be received following the asset’s curing, is recognised as a reversal of impairment.]

# Fee and Commission Income and Expense

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **2024** | | | | **2023** | | | |
| *In thousands of EUR* | **Retail ban-king** | **Cor-porate ban-king** | **In-vest-ment ban-king** | **Total** | **Retail ban-king** | **Cor-porate ban-king** | **In-vest-ment ban-king** | **Total** |
|  |  |  |  |  |  |  |  |  |
| **Fee and commission income** |  |  |  |  |  |  |  |  |
| *Fee and commission income not relating to financial instruments at FVTPL:* |  |  |  |  |  |  |  |  |
| - Settlement transactions |  |  |  |  |  |  |  |  |
| - Cash transactions |  |  |  |  |  |  |  |  |
| - Cash collection |  |  |  |  |  |  |  |  |
| - Transactions with securities |  |  |  |  |  |  |  |  |
| - Fiduciary activities |  |  |  |  |  |  |  |  |
| - Factoring services |  |  |  |  |  |  |  |  |
| - Asset management services |  |  |  |  |  |  |  |  |
| - Financial guarantees issued (Note 43) |  |  |  |  |  |  |  |  |
| - Performance guarantees issued (Note 43) |  |  |  |  |  |  |  |  |
| - Other |  |  |  |  |  |  |  |  |
| *Fee and commission income in respect of financial instruments at FVTPL* |  |  |  |  |  |  |  |  |
| - Fees charged to counterparties for selling futures contracts |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total fee and commission income** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Fee and commission expense** |  |  |  |  |  |  |  |  |
| *Fee and commission expense not relating to financial instruments at FVTPL* |  |  |  |  |  |  |  |  |
| - Settlement transactions |  |  |  |  |  |  |  |  |
| - Cash transactions |  |  |  |  |  |  |  |  |
| - Cash collection |  |  |  |  |  |  |  |  |
| - Transactions with securities |  |  |  |  |  |  |  |  |
| - Other |  |  |  |  |  |  |  |  |
| *Fee and commission expense in respect of financial instruments at FVTPL* |  |  |  |  |  |  |  |  |
| - Fees paid to stock exchange to purchase or sell futures contracts |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total fee and commission expense** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Net fee and commission income/[(expense)]** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

**33 Fee and Commission Income and Expense (Continued)**

***[***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, account subscription fees, premium service package fees, portfolio and other asset management advisory and service fees, wealth management and financial planning services, or fees for servicing loans on behalf of third parties, 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.

***Fiduciary assets and custody services.*** Assets held by the Group in its own name, but on the account of third parties, are not reported in the consolidated statement of financial position. The amount of the fee received or receivable represents the consideration for the services.

These fees are recognised over time, on a straight-line basis, when the services are rendered because the customer simultaneously receives and consumes the benefits as the Group performs. Fees from fiduciary activities are presented within fee and commission income.

***Customer loyalty program.*** The group operates a loyalty program where retail clients accumulate points, which entitle them to discounts on future services. Revenue from the award points is recognised when the points are redeemed or when they expire [twelve] months after the initial transaction. The amount of revenue is estimated based on the number of points redeemed relative to the total number expected to be redeemed. A contract liability is recognised for the amount of fair value of points expected to be redeemed until they are actually redeemed or expire.]

The Group has recognised the following contract liabilities that represent performance obligations from contracts with customers. The obligations are short-term. Refer to Note 27.

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **31 December**  **2024** | **31 December**  **2023** |
|  |  |  |
| Fiduciary activities |  |  |
| Custody services |  |  |
| Asset management services |  |  |
| Customer loyalty program |  |  |
| Other |  |  |
|  |  |  |
|  |  |  |
| **Total contract liabilities** |  |  |
|  |  |  |

*[Explain significant changes in contract liabilities as required by IFRS 15.118.]*

**33 Fee and Commission Income and Expense (Continued)**

The following table shows how much of the revenue recognised in the current reporting period relates to contract liabilities recognised in prior period. It also presents variable fee income related to performance obligations satisfied in prior reporting periods.

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| *Revenue recognised that was included in the contract liability balance at the beginning of the period* |  |  |
| - Fiduciary activities |  |  |
| - Custody services |  |  |
| - Financial guarantees issued (Note 43) |  |  |
| - Performance guarantees issued (Note 43) |  |  |
| - Factoring services |  |  |
| - Asset management services |  |  |
| - Customer loyalty program |  |  |
| - Other |  |  |
|  |  |  |
| *Revenue recognised from performance obligations satisfied in previous periods*  - Asset management services (variable fee income) |  |  |
|  |  |  |

Refer to Note 3 that describes the types of revenues recognised on a point in time basis and on the over time basis.

# Other Operating Income

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **2024** | **2023** |
|  |  |  |  |
| Dividend income from equity investments at FVOCI that were held at the end of the period |  |  | - |
| Dividend income from equity investments at FVOCI that relate to investments derecognised during the period |  |  | - |
| Other dividend income |  |  |  |
| Rental income from investment properties |  |  |  |
| Sublease operating lease income |  |  |  |
| Income from variable lease payments not included in finance lease receivables |  |  |  |
| Negative goodwill recognised as income | 52 |  |  |
| Gain on disposal of premises and equipment |  |  |  |
| Gain on disposal of investment properties |  |  |  |
|  |  |  |  |
| Other |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total other operating income** |  |  |  |
|  |  |  |  |

# Administrative and Other Operating Expenses

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **2024** | **2023** |
|  |  |  |  |
| Staff costs |  |  |  |
| Depreciation of premises and equipment | [18](#_heading=h.1pxezwc) |  |  |
| Depreciation of right of use assets | 19 |  |  |
| Impairment of premises and equipment | [18](#_heading=h.1pxezwc) |  |  |
| Reversals of impairment of premises and equipment | [18](#_heading=h.1pxezwc) |  |  |
| Impairment of goodwill | [17](#_heading=h.1pxezwc) |  |  |
| Amortisation of software and other intangible assets | [18](#_heading=h.1pxezwc) |  |  |
| Utilities |  |  |  |
| Short-term lease expense |  |  |  |
| Low-value assets lease expense |  |  |  |
| Other costs of premises and equipment |  |  |  |
| Professional services |  |  |  |
| Advertising and marketing services |  |  |  |
| Security services |  |  |  |
| Taxes other than on income |  |  |  |
| Provisions for tax risks | [25](#_heading=h.41mghml) |  |  |
| Provisions for performance guarantees | [43](#_heading=h.2dlolyb) |  |  |
| Write-down of non-current assets (or disposal groups) to fair value less costs to sell | 20 |  |  |
| Other |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total administrative and other operating expenses** |  |  |  |
|  |  |  |  |

***Staff costs.*** Wages, salaries, contributions to the state pension and social insurance funds, paid annual leave and sick leave, bonuses, and non-monetary benefits are accrued in the year in which the associated services are rendered by the employees of the 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.

Included in staff costs are statutory pension contributions of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand).

[Included in staff costs is the amount of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand), which represents share-based remuneration provided to the Group’s personnel directly by shareholders.]

***Direct operating expenses for investment properties*** that generate rental income amounted to EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) and consisted of costs of utilities and staff costs. Direct operating expenses for investment properties that did not generate rental income amounted to EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand).

***[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.]

# Income Taxes

***(a) Components of income tax expense / (benefit)***

Income tax expense [credit] [recorded in profit or loss for the year] comprises the following:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Current tax |  |  |
| Deferred tax |  |  |
|  |  |  |
|  |  |  |
| **Income tax expense/(credit) for the year** |  |  |
|  |  |  |

[Income taxes have been provided for in the [consolidated] 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.

[The tax benefits of distributions on perpetual bonds classified as equity (treated as liabilities for tax purposes) are recognised in profit or loss because these tax benefits are linked more directly to past transactions or events that generated distributable profits than to the distributions to owners.]

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 [consolidated] 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 liabilities are not recorded for temporary differences on initial recognition of goodwill, and subsequently for goodwill which is not deductible for tax purposes.] 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.]

36 Income Taxes (Continued)

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

***(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 2024 income is 21% (2023: 21%). The income tax rate applicable to the majority of income of subsidiaries ranges from \_\_\_\_\_% to \_\_\_\_\_% (2023: from \_\_\_\_\_% to \_\_\_\_\_%). A reconciliation between the expected and the actual taxation charge is provided below.

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| **Profit/(loss) before tax** |  |  |
|  |  |  |
|  |  |  |
| Theoretical tax charge [credit] at statutory rate (2024: 21%; 2023: 21%) |  |  |
|  |  |  |
| Tax effect of items which are not deductible or assessable for taxation purposes: |  |  |
| - Income which is exempt from taxation |  |  |
| - Non-deductible expenses |  |  |
| - Income on government securities taxed at different rates |  |  |
| - Loss/(income) earned in tax free jurisdictions |  |  |
| Under/over provision of current tax in prior years |  |  |
| [Effects of different tax rates in other countries] |  |  |
| Changes in expected manner of recovery or settlement resulting from controlled foreign company legislation |  |  |
| Unrecognised tax loss carry forwards |  |  |
| Unrecognised other potential deferred tax assets |  |  |
| Utilisation of previously unrecognised tax loss carry forwards |  |  |
| Recognition of previously unrecognised other deferred tax assets |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| **Income tax expense/(credit) for the year** |  |  |
|  |  |  |

***(c) Tax loss carry forwards***

The Group has unrecognised potential deferred tax assets in respect of unused tax loss carry forwards of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand).

The Group also has unrecognised potential deferred tax assets in respect of deductible temporary differences of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand).

***(d) Deferred taxes in respect of subsidiaries, joint ventures and associates***

The Group has not recorded a deferred tax liability in respect of temporary differences of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) associated with investments in subsidiaries [associates and joint ventures] as the Group is able to control the timing of the reversal of those temporary differences, and does not intend to reverse them in the foreseeable future.

36 Income Taxes (Continued)

[Management has performed an analysis of the dividend policies at the Group’s associates and joint ventures with regards to the Group’s potential deferred tax liabilities where the Group does not control reversal of the temporary difference, or expects the reversal to occur in the foreseeable future. For [list of associates and JVs], management expects that the carrying value of the investments would be recovered primarily through a sale and partially through dividends. No deferred taxes relating to a future sale are recognised in respect of [list associates and JVs], because any sale would occur in a tax free jurisdiction. Deferred taxes relating to a future sale are recognised in respect of [list associates and JVs] because these are held through subsidiaries in taxable jurisdictions, [Ukraine].

***(e) Uncertain income tax positions***

***Uncertain income tax positions.*** Current income tax liabilities include EUR \_\_\_\_ thousand in respect of uncertainties relating to tax deductions taken for [describe type of expenses]. Management estimates that these exposures are more likely than not to require settlement if challenged by the tax authorities. Related penalties and interest are accrued and disclosed in Note 35 as operating expenses. The balance at 31 December 2024 is expected to be either fully utilised or released when the inspection rights of the tax authorities with respect to the relevant tax returns expire, as follows: EUR \_\_\_\_ thousand by the end of 2024, EUR \_\_\_\_ thousand by the end of 2024 and EUR \_\_\_\_\_ thousand by the end of 2025.

***(f) Deferred taxes analysed by type of temporary difference***

Differences between IFRS and statutory taxation regulations in [Country] [and other countries] 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 is detailed below.

| *In thousands of EUR* | **1 January 2024** | **Business combi-nations** | **Transfer to non-current held for sale** | **Credited/ (charged) to profit or loss** | **Credited/ (charged) to other compre-hensive income** | **Credited/ (charged) directly to equity** | **31 Decem-ber**  **2024** |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |  |  |
| **Tax effect of deductible/(taxable) temporary differences [and tax loss carry forwards]** |  |  |  |  |  |  |  |
| Premises and equipment: |  |  |  |  |  |  |  |
| Credit loss allowance of loans |  |  |  |  |  |  |  |
| Fair valuation of securities at FVTPL |  |  |  |  |  |  |  |
| Fair valuation of securities at FVOCI |  |  |  |  |  |  |  |
| Credit loss allowance of securities at AC |  |  |  |  |  |  |  |
| Fair valuation of financial liabilities at FVTPL |  |  |  |  |  |  |  |
| Associates |  |  |  |  |  |  |  |
| Accruals |  |  |  |  |  |  |  |
| Tax loss carry forwards |  |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **Net deferred tax asset/(liability)** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Recognised deferred tax asset |  |  |  |  |  |  |  |
| Recognised deferred tax liability |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **Net deferred tax asset/(liability)** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

36 Income Taxes (Continued)

In the context of the Group’s current structure and [Country] 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. *[Tailor wording if non-[Country] tax legislation also applies to Group entities.]*

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **1 January 2023** | **Business combi-nations** | **Transfer to non-current held for sale** | **Credited/ (charged) to profit or loss** | **Credited/ (charged) to other compre-hensive income** | **Credited/ (charged) directly to equity** | **31 Decem-ber**  **2024** |
|  |  |  |  |  |  |  |  |
| **Tax effect of deductible/(taxable) temporary differences [and tax loss carry forwards]** |  |  |  |  |  |  |  |
| Premises and equipment |  |  |  |  |  |  |  |
| Credit loss allowance of loans |  |  |  |  |  |  |  |
| Fair valuation of securities at FVTPL |  |  |  |  |  |  |  |
| Fair valuation of securities at FVOCI |  |  |  |  |  |  |  |
| Credit loss allowance of securities at AC |  |  |  |  |  |  |  |
| Associates |  |  |  |  |  |  |  |
| Accruals |  |  |  |  |  |  |  |
| Tax loss carry forwards |  |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **Net deferred tax asset/(liability)** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Recognised deferred tax asset |  |  |  |  |  |  |  |
| Recognised deferred tax liability |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **Net deferred tax asset/(liability)** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

36 Income Taxes (Continued)

***(g) Current and deferred tax effects relating to each component of other comprehensive income***

Current and deferred tax effects relating to each component of other comprehensive income are as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **2024** | | | **2023** | | |
| **Before-tax amount** | **Income tax (expense) / benefit** | **Net-of-tax amount** | **Before-tax amount** | **Income tax (expense) / benefit** | **Net-of-tax amount** |
|  |  |  |  |  |  |  |
| Debt securities at FVOCI: |  |  |  |  |  |  |
| - Gains arising during the year |  |  |  |  |  |  |
| - Reclassification adjustments for gains included in profit or loss |  |  |  |  |  |  |
| Equity securities at FVOCI: |  |  |  |  |  |  |
| - Gains arising during the year |  |  |  |  |  |  |
| Change in fair value of financial liabilities at FVTPL |  |  |  |  |  |  |
| - Gains arising during the year |  |  |  |  |  |  |
| - Reclassification adjustments for gains included in profit or loss |  |  |  |  |  |  |
| Revaluation of premises [and equipment] |  |  |  |  |  |  |
| Share of other comprehensive income of associates |  |  |  |  |  |  |
| [Exchange differences on translation to presentation currency] |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Other comprehensive income** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

# Dividends

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **2024** | | | **2023** | | |
| *In thousands of EUR* | **Ordinary** | **Prefe-rence** | **Perpetual bonds** | **Ordinary** | **Prefe-rence** | **Perpetual bonds** |
|  |  |  |  |  |  |  |
| **Dividends payable at 1 January** |  |  |  |  |  |  |
| Dividends declared during the year |  |  |  |  |  |  |
| Dividends paid during the year |  |  |  |  |  |  |
| [Translation to presentation currency] |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Dividends payable at 31 December** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Dividends per share (or bond) declared during the year** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

All dividends or discretionary interest on perpetual bonds are declared and paid in EUR.

# 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 EUR* | **Other borrowed funds** | | **[Syndicated] long term borrowings from other banks** | **Subor-dinated debt** | **Lease liabilities** | **Deriva-tives** | **Total** |
|  |  | |  |  |  |  |  |
| **Liabilities from financing activities at 1 January 2023** |  | |  |  |  |  |  |
|  |  | |  |  |  |  |  |
|  |  | |  |  |  |  |  |
| Cash flows |  | |  |  |  |  |  |
| Business combinations |  | |  |  |  |  |  |
| Changes in fair values |  | |  |  |  |  |  |
| Foreign exchange adjustments |  | |  |  | - |  |  |
| Other non-cash movements |  | |  |  |  |  |  |
|  |  | |  |  |  |  |  |
|  |  | |  |  |  |  |  |
| **Liabilities from financing activities at 31 December 2023** |  | |  |  | - |  |  |
|  |  | |  |  |  |  |  |
|  |  | |  |  |  |  |  |
| Cash flows |  | |  |  |  |  |  |
| Business combinations |  | |  |  |  |  |  |
| Changes in fair values |  | |  |  |  |  |  |
| Foreign exchange adjustments |  | |  |  |  |  |  |
| Other non-cash movements |  | |  |  |  |  |  |
|  |  | |  |  |  |  |  |
|  |  | |  |  |  |  |  |
| **Liabilities from financing activities at 31 December 2024** |  | |  |  |  |  |  |
|  |  | |  |  |  |  |  |

# Earnings [Loss] per Share

Basic earnings/(loss) per share are calculated by dividing the profit or loss attributable to owners of the Parent by the weighted average number of ordinary shares in issue during the year, excluding treasury shares. *[If you have a rights issue the wording above should be amended in accordance with IAS 33.]*

39 Earnings [Loss] per Share (Continued)

The Bank has no dilutive potential ordinary shares; therefore, the diluted earnings per share equal the basic earnings per share. Earnings per share are calculated as follows:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR except for number of shares* | **Note** | **2024** | **2023** |
|  |  |  |  |
| Profit/(loss) for the year attributable to the shareholders of the Bank |  |  |  |
| Less preference dividends declared  Less undistributed profit or loss for the year attributable to preference shareholders based on terms of the shares |  |  |  |
| Less interest payments on perpetual subordinated loan |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Profit or loss for the year attributable to the ordinary shareholders of the Bank |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Weighted average number of ordinary shares in issue (thousands) | 29 |  |  |
|  |  |  |  |
| **Basic and diluted earnings/(loss) per ordinary share (expressed in EUR per share)** |  |  |  |
|  |  |  |  |

# Segment Analysis

Operating segments are components that engage in business activities that may earn revenues or incur expenses, whose operating results are regularly reviewed by the chief operating decision maker (CODM), and for which discrete financial information is available. The CODM is the person ‒ or group of persons ‒ who allocates resources and assesses the performance for the entity. The functions of the CODM are performed by [the Board of Directors (management board)] of the Group.

***(a) Description of products and services from which each reportable segment derives its revenue***

The Group is organised on the basis of [three] main business segments:

* Retail banking – representing private banking services, private customer current accounts, savings, deposits, investment savings products, custody, credit and debit cards, consumer loans and mortgages;
* Corporate banking – representing direct debit facilities, current accounts, deposits, overdrafts, loan and other credit facilities, foreign currency and derivative products;
* Investment banking – representing financial instruments trading, structured financing, corporate leasing, merger and acquisitions advice.

***(b) Factors that management used to identify the reportable segments***

The Group’s segments are strategic business units that focus on different customers. They are managed separately because each business unit requires different [marketing strategies and service level].

40 Segment Analysis (Continued)

Segment financial information reviewed by the CODM includes [loans and advances to customers] of the Group’s subsidiaries, but not their results and other items in the statement of financial position. Regular review of these subsidiary banks is delegated to the local management teams. The CODM obtains financial statements of the Group’s subsidiaries. Such financial information overlaps with segment analysis provided internally to the CODM. Management, therefore, applied the core principle of IFRS 8 “Operating Segments”, in determining which of the overlapping financial information sets should form the basis of operating segments. Management considered that information on subsidiary banks is available less frequently in concluding that segments exclude details of the subsidiaries other than information about [their loan portfolios].

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

The CODM reviews financial information prepared based on [Country] Accounting Rules adjusted to meet the requirements of internal reporting. Such financial information differs in certain aspects from IFRS:

1. the fair value changes in securities carried at FVOCI are reported within the segments’ profits or losses rather than in other comprehensive income;
2. funds are generally reallocated between segments at internal interest rates set by the treasury department, which are determined by reference to market interest rate benchmarks, contractual maturities for loans and observed actual maturities of customer accounts balances;
3. income taxes are not allocated to segments;
4. loan provisions are recognised based IFRS 9 and interpretations issued by the NBC, and can be different from provisions reported under IFRS;
5. commission income relating to lending is recognised immediately rather than deferred using the effective interest method; and
6. liabilities for the Group’s post-employment obligations are not recognised.

The CODM evaluates performance of each segment based on [profit before tax].

