JSC Silk Road Bank

Financial Statements
for 2020

Contents

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Independent Auditors' Report

To the Shareholders and Board of Directors of JSC Silk Road Bank

Opinion

We have audited the financial statements of JSC Silk Road Bank (the "Bank"), which comprise the statement of financial position as at 31 December 2020, the statements of profit or loss and other comprehensive income, changes in equity and cash flows for the year then ended, and notes, comprising significant accounting policies and other explanatory information.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Bank as at 31 December 2020, and its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS).

Basis for Opinion

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

Material Uncertainty Related to Going Concern

We draw attention to note 2 to the financial statements which indicates that in 2020 the Bank has reported operating loss of GEL 1,070 thousand, accumulated loss as at 31 December 2020 amounted to GEL 7,834 thousand and the Bank is in a breach of the minimum regulatory capital requirement imposed by the National Bank of Georgia. These events and conditions, along with the other matters explained in note 2, indicate that a material uncertainty exists that may cast significant doubt on the Bank's ability to continue as a going concern. Our opinion is not modified in respect of this matter.

Statement on Management Report

Management is responsible for the Management Report. The Management Report is expected to be made available to us after the date of this auditors' report.

Our opinion on the financial statements does not cover the Management Report and we will not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the Management Report when it becomes available and, in doing so, consider whether the Management Report is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. When we read the Management Report, we conclude whether the other information:

- is consistent with the financial statements and does not contain material misstatement;
- contains all information that is required by and is compliant with the Law of Georgia on Accounting, Reporting and Auditing.

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

Management is responsible for the preparation and fair presentation of the financial statements in accordance with IFRS, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

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

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

Auditors' Responsibilities for the Audit of the Financial Statements

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

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

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

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

The engagement partner on the audit resulting in this independent auditors' report is:

Natia Tevzadze

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KPMG Georgia LLC
Tbilisi, Georgia
13 May 2021

GEL'000	Notes	2020	2019
Interest income calculated using the effective interest method	5	5,652	5,006
Interest expense	5	(1,367)	(291)
Net interest income		**4,285**	**4,715**
Fee and commission income		354	463
Fee and commission expense		(86)	(129)
Net fee and commission income		**268**	**334**
Net gain from foreign currency dealings and forward contracts	20	348	839
Net foreign currency revaluation (loss)/ gain		(81)	323
Impairment reversal/(loss) on the assets held for sale		544	(74)
Net gain/(loss) from disposal of assets held for sale		10	(122)
Net modification loss		(106)	-
Impairment loss on debt financial assets and loan commitments, net	4	(744)	(1,208)
General administrative expenses	6	(2,652)	(3,149)
Salaries and employment benefits expenses	7	(2,913)	(2,368)
Other (expense)/ income		(40)	62
Loss before income tax		**(1,081)**	**(648)**
Income tax benefit	8	11	184
Loss for the year		**(1,070)**	**(464)**
Other comprehensive income			
Items that will never be reclassified to profit or loss			
Revaluation of land and buildings	13	1,273	1,402
Income tax relating to components of other comprehensive income	8	-	(210)
Total other comprehensive income		**1,273**	**1,192**
Total comprehensive income for the year		**203**	**728**

The financial statements as set out on pages 5 to 51 were approved by management on 13 May 2021 and were signed on its behalf by:

Eli Enoch
Chief Executive Officer

Beka Kvezereli
Deputy Chief Executive Officer

The statement of profit or loss and other comprehensive income is to be read in conjunction with the notes to, and forming part of, the financial statements.

GEL'000	**Notes**	**31 December 2020**	**31 December 2019**
ASSETS			
Cash and cash equivalents	9	5,631	21,064
Amounts due from credit institutions	10	1,171	2,991
Investment securities	11	41,902	19,967
Loans to customers	12	10,943	13,147
Property and equipment	13	20,805	19,128
Intangible assets		29	36
Assets held for sale	12	3,740	3,687
Other assets	20	3,273	1,873
Total assets		**87,494**	**81,893**
LIABILITIES			
Loans from credit institutions	15	12,500	-
Current accounts and deposits from customers	14	7,540	17,919
Certificate of deposits	15	1,866	-
Deferred tax liabilities	8	149	160
Other liabilities		2,486	1,064
Total liabilities		**24,541**	**19,143**
EQUITY	16		
Share capital		61,146	61,146
Reserves		9,641	8,368
Accumulated loss		(7,834)	(6,764)
Total equity		**62,953**	**62,750**
Total liabilities and equity		**87,494**	**81,893**

The statement of financial position is to be read in conjunction with the notes to, and forming part of, the financial statements.

GEL'000	**Notes**	**2020**	**2019***
CASH FLOWS FROM OPERATING ACTIVITIES			
Profit/(Loss)		(1,070)	(464)
Adjustments for:			
Net impairment loss on loans and advances		668	1,122
Depreciation and amortisation		448	553
Net modification loss		106	-
Written off assets held for sale		89	-
Net foreign currency revaluation gain/(loss)		81	(323)
Net impairment loss on investment securities		76	86
Net interest income		(4,285)	(4,715)
Forward exchange contracts		(1,375)	(720)
Impairment (reversal)/loss on the asset held for sale		(544)	74
Net (gain)/loss from disposal of assets held for sale		(10)	122
Tax expense		(11)	(184)
		(5,827)	**(4,449)**
Changes in:			
Loans to customers		2,279	1,975
Amounts due from credit institutions		2,277	(673)
Other assets		(385)	(47)
Deposits from customers		(10,399)	4,424
Other liabilities and provisions		(73)	438
		(12,128)	**1,668**
Interest received		5,190	4,276
Interest paid		(1,388)	(282)
Net cash flows (used in)/ from operations		**(8,326)**	**5,662**
CASH FLOWS FROM INVESTING ACTIVITIES			
Proceeds from repayment of investment securities		1,000	1,000
Proceeds from sale of assets held for sale		31	1,116
Purchases of investment securities		(22,785)	(7,248)
Purchase of property plant and equipment		(451)	(84)
Acquisition of intangible assets		(23)	-
Net cash flows used in investing activities		**(22,228)**	**(5,216)**
CASH FLOWS FROM FINANCING ACTIVITIES			
Proceeds from borrowed funds	15	199,276	-
Proceeds from issue of certificate of deposits	15	1,855	-
Repayment of borrowed funds	15	(186,776)	-
Net cash flows from financing activities		**14,355**	**-**
Net (decrease)/increase in cash and cash equivalents		**(16,199)**	**446**
Cash and cash equivalents as at the beginning of the year		21,064	20,073
Effect of changes in exchange rates on cash and cash equivalents		766	545
Cash and cash equivalents as at the end of the year	**9**	**5,631**	**21,064**

* In 2020, the presentation of the statement of cash flows was changed from direct to indirect method. The comparative financial information was represented accordingly.

The statement of cash flows is to be read in conjunction with the notes to, and forming part of, the financial statements.

GEL'000	Share capital	Revaluation reserve of property and equipment	Accumulated loss	Total equity
Balance as at 1 January 2019	**61,146**	**7,322**	**(6,446)**	**62,022**
Total comprehensive income/ (loss)				
Loss for the year	-	-	(464)	(464)
Other comprehensive income/(loss)				
Revaluation of land and buildings	-	1,402	-	1,402
Deferred tax effect	-	(210)	-	(210)
Depreciation of revaluation reserve, net of tax	-	(146)	146	-
Total other comprehensive income	**-**	**1,046**	**146**	**1,192**
Total comprehensive income/(loss)	**-**	**1,046**	**(318)**	**728**
Balance as at 31 December 2019	**61,146**	**8,368**	**(6,764)**	**62,750**
Balance as at 1 January 2020	**61,146**	**8,368**	**(6,764)**	**62,750**
Total comprehensive income/(loss)				
Loss for the year	-	-	(1,070)	(1,070)
Other comprehensive income				
Revaluation of land and buildings	-	1,273	-	1,273
Total other comprehensive income	**-**	**1,273**	**-**	**1,273**
Total comprehensive (loss)/income	**-**	**1,273**	**(1,070)**	**203**
Balance as at 31 December 2020	**61,146**	**9,641**	**(7,834)**	**62,953**

The statement of changes in equity is to be read in conjunction with the notes to, and forming part of, the financial statements.

1. Background

(a) Organisation and operations

JSC Silk Road Bank (the "Bank") is a Georgian joint stock company.

The Bank accepts deposits from the public and extends credit, transfers payments in Georgia and abroad, exchanges currencies and provides other banking services to its corporate and retail customers. The Bank's registered legal address is 2, Zaarbrukeni Square, Tbilisi, Georgia. The Bank is regulated by the National Bank of Georgia (the "NBG"; the central bank of Georgia) and conducts the business under license number 238.

Tax identification number of the Bank is 201955027 and the registering authority is Didube-Chugureti district court.

As at 31 December 2020 and 2019, the shareholders of the Bank are as follows:

	Ownership %	
Name	**2020**	**2019**
Silk Road Group Holding (Malta) Limited	99.99	-
Silk Road Finance Group JSC	-	99.99
Other	0.01	0.01
Total	**100.00**	**100.00**

On 11 May 2020, ultimate parent company, Silk Road Group Holding (Malta) Limited, purchased 99.99% shares of the Bank from Silk Road Finance Group JSC and, as a result, became direct parent of the Bank.

The Bank is ultimately controlled by Mr. Giorgi Ramishvili, a Georgian businessman, who has a number of business interests outside the Bank. Related party transactions are disclosed in Note 17.

(b) Business environment

The Bank's operations are primarily located in Georgia. Consequently, the Bank is exposed to the economic and financial markets of Georgia, which display characteristics of an emerging market. The legal, tax and regulatory frameworks continue development, but are subject to varying interpretations and frequent changes which together with other legal and fiscal impediments contribute to the challenges faced by entities operating in Georgia. The COVID-19 coronavirus pandemic has further increased uncertainty in the business environment.

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

2. Basis of preparation

(a) Statement of compliance

The accompanying financial statements are prepared in accordance with International Financial Reporting Standards (IFRS).

(b) Basis of measurement

The financial statements are prepared on the historical cost basis except that derivative financial instruments and land and buildings, which are carried at fair value and assets held for sale, which are stated at lower of carrying value and fair value less costs to sell.

(c) Going concern

The financial statements are prepared on a going concern basis notwithstanding that the Bank has reported an operating loss of GEL 1,070 thousand for the year to 31 December 2020 (2019: operating loss of GEL 464 thousand) and at 31 December 2020 and as of now the Bank is in a breach of the minimum regulatory capital requirement imposed by the National Bank of Georgia (see note 22). The minimum regulatory capital requirement was breached two times, first by end of March 2020 and recovered later and again from December 2020. The Bank has been waived by NBG, till 31 December 2020, at initial breach, and, then till 30 June 2021.

Whilst the directors have instituted several measures for the Bank to grow internally and to preserve additional finances, the nature of the Bank's business and current economic situation is such that there can be considerable unpredictable variation in the timing of cash inflows. Hence, to meet the minimum regulatory capital requirement on 30 June 2021 (NBG waiver date), the directors place its reliance on the planned capital injection from the Bank's parent company, Silk Road Group (Malta) Limited. Silk Road Group (Malta) Limited has indicated its intention to continue to make available such funds as are needed by the Bank to meet its regulatory requirements and continue operations. As with any company placing reliance on other group entities for financial support, the directors acknowledge that there can be no certainty that this support will continue although, at the date of approval of these financial statements, they have no reason to believe that it will not do so. However, intention and ability of Silk Road Group (Malta) Limited to continue to provide immediate support till 30 June 2021 and then on a continuous basis until the Bank stabilizes its operations, is dependent on factors outside the control of the directors.

Based on the above indications the directors believe that it remains appropriate to prepare the financial statements on a going concern basis. However, this material uncertainty may cast significant doubt on the Bank's ability to continue as a going concern and, therefore, to continue realizing its assets and discharging its liabilities in the normal course of business. The financial statements do not include any adjustments that would result from the basis of preparation being inappropriate.

(d) Functional and presentation currency

The national currency of Georgia is the Georgian Lari ("GEL"), which is the Bank's functional currency and the currency in which these financial statements are presented.

