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centercredit

JOINT STOCK COMPANY
BANK CENTERCREDIT

Separate Financial Statements
for the year ended 31 December 2021

Contents

«КПМГ Аудит» жауапкершілігі
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Independent Auditors' Report

To the Shareholders and Board of Directors of Joint Stock Company Bank CenterCredit

Opinion

We have audited the separate financial statements of Joint Stock Company Bank CenterCredit (the "Bank"), which comprise the separate statement of financial position as at 31 December 2021, the separate statements of profit or loss, 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 separate financial statements present fairly, in all material respects, the unconsolidated financial position of the Bank as at 31 December 2021, and its unconsolidated financial performance and its unconsolidated 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 Separate 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 separate financial statements in the Republic of Kazakhstan, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the International Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

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

Expected credit losses ('ECL') for loans to customers

Please refer to Notes 3 (k), 4 and 16 in the separate financial statements.

The key audit matter	How the matter was addressed in our audit
Loans to customers and banks represent 57% of total assets and are stated net of allowance for expected credit losses ('ECL') that is estimated on a regular basis and is sensitive to assumptions used. The Bank applies ECL valuation models, which require management to apply professional judgement and to make assumptions related to the following key areas: - timely identification of significant increase in credit risk and default events related to loans to customers (allocation between stages 1, 2 and 3 in accordance with the IFRS 9); - assessment of probability of default (PD) and loss given default (LGD); - assessment of expected cash flows forecast for Stage 3 loans, including key assumptions on collateral realisation periods. Due to the significant volume of loans to customers and the related estimation uncertainty in estimating of allowance for ECL, this area is a key audit matter.	We analysed the key aspects of the Bank's methodology and policies related to ECL estimate for compliance with the requirements of IFRS 9, including involvement of our own specialists in financial risks management. To analyse adequacy of professional judgement and assumptions made by the management in relation to allowance for ECL estimate, we performed the following procedures: — For loans to corporate clients we assessed and tested the design and operating effectiveness of the controls over allocation of loans into Stages. — For a sample of loans to corporate clients, for which a potential change in ECL estimate may have a significant impact on the separate financial statements we tested whether Stages are correctly assigned by the Bank by analysing financial and non-financial information, as well as assumptions and professional judgements, applied by the Bank. — For a sample of loans to corporate clients, we tested the correctness of data inputs for PD calculation. — For a sample of Stage 3 loans to corporate clients, where ECL are assessed individually we critically assessed assumptions used by the Bank to forecast future cash flows, including the estimated value of realisable collateral and their expected realization periods based on our understanding of historical experience and planned measures agreed with the regulator to enhance the collection process and publicly available market information. — For loans to individuals we tested the design and operating effectiveness of controls over timely reflection of delinquency events in the underlying systems. — We agreed input data for the model used to assess ECL for loans to individuals to underlying documents and checked whether these loans have been correctly allocated into Stages on a sample basis.

	— We assessed general predictive capability of the models used by the Bank to assess ECL by comparing the estimates made as at 1 January 2021 with actual results for 2021. We also assessed whether the separate financial statements disclosures appropriately reflect the Bank's exposure to credit risk.

Other Information

Management is responsible for the other information. The other information comprises the information included in the Annual Report of the Bank for 2021 but does not include the separate financial statements and our auditors' report thereon. The Annual Report of the Bank for 2021 is expected to be made available to us after the date of this auditors' report.

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

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

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

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

In preparing the separate 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 Separate Financial Statements

Our objectives are to obtain reasonable assurance about whether the separate 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 separate 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 separate financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

— Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the 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 separate financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our 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 separate financial statements, including the disclosures, and whether the separate 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.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate treats or safeguards applied.

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

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

Assel Urdabayeva
Certified Auditor
of the Republic of Kazakhstan,
Auditor's Qualification Certificate
No. МФ-0000096 of 27 August 2012

KPMG Audit LLC

State Licence to conduct audit # 0000021 dated 6 December 2006 issued by the Ministry of Finance of the Republic of Kazakhstan

Sergey Dementyev
General Director of KPMG Audit LLC
acting on the basis of the Charter

20 April 2022

SEPARATE STATEMENT OF PROFIT OR LOSS FOR THE YEAR ENDED 31 DECEMBER 2021
(in millions of Kazakhstani tenge)

	Note	Year ended 31 December 2021	Year ended 31 December 2020
Interest income calculated using the effective interest method		134,576	122,143
Interest expense		(72,279)	(65,329)
Net interest income before expected credit loss allowance on interest-bearing assets	5	**62,297**	**56,814**
Expected credit loss allowance on loans to customers and banks	6	(25,769)	(47,561)
Net interest income		**36,528**	**9,253**
Fee and commission income	7	27,052	24,208
Fee and commission expense	7	(11,179)	(9,165)
Net fee and commission income		**15,873**	**15,043**
Net gain/(loss) on financial instruments at fair value through profit or loss	8	2,640	(225)
Net gain on sale and repayment of financial assets measured at fair value through other comprehensive income		1,409	2,714
Net foreign exchange gain	9	9,233	9,822
Expected credit loss allowance on other financial assets and due from banks		(1,523)	(562)
Impairment loss on other non-financial assets	18	-	(749)
Charge of provision for credit related commitments		(532)	(554)
Other income	18	26	13,868
Net non-interest income		**27,126**	**39,357**
Operating income		63,654	48,610
Operating expenses	10	(44,367)	(38,395)
Operating income before income tax		**19,287**	**10,215**
Income tax expense	11	(387)	(1,647)
Profit for the year		**18,900**	**8,568**
Earnings per share			
Basic (KZT)	24	114.86	74.39
Diluted (KZT)	24	114.86	74.39