***(d) Information about reportable segment profit or loss, assets and liabilities***

Segment information for the reportable segments for the year ended 31 December 2024 is set out below:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Retail**  **banking** | **Corporate banking** | **Investment banking** | **[Other]** | **Elimina-tions** | **Total** |
|  |  |  |  |  |  |  |
| Non-current assets held for sale (or disposal groups) |  |  |  |  |  |  |
| Investment in associates |  |  |  |  |  |  |
| [Other] reportable segment assets |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total reportable segment assets** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Liabilities directly associated with disposal groups held for sale |  |  |  |  |  |  |
| [Other] reportable segment liabilities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total reportable segment liabilities** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Capital expenditure** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

40 Segment Analysis (Continued)

Capital expenditure represents additions to non-current assets other than financial instruments, deferred tax assets, post-employment benefit assets and rights arising under insurance contracts.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Retail**  **banking** | **Corporate banking** | **Investment banking** | | **[Other]** | **Elimina-tions** | **Total** |
|  |  |  |  | |  |  |  |
| **2024** |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
| *External revenues:* |  |  |  | |  |  |  |
| - Interest income |  |  |  | |  |  |  |
| - Fee and commission income |  |  |  | |  |  |  |
| - Other operating income |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
| Revenues from other segments |  |  |  | |  |  |  |
| - Interest income |  |  |  | |  |  |  |
| - Fee and commission income |  |  |  | |  |  |  |
| - Other operating income |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
| **Total revenues** |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
| Timing of revenue recognition: |  |  |  | |  |  |  |
| - At point in time |  |  |  | |  |  |  |
| - Over time |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
| Interest expense |  |  |  |  | |  |  |
| Credit loss allowance |  |  |  |  | |  |  |
| Impairment of debt securities at FVOCI |  |  |  |  | |  |  |
| Provision for credit related commitments |  |  |  |  | |  |  |
| Fee and commission expense |  |  |  |  | |  |  |
| Gains less losses from financial derivatives |  |  |  |  | |  |  |
| Gains less losses from securities at FVTPL |  |  |  |  | |  |  |
| Gains less losses from trading in foreign currencies |  |  |  |  | |  |  |
| Gains less losses on revaluation of investment properties |  |  |  |  | |  |  |
| Foreign exchange translation gains less losses |  |  |  |  | |  |  |
| Gains less losses from disposals of debt securities at FVOCI |  |  |  |  | |  |  |
| Gains/(losses) arising from early retirement of debt |  |  |  |  | |  |  |
| Administrative and other operating expenses |  |  |  |  | |  |  |
| Share of result of associates |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
| **Segment result** |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |

40 Segment Analysis (Continued)

Segment information for the reportable segments for the year ended 31 December 2023 is set out below:

| *In thousands of EUR* | **Retail**  **banking** | **Corporate banking** | **Investment banking** | **[Other]** | | **Elimina-tions** | **Total** |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  |  | |  |  |
| Non-current assets held for sale (or disposal groups) |  |  |  |  | |  |  |
| Investment in associates |  |  |  |  | |  |  |
| [Other] reportable segment assets |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
| **Total reportable segment assets** |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
| Liabilities directly associated with disposal groups held for sale |  |  |  |  | |  |  |
| [Other] reportable segment liabilities |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
| **Total reportable segment liabilities** |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
| **Capital expenditure** |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
|  |  |  |  | |  |  |  |
| *External revenues:* |  |  |  | |  |  |  |
| - Interest income |  |  |  | |  |  |  |
| - Fee and commission income |  |  |  | |  |  |  |
| - Other operating income |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
| Revenues from other segments |  |  |  | |  |  | - |
| - Interest income |  |  |  | |  |  |  |
| - Fee and commission income |  |  |  | |  |  |  |
| - Other operating income |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
| **Total revenues** |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
|  |  |  |  | |  |  |  |
| Interest expense |  |  |  |  | |  |  |
| Credit loss allowance |  |  |  |  | |  |  |
| Impairment of debt securities at FVOCI |  |  |  |  | |  |  |
| Impairment of debt securities at AC |  |  |  |  | |  |  |
| Provision for credit related commitments |  |  |  |  | |  |  |
| Fee and commission expense |  |  |  |  | |  |  |
| Gains less losses from financial derivatives |  |  |  |  | |  |  |
| Gains less losses from securities at FVTPL |  |  |  |  | |  |  |
| Gains less losses from trading in foreign currencies |  |  |  |  | |  |  |
| Gains less losses on revaluation of investment properties |  |  |  |  | |  |  |
| Foreign exchange translation gains less losses |  |  |  |  | |  |  |
| Gains less losses from disposals of debt securities at FVOCI |  |  |  |  | |  |  |
| Gains/(losses) arising from early retirement of debt |  |  |  |  | |  |  |
| Administrative and other operating expenses |  |  |  |  | |  |  |
| Share of result of associates |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |
| **Segment result** |  |  |  |  | |  |  |
|  |  |  |  |  | |  |  |

40 Segment Analysis (Continued)

***(e) Reconciliation of reportable segment revenues, profit or loss, assets and liabilities***

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| **Total revenues for reportable segments** |  |  |
|  |  |  |
| (a) [description of each adjustment] |  |  |
| (b) [description of each adjustment] |  |  |
| (c) [description of each adjustment] |  |  |
|  |  |  |
|  |  |  |
| **Total consolidated revenues** |  |  |
|  |  |  |

Total consolidated revenues comprise interest income, fee and commission income and other operating income.

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| **Total reportable segment result** |  |  |
|  |  |  |
| (a) [description of each adjustment] |  |  |
| (b) [description of each adjustment] |  |  |
| (c) [description of each adjustment] |  |  |
|  |  |  |
|  |  |  |
| **Profit or loss before tax** |  |  |
|  |  |  |

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| **Total reportable segment assets** |  |  |
|  |  |  |
| (a) [description of each adjustment] |  |  |
| (b) [description of each adjustment] |  |  |
| (c) [description of each adjustment] |  |  |
|  |  |  |
|  |  |  |
| **Total consolidated assets** |  |  |
|  |  |  |

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| **Total reportable segment liabilities** |  |  |
|  |  |  |
| (a) [description of each adjustment] |  |  |
| (b) [description of each adjustment] |  |  |
| (c) [description of each adjustment] |  |  |
|  |  |  |
|  |  |  |
| **Total consolidated liabilities** |  |  |
|  |  |  |

40 Segment Analysis (Continued)

Reconciliation of other material items of income or expenses for the year ended 31 December 2024 is as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Total amount for all reportable segments** | **[Adjust-ment 1]** | **[Adjust-ment 2]** | **[Adjust-ment 3]** | **[Adjust-ment 4]** | **As reported under IFRS** |
|  |  |  |  |  |  |  |
| **Material income or expenses for year ended 31 December 2024** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| *External revenues:* |  |  |  |  |  |  |
| - Interest income |  |  |  |  |  |  |
| - Fee and commission income |  |  |  |  |  |  |
| - Other operating income |  |  |  |  |  |  |
| Interest expense |  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |  |
| Impairment of debt securities at FVOCI |  |  |  |  |  |  |
| Impairment of debt securities at AC |  |  |  |  |  |  |
| Fee and commission expense |  |  |  |  |  |  |
| Gains less losses from financial derivatives |  |  |  |  |  |  |
| Gains less losses from securities at FVTPL |  |  |  |  |  |  |
| Gains less losses from trading in foreign currencies |  |  |  |  |  |  |
| Gains less losses on revaluation of investment properties |  |  |  |  |  |  |
| Foreign exchange translation gains less losses |  |  |  |  |  |  |
| Gains less losses from disposals of investment securities at FVOCI |  |  |  |  |  |  |
| Gains/(losses) arising from early retirement of debt |  |  |  |  |  |  |
| Administrative and other operating expenses |  |  |  |  |  |  |
| Share of result of associates |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

The reconciling items are attributable to the following:

1. [description of each adjustment];
2. [description of each adjustment];
3. [description of each adjustment];

40 Segment Analysis (Continued)

Reconciliation of other material items of income or expenses for the year ended 31 December 2023 is as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Total amount for all reportable segments** | **[Adjust-ment 1]** | **[Adjust-ment 2]** | **[Adjust-ment 3]** | **[Adjust-ment 4]** | **As reported under IFRS** |
|  |  |  |  |  |  |  |
| **Material income or expenses for year ended 31 December 2023** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| *External revenues:* |  |  |  |  |  |  |
| - Interest income |  |  |  |  |  |  |
| - Fee and commission income |  |  |  |  |  |  |
| - Other operating income |  |  |  |  |  |  |
| Interest expense |  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |  |
| Impairment of debt securities at FVOCI |  |  |  |  |  |  |
| Impairment of debt securities at AC |  |  |  |  |  |  |
| Fee and commission expense |  |  |  |  |  |  |
| Gains less losses from financial derivatives |  |  |  |  |  |  |
| Gains less losses from securities at FVTPL |  |  |  |  |  |  |
| Gains less losses from trading in foreign currencies |  |  |  |  |  |  |
| Gains less losses on revaluation of investment properties |  |  |  |  |  |  |
| Foreign exchange translation gains less losses |  |  |  |  |  |  |
| Gains less losses from disposals of investment securities at FVOCI |  |  |  |  |  |  |
| Gains/(losses) arising from early retirement of debt |  |  |  |  |  |  |
| Administrative and other operating expenses |  |  |  |  |  |  |
| Share of result of associates |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

The reconciling items are attributable to the following:

1. [description of each adjustment];
2. [description of each adjustment];
3. [description of each adjustment];

40 Segment Analysis (Continued)

Reconciliation of material assets and liabilities at 31 December 2024 and of capital expenditure for 2024 is as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Total amount for all reportable segments** | **[Adjust-ment 1]** | **[Adjust-ment 2]** | **[Adjust-ment 3]** | **[Adjust-ment 4]** | **As reported under IFRS** |
|  |  |  |  |  |  |  |
| ***Assets at 31 December 2024*** |  |  |  |  |  |  |
| Non-current assets held for sale (or disposal groups) |  |  |  |  |  |  |
| Investment in associates |  |  |  |  |  |  |
| Other reportable segment assets |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Liabilities at 31 December 2024*** |  |  |  |  |  |  |
| Liabilities directly associated with disposal groups held for sale |  |  |  |  |  |  |
| Other reportable segment liabilities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Capital expenditure for 2024** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

The reconciling items are attributable to the following:

1. [description of each adjustment];
2. [description of each adjustment];
3. [description of each adjustment];

Reconciliation of material assets and liabilities at 31 December 2023 and of capital expenditure for 2023 is as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Total amount for all reportable segments** | **[Adjust-ment 1]** | **[Adjust-ment 2]** | **[Adjust-ment 3]** | **[Adjust-ment 4]** | **As reported under IFRS** |
|  |  |  |  |  |  |  |
| ***Assets at 31 December 2023*** |  |  |  |  |  |  |
| Non-current assets held for sale (or disposal groups) |  |  |  |  |  |  |
| Investment in associates |  |  |  |  |  |  |
| Other reportable segment assets |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Liabilities at 31 December 2023*** |  |  |  |  |  |  |
| Liabilities directly associated with disposal groups held for sale |  |  |  |  |  |  |
| Other reportable segment liabilities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Capital expenditure for 2023** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

40 Segment Analysis (Continued)

The reconciling items are attributable to the following:

1. [description of each adjustment];
2. [description of each adjustment];
3. [description of each adjustment];

***(f) Analysis of revenues by products and services***

The Group’s revenues are analysed by products and services in Notes 32 (interest income), Note 33 (fee and commission income) and in Note 34 (other operating income).

***(g) Geographical information***

Revenues for each individual country for which the revenues are material are reported separately, as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| [Country] |  |  |
| Czech Republic |  |  |
| Poland |  |  |
| Other EU countries  Other non-EU countries |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| **Total consolidated revenues** |  |  |
|  |  |  |

The analysis is based on domicile of the customer. Revenues comprise interest income, fee and commission income and other operating income.

Capital expenditure for each individual country for which it is material is reported separately, as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| [Country] |  |  |
| Czech Republic |  |  |
| Poland |  |  |
| Other EU countries  Other non-EU countries |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| **Total capital expenditure** |  |  |
|  |  |  |

The analysis is based on location of assets. Capital expenditure represents additions to non-current assets other than financial instruments, deferred tax assets, post-employment benefit assets and rights arising under insurance contracts.

40 Segment Analysis (Continued)

***(h) Major customers***

Revenues from customers which represent 10% or more of the total revenues are as follows:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Retail**  **banking** | **Corporate banking** | **Investment banking** | **[Other]** | **Total** |
|  |  |  |  |  |  |
| **2024** |  |  |  |  |  |
|  |  |  |  |  |  |
| [Customer 1] |  |  |  |  |  |
| [Customer 2] |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total revenues for 2024** |  |  |  |  |  |
|  |  |  |  |  |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Retail**  **banking** | **Corporate banking** | **Investment banking** | **[Other]** | **Total** |
|  |  |  |  |  |  |
| **2023** |  |  |  |  |  |
|  |  |  |  |  |  |
| [Customer 1] |  |  |  |  |  |
| [Customer 2] |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total revenues for 2023** |  |  |  |  |  |
|  |  |  |  |  |  |

Management considered the extent of economic integration between entities controlled by the same local government, and concluded that entities under the control of the government are not in general a single customer for the purposes of the above disclosure. Revenues comprise interest income, fee and commission income and other operating income.

[The Group does not have customers with the revenues exceeding 10% of the total revenue of the Group.]

# Financial Risk Management

The risk management function within the Group is carried out with respect to financial risks, operational risks and legal risks. Financial risk comprises market risk (including currency risk, interest rate risk and other price risks), credit risk and liquidity risk. The primary function of financial risk management is to establish risk limits and to ensure that any exposure to risk stays within these limits. The operational and legal risk management functions are intended to ensure the proper functioning of internal policies and procedures in order to minimise operational and legal risks.

***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 credit committees that are responsible for approving credit limits for individual borrowers:

* The senior credit committee reviews and approves limits above EUR \_\_\_ thousand and meets monthly. It is also responsible for issuing guidance to lower-level credit committees;
* The junior credit committees review and approve credit limits below EUR \_\_\_ thousand and meet weekly.]

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 [credit department’s] officers 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 Board of Directors].

41 Financial Risk Management (Continued)

*Credit risk grading system*. For measuring credit risk and grading financial instruments by the amount of credit risk, the Group applies two approaches – an Internal Risk-Based (IRB) rating system or risk grades estimated by external international rating agencies (Standard & Poor’s – “S&P”, Fitch, Moody’s). 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** | **Corresponding internal ratings** | **Corresponding ratings of external international rating agencies (S&P)** | **Corresponding PD interval** |
|  |  |  |  |
| Excellent | [1 – 6] | AAA to BB+ | 0,01% – 0,5% |
|  |  |  |  |
| Good | [7 – 14] | BB to B+ | 0,51% – 3% |
|  |  |  |  |
| Satisfactory | [15 – 21] | B, B- | 3% – 10% |
|  |  |  |  |
| Special monitoring | [22 – 25] | CCC+ to CC- | 10% – 99,9% |
|  |  |  |  |
| Default | [26 – 30] | 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.

The IRB system is designed internally and ratings are estimated by management. Various credit-risk estimation techniques are used by the Group depending on the class of the asset. There are three commonly used types of such systems:

* *Model-based* – In this system, credit risk ratings are assigned by internally developed statistical models with the limited involvement of credit officers. Statistical models include qualitative and quantitative information that shows the best predictive power based on historical data on defaults.
* *Expert judgement-based* – In this system, credit risk ratings are assigned subjectively by experienced credit officers based on internally developed methodology and different qualitative and quantitative factors. This approach is based on expert methodology and judgements rather than on sophisticated statistical models.
* *Hybrid* – This rating system is a combination of the two systems above. It is developed by using historical data combined with expert input.

The Group applies IRB systems for measuring credit risk for the following financial assets: [corporate loans, SMEs and finance lease receivables].

The rating models are regularly reviewed by [the Credit Risk Department], backtested on actual default data and updated, if necessary. Despite the method used, the Group regularly validates the accuracy of ratings estimates and appraises the predictive power of the models.

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 and promissory notes purchased).]

41 Financial Risk Management (Continued)

***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 isa coefficient that shows the probability of conversion of the committed amounts to an on-balance sheet exposure within a defined period. [The Group’s management estimates that 12-month and lifetime CCFs are materially the same.] PDan estimate of the likelihood of default to occur over a given time period. LGDis 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, for credit cards issued to individuals, the lifetime exposure is measured over a period that is based on expected life of the credit card contracts, based on internal statistics, and it is equal on average to [3] to [5] years.

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.

The ECL modelling does not differ for Purchased or Originated Credit Impaired (“POCI”) financial assets, except that (a) gross carrying value and discount rate are based on cash flows that were recoverable at initial recognition of the asset, rather than based on contractual cash flows, and (b) the ECL is always a lifetime ECL. POCI assets are financial assets that are credit-impaired upon initial recognition, such as impaired loans acquired in a past business combination.

41 Financial Risk Management (Continued)

The Group uses definition of default that is consistent with Article 178 of Regulation (EU) No 575/2013 (Capital Requirements Regulation – CRR). Overdue days are defined as the number of consecutive days when the arrears of the customer facility are continuous and simultaneously above both (a) absolute threshold and (b) relative materiality threshold. For purposes of measuring PD, the Group defines default as a situation when the exposure meets one or more of the following criteria:

* [the borrower is more than 90 days past due on its contractual payments;
* the bank has sold the borrower’s debt or its portion at a loss due to credit deterioration;
* international rating agencies have classified the borrower in the default rating class;
* the borrower meets the unlikeliness-to-pay criteria listed below:
* the bank was forced to restructure the debt;
* the borrower is deceased;
* the borrower is insolvent;
* the borrower is in breach of financial covenant(s);
* it is becoming likely that the borrower will enter bankruptcy; and
* the loans were purchased or originated at a deep discount that reflects the incurred credit losses.]

For purposes of disclosure, the Group fully aligned the definition of default with the definition of credit-impaired assets. The default definition stated above is applied to all types of financial assets of the Group. *[Specify the definition of default as it is used for internal credit risk management purposes for any specific class of financial instruments, if different].*

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 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. *[Specify criteria used by the Group for each class of financial assets.]*

The assessment whether or not there has been a significant increase in credit risk (“SICR”)since initial recognitionis performed on an individual basis 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 either on a portfolio basis or an individual basis, depending on the existence of scoring models. The criteria used to identify an SICR are monitored and reviewed periodically for appropriateness by the Group’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 decided not to use the low credit risk assessment exemption for investment grade financial assets. Hence, even assets of an investment grade are assessed whether there has been a SICR.

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. *[specify separately in case the assessment of SICR differs for specialised lending or other financial assets]*

41 Financial Risk Management (Continued)

For interbank operations and bonds issued by banks:

* [30] days past due;
* award of risk grade “Special monitoring”;
* SICR based on relative threshold based either on external ratings or internal ratings. The following thresholds are used for external ratings: decrease of rating by [2] notches, for internal ratings by [5] notches, which corresponds to an approximate increase of PD by [3] times; refer to Note 4.

For loans issued to legal entities and bonds issued by corporate customers:

* [30] days past due;
* award of risk grade “Special monitoring”;
* SICR based on relative threshold based either on external ratings or internal ratings. The following thresholds are used for external ratings: decrease of rating by [2] notches, for internal ratings by [5] notches, which corresponds to approximate increase of PD by [3] times; refer to Note 4;
* inclusion of loan into a watch list according to the internal credit risk monitoring process.

For loans to Individuals:

* [30] days past due;
* [Relative threshold defined on the basis of a portfolio for products without existing scoring models: the Group regularly monitors segments with increased credit risk (regions of higher credit risk, failed products, products on which issuing was stopped) and considers such portfolios to have a SICR;] / [Relative threshold defined on individual basis for products with existing scoring models: increase of the remaining lifetime PD compared to remaining lifetime PD estimated as of the date of initial recognition by 2.5 times. In some circumstances, the Group uses a 12-month PD instead of a lifetime PD for calculating this ratio, if the effect of using 12-month PD is not materially different.]

The level of ECL that is recognised in these consolidated 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.

41 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. [Specify the process for how the Group monitors SICR indicators].

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 has three approaches for ECL measurement: (i) assessment on an individual basis; (ii) assessment on a portfolio basis: internal ratings are estimated on an individual basis but the same credit risk parameters (e.g. PD, LGD) will be applied during the process of ECL calculations for the same credit risk ratings and homogeneous segments of the loan portfolio; and (iii) assessment based on external ratings. The Group performs an assessment on an individual basis for the following types of loans: [loans with unique credit risk characteristics, individually significant loans, that is, individual exposures above EUR \_\_\_\_ thousand and credit-impaired loans above EUR \_\_\_\_ thousand.]. The Group performs an assessment on a portfolio basis for the following types of loans: [retail loans and loans issued to SMEs, when no borrower-specific information is available]. This approach stratifies the loan pool into homogeneous segments based on borrower-specific information, such as [delinquency status, the historical data on losses, location and other predictive information.] The Group also performs an assessment on a portfolio basis for [loans issued to corporate customers (standard lending, specialised lending, loans to leasing companies, etc.), interbank loans, retail loans and loans issued to SMEs.]

The Group performs assessments based on external ratings for [interbank loans, debt securities issued by banks and certain blue chip corporate customers, 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 Non-Performing Loan Management Department]. 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, credit risk rating, date of initial recognition, term to maturity, the quality of collateral and loan to value (LTV) ratio.]. The different segments also reflect differences in credit risk parameters such as PD and LGD. The appropriateness of groupigs is monitored and reviewed on a periodic basis by [the Risk Management Department].

41 Financial Risk Management (Continued)

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 [month / year] during the lifetime period for each individual exposure or collective segment. These three components are multiplied together and adjusted for the likelihood of survival (i.e. the exposure has been repaid or defaulted in an earlier month). This effectively calculates an ECL for each future period, that is then 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.

***The key principles of calculating the credit risk parameters.*** The EADs are determined based on the expected payment profile, that varies by product type. EAD is based on the contractual repayments owed by the borrower over a 12-month or lifetime basis for amortising products and bullet repayment loans. This will also be adjusted for any expected overpayments made by a borrower. Early repayment or refinancing assumptions are also incorporated into the calculation. For revolving products, 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. These assumptions vary by product type, current limit utilisation and other borrower-specific behavioural characteristics.

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 calculated based on the 12 months PDs over the life of the instrument. The Group uses different statistical approaches depending on the segment and product type to calculate lifetime PDs, such as the extrapolation of 12-month PDs based on migration matrices, developing lifetime PD curves based on the historical default data, hazard rate approach or other [Specify].

LGD represents the Group's expectation of the extent of loss on a defaulted exposure. LGD varies by the type of counterparty, type and seniority of the claim, and the availability of collateral or other credit support. The 12-month and lifetime LGDs are determined based on the factors that impact the expected recoveries after a default event. The approach to LGD measurement can be divided into three possible approaches:

* measurement of LGD based on the specific characteristics of the collateral;
* calculation of LGD on a portfolio basis based on recovery statistics; or
* individually defined LGD depending on different factors and scenarios.

The Group calculates LGD based on specific characteristics of the collateral, such as projected collateral values, historical discounts on sales and other factors for loans secured by real estate, cash and liquid securities. LGD is calculated on a collective basis based on the latest available recovery statistics for the remainder of the corporate loan portfolio and for retail secured and unsecured products.

***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 (“*E*”). 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 and blue chip corporate bonds exposures.

41 Financial Risk Management (Continued)

***Forward-looking information incorporated in the ECL models.***The assessment of SICR and the calculation of ECLs both incorporate unbiased and supportable forward-looking information. The Group identified certain key economic variables that correlate with developments in credit risk and ECLs. Forecasts of economic variables (the "base economic scenario") are provided by the Group's and provide the best estimate of the expected macro-economic development over the next [five] years. After [five] years, a mean reversion approach is used, which means that economic variables tend to revert to either a long run average rate (e.g. for unemployment) or a long run average growth rate (e.g. GDP). The impact of the relevant economic variables on the PD, EAD and LGD has been determined by performing statistical regression analysis to understand the impact that the changes in these variables historically had on the default rates and on the components of LGD and EAD.

In addition to the base economic scenario, the Group's [Risk Department] also provides other possible scenarios along with scenario weightings. The number of other scenarios used is set based on the analysis of each major product type to ensure that non-linearities are captured. The number of scenarios and their attributes are reassessed at each reporting date. The scenario weightings are determined by a combination of statistical analysis and expert credit judgement, taking into account the range of possible outcomes of which each chosen scenario is representative. The assessment of SICR is performed using the Lifetime PD under each of the bases and the other scenarios, multiplied by the associated scenario weighting, along with qualitative and backstop indicators. This determines whether the whole financial instrument is in Stage 1, Stage 2, or Stage 3 and hence whether a 12-month or lifetime ECL should be recorded. Following this assessment, the Group measures ECL as either a probability-weighted 12 month ECL (Stage 1), or a probability weighted lifetime ECL (Stages 2 and 3). These probability-weighted ECLs are determined by running each scenario through the relevant ECL model and multiplying it by the appropriate scenario weighting (as opposed to weighting the inputs).