All financial information presented in GEL has been rounded to the nearest thousands, except when otherwise indicated.

(e) Use of estimates and judgments

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

Estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimates are revised and in any future periods affected.

Information about critical judgements made in applying accounting policies that have the most significant effect on the amounts recognised in the financial statements is included in the following note:

- Note 2 (c) – going concern assessment;
- Note 3(e)(vi) and Note 4 - establishing the criteria for determining whether credit risk on the financial asset has increased significantly since initial recognition, determining methodology for incorporating forward-looking information into measurement of ECL and selection and approval of models used to measure ECL.

Information about assumptions and estimation uncertainties that have a significant risk of resulting in a material adjustment to the carrying amounts of assets and liabilities in the year ended 31 December 2020 is included in the following notes:

- Note 4 - impairment of financial instruments: determining inputs into the ECL measurement model, including key assumptions used in estimating recoverable cash flows and incorporation of forward-looking information;
- Note 13 - valuation of land and buildings.

3. Significant accounting policies

The Bank has consistently applied the following accounting policies to all periods presented in these financial statements.

(a) Foreign currency transactions

Transactions in foreign currencies are translated to the functional currency of the Bank at exchange rates at the dates of the transactions.

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

Non-monetary assets and liabilities denominated in foreign currencies that are measured at fair value are translated to the functional currency at the exchange rate of the date when the fair value is determined. Non-monetary items that are measured based on historical cost in a foreign currency are translated at the exchange rate at the date of the transaction. Foreign currency differences arising on translation are recognized in profit or loss.

(b) Interest

Effective interest rate

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

- the gross carrying amount of the financial asset; or
- the amortised cost of the financial liability.

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

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

Amortised cost and gross carrying amount

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

The 'gross carrying amount of a financial asset' measured at amortised cost is the amortised cost of a financial asset before adjusting for any expected credit loss allowance.

Calculation of interest income and expense

The effective interest rate of a financial asset or financial liability is calculated on initial recognition of a financial asset or a financial liability. In calculating interest income and expense, the effective interest rate is applied to the gross carrying amount of the asset (when the asset is not credit-impaired) or to the amortised cost of the liability. The effective interest rate is revised as a result of periodic re-estimation of cash flows of floating-rate instruments to reflect movements in market rates of interest.

However, for financial assets that have become credit-impaired subsequent to initial recognition, interest income is calculated by applying the effective interest rate to the amortised cost of the financial asset. If the asset is no longer credit-impaired, then the calculation of interest income reverts to the gross basis.

For financial assets that were credit-impaired on initial recognition, interest income is calculated by applying the credit-adjusted effective interest rate to the amortised cost of the asset. The calculation of interest income does not revert to a gross basis, even if the credit risk of the asset improves.

For information on when financial assets are credit-impaired, see Note 3(e)(vii).

Presentation

Interest income calculated using the effective interest method presented in the statement of profit or loss and other comprehensive income includes interest on financial assets measured at amortised cost.

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

(c) Fees and commission

Fee and commission income and expense that are integral to the effective interest rate on a financial asset or financial liability are included in the effective interest rate (see Note 3(b)).

If a loan commitment is not expected to result in the draw-down of a loan, then the related loan commitment fee is recognised on a straight-line basis over the commitment period.

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

Fees and commission income for ongoing account management are charged to the customer's account on a monthly basis. Transaction-based fees for interchange, foreign currency transactions and overdrafts are charged to the customer's account when the transaction takes place. Servicing fees are charged on a monthly basis and are based on fixed rates reviewed annually by the Bank. Income from account service and servicing fees is recognised over time as the services are provided. Income related to transactions is recognised at the point in time when the transaction takes place.

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

(d) Taxation

Income tax comprises current and deferred tax. Income tax is recognized in profit or loss except to the extent that it relates to items of other comprehensive income or transactions with shareholders recognized directly in equity, in which case it is recognized within other comprehensive income or directly within equity.

i. Current tax

Current tax expense is the expected tax payable on the taxable income for the year, using tax rates enacted or substantially enacted at the reporting date, and any adjustment to tax payable in respect of previous years. Current tax payable also includes any tax liability arising from dividends.

On 13 May 2016 the Parliament of Georgia passed the bill on corporate income tax reform (also known as the Estonian model of corporate taxation), which mainly moves the moment of taxation from when taxable profits are earned to when they are distributed. The law has entered into force in 2016 and is effective for tax periods starting after 1 January 2017 for all entities except for financial institutions (such as banks, insurance companies, microfinance organizations, pawnshops), for which the law will become effective from 1 January 2023.

The new system of corporate income taxation does not imply exemption from Corporate Income Tax (CIT), rather CIT taxation is shifted from the moment of earning the profits to the moment of their distribution; i.e. the main tax object is distributed earnings. The Tax Code of Georgia defines Distributed Earnings (DE) to mean profit distributed to shareholders as a dividend. However some other transactions are also considered as DE, for example non-arm's length cross-border transactions with related parties and/or with persons exempted from tax are also considered as DE for CIT purposes. In addition, the tax object includes expenses or other payments not related to the entity's economic activities, free of charge supply and over-limit representative expenses.

Tax reimbursement is available for the current tax paid on the undistributed earnings in the years 2008-2017, if those earnings are distributed in 2019 or further years.

The corporate income tax arising from the payment of dividends is accounted for as an expense in the period when dividends are declared, regardless of the actual payment date or the period for which the dividends are paid.

ii. Deferred tax

Deferred tax assets and liabilities are recognized in respect of temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes.

Deferred tax is measured at the tax rates that are expected to be applied to the temporary differences when they reverse, based on the laws that have been enacted or substantively enacted by the reporting date.

The measurement of deferred tax assets and liabilities reflects the tax consequences that would follow the manner in which the Bank expects, at the end of the reporting period, to recover or settle the carrying amount of its assets and liabilities.

Deferred tax assets are recognized only to the extent that it is probable that future taxable profits will be available until l January 2023 against which the temporary differences, unused tax losses and credits can be utilized. Deferred tax assets are reduced to the extent that taxable profit will be available against when the deductible temporary differences can be utilized.

Due to the nature of the new taxation described above, the financial institutions registered in Georgia will not have any differences between tax bases of assets and their carrying amounts from 1 January 2023 and hence, no deferred income tax assets and liabilities will arise, there on.

(e) Financial assets and financial liabilities

i. Recognition and initial measurement

The Bank initially recognises loans to customers and deposits on the date on which they are originated. All other financial instruments (including regular-way purchases and sales of financial assets) are recognised on the trade date, which is the date when the Bank becomes party of contractual provisions of the instrument.

A financial asset or financial liability is measured initially at fair value plus, for an item not at FVTPL, transaction costs that are directly attributable to the acquisition or issue. The fair value of financial instrument at initial recognition is generally its transaction price.

ii. Classification

Financial asset

On initial recognition, a financial asset is classified as measured at: amortised cost, FVOCI or FVTPL.

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

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

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

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

When a debt financial asset measured at FVOCI is derecognised, the cumulative gain or loss previously recognised in other comprehensive income is reclassified from equity to profit or loss.

All other financial assets are classified as measured at FVTPL.

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

Business model assessment

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

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

The Bank's retail and corporate banking business comprises loans to customers that are held for collecting contractual cash flows. In the retail business the loans comprise overdrafts, unsecured and secured lending. Sales of loans from these portfolios are very rare.

Certain debt securities are held by the Bank in a separate portfolio for long term yield. These securities may be sold, but such sales are not expected to be more than infrequent. The Bank considers that these securities are held within a business model whose objective is to hold assets to collect the contractual cash flows.

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

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

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

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

- contingent events that would change the amount and timing of cash flows;
- leverage features;
- prepayment and extension terms;

- terms that limit the Bank's claim to cash flows from specified assets (e.g. non-recourse asset arrangements); and
- features that modify consideration of the time value of money – e.g. periodical reset of interest rates.

Non-recourse loans

In some cases loans made by the Bank that are secured by collateral of the borrower limit the Bank's claim to cash flows of the underlying collateral (non-recourse loans). The Bank applies judgment in assessing whether the non-recourse loans meet SPPI criterion. The Bank typically considers the following information when making the judgement:

- whether the contractual arrangement specifically defines the amounts and dates of cash payments of the loan;
- the fair value of collateral relative to the amount of the secured financial asset;
- the ability and willingness of the borrower to make contractual payments, notwithstanding the decline in the value of collateral;
- the extent to which the collateral represents all or substantial portion of borrower's assets; and
- whether the Bank will benefit from any upside from the underlying asset.

Reclassification

Financial assets are not reclassified subsequent to their initial recognition, except in the period after the Bank changes its business model for managing financial assets.

Financial liabilities

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

iii. Derecognition

Financial assets

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

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

If the Bank enters into transactions whereby it transfers assets recognised on its statement of financial position, but retains all or substantially all of the risks and rewards of transferred assets or a portion of them, in such cases, the transferred assets are not derecognised. Examples of such transactions are security lending and sale-and-repurchase transactions.

Financial liabilities

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

iv. Modification of financial assets and financial liabilities

Financial assets

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

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

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

The Bank concludes that the modification is substantial as a result of the following qualitative factors:

- change the currency of the financial asset.

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

If the modification of a financial asset measured at amortised cost or FVOCI does not result in derecognition of the financial asset, then the Bank first recalculates the gross carrying amount of the financial asset using the original effective interest rate of the asset and recognises the resulting adjustment as a modification gain or loss in profit or loss. Any costs or fees incurred and fees received as part of the modification adjust the gross carrying amount of the modified financial asset and are amortised over the remaining term of the modified financial asset.

If such modification is carried out because of financial difficulties of the borrower (see Note 3(e)(vii)), then the gain or loss is presented together with impairment losses. In other cases, it is presented as interest income calculated using the effective interest method (see Note 3(b)).

Financial liabilities

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

The Bank concludes that the modification is substantial as a result of the following qualitative factors:

- change the currency of the financial liability;
- change in collateral or other credit enhancement.

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

If the modification of a financial liability is not accounted for as derecognition, then the amortised cost of the liability is recalculated by discounting the modified cash flows at the original effective interest rate and the resulting gain or loss is recognised in profit or loss. For floating-rate financial liabilities, the original effective interest rate used to calculate the modification gain or loss is adjusted to reflect current market terms at the time of the modification. Any costs and fees incurred are recognised as an adjustment to the carrying amount of the liability and amortised over the remaining term of the modified financial liability by re-computing the effective interest rate on the instrument.

v. Offsetting

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

Income and expenses are presented on a net basis only when permitted under IFRS standards, or for gains and losses from a group of similar transactions.

vi. Fair value measurement

‘

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

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

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

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

The Bank recognises transfers between levels of the fair value hierarchy as of the end of the reporting period during which the change has occurred.

vii. Impairment

See also Note 4.

The Bank recognises loss allowances for expected credit losses (ECL) on the following financial instruments that are not measured at FVTPL:

- financial assets that are debt instruments;
- loan commitments and financial guarantee contracts issued.

The Bank measures loss allowances at an amount equal to lifetime ECL, except for the following, for which they are measured as 12-month ECL:

- debt investment securities assets are determined to have low credit risk at the reporting date; and
- other financial instruments on which credit risk has not increased significantly since their initial recognition (see Note 4).

The Bank considers a debt investment security to have low credit risk when its credit risk rating is equivalent to the globally understood definition of 'investment grade'. The Bank does not apply the low credit risk exemption to any other financial instruments.

12-month ECL are the portion of ECL that result from default events on a financial instrument that are possible within the 12 months after the reporting date. Financial instruments for which a 12-month ECL is recognised are referred to as 'Stage 1' financial instruments. Financial instruments allocated to Stage 1 have not undergone a significant increase in credit risk since initial recognition and are not credit-impaired.

Lifetime ECLs are the ECLs that result from all possible default events over the expected life of the financial instrument or the maximum contractual period of exposure. Financial instruments for which a lifetime ECL is recognised but are not credit-impaired are referred to as 'Stage 2' financial instruments. Financial instruments allocated in Stage 2 are those that have experienced a significant increase in credit risk since initial recognition but are not credit-impaired.

Financial instruments for which lifetime ECL are recognised and that are credit-impaired are referred to as "Stage 3 financial instruments".