These separate financial statements as set out on pages 8 to 88 were approved by the Management Board on 20 April 2022 and were signed on its behalf by:

G.A. Khussainov
Chairman of the Management Board

20 April 2022
Almaty, Kazakhstan

Ye.A. Assylbek
Deputy Chairman of the Management Board, member of Management Board

20 April 2022
Almaty, Kazakhstan

A.T. Nurgaliyeva
Chief Accountant

20 April 2022
Almaty, Kazakhstan

Explanatory notes as set out on pages 15 to 88 form an integral part of these separate financial statements

SEPARATE STATEMENT OF COMPREHENSIVE INCOME FOR THE YEAR ENDED 31 DECEMBER 2021
(in millions of Kazakhstani tenge)

	Year ended 31 December 2021	Year ended 31 December 2020
PROFIT FOR THE YEAR	**18,900**	**8,568**
OTHER COMPREHENSIVE INCOME		
Items that will not be reclassified to profit or loss:		
Revaluation of land and buildings	-	548
Items that are or may be reclassified subsequently to profit or loss:		
Net gain resulting on revaluation of investment securities during the period (net of tax – KZT nil)	(1,626)	4,356
Reclassification adjustment relating to investment securities disposed of during the period (net of tax – KZT Nil)	(1,409)	(2,714)
Total items that are or may be reclassified subsequently to profit or loss	*(3,035)*	*1,642*
OTHER COMPREHENSIVE INCOME FOR THE PERIOD, NET OF INCOME TAX	**(3,035)**	**2,190**
TOTAL COMPREHENSIVE INCOME FOR THE YEAR	**15,865**	**10,758**

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A.T. Nurgaliyeva
Chief Accountant

20 April 2022
Almaty, Kazakhstan

20 April 2022
Almaty, Kazakhstan

20 April 2022
Almaty, Kazakhstan

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SEPARATE STATEMENT OF FINANCAL POSITION AS AT 31 DECEMBER 2021

(in millions of Kazakhstani tenge)

	Note	31 December 2021	31 December 2020
ASSETS:			
Cash and cash equivalents	12	260,602	278,742
Investment securities	13		
Held by the Bank		*438,322*	*281,536*
Pledged under loans from banks		*31,136*	*24,816*
Due from banks	14	6,570	63,426
Investments in subsidiaries	15	52,307	39,138
Loans to customers and banks	16		
Loans to corporate customers		*536,377*	*554,326*
Loans to retail customers		*640,956*	*498,688*
Current income tax assets		208	1,254
Property, plant and equipment and intangible assets	17	29,611	37,623
Other assets	18	70,408	64,981
TOTAL ASSETS		**2,066,497**	**1,844,530**
LIABILITIES AND EQUITY			
LIABILITIES:			
Due to banks and financial institutions	19	55,371	116,915
Customer accounts	20		
Due to corporate customers		*573,587*	*513,257*
Due to retail customers		*782,121*	*676,320*
Debt securities issued	21	108,652	110,326
Deferred income tax liabilities	11	10,587	10,904
Subordinated bonds	22	64,004	62,654
Other liabilities	23	324,888	225,138
TOTAL LIABILITIES		**1,919,210**	**1,715,514**
EQUITY:			
Charter capital	24	65,842	63,436
Fair value reserve for securities		(1,108)	1,927
Property revaluation reserve		354	1,990
Retained earnings		82,199	61,663
Total equity		**147,287**	**129,016**
TOTAL LIABILITIES AND EQUITY		**2,066,497**	**1,844,530**

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20 April 2022
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Almaty, Kazakhstan

A.T. Nurgaliyeva
Chief Accountant

20 April 2022
Almaty, Kazakhstan

Explanatory notes as set out on pages 15 to 88 form an integral part of these separate financial statements.

SEPARATE STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2021

(in millions of Kazakhstani tenge)

	Share capital	Fair value reserve	Revaluation of property, plant and equipment	Retained earnings	Total equity
Balance at 1 January 2020	**59,124**	**285**	**1,442**	**53,095**	**113,946**
Total comprehensive income					
Profit for the year	-	-	-	8,568	8,568
Other comprehensive income					
Items that will not be reclassified to profit or loss:					
Revaluation of land and buildings	-	-	548	-	548
Total items that will not be reclassified to profit or loss	-	-	**548**	-	**548**
Items that are or may be reclassified subsequently to profit or loss:					
Net change in fair value	-	1,642	-	-	1,642
Total items that are or may be reclassified subsequently to profit or loss	-	*1,642*	-	-	*1,642*
Total other comprehensive income	-	1,642	548	-	2,190
Total comprehensive income for the year	-	**1,642**	**548**	**8,568**	**10,758**
Transactions with owners recorded directly in equity					
Treasury shares issued (Note 24)	4,312	-	-	-	4,312
Total transactions with owners	**4,312**	-	-	-	**4,312**
31 December 2020	**63,436**	**1,927**	**1,990**	**61,663**	**129,016**