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 Group considers these forecasts to represent its best estimate of the possible outcomes and has analysed the non-linearities and asymmetries within the Group's different portfolios to establish that the chosen scenarios are appropriately representative of the range of possible scenarios.

*[Add information about specific forward-looking information and significant period-end assumptions used for the ECL estimate.]*

The Group regularly reviews its methodology and assumptions to reduce any difference between the estimates and the actual loss of credit. Such backtesting is performed at least once a year.

The results of backtesting the ECL measurement methodology are communicated to Group Management and further steps for tuning models and assumptions are defined after discussions between authorised persons.

***[Purchased financial guarantees.*** The accounting for purchased financial guarantees, where the Group is the beneficiary and is compensated for credit losses incurred on its debt instruments, depends on whether the guarantees are both (i) in substance integral to the terms and conditions of the guaranteed loans and (ii) not recognised separately.

If the financial guarantee is both integral to the guaranteed loan and not recognised separately, fees paid for the guarantee are an integral part of the loan’s effective interest rate as transaction costs, unless the loan is measured at FVTPL. If the guaranteed loans are measured at amortised cost, the ability to recover cash flows from financial guarantee is considered in assessing whether significant increase in credit risk occurred, however, the expected cash flows from the financial guarantee are included in the measurement of ECL of the guaranteed loan.

41 Financial Risk Management (Continued)

The financial guarantee is recognised as a separate asset if it is not integral to the terms and conditions of any particular loan or group of loans. Since the financial guarantee is recognised separately, it is not included in the measurement of ECL of the guaranteed loan or loans. The Group measures the asset recognised for the financial guarantee at the higher of (i) the ECL allowance for related loans and (ii) its cost less cumulative amortisation recognised to allocate the cost of the guarantee over the shorter of (a) the life of the guarantee and (b) expected life of the guaranteed loan or loans. The asset is recognised provided it is virtually certain that the guarantee will reimburse the entity for a loss that it incurs if the borrower fails to pay.]

***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.

***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.

*[Disclose here detailed processes for management of currency risks. Processes need to be disclosed in addition to objectives and policies for managing the currency risk.]*

The table below summarises the Group’s exposure to foreign currency exchange rate risk at the end of the reporting period:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **At 31 December 2024** | | | | **At 31 December 2023** | | | |
| *In thousands of EUR* | **Monetary financial assets** | **Monetary financial liabilities** | **Deri-vatives** | **Net position** | **Monetary financial assets** | **Monetary financial liabilities** | **Deri-vatives** | **Net position** |
|  |  |  |  |  |  |  |  |  |
| Czech Koruna (CZK) |  |  |  |  |  |  |  |  |
| US Dollars (USD) |  |  |  |  |  |  |  |  |
| Polish Zloty (PLN) |  |  |  |  |  |  |  |  |
| Pound Sterling (GBP) |  |  |  |  |  |  |  |  |
| Euro (EUR) |  |  |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

[Derivatives presented above are monetary financial assets or monetary financial liabilities, but are presented separately in order to show the Group’s gross exposure.]

41 Financial Risk Management (Continued)

Amounts disclosed in respect of derivatives represent the fair value, at the end of the reporting period, of the respective currency that the Group agreed to buy (positive amount) or sell (negative amount) before netting of positions and payments with the counterparty. The amounts by currency are presented gross as stated in Note 48. The net total represents the fair value of the currency derivatives. The above analysis includes only monetary assets and liabilities. Investments in equities and non-monetary assets are not considered to give rise to any material currency risk.

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 2024** | | **At 31 December 2023** | |
| *In thousands of EUR* | **Impact on profit or loss** | **Impact on equity** | **Impact on profit or loss** | **Impact on equity** |
|  |  |  |  |  |
| USD strengthening by 20% (2023: strengthening by [20]%) |  |  |  |  |
| USD weakening by 20% (2023: weakening by [20]%) |  |  |  |  |
| CZK strengthening by 20% (2023: strengthening by [20]%) |  |  |  |  |
| CZK weakening by 20% (2023: weakening by [20]%) |  |  |  |  |
| EUR strengthening by \_\_% (2023: strengthening by [\_\_]%) |  |  |  |  |
| EUR weakening by \_\_% (2023: weakening by [\_\_]%) |  |  |  |  |
| Other strengthening by 20% (2023: strengthening by [30]%) |  |  |  |  |
| Other weakening by 20% (2023: weakening by [30]%) |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Total** |  |  |  |  |
|  |  |  |  |  |

41 Financial Risk Management (Continued)

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 average exposure to currency risk during the year, with all other variables held constant:]

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Average exposure during 2024** | | **Average exposure during 2023** | |
| *In thousands of EUR* | **Impact on profit or loss** | **Impact on equity** | **Impact on profit or loss** | **Impact on equity** |
|  |  |  |  |  |
| USD strengthening by 20% (2023: by [20]%) |  |  |  |  |
| USD weakening by 20% (2023: by [20]%) |  |  |  |  |
| EUR strengthening by 20% (2023: by [20]%) |  |  |  |  |
| EUR weakening by 20% (2023: by [30]%) |  |  |  |  |
| CZK strengthening by 20% (2023: by [\_\_]%) |  |  |  |  |
| CZK weakening by 20% (2023: by [\_\_]%) |  |  |  |  |
| Other strengthening by 20% (2023: by [20]%) |  |  |  |  |
| Other weakening by 20% (2023: by [20]%) |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Total** |  |  |  |  |
|  |  |  |  |  |

***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.

*[Disclose here detailed processes for management of interest risks. Processes need to be disclosed in addition to objectives and policies for managing the interest risks.]*

41 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 EUR* | **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 2024** |  |  |  |  |  |  |
| Total financial assets |  |  |  |  |  |  |
| Total financial liabilities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Net interest sensitivity gap at 31 December 2024** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **31 December 2023** |  |  |  |  |  |  |
| Total financial assets |  |  |  |  |  |  |
| Total financial liabilities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Net interest sensitivity gap at 31 December 2023** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

All of the Group’s debt instruments reprice within 5 years [except fixed interest rate bonds of EUR \_\_\_\_ thousand, which mature in \_\_\_\_ ] (2023: all reprice within 5 years [except fixed interest rate bonds of EUR \_\_\_\_ thousand, which mature in \_\_\_\_ ]).

At 31 December 2024, if interest rates at that date had been 200 basis points lower (2023: [200] basis points lower) with all other variables held constant, profit for the year would have been EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) higher, mainly as a result of lower interest expense on variable interest liabilities [and higher fair value of debt trading and other securities at fair value through profit or loss]. Other components of equity would have been EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) higher, [mainly] as a result of an increase in the fair value of fixed rate financial assets at fair value through other comprehensive income. *[Disclose also assumptions made in calculating the sensitivities.]*

If interest rates had been 200 basis points higher (2023: [200] basis points higher), with all other variables held constant, profit would have been EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) lower, mainly as a result of higher interest expense on variable interest liabilities [and lower fair value of debt trading and other securities at fair value through profit or loss]. Other components of equity would have been EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) lower, [mainly] as a result of a decrease in the fair value of fixed rate financial assets at far value through other comprehensive income. *[Disclose also assumptions made in calculating the sensitivities.]*

[The Group’s exposure to interest rate risk at the end of the reporting period is not representative of the typical exposure during the year. For the average exposure during 2024, if interest rates had been 200 basis points lower (2023: [200] basis points lower) with all other variables held constant, profit for the year would have been EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) higher, [mainly] as a result of lower interest expense on variable interest liabilities [and higher fair value of debt trading and other securities at fair value through profit or loss]. Other components of equity would have been EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) higher, [mainly] as a result of an increase in the fair value of fixed rate financial assets at fair value through other comprehensive income.

41 Financial Risk Management (Continued)

For the average exposure during 2024, if interest rates had been 200 basis points higher (2023: [200] basis points higher), with all other variables held constant, profit would have been EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) lower, [mainly] as a result of higher interest expense on variable interest liabilities [and lower fair value of debt trading and other securities at fair value through profit or loss]. Other components of equity would have been EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) lower, [mainly] as a result of a decrease in the fair value of fixed rate financial assets at fair value through other comprehensive income.]

The Group monitors interest rates for its financial instruments. The table below summarises 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:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In % p.a.* | **2024** | | | | **2023** | | | |
| **EUR** | **USD** | **CZK** | **Other** | **EUR** | **USD** | **CZK** | **Other** |
|  |  |  |  |  |  |  |  |  |
| **Assets** |  |  |  |  |  |  |  |  |
| Cash and cash equivalents |  |  |  |  |  |  |  |  |
| Investments in debt securities |  |  |  |  |  |  |  |  |
| Due from other banks |  |  |  |  |  |  |  |  |
| Loans and advances to customers |  |  |  |  |  |  |  |  |
| Repurchase receivables |  |  |  |  |  |  |  |  |
| Other financial assets |  |  |  |  |  |  |  |  |
| Financial assets included in non-current assets held for sale (or disposal groups) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Liabilities** |  |  |  |  |  |  |  |  |
| Due to other banks |  |  |  |  |  |  |  |  |
| Customer accounts |  |  |  |  |  |  |  |  |
| - current and settlement accounts |  |  |  |  |  |  |  |  |
| - term deposits |  |  |  |  |  |  |  |  |
| Debt securities in issue [Promissory notes issued] |  |  |  |  |  |  |  |  |
| Other borrowed funds |  |  |  |  |  |  |  |  |
| Other financial liabilities |  |  |  |  |  |  |  |  |
| Lease liabilities |  |  |  |  |  |  |  |  |
| Subordinated debt |  |  |  |  |  |  |  |  |
| Financial liabilities associated with non-current assets held for sale (or disposal groups) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

The sign “-“ in the table above means that the Group does not have the respective assets or liabilities in the corresponding currency.

***Other price risk.*** The Group has [limited] exposure to equity price risk. Transactions in equity products are monitored and authorised by the [Group treasury]. At 31 December 2024, if equity prices at that date had been [20% (2023: 25%)] lower (higher) with all other variables held constant, profit for the year would have been EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) lower (higher), and other components of equity would have been EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) lower (higher), mainly as a result of a decrease in the fair value of corporate shares at FVOCI (2023: corporate shares at FVOCI). *[Disclose also assumptions made in calculating the sensitivities.]*

41 Financial Risk Management (Continued)

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 [loss] 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 (2023: no material impact).

*[Please disclose information about any other price risk that the Group may be exposed to.]*

***Geographical risk concentrations.*** The geographical concentration of the Group’s financial assets and liabilities at 31 December 2024 is set out below:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **[Country]** | **Czech Republic** | **Poland** | **[Other EU]** | **[Other non-EU]** | **Total** |
|  |  |  |  |  |  |  |
| **Financial assets** |  |  |  |  |  |  |
| Cash and cash equivalents |  |  |  |  |  |  |
| Investments in debt securities |  |  |  |  |  |  |
| Investment in equity securities |  |  |  |  |  |  |
| Due from other banks |  |  |  |  |  |  |
| Loans and advances to customers |  |  |  |  |  |  |
| Repurchase receivables |  |  |  |  |  |  |
| Other financial assets |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total financial assets** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Financial liabilities** |  |  |  |  |  |  |
| Due to other banks |  |  |  |  |  |  |
| Customer accounts |  |  |  |  |  |  |
| Debt securities in issue [Promissory notes issued] |  |  |  |  |  |  |
| Other borrowed funds |  |  |  |  |  |  |
| Lease liabilities |  |  |  |  |  |  |
| Other financial liabilities |  |  |  |  |  |  |
| Subordinated debt |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total financial liabilities** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Net position in on-balance sheet financial instruments** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Credit related commitments** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

Assets, liabilities and credit related commitments have [generally] been based on the country in which the counterparty is located. Cash on hand [and precious metals] have been allocated based on the country in which they are physically held.

41 Financial Risk Management (Continued)

The geographical concentration of the Group’s financial assets and liabilities at 31 December 2023 is set out below:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **[Country]** | **Czech Republic** | **Poland** | **[Other EU]** | **[Other non-EU]** | **Total** | |
|  |  |  |  |  |  |  | |
| **Financial assets** |  |  |  |  |  |  | |
| Cash and cash equivalents |  |  |  |  |  |  | |
| Investments in debt securities |  |  |  |  |  |  | |
| Investment in equity securities |  |  |  |  |  |  | |
| Due from other banks |  |  |  |  |  |  | |
| Loans and advances to customers |  |  |  |  |  |  | |
| Repurchase receivables |  |  |  |  |  |  | |
| Other financial assets |  |  |  |  |  |  | |
|  |  |  |  |  |  |  | |
|  |  |  |  |  |  |  | |
| **Total financial assets** |  |  |  |  |  |  | |
|  |  |  |  |  |  |  | |
|  |  |  |  |  |  |  |
| **Financial liabilities** |  |  |  |  |  |  |
| Due to other banks |  |  |  |  |  |  |
| Customer accounts |  |  |  |  |  |  |
| Debt securities in issue [Promissory notes issued] |  |  |  |  |  |  |
| Other borrowed funds |  |  |  |  |  |  |
| Other financial liabilities |  |  |  |  |  |  |
| Subordinated debt |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total financial liabilities** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Net position in on-balance sheet financial instruments** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Credit related commitments** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

***Other risk concentrations.*** Management monitors and discloses concentrations of credit risk by obtaining reports listing exposures to borrowers with aggregated loan balances in excess of 10% of net assets. [Refer to Notes 8 and 9.] [The Group did not have any such significant risk concentrations at 31 December 2024 and 2023.]

***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. *[Needs tailoring to the Group’s circumstances.]*

The Group seeks to maintain a stable funding base primarily consisting of amounts due to other banks, corporate and retail customer deposits and [debt securities]. 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.

**41 Financial Risk Management (Continued)**

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 Bank calculates liquidity ratios on a daily basis in accordance with the requirements of Regulation (EU) No 575/2013 (Capital Requirements Regulation – CRR, as amended by Regulation (EU) No 2019/876 – CRR II). These ratios are:

* Liquidity Coverage Ratio (LCR), which compares available liquidity buffers to expected net cash outflows within the 30-day horizon under gravely stressed conditions. The ratio was \_\_\_\_ at 31 December 2024 (2023: \_\_\_\_\_);
* Net Stable Funding Ratio (NSFR), which is calculated as the ratio of available stable funding relative to the amount of required stable funding. The ratio was \_\_\_\_ at 31 December 2024 (2023: \_\_\_\_\_);

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. *[Tailor to the Group’s circumstances and the recent liquidity shortfalls in financial markets.]*

The table below shows liabilities at 31 December 2024 by their remaining contractual maturity. The amounts of liabilities disclosed in the maturity table are the contractual undiscounted cash flows, including gross 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. For the purposes of the maturity analysis, embedded derivatives are not separated from hybrid (combined) financial instruments.

The table below shows the maturity analysis of non-derivative financial assets at their carrying amounts and based on their contractual maturities, except for assets that are readily saleable if it should be necessary to meet cash outflows on financial liabilities. 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. Derivatives are presented based on their [contractual maturities].

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.

41 Financial Risk Management (Continued)

The maturity analysis of financial instruments at 31 December 2024 is as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |
| **Assets** |  |  |  |  |  |  |
| Cash and cash equivalents |  |  |  |  |  |  |
| Investments in debt securities |  |  |  |  |  |  |
| Investments in equity securities |  |  |  |  |  |  |
| Due from other banks |  |  |  |  |  |  |
| Loans and advances to customers |  |  |  |  |  |  |
| Repurchase receivables |  |  |  |  |  |  |
| *Gross settled swaps and forwards:* |  |  |  |  |  |  |
| - inflows |  |  |  |  |  |  |
| - outflows |  |  |  |  |  |  |
| Net settled derivatives |  |  |  |  |  |  |
| Other financial assets |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Liabilities** |  |  |  |  |  |  |
| Due to other banks |  |  |  |  |  |  |
| Customer accounts – individuals |  |  |  |  |  |  |
| Customer accounts – other |  |  |  |  |  |  |
| Debt securities in issue [Promissory notes issued] |  |  |  |  |  |  |
| Other borrowed funds |  |  |  |  |  |  |
| Lease liabilities |  |  |  |  |  |  |
| Subordinated debt |  |  |  |  |  |  |
| *Gross settled swaps and forwards:* |  |  |  |  |  |  |
| - inflows |  |  |  |  |  |  |
| - outflows |  |  |  |  |  |  |
| Net settled derivatives |  |  |  |  |  |  |
| Gross loan commitments |  |  |  |  |  |  |
| Financial guarantees |  |  |  |  |  |  |
| Other financial liabilities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total potential future payments for financial obligations** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Liquidity gap arising from financial instruments** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

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.

41 Financial Risk Management (Continued)

The maturity analysis of financial instruments at 31 December 2023 is as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **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** |
|  |  |  |  |  |  |  |
| **Assets** |  |  |  |  |  |  |
| Cash and cash equivalents |  |  |  |  |  |  |
| Investments in debt securities |  |  |  |  |  |  |
| Investments in equity securities |  |  |  |  |  |  |
| Due from other banks |  |  |  |  |  |  |
| Loans and advances to customers |  |  |  |  |  |  |
| Repurchase receivables |  |  |  |  |  |  |
| *Gross settled swaps and forwards:* |  |  |  |  |  |  |
| - inflows |  |  |  |  |  |  |
| - outflows |  |  |  |  |  |  |
| Net settled derivatives |  |  |  |  |  |  |
| Other financial assets |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Liabilities** |  |  |  |  |  |  |
| Due to other banks |  |  |  |  |  |  |
| Customer accounts – individuals |  |  |  |  |  |  |
| Customer accounts – other |  |  |  |  |  |  |
| Debt securities in issue [Promissory notes issued] |  |  |  |  |  |  |
| Other borrowed funds |  |  |  |  |  |  |
| Lease liabilities |  |  |  |  |  |  |
| Subordinated debt |  |  |  |  |  |  |
| *Gross settled swaps and forwards:* |  |  |  |  |  |  |
| - inflows |  |  |  |  |  |  |
| - outflows |  |  |  |  |  |  |
| Net settled derivatives |  |  |  |  |  |  |
| Gross loan commitments |  |  |  |  |  |  |
| Financial guarantees |  |  |  |  |  |  |
| Other financial liabilities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total potential future payments for financial obligations** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Liquidity gap arising from financial instruments** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

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, individuals have a right to withdraw their deposits prior to maturity in certain territories if they forfeit their right to accrued interest.

41 Financial Risk Management (Continued)

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:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **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 2024** |  |  |  |  |  |  |
| Financial assets |  |  |  |  |  |  |
| Financial liabilities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Net liquidity gap based on expected maturities** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **At 31 December 2023** |  |  |  |  |  |  |
| Financial assets |  |  |  |  |  |  |
| Financial liabilities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Net liquidity gap based on expected maturities** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

The entire portfolio of trading securities is classified within demand and less than one month based on management’s assessment of the portfolio’s realisability.

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 despite 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.

*[Liquidity position discussion should be tailored depending on the Group’s particular circumstances. ]*

***Effect of IBOR reform*.** Reform and replacement of various inter-bank offered rates (‘IBORs’) has become a priority for regulators. Many IBOR rates stopped being published on 31 December 2023, while certain USD LIBOR rates would stop being published by 30 June 2024.

The Group applied the practical expedients of Interest Rate Benchmark Reform – Phase 2 amendments to IFRS 9 to reflect changes to the basis for determining the contractual cash flows by adjusting the effective interest rate to [loans and advances to customers of EUR \_\_\_\_\_\_\_\_ thousand that were measured at amortised cost].

41 Financial Risk Management (Continued)

The table below discloses amounts of non-derivative financial assets and liabilities and derivative contracts at 31 December 2024 that would be transitioned to alternative interest rate benchmarks

| In thousands of EUR | USD LIBOR | EUR LIBOR | CHF LIBOR | […] | Total |
| --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |
| NON-DERIVATIVE FINANCIAL ASSETS |  |  |  |  |  |
| Due from other banks |  |  |  |  |  |
| Investments in debt securities |  |  |  |  |  |
| Loans and advances to customers |  |  |  |  |  |
| Repurchase receivables |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| TOTAL NON-DERIVATIVE FINANCIAL ASSETS |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| NON-DERIVATIVE FINANCIAL LIABILITIES |  |  |  |  |  |
| Due to other banks |  |  |  |  |  |
| Customer accounts |  |  |  |  |  |
| Debt securities in issue |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| TOTAL NON-DERIVATIVE FINANCIAL LIABILITIES |  |  |  |  |  |
| **DERIVATIVE FINANCIAL INSTRUMENTS** |  |  |  |  |  |
| Interest rate swaps: notional amounts |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **TOTAL DERIVATIVE FINANCIAL INSTRUMENTS** |  |  |  |  |  |
|  |  |  |  |  |  |

The Group is exposed to a risk that the liquidity of the above financial instruments would start to decrease, as the volume of operations with traditional IBOR-based financial instruments is shrinking. The Group is also exposed to a risk of the potential arbitrage differences between IBOR interest rates and the applicable alternative rates. [Please disclose any changes to the risk management policies and procedures due to the IBOR reform, or provide a reference to a note where such information is disclosed.]

The Group is working with its customers and other counterparties, such as international financial institutions to perform a transition of legacy IBOR-based financial instruments to alternative benchmark interest rates and develop new financial products for its customers. The Group is also enhancing its IT systems and internal processes to ensure smooth transition from IBOR to alternative benchmark interest rates. [Please provide additional details on the actions carried by the Group to organise the transition process.]

[Please note that if the Group is applying hedge accounting, and the hedge relationships are affected by IBOR reform, i.e. the Group is hedging IBOR-based interest rate risk, additional disclosures are required. Please refer to the IBOR reform global illustrative disclosures for a reference.]

# Management of Capital

The Group’s objectives when managing capital are (i) to comply with the capital requirements set by [Regulation (EU) No 575/2013 (Capital Requirements Regulation – CRR, as amended by Regulation (EU) No 2019/876 – CRR II),] and (ii) to safeguard the Group’s ability to continue as a going concern. Compliance with capital adequacy ratios set by the CRR is monitored monthly, with reports outlining their calculation reviewed and signed by the Bank’s Chief Executive Officer and Chief Accountant. Other objectives of capital management are evaluated [annually].

42 Management of Capital (Continued)

Under the current capital requirements set by the CRR, banks have to maintain a ratio of regulatory capital to risk weighted assets above a prescribed minimum level (Tier 1 ratio and Total capital ratio). Based on information provided internally to key management personnel, the amount of capital that the Group managed was EUR \_\_\_\_\_\_ thousand as of 31 December 2024 (2023: EUR \_\_\_\_\_ thousand), regulatory Tier 1 capital amounts to EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand), total regulatory capital amounts to EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) and the Group and the Bank have complied with all externally imposed capital requirements throughout 2024 and 2023. *[Disclose consequences of non-compliance with any externally imposed capital requirement. ]*

# 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 both internal [and external] professional advice, management is of the opinion that no material losses will be incurred in respect of claims, and accordingly no provision has been made in these [consolidated] financial statements.