Measurement of ECL

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

- *financial assets that are not credit-impaired at the reporting date:* as the present value of all cash shortfalls (i.e. the difference between the cash flows due to the entity in accordance with the contract and the cash flows that the Bank expects to receive);
- *financial assets that are credit-impaired at the reporting date:* as the difference between the gross carrying amount and the present value of estimated future cash flows; and
- *undrawn loan commitments:* as the present value of the difference between the contractual cash flows that are due to the Bank if the commitment is drawn down and the cash flows that the Bank expects to receive;
- *financial guarantee contracts:* the expected payments to reimburse the holder less any amounts that the Bank expects to recover.

When discounting future cash flows, the following discount rates are used:

- *financial assets other than purchased or originated credit-impaired financial assets (POCI):* the original effective rate or an approximation thereof; and
- *undrawn loan commitments:* the effective interest rate or an approximation thereof, that will be applied to the financial asset resulting from the loan commitment.
- *financial guarantee contracts issued:* the rate that reflects the current market assessment of the time value of money and the risks that are specific to the cash flows.

Restructured financial assets

If the terms of a financial asset are renegotiated or modified or an existing financial asset is replaced with a new one due to financial difficulties of the borrower, then an assessment is made of whether the financial asset should be derecognised (see Note 3(e)(iii)) and ECL are measured as follows.

- If the expected restructuring will not result in derecognition of the existing asset, then the expected cash flows arising from the modified financial asset are included in calculating the cash shortfalls from the existing asset (see Note 4).
- If the expected restructuring will result in derecognition of the existing asset, then the expected fair value of the new asset is treated as the final cash flow from the existing financial asset at the time of its derecognition. This amount is included in calculating the cash shortfalls from the existing financial asset that are discounted from the expected date of derecognition to the reporting date using the original effective interest rate of the existing financial asset.

Credit-impaired financial assets

At each reporting date, the Bank assesses whether financial assets carried at amortised cost are credit-impaired (referred to as ‘Stage 3 financial assets’). A financial asset is ‘credit-impaired’ when one or more events that have a detrimental impact on the estimated future cash flows of the financial asset have occurred.

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

For retail loans:

- Death of borrower;
- Loans past due more than 90 days (more than 60 days for Silkloans);
- Restructuring of the loan, linked with the economic loss;
- Court’s decision, which causes the borrower’s inability to service its debt obligations.

For business loans:

- Bankruptcy proceedings of the borrower;
- Loans past due more than 90 days;
- Restructuring of the loan, linked with the economic loss;
- Fraud event or misleading information from the borrowers side, that may affect the company’s solvency;
- Transferring any of the borrower’s loan to Stage 3.

For investment securities:

- The market’s assessment of creditworthiness as reflected in bond yields;
- The rating agencies assessment of creditworthiness;
- The counterparty’s ability to access the capital markets for new debt issuance;
- The probability of debt being restructured, resulting in holder’s suffering losses through voluntary or mandatory debt forgiveness.

Presentation of allowance for ECL in the statement of financial position

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

- *financial assets measured at amortised cost:* as a deduction from the gross carrying amount of the assets.
- *loan commitments and financial guarantee contracts:* generally, as a provision;
- *where a financial instrument includes both a drawn and an undrawn component, and the Bank cannot identify the ECL on the loan commitment component separately from those on the drawn component:* the Bank presents a combined loss allowance for both components. The combined amount is presented as a deduction from the gross carrying amount of the drawn component. Any excess of the loss allowance over the gross amount of the drawn component is presented as a provision; and

Write-offs

Loans and debt securities are written off (either partially or in full) when there is no reasonable expectation of recovering a financial asset in its entirety or a portion thereof. This is generally the case when the Bank determines that the borrower does not have assets or sources of income that could generate sufficient cash flows to repay the amounts subject to the write-off. This assessment is carried out at the individual asset level.

Recoveries of amounts previously written off are included in 'impairment loss on debt financial assets and loan commitments, net" in the statement of profit or loss and other comprehensive income.

Financial assets that are written off could still be subject to enforcement activities in order to comply with the Bank's procedures for recovery of amounts due.

(f) Cash and cash equivalents

Cash and cash equivalents consist of cash on hand, amounts due from the National Bank of Georgia, excluding obligatory reserves, and amounts due from financial institutions that mature within ninety days or less of the date of acquisition that are subject to an insignificant risk of changes in their fair value, and are used by the Bank in the management of its short-term commitments.

Cash and cash equivalents are carried at amortised cost in the statement of financial position.

(g) Derivatives held for risk management purposes

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

(h) Loans to customers

'Loans to customers' caption in the statement of financial position include loans to customers measured at amortized cost (see Note 3(e)(i)); they are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortized cost using the effective interest method.

(i) Investment securities

The 'investment securities' caption in the statement of financial position includes debt investment securities measured at amortised cost (see Note 3(e)(i)); these are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortised cost using the effective interest method.

(j) Property and equipment

(i) Recognition and measurement

Items of property and equipment, except for land and buildings, are measured at cost less accumulated depreciation and any accumulated impairment losses.

Cost includes expenditure that is directly attributable to the acquisition of the asset and bringing the asset to a working condition for their intended use. Purchased software that is integral to the functionality of the related equipment is capitalised as part of equipment.

The carrying values of equipment are reviewed for impairment when events or changes in circumstances indicate that the carrying value may not be recoverable.

Following initial recognition at cost, land and buildings are carried at a revalued amount, which is the fair value at the date of the revaluation less any subsequent accumulated depreciation and subsequent accumulated impairment losses. Valuations are performed frequently enough to ensure that the fair value of a revalued asset does not differ materially from its carrying amount.

Accumulated depreciation as at the revaluation date is eliminated against the gross carrying amount of the asset and the net amount is restated to the revalued amount of the asset. Any revaluation surplus is credited to the revaluation reserve for property and equipment included in other comprehensive income, except to the extent that it reverses a revaluation decrease of the same asset previously recognised in the statement of profit or loss, in which case the increase is recognised in the statement of profit or loss. A revaluation deficit is recognised in the statement of profit or loss, except that a deficit directly offsetting a previous surplus on the same asset is directly offset against the surplus in the revaluation reserve for property and equipment.

An annual transfer from the revaluation reserve for property and equipment to retained earnings is made for the difference between depreciation based on the revalued carrying amount of the assets and depreciation based on the assets original cost. Upon disposal, any revaluation reserve relating to the particular asset being sold is transferred to retained earnings.

Purchased software that is integral to the functionality of the related equipment is capitalised as part of that equipment.

(ii) Subsequent costs

Subsequent expenditure is capitalised only if it is probable that future economic benefits associated with the expenditure will flow to the Bank. Ongoing repairs and maintenance are expensed as incurred.

(iii) Depreciation

Depreciation of an asset begins when it is available for use. Land is not depreciated. Depreciation is calculated on a straight-line basis over the following estimated useful lives:

	Years
Buildings	50
Furniture and fixtures	4-10
Computers and office equipment	4-10
Motor vehicles	5
Other	4-10

The asset’s residual values, useful lives and methods are reviewed, and adjusted as appropriate, at each financial year-end.

(k) Impairment of non-financial assets

At each reporting date, the Bank reviews the carrying amount of its non-financial assets (other than deferred tax assets) to determine whether there is any indication of impairment. If any such indication exists, than the asset’s recoverable amount is estimated.

For the purpose of impairment testing, assets are grouped together into the smallest group of assets that generates cash inflows from continuing use that are largely independent of the cash inflows of other assets or CGU.

The recoverable amount of an asset or CGU is the greater of its value in use and its fair value less costs to sell. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset or CGU.

An impairment loss is recognized if the carrying amount of an asset and its related cash-generating unit (CGU) exceeds its estimated recoverable amount.

The Bank's assets do not generate separate cash inflows and are used as one CGU.

Impairment losses are recognised in profit or loss. Impairment losses recognised in respect of CGUs (if any) are allocated first to reduce the carrying amount of any goodwill allocated to the CGU and then to reduce the carrying amounts of the other assets in the CGU on a pro rata basis.

An impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortization, if no impairment loss had been recognized.

(l) Current accounts and deposits from customers

Current accounts and deposits from customers are initially measured at fair value minus incremental direct transaction costs. Subsequently, they are measured at their amortised costs using effective interest method (see Note 3(e)(ii)).

(m) Assets held for sale

The Bank classifies a non-current asset of repossessed property as "assets held for sale" whose carrying amount will be recovered principally through a sale transaction rather than through continuing use. Fixed assets held for sale are measured at lower of its carrying amount and fair value less cost to sell. Subsequent write downs (which does not include gain or loss from disposals) of carrying amount of fixed assets held for sale are recognized as an impairment loss. Gain on the subsequent increase in fair value less cost to sell of assets held for sale is recognized not in excess of previously recognized impairment loss.

(n) Share capital

i. Ordinary shares

Ordinary shares are classified as equity. Incremental costs directly attributable to the issue of ordinary shares are recognized as a deduction from equity, net of any tax effects.

ii. Dividends

The ability of the Bank to declare and pay dividends is subject to the rules and regulations of Georgia. Dividends in relation to ordinary shares are reflected as an appropriation of retained earnings in the period when they are declared.

(o) Standards issued but not yet effective

A number of new standards and amendments to standards are effective for annual periods beginning after 1 January 2020 with earlier application permitted; however, the Bank has not early adopted them in preparing these financial statements. The following new and amended standards are not expected to have a significant effect on the Bank's financial statements:

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

- *Onerous Contracts – Cost of Fulfilling a Contract (Amendments to IAS 37);*
- *COVID-19-Related Rent Concessions (Amendment to IFRS 16);*
- *Property, Plant and Equipment: Proceeds before Intended Use (Amendments to IAS 16);*
- *Reference to Conceptual Framework (Amendments to IFRS 3);*
- *Classification of Liabilities as Current or Non-current (Amendments to IAS 1);*
- *IFRS 17 Insurance Contracts and amendments to IFRS 17 Insurance Contracts.*

4. Financial risk review

This note presents information about the Bank's exposure to financial risks. For information on the Bank's financial risk management framework, see Note 20.

Credit quality analysis

The following table sets out information about the credit quality of financial assets measured at amortised cost without taking into account collateral or other credit enhancement. Unless specially indicated, for financial assets, the amounts in the table represent gross carrying amounts. Explanation of the terms: Stage 1, Stage 2, Stage 3, are included in Note 3(e)(vii).

	31 December 2020			
GEL'000	**Stage 1**	**Stage 2**	**Stage 3**	**Total**
Loans to customers at amortised cost – corporate customers				
Rated Caa2	-	2,346	-	2,346
Rated Ca-C	196	3,108	1,054	4,358
Total	**196**	**5,454**	**1,054**	**6,704**
Loss allowance	**-**	**(367)**	**(250)**	**(617)**
Carrying amount	**196**	**5,087**	**804**	**6,087**
Loans to customers at amortised cost – retail customers				
Online Loans				
Not overdue	200	56	-	256
Online loans - Overdue less than 30 days	13	5	-	18
Online loans - Overdue 30-60 days	-	3	-	3
Online loans - Overdue more than 60-90 days	-	-	-	-
Overdue more than 90 days	-	-	5	5
Overdue less than 90 (with restructure status)	-	76	207	283
Overdue more than 90 (with restructure status)	-	-	17	17
Other retail loans*				
Not overdue	3,838	403	-	4,241
Overdue less than 30 days	16	-	-	16
Overdue 30-60 days	-	-	-	-
Overdue 60-90 days	-	-	-	-
Overdue more than 90 days	-	-	247	247
Overdue less than 90 (with restructure status)	-	21	218	239
Overdue more than 90 (with restructure status)	-	-	315	315
Total retail	**4,067**	**564**	**1,009**	**5,640**
Loss allowance	**(142)**	**(137)**	**(505)**	**(784)**
Carrying amount	**3,925**	**427**	**504**	**4,856**
Grand total of carrying amount of loans to customers	**4,121**	**5,514**	**1,308**	**10,943**

The probability of default for the business loan is evaluated by an individual approach by an expert on a rating system based on a scoring questionnaire and represents the country's rating (based on Moody's rating agency) adjusted by the individual risk characteristics of each individual borrower and level of their access to the government support.