SEPARATE STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2021

(in millions of Kazakhstani tenge)

	Share capital	Fair value reserve	Revaluation of property, plant and equipment	Retained earnings	Total equity
Balance at 1 January 2021	**63,436**	**1,927**	**1,990**	**61,663**	**129,016**
Total comprehensive income					
Profit for the year	-	-	-	18,900	**18,900**
Other comprehensive income					
Items that are or may be reclassified subsequently to profit or loss:					
Net change in fair value	-	(3,035)	-	-	(3,035)
Total items that are or may be reclassified subsequently to profit or loss		(3,035)	-	-	(3,035)
Total comprehensive income for the year	**-**	**(3,035)**	**-**	**18,900**	**15,865**
Other movements in equity					
Transfer of the amount from revaluation resulting from depreciation and disposals	- -	-	(1,636)	1,636	-
Total other movements in equity	**-**	**-**	**(1,636)**	**1,636**	**-**
Transactions with owners recorded directly in equity					
Treasury shares issued (Note 24)	2,406	-	-	-	2,406
Total transactions with owners	**2,406**	**-**	**-**	**-**	**2,406**
Balance at 31 December 2021	**65,842**	**(1,108)**	**354**	**82,199**	**147,287**

These separate financial statements as set out on pages 8 to 88 were approved by the Management Board on 20 April 2022 and were signed on its behalf by:

G.A. Khussainov
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Ye.A. Assylbek
Deputy Chairman of the Management Board, member of Management Board

A.T. Nurgaliyeva
Chief Accountant

20 April 2022
Almaty, Kazakhstan

20 April 2022
Almaty, Kazakhstan

20 April 2022
Almaty, Kazakhstan

Explanatory notes as set out on pages 15 to 88 form an integral part of these separate financial statements.

SEPARATE STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2021

(in millions of Kazakhstani tenge)

	Year ended 31 December 2021	Year ended 31 December 2020
CASH FLOWS FROM OPERATING ACTIVITIES:		
Interest received	131,710	115,613
Interest paid	(68,566)	(62,292)
Services fee and commission received	28,395	24,208
Services fee and commission paid	(10,259)	(8,056)
Net proceeds from /(payments on) derivative instrument transactions	2,640	(225)
Net foreign exchange gain	6,636	8,430
Other income (expenses)/receipts (payments)	(680)	762
Dividends received	932	3,851
Operating expenses paid	(39,998)	(35,591)
Cash flow from operating activities before changes in operating assets and liabilities	**50,810**	**46,700**
Change in operating assets:		
Due from banks	57,089	(57,270)
Loans to customers and banks	(56,540)	40,962
Other assets	(2,311)	(2,525)
Change in operating liabilities:		
Due to banks and financial institutions	(61,632)	39,468
Customer accounts	153,834	189,642
Other liabilities	(2,037)	(3,591)
Cash flows from operating activities before tax	**139,213**	**253,386**
Income tax paid	-	-
Net cash flows from operating activities	**139,213**	**253,386**
CASH FLOWS FROM INVESTING ACTIVITIES:		
Proceeds from repayment and sale of investment securities	612,282	206,687
Acquisition of investment securities	(766,978)	(336,751)
Acquisition of property, plant and equipment and intangible assets	(4,077)	(6,366)
Proceeds from sale of property, plant and equipment	50	57
Contributions to charter capital of the subsidiaries	(4,000)	(10,638)
Net cash flows used in investing activities	**(162,723)**	**(147,011)**

SEPARATE STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2021
(in millions of Kazakhstani tenge)

	Year ended 31 December 2021	Year ended 31 December 2020
CASH FLOWS FROM FINANCING ACTIVITIES:		
Proceeds from treasury shares issued, net	2,406	4,312
Proceeds from debt securities issued	5,300	-
Repurchase and repayment of debt securities issued	(8,418)	(8,960)
Net cash used in financing activities	**(712)**	**(4,648)**
Effect of changes in foreign exchange rate fluctuations on cash and cash equivalents	6,082	18,359
NET (DECREASE)/INCREASE IN CASH AND CASH EQUIVALENTS	**(18,140)**	**120,086**
CASH AND CASH EQUIVALENTS, beginning of the year	278,742	158,656
CASH AND CASH EQUIVALENTS, end of the year (Note 12)	**260,602**	**278,742**

These separate financial statements as set out on pages 8 to 88 were approved by the Management Board on 20 April 2022 and were signed on its behalf by:

G.A. Khussainov
Chairman of the Management Board

20 April 2022
Almaty, Kazakhstan

Ye.A. Assylbek
Deputy Chairman of the Management Board, member of Management Board

20 April 2022
Almaty, Kazakhstan

A.T. Nurgaliyeva
Chief Accountant

20 April 2022
Almaty, Kazakhstan

(in millions of Kazakhstani tenge, unless otherwise stated)

1. INTRODUCTION

(a) Principal activity

JSC Bank CenterCredit (the "Bank") is a Joint Stock Company, which has been incorporated and carrying out its operations in the Republic of Kazakhstan since 1988. The Bank is regulated by the legislation of the Republic of Kazakhstan. The Agency of the Republic of Kazakhstan for Regulation and Development of Financial Market (the "AFM") is a regulatory authority of the Bank. The Bank conducts its business under the license number 1.2.25/195/34, renewed on 3 February 2020.