[At 31 December 2024, the Group was engaged in litigation proceedings with \_\_\_\_\_\_ in relation to \_\_\_\_\_. No provision has been made as the Group’s management believes that it is not likely that any significant loss will eventuate.]

[At 31 December 2024, the Group was engaged in litigation proceedings with \_\_\_\_\_ in relation to \_\_\_\_\_. A provision of EUR \_\_\_\_\_ thousand has been made as professional advice has indicated that it is likely that a loss will eventuate. Refer to Note [25]. ]

***Tax contingencies.*** Tax [and customs] 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. Fiscal periods remain 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 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.]

Tax liabilities arising from controlled transactions are determined based on their actual transaction prices. It is possible, with the evolution of the interpretation of transfer pricing rules, that such transfer prices could be challenged. The impact of any such challenge cannot be reliably estimated; however, it may be significant to the financial position and/or the overall operations of the Group. The Management's best estimate of the exposure to transfer pricing is EUR \_\_\_\_ thousand (2023: EUR \_\_\_ thousand). In addition, alternative assumptions may be used for tax calculation purposes. Therefore, this amount should not be interpreted as the final assessment of future taxes payable if tax authorities challenge the transfer prices. The Management plans to defend vigorously the Group's transfer pricing positions.]

43 Contingencies and Commitments (Continued)

The Group includes companies incorporated outside of the [Country]. The tax liabilities of the Group are determined on the assumption that these companies are not subject to profits tax in the [Country], because they do not have a permanent establishment in the [Country]. This interpretation of relevant legislation may be challenged but the impact of any such challenge cannot be reliably estimated currently; however, it may be significant to the financial position and/or the overall operations of the Group.

As the tax legislation does not provide definitive guidance in certain areas, the Group adopts, from time to time, interpretations of such uncertain areas that reduce the overall tax rate of the Group. While management currently estimates that the tax positions and interpretations that it has taken can probably be sustained, there is a possible risk that outflow of resources will be required should such tax positions and interpretations be challenged by the tax authorities. The impact of any such challenge cannot be reliably estimated; however, it may be significant to the financial position and/or the overall operations of the Group.

In addition to the above matters, management estimates that the Group has other possible obligations from exposure to other than remote tax risks of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand)....in the range from EUR \_\_\_\_\_ thousand to EUR \_\_\_\_ thousand (2023: in the range from EUR \_\_\_\_\_ thousand to EUR \_\_\_\_ thousand)]. These exposures primarily relate to [Insert explanation of the specific tax matters]. These exposures are estimates that result from uncertainties in interpretation of applicable legislation and related documentation requirements. Management will vigorously defend the entity's positions and interpretations that were applied in determining taxes recognised in these financial statements if these are challenged by the authorities.

Included in the above disclosed amount of possible obligations for uncertain tax positions are EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) Included in the above disclosed range of possible obligations for uncertain tax positions are obligations of EUR \_\_\_\_\_ thousand to EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand to EUR \_\_\_\_ thousand)] for which the inspection rights of tax authorities have expired, but which may be challenged by regulatory bodies under certain circumstances. In management’s estimate, no losses are anticipated from these contingent liabilities.

***Capital expenditure commitments.*** At 31 December 2024, the Group has contractual capital expenditure commitments in respect of premises and equipment totalling EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand), and in respect of software and other intangible assets of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand).

[Contractual obligations to purchase, construct or develop investment properties totalled EUR \_\_\_\_\_ thousand at 31 December 2024 (2023: EUR \_\_\_\_ thousand). Contractual obligations for repairs, maintenance or enhancements of investment properties totalled EUR \_\_\_\_\_ thousand at 31 December 2024 (2023: EUR \_\_\_\_ thousand).]

The Group has already allocated the necessary resources in respect of these commitments. The Group believes that future net income and funding will be sufficient to cover this and any similar such commitments.

43 Contingencies and Commitments (Continued)

***Future cash outflows related to leases.*** Where the Group is a lessee, the future cash outflows, to which the Group is potentially exposed and that are not reflected in the lease liabilities relate mainly to:

1. Long-term leases of land with rent payments based on cadastral values; the rent expense recorded for such leases in 2024 is EUR\_\_\_\_\_ thousand and the remaining lease terms are between \_\_\_\_ and \_\_\_\_\_ years (2023: the rent expense was EUR\_\_\_\_\_ thousand and the remaining lease terms were between \_\_\_\_ and \_\_\_\_\_ years).
2. Leases of buildings with rent annually indexed by the Consumer Price Index; the lease liability related to such leases at 31 December 2024 is EUR \_\_\_\_\_\_ thousand and the lease terms are between \_\_\_\_ and \_\_\_\_ years (2023: the lease liability was EUR\_\_\_\_\_ thousand and the lease terms were between \_\_\_\_ and \_\_\_\_\_ years).
3. leases of buildings with extension options, which the Group is not reasonably certain to exercise, however this assessment may change in the future depending on circumstances; the lease liability related to such leases at 31 December 2024 is EUR\_\_\_\_\_\_ thousand and the extension options that are currently not included in the lease term range from \_\_\_\_ to \_\_\_\_ years (2023: the lease liability was EUR\_\_\_\_\_ thousand and the extension options that were not included in the lease term ranged between \_\_\_\_ and \_\_\_\_\_ years).

*[Disclose also a general description of the leasing arrangements. This would include: (i) the basis on which fully variable rent payments are determined; (ii) the existence and terms of renewal or purchase options and escalation clauses; and (iii) restrictions imposed by lease arrangements, such as those concerning dividends, additional debt and further leasing.]*

*[Disclosure of details of significant operating leases is required.] [For capital commitments and operating lease commitments review implications of IFRS 9, specifically if the commitments are linked to a currency other than the relevant Group entity’s functional currency.]*

***Compliance with covenants.*** The Group is subject to certain covenants primarily relating to its [borrowings]. Non-compliance with such covenants may result in negative consequences for the Group including [growth in the cost of borrowings and declaration of default]. Management believes that the Group was in compliance with covenants at 31 December 2024 and 31 December 2023.Tailor accordingly if breach of covenant occurred.

[The Group and the Bank are 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 CRR. The Group complied with these loan covenants.]

[The composition of the Group’s capital calculated in accordance with the CRR is as follows:]

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| **Tier 1 capital** |  |  |
| Share capital |  |  |
| Cumulative translation reserve |  |  |
| Retained earnings |  |  |
| Non-controlling interest  Other *(specify)* |  |  |
| **Total tier 1 capital** |  |  |
|  |  |  |
| **Tier 2 capital** |  |  |
| Revaluation reserves |  |  |
| Subordinated debt  Other *(specify)* |  |  |
| **Total tier 2 capital** |  |  |
|  |  |  |
|  |  |  |
| **Total capital** |  |  |
|  |  |  |

43 Contingencies and Commitments (Continued)

***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. Note 41 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.

***[Loan commitments.*** Loan 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, commercial or legal obligation. Where the performance guarantee provides the Group with contractual indemnification rights to recover any payments made to the guarantee holder from the applicant and such rights are covered by collateral, they are treated as a loan commitment provided to the applicant, if the bank concludes that there is no event with commercial substance that could cause the bank to incur an overall loss on the guarantee arrangement. Such 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 amount of the loss allowance determined based on the expected credit loss model.]

43 Contingencies and Commitments (Continued)

Outstanding credit related commitments are as follows:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **2024** | **2023** |
|  |  |  |  |
| Commitments to extend credit that are irrevocable or are revocable only in response to a material adverse change |  |  |  |
| Undrawn credit lines that are irrevocable or are revocable only in response to a material adverse change |  |  |  |
| Export letters of credit |  |  |  |
| Import letters of credit | 22 |  |  |
|  |  |  |  |
|  |  |  |  |
| Total loan commitments |  |  |  |
|  |  |  |  |
|  |  |  |  |
| Financial guarantees issued |  |  |  |
|  |  |  |  |
| Less: Provision for financial guarantees | 26 |  |  |
| Less: Provision for loan commitments | 26 |  |  |
| Less: Commitment collateralised by cash deposits |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total credit related commitments, net of provision and cash covered exposures** |  |  |  |
|  |  |  |  |

43 Contingencies and Commitments (Continued)

An analysis of credit related commitments by credit quality based on credit risk grades at 31 December 2024 is as follows.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Stage 1**  **(12-months ECL)** | **Stage 2**  **(lifetime ECL for SICR)** | **Stage 3**  **(lifetime ECL for credit im-paired)** | **Total** |
|  |  |  |  |  |
| **Issued financial guarantees** |  |  |  |  |
|  |  |  |  |  |
| - Excellent |  |  |  |  |
| - Good |  |  |  |  |
| - Satisfactory |  |  |  |  |
| - Special monitoring |  |  |  |  |
| - Default |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Unrecognised gross amount** |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Provision for financial guarantees** |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Loan commitments** |  |  |  |  |
|  |  |  |  |  |
| - Excellent |  |  |  |  |
| - Good |  |  |  |  |
| - Satisfactory |  |  |  |  |
| - Special monitoring |  |  |  |  |
| - Default |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Unrecognised gross amount** |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Provision for loan commitments** |  |  |  |  |
|  |  |  |  |  |

Refer to Note 41 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 EUR \_\_\_\_\_ thousand at 31 December 2024 (2023: EUR \_\_\_\_ 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:

43 Contingencies and Commitments (Continued)

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **2024** | **2023** |
|  |  |  |  |
| [Product/Exposure 1] |  |  |  |
| [Product/Exposure 2] |  |  |  |
| [Product/Exposure 3] |  |  |  |
| … |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Total guaranteed amounts** |  |  |  |
|  |  |  |  |

Movements in provisions for performance guarantees are as follows:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Note** | **2024** | **2023** |
|  |  |  |  |
| **Carrying amount at 1 January** |  |  |  |
|  |  |  |  |
| Initial recognition of issued performance guarantees |  |  |  |
| Losses charged to profit or loss | 35 |  |  |
| Additions through business combinations | 52 |  |  |
| Utilisation of provision |  |  |  |
| Unwinding of the present value discount and effect of changes in discount rates |  |  |  |
| Unused amounts reversed | 35 |  |  |
| [Effect of translation to presentation currency] |  |  |  |
| Other |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **Carrying amount at 31 December** |  |  |  |
|  |  |  |  |

***Assets pledged and restricted.*** The Group had assets pledged as collateral with the following carrying value:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **Notes** | **31 December 2024** | | **31 December 2023** | |
| *In thousands of EUR* | **Asset pledged** | **Related liability** | **Asset pledged** | **Related liability** |
|  |  |  |  |  |  |
| Investments in debt securities at AC | 9, [23](#_heading=h.2p2csry) |  |  |  |  |
| Investments in debt securities at FVOCI | 9, [23](#_heading=h.2p2csry) |  |  |  |  |
| Gross receivables under currency swaps | 15, [23](#_heading=h.2p2csry) |  |  |  |  |
| Investments in equity securities at FVTPL | 10, [23](#_heading=h.2p2csry) |  |  |  |  |
| Investments in equity securities at FVOCI | 10, [23](#_heading=h.2p2csry) |  |  |  |  |
| Repurchase receivables | 12, [23](#_heading=h.2p2csry) |  |  |  |  |
| Investment properties | 13 |  |  |  |  |
| Premises and equipment | [18](#_heading=h.1pxezwc), [23](#_heading=h.2p2csry) |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total** |  |  |  |  |  |
|  |  |  |  |  |  |

At 31 December 2024, due from other banks balances of EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) are placed as a cover for letters of credit and international payment cards transactions. [In addition, mandatory cash balances with the NBC of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) represent mandatory reserve deposits which are not available to finance the Bank's day to day operations.]

# Offsetting Financial Assets and Financial Liabilities

Financial instruments subject to offsetting, enforceable master netting and similar arrangements are as follows at 31 December 2024:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Gross amounts before offsetting in the statement of financial position**  **(a)** | **Gross amounts set off**  **in the statement of financial position**  **(b)** | **Net amount after offsetting in the statement of financial position**  **(c) = (a) ‒ (b)** | **Amounts subject to master netting and similar arrangements not set off in the statement of financial position** | | **Net amount of exposure**  **(c) ‒ (d) ‒ (e)** |
| *In thousands of EUR* | **Financial instru-ments**  **(d)** | **Cash collateral received**  **(e)** |
|  |  |  |  |  |  |  |
| **ASSETS** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Due from other banks*** |  |  |  |  |  |  |
| - Short-term placements with other banks with original maturities of more than three months |  |  |  |  |  |  |
| - Reverse sale and repurchase agreements with other banks with original maturities of more than three months |  |  |  |  |  |  |
| ***Loans and advances to customers*** |  |  |  |  |  |  |
| - Corporate loans |  |  |  |  |  |  |
| - Reverse sale and repurchase agreements |  |  |  |  |  |  |
| ***Other financial assets:*** |  |  |  |  |  |  |
| - Trade receivables |  |  |  |  |  |  |
| - Credit and debit cards receivables |  |  |  |  |  |  |
| - Settlements on conversion operations |  |  |  |  |  |  |
| - Foreign exchange forward contracts |  |  |  |  |  |  |
| - Precious metals forward contracts |  |  |  |  |  |  |
| - Other financial derivatives |  |  |  |  |  |  |
| - Restricted cash |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **TOTAL ASSETS SUBJECT TO OFFSETTING, MASTER NETTING AND SIMILAR ARRANGEMENT** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **LIABILITIES** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Financial derivatives |  |  |  |  |  |  |
| Sale and repurchase agreements |  |  |  |  |  |  |
| Trade payables |  |  |  |  |  |  |
| Short sale of securities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **TOTAL LIABILITIES SUBJECT TO OFFSETTING, MASTER NETTING AND SIMILAR ARRANGEMENT** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

44 Offsetting Financial Assets and Financial Liabilities (Continued)

Financial instruments subject to offsetting, enforceable master netting and similar arrangements are as follows at 31 December 2023:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Gross amounts before offsetting in the statement of financial position**  **(a)** | **Gross amounts set off**  **in the statement of financial position**  **(b)** | **Net amount after offsetting in the statement of financial position**  **(c) = (a) ‒ (b)** | **Amounts subject to master netting and similar arrangements not set off in the statement of financial position** | | **Net amount of exposure**  **(c) ‒ (d) ‒ (e)** |
| *In thousands of EUR* | **Financial instru-ments**  **(d)** | **Cash collateral received**  **(e)** |
|  |  |  |  |  |  |  |
| **ASSETS** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Due from other banks*** |  |  |  |  |  |  |
| - Short-term placements with other banks with original maturities of more than three months |  |  |  |  |  |  |
| - Reverse sale and repurchase agreements with other banks with original maturities of more than three months |  |  |  |  |  |  |
| ***Loans and advances to customers*** |  |  |  |  |  |  |
| - Corporate loans |  |  |  |  |  |  |
| - Reverse sale and repurchase agreements |  |  |  |  |  |  |
| ***Other financial assets:*** |  |  |  |  |  |  |
| - Trade receivables |  |  |  |  |  |  |
| - Credit and debit cards receivables |  |  |  |  |  |  |
| - Settlements on conversion operations |  |  |  |  |  |  |
| - Foreign exchange forward contracts |  |  |  |  |  |  |
| - Precious metals forward contracts |  |  |  |  |  |  |
| - Other financial derivatives |  |  |  |  |  |  |
| - Restricted cash |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **TOTAL ASSETS SUBJECT TO OFFSETTING, MASTER NETTING AND SIMILAR ARRANGEMENT** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **LIABILITIES** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Financial derivatives |  |  |  |  |  |  |
| Sale and repurchase agreements |  |  |  |  |  |  |
| Trade payables |  |  |  |  |  |  |
| Short sale of securities |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **TOTAL LIABILITIES SUBJECT TO OFFSETTING, MASTER NETTING AND SIMILAR ARRANGEMENT** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

44 Offsetting Financial Assets and Financial Liabilities (Continued)

Financial assets and liabilities are offset and the net amount reported in the consolidated 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.

The amount set off in the statement of financial position reported in column (b) is the lower of (i) the gross amount before offsetting reported in column (a) and (ii) the amount of the related instrument that is eligible for offsetting. Similarly, the amounts in columns (d) and (e) are limited to the exposure reported in column (c) for each individual instrument in order not to understate the ultimate net exposure.

The Group has master netting arrangements with counterparty banks, which are enforceable in case of default. In addition, applicable legislation allows an entity to unilaterally set off trade receivables and payables that are due for payment, denominated in the same currency and outstanding with the same counterparty. These fall in the scope of the disclosure as they were set off in the statement of financial position. The Group also made margin deposits with [clearing house counterparty] as collateral for its outstanding derivative positions. The counterparty may set off the Group’s liabilities with the margin deposit in case of default.

The disclosure does not apply to loans and advances to customers and related customer deposits unless they are set off in the statement of financial position.

*[Disclose description of the rights of set-off associated with the entity’s recognised financial assets and recognised financial liabilities subject to enforceable master netting arrangements and similar agreements that are disclosed in accordance with paragraph 13C(d) of IFRS 7, including the nature of those rights.]*

# Non-Controlling Interest

The following table provides information about each subsidiary that has non-controlling interest that is material to the Group:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Place of business (and country of incorpo-ration if different)** | **Proportion of non-controlling interest** | **Proportion of non-controlling interest’s voting rights held** | **Profit or loss attribu-table to non-controlling interest** | **Accumu-lated non-controlling interest in the subsidiary** | **Dividends paid to non-controlling interest during the year** |
|  |  |  |  |  |  |  |
| **Year ended 31 December 2024** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| [NAME OF SUBSIDIARY 1] |  |  |  |  |  |  |
| [NAME OF SUBSIDIARY 2] |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Year ended 31 December 2023** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| [NAME OF SUBSIDIARY 1] |  |  |  |  |  |  |
| [NAME OF SUBSIDIARY 2] |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **TOTAL** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

45 Non-Controlling Interest (Continued)

The summarised financial information of these subsidiaries was as follows:

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Current assets** | **Non-current assets** | **Current liabilities** | **Non-current liabilities** | **Revenue** | **Profit/**  **(loss)** | **Total compre-hensive income** | **Cash**  **flows** |
|  |  |  |  |  |  |  |  |  |
| **Year ended 31 December 2024** |  |  |  |  |  |  |  |  |
| [SUB 1] |  |  |  |  |  |  |  |  |
| [SUB 2] |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Year ended 31 December 2023** |  |  |  |  |  |  |  |  |
| [SUB 1] |  |  |  |  |  |  |  |  |
| [SUB 2] |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Total** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

[Subsidiary 1] has outstanding borrowing from a third party bank that includes a clause restricting payment of dividends to the parent without the lender’s approval. *[Disclose significant restrictions (eg statutory, contractual and regulatory restrictions) on ability to access or use the assets and settle the liabilities of the group.]*

Holders of the non-controlling interest in [Subsidiary 1] approve disposals of assets above [5%] of the subsidiary’s total assets and have a right to veto any transaction with related parties with a financial effect above EUR \_\_\_\_ thousand. These restrictions apply to all assets of the subsidiary as disclosed above. *[Disclose the nature and extent to which protective rights of non-controlling interests can significantly restrict the entity’s ability to access or use the assets and settle the liabilities of the group. Disclose the carrying amounts in the consolidated financial statements of the assets and liabilities to which those restrictions apply.]*

***Purchases and sales of non-controlling interests.*** The Group applies the economic entity model to account for transactions with owners of non-controlling interest. Any difference between the purchase consideration and the carrying amount of non-controlling interest acquired is recorded as a capital transaction directly in equity. The Group recognises the difference between sales consideration and carrying amount of non-controlling interest sold as a capital transaction in the statement of changes in equity.

# Interests in Structured Entities

***(a) Consolidated structured entities***

[The Group holds less than 50% of voting rights in a fully consolidated subsidiary \_\_\_\_\_. The Group has the power and exposure to variable returns of this subsidiary through contractual arrangements with \_\_\_\_\_. ] [The Group issued bonds though a consolidated structured entity incorporated in the [country]. This entity was consolidated as it was specifically set up for the purposes of the Group, and the Group has exposure to substantially all risks and rewards through outstanding guarantees of the entity’s obligations. The Group guarantees all obligations of this entity represented by the bonds issued of EUR \_\_\_\_\_ thousand.] *[Disclose significant judgements and assumptions made in determining that (a) The Group controls another entity even though it holds less than half of the voting rights of the other entity; and (b) it is an agent or a principal (see paragraphs B58–B72 of IFRS 10).] [Disclose the terms of any contractual arrangements that could require the parent or its subsidiaries to provide financial support to a consolidated structured entity. This applies also to securitisation transactions. Also disclose details of any support provided during the year and an intention to provide support – see IFRS 12.15-16]*

46 Interests in Structured Entities (Continued)

***(b) Unconsolidated structured entities***

[The Group holds more than 50% of voting rights in \_\_\_\_\_ but does not have the power over this entity due to contractual arrangements with \_\_\_\_\_, which specify that \_\_\_\_\_. Consequently \_\_\_\_\_ [entity] is not consolidated.] *[Disclose significant judgements and assumptions made in determining that: (a) the Group does not control another entity even though it holds more than half of the voting rights of the other entity; (b) it is an agent or a principal (see paragraphs B58–B72 of IFRS 10); (c) it does not have significant influence even though it holds 20 per cent or more of the voting rights of another entity and (d) it has significant influence even though it holds less than 20 per cent of the voting rights of another entity.]*

Information about unconsolidated structured entities is as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Year ended 31 December 2024** | | | **At 31 December 2023** | | |
| *In thousands of EUR* | **Income from the structured entity for the year** | **Carrying amount of assets transferred to the structured entity during the year** | **Support provided to the structured entity during the year** | **Carrying amount of assets recognised for expo-sure to the structured entity** | **Carrying amount of liabilities recognised for expo-sure to the structured entity** | **Maximum exposure to loss from interest in structured entity** |
|  |  |  |  |  |  |  |
| [Leasing entity] |  |  |  |  |  |  |
| [Securitisation vehicle] |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **TOTAL** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

*[Disclose narrative text to cover the following information where material:*

* the nature, purpose, size and activities of the unconsolidated structured entity;
* how the unconsolidated structured entity is financed;
* how it has determined which structured entities the Group has sponsored;
* a description of the types of income from structured entities presented above;
* the line items in the statement of financial position in which the assets and liabilities relating to unconsolidated structured entity are recognised;
* description how the maximum exposure to loss is determined;
* the type of support provided to structured entity, including situations in which the entity assisted the structured entity in obtaining financial support; and the reasons for providing the support;
* any current intentions to provide financial or other support to an unconsolidated structured entity, including intentions to assist the structured entity in obtaining financial support;
* the terms of an arrangement that could require the entity to provide financial support to an unconsolidated structured entity (eg liquidity arrangements or credit rating triggers associated with obligations to purchase assets of the structured entity or provide financial support), including: (i) description of events or circumstances that could expose the reporting entity to a loss, (ii) whether there are any terms that would limit the obligation, (ii) whether there are any other parties that provide financial support and, if so, how the reporting entity’s obligation ranks with those of other parties.
* losses incurred by the entity during the reporting period relating to its interests in unconsolidated structured entities.
* the types of income the entity received during the reporting period from its interests in unconsolidated structured entities.