As at 31 December 2020, the probability of default of Stage 2 business loans ranged from 50% to 75%, 100% PD was applied to Stage 3 business loans and PDs for not overdue retail customers varied from 4% to 12% (31 December 2019: from 8% to 14%).

	31 December 2019			
GEL'000	**Stage 1**	**Stage 2**	**Stage 3**	**Total**
Loans to customers at amortised cost – corporate customers				
Rated B1	3,544	-	-	3,544
Rated B2	1,856	-	-	1,856
Rated B3	980	-	-	980
Rated Caa1	182	-	-	182
Rated Ca-C	-	-	1,048	1,048
Total	**6,562**	**-**	**1,048**	**7,610**
Loss allowance	**(123)**	**-**	**(179)**	**(302)**
Carrying amount	**6,439**	**-**	**869**	**7,308**
Loans to customers at amortised cost – retail customers				
Online Loans				
Not overdue	738	-	-	738
Online loans - Overdue less than 30 days	86	-	-	86
Online loans - Overdue 30-60 days	-	17	-	17
Online loans - Overdue more than 60-90 days	-	15	-	15
Overdue more than 90 days	-	-	1,347	1,347
Overdue less than 90 (with restructure status)	-	432	-	432
Other retail loans*				
Not overdue	4,218	-	-	4,218
Overdue less than 30 days	16	-	-	16
Overdue 30-60 days	-	5	-	5
Overdue 60-90 days	-	140	-	140
Overdue more than 90 days	-	-	462	462
Overdue less than 90 (with restructure status)	-	-	241	241
Overdue more than 90 (with restructure status)	-	-	-	-
Total retail	**5,058**	**609**	**2,050**	**7,717**
Loss allowance	**(288)**	**(247)**	**(1,343)**	**(1,878)**
Carrying amount	**4,770**	**362**	**707**	**5,839**
Grand total of carrying amount of loans to customers	**11,209**	**362**	**1,576**	**13,147**

* Expected credit losses under IFRS 9 for loans to retail customers include ECL for undrawn loan commitments on credit cards.

At 31 December 2020, Bank holds two corporate loans to customers with amount of GEL 2,189 thousand for which no loss allowance is recognised because of collateral (31 December 2019: no financial instruments for which no loss allowance is recognised because of collateral). As at 31 December 2020, loss given default for the rest of the Stage 1 and Stage 2 business loans varied from 12% to 21%. As at 31 December 2020, loss given default for not overdue retail loans varied from 29% to 45% (31 December 2019: from 21% to 54%).

During the period, there was no change in the Bank's collateral policies.

Credit risk - Amounts arising from ECL

Inputs, assumptions and techniques used for estimating impairment

IFRS 9 requires management to make a number of judgements, assumptions and estimates that affect the allowance for ECL. Estimates and judgements are based on management's knowledge and historical experience. See also accounting policy in Note 3(e)(vii).

The impact of COVID-19 resulted in the application of further judgement within those areas due to the limited recent experience of the economic and financial impacts of such an event. As a result, the Bank has made a number of changes in the significant judgements that were applied as at the end of the previous reporting date. A summary of the key judgements made by management is set out below.

Significant increase in credit risk

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

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

- the remaining lifetime probability of default (PD) as at reporting date; with
- the remaining lifetime PD for this point in time that was estimated at the time of initial recognition of the exposure (adjusted where appropriate for changes in prepayment expectations).

The Bank uses three criteria for determining whether there has been a significant increase in credit risk:

- a quantitative test based on movement in PD;
- qualitative indicators; and
- backstop indicator of more than 30 days past due.

Generating the term structure of PD

Consumer loans

Modelling of probability of default of consumer loans is based on the collective analysis method for each segment of loans separately. According to the definition of default, probability of default is based on historic monthly migration analysis in accordance with defaults in segments for previous 4 years period. For the segments lacking historical data, the period differs depending on what period there are factual data.

For every segment, historical average monthly matrix was calculated and the probability of default for desired period was defined by extrapolation of the matrix (1 year and whole lifecycle).

Corporate loans

The probability of default for the business loan is evaluated by an individual approach by an expert on a rating system based on a scoring questionnaire and represents the country's rating adjusted by the individual risk characteristics of each individual borrower and level of their access to the government support.

Determining whether credit risk has increased significantly

The Bank assesses whether credit risk has increased significantly since initial recognition at each reporting period. What is considered significant will differ for different types of lending, in particular between financial assets assessed individually and collectively. Bank uses overdue status of the financial assets as a backstop indicator and other qualitative indicators to assess whether significant increase in credit risk has occurred. Below are the description of qualitative indicators of significant increase in credit risk.

Corporate customers

- Violation of financial or non-financial covenants;
- Legal action to borrower, which may cause significant cash outflow;
- Restructuring of the loan, which is not linked with the economic loss;
- Placing lien or restriction on the bank account of the borrower;
- Delay in providing financial information for 1 year;
- EBITDA < 0 or EBITDA/Debt Payment < 1, compared to previous period;
- Significant deterioration of borrower's financial position, including: loss of contract with main supplier; loss of main customer; forecast of negative cash flow; significant deterioration of profitability**.**

Retail customer

- Restructuring of the loan, which is not linked with the economic loss;
- Increase of Loan-to-Value ratio up to 100%;
- If borrower falls in the debtor registry list;
- Placing lien or restriction on the bank account of the borrower;
- If borrower losses a job;
- If borrower requests temporary payment relief due to economic loss.

As a backstop, the Bank considers that a significant increase in credit risk occurs no later than when an asset is more than 30 days past due. Days past due are determined by counting the number of days since the earliest missed due date in respect of which full payment has not been received. Due dates are determined without considering any grace period that might be available to the borrower.

If there is evidence that there is no longer a significant increase in credit risk relative to initial recognition, then the loss allowance on an instrument returns from lifetime ECL to being measured as 12-month ECL.

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

- the criteria are capable of identifying significant increases in credit risk before an exposure is in default;
- the criteria do not align with the point in time when an asset becomes more than 30 days past due;
- the average time between the identification of a significant increase in credit risk and default appears reasonable;
- exposures are not generally transferred directly from 12-month ECL measurement to credit-impaired; and
- there is no unwarranted volatility in loss allowance from transfers between 12-month PD (stage 1) and lifetime PD measurements (stage 2).

Definition of default

The Bank considers a financial asset to be in default when:

- the borrower is unlikely to pay its credit obligations to the Bank in full, without recourse by the Bank to actions such as realising security (if any is held);
- the borrower is either more than 90 days past due (more than 60 days for silkloans) or has restructured loan more than once due on any material obligations to the Bank. Overdrafts are considered as being past due once the customer has breached an advised limit or been advised of a limit smaller than the current amount outstanding;

- it is becoming probable that the borrower will restructure the asset as a result of bankruptcy due to the borrower's inability to pay its credit obligations.

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

- qualitative: e.g. breaches of covenants;
- quantitative: e.g. overdue status and non-payment on another obligation of the same borrower to the Bank; and
- based on data developed internally or obtained from external sources.

COVID-19

In response to COVID-19 outbreak the Bank came out with an initiative to grant three-month payment holidays to its borrowers during March-May 2020 in order to significantly reduce the requirement for customers to physically visit Bank branches. Such event was not automatically considered as SICR event (i.e. trigger to transfer the exposure from Stage 1 to Stage 2) and the exposure was only transferred to Stage 2 where there was an observable evidence of financial difficulties of the borrower indicating that the level of risk has increased significantly since the loan origination.

Retail customers

Subsequent to May 2020, the Bank continued to offer full or partial payment holiday options to the retail segment borrowers on a mass scale basis. Borrowers who accepted payment holidays subsequent of May 2020, were assumed that the credit risk has significantly increased and were transferred to either Stage 2 or Stage 3 depending on relevant parameters.

Corporate customers

The Bank applied individual approach to identify if SICR occurred since loan origination. The loan was transferred to Stage 2 if the borrower accepted payment holidays subsequent of May 2020, or when other observable evidence of financial difficulties of the borrower indicated that the level of risk has increased significantly since loan origination.

Incorporation of forward-looking information

The Bank incorporates forward-looking information into both the assessment of whether the credit risk of an instrument has increased significantly since its initial recognition and the measurement of ECL.

The Bank has identified and documented key drivers of credit risk and credit losses for each portfolio of financial instruments and, using an analysis of historical data, has estimated relationships between macro-economic variables and credit risk and credit losses.

Among the tested macroeconomic parameters such as GDP, inflation, Nominal Effective Exchange Rate, inflation (12 months average to prior year 12 months average) was proved to have statistically significant influence on portfolio probabilities of default. Historical correlations over the past 4 years showed the high relationship between inflation and PD. PD-s for every segment were adjusted by inflation forecasts considering the different weights of possible scenarios (optimistic scenario - 25%, base scenario - 50%, pessimistic scenario – 25%) and results were incorporated in the calculation of annual PD by Vasicek's formula.

Vasicek model uses the correlation between macro parameter and PD estimated through least square regression and adjusts PD based on historical dependency according to the forecasted inflation.

Inflation forecasts according to the National Bank of Georgia are as follows:

	2021		
	Optimistic scenario	**Base scenario**	**Pessimistic scenario**
Inflation growth %	4.0	3.0	6.0

Modified financial assets

The contractual terms of a loan may be modified for a number of reasons, including changing market conditions, customer retention and other factors not related to a current or potential credit deterioration of the customer. An existing loan whose terms have been modified may be derecognised and the renegotiated loan recognised as a new loan at fair value in accordance with the accounting policy set out in Note 3(e)(iv).

The revised terms usually include extending the maturity, changing the timing of interest payments and amending the terms of loan covenants. Restructuring is a qualitative indicator of significant increase in credit risk, as well as default and credit impairment.

When the terms of a financial asset are modified and the modification does not result in derecognition, the determination of whether the asset's credit risk has increased significantly reflects comparison of:

- its remaining lifetime PD at the reporting date based on the modified terms; with
- the remaining lifetime PD estimated based on data at initial recognition and the original contractual terms.

When modification results in derecognition, a new loan is recognised and allocated to Stage 1 (assuming it is not credit-impaired at that time).

In response to COVID-19, when the Bank provides payment holidays and the net economic value of the loan is not significantly affected, the modification would be unlikely to be considered as substantial. Payment holidays together with reasonable and supportable information, both quantitative and qualitative (for example, because of longer-term liquidity or solvency problems of the borrower) is considered to be triggering a SICR.

The Bank granted payment holidays on a loan portfolio with the gross carrying amount of GEL 9,560 thousand, out of the above amount as at 31 December 2020 the remaining balance of gross carrying amount is GEL 8,926 thousand, including GEL 106 thousand modification effect. Total amount of expected credit loss balance on a modified portfolio as at 31 December 2020 is GEL 931 thousand.

Measurement of ECL

The key inputs into the measurement of ECL are the term structure of the following variables:

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

ECL for exposures in Stage 1 is calculated by multiplying the 12-month PD by LGD and EAD. Lifetime ECL is calculated by multiplying the lifetime PD by LGD and EAD.

The methodology of estimating PDs is discussed above under the heading "Generating the term structure of PD".

For the credit loss calculating purposes, the loss of the financial asset defaults is measured. The loss on consumer loans is assessed collectively according to segments and business loans according to individual scenarios.

LGD is the magnitude of the likely loss if there is a default. The Bank estimates LGD parameters based on the history of recovery rates of claims against defaulted counterparties. Loans are grouped by the default years and repaid exposure is linked to each group. LGD is calculated on a discounted cash flow basis using an effective interest rate as the discounting factor.

Exposure at Default (EAD) represents the expected exposure in the event of default. The EAD for financial assets is its gross carrying amount at the time of default. The Bank differentiates EAD on a product basis. For Collateralized and Uncollateralized loans EAD is calculated based on average remaining maturity of these products, for every year separately. Bank assumes, that mid-year is the point of default (month 6), meaning that payments were made during first three months (month 3) and exposure becomes overdue starting from the fourth month. EAD for Credit cards is stated to be 100% of the disbursed amounts. EAD for Silkloans and Silkloan plus – is 100% of the whole portfolio for the reporting date as these products are short-term by its nature.