The Bank's principal activity consists of commercial banking activities, trading with securities, foreign currencies and derivative instruments, loan origination activities and guarantees.

The Bank is a member of the Kazakhstan Deposit Insurance Fund (the "KDIF").

The registered address is 38, Al Farabi Ave., Almaty, Republic of Kazakhstan.

As at 31 December 2021 and 31 December 2020, the Bank had 19 branches in the Republic of Kazakhstan.

As at 31 December 2021 and 2020, the number of ordinary shares was allocated as follows:

	31 December 2021 %	31 December 2020 %
B.R. Baiseitov	50.16	52.56
V.S. Lee	11.55	11.43
D.R. Amankulov	3.55	3.71
Other (individually hold less than 5%)	34.74	32.30
	100.00	**100.00**

During 2021, as part of the additional capitalisation, the Bank placed 8,019,136 ordinary shares for the amount of KZT 2,405,740,800.

During 2020, as part of the additional capitalisation, the Bank placed 14,371,988 ordinary shares for the amount of KZT 4,311,596,400

The separate financial statements were authorised for issue by the Management Board of JSC Bank CenterCredit on 20 April 2022.

(b) Kazakhstan business environment

The Bank's operations are primarily located in Kazakhstan. Consequently, the Bank is exposed to the economic and financial markets of Kazakhstan 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 Kazakhstan. Volatility in the global price of oil and the COVID-19 pandemic have also increased the level of uncertainty in the business environment. The ongoing armed conflict in Ukraine has further increased uncertainty about the Kazakhstan business environment.

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

State of emergency

On 2 January 2022 protests started in Western Kazakhstan related to an increase in the LNG price from 60 tenge per litre to 120 tenge per litre. These protests spread to other cities and resulted in looting and loss of life. On 5 January the government declared a state of emergency. As a result of the above protests and state of emergency the President of Kazakhstan has made certain public announcements regarding possible measures including additional taxes.

On 19 January 2022 the state of emergency was lifted. The Bank is currently unable to quantify what the impact, if any, may be on the financial position of any new measures the government may take or any impact from the effect on the Kazakhstan economy as a result of the above protests and state of emergency.

The separate financial statements reflect management's assessment of the impact of the Kazakhstan business environment on the operations and the 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 separate financial statements are prepared in accordance with International Financial Reporting Standards (IFRS). The Bank also prepares consolidated financial statements for the year ended 31 December 2021 in accordance with IFRS that can be obtained from the Bank's registered office.

(b) Basis of measurement

The separate financial statements are prepared on the historical cost basis except that financial instruments at fair value through profit or loss and at fair value through other comprehensive income are stated at fair value and buildings and constructions are measured at fair value, which increase is stated in the revaluation property reserve.

(c) Functional and presentation currency

The functional currency of the Bank is the Kazakhstan tenge (KZT) as, being the national currency of the Republic of Kazakhstan, it reflects the economic substance of the majority of underlying events and circumstances relevant to them.

The KZT is also the presentation currency for the purposes of these separate financial statements.

Financial information presented in KZT is rounded to the nearest million.

(d) Use of estimates and judgments

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

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

Judgements

Information about judgements made in applying accounting policies that have the most significant effects on the amounts recognised in the separate financial statements is included in the following notes:

- classification of financial assets: assessment of the business model within which the assets are held and assessment of whether the contractual terms of the financial asset are solely payments of principal and interest on the principal amount outstanding – Note 3(f)(i);
- 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 – Note 4.

Assumptions and estimations uncertainty

Information about assumptions and estimation uncertainties that have a significant risk of resulting in a material adjustment in the separate financial statements for the year ended 31 December 2021 is included in the following notes:

- impairment of financial instruments: determining inputs into the ECL measurement model, including incorporation of forward-looking information – Note 4;
- estimates of impairment of loans to customers – Note 16;
- estimates of fair value of foreclosed collateral – Note 18;
- estimates of fair value of financial assets and liabilities for disclosure purposes – Note 31.

3. SIGNIFICANT ACCOUNTING POLICIES

The accounting policies set out below have been applied consistently to all periods presented in these separate financial statements.

(a) Accounting for investments in subsidiaries in separate financial statements

Subsidiaries are investees controlled by the Bank. The Bank controls an investee when it is exposed to, or has rights to, variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee. Investments in subsidiaries are stated at cost less impairment in the separate financial statements of the Bank.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(b) Interest income and expense

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. The effective interest rate is also revised for fair value hedge adjustments at the date amortisation of the hedge adjustment begins.

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 clause (k).

Dividend income is recognised in profit or loss on the date that the dividend is declared.

Presentation

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

- interest on financial assets measured at amortised cost;
- interest on debt instruments measured at FVOCI.

Other interest income presented in the separate statement of profit or loss includes interest income on non-derivative debt financial instruments measured at FVTPL.

Interest expense presented in the separate statement of profit or loss and other comprehensive income includes:

- interest expense on financial liabilities measured at amortised cost.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(c) Fee and commission income and expense

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

Other fee and commission income – including account servicing fees, investment management fees, sales commission, placement fees and syndication fees – is recognised as the related services are performed. 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.