46 Interests in Structured Entities (Continued)

* whether the entity is required to absorb losses of an unconsolidated structured entity before other parties, the maximum limit of such losses for the entity, and (if relevant) the ranking and amounts of potential losses borne by parties whose interests rank lower than the entity’s interest in the unconsolidated structured entity.
* information about any liquidity arrangements, guarantees or other commitments with third parties that may affect the fair value or risk of the entity’s interests in unconsolidated structured entities.
* any difficulties an unconsolidated structured entity has experienced in financing its activities during the reporting period.
* in relation to the funding of an unconsolidated structured entity, the forms of funding (eg commercial paper or medium-term notes) and their weighted-average life. That information might include maturity analyses of the assets and funding of an unconsolidated structured entity if the structured entity has longer-term assets funded by shorter-term funding.]

# Transfers of Financial Assets

***[***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.

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 (eg profit share or equity-based return), significant change in interest rate, 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.]

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. The Group also assesses whether the new loan or debt instrument meets the SPPI criterion. 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 assets 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, 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.

Payment holidays granted by the Group in response to [*specify as appropriate, e.g. current high interest environment*] are treated as contractual modifications of the respective loans and advances. Their impact on the gross carrying amount (modification loss) is presented in profit or loss within *[specify the line item].*

***(a) Transfers that did not qualify for derecognition of the financial asset in its entirety.***

The Group transferred financial assets in transactions that did not qualify for derecognition in the current and prior periods.

47 Transfers of Financial Assets (Continued)

***Disposal of loans.*** At 31 December 2024, the Group had [corporate] loans of EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) that were transferred to [a related party under common control]. TheGroupguaranteed repayment of the nominal value of the transferred loans in case of their default after 360 days. The Group is not exposed to late payment risk as it did not guarantee payment of accrued interest. As the transfer did not meet criteria for derecognition of the loans, at 31 December 2024 the sale proceeds of EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) were recognised as borrowings and are presented in Note 24. *[Note: disclose by class of financial assets the nature of the transferred assets, nature of retained risks and rewards and description of the relationship with the related liabilities including any restrictions on the use of the transferred assets.]*

***Securitisation transaction.*** In addition, at 31 December 2024 the Group transferred [corporate] loans of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) to a securitisation structured entity that the Group consolidates because it acquired all of its subordinated borrowings amounting to EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand). Refer to Note 24 for carrying value of the related borrowings that are represented by senior notes issued by the securitisation special purpose entity to third party investors.

***Sale and repurchase transactions.*** At 31December2024, theGroup has trading securities represented by [[Country] government bonds] of EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) and FVOCI securities represented by [corporate bonds] of EUR \_\_\_ thousand (2023: EUR \_\_\_\_ thousand) that are subject to obligation to repurchase the securities for a fixed pre-determined price. Refer to Notes 21 and 24 for the carrying value of obligations from these sale and repurchase transactions.

***Securities lending transactions.*** At 31 December 2024,theGroup had trading securities represented by [[Country] government bonds] of EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) that were provided to counterparties in a securities lending transaction in exchange for a fee.

47 Transfers of Financial Assets (Continued)

The following schedule summarises transfers where the entity continues to recognise all of the transferred financial assets. The analysis is provided by class of financial assets.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **Notes** | **31 December 2024** | | **31 December 2023** | |
| *In thousands of EUR* | **Carrying amount of the assets at year end** | **Carrying amount of the associated liabilities** | **Carrying amount of the assets at year end** | **Carrying amount of the associated liabilities** |
|  |  |  |  |  |  |
| Corporate loans |  |  |  |  |  |
| Loans to individuals |  |  |  |  |  |
| Debt securities mandatorily measured at FVTPL |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |
| - Corporate bonds  - Investments in mutual funds |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |
|  |  |  |  |  |  |
| Debt securities designated as at FVTPL at initial recognition |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |
|  |  |  |  |  |  |
| Debt securities at FVOCI |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |
|  |  |  |  |  |  |
| Debt securities at AC |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |
|  |  |  |  |  |  |
| Equity securities mandatorily measured at FVTPL |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |
| - ADRs |  |  |  |  |  |
| - GDRs |  |  |  |  |  |
|  |  |  |  |  |  |
| Equity securities at FVOCI |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |
| - ADRs |  |  |  |  |  |
| - GDRs |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

47 Transfers of Financial Assets (Continued)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **Notes** | **31 December 2024** | | **31 December 2023** | |
| *In thousands of EUR* | **Carrying amount of the assets at year end** | **Carrying amount of the associated liabilities** | **Carrying amount of the assets at year end** | **Carrying amount of the associated liabilities** |
|  |  |  |  |  |  |
| Corporate bonds at FVOCI |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Other financial assets at AC*** |  |  |  |  |  |
| - Trade receivables |  |  |  |  |  |
| - Finance lease receivables |  |  |  |  |  |
| - Credit and debit card receivables |  |  |  |  |  |
| - Settlements on conversion operations |  |  |  |  |  |
| - Other |  |  |  |  |  |
|  |  |  |  |  |  |
| ***Other financial assets at FVTPL*** |  |  |  |  |  |
| - FX forward contracts |  |  |  |  |  |
| - Precious metals forward contracts |  |  |  |  |  |
| - Other |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Total** |  |  |  |  |  |
|  |  |  |  |  |  |

The following schedule provides information about transfers where the counterparties to the associated liabilities have recourse only to the transferred assets. This is the case for the Group’s securitisation transactions.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **31 December 2024** | | | **31 December 2023** | | |
| *In thousands of EUR* | **Fair value of the assets at year end** | **Fair value of the associated liabilities** | **Net position** | **Fair value of the assets at year end** | **Fair value of the associated liabilities** | **Net position** |
|  |  |  |  |  |  |  |
| Corporate loans |  |  |  |  |  |  |
| Loans to individuals |  |  |  |  |  |  |
| Debt securities mandatorily measured at FVTPL |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds  - Investments in mutual funds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Debt securities designated as at FVTPL at initial recognition |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

47 Transfers of Financial Assets (Continued)

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **31 December 2024** | | | **31 December 2023** | | |
| *In thousands of EUR* | **Fair value of the assets at year end** | **Fair value of the associated liabilities** | **Net position** | **Fair value of the assets at year end** | **Fair value of the associated liabilities** | **Net position** |
|  |  |  |  |  |  |  |
| Debt securities at FVOCI |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Debt securities at AC |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Equity securities mandatorily measured at FVTPL |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |
| - ADRs |  |  |  |  |  |  |
| - GDRs |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Equity securities at FVOCI |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |
| - ADRs |  |  |  |  |  |  |
| - GDRs |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Corporate bonds at FVOCI |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Other financial assets at AC*** |  |  |  |  |  |  |
| - Trade receivables |  |  |  |  |  |  |
| - Finance lease receivables |  |  |  |  |  |  |
| - Credit and debit card receivables |  |  |  |  |  |  |
| - Settlements on conversion operations |  |  |  |  |  |  |
| - Other |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

47 Transfers of Financial Assets (Continued)

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **31 December 2024** | | | **31 December 2023** | | |
| *In thousands of EUR* | **Fair value of the assets at year end** | **Fair value of the associated liabilities** | **Net position** | **Fair value of the assets at year end** | **Fair value of the associated liabilities** | **Net position** |
|  |  |  |  |  |  |  |
| ***Other financial assets at FVTPL*** |  |  |  |  |  |  |
| - FX forward contracts |  |  |  |  |  |  |
| - Precious metals forward contracts |  |  |  |  |  |  |
| - Other |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

The following schedule summarises transfers where the entity continues to recognise the assets to the extent of its continuing involvement. The analysis is provided by class of financial assets.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **31 December 2024** | | | **31 December 2023** | | |
| *In thousands of EUR* | **Carrying amount of the assets before the transfer** | **Carrying amount of the assets that the entity continues to recognise after the transfer** | **Carrying amount of the associated liabilities** | **Carrying amount of the assets before the transfer** | **Carrying amount of the assets that the entity continues to recognise after the transfer** | **Carrying amount of the associated liabilities** |
|  |  |  |  |  |  |  |
| Corporate loans |  |  |  |  |  |  |
| Loans to individuals |  |  |  |  |  |  |
| Debt securities mandatorily measured at FVTPL |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds  - Investments in mutual funds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Debt securities designated as at FVTPL at initial recognition |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Debt securities at FVOCI |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

47 Transfers of Financial Assets (Continued)

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **31 December 2024** | | | **31 December 2023** | | |
| *In thousands of EUR* | **Carrying amount of the assets before the transfer** | **Carrying amount of the assets that the entity continues to recognise after the transfer** | **Carrying amount of the associated liabilities** | **Carrying amount of the assets before the transfer** | **Carrying amount of the assets that the entity continues to recognise after the transfer** | **Carrying amount of the associated liabilities** |
|  |  |  |  |  |  |  |
| Debt securities at AC |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Equity securities mandatorily measured at FVTPL |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |
| - ADRs |  |  |  |  |  |  |
| - GDRs |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Equity securities at FVOCI |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |
| - ADRs |  |  |  |  |  |  |
| - GDRs |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| Corporate bonds at FVOCI |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Other financial assets at AC*** |  |  |  |  |  |  |
| - Trade receivables |  |  |  |  |  |  |
| - Finance lease receivables |  |  |  |  |  |  |
| - Credit and debit card receivables |  |  |  |  |  |  |
| - Settlements on conversion operations |  |  |  |  |  |  |
| - Other |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

47 Transfers of Financial Assets (Continued)

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **31 December 2024** | | | **31 December 2023** | | |
| *In thousands of EUR* | **Carrying amount of the assets before the transfer** | **Carrying amount of the assets that the entity continues to recognise after the transfer** | **Carrying amount of the associated liabilities** | **Carrying amount of the assets before the transfer** | **Carrying amount of the assets that the entity continues to recognise after the transfer** | **Carrying amount of the associated liabilities** |
|  |  |  |  |  |  |  |
| ***Other financial assets at FVTPL*** |  |  |  |  |  |  |
| - FX forward contracts |  |  |  |  |  |  |
| - Precious metals forward contracts |  |  |  |  |  |  |
| - Other |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

***(b) Transfers that qualified for derecognition of the financial asset in its entirety***

The Group transferred financial assets in transactions that qualified for derecognition in the current and prior periods and to which the Group retained exposed to a certain extent.

***Disposal of loans.*** At 31 December 2024, the Group had remaining exposure to [mortgage] loans that had carrying value of EUR \_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) immediately before they were transferred to [a related party under common control]. The Group is exposed to late payment risk as it guaranteed payment of interest over a period up to 30 days from the date of transfer. The loans were derecognised in their entirety as the retained late payment risk was not considered significant.

***Securitisation transaction.*** In addition, at 31 December 2024, the Group had remaining exposure to [corporate] loans that had carrying value of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_ thousand) immediately before their transfer to a securitisation special purpose entity that the Group does not consolidate. The loans were derecognised in their entirety because the written put option to repurchase them was deeply out of money at the date of the transfer and substantially all of the subordinated borrowings of the securitisation special purpose entity were acquired by third party investors.

The following schedule summarises information about continuing involvement in the transferred financial assets that qualified for derecognition. The analysis is provided by type of continuing involvement outstanding at 31 December 2024:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Cash outflows to repurchase the derecog-nised assets or other payments** | **Carrying amount of continuing involvement in the consolidated statement of financial position** | | | **Fair value of continuing involvement** | | **Maximum exposure to loss** |
| *In thousands of EUR* | **Deriva-tive financial assets (Note** [**15**](#_heading=h.2bn6wsx)**)** | **Deriva-tive financial liabilities (Note** [**26**](#_heading=h.vx1227)**)** | **Provisions (Note** [**25**](#_heading=h.41mghml)**)** | **Assets** | **Liabilities** |  |
|  |  |  |  |  |  |  |  |
| Written put options |  |  |  |  |  |  |  |
| Purchased call options |  |  |  |  |  |  |  |
| Late payment risk guarantee |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

47 Transfers of Financial Assets (Continued)

The analysis is provided by type of continuing involvement outstanding at 31 December 2023:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Cash outflows to repurchase the derecog-nised assets or other payments** | **Carrying amount of continuing involvement in the consolidated statement of financial position** | | | **Fair value of continuing involvement** | | **Maximum exposure to loss** |
| *In thousands of EUR* | **Deriva-tive financial assets (Note** [**15**](#_heading=h.2bn6wsx)**)** | **Deriva-tive financial liabilities (Note** [**26**](#_heading=h.vx1227)**)** | **Provisions (Note** [**25**](#_heading=h.41mghml)**)** | **Assets** | **Liabilities** |  |
|  |  |  |  |  |  |  |  |
| Written put options |  |  |  |  |  |  |  |
| Purchased call options |  |  |  |  |  |  |  |
| Late payment risk guarantee |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

The following schedule presents remaining contractual maturity analysis of the undiscounted cash flows to repurchase the transferred assets or other amounts payable to the transferee in respect of financial assets that qualified for derecognition. Where the cash flows are variable, they are disclosed based on the conditions that existed at each reporting date. The analysis is provided by type of continuing involvement outstanding at the respective end of the reporting period:

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | | **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 2024** | |  |  | |  |  | |  |  |
|  | |  |  | |  |  | |  |  |
| Written put options | |  |  | |  |  | |  |  |
| Purchased call options | |  |  | |  |  | |  |  |
| Late payment risk guarantee | |  |  | |  |  | |  |  |
|  | |  |  | |  |  | |  |  |
|  | |  |  | |  |  | |  |  |
| **Total potential cash outflows** | |  |  | |  |  | |  |  |
|  |  | | |  | | |  | | |
|  | |  |  | |  |  | |  |  |
| **At 31 December 2023** | |  |  | |  |  | |  |  |
|  | |  |  | |  |  | |  |  |
| Written put options | |  |  | |  |  | |  |  |
| Purchased call options | |  |  | |  |  | |  |  |
| Late payment risk guarantee | |  |  | |  |  | |  |  |
|  | |  |  | |  |  | |  |  |
|  | |  |  | |  |  | |  |  |
| **Total potential cash outflows** | |  |  | |  |  | |  |  |
|  |  | | |  | | |  | | |

47 Transfers of Financial Assets (Continued)

The following schedule presents gains less losses recognised on the date of transfer, subsequent gains or losses recognised on the continuing involvement and the cumulative amount of the gains or losses. The analysis is provided by type of continuing involvement.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Year ended 31 December 2024** | | | **Year ended 31 December 2023** | | |
| *In thousands of EUR* | **The gain or loss recognised at the date of transfer** | **Subsequent gains and losses recognised in the reporting period** | **Cumulative amount of gains and losses recognised** | **The gain or loss recognised at the date of transfer** | **Subsequent gains and losses recognised in the reporting period** | **Cumulative amount of gains and losses recognised** |
|  |  |  |  |  |  |  |
| Written put options |  |  |  |  |  |  |
| Purchased call options |  |  |  |  |  |  |
| Later payment risk guarantee |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Total** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

The transfer activity was not evenly distributed during the reporting period. The following schedule provides analysis of transfer activity by month and by type of the continuing involvement during 2024:

|  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Jan** | **Feb** | **Mar** | **April** | **May** | **June** | **July** | **Aug** | **Sept** | **Oct** | **Nov** | **Dec** |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| *Written put options:* |  |  |  |  |  |  |  |  |  |  |  |  |
| Gains less losses recognised |  |  |  |  |  |  |  |  |  |  |  |  |
| Proceeds from transfer activity |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| *Purchased call options:* |  |  |  |  |  |  |  |  |  |  |  |  |
| Gains less losses recognised |  |  |  |  |  |  |  |  |  |  |  |  |
| Proceeds from transfer activity |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| *Late payment risk guarantee:* |  |  |  |  |  |  |  |  |  |  |  |  |
| Gains less losses recognised |  |  |  |  |  |  |  |  |  |  |  |  |
| Proceeds from transfer activity |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |

The following schedule provides analysis of transfer activity by month and by type of the continuing involvement during 2023:

|  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Jan** | **Feb** | **Mar** | **April** | **May** | **June** | **July** | **Aug** | **Sept** | **Oct** | **Nov** | **Dec** |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| *Written put options:* |  |  |  |  |  |  |  |  |  |  |  |  |
| Gains less losses recognised |  |  |  |  |  |  |  |  |  |  |  |  |
| Proceeds from transfer activity |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| *Purchased call options:* |  |  |  |  |  |  |  |  |  |  |  |  |
| Gains less losses recognised |  |  |  |  |  |  |  |  |  |  |  |  |
| Proceeds from transfer activity |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |
| *Late payment risk guarantee:* |  |  |  |  |  |  |  |  |  |  |  |  |
| Gains less losses recognised |  |  |  |  |  |  |  |  |  |  |  |  |
| Proceeds from transfer activity |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |

47 Transfers of Financial Assets (Continued)

[The transfer activity was not evenly distributed during the reporting period. In [month] 2024, the Group sold a portfolio of [loans] for EUR \_\_\_\_ thousand recognising a net gain of EUR \_\_\_\_ thousand. In this transaction, the Group [guaranteed late payment risk up to 30 days by agreeing to pay late payment interest for such period to the purchaser]. In [month] 2024, the Group sold a portfolio of [loans] for EUR \_\_\_\_ thousand recognising a net gain of EUR \_\_\_\_ thousand. In this transaction, the Group [issued to the purchaser a put option that was deeply out of money].

In [month] 2023, the Group sold a portfolio of [loans] for EUR \_\_\_\_ thousand recognising a net gain of EUR \_\_\_\_ thousand. In this transaction, the Group [guaranteed late payment risk up to 30 days by agreeing to pay late payment interest for such period to the purchaser]. In [month] 2023, the Group sold a portfolio of [loans] for EUR \_\_\_\_ thousand recognising a net gain of EUR \_\_\_\_ thousand. In this transaction, the Group [issued to the purchaser a put option that was deeply out of money].]

# Derivative Financial Instruments

Derivative financial instruments, including foreign exchange contracts, interest rate futures, forward rate agreements, currency and interest rate swaps, and currency and interest rate options 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.]

[Certain derivative instruments embedded in financial liabilities and other non-financial contracts are treated as separate derivative instruments when their risks and characteristics are not closely related to those of the host contract.]

48 Derivative Financial Instruments (Continued)

The table below sets out fair values, at the end of the reporting period, of currencies receivable or payable under foreign exchange forward and swap contracts entered into by the Group. The table reflects gross positions before the netting of any counterparty positions (and payments) and covers the contracts with settlement dates after the end of the respective reporting period. The contracts are short term in nature:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | **Notes** | **2024** | | **2023** | |
| *In thousands of EUR* | **Contracts with positive fair value** | **Contracts with negative fair value** | **Contracts with positive fair value** | **Contracts with negative fair value** |
|  |  |  |  |  |  |
| **Foreign exchange forwards and swaps: fair values, at the end of the reporting period, of** |  |  |  |  |  |
| - USD receivable on settlement (+) |  |  |  |  |  |
| - USD payable on settlement (-) |  |  |  |  |  |
| - EUR receivable on settlement (+) |  |  |  |  |  |
| - EUR payable on settlement (-) |  |  |  |  |  |
| - CZK receivable on settlement (+) |  |  |  |  |  |
| - CZK payable on settlement (-) |  |  |  |  |  |
| - Other currencies receivable on settlement (+) |  |  |  |  |  |
| - Other currencies payable on settlement (-) |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| **Net fair value of foreign exchange forwards and swaps** | **15, 26** |  |  |  |  |
|  |  |  |  |  |  |

Foreign exchange [and other] derivative financial instruments entered into by the Group are generally traded in an over-the-counter market with professional market counterparties on standardised contractual terms and conditions. Derivatives have potentially favourable (assets) or unfavourable (liabilities) conditions as a result of fluctuations in market interest rates, foreign exchange rates or other variables relative to their terms. The aggregate fair values of derivative financial assets and liabilities can fluctuate significantly from time to time.

[At 31 December 2024, the Group had outstanding obligations to deliver precious metals with fair value of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) and obligations to accept delivery of precious metals with fair value of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). The Group expects to settle these forward contracts net in cash and, therefore, recognised them in the statement of financial position as an asset at net fair value of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) and a liability at net fair value of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). Refer to Notes 15 and 26. ]

At 31 December 2024, the Group had outstanding obligations from unsettled spot transactions with foreign currencies [and precious metals] of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). The net fair value of unsettled spot transactions is insignificant.

[The Group had outstanding obligations to deliver shares with fair value, at the end of the reporting period, of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) and obligations to accept delivery of \_\_\_\_\_ shares with fair value, at the end of the reporting period, of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). These forwards were recognised in the statement of financial position as an asset at fair value of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) and a liability at fair value of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). Refer to Notes 15 and [26](#_heading=h.vx1227).]

48 Derivative Financial Instruments (Continued)

At 31 December 2024, the Group had outstanding [written] [purchased] put options giving [the counterparty] [the Group] the right to sell [shares] with fair value of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) to [the Group] [the counterparty] for EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). The options can be exercised [from \_\_\_\_ 20XX to \_\_\_\_ 20XX]. The fair value of the outstanding put options was recognised as [a liability] [an asset] of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). Refer to Notes 15 and 26.

At 31 December 2024, the Group had outstanding [written] [purchased] call options giving [the counterparty] [the Group] the right to buy [shares] with fair value of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand) from [the Group] [the counterparty] for EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). The options can be exercised [from \_\_\_\_ 20XX to \_\_\_\_ 20XX]. The fair value of the outstanding call options was recognised as [a liability] [an asset] of EUR \_\_\_\_\_ thousand (2023: EUR \_\_\_\_\_ thousand). Refer to Notes 15 and 26.

# Fair Value Disclosures

*[Note: This note should be tailored to the circumstances of each entity, eg description of valuation processes, disclosure of assumptions and valuation methods will significantly differ among entities.]*

*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. [The price within the bid-ask spread that is most representative of fair value in the circumstances was used to measure fair value, which management considers is [the last trading price on the reporting date] [the average of actual trading prices on the reporting date]. [The quoted market price used to value financial assets is the current bid price; the quoted market price for financial liabilities is the current asking price.]