Loss allowance

The following tables show reconciliations from the opening to the closing balances of the loss allowance by class of financial instruments. The basis for determining transfers due to changes in credit risk is set out in the accounting policy; see Note 3 (e).

	2020				**2019**			
GEL'000	**Stage 1**	**Stage 2**	**Stage 3**	**Total**	**Stage 1**	**Stage 2**	**Stage 3**	**Total**
Loans to customers at amortised cost								
Balance at 1 January	411	247	1,522	2,180	1,042	424	2,153	3,619
Transfer to Stage 2	(120)	122	(2)	-	(10)	10	-	-
Transfer to Stage 3	(4)	(39)	43	-	(183)	(84)	267	-
Net remeasurement of loss allowance	(166)	115	719	668	(581)	(310)	1,394	503
New financial assets originated or purchased	270	-	-	270	762	-	-	762
Transfer to Stage 2	(59)	59	-	-	(207)	207	-	-
Transfer to Stage 3	(190)	-	190	-	(412)	-	412	-
Write-offs	-	-	(1,717)	(1,717)	-	-	(2,704)	(2,704)
Balance at 31 December	**142**	**504**	**755**	**1,401**	**411**	**247**	**1,522**	**2,180**
Loans to customers at amortised cost – corporate customers								
Balance at 1 January	123	-	179	302	81	-	114	195
Transfer to Stage 2	(106)	106	-	-	-	-	-	-
Transfer to Stage 3	-	-	-	-	-	-	-	-
Net remeasurement of loss allowance	(17)	261	71	315	42		(114)	(72)
New financial assets originated or purchased	-	-	-	-	179	-	-	179
Transfer to Stage 3	-	-	-	-	(179)	-	179	-
Write-offs	-	-	-	-	-	-	-	-
Balance at 31 December	**-**	**367**	**250**	**617**	**123**	**-**	**179**	**302**

	2020				2019			
GEL'000	**Stage 1**	**Stage 2**	**Stage 3**	**Total**	**Stage 1**	**Stage 2**	**Stage 3**	**Total**
Loans to customers at amortised cost – retail customers								
Balance at 1 January	288	247	1,343	1,878	961	424	2,039	3,424
Transfer to Stage 2	(14)	16	(2)	-	(10)	10	-	-
Transfer to Stage 3	(4)	(39)	43	-	(183)	(84)	267	-
Net remeasurement of loss allowance	(149)	(146)	648	353	(623)	(310)	1,508	575
New financial assets originated or purchased	270	-	-	270	583	-	-	583
Transfer to Stage 2	(59)	59	-	-	(207)	207	-	-
Transfer to Stage 3	(190)	-	190	-	(233)	-	233	-
Write-offs	-	-	(1,717)	(1,717)	-	-	(2,704)	(2,704)
Balance at 31 December	**142**	**137**	**505**	**784**	**288**	**247**	**1,343**	**1,878**

GEL'000	**2020**	**2019**
Investment securities at amortised cost		
Balance at 1 January	86	-
Net remeasurement of loss allowance	(11)	36
New financial assets originated or purchased	87	50
Balance at 31 December	**162**	**86**

The following table provides a reconciliation between amounts shown in the above tables reconciling opening and closing balances of loss allowance per class of financial instrument.

	2020			
GEL'000	**Loans to customers at amortised cost - retail customers**	**Loans to customers at amortised cost - corporate customers**	**Investment securities at amortised cost**	**Total**
Net remeasurement of loss allowance	353	315	(11)	657
New financial assets originated or purchased	270	-	87	357
Total	**623**	**315**	**76**	**1,014**
Recoveries of amounts previously written off	(270)	-	-	(270)
Total	**353**	**315**	**76**	**744**

	2019			
GEL'000	**Loans to customers at amortised cost - retail customers**	**Loans to customers at amortised cost - corporate customers**	**Investment securities at amortised cost**	**Total**
Net remeasurement of loss allowance	575	(72)	36	539
New financial assets originated or purchased	583	179	50	812
Total	**1,158**	**107**	**86**	**1,351**
Recoveries of amounts previously written off	(143)	-	-	(143)
Total	**1,015**	**107**	**86**	**1,208**

The significant changes in the gross carrying amount of loans measured at amortized cost disbursed to corporate and retail customers are further explained below.

	2020				2019			
GEL'000	**Stage 1**	**Stage 2**	**Stage 3**	**Total**	**Stage 1**	**Stage 2**	**Stage 3**	**Total**
Loans to customers at amortised cost								
Balance at 1 January	11,620	609	3,103	15,332	14,370	1,117	4,119	19,606
Transfer to Stage 2	(5,093)	5,115	(22)	-	(121)	121	-	-
Transfer to Stage 3	(33)	(134)	167	-	(987)	(381)	1,368	-
New financial assets originated or purchased	1,982	-	-	1,982	5,640	-	-	5,640
Transfer to Stage 2	(223)	223	-	-	(430)	430	-	-
Transfer to Stage 3	(360)	-	360	-	(1,334)	-	1,334	-
Repayments and other movements (including foreign currency revaluations)	(3,580)	236	197	(3,147)	(5,518)	(678)	(1,014)	(7,210)
Changes due to modifications that did not result in derecognition	(50)	(31)	(25)	(106)	-	-	-	-
Write-offs	-	-	(1,717)	(1,717)	-	-	(2,704)	(2,704)
Balance at 31 December	**4,263**	**6,018**	**2,063**	**12,344**	**11,620**	**609**	**3,103**	**15,332**

	2020				2019			
GEL'000	**Stage 1**	**Stage 2**	**Stage 3**	**Total**	**Stage 1**	**Stage 2**	**Stage 3**	**Total**
Loans to customers at amortised cost – corporate customers								
Balance at 1 January	6,562	-	1,048	7,610	7,554	-	956	8,510
Transfer to Stage 2	(4,837)	4,837	-	-	-	-	-	-
Transfer to Stage 3	-	-	-	-	-	-	-	-
New financial assets originated or purchased	-	-	-	-	1,048	-	-	1,048
Transfer to Stage 2	-	-	-	-	-	-	-	-
Transfer to Stage 3	-	-	-	-	(1,048)	-	1,048	-
Repayments and other movements (including foreign currency revaluations)	(1,529)	638	6	(885)	(992)	-	(956)	(1,948)
Changes due to modifications that did not result in derecognition	-	(21)	-	(21)	-	-	-	-
Write-offs	-	-	-	-	-	-	-	-
Balance at 31 December	**196**	**5,454**	**1,054**	**6,704**	**6,562**	**-**	**1,048**	**7,610**

	2020				2019			
GEL'000	**Stage 1**	**Stage 2**	**Stage 3**	**Total**	**Stage 1**	**Stage 2**	**Stage 3**	**Total**
Loans to customers at amortised cost – retail customers								
Balance at 1 January	5,058	609	2,055	7,722	6,816	1,117	3,163	11,096
Transfer to Stage 2	(256)	278	(22)	-	(121)	121	-	-
Transfer to Stage 3	(33)	(134)	167	-	(987)	(381)	1,368	-
New financial assets originated or purchased	1,982	-	-	1,982	4,592	-	-	4,592
Transfer to Stage 2	(223)	223	-	-	(430)	430	-	-
Transfer to Stage 3	(360)	-	360	-	(286)	-	286	-
Repayments and other movements (including foreign currency) revaluations	(2,051)	(402)	191	(2,262)	(4,526)	(678)	(58)	(5,262)
Changes due to modifications that did not result in derecognition	(50)	(10)	(25)	(85)				
Write-offs	-	-	(1,717)	(1,717)	-	-	(2,704)	(2,704)
Balance at 31 December	**4,067**	**564**	**1,009**	**5,640**	**5,058**	**609**	**2,055**	**7,722**

5. Net interest income

	2020 GEL'000	2019 GEL'000
Interest income calculated using the effective interest method		
Investment securities	3,400	1,555
Loans to customers	1,557	2,740
Other	695	711
	5,652	**5,006**
Interest expense		
Current accounts and deposits from customers	763	291
Loans from credit institutions	441	-
Certificate of deposits	98	-
Other	65	-
	1,367	**291**

6. General administrative expenses

	2020 GEL'000	2019 GEL'000
Communications and information services	802	761
Legal and consultancy*	693	700
Depreciation and amortization expense	448	553
Taxes other than on income	232	316
Utilities and office supplies	176	212
Security	89	84
Advertising and marketing expenses	8	45
Other	204	478
	2,652	**3,149**

* Legal and consultancy expenses include audit fees of GEL 147 thousand (2019: GEL 68 thousand).

7. Salaries and employment benefit expenses

	2020 GEL'000	2019 GEL'000
Wages and salaries	2,877	2,320
Other benefits	36	48
	2,913	**2,368**

The average number of Bank employees (excluding supervisory board members) for the year ended 31 December 2020 amounted 84 persons (2019: 82 persons), of which: top management - 7 employees (2019: 4 employees), mid-level managers – 14 employees (2019: 14 employees) and other staff - 63 employees (2019: 64 employees). All employees were full time employees.

8. Income tax benefit

	2020 GEL'000	2019 GEL'000
Movement in deferred tax assets and liabilities due to origination and reversal of temporary differences	11	184
Total income tax benefit	**11**	**184**

In 2020, the applicable tax rate for current and deferred tax is 15% (2019: 15%).

Reconciliation of effective tax rate for the year ended 31 December:

	2020 GEL'000	%	2019 GEL'000	%
Loss before income tax	(1,081)		(648)	
Income tax at the applicable tax rate	(162)	15	(97)	15
Change in unrecognised deferred tax assets	-	-	88	(14)
Non-deductible differences	151	(14)	(175)	27
	(11)	**1**	**(184)**	**28**

Deferred tax assets and liabilities

Temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes give rise to net deferred tax liability as at 31 December 2020 and 31 December 2019. Movements in temporary differences during the years ended 31 December 2020 and 2019 are presented as follows:

2020 GEL'000	**1 January 2020**	**Recognised in equity**	**Recognized in profit or loss**	**31 December 2020**
Property and equipment	(310)	-	194	(116)
Loans to customers	73	-	(81)	(8)
Assets held for sale	52	-	(110)	(58)
Other liability	25	-	8	33
	(160)	**-**	**11**	**(149)**

2019 GEL'000	**1 January 2019**	**Recognised in equity**	**Recognized in profit or loss**	**31 December 2019**
Property and equipment	(308)	(210)	208	(310)
Loans to customers	100	-	(27)	73
Assets held for sale	45	-	7	52
Other liability	29	-	(4)	25
	(134)	**(210)**	**184**	**(160)**

Unrecognised deferred tax assets

Deferred tax assets of GEL 1,021 thousand (2019: GEL 1,021 thousand) have not been recognised in respect of tax losses. According to the Estonian Tax Model (note 3 (d) (i)), utilization of tax losses will not be applicable starting from 2023. Deferred tax assets have not been recognised in respect of these items because it is not probable that future taxable profit will be available against which the Bank can utilise the benefits there from.

9. Cash and cash equivalents

	2020 GEL'000	2019 GEL'000
Cash on hand	**1,377**	**3,821**
Nostro accounts with the National Bank of Georgia excluding obligatory reserves	**112**	**223**
Nostro accounts with other banks		
Rated BB- to BB+	3,038	13,552
Rated B+ and below	104	468
Total nostro accounts with other banks	**3,142**	**14,020**
Cash equivalents		
Term deposit	1,000	3,000
Total cash and cash equivalents	**5,631**	**21,064**

No cash and cash equivalents are past due. As at 31 December 2020 the Bank allocates cash equivalents under Stage 1 for the purposes of identifying expected credit loss under IFRS 9 (31 December 2019: Stage 1). Management estimates that ECL is immaterial at reporting dates.

The term deposit is held with the National Bank of Georgia with short term issuer default rating of B (based on S&P's rating agency).

As at 31 December 2020 and 2019, the Bank did not have a counterparty with the balance exceeding 10% of the Bank's equity.