The contract with a customer, which resulted in a financial instrument recognised in the separate financial statements of the Bank may be partially within the scope of IFRS 9 and partially within the scope of IFRS 15. In this case, the Bank first applies IFRS 9 to separate and measure the part of the contract, which is within the scope of IFRS 9 and then applies IFRS 15 to the remaining part of the contract.

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

(d) Foreign currency

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 at the reporting date are translated to the functional currency at the exchange rate at that 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 retranslated to the functional currency at the exchange rate at the date that the fair value is determined. Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rate at the date of the transaction.

Foreign currency differences arising on translation to foreign currencies are recognised in profit or loss, except for differences arising on translation of available-for-sale equity instruments, with exception of foreign currency differences arising from impairment of such instruments, in which case foreign currency differences classified as other comprehensive income will be reclassified to profit and loss.

The exchange rates used by the Bank in the preparation of the separate financial statements as at year-end are as follows:

	31 December 2021	31 December 2020
KZT/EUR	489.10	516.79
KZT/USD	431.80	420.91

(e) Cash and cash equivalents

Cash and cash equivalents include notes and coins on hand, unrestricted balances (nostro accounts) held with the NBRK and other banks and highly liquid financial assets with original maturities of less than three months, which are subject to insignificant risk of changes in their fair value, and are used by the Bank in the management of short-term commitments. Cash equivalents are carried at amortised cost in the separate statement of financial position.

(f) Financial instruments

(i) Classification

On initial recognition, a financial asset is classified as measured at: amortised cost, fair value through other comprehensive income (FVOCI) and fair value through profit or loss (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 on the principal amount outstanding.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(f) Financial instruments, continued

(i) Classification, continued

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 solely payments of principal and interest on the principal amount outstanding.

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

- interest revenue using the effective interest method;
- expected credit losses and reversals; and
- foreign exchange gains and losses.

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

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

Gains and losses on such equity instruments are never reclassified to profit or loss and no impairment is recognised in profit or loss. Dividends are recognised in profit or loss unless they clearly represent a recovery of part of the cost of the investment, in which case they are recognised in other comprehensive income. Cumulative gains and losses recognised in other comprehensive income are transferred to retained earnings on disposal of an investment.

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.
- 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.

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.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(f) Financial instruments, continued

(i) Classification, continued

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 solely payments of principal and interest, the Bank considers the contractual terms of the instrument. This includes assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition. 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);
- features that modify consideration of the time value of money – e.g. periodical reset of interest rates.

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

Reclassification

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 assets – subsequent measurement, gains and losses

Financial assets at FVTPL	These assets are subsequently measured at fair value. Net gains and losses, including any interest or dividend income, are recognised in profit or loss.
Financial assets measured at amortised cost	These assets are subsequently measured at amortised cost using the effective interest method. The amortised cost is reduced by impairment losses. Interest income, foreign exchange gains and losses and impairment are recognised in profit or loss. Any gain or loss on derecognition is recognised in profit or loss.
Debt investments at FVOCI	These assets are subsequently measured at fair value. Interest income calculated using the effective interest method, foreign exchange gains and losses and impairment are recognised in profit or loss. Other net gains and losses are recognised in OCI. On derecognition, gains and losses accumulated in OCI are reclassified to profit or loss.

(ii) 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.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(f) Financial instruments, continued

(ii) Modification of financial assets and financial liabilities, continued

Financial assets, continued

Changes in cash flows on existing financial assets or financial liabilities are not considered as modification, if they result from existing contractual terms, e.g. changes in interest rates initiated by the Bank due to changes in the NBRK key rate, if the loan contract entitles the Bank to do so.

The Bank performs a quantitative and qualitative evaluation of whether the modification is substantial, i.e. whether the cash flows of the original financial asset and the modified or replaced financial asset are substantially different. The Bank assesses whether the modification is substantial based on quantitative and qualitative factors in the following order: qualitative factors, quantitative factors, combined effect of qualitative and quantitative factors. If the cash flows are substantially different, then the contractual rights to cash flows from the original financial asset deemed to have expired. In making this evaluation the Bank analogizes to the guidance on the derecognition of financial liabilities.

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

- change the currency of the financial asset;
- change in collateral or other credit enhancement;
- inclusion of conversion feature.

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 the 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. For floating-rate financial assets, the original effective interest rate used to calculate the modification gain or loss is adjusted to reflect current market terms at the time of the modification. Any costs or fees incurred and fees received as part of the modification adjust the gross carrying amount of the modified financial asset and are amortised over the remaining term of the modified financial asset.

If such a modification is carried out because of financial difficulties of the borrower (see Note 3(k)), 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 assesses whether the modification is substantial based on quantitative and qualitative factors in the following order: qualitative factors, quantitative factors, combined effect of qualitative and quantitative factors. The Bank concludes that the modification is substantial as a result of the following qualitative factors:

- change in the currency of the financial liability;
- change in collateral or other credit enhancement;
- inclusion of conversion feature;
- change in the subordination of the financial liability.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(f) Financial instruments, continued

(ii) Modification of financial assets and financial liabilities, continued

Financial liabilities, continued

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.

(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.