[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 (ie an asset) for a particular risk exposure or paid to transfer a net short position (ie 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 entity’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 entity’s exposure to a particular market risk (or risks) arising from the financial assets and financial liabilities is substantially the same.]

49 Fair Value Disclosures (Continued)

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.

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.

49 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 2024** | | | | **31 December 2023** | | | |
| *In thousands of EUR* | **Level 1** | **Level 2** | **Level 3** | **Total** | **Level 1** | **Level 2** | **Level 3** | **Total** |
|  |  |  |  |  |  |  |  |  |
| **ASSETS AT FAIR VALUE** |  |  |  |  |  |  |  |  |
| **FINANCIAL ASSETS** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| ***Investments in debt securities*** |  |  |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |  |  |
| - Investments in mutual funds |  |  |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| ***Investments in equity securities*** |  |  |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |  |  |
| - American depositary receipts (ADR) |  |  |  |  |  |  |  |  |
| - Global depositary receipts (GDR) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **Loans and advances to customers at FVTPL** |  |  |  |  |  |  |  |  |
| - Standard lending |  |  |  |  |  |  |  |  |
| - Specialised lending |  |  |  |  |  |  |  |  |
| - Loans to sovereigns |  |  |  |  |  |  |  |  |
| - Loans to sub-sovereigns |  |  |  |  |  |  |  |  |
| - Loans to SME |  |  |  |  |  |  |  |  |
| - Loans to leasing companies |  |  |  |  |  |  |  |  |
| - Reverse sale and repurchase agreement |  |  |  |  |  |  |  |  |
| - Mortgage loans |  |  |  |  |  |  |  |  |
| - Consumer loans |  |  |  |  |  |  |  |  |
| - Car loans |  |  |  |  |  |  |  |  |
| - Credit cards |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| ***Repurchase receivables at FV*** |  |  |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |  |  |
| - Investments in mutual funds |  |  |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |  |  |
| - American depositary receipts (ADR) |  |  |  |  |  |  |  |  |
| - Global depositary receipts (GDR) |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

49 Fair Value Disclosures (Continued)

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **31 December 2024** | | | | **31 December 2023** | | | |
| *In thousands of EUR* | **Level 1** | **Level 2** | **Level 3** | **Total** | **Level 1** | **Level 2** | **Level 3** | **Total** |
|  |  |  |  |  |  |  |  |  |
| ***Other financial assets*** |  |  |  |  |  |  |  |  |
| - Foreign exchange forward contracts |  |  |  |  |  |  |  |  |
| - Precious metals forward contracts |  |  |  |  |  |  |  |  |
| - Other financial derivatives |  |  |  |  |  |  |  |  |
| - Other |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **NON-FINANCIAL ASSETS** |  |  |  |  |  |  |  |  |
| - Premises and equipment |  |  |  |  |  |  |  |  |
| - Investment properties |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **TOTAL ASSETS WITH RECURRING FAIR VALUE MEASUREMENTS** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **LIABILITIES CARRIED AT FAIR VALUE** |  |  |  |  |  |  |  |  |
| **FINANCIAL LIABILITIES** |  |  |  |  |  |  |  |  |
| ***Due to other banks*** |  |  |  |  |  |  |  |  |
| - Liability to return collateral sold or repledged |  |  |  |  |  |  |  |  |
| ***Other borrowed funds*** |  |  |  |  |  |  |  |  |
| - Liability to return collateral sold or repledged |  |  |  |  |  |  |  |  |
| - Other structured funding |  |  |  |  |  |  |  |  |
| ***Other financial liabilities*** |  |  |  |  |  |  |  |  |
| - Foreign exchange forward contracts |  |  |  |  |  |  |  |  |
| - Other derivative financial instruments |  |  |  |  |  |  |  |  |
| - Short sales of securities |  |  |  |  |  |  |  |  |
| - Liabilities designated at FVTPL at initial recognition |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
| **TOTAL LIABILITIES WITH RECURRING FAIR VALUE MEASUREMENTS** |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

The investment in [company] included in trading securities ceased to be traded in an active market in [October 2023] due to the deteriorating financial markets liquidity, and was reported as a level 2 instrument in the above analysis at 31 December 2023. In [November 2024], trading resumed and the investment was reclassified and reported as a level 1 instrument in the above analysis at 31 December 2024. *[Disclose transfers between Level 1 and Level 2 and reasons for the transfers.]*

49 Fair Value Disclosures (Continued)

The Group uses a [discounted cash flow] valuation technique to measure the fair value of [currency swaps] that are not traded in an active market. However, in accordance with IFRS, the fair value of an instrument at inception is generally the transaction price. If the transaction price differs from the amount determined at inception using the valuation technique, that difference is amortised on a straight line basis over the term of the [currency swaps]. The differences yet to be recognised in profit or loss for the year ([as gains less losses on financial derivatives]) are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| Balance at 1 January |  |  |
| New transactions |  |  |
| Amounts recognised in profit or loss for the year ([as gains less losses on financial derivatives]) |  |  |
| Other |  |  |
|  |  |  |
|  |  |  |
| **Balance at 31 December (Note 15)** |  |  |
|  |  |  |

The description of valuation technique and description of inputs used in the fair value measurement for level 2 measurements at 31 December 2024:

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Fair value** | **Valuation technique** | **Inputs used** |
|  |  |  |  |
| **ASSETS AT FAIR VALUE** |  |  |  |
| **FINANCIAL ASSETS** |  |  |  |
|  |  |  |  |
| ***Investments in debt securities*** |  |  |  |
| - [Country] government bonds |  | [Discounted cash flows (“DCF”)] | [Government bonds yield curve] |
| - Municipal bonds |  | [DCF] | [Comparable prices from less active markets] |
| - Corporate bonds |  | [DCF] | [Incremental borrowing rate] |
| - Investments in mutual funds |  | [DCF] | [Applicable interest rates for underlying assets] |
| - Promissory notes |  | [DCF] | [Incremental borrowing rate] |
|  |  |  |  |
| ***Investments in equity securities*** |  |  |  |
| - Corporate shares |  | [Market comparable companies] | [EBITDA Multiple and Revenue multiple] |
| - American depositary receipts (ADR) |  |  |  |
| - Global depositary receipts |  |  |  |
|  |  |  |  |
|  |  |  |  |
| ***Loans and advances to customers at FVTPL*** |  |  |  |
| - Standard lending |  |  |  |
| - Specialised lending |  |  |  |
| - Loans to sovereigns |  |  |  |
| - Loans to sub-sovereigns |  |  |  |
| - Loans to SME |  |  |  |
| - Loans to leasing companies |  |  |  |
| - Reverse sale and repurchase agreement |  |  |  |
| - Mortgage loans |  |  |  |
| - Consumer loans |  |  |  |
| - Car loans |  |  |  |
| - Credit cards |  |  |  |
|  |  |  |  |
|  |  |  |  |

49 Fair Value Disclosures (Continued)

|  |  |  |  |
| --- | --- | --- | --- |
| *In thousands of EUR* | **Fair value** | **Valuation technique** | **Inputs used** |
|  |  |  |  |
| ***Repurchase receivables*** |  |  |  |
| - [Country] government bonds |  |  |  |
| - Municipal bonds |  |  |  |
| - Corporate bonds |  |  |  |
| - Investments in mutual funds |  |  |  |
| - Promissory notes |  |  |  |
| - Corporate shares |  |  |  |
| - American depositary receipts (ADR) |  |  |  |
|  |  |  |  |
| - Global depositary receipts (GDR) |  |  |  |
|  |  |  |  |
| ***Other financial assets*** |  |  |  |
| - Foreign exchange forward contracts |  |  |  |
| - Precious metals forward contracts |  |  |  |
| - Other financial derivatives |  |  |  |
| - Other |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **NON-FINANCIAL ASSETS** |  |  |  |
| - Premises and equipment |  |  |  |
| - Investment properties |  |  |  |
|  |  |  |  |
| **LIABILITIES CARRIED AT FAIR VALUE** |  |  |  |
| **FINANCIAL LIABILITIES** |  |  |  |
|  |  |  |  |
| ***Due to other banks*** |  |  |  |
| - Liability to return collateral sold or repledged |  |  |  |
|  |  |  |  |
| ***Other borrowed funds*** |  |  |  |
| - Liability to return collateral sold or repledged |  |  |  |
| - Other structured funding |  |  |  |
|  |  |  |  |
| ***Other financial liabilities*** |  |  |  |
| - Foreign exchange forward contracts |  |  |  |
| - Other derivative financial instruments |  |  |  |
| - Short sales of securities |  |  |  |
| - Liabilities designated at FVTPL at initial recognition |  |  |  |
|  |  |  |  |
|  |  |  |  |
| **TOTAL RECURRING FAIR VALUE MEASUREMENTS AT LEVEL 2** |  |  |  |
|  |  |  |  |

There were no changes in valuation technique for level 2 recurring fair value measurements during the year ended 31 December 2024 (2023: none). *[Disclose nature and reason for any change in valuation technique.]*

49 Fair Value Disclosures (Continued)

The valuation technique, inputs used in the fair value measurement for level 3 measurements and related sensitivity to reasonably possible changes in those inputs are as follows at 31 December 2024:

| *In thousands of EUR* | **Fair**  **value** | **Valuation technique** | **Inputs**  **used** | **Range of inputs (weighted average)** | **Reasonable change** | **Sensitivity of fair value measu-rement** |
| --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |  |
| **ASSETS AT FAIR VALUE** |  |  |  |  |  |  |
| **FINANCIAL ASSETS** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Investments in debt securities*** |  |  |  |  |  |  |
| - [Country] government bonds |  | [Discounted cash flows (“DCF”)] | [Government bonds yield curve] | [5.0 ‒ 6.0% (5.5%)] | [± 10 %] | ± [100,000] |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Investments in mutual funds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Investments in equity securities*** |  |  |  |  |  |  |
| - Corporate shares |  | [Market comparable companies] | [EBITDA multiple Revenue multiple] | [7 -12 (10)]  [5 -6 (5.4)] |  |  |
| - American depositary receipts (ADR)  - Global depositary receipts (GDR) |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Loans and advances to customers at FVTPL*** |  |  |  |  |  |  |
| - Standard lending |  |  |  |  |  |  |
| - Specialised lending |  |  |  |  |  |  |
| - Loans to sovereigns |  |  |  |  |  |  |
| - Loans to sub-sovereigns |  |  |  |  |  |  |
| - Loans to SME |  |  |  |  |  |  |
| - Loans to leasing companies |  |  |  |  |  |  |
| - Reverse sale and repurchase agreement |  |  |  |  |  |  |
| - Mortgage loans |  |  |  |  |  |  |
| - Consumer loans |  |  |  |  |  |  |
| - Car loans |  |  |  |  |  |  |
| - Credit cards |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Repurchase receivables*** |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Investments in mutual funds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |
| - American depositary receipts (ADR) |  |  |  |  |  |  |
| - Global depositary receipts (GDR) |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

49 Fair Value Disclosures (Continued)

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Fair**  **value** | **Valuation technique** | **Inputs**  **used** | **Range of inputs (weighted average)** | **Reasonable change** | **Sensitivity of fair value measu-rement** |
|  |  |  |  |  |  |  |
| ***Other financial assets*** |  |  |  |  |  |  |
| - Foreign exchange forward contracts |  |  |  |  |  |  |
| - Precious metals forward contracts |  |  |  |  |  |  |
| - Other financial derivatives |  |  |  |  |  |  |
| - Other |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **NON-FINANCIAL ASSETS** |  |  |  |  |  |  |
| - Premises and equipment |  |  |  |  |  |  |
| - Investment properties |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **LIABILITIES AT FAIR VALUE** |  |  |  |  |  |  |
| **FINANCIAL LIABILITIES** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Due to other banks*** |  |  |  |  |  |  |
| - Liability to return collateral sold or repledged |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Other borrowed funds*** |  |  |  |  |  |  |
| - Liability to return collateral sold or repledged |  |  |  |  |  |  |
| - Other structured funding |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Other financial liabilities*** |  |  |  |  |  |  |
| - Foreign exchange forward contracts |  |  |  |  |  |  |
| - Other derivative financial instruments |  |  |  |  |  |  |
| - Short sales of securities |  |  |  |  |  |  |
| - Liabilities designated at FVTPL at initial recognition |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **TOTAL RECURRING FAIR VALUE MEASUREMENTS AT LEVEL 3** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

49 Fair Value Disclosures (Continued)

The valuation technique, inputs used in the fair value measurement for level 3 measurements and related sensitivity to reasonably possible changes in those inputs are as follows at 31 December 2023:

| *In thousands of EUR* | **Fair**  **value** | **Valuation technique** | **Inputs**  **used** | **Range of inputs (weighted average)** | **Reasonable change** | **Sensitivity of fair value measu-rement** |
| --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |  |
| **ASSETS AT FAIR VALUE** |  |  |  |  |  |  |
| **FINANCIAL ASSETS** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Investments in debt securities*** |  |  |  |  |  |  |
| - [Country] government bonds |  | [Discounted cash flows (“DCF”)] | [Government bonds yield curve] | [5.0 ‒ 6.0% (5.5%)] | [± 10 %] | ± [100,000] |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Investments in mutual funds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Investments in equity securities*** |  |  |  |  |  |  |
| - Corporate shares |  | [Market comparable companies] | [EBITDA multiple Revenue multiple] | [7 -12 (10)]  [5 -6 (5.4)] |  |  |
| - American depositary receipts (ADR)  - Global depositary receipts (GDR) |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Loans and advances to customers at FVTPL*** |  |  |  |  |  |  |
| - Standard lending |  |  |  |  |  |  |
| - Specialised lending |  |  |  |  |  |  |
| - Loans to sovereigns |  |  |  |  |  |  |
| - Loans to sub-sovereigns |  |  |  |  |  |  |
| - Loans to SME |  |  |  |  |  |  |
| - Loans to leasing companies |  |  |  |  |  |  |
| - Reverse sale and repurchase agreement |  |  |  |  |  |  |
| - Mortgage loans |  |  |  |  |  |  |
| - Consumer loans |  |  |  |  |  |  |
| - Car loans |  |  |  |  |  |  |
| - Credit cards |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Repurchase receivables*** |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |
| - Investments in mutual funds |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |
| - American depositary receipts (ADR) |  |  |  |  |  |  |
| - Global depositary receipts (GDR) |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

49 Fair Value Disclosures (Continued)

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Fair**  **value** | **Valuation technique** | **Inputs**  **used** | **Range of inputs (weighted average)** | **Reasonable change** | **Sensitivity of fair value measu-rement** |
|  |  |  |  |  |  |  |
| ***Other financial assets*** |  |  |  |  |  |  |
| - Foreign exchange forward contracts |  |  |  |  |  |  |
| - Precious metals forward contracts |  |  |  |  |  |  |
| - Other financial derivatives |  |  |  |  |  |  |
| - Other |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **NON-FINANCIAL ASSETS** |  |  |  |  |  |  |
| - Premises and equipment |  |  |  |  |  |  |
| - Investment properties |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **LIABILITIES AT FAIR VALUE** |  |  |  |  |  |  |
| **FINANCIAL LIABILITIES** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Due to other banks*** |  |  |  |  |  |  |
| - Liability to return collateral sold or repledged |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Other borrowed funds*** |  |  |  |  |  |  |
| - Liability to return collateral sold or repledged |  |  |  |  |  |  |
| - Other structured funding |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| ***Other financial liabilities*** |  |  |  |  |  |  |
| - Foreign exchange forward contracts |  |  |  |  |  |  |
| - Other derivative financial instruments |  |  |  |  |  |  |
| - Short sales of securities |  |  |  |  |  |  |
| Liabilities designated at FVTPL at initial recognition |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **TOTAL RECURRING FAIR VALUE MEASUREMENTS AT LEVEL 3** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

49 Fair Value Disclosures (Continued)

The above tables disclose sensitivity to valuation inputs for financial assets and financial liabilities, if changing one or more of the unobservable inputs to reflect reasonably possible alternative assumptions would change fair value significantly. For this purpose, significance was judged with respect to profit or loss, and total assets or total liabilities, or, when changes in fair value are recognised in other comprehensive income, total equity.

There were no changes in valuation technique for level 3 recurring fair value measurements during the year ended 31 December 2024 (2023: none). *[Disclose nature and reason for change in valuation technique, disclose inputs used in prior valuation technique.]* Investment property represents industrial land and buildings that the Group valued using its expectation to convert them into a residential complex. *[Disclose if highest and best use differs from current use.]*

The Group has margin deposits with its counterparties, which serves as collateral for its outstanding derivative liabilities. In addition, 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.

The sensitivity of fair value measurement disclosed in the above table shows the direction that an increase or decrease in the respective input variables would have on the valuation result. For equity securities, increases in the EBITDA multiple would each lead to an increase in estimated value. However, an increase in the discount for lack of marketability would lead to a decrease in value. For debt securities, increases in discount rates and PD would both lead to a decrease in estimated value. No interrelationships between unobservable inputs used in the Group’s valuation of its Level 3 equity investments have been identified. However, for Level 3 debt securities, a change in the assumption used for the PD is expected to be accompanied by a directionally similar change in the discount rate. A reconciliation of movements in Level 3 of the fair value hierarchy by class of instruments for the year ended 31 December 2024 is as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Securities at FVTPL** | | **Securities at FVOCI** | | **Financial derivative assets** | **Financial derivative liabilities** |
| *In thousands of EUR* | **Corporate shares** | **Promi-ssory notes** | **Promi-ssory notes** | **Corporate shares** |
|  |  |  |  |  |  |  |
| **Fair value at 1 January 2024** |  |  |  |  |  |  |
| Gains or losses recognised in profit or loss for the year |  |  |  |  |  |  |
| Gains or losses recognised in other comprehensive income |  |  |  |  |  |  |
| Purchases |  |  |  |  |  |  |
| Issues or origination |  |  |  |  |  |  |
| Sales |  |  |  |  |  |  |
| Settlements |  |  |  |  |  |  |
| Transfers out of level 3 |  |  |  |  |  |  |
| Transfers into level 3 |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Fair value at 31 December 2024** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Unrealised revaluation gains less losses recognised in profit or loss for the year for assets held at 31 December 2024** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

49 Fair Value Disclosures (Continued)

A reconciliation of movements in Level 3 of the fair value hierarchy by class of instruments for the year ended 31 December 2023 is as follows:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
|  | **Securities at FVTPL** | | **Securities at FVOCI** | | **Financial derivative assets** | **Financial derivative liabilities** |
| *In thousands of EUR* | **Corporate shares** | **Promi-ssory notes** | **Promi-ssory notes** | **Corporate shares** |
|  |  |  |  |  |  |  |
| **Fair value at 1 January 2023** |  |  |  |  |  |  |
| Gains or losses recognised in profit or loss for the year |  |  |  |  |  |  |
| Gains or losses recognised in other comprehensive income |  |  |  |  |  |  |
| Purchases |  |  |  |  |  |  |
| Issues or origination |  |  |  |  |  |  |
| Sales |  |  |  |  |  |  |
| Settlements |  |  |  |  |  |  |
| Transfers out of level 3 |  |  |  |  |  |  |
| Transfers into level 3 |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Fair value at 31 December 2023** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
| **Unrealised revaluation gains less losses recognised in profit or loss for the year for assets held at 31 December 2023** |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

Certain derivatives and promissory notes were reclassified from level 3 to level 2 instruments due to the increased activity in financial markets in 2023. *[Describe significant transfers into and out of level 3.]*

Gains and losses on derivatives are [presented separately in profit or loss for the year.] *[Disclose where the gains/losses are in the profit for the year.]*

Certain derivatives and promissory notes were reclassified from level 3 to level 2 instruments due to the increased activity in financial markets in 2023. *[Describe significant transfers into and out of level 3.]*

***(b) Non-recurring fair value measurements***

The Group has written down its non-current assets held for sale to fair value less costs to sell. The fair value belongs to level 3 measurements in the fair value hierarchy. The valuation technique and inputs used in the fair value measurement at 31 December 2024:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  |  |  |  | **Range of inputs**  **(weighted average)** | |
| *In thousands of EUR* | **Fair value** | **Valuation technique** | **Inputs used** | **31 December 2024** | **31 December**  **2023** |
|  |  |  |  |  |  |
| Non-current assets held for sale (or disposal groups) |  | [Discounted cash flows (“DCF”)] | WACC | [5.0 -6.0% (5.5%)] | [5.0 -6.0% (5.5%)] |
|  |  |  | Terminal growth |  |  |
|  |  |  | Growth rate for years 1 to 5 |  |  |
|  |  |  |  |  |  |

49 Fair Value Disclosures (Continued)

[Non-current assets held for sale include an investment property that represents industrial land and buildings. The Group valued it using its expectation to convert it into a residential complex.] *[Disclose that highest and best use differs from current use.]*

***(c) Valuation processes for recurring and non-recurring level 3 fair value measurements***

Level 3 valuations are reviewed on a weekly basis by the Group’s valuation committee who report to the Board of Directors on a monthly basis. The committee considers the appropriateness of the valuation model inputs, as well as the valuation result using various valuation methods and techniques generally recognised as standard within the financial services industry. In selecting the most appropriate valuation model the committee performs back testing and considers which model’s results have historically aligned most closely to actual market transactions. In order to value level three equity investments, the Group utilises comparable trading multiples. Management determines comparable public companies (peers) based on industry, size, developmental stage and strategy. Management then calculates a trading multiple for each comparable company identified. The multiple is calculated by dividing the enterprise value of the comparable company by its earnings before interest, taxes, depreciation and amortisation (EBITDA). The trading multiple is then discounted for considerations such as illiquidity and differences between the comparable companies based on company-specific facts and circumstances.

The level three debt instruments are valued at the net present value of estimated future cash flows. The Group also considers liquidity, credit and market risk factors, and adjusts the valuation model as deemed necessary.