10. Amounts due from credit institution

	2020 GEL'000	2019 GEL'000
Obligatory reserve with the National Bank of Georgia (NBG)	1,171	2,991
Total amounts due from credit institution	**1,171**	**2,991**

In 2020 the credit institutions are required to maintain an interest earning cash deposit (obligatory reserve) with the NBG at 5% and at 25% of the average of funds attracted from customers and non-resident financial institutions by a credit institution for the appropriate two-week period in GEL and foreign currencies, respectively.

As at 31 December 2020 the Bank allocates amounts due from credit institutions under Stage 1 for the purposes of identifying expected credit loss under IFRS 9 (31 December 2019: Stage 1). Management estimates that ECL is immaterial at reporting dates.

11. Investment securities

	2020 GEL'000	2019 GEL'000
Government treasury bonds	35,878	16,945
Corporate bonds	6,024	3,022
Total investment securities measured at amortized cost	**41,902**	**19,967**

	31 December 2020			31 December 2019		
	Nominal interest rate, %	**Maturity**	**Amount**	**Nominal interest rate,%**	**Maturity**	**Amount**
Debt securities of the Ministry of Finance of Georgia	8.1-11.9	2022-2030	35,878	7.7-12.9	2020-2028	16,945
Corporate bonds (JSC TBC Leasing)	3.3% + 3M TIBR	2023	2,980	-	-	-
Corporate bonds (JSC Nikora)	4% + 3M TIBR	2022	2,020	4% + 3M TIBR	2022	2,000
Corporate bonds (JSC MFO Crystal)	4% + NBG refinancing rate	2021	1,024	4% + NBG refinancing rate	2021	1,022

No investment securities are past due. During the year the Bank has purchased new investment securities of GEL 22,785 thousand and repaid of GEL 1,000 thousand. As at 31 December 2020 the Bank allocates investment securities under Stage 1 for the purposes of identifying expected credit loss under IFRS 9 (31 December 2019: Stage 1). ECL estimation is presented in Note 4.

As at 31 December 2020 Government treasury bonds of GEL 13,150 thousand are pledged to secure the loan from the credit institution (see note 15).

12. Loans to customers

	2020 GEL'000	2019 GEL'000
Loans to corporate customers		
Loans to corporate customers	6,704	7,610
Total loans to corporate customers	**6,704**	**7,610**
Loans to retail customers		
Consumer lending - collateralized	2,700	2,736
Consumer lending - uncollateralized	2,270	1,897
Silkloan Plus	392	1,405
Silkloan	194	1,230
Credit cards	52	449
Micro loan	32	-
Total loans to retail customers	**5,640**	**7,717**
Total gross loans to customers	**12,344**	**15,327**
Loss allowance	(1,401)	(2,180)
Net loans to customers	**10,943**	**13,147**

Information on the credit quality of loans to customers as at 31 December 2020 and 31 December 2019 is disclosed in Note 4.

(a) Analysis of collateral and other credit enhancements

i. Loans to corporate customers

Loans to corporate customers are subject to individual credit appraisal and impairment testing. The general creditworthiness of a corporate customer tends to be the most relevant indicator of credit quality of the loan extended to it. However, collateral provides additional security and the Bank generally requests corporate borrowers to provide it.

The following tables provides information on collateral and other credit enhancements securing loans to corporate customers, net of impairment, by types of collateral:

31 December 2020 **GEL'000**	**Loans to customers, carrying amount**	**Fair value of collateral: for collateral assessed as of reporting date**	**Fair value of collateral: for collateral assessed as of loan inception date**
Loans without individual signs of impairment			
Real estate	196	196	-
Total loans without individual signs of impairment	**196**	**196**	**-**
Loans with significant increase in credit risk			
Real estate	5,087	4,813	-
Total loans with significant increase in credit risk	**5,087**	**4,813**	**-**
Credit-impaired loans			
Real estate	804	804	-
Total credit-impaired loans	**804**	**804**	**-**
Total loans to corporate customers	**6,087**	**5,813**	**-**

31 December 2019 **GEL'000**	**Loans to customers, carrying amount**	**Fair value of collateral: for collateral assessed as of reporting date**	**Fair value of collateral: for collateral assessed as of loan inception date**
Loans without individual signs of impairment			
Real estate	4,914	-	4,914
Inventory	1,525	-	1,525
Total loans without individual signs of impairment	**6,439**	**-**	**6,439**
Loans with significant increase in credit risk			
Real estate	-	-	-
Total loans with significant increase in credit risk	**-**	**-**	**-**
Credit-impaired loans			
Real estate	869	869	-
Total credit-impaired loans	**869**	**869**	**-**
Total loans to corporate customers	**7,308**	**869**	**6,439**

The tables above exclude overcollateralization.

As at 31 December 2019, the Bank has loans, for which the fair value of collateral was assessed at the loan inception date and it was not updated for further changes. For certain loans the fair value of collateral is updated as at the reporting date. Information on the valuation of collateral is based on when this estimate was made, if any. As at 31 December 2020, the fair value of all collateral was updated as at the reporting date.

For loans secured by multiple types of collateral, all types of collateral that are relevant for impairment assessment are disclosed.

The recoverability of loans which are neither past due nor impaired primarily depends on the creditworthiness of borrowers rather than the value of collateral, and the Bank does not necessarily update the valuation of collateral as at each reporting date.

During the period, there was no change in the Bank's collateral policies.

ii. Loans to retail customers

The major part of the retail collateralized loans are secured by real estate. The major part of the retail collateralized loans are secured by real estate with LTV ratio of approximately 44% (31 December 2019: 41%). Approximately 54% of credit-impaired loans were collateralized as at 31 December 2020 (31 December 2019: 23%).

iii. Assets held for sale

As at 31 December 2020 and 2019, assets held for sale comprise from repossessed collateral:

	2020 GEL'000	2019 GEL'000
Real estate	3,740	3,687
Total repossessed collateral	**3,740**	**3,687**

In 2020 the Bank reversed impairment for assets held for sale of GEL 544 thousand recognised in the statement of profit or loss and other comprehensive income. (2019: write down to fair value less cost to sell by GEL 74 thousand).

The Bank's policy is to sell these assets as soon as it is practicable.

(b) Key assumptions and judgments for estimating loan impairment

Key assumptions used by the Bank in estimation of the expected credit loss on loans to customers are as follows:

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

10 % increase (capped to 100%, if applicable) in any of these assumptions, assuming that all other variables remain constant, could affect the expected credit loss on loans to customers for 2020 by amounts in the range of GEL 3 thousand to GEL 170 thousand for retail customers and up to GEL 475 thousand for corporate customers.

(c) Significant credit exposures

As at 31 December 2020 and 2019, the Bank has no borrowers or groups of connected borrowers, whose net loan balances exceed 10% of equity.

(d) Loan maturities

The maturity of the loan portfolio is presented in Note 20(c)(iv), which shows the remaining period from the reporting date to the contractual maturity of the loans.

13. Property and equipment

GEL'000	Land and building	Computer and communication equipment	Fixtures and fittings	Motor vehicles	Other	Total
Cost/revalued amount						
Balance at 1 January 2019	18,032	1,400	975	162	752	21,321
Additions	-	44	-	-	40	84
Disposals	-	(50)	(21)	-	-	(71)
Effect of revaluation	1,051	-	-	-	-	1,051
Balance at 31 December 2019	**19,083**	**1,394**	**954**	**162**	**792**	**22,385**
Balance at 1 January 2020	19,083	1,394	954	162	792	22,385
Additions	-	227	11	-	213	451
Transfer from assets held for sale	381	-	-	-	-	381
Disposals	-	(30)	-	-	-	(30)
Effect of revaluation	921	-	-	-	-	921
Balance at 31 December 2020	**20,385**	**1,591**	**965**	**162**	**1,005**	**24,108**
Depreciation						
Balance at 1 January 2019	-	1,329	927	162	714	3,132
Depreciation for the year	351	94	45	-	42	532
Disposals	-	(35)	(21)	-	-	(56)
Effect of revaluation	(351)	-	-	-	-	(351)
Balance at 31 December 2019	**-**	**1,388**	**951**	**162**	**756**	**3,257**
Balance at 1 January 2020	-	1,388	951	162	756	3,257
Depreciation for the year	354	35	14	-	17	420
Disposals	-	(20)	-	-	-	(20)
Effect of revaluation	(354)	-	-	-	-	(354)
Balance at 31 December 2020	**-**	**1,403**	**965**	**162**	**773**	**3,303**
Carrying amount						
At 31 December 2018	18,032	71	48	-	38	18,189
At 31 December 2019	**19,083**	**6**	**3**	**-**	**36**	**19,128**
At 31 December 2020	**20,385**	**188**	**-**	**-**	**232**	**20,805**

(a) Revalued assets

In 2020 management commissioned Baker Tilly Georgia LLC to independently appraise land and building as at 31 December 2020 which, in accordance with the Bank's accounting policy, is measured at fair value.

As at 31 December 2020, the fair value of buildings was determined to be GEL 20,385 thousand (GEL 19,083 thousand) and reflects market prices in recent transactions. Land and buildings are categorized within level 3 of fair value hierarchy.

The significant unobservable inputs relate to the differences in the characteristics of the properties, such as size, location, access to the properties and conditions for sale. The adjustments related to each of the significant unobservable input above varied between 5% to 15% (2019: 5% to 10%). 5% change in the adjusted market prices used in the valuation would have changed the fair value measurement by GEL 1,020 thousand (2019: GEL 939 thousand).

If the land and buildings were measured using the cost model, the carrying amounts would be as follows:

	2020 GEL'000	2019 GEL'000
Cost	17,323	16,818
Accumulated depreciation	(3,337)	(3,003)
Net carrying amount	**13,986**	**13,815**

14. Current accounts and deposits from customers

	2020 GEL'000	2019 GEL'000
Current accounts	6,284	15,834
Time deposits	1,256	2,085
	7,540	**17,919**

As at 31 December 2020 amounts due to customers of GEL 5,336 thousand (71% of total current accounts and deposits from customers balance) were due to ten largest customers (2019: GEL 12,045 thousand (67%)).

As at 31 December 2020 and 2019, the Bank has no customers, whose balances exceed 10% of equity.

Amounts due to customers include accounts with the following types of customers:

	2020 GEL'000	2019 GEL'000
Individuals:		
- Current accounts	1,394	1,538
- Term deposits	538	1,340
Total due to individuals	**1,932**	**2,878**
Commercial legal entities:		
- Current accounts	4,890	14,296
- Term deposits	718	745
Total due to commercial legal entities	**5,608**	**15,041**
Total amounts due to customers	**7,540**	**17,919**

An analysis of customer accounts by economic sector is as follows:

	2020 GEL'000	2019 GEL'000
Investing activities	2,862	5,026
Individuals	1,932	2,878
Trade and service	1,085	5,202
Real estate	541	592
Construction	124	127
Transportation and communication	28	3,502
Other	968	592
Amounts due to customers	**7,540**	**17,919**

15. Loans from credit institutions

	2020 GEL'000	2019 GEL'000
Loan from the National Bank of Georgia	12,500	-
	12,500	**-**

The loan received from the NBG has maturity on 8 January 2021 and bears annual interest rate of 8.06%. The loan is collateralised with the Government treasury bonds of GEL 13,150 thousand (see note 11).

Reconciliation of movements of liabilities to cash flows arising from financing activities

GEL'000	Loans from financial institutions	Certificate of deposits*	Total
Balance at 1 January 2020	-	-	-
Changes from financing cash flows			
Receipts of loans	199,276	-	199,276
Repayment of loans	(186,776)	-	(186,776)
Proceeds from certificate of deposits	-	1,855	1,855
Total changes from financing cash flows	**12,500**	**1,855**	**14,355**
The effect of changes in foreign exchange rates	**-**	**-**	**-**
Other changes			
Interest expense	441	98	539
Interest paid	(441)	(87)	(528)
Total other changes	**-**	**11**	**11**
Balance at 31 December 2020	**12,500**	**1,866**	**14,366**

*As at 31 December 2020, the outstanding balance of certificate of deposits (CDs) issued to Ministry of Finance of Georgia amounted to GEL 1,866 thousand (31 December 2019: nil). CDs are repayable at maturity, 18 January 2028, and bear annual interest rate of 9.88%.