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

In transactions in which the Bank neither retains nor transfers substantially all of the risks and rewards of ownership of a financial asset and it retains control over the asset, the Bank continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset. Examples of such transaction are the contracts of rights of claims to loans signed with Kazakhstan Sustainability Fund JSC (Note 16).

If the Bank continues recognising asset to the extent of its continuing involvement, the Bank also recognises a related liability. A transferred assets and liability related to it are measured on the basis, which reflects those rights and liabilities, which the Bank has retained. An asset-related liability is measured so that the net carrying amount of the transferred asset and liability related to it represent an amortised cost of the rights and liabilities retained by the Bank.

The Bank continues to recognise income arising on the transferred asset to the extent of its continuing involvement and recognises expense incurred on the associated liability.

If the transferred asset is measured at amortised cost, the associated financial liability may not be designated as at fair value through profit or loss.

Financial liabilities

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

(iv) Fair value measurement principles

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 available, the Bank measures the fair value of an instrument using quoted prices 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.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(f) Financial instruments, continued

(iv) Fair value measurement principles, continued

When there is no quoted price in an active market, 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 the factors that market participants would take into account in these circumstances.

The best evidence of the fair value of a financial instrument at 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 at 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 that uses only data from observable markets, the financial instrument is initially measured at fair value, adjusted to defer the difference between the fair value at 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 supported wholly by observable market data or the transaction is closed out. If an asset or a liability measured at fair value has a bid price and an ask price, the Bank measures assets and long positions at the bid price and liabilities and short positions at the ask price.

(v) Repurchase and reverse repurchase agreements

Securities sold under sale and repurchase (repo) agreements are accounted for as secured financing transactions, with the securities retained in the separate statement of financial position and the counterparty liability included in amounts payable under repo transactions within balances and loans from banks and financial institutions. The difference between the sale and repurchase prices represents interest expense and is recognised in profit or loss over the term of the repo agreement using the effective interest method.

Securities purchased under agreements to resell (reverse repo) are recorded as amounts receivable under reverse repo transactions within loans to customers and banks. The difference between the purchase and resale prices represents interest income and is recognised in profit or loss over the term of the reverse repo agreement using the effective interest method.

If assets purchased under an agreement to resell are sold to third parties, the obligation to return securities is recorded as a trading liability and measured at fair value.

(vi) Offsetting

Financial assets and liabilities are offset and the net amount presented in the statement of financial position when, and only when, the Bank currently has a legal right to offset the amounts and intends either to settle on a net basis or to realise the asset and settle the liability simultaneously. The Bank currently has a legally enforceable right to set off if that right is not contingent on a future event and enforceable both in the normal course of business and in the event of default, insolvency or bankruptcy of the Bank and all counterparties.

(g) Due from banks, loans to customers

'Due from banks' and 'Loans to customers' captions in the separate statement of financial position include:

- Due from banks and loans to customers and banks measured at amortised cost (see Note 3(f)(i)); they are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortised cost using the effective interest method.

(h) Investment securities

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

- debt investment securities measured at amortised cost; these are initially measured at fair value plus incremental direct transaction costs, and subsequently at their amortised cost using the effective interest method;
- debt and equity investment securities mandatorily measured at FVTPL or designated as at FVTPL; these are measured at fair value with changes recognised immediately in profit or loss;
- debt securities measured at FVOCI; and
- equity investment securities designated as at FVOCI.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(i) Property, plant and equipment and intangible assets

(i) Owned assets

Items of property and equipment are stated in the separate financial statements at cost less accumulated depreciation and impairment losses, except for buildings and constructions, which are stated at revalued amounts as described below.

Where an item of property, plant and equipment comprises major components having different useful lives, they are accounted for as separate items of property, plant and equipment.

Buildings and constructions are subject to revaluation on a regular basis. The frequency of revaluation depends on the movements in the fair values of the buildings being revalued. A revaluation increase on the buildings falling within the category "Buildings and constructions" is recognised as other comprehensive income except to the extent that it reverses a previous revaluation decrease recognised in profit or loss, in which case it is recognised in profit or loss. A revaluation decrease on the buildings falling within the category "Buildings and constructions" is recognised in profit or loss except to the extent that it reverses a previous revaluation increase recognised as other comprehensive income directly in equity, in which case it is recognised in other comprehensive income.

(ii) Intangible assets

Acquired intangible assets are stated at cost less accumulated amortisation and impairment losses.

Acquired computer software licenses are capitalised on the basis of the costs incurred to acquire and bring to use the specific software.

(iii) Depreciation and amortisation

Depreciation on property, plant and equipment and amortisation of intangible assets is charged to profit or loss on a straight-line basis over the estimated useful lives of the individual assets. Depreciation commences on the date of acquisition or, in respect of internally constructed assets, from the time an asset is completed and ready for use. Land is not depreciated.

Depreciation is charged at the following annual rates:

Buildings and other constructions	1.25-2.50%
Furniture and computer equipment	5.60-20.00%
Intangible assets	6.67-100.00%

(j) Due to banks and financial institutions, deposits and customer accounts, debt securities issued and subordinated bonds

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

(k) 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;
- financial guarantee contracts issued;
- loan commitments issued; and
- loan commitments issued.

No impairment loss is recognised on equity investments.

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

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(k) Impairment, continued

The Bank considers a debt security to have low credit risk when its credit risk rating is equivalent to the globally understood definition of 'investment grade'.