*[For fair value measurements categorised within Level 3 of the fair value hierarchy, an entity is required to disclose a description of the valuation processes used by the entity (including, for example, how an entity decides its valuation policies and procedures and analyses changes in fair value measurements from period to period) [IFRS13p93(g)]. The disclosure must be tailored to the entity’s specific circumstances.]*

49 Fair Value Disclosures (Continued)

***(d) 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 2024** | | | |  | **31 December 2023** | | | |
| *In thousands of EUR* | **Level 1 fair value** | **Level 2**  **fair value** | **Level 3**  **fair value** | **Total fair value** | **Carry-ing value** | **Level 1**  **fair value** | **Level 2**  **fair value** | **Level 3**  **fair value** | **Total fair value** | **Carry-ing value** |
|  |  |  |  |  |  |  |  |  |  |  |
| **ASSETS** |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| ***Due from other banks*** |  |  |  |  |  |  |  |  |  |  |
| - Short-term placements with other banks with original maturities of more than three months |  |  |  |  |  |  |  |  |  |  |
| - Reverse sale and repurchase agreements with other banks with original maturities of more than three months |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| ***Loans and advances to customers at AC*** |  |  |  |  |  |  |  |  |  |  |
| - Corporate loans |  |  |  |  |  |  |  |  |  |  |
| - Loans to individuals ‒ consumer loans |  |  |  |  |  |  |  |  |  |  |
| - Loans to individuals ‒ entrepreneurs |  |  |  |  |  |  |  |  |  |  |
| - Mortgage loans |  |  |  |  |  |  |  |  |  |  |
| - Reverse sale and repurchase agreements |  |  |  |  |  |  |  |  |  |  |
| - State and municipal organisations *[Adjust classes as appropriate]* |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| ***Investments in debt securities at AC*** |  |  |  |  |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| ***Other financial assets*** |  |  |  |  |  |  |  |  |  |  |
| Trade receivables |  |  |  |  |  |  |  |  |  |  |
| Finance lease receivables |  |  |  |  |  |  |  |  |  |  |
| Credit and debit cards receivables |  |  |  |  |  |  |  |  |  |  |
| Settlements on conversion operations |  |  |  |  |  |  |  |  |  |  |
| Restricted cash |  |  |  |  |  |  |  |  |  |  |
| Other |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| **NON-FINANCIAL ASSETS** |  |  |  |  |  |  |  |  |  |  |
| - Investment properties |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| **TOTAL** |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |

49 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 2024** | | | | | **31 December 2023** | | | | |
| *In thousands of EUR* | **Level 1**  **fair value** | **Level 2**  **fair value** | **Level 3**  **fair value** | **Total fair value** | **Carry-ing value** | **Level 1**  **fair value** | **Level 2**  **fair value** | **Level 3**  **fair value** | **Total fair value** | **Carry-**  **ing**  **value** |
|  |  |  |  |  |  |  |  |  |  |  |
| **FINANCIAL LIABILITIES** |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| ***Due to other banks*** |  |  |  |  |  |  |  |  |  |  |
| - Correspondent accounts and overnight placements of other banks |  |  |  |  |  |  |  |  |  |  |
| - Short-term placements of other banks |  |  |  |  |  |  |  |  |  |  |
| - Sale and repurchase agreements with other banks |  |  |  |  |  |  |  |  |  |  |
| - Overdue term placements of other banks |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| ***Customer accounts*** |  |  |  |  |  |  |  |  |  |  |
| - Current/settlement accounts of state and public organisations |  |  |  |  |  |  |  |  |  |  |
| - Term deposits of state and public organisations |  |  |  |  |  |  |  |  |  |  |
| - Current/settlement accounts of other legal entities |  |  |  |  |  |  |  |  |  |  |
| - Term deposits of other legal entities |  |  |  |  |  |  |  |  |  |  |
| - Current/demand accounts of individuals |  |  |  |  |  |  |  |  |  |  |
| - Term deposits of individuals |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| ***Debt securities in issue* [Promissory notes]** |  |  |  |  |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |  |  |  |  |
| - Eurobonds |  |  |  |  |  |  |  |  |  |  |
| - Bonds issued on domestic market |  |  |  |  |  |  |  |  |  |  |
| - Deposit certificates |  |  |  |  |  |  |  |  |  |  |
| - Debentures |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| ***Other borrowed funds*** |  |  |  |  |  |  |  |  |  |  |
| - Other structured funding |  |  |  |  |  |  |  |  |  |  |
| - Syndicated loan maturing on \_\_\_\_ |  |  |  |  |  |  |  |  |  |  |
| - Term borrowings from companies/government agencies |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| ***Other financial liabilities*** |  |  |  |  |  |  |  |  |  |  |
| - Trade payables |  |  |  |  |  |  |  |  |  |  |
| - Dividends payable |  |  |  |  |  |  |  |  |  |  |
| - Debit or credit card payables |  |  |  |  |  |  |  |  |  |  |
| - Settlements on conversion operations |  |  |  |  |  |  |  |  |  |  |
| - Provision for credit related commitments |  |  |  |  |  |  |  |  |  |  |
| - Other accrued liabilities |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| ***Subordinated debt*** |  |  |  |  |  |  |  |  |  |  |
| - Subordinated debt |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |
| **TOTAL** |  |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |

49 Fair Value Disclosures (Continued)

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.

For assets, the Group used assumptions about counterparty’s incremental borrowing rate and prepayment rates.

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.

# Presentation of Financial Instruments by Measurement Category

For the purposes of measurement, IFRS 9 “Financial Instruments” classifies financial assets into the following categories: (a) financial assets at FVTPL; (b) debt instruments at FVOCI, (c) equity instruments at FVOCI and (c) financial assets at AC. Financial assets at FVTPL have two sub-categories: (i) assets mandatorily measured at FVTPL, and (ii) assets designated as such upon initial recognition or subsequently. In addition, finance lease receivables form a separate category.

[All of the Group’s financial assets fell in the financial assets carried at AC measurement category except for financial derivatives. All of the Group’s financial liabilities except for derivatives were carried at AC. Derivatives belonged to the FVTPL measurement category.]

50 Presentation of Financial Instruments by Measurement Category (Continued)

The following table provides a reconciliation of financial assets with these measurement categories as of 31 December 2024:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **FVTPL (manda-tory)** | **FVTPL (desig-nated)** | **Debt instru-ments at FVOCI** | **Equity instru-ments at FVOCI** | **AC** | **Finance lease recei-vables** | **Total** |
|  |  |  |  |  |  |  |  |
| **ASSETS** |  |  |  |  |  |  |  |
| ***Cash and cash equivalents*** |  |  |  |  |  |  |  |
| ***Due from other banks*** |  |  |  |  |  |  |  |
| - Short-term placements with other banks with original maturities of more than three months |  |  |  |  |  |  |  |
| - Reverse sale and repurchase agreements with other banks with original maturities of more than three months |  |  |  |  |  |  |  |
| ***Investments in debt securities*** |  |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |  |
| - Investments in mutual funds |  |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |  |
| ***Investments in equity securities*** |  |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |  |
| - American depositary receipts (ADR) |  |  |  |  |  |  |  |
| - Global depositary receipts (GDR) |  |  |  |  |  |  |  |
| ***Loans and advances to customers*** |  |  |  |  |  |  |  |
| - Standard lending |  |  |  |  |  |  |  |
| - Specialised lending |  |  |  |  |  |  |  |
| - Loans to sovereigns |  |  |  |  |  |  |  |
| - Loans to sub-sovereigns |  |  |  |  |  |  |  |
| - Loans to SME |  |  |  |  |  |  |  |
| - Loans to leasing companies |  |  |  |  |  |  |  |
| - Reverse sale and repurchase agreement |  |  |  |  |  |  |  |
| - Mortgage loans |  |  |  |  |  |  |  |
| - Consumer loans |  |  |  |  |  |  |  |
| - Car loans |  |  |  |  |  |  |  |
| - Credit cards |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| ***Repurchase receivables*** |  |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |  |
| - American depositary receipts (ADR) |  |  |  |  |  |  |  |
| - Investments in mutual funds |  |  |  |  |  |  |  |
| - Global depositary receipts (GDR) |  |  |  |  |  |  |  |
| ***Other financial assets:*** |  |  |  |  |  |  |  |
| - Trade receivables |  |  |  |  |  |  |  |
| - Finance lease receivables |  |  |  |  |  |  |  |
| - Credit and debit cards receivables |  |  |  |  |  |  |  |
| - Settlements on conversion operations |  |  |  |  |  |  |  |
| - Restricted cash |  |  |  |  |  |  |  |
| - Foreign exchange forward contracts |  |  |  |  |  |  |  |
| - Precious metals forward contracts |  |  |  |  |  |  |  |
| - Other financial derivatives |  |  |  |  |  |  |  |
| *- Other* |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **TOTAL FINANCIAL ASSETS** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

50 Presentation of Financial Instruments by Measurement Category (Continued)

The following table provides a reconciliation of financial assets with measurement categories at 31 December 2023:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **FVTPL (manda-tory)** | **FVTPL (desig-nated)** | **Debt instru-ments at FVOCI** | **Equity instru-ments at FVOCI** | **AC** | **Finance lease recei-vables** | **Total** |
|  |  |  |  |  |  |  |  |
| **ASSETS** |  |  |  |  |  |  |  |
| ***Cash and cash equivalents*** |  |  |  |  |  |  |  |
| ***Due from other banks*** |  |  |  |  |  |  |  |
| - Short-term placements with other banks with original maturities of more than three months |  |  |  |  |  |  |  |
| - Reverse sale and repurchase agreements with other banks with original maturities of more than three months |  |  |  |  |  |  |  |
| ***Investments in debt securities*** |  |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |  |
| - Investments in mutual funds |  |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |  |
| ***Investments in equity securities*** |  |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |  |
| - American depositary receipts (ADR) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| - Global depositary receipts (GDR) |  |  |  |  |  |  |  |
| ***Loans and advances to customers*** |  |  |  |  |  |  |  |
| - Standard lending |  |  |  |  |  |  |  |
| - Specialised lending |  |  |  |  |  |  |  |
| - Loans to sovereigns |  |  |  |  |  |  |  |
| - Loans to sub-sovereigns |  |  |  |  |  |  |  |
| - Loans to SME |  |  |  |  |  |  |  |
| - Loans to leasing companies |  |  |  |  |  |  |  |
| - Reverse sale and repurchase agreement |  |  |  |  |  |  |  |
| - Mortgage loans |  |  |  |  |  |  |  |
| - Consumer loans |  |  |  |  |  |  |  |
| - Car loans |  |  |  |  |  |  |  |
| - Credit cards |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| ***Repurchase receivables*** |  |  |  |  |  |  |  |
| - [Country] government bonds |  |  |  |  |  |  |  |
| - Municipal bonds |  |  |  |  |  |  |  |
| - Corporate bonds |  |  |  |  |  |  |  |
| - Promissory notes |  |  |  |  |  |  |  |
| - Corporate shares |  |  |  |  |  |  |  |
| - American depositary receipts (ADR) |  |  |  |  |  |  |  |
| - Investments in mutual funds |  |  |  |  |  |  |  |
| - Global depositary receipts (GDR) |  |  |  |  |  |  |  |
| ***Other financial assets:*** |  |  |  |  |  |  |  |
| - Trade receivables |  |  |  |  |  |  |  |
| - Finance lease receivables |  |  |  |  |  |  |  |
| - Credit and debit cards receivables |  |  |  |  |  |  |  |
| - Settlements on conversion operations |  |  |  |  |  |  |  |
| - Restricted cash |  |  |  |  |  |  |  |
| - Foreign exchange forward contracts |  |  |  |  |  |  |  |
| - Precious metals forward contracts |  |  |  |  |  |  |  |
| - Other financial derivatives |  |  |  |  |  |  |  |
| *- Other* |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| **TOTAL FINANCIAL ASSETS** |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

50 Presentation of Financial Instruments by Measurement Category (Continued)

As of 31 December 2024 and 31 December 2023, all of the Group’s financial liabilities except for derivatives [, liabilities to return collateral sold or repledged and other structured funding designated at FVTPL at initial recognition (Note 24)] were carried at AC.

# 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.

At 31 December 2024, the outstanding balances with related parties were as follows:

| *In thousands of EUR* | **Immedi-ate parent company** | **Other signifi-cant share-holders** | **[Entities under common control]** | **Key manage-ment personnel** | **Asso-ciates** | **Joint ventures** | **Other related parties** |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  |  |  |  |  |  |  |  |
| Investments in debt securities |  |  |  |  |  |  |  |
| (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ % |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Investments in equity securities ( \_\_\_\_\_ % holding) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Due from other banks (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Credit loss allowance at  31 December 2024 |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Loans and advances to customers (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Credit loss allowance at  31 December 2024 |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Repurchase receivables |  |  |  |  |  |  |  |
| - Debt securities (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
| - Shares of \_\_\_\_\_ ( \_\_\_\_\_ % holding) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Investment in associates |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other assets |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Non-current assets held for sale (or disposal groups) |  |  |  |  |  |  |  |
| - Debt securities (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
| - Shares of \_\_\_\_\_ ( \_\_\_\_\_ % holding) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Due to other banks (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  | *continued on the following page* | | |

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Immedi-ate parent company** | **Other signifi-cant share-holders** | **[Entities under common control]** | **Key manage-ment personnel** | **Asso-ciates** | **Joint ventures** | **Other related parties** |
|  |  |  |  |  |  |  |  |
| *(continued)* |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Customer accounts (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Debt securities in issue [Promissory notes] (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other borrowed funds (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Provisions for liabilities and charges |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other liabilities |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Subordinated debt (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Liabilities directly associated with disposal groups held for sale (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

51 Related Party Transactions (Continued)

The income and expense items with related parties for 2024 were as follows:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Immedi-ate parent company** | **Other signifi-cant share-holders** | **[Entities under common control]** | **Key manage-ment personnel** | **Asso-ciates** | **Joint ventures** | **Other related parties** |
|  |  |  |  |  |  |  |  |
| Interest income |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Interest expense |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Dividend income received |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Gains less losses from securities at FVTPL |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Gains less losses from trading in foreign currencies |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Foreign exchange translation gains less losses |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Fee and commission income |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Fee and commission expense |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Gains/(losses) on initial recognition of assets at rates above/below market |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Gains/(losses) on initial recognition of liabilities at rates below/above market |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Impairment of investment securities at FVOCI |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Provision for credit related commitments |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other operating income |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Gains/(losses) arising from early retirement of debt |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Administrative and other operating expenses |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Share of result of associates |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

*[Disclose also any other information about the transactions and outstanding balances that is necessary for an understanding of the potential effect of the related party relationship on the financial statements.]*

51 Related Party Transactions (Continued)

At 31 December 2024, other rights and obligations with related parties were as follows:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Immedi-ate parent company** | **Other signifi-cant share-holders** | **[Entities under common control]** | **Key manage-ment personnel** | **Asso-ciates** | **Joint ventures** | **Other related parties** |
|  |  |  |  |  |  |  |  |
| Guarantees issued by the Group at the year end |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Guarantees received by the Group at the year end |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Import letters of credit at the year end |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Export letters of credit at the year end |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Contractual commitments to purchase goods |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Contractual commitments to purchase services |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Contractual commitments to sell goods |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Contractual commitments to sell services |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other commitments |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other contingent obligations |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

Aggregate amounts lent to and repaid by related parties during 2024 were:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Immedi-ate parent company** | **Other signifi-cant share-holders** | **[Entities under common control]** | **Key manage-ment personnel** | **Asso-ciates** | **Joint ventures** | **Other related parties** |
|  |  |  |  |  |  |  |  |
| Amounts lent to related parties during the year |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Amounts repaid by related parties during the year |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

51 Related Party Transactions (Continued)

At 31 December 2023, the outstanding balances with related parties were as follows:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Immedi-ate parent company** | **Other signifi-cant share-holders** | **[Entities under common control]** | **Key manage-ment personnel** | **Asso-ciates** | **Joint ventures** | **Other related parties** |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Investments in debt securities |  |  |  |  |  |  |  |
| (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ % |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Investments in equity securities ( \_\_\_\_\_ % holding) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Due from other banks (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Credit loss allowance at  31 December 2023 |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Loans and advances to customers (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Credit loss allowance at  31 December 2023 |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Repurchase receivables |  |  |  |  |  |  |  |
| - Debt securities (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
| - Shares of \_\_\_\_\_ ( \_\_\_\_\_ % holding) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Investment in associates |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other assets |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Non-current assets held for sale (or disposal groups) |  |  |  |  |  |  |  |
| - Debt securities (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
| - Shares of \_\_\_\_\_ ( \_\_\_\_\_ % holding) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Due to other banks (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Customer accounts (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Debt securities in issue [Promissory notes] (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  | *continued on the following page* | | |

51 Related Party Transactions (Continued)

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Immedi-ate parent company** | **Other signifi-cant share-holders** | **[Entities under common control]** | **Key manage-ment personnel** | **Asso-ciates** | **Joint ventures** | **Other related parties** |
|  |  |  |  |  |  |  |  |
| *(continued)* |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other borrowed funds (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Provisions for liabilities and charges |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other liabilities |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Subordinated debt (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Liabilities directly associated with disposal groups held for sale (contractual interest rate: \_\_\_\_\_ ‒ \_\_\_\_\_ %) |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

51 Related Party Transactions (Continued)

The income and expense items with related parties for 2023 were as follows:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Immedi-ate parent company** | **Other signifi-cant share-holders** | **[Entities under common control]** | **Key manage-ment personnel** | **Asso-ciates** | **Joint ventures** | **Other related parties** |
|  |  |  |  |  |  |  |  |
| Interest income |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Interest expense |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Credit loss allowance |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Dividend income received |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Gains less losses from securities at FVTPL |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Gains less losses from trading in foreign currencies |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Foreign exchange translation gains less losses |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Fee and commission income |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Fee and commission expense |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Gains/(losses) on initial recognition of assets at rates above/below market |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Gains/(losses) on initial recognition of liabilities at rates below/above market |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Impairment of investment securities at FVOCI |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Provision for credit related commitments |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other operating income |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Gains/(losses) arising from early retirement of debt |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Administrative and other operating expenses |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Share of result of associates |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

51 Related Party Transactions (Continued)

During 2024, the Group reacquired \_\_\_\_\_ [thousand] own shares from its related party, \_\_\_\_\_, for a total consideration of EUR \_\_\_\_\_ thousand (2023: related party \_\_\_\_\_, \_\_\_\_\_ [thousand shares] for EUR \_\_\_\_\_ thousand).

At 31 December 2023, other rights and obligations with related parties were as follows:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Immedi-ate parent company** | **Other signifi-cant share-holders** | **[Entities under common control]** | **Key manage-ment personnel** | **Asso-ciates** | **Joint ventures** | **Other related parties** |
|  |  |  |  |  |  |  |  |
| Guarantees issued by the Group at the year end |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Guarantees received by the Group at the year end |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Import letters of credit at the year end |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Export letters of credit at the year end |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Contractual commitments to purchase goods |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Contractual commitments to purchase services |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Contractual commitments to sell goods |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Contractual commitments to sell services |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other commitments |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Other contingent obligations |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

Aggregate amounts lent to and repaid by related parties during 2023 were:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *In thousands of EUR* | **Immedi-ate parent company** | **Other signifi-cant share-holders** | **[Entities under common control]** | **Key manage-ment personnel** | **Asso-ciates** | **Joint ventures** | **Other related parties** |
|  |  |  |  |  |  |  |  |
| Amounts lent to related parties during the year |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
| Amounts repaid by related parties during the year |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |

51 Related Party Transactions (Continued)

Key management compensation is presented below:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **2024** | | **2023** | |
| *In thousands of EUR* | **Expense** | **Accrued liability** | **Expense** | **Accrued liability** |
|  |  |  |  |  |
| *Short-term benefits:* |  |  |  |  |
| - Salaries |  |  |  |  |
| - Short-term bonuses |  |  |  |  |
| - Benefits in-kind |  |  |  |  |
|  |  |  |  |  |
| *Post-employment benefits:* |  |  |  |  |
| - Defined benefit retirement scheme |  |  |  |  |
| - State pension and social security costs |  |  |  |  |
| - Termination indemnity benefits |  |  |  |  |
|  |  |  |  |  |
| *Other long-term employee benefits:* |  |  |  |  |
| - Long-term bonus scheme |  |  |  |  |
| - Jubilee benefits |  |  |  |  |
|  |  |  |  |  |
| *Share-based compensation:* |  |  |  |  |
| - Cash-settled share-based compensation |  |  |  |  |
| - Equity-settled share-based compensation |  |  |  |  |
|  |  |  |  |  |
| Termination benefits |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| **Total** |  |  |  |  |
|  |  |  |  |  |

Short-term bonuses fall due wholly within twelve months after the end of the period in which management rendered the related services.

Commitments and contingent obligations towards key management personnel are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **2024** | **2023** |
|  |  |  |
| *Post-employment benefits:* |  |  |
| - Committed future retirement benefits not yet recognised as an expense |  |  |
| - Committed future termination indemnity benefits not yet recognised as an expense |  |  |
|  |  |  |
| *Other long-term employee benefits:* |  |  |
| - Committed long-term bonuses to be provided in exchange for future services |  |  |
| - Committed jubilee benefits not yet recognised as an expense |  |  |
|  |  |  |
| *Share-based compensation:* |  |  |
| - Unamortised balance of cash-settled share-based compensation obligation |  |  |
| - Unamortised balance of equity-settled share-based compensation |  |  |
|  |  |  |
| Unrecognised termination benefits entitlement in case of involuntary termination of employment |  |  |
|  |  |  |
|  |  |  |
| **Total commitments and contingent liabilities to key management personnel** |  |  |
|  |  |  |

As of 31 December 2024 and 2023, the Bank’s immediate [and ultimate] parent company was \_\_\_\_\_, and the Bank was ultimately controlled by Mr \_\_\_\_\_.

# Business Combinations

On \_\_\_\_\_ 2024, the Group acquired \_\_\_\_\_% of the share capital of \_\_\_\_\_ and obtained control through its ability to cast a majority of votes in the general meeting of shareholders. The acquired subsidiary will increase the Group’s penetration of its chosen retail and corporate markets and is expected to improve profitability through the economies of scale.

The acquisition-date fair value of the total purchase consideration and its components are as follows:

|  |  |
| --- | --- |
| *In thousands of EUR* |  |
|  |  |
| Cash consideration paid |  |
| Fair value of new issued shares of the acquirer |  |
| Tangible or intangible assets of acquirer transferred |  |
| Liability for contingent consideration incurred |  |
|  |  |
|  |  |
| **Total consideration transferred** |  |
|  |  |
|  |  |
| Less remuneration for future services of the former owner |  |
| Less indemnification asset |  |
| Investment in the acquiree prior to the acquisition |  |
|  |  |
|  |  |
| **Total purchase consideration and previously held interest in the acquire** |  |
|  |  |

The investment in the acquiree at FVOCI held prior to the acquisition was remeasured to its fair value at the acquisition date and an accumulated gain of EUR \_\_\_\_ thousand was transferred to retained earnings directly in equity. The fair value of the new issued shares of the acquirer was determined on the basis of the closing market price of the ordinary shares on the acquisition date.