16. Share capital and reserves

(a) Issued capital and share premium

As at 31 December 2020, share capital of the Bank comprised 611,464 of authorized fully paid shares with nominal value GEL 100 each (2019: 611,464 authorized fully paid shares with the nominal value 100 GEL each)

The share capital of the Bank was contributed by the shareholders in Georgian Lari and they are entitled to dividends and any capital distribution in Georgian Lari.

(b) Nature and purpose of reserves

Revaluation surplus for property and equipment

The revaluation surplus for property and equipment comprises the cumulative positive revalued value of property and equipment after depreciation transfer to retained earnings, until the assets are derecognised or impaired.

(c) Dividends

Dividends payable are restricted to the maximum retained earnings of the Bank, which are determined according to Georgian legislation.

17. Contingencies

(a) Litigation

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

(b) Taxation contingencies

The taxation system in Georgia is relatively new and is characterised by frequent changes in legislation, official pronouncements and court decisions, which are sometimes unclear, contradictory and subject to varying interpretation. In the event of a breach of tax legislation, no liabilities for additional taxes, fines or penalties may be imposed by the tax authorities after three years have passed since the end of the year in which the breach occurred.

These circumstances may create tax risks in Georgia that are more significant than in other countries. Management believes that it has provided adequately for tax liabilities based on its interpretations of applicable Georgian tax legislation, official pronouncements and court decisions. However, the interpretations of the relevant authorities could differ and the effect on these financial statements, if the authorities were successful in enforcing their interpretations, could be significant.

18. Related party transactions

(a) Control relationships

As at 31 December 2020, the Bank’s immediate and ultimate parent company is Silk Road Group Holding (Malta) Limited, which owns 99.99 % of the Bank’s share capital. As at 31 December 2019, the Bank’s immediate parent company was JSC Silk Road Group Finance and the Bank’s ultimate parent was Silk Road Group Holding (Malta) Limited. No publicly available financial statements are produced by Silk Road Group Holding (Malta) Limited.

The Bank’s ultimate controlling party is Georgian businessman Giorgi Ramishvili.

(b) Related party transactions

Total remuneration included in personnel expenses for the years ended 31 December 2020 and 2019 is as follows:

	2020 GEL’000	**2019 GEL’000**
Short-term employee benefits	**1,200**	**656**

The outstanding balances and average effective interest rates as at 31 December 2020 and 2019 for related party transactions are shown below:

	2020 GEL'000	2019 GEL'000
Statement of financial position		
Loans issued -Net carrying amount		
Entities under common control	5,088	5,754
Shareholders	294	324
Key management personnel	14	19
Current accounts and deposits from customers		
Entities under common control	4,007	9,880
Shareholders	32	412
Close family members of management and shareholders	24	25
Key management personnel	19	21
Other	142	236

Loans issued to related parties are mainly long-term and bear average interest rate of 9.0% to 12.0% (2019: mainly long-term, average interest rate from 10.5% to 14.2%). Current accounts and deposits from related parties mainly mature within 1 year and bear average interest rate up to 8.0% (2019: mainly short-term, average interest rate up to 8.5%).

Loans issued to related parties are secured with the collateral with the loan to value ratio from 40% to 112%. Impairment allowance as at 31 December 2020 on loans issued to related parties is GEL 381 thousand (31 December 2019: GEL 123 thousand).

Amounts included in profit or loss in relation to transactions with related parties for the year ended 31 December are as follows:

	2020 GEL'000	2019 GEL'000
Profit or loss		
Interest income	635	710
Interest expense	710	229
Consulting fees	137	160
Fees and commission income	12	50
General administrative expenses	45	42

19. Fair values of financial instruments

The Bank measures fair values using the following fair value hierarchy, which reflects the significance of the inputs used in making the measurements:

- Level 1: quoted market price (unadjusted) in an active market for an identical instrument.
- Level 2: inputs other than quotes prices included within Level 1 that are observable either directly (i.e., as prices) or indirectly (i.e., derived from prices). This category includes instruments valued using: quoted market prices in active markets for similar instruments; quoted prices for similar instruments in markets that are considered less than active; or other valuation techniques where all significant inputs are directly or indirectly observable from market data.
- Level 3: inputs that are unobservable. This category includes all instruments where the valuation technique includes inputs not based on observable data and the unobservable inputs have a significant effect on the instrument's valuation. This category includes instruments that are valued based on quoted prices for similar instruments where significant unobservable adjustments or assumptions are required to reflect differences between the instruments.

The estimated fair values of all financial instruments as at 31 December 2020 and 31 December 2019 approximate their carrying amounts. For the derivative financial instruments, see note 20.

The estimates of fair value are intended to approximate 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. However given the uncertainties and the use of subjective judgment, the fair value should not be interpreted as being realisable in an immediate sale of the assets or transfer of liabilities.

20. Risk management

(a) Corporate governance, internal control policies and procedures

The Bank is required to manage financial risks that arise as a consequence of its operations to deliver its policy objectives as well as in the course of managing the Bank's financial position. The Bank has exposure to the following risks from financial instruments:

- credit risk;
- liquidity risk;
- market risks; and
- operational risk.

Risk is inherent in the Bank's activities but it is managed through a process of ongoing identification, measurement and monitoring, subject to risk limits and other controls. This process of risk management is critical to the Bank's operations and each individual within the Bank is accountable for the risk exposures relating to his or her responsibilities.

The independent risk control process does not include business risks such as changes in the environment, technology and industry. They are monitored through the Bank's strategic planning process.

Risk management structure

The Board of Directors has overall responsibility for the oversight of the risk management framework, overseeing the management of key risks and reviewing its risk management policies and procedures as well as approving significantly large exposures.

The Supervisory Board is ultimately responsible for identifying and controlling risks; however, there are separate independent bodies responsible for managing and monitoring risks. Currently risk is monitored by the following units with the Management Board:

- credit risk is managed by the Credit Risk Committee;
- liquidity risk is managed by ALCO;
- market risk is managed by ALCO;
- operational risk is managed by the Risk Management Department.

(b) Credit risk

Credit risk is the risk that the Bank will incur a loss because its customers, clients or counterparties failed to discharge their contractual obligations. Exposure to credit risk arises as a result of the Bank's lending and other transactions with counterparties giving rise to financial assets.

The Bank 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.

The Bank established two levels of credit committee which is responsible for approving credit limits for individual borrowers. Review and approval limits for each credit committee differs per loan type.

Loan applications originated by the relevant client relationship managers are passed on to the relevant credit committee for approval of credit limit. Exposure to credit risk is also managed, in part, by obtaining collateral and corporate and personal guarantees.

Due to relatively small size of the Bank's operations during the year credit risk exposure is monitored by the Management Board.

The Bank continuously monitors the performance of individual credit exposures and regularly reassesses the creditworthiness of its customers. The review is based on the customer's most recent financial statements and other information submitted by the borrower, or otherwise obtained by the Bank.

The maximum exposure to credit risk from financial assets at the reporting date is as follows:

	2020 GEL'000	2019 GEL'000
ASSETS		
Cash and cash equivalents	4,254	17,243
Amounts due from credit institutions	1,171	2,991
Loans to customers	10,943	13,147
Investment securities	41,902	19,967
Other financial assets	295	350
Total maximum exposure	**58,565**	**53,698**

For the analysis of collateral held against loans to customers and concentration of credit risk in respect of loans to customers, see Note 12.

(c) Liquidity risk and funding management

Liquidity risk is the risk that the Bank will be unable to meet its payment obligations when they fall due under normal and stress circumstances. To limit this risk, the Bank's Management manages assets with liquidity in mind, and monitors future cash flows and liquidity on a daily basis. This incorporates an assessment of expected cash flows and the availability of high grade collateral which could be used to secure additional funding if required.

The Bank maintains a portfolio of state securities that can be pledged to the NBG to obtain financing in the event of demand.

The liquidity position is assessed and managed by the Bank based on certain liquidity ratio established by the National Bank of Georgia. The NBG requires banks to maintain liquidity ratio of more than 100%. As at 31 December 2020 and 2019 the ratio was as follows:

	2020	2019
LCR "Average Liquidity Ratio" (average monthly volume of liquid assets / average monthly volume of liabilities)*	442.76%	336.04%

* This ratio is unaudited.

The following tables show the undiscounted cash flows on financial assets, liabilities on the basis of their earliest possible contractual maturity. The total gross inflow and outflow disclosed in the tables is the contractual, undiscounted cash flow on the financial assets, liability.

The remaining maturity analysis for financial assets and liabilities as at 31 December 2020 is as follows:

GEL'000	On demand and less than 1 month*	1 to 3 months	3 to 12 months	1 to 5 years	More than 5 years	Total gross amount inflow (outflow)	Carrying amount
Cash and cash equivalents	5,631	-	-	-	-	5,631	5,631
Amounts due from credit institutions	1,171	-	-	-	-	1,171	1,171
Investment securities	938	1,145	2,736	33,252	20,875	58,946	41,902
Loans to customers	1,776	488	1,960	6,781	8,644	19,649	10,943
Other financial assets	146	-	149	-	-	295	295
Total financial assets	**9,662**	**1,633**	**4,845**	**40,033**	**29,519**	**85,692**	**59,942**
Loans and borrowings	(12,500)	-	-	-	-	(12,500)	(12,500)
Current accounts and deposits from customers	(7,294)	(17)	(86)	(173)	-	(7,570)	(7,540)
Certificate of deposits	(92)	-	(92)	(733)	(2,313)	(3,230)	(1,866)
Other financial liabilities	(1,592)	(132)	-	-	-	(1,724)	(1,724)
Total financial liabilities	**(21,478)**	**(149)**	**(178)**	**(906)**	**(2,313)**	**(25,024)**	**(23,630)**
Derivative contracts							
- Cash inflow	20,300	10,683	13,240	-	-	44,223	
- Cash outflow	(19,255)	(9,829)	(13,106)	-	-	(42,190)	2,095
Net liquidity gap on recognised financial assets and liabilities	**(10,771)**	**2,338**	**4,801**	**39,127**	**27,206**	**62,701**	**38,407**

*Notwithstanding the net current liability position of the Bank the management believes that the Bank is not exposed to any significant liquidity risk due the following:

- Commercial banks operating in Georgia have option to acquire NBG loans by the amount of 95% of the Government treasury bonds and/or up to 90% of the corporate treasury bonds. Balance of investment securities held by the Bank as at 31 December 2020 amounted GEL 41,902 thousand (see note 11).

- Loan of GEL 12,500 thousand, obtained from the National Bank of Georgia, has contractual maturity of 8 January 2021, but it can be prolonged any time. Furthermore, further NBG financing can be obtained by the Bank (see above). In 2021 the Bank has repaid the above loan of GEL 12,500 thousand and obtained new financing from the NBG, with the similar terms and conditions, keeping the average loan balance with the NBG to GEL 11-15 million in 2021.

- In the unlikely worst-case scenario, the Bank can sell the long-term investment securities either back to the NBG or on the secondary market.

The remaining maturity analysis for financial assets and liabilities as at 31 December 2019 is as follows:

GEL'000	On demand and less than 1 month	1 to 3 months	3 to 12 months	1 to 5 years	More than 5 years	Total gross amount inflow (outflow)	Carrying amount
Cash and cash equivalents	17,243	-	-	-	-	17,243	17,243
Amounts due from credit institutions	2,991	-	-	-	-	2,991	2,991
Loans to customers	740	29	1,965	13,131	13,914	29,779	19,967
Investment securities	381	1,768	2,892	7,663	4,969	17,673	13,147
Other financial asset	235	-	115	-	-	350	350
Total financial assets	**21,590**	**1,797**	**4,972**	**20,794**	**18,883**	**68,036**	**53,698**
Amounts due to credit institutions	(17,391)	(306)	(39)	(193)	-	(17,929)	(17,919)
Other financial liabilities	(580)	(61)	-	-	-	(641)	(641)
Total financial liabilities	**(17,971)**	**(367)**	**(39)**	**(193)**	**-**	**(18,570)**	**(18,560)**
Derivative contracts							
- Cash inflow	27,194	-	7,566	-	-	34,760	
- Cash outflow	(26,871)	-	(7,169)	-	-	(34,040)	720
Net liquidity gap on recognised financial assets and liabilities	**3,942**	**1,430**	**5,330**	**20,601**	**18,883**	**50,186**	**35,858**

Maturity analysis of financial assets and liabilities

The table below shows an analysis of financial assets and liabilities according to when they are contractually due to be recovered or settled.