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.

Lifetime ECLs are the ECLs that result from all possible default events over the expected life of the financial instrument. Financial instruments, other than purchased or originated credit-impaired assets, for which a lifetime ECL is recognised are referred to as 'Stage 2' financial instruments (if the credit risk has increased significantly since initial recognition, but the financial instruments are not credit-impaired) and 'Stage 3' financial instruments (if the financial instruments are credit-impaired).

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 Bank 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;
- *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; and
- *financial guarantee contracts*: the present value of expected payments to reimburse the holder less any amounts that the Bank expects to recover.

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 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.
- 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 and debt financial assets carried at FVOCI are credit-impaired. 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:

- significant financial difficulty of the borrower or issuer;
- a breach of contract such as a default or past due event;
- the restructuring of a loan or advance by the Bank on terms that the Bank would not consider otherwise;
- it is becoming probable that the borrower will enter bankruptcy or other financial reorganisation; or
- the disappearance of an active market for a security because of financial difficulties.

A loan that has been renegotiated due to a deterioration in the borrower's condition is usually considered to be credit-impaired unless there is evidence that the risk of not receiving contractual cash flows has reduced significantly and there are no other indicators of impairment. In addition, the loans that are overdue for 90 days or more are considered credit-impaired.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(k) Impairment, continued

Credit-impaired financial assets, continued

In making an assessment of whether an investment in sovereign debt (other financial assets) is credit-impaired, the Bank considers the following factors:

- The market's assessment of creditworthiness as reflected in the bond yields.
- The rating agencies' assessments of creditworthiness.
- The country's ability to access the capital markets for new debt issuance.
- The probability of debt being restructured, resulting in holders suffering losses through voluntary or mandatory debt forgiveness.
- The international support mechanisms in place to provide the necessary support as 'lender of last resort' to that country, as well as the intention, reflected in public statements, of governments and agencies to use those mechanisms. This includes an assessment of the depth of those mechanisms and, irrespective of the political intent, whether there is the capacity to fulfil the required criteria.

Presentation of allowance for ECL in the separate financial statements

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

- *financial assets measured at amortised cost*: as a deduction from the gross carrying amount of the assets;
- *loan commitments and financial guarantee contracts*: generally, as a provision;
- *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 (loan issued). Any excess of the loss allowance over the gross amount of the drawn component (loan issued) is presented as a provision; and
- *debt instruments measured at FVOCI*: no loss allowance is recognised in the separate statement of financial position because the carrying amount of these assets is their fair value. However, the loss allowance is disclosed and is recognised in the fair value reserve.

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 losses on debt financial assets' in the separate 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.

Non-financial assets

Other non-financial assets, other than deferred tax assets, are reviewed at each reporting date to determine whether there is any indication of impairment. The recoverable amount of goodwill is estimated at each reporting date. The recoverable amount of non-financial assets is the greater of their fair value less costs to sell and value in use. 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.

For an asset that does not generate cash inflows largely independent of those from other assets, the recoverable amount is determined for the cash-generating unit to which the asset belongs. An impairment loss is recognised when the carrying amount of an asset or its cash-generating unit exceeds its recoverable amount.

All impairment losses in respect of non-financial assets are recognised in profit or loss and reversed only if there has been a change in the estimates used to determine the recoverable amount. Any impairment loss reversed is only reversed to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortisation, if no impairment loss had been recognised in the separate financial statements. An impairment loss in respect of goodwill is not reversed.

Accounts receivable under the joint cooperation agreement were measured at fair value as at the signing date (Note 18).

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(l) Provisions

A provision is recognised in the separate statement of financial position when the Bank has a legal or constructive obligation as a result of a past event, and it is probable that an outflow of economic benefits will be required to settle the obligation. If the amount of such liability is significant, provisions are determined by discounting the expected future cash flows at a pre-tax rate that reflects current market assessments of the time value of money and the risks specific to the liability.

(m) Financial guarantees and loan commitments

In the normal course of business, the Bank enters into credit related commitments, comprising undrawn loan commitments, letters of credit and guarantees, and provides other forms of credit insurance.

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

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

The Bank has issued no loan commitments that are measured at FVTPL. For other loan commitments: the Bank recognises a loss allowance.

(n) Share capital

(i) Ordinary shares

Ordinary shares are classified as equity. Incremental costs directly attributable to issue of ordinary shares and share options are recognised as a deduction from equity, net of any tax effects.

(ii) Preference shares

Preference share capital that is non-redeemable and carries no mandatory dividends is classified as equity.

(iii) Repurchase of share capital

When share capital recognised as equity is repurchased, the amount of the consideration paid, including directly attributable costs, is recognised as a decrease in equity.

(iv) Dividends

The ability of the Bank to declare and pay dividends is subject to the rules and regulations of Kazakh legislation.

Dividends in relation to ordinary shares are reflected as an appropriation of retained earnings in the period when they are declared.

(o) Taxation

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

Current tax

Current tax expense is the expected tax payable on the taxable income for the year, using tax rates 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.