[The contingent consideration arrangement requires the Group to pay the former owners of the acquiree \_\_\_\_ per cent of the revenues of an unconsolidated equity investment owned by the acquiree, in excess of EUR \_\_\_\_ thousand for 2024, up to a maximum amount of EUR \_\_\_\_\_ thousand (undiscounted). The potential undiscounted amount of all future payments that the Group could be required to make under the contingent consideration arrangement is between EUR \_\_\_\_\_ thousand and EUR \_\_\_\_\_ thousand. The fair value of the contingent consideration arrangement of EUR \_\_\_\_\_ thousand was estimated by applying the income approach. The fair value estimates are based on an assumed discount rate range of \_\_\_\_–\_\_\_\_ per cent and assumed probability-adjusted revenues in equity investee of EUR \_\_\_\_\_ thousand to EUR \_\_\_\_\_ thousand. As of 31 December 2024, neither the amount recognised for the contingent consideration arrangement, nor the range of outcomes or the assumptions used to develop the estimates had changed.] *[Describe terms and conditions of the contingent purchase consideration: (i) description of the arrangement and the basis for determining the amount of the payment; (ii) an estimate of the range of outcomes (undiscounted) or, if a range cannot be estimated, that fact and the reasons why a range cannot be estimated. If the maximum amount of the payment is unlimited, the acquirer shall disclose that fact.]*

Acquisition related transaction costs of EUR \_\_\_\_ thousand were expensed as general and administrative expenses. The contractual acquisition arrangement included remuneration of EUR \_\_\_\_ thousand for future services of the former owner. This amount was separated and will be expensed as staff costs over a period of three years from acquisition. *[For transactions that are recognised separately from the acquisition of assets and assumption of liabilities in the business combination in accordance with paragraph 51 of IFRS 3 disclose: (i) a description of each transaction; (ii) how the acquirer accounted for each transaction; (iii) the amounts recognised for each transaction and the line item in the financial statements in which each amount is recognised; and (iv) if the transaction is the effective settlement of a pre-existing relationship, the method used to determine the settlement amount.]*

52 Business Combinations (Continued)

The consideration paid by the Group was based on results of an external appraisal [by an internationally recognised investment bank] of the acquiree’s business taken as a whole. However, in accordance with IFRS 3 “Business Combinations”, the Group must account for acquisitions based on fair values of the identifiable assets acquired, and liabilities and contingent liabilities assumed. These two different approaches can lead to differences; and, as set out in the table below, recognition of [goodwill] [*or* the excess of the net fair value of the acquiree’s identifiable assets, liabilities and contingent liabilities over cost (“negative goodwill”) immediately in profit or loss for the year (as ‘excess of the net fair value of the acquiree’s identifiable assets, liabilities and contingent liabilities over cost of the business combination’)].

Details of the assets and liabilities acquired and goodwill arising are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **Note** | **Attributed**  **fair value** |
|  |  |  |
| Cash and cash equivalents |  |  |
| Loans and advances to customers |  |  |
| Other financial assets |  |  |
| Other assets |  |  |
| Customer accounts |  |  |
| Contingent tax exposures |  |  |
| Other liabilities |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| **Fair value of identifiable net assets of subsidiary** |  |  |
| Less: non-controlling interest |  |  |
| Goodwill arising from the acquisition | [17](#_heading=h.3as4poj) |  |
|  |  |  |
|  |  |  |
| **Total purchase consideration and previously held interest in the acquiree** |  |  |
| Less: Non-cash consideration | [26](#_heading=h.41mghml) |  |
| Less: Cash and cash equivalents of subsidiary acquired |  |  |
|  |  |  |
|  |  |  |
| **Outflow of cash and cash equivalents on acquisition** |  |  |
|  |  |  |

The non-controlling interest represents share in net assets of the acquiree attributable to owners of non-controlling interest. [*Alternatively*: The non-controlling interest was measured at its market value. The fair value of the non-controlling interest was estimated by applying an income approach. The fair value estimates are based on: (a) an assumed discount rate range of [\_\_\_\_–\_\_\_\_] per cent; (b) an assumed terminal value based on a range of terminal EBITDA multiples between [\_\_\_\_ and \_\_\_\_] times; (c) assumed financial multiples of companies deemed to be similar to the acquiree; and (d) assumed adjustments because of the lack of control or lack of marketability that market participants would consider when estimating the fair value of the non-controlling interest.] *[if a valuation technique was used, disclose it and the key model inputs used for determining that fair value]*.

The fair values of assets and liabilities acquired are based on [discounted cash flow models]. The valuation of identifiable intangible assets was performed by an independent professional appraiser. Based on the appraisal report, the following items were included in the purchase price allocation:

* [core deposits intangibles valued at EUR \_\_\_\_ thousands;]
* [brand name valued at EUR \_\_\_\_ thousands; and]
* [proprietary software valued at EUR \_\_\_\_ thousands.]

The fair value of the acquired identifiable intangible assets of EUR \_\_\_\_\_ thousand is provisional pending receipt of the final valuations for those assets.

52 Business Combinations (Continued)

For each class of acquired receivables, the gross contractual amounts receivable and the best estimate of the contractual cash flows not expected to be collected are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **Gross contractual amounts receivable** | **The contractual cash flows not expected to be collected** |
|  |  |  |
| ***Loans and advances to customers*** |  |  |
| - Corporate loans |  |  |
| - Loans to individuals ‒ consumer loans |  |  |
| - Loans to individuals ‒ entrepreneurs |  |  |
| - Mortgage loans |  |  |
| - Reverse sale and repurchase agreements |  |  |
| - State and municipal organisations |  |  |
| ***Other financial assets:*** |  |  |
| - Trade receivables |  |  |
| - Finance lease receivables |  |  |
| - Credit and debit cards receivables |  |  |
| - Settlements on conversion operations |  |  |
|  |  |  |
|  |  |  |
| **Total** |  |  |
|  |  |  |

Contingent tax exposures are attributable to [transfer pricing tax risks] and expire within [three] years from acquisition. Refer to Note 43. *[If a contingent liability is not recognised because its fair value cannot be measured reliably, the acquirer shall disclose: (i) the information required by paragraph 86 of IAS 37; and (ii) the reasons why the liability cannot be measured reliably.]*

The goodwill is primarily attributable to the profitability of the acquired business, the significant synergies and combined cost savings expected to arise. *[The requirement is to disclose description of factors that make up the goodwill.]* The goodwill will not be deductible for tax purposes in future periods.

The acquired subsidiary contributed revenue of EUR \_\_\_\_\_ thousand and profit of EUR \_\_\_\_\_ thousand to the Group for the period from the date of acquisition to 31 December 2024. If the acquisition had occurred on 1 January 2024, Group revenue for 2024 would have been EUR \_\_\_\_\_ thousand, and profit for 2024 would have been EUR \_\_\_\_\_ thousand.

# Events after the End of the Reporting Period

***Russian invasion of Ukraine.*** *[Provide description of events and developments of the situation in Ukraine after the reporting date affecting the Group’s operations, if relevant.]*

***Dividends.*** Management proposed to the [Annual General Meeting of Shareholders] a dividend on ordinary shares in the amount of EUR\_\_\_\_\_ thousand (EUR\_\_\_\_\_ per ordinary share) and a dividend on preference shares in the amount of EUR\_\_\_\_\_ thousand (EUR\_\_\_\_\_ per preference share or \_\_\_\_\_% of the nominal value of the underlying preference shares). [On \_\_\_\_\_2024 an [Annual General Meeting of Shareholders] declared a dividend on ordinary shares in the amount of EUR\_\_\_\_\_ thousand (EUR\_\_\_\_\_ per ordinary share) and a dividend on preference shares in the amount of EUR\_\_\_\_\_ thousand (EUR\_\_\_\_\_ per preference share or \_\_\_\_\_% of the nominal value of the underlying preference shares).]

53 Events after the End of the Reporting Period (Continued)

***Business combinations.*** *[If the acquisition date of a business combination is after the end of the reporting period but before the financial statements are authorised for issue, the acquirer shall disclose the information required by paragraph B64 of IFRS 3 unless the initial accounting for the business combination is incomplete at the time the financial statements are authorised for issue. In that situation, the acquirer shall describe which disclosures could not be made and the reasons why they cannot be made.]* On \_\_\_\_\_ 2024, the Group acquired \_\_\_\_\_% of the share capital of \_\_\_\_\_ and obtained control through its ability to cast a majority of votes in the general meeting of shareholders *[requirement is to describe how acquirer obtained control]*. The acquired subsidiary will increase the Group’s penetration of its chosen retail and corporate markets and is expected to improve profitability through the economies of scale *[requirement is to disclose reason for the business combination]*.

The acquisition-date fair value of the total purchase consideration and its components are as follows:

|  |  |
| --- | --- |
| *In thousands of EUR* |  |
|  |  |
| Cash consideration paid |  |
| Fair value of new issued shares of the acquirer |  |
| Tangible or intangible assets of acquirer transferred |  |
| Liability for contingent consideration incurred |  |
|  |  |
|  |  |
| **Total consideration transferred** |  |
|  |  |
|  |  |
| Less remuneration for future services of the former owner |  |
| Less indemnification asset |  |
| Investment in the acquiree prior to the acquisition |  |
|  |  |
|  |  |
| **Total purchase consideration and previously held interest in the acquire** |  |
|  |  |

The investment in the acquiree held prior to the acquisition was remeasured to its fair value at the acquisition date, and a gain of EUR \_\_\_\_ thousand was recognised in gains less losses on disposal of [associates]. The fair value of the new issued shares of the acquirer was determined on the basis of the closing market price of the ordinary shares on the acquisition date.

[The contingent consideration arrangement requires the Group to pay the former owners of the acquiree \_\_\_\_ per cent of the revenues of an unconsolidated equity investment owned by the acquiree, in excess of EUR \_\_\_\_ thousand for 2024, up to a maximum amount of EUR \_\_\_\_\_ thousand (undiscounted). The potential undiscounted amount of all future payments that the Group could be required to make under the contingent consideration arrangement is between EUR \_\_\_\_\_ thousand and EUR \_\_\_\_\_ thousand. The fair value of the contingent consideration arrangement of EUR \_\_\_\_\_ thousand was estimated by applying the income approach. The fair value estimates are based on an assumed discount rate range of \_\_\_\_–\_\_\_\_ per cent and assumed probability-adjusted revenues in equity investee of EUR \_\_\_\_\_ thousand to EUR \_\_\_\_\_ thousand.] *[Describe terms and conditions of the contingent purchase consideration: (i) description of the arrangement and the basis for determining the amount of the payment; (ii) an estimate of the range of outcomes (undiscounted) or, if a range cannot be estimated, that fact and the reasons why a range cannot be estimated. If the maximum amount of the payment is unlimited, the acquirer shall disclose that fact.]*

Acquisition related transaction costs of EUR \_\_\_\_ thousand were expensed as general and administrative expenses. The contractual acquisition arrangement included remuneration of EUR \_\_\_\_ thousand for future services of the former owner. This amount was separated and will be expensed as staff costs over a period of three years from acquisition. *[For transactions that are recognised separately from the acquisition of assets and assumption of liabilities in the business combination in accordance with paragraph 51 of IFRS 3 disclose: (i) a description of each transaction; (ii) how the acquirer accounted for each transaction; (iii) the amounts recognised for each transaction and the line item in the financial statements in which each amount is recognised; and (iv) if the transaction is the effective settlement of a pre-existing relationship, the method used to determine the settlement amount.]*

53 Events after the End of the Reporting Period (Continued)

The consideration paid by the Group was based on results of an external appraisal [by an internationally recognised investment bank] of the acquiree’s business taken as a whole. However, in accordance with IFRS 3 “Business Combinations”, the Group must account for acquisitions based on fair values of the identifiable assets acquired, and liabilities and contingent liabilities assumed. These two different approaches can lead to differences; and, as set out in the table below, recognition of [goodwill] [*or* the excess of the net fair value of the acquiree’s identifiable assets, liabilities and contingent liabilities over cost (“negative goodwill”) immediately in profit or loss for the year (as ‘excess of the net fair value of the acquiree’s identifiable assets, liabilities and contingent liabilities over cost of the business combination’)].

Details of the assets and liabilities acquired and goodwill arising are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **Note** | **Attributed**  **fair value** |
|  |  |  |
| Cash and cash equivalents |  |  |
| Loans and advances to customers |  |  |
| Other financial assets |  |  |
| Other assets |  |  |
| Customer accounts |  |  |
| Contingent tax exposures |  |  |
| Other liabilities |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| **Fair value of identifiable net assets of subsidiary** |  |  |
| Less: non-controlling interest |  |  |
| Goodwill arising from the acquisition | 17 |  |
|  |  |  |
|  |  |  |
| **Total purchase consideration and previously held interest in the acquiree** |  |  |
| Less: Non-cash consideration (items as disclosed above) |  |  |
| Less: Cash and cash equivalents of subsidiary acquired |  |  |
|  |  |  |
|  |  |  |
| **Outflow of cash and cash equivalents on acquisition** |  |  |
|  |  |  |

The non-controlling interest represents a share in net assets of the acquiree attributable to the owners of the non-controlling interest. [The non-controlling interest was measured at its market value. The fair value of the non-controlling interest was estimated by applying an income approach. The fair value estimates are based on: (a) an assumed discount rate range of [\_\_\_\_–\_\_\_\_] per cent; (b) an assumed terminal value based on a range of terminal EBITDA multiples between [\_\_\_\_ and \_\_\_\_] times; (c) assumed financial multiples of companies deemed to be similar to the acquiree; and (d) assumed adjustments because of the lack of control or lack of marketability that market participants would consider when estimating the fair value of the non-controlling interest.] *[if a valuation technique was used, disclose it and the key model inputs used for determining that fair value]*.

The fair values of assets and liabilities acquired are based on [discounted cash flow models]. The valuation of identifiable intangible assets was performed by an independent professional appraiser. Based on the appraisal report, the following items were included in the purchase price allocation:

* [core deposits intangibles valued at EUR \_\_\_\_ thousands;]
* [brand name valued at EUR \_\_\_\_ thousands; and]
* [proprietary software valued at EUR \_\_\_\_ thousands.]

The fair value of the acquired identifiable intangible assets of EUR \_\_\_\_\_ thousand is provisional pending receipt of the final valuations for those assets.

53 Events after the End of the Reporting Period (Continued)

For each class of acquired receivables, the gross contractual amounts receivable and the best estimate of the contractual cash flows not expected to be collected are as follows:

|  |  |  |
| --- | --- | --- |
| *In thousands of EUR* | **Gross contractual amounts receivable** | **The contractual cash flows not expected to be collected** |
|  |  |  |
| ***Loans and advances to customers*** |  |  |
| - Corporate loans |  |  |
| - Loans to individuals ‒ consumer loans |  |  |
| - Loans to individuals ‒ entrepreneurs |  |  |
| - Mortgage loans |  |  |
| - Reverse sale and repurchase agreements |  |  |
| - State and municipal organisations |  |  |
| ***Other financial assets:*** |  |  |
| - Trade receivables |  |  |
| - Finance lease receivables |  |  |
| - Credit and debit cards receivables |  |  |
| - Settlements on conversion operations |  |  |
|  |  |  |
|  |  |  |
| **Total** |  |  |
|  |  |  |

Contingent tax exposures are attributable to [transfer pricing tax risks] and expire within [three] years from acquisition. Refer to Note 43. *[If a contingent liability is not recognised because its fair value cannot be measured reliably, the acquirer shall disclose: (i) the information required by paragraph 86 of IAS 37; and (ii) the reasons why the liability cannot be measured reliably.]*

The goodwill is primarily attributable to the profitability of the acquired business, the significant synergies and combined cost savings expected to arise. *[The requirement is to disclose description of factors that make up the goodwill.]* The goodwill will not be deductible for tax purposes in future periods.

***Non-current assets held for sale (or disposal groups).*** After the end of the reporting period, the Group reclassified assets which had a carrying value of EUR \_\_\_\_\_ thousand, to non-current assets held for sale (or disposal groups). Management approved a plan to sell \_\_\_\_\_ assets on \_\_\_\_\_ due to \_\_\_\_\_. The Group is actively marketing these assets and expects the sale to complete by \_\_\_\_\_2024. *[Describe facts and circumstances, expected manner and timing of that disposal]*

The reclassified assets belong to the [Retail] [Corporate] [Investment] banking segment operating in [Europe] [the United States of America].

***Refinancing.*** *[Disclose post-balance sheet (a) refinancing of loans on a long-term basis; (b) rectification of a breach of a long-term loan agreement; and (c) the receipt from the lender of a period of grace to rectify a breach of a long-term loan agreement ending at least twelve months after the end of the reporting period. Refer to IAS 1.67.]*

***Transactions with shareholders.*** *[Provide a description of ordinary share transactions or potential ordinary share transactions, other than those accounted for in accordance with IAS 33.64, that occur after the end of the reporting period and that would have changed significantly the number of ordinary shares or potential ordinary shares outstanding at the end of the period if those transactions had occurred before the end of the reporting period. Refer to IAS 33.70]*

*[Consider descriptions of other significant subsequent events. If subsequent event is disclosed elsewhere in the notes then reference to the respective note needs to be made from the subsequent events note.]*

# Abbreviations

The list of the abbreviations used in these consolidated financial statements is provided below:

|  |  |
| --- | --- |
| Abbreviation | Full name |
|  |  |
| AC | Amortised Cost |
| ADR | American Depository Receipt |
| CCF | Credit Conversion Factor |
| CRR | Capital Requirements Regulation |
| EAD | Exposure at Default |
| ECB | European Central Bank |
| 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 |
| GDR | Global Depository Receipt |
| IASB | International Accounting Standards Board |
| IFRS | International Financial Reporting Standard |
| IRB system | Internal Risk-Based system |
| L&R | Loans and Receivables |
| LGD | Loss Given Default |
| LTV | Loan to Value |
| NBC | National Bank of [Country] |
| 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 SPPI |
|  |  |
|  |  |
|  |  |

**Ask secretaries to help you with formatting the document:**

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* Note that all comments in brackets or written in Italic font should be removed or included as appropriate.

**Applicable version of IFRS standards**

These pro forma financial statements are based on IFRS, effective for the financial statements covering reporting year ending 31 December 2024. Early adoption of the standards or interpretations listed in Note 6 is not assumed.

**First-time adoption note**

These illustrative financial statements are for an existing preparer. A first-time adopter would have to replace Note 5 with IFRS 1 disclosures.

**Disclaimer and key events or transactions that are not covered**

These pro forma financial statements are not a substitute for reading the Standards and Interpretations themselves or for professional judgement as to fairness of presentation. They do not cover, for example:

* Hedge accounting;
* Discontinued operations;
* Embedded derivatives;
* Defined benefit plans;
* Share-based payments;
* Joint arrangements;
* Presentation of financial statements of companies with puttable shares;

and other possible disclosures required by IFRS. Depending on the circumstances, further specific information may be required in order to ensure fair presentation under IFRS and we recommend that reference is made to separate publications:

* IFRS Disclosure Checklist (published on viewpoint.pwc.com);
* IFRS Illustrative Bank Financial Statements;
* IFRS Illustrative Corporate Financial Statements;
* IFRS Illustrative Financial Statements ‒ Investment Funds;
* Illustrative Consolidated Financial Statements ‒ Investment Property;
* IFRS Illustrative Consolidated Financial Statements – Insurance.

Use of these pro forma financial statements does not exempt from completion of the IFRS disclosure checklist.

***Investment property.*** Investment property is property held by the Group to earn rental income or for capital appreciation, or both, and is not occupied by the Group.

[Land held under a lease is classified and accounted for by the Group as investment property when the rest of the definition of investment property is met.]

*[Tailor to reflect the actual sources used by the Group/their external valuer:]* Investment property is initially recognised at cost, including transaction costs, and subsequently remeasured at fair value updated to reflect market conditions at the end of the reporting period. Fair value of investment property is the price at which the property could be sold in an orderly transaction in the principal market. An orderly transaction is not a forced transaction or a distress sale. The best evidence of fair value is given by current prices in an active market for similar property in the same location and condition. In the absence of current prices in an active market, the Group considers information from a variety of sources, including:

1. current prices in an active market for properties of different nature, condition or location, adjusted to reflect those differences;
2. recent prices of similar properties on less active markets, with adjustments to reflect any changes in economic conditions since the date of the transactions that occurred at those prices; and
3. discounted cash flow projections based on reliable estimates of future cash flows, supported by the terms of any existing lease and other contracts and (when possible) by external evidence such as current market rents for similar properties in the same location and condition, and using discount rates that reflect current market assessments of the uncertainty in the amount and timing of the cash flows.

[If, in exceptional cases, there is clear evidence when the Group first acquires an investment property (or when an existing property first becomes investment property following a change in use) that the fair value of the investment property is not reliably determinable on a continuing basis, then the Group measures that investment property using the cost model in IAS 16 *[expand further if the Group has had to apply this rule].]*

***Investment properties.*** The fair value of the Group’s investment property is determined based on reports of independent appraisers, who hold a recognised and relevant professional qualification, and who have had recent experience of the valuation of property in similar locations and of similar category. *[If the valuation is done by the entity’s staff, amend wording accordingly and disclose that professional valuers were not involved – see IAS 40.75(e).]*

[If a valuation obtained for a property is net of all payments expected to be made, any related lease liability recognised separately in the statement of financial position is added back to arrive at the carrying value of the investment property for accounting purposes.]

[Investment property that is being developed or redeveloped for use as investment property is also measured at fair value.]

Earned rental income is recorded in profit or loss for the year within [other operating income]. Gains and losses resulting from changes in the fair value of investment property are recorded in profit or loss for the year and presented separately. [Gains or losses on disposal of investment property are calculated as proceeds less carrying amount. Where the Group disposes of a property at fair value in an arm’s length transaction, the carrying value immediately prior to the sale is adjusted to the transaction price, and the adjustment is recorded in profit or loss for the year within net gain from fair value adjustment on investment property.]

[In certain circumstances the Group may dispose of a property other than at fair value, such as when there are special terms or circumstances allowing the parties to the transaction to obtain a benefit which would not generally be available to other market participants. In such circumstances, the carrying value immediately prior to the sale is adjusted to the estimated fair value at the disposal date, and any difference between proceeds and the carrying amount is recorded separately in profit or loss for the year within realised gains or losses on disposal of the investment property.]

[If an investment property becomes owner-occupied, it is reclassified as property, plant and equipment, and its carrying amount at the date of reclassification becomes its deemed cost for accounting purposes.]

[If an item of owner-occupied property becomes an investment property because its use has changed, any difference resulting between the carrying amount and the fair value of this item at the date of transfer is treated in the same way as a revaluation under IAS 16. Any resulting increase in the carrying amount of the property is recognised in profit or loss for the year to the extent that it reverses a previous credit loss, with any remaining increase credited directly to other comprehensive income. Any resulting decrease in the carrying amount of the property is initially charged against any revaluation surplus previously recognised in other comprehensive income, with any remaining decrease charged to profit or loss for the year.]

Subsequent expenditure is capitalised to the asset’s carrying amount only when it is probable that future economic benefits associated with the expenditure will flow to the Group, and the cost can be measured reliably. All other repairs and maintenance costs are expensed when incurred.

***[Alternative policy ‒ cost model:***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. A credit 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.

Subsequent expenditure is capitalised only when it is probable that future economic benefits associated with it will flow to the Group, and the cost can be measured reliably. All other repairs and maintenance costs are expensed when incurred. If an investment property becomes owner-occupied, it is reclassified to premises and equipment.