	2020			2019		
	Within one year	More than one year	Total	Within one year	More than one year	Total
Financial assets						
Cash and cash equivalents	5,631	-	5,631	17,243	-	17,243
Amounts due from credit institutions	1,171	-	1,171	2,991	-	2,991
Loans to customers	1,354	9,589	10,943	2,859	10,288	13,147
Investment securities	1,020	40,882	41,902	1,001	18,966	19,967
Other financial assets	295	-	295	350	-	350
Total	**9,471**	**50,471**	**59,942**	**24,444**	**29,254**	**53,698**
Financial liabilities						
Amounts due to customers	(12,500)	-	(12,500)	-	-	-
Current accounts and deposits from customers	(7,396)	(144)	(7,540)	(17,732)	(187)	(17,919)
Certificate of deposits	-	(1,866)	(1,866)	-	-	-
Other financial liabilities	(1,724)	-	(1,724)	(641)	-	(641)
Total	**(21,620)**	**(2,010)**	**(23,630)**	**(18,373)**	**(187)**	**(18,560)**
Net exposure	**(12,149)**	**48,461**	**36,312**	**6,071**	**29,067**	**35,138**

The Bank's ability to discharge its liabilities relies on its ability to realize an equivalent amount of assets within the same period of time.

(d) Market risk

Market risk is the risk that the fair value or future cash flows of financial instruments will fluctuate due to changes in market variables such as interest rates, foreign exchanges, and equity prices. Except for the concentrations within foreign currency and prepayment risks, the Bank has no significant concentration of market risk.

i. Interest rate risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. As at 31 December 2020 and 2019, the Bank is not materially exposed to the interest rate risk as it does not have material balances of financial assets or liabilities, bearing variable interest rates.

Average effective interest rates

The table below displays average effective interest rates for interest-bearing assets and liabilities as at 31 December 2020 and 2019. These interest rates are an approximation of the yields to maturity of these assets and liabilities.

	2020 Average effective interest rate, %			2019 Average effective interest rate, %		
	GEL	USD	Other currencies	GEL	USD	Other currencies
Interest bearing assets						
Cash and cash equivalents	7.30%	-	-	8.50%	0.62%	-
Loans to customers	15.92%	11.82%	-	23.16%	12.51%	-
Investment securities	9.68%	-	-	9.25%	-	-
Interest bearing liabilities						
Current accounts and deposits from customers	3.69%	1.25%	-	6.06%	0.77%	-
Certificate of deposits	10.95%	-	-	-	-	-
Loans and borrowings	8.06%	-	-	-	-	-

ii. Currency risk

The Bank has assets and liabilities denominated in several foreign currencies.

Currency risk is the risk that the fair value or the future cash flows of a financial instrument will fluctuate because of changes in foreign currency exchange rates. Although the Bank hedges its exposure to currency risk, such activities do not qualify as hedging relationships in accordance with IFRS.

The following table shows the foreign currency exposure structure of financial assets and liabilities as at 31 December 2020:

	USD GEL'000	EUR GEL'000	Total GEL'000
ASSETS			
Cash and cash equivalents	2,828	659	3,487
Amounts due from credit institutions	1,085	86	1,171
Loans to customers	3,580	-	3,580
Other financial assets	218	4	222
Total assets	**7,711**	**749**	**8,460**
LIABILITIES			
Current accounts and deposits from customers	(4,378)	(344)	(4,722)
Other financial liabilities	(509)	(412)	(921)
Total liabilities	**(4,887)**	**(756)**	**(5,643)**
Effect of derivatives*	**(5,900)**	**2,836**	**(3,064)**
Net position	**(3,076)**	**2,829**	**(247)**

The following table shows the foreign currency exposure structure of financial assets and liabilities as at 31 December 2019:

	USD GEL'000	EUR GEL'000	Total GEL'000
ASSETS			
Cash and cash equivalents	13,264	3,076	16,340
Loans to customers	2,342	606	2,948
Amounts due from credit institutions	4,669	-	4,669
Other financial assets	264	-	264
Total assets	**20,539**	**3,682**	**24,221**
LIABILITIES			
Current accounts and deposits from customers	(9,435)	(2,609)	(12,044)
Other financial liabilities	(250)	-	(250)
Total liabilities	**(9,685)**	**(2,609)**	**(12,294)**
Effect of derivatives*	**(12,517)**	**-**	**(12,517)**
Net position	**(1,663)**	**1,073**	**(590)**

* The table below shows the fair values of foreign currency forward contract recorded in other assets (31 December 2019: other assets) together with their notional amounts. The notional amount, recorded gross, is the amount of a financial instrument's underlying asset or liability, reference rate and is the basis upon which changes in the value of financial instruments are measured. The notional amounts indicate the volume of transactions outstanding at the year end and are not indicative of the credit risk.

Included in net gain from foreign currency dealings and forward contracts of GEL 348 thousand in 2020 is the gain from fair value changes on forward exchange contracts of GEL 1,375 thousand (2019: the gain from fair value changes GEL 720 thousand included in net gain from foreign currency dealings and forward contracts of GEL 839 thousand in 2019).

	31 December 2020		31 December 2019	
GEL'000	**Notional amount**	**Fair value**	**Notional amount**	**Fair value**
Foreign currency derivative contract				
Sell USD buy GEL	36,043	1,915	23,228	822
Buy USD sell GEL	(30,964)	180	(10,711)	(102)
Buy EUR sell GEL	(2,012)	-	-	-
Buy EUR sell USD	(824)	-	-	-
Sell USD buy EUR	821	-	-	-
		2,095		**720**

Included in other assets of GEL 3,228 is the fair value of forward exchange contracts of GEL 2,095 thousand (31 December 2019: the fair value of forward exchange contracts GEL 720 thousand included in other assets of GEL 1,818 thousand).

Derivative financial instruments are categorized within level 2 of fair value hierarchy.

The following significant exchange rates have been applied during the year:

in GEL	**Average rate**		**Reporting date spot rate**	
	2020	**2019**	**2020**	**2019**
USD 1	3.1097	2.8192	3.2766	2.8677
EUR 1	3.5519	3.1553	4.0233	3.2095

A weakening of the GEL, as indicated below, against the following currencies at 31 December 2020 and 2019, would have increased (decreased) equity and profit or loss by the amounts shown below. This analysis is on a net-of-tax basis, and is based on foreign currency exchange rate variances that the Bank considered to be reasonably possible at the end of the reporting period. The analysis assumes that all other variables, in particular interest rates, remain constant.

	2020 GEL'000	**2019 GEL'000**
10% appreciation of USD against GEL	(261)	(141)
10% appreciation of EUR against GEL	240	91

A strengthening of the GEL against the above currencies at 31 December 2020 and 2019 would have had the equal but opposite effect on the above currencies to the amounts shown above, on the basis that all other variables remained constant.

(e) Operational risk

Operational risk is the risk of loss arising from systems failure, human error, fraud or external events. When controls fail to perform, operational risks can cause damage to reputation, have legal or regulatory implications, or lead to financial loss. The Bank cannot expect to eliminate all operational risks, but through a control framework and by monitoring and responding to potential risks, the Bank is able to manage the risks. Controls include effective segregation of duties, access, authorisation and reconciliation procedures, staff education and assessment processes, including the use of internal audit.

21. Impact of COVID-19

The outbreak of COVID-19 in early 2020 and its rapid spread in the world has caused substantial impact and changes to the business environment in all countries over the world, including Georgia.

On 11 March 2020, the World Health Organization declared the coronavirus outbreak a pandemic. Responding to the potentially serious threat the COVID-19 presents to public health, the Government of Georgia has taken measures to contain the outbreak, including imposing restrictions on the cross-border movement of people, entry restrictions for foreign visitors and instructing the business community to transfer employees to working from home. To enhance social distancing the schools, restaurants, cinemas and sports activities have stayed suspended for most of the 2020.

At the end of March 2020, the NBG introduced an updated supervisory plan for the Georgian banking sector, aimed at alleviating the negative financial and economic challenges created by the global COVID-19 pandemic in Georgia. The measures, which were introduced with immediate effect, were mainly focused on capital adequacy and liquidity initiatives that allow banks to use existing regulatory capital buffers to support customers in the current financially stressed circumstances, to continue normal business activities as far as possible, and to support the economy through ongoing lending operations. NBG regulations on capital adequacy ratios are disclosed in note 22. Furthermore, through mobilisation of financing from international organisations and though its anti-crisis stimulus plan, the Government announced a series of support measures and packages for individuals and businesses to mitigate the negative economic impact of COVID-19.

COVID-19 outbreak in 2020 had immediate adverse effect on the Bank's operations and resulted in a breach of the Bank's minimum regulatory capital requirement imposed by the NBG (see note 22). Furthermore, in 2020 the Bank incurred net loss on modification of GEL 106 thousand on its loans as a result of providing payment holidays to its customers (see notes 4 and 12). The Bank has introduced a number of resilience protocols and a comprehensive Business Continuity Plan (BCP) aimed at curbing the spread of COVID-19 in Georgia and mitigating the negative impact on its business and the community. The Bank is monitoring the developing economic trends on the back of the COVID-19 pandemic and its impact on the business, customers and employees on an ongoing basis. There is still significant uncertainty over the magnitude of the global slowdown that will result from this pandemic, and the Bank will continue to take appropriate actions to proactively manage evolving circumstances. The directors' assessment of the Bank's liquidity position and future operations is disclosed in note 2 (c) and note 20 (c) of these financial statements.

22. Capital adequacy

The Bank maintains an actively managed capital base to cover risks inherent in the business. The adequacy of the Bank's capital is monitored using, among other measures, the ratios established by the National Bank of Georgia ("NBG") in supervising the Bank.

The primary objectives of the Bank's capital management are (i) to ensure that the Bank complies with externally imposed capital requirements set by the NBG, (ii) to safeguard the Bank's ability to continue as a going concern and is monitored monthly with reports outlining their calculation reviewed and subsequently submitted to the NBG.

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

According to the NBG regulations about capital adequacy (Decree N100/04) on 18 December 2017 the minimum capital requirement ratios have been revised. As at 31 December 2020 and 2019 Common Equity Tier 1 Capital (CET I), Tier I Capital (Tier I) and Total Capital ratios is set at 4.50%, 6.00% and 8.00%, respectively. Capital Conservation and Countercyclical buffers were set at 0% (2019: 2.50% and 0% respectively).

As at 31 December 2020, the Bank had to maintain the currency induced credit risk (CICR) buffer of 0.13% (2019: 0.44%), Risk buffer for credit portfolio concentration of 3.23% (2019: 3.25%) and net GRAPE buffer of 9.7% (2019: 9.7%). All the rest Pillar II buffers were to preserve at nil percent (2019: nil). Under total Basel III requirements the Bank was required to maintain a minimum regulatory capital ratio, Common Equity Tier 1 capital adequacy ratio and Tier 1 capital adequacy ratio of 21.06%, 8.68% and 6.51%, respectively (2019: 23.89%, 11.42% and 9.19%, respectively). The Bank was in compliance with these capital adequacy ratios as at 31 December 2020 and as at 31 December 2019.

The calculation of the capital adequacy ratios in accordance with the NBG accounting rules and capital adequacy Basel III framework as at 31 December 2020 and 31 December 2019:

GEL'000	**2020**	**2019**
Tier 1 capital*	49,016	50,191
Supplementary capital*	174	202
Total regulatory capital*	**49,190**	**50,393**
Risk weighted assets*	**56,341**	**64,897**
Regulatory capital ratio*	87.31%	77.65%
Common Equity Tier 1 capital adequacy ratio / tier 1 capital adequacy ratio*	87.00%	77.34%

*These amounts are unaudited.

As at 31 December 2020 and as at the date these financial statements were authorised for issue, the Bank was in a breach of minimum regulatory capital requirement of GEL 50,000 thousand imposed by the NBG. The Bank has obtained waiver for this breach from NBG till the end of June 2021 – the date when the Bank is required to be in compliance with the minimum regulatory capital requirement.