Deferred tax

Deferred tax is recognised 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 not recognised for the following temporary differences:

- temporary differences on the initial recognition of goodwill not deductible for tax purposes;
- temporary differences on the initial recognition of assets or liabilities in a transaction that is not a business combination and that affects neither accounting nor taxable profit or loss;
- temporary differences related to investments in subsidiaries, associates and joint arrangements to the extent that where the Bank is able to control the timing of the reversal of the temporary differences and it is probable that they will not reverse in the foreseeable future.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(o) Taxation, continued

Deferred tax, continued

Deferred tax assets are recognised for unused tax losses, unused tax credits and deductible temporary differences to the extent that it is probable that future taxable profits will be available against which they can be used. Future taxable profits are determined based on the reversal of relevant taxable temporary differences. Deferred tax assets are reviewed at each reporting date and are reduced to the extent that it is no longer probable that the related tax benefit will be realised; such reductions are reversed when the probability of future taxable profits improves.

Unrecognised deferred tax assets are reassessed at each reporting date and recognised to the extent that it has become probable that future taxable profits will be available against which they can be used.

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 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 and liabilities are offset if there is a legally enforceable right to offset current tax assets and liabilities, and they relate to income taxes levied by the same tax authority on the same taxable entity, or on different tax entities, but they intend to settle current tax liabilities and assets on a net basis or their tax assets and liabilities will be realised simultaneously.

(p) Segment reporting

An operating segment is a component of the Bank that engages in business activities from which it may earn revenues and incur expenses (including revenues and expenses related to transactions with other components of the Bank); whose operating results are regularly reviewed by the chief operating decision maker to make decisions about resources to be allocated to the segment and assess its performance, and for which discrete financial information is available.

(r) Leases

At inception of a contract, the Bank assesses whether a contract is, or contains, a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Bank uses the definition of a lease in IFRS 16.

As a lessee

At commencement or on modification of a contract that contains a lease component, the Bank allocates the consideration in the contract to each lease component on the basis of its relative stand-alone price. The Bank recognises a right-of-use asset and a lease liability at the lease commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of costs to dismantle and remove the underlying asset or to restore the underlying asset or the site on which it is located, less any lease incentives received.

The right-of-use asset is subsequently depreciated using the straight-line method from the commencement date to the end of the lease term, unless the lease transfers ownership of the underlying asset to the Bank by the end of the lease term or the cost of the right-of-use asset reflects that the Bank will exercise a purchase option. In that case the right-of-use asset will be depreciated over the useful life of the underlying asset, which is determined on the same basis as those of property and equipment. In addition, the right-of-use asset is periodically reduced by impairment losses, if any, and adjusted for certain remeasurements of the lease liability.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, the Bank's incremental borrowing rate. Generally, the Bank uses its incremental borrowing rate as the discount rate.

The Bank determines its incremental borrowing rate by obtaining interest rates from various external and internal financing sources and makes certain adjustments to reflect the terms of the lease and type of the asset leased.

The lease liability is measured at amortised cost using the effective interest method. It is remeasured when there is a change in future lease payments arising from a change in an index or rate, if there is a change in the Bank's estimate of the amount expected to be payable under a residual value guarantee, if the Bank changes its assessment of whether it will exercise a purchase, extension or termination option or if there is a revised in-substance fixed lease payment.

When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the right-of-use asset, or is recorded in profit or loss if the carrying amount of the right-of-use asset has been reduced to zero.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(r) Leases, continued

As a lessee, continued

However, for leases of property the Bank has elected not to separate non-lease components and account for the lease and associated non-lease components as a single lease component.

The lease term of the contracts valid during the reporting period ends within 12 months of the date of initial application, such leases do not contain extension options, and the Bank will not be subject to significant economic penalties, if the Bank fails to extend lease for the subsequent 12-month term.

(s) New standards and interpretations not yet adopted

A number of new standards are effective for annual periods beginning after 1 January 2021 and earlier application is permitted; however, the Bank has not early adopted the new or amended standards in preparing these financial statements.

The following amended standards and interpretations are not expected to have a significant impact on the Bank's separate financial statements.

- *Onerous contracts – Cost of Fulfilling a Contract (Amendments to IAS 37).*
- *Deferred Tax related to Assets and Liabilities arising from a Single Transaction (Amendments to IAS 12).*
- *COVID-19-Related Rent Concessions beyond 30 June 2021 (Amendment to IFRS 16).*
- *Annual Improvements to IFRS Standards 2018–2020.*
- *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).*
- Disclosure of Accounting Policies (Amendments to IAS 1 and IFRS Practice Statement 2).
- *Definition of Accounting Estimates (Amendments to IAS 8).*

Amendments to the Standards effective from 1 January 2021 have not had an effect on the Company's financial statements.

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 26 to the Bank's separate financial statements for the year ended 31 December 2021.

Credit risk - Amounts arising from ECL

See accounting policy in Note 3(k).

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 informed credit assessment and including forward-looking information.

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

- the remaining lifetime probability of default (PD) as at the 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 relevant for changes in prepayment expectations).

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

- quantitative test based on movement in probability of default (PD);
- qualitative indicators; and
- backstop of 30 days past due.

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Significant increase in credit risk, continued

Credit risk grades

The Bank allocates each exposure to a credit risk grade based on a variety of data that is determined to be predictive of the risk of default and applying experienced credit judgement. Credit risk grads are defined using qualitative and quantitative factors that are indicative of the risk of default. These factors may vary depending on the nature of the exposure and the type of a borrower.

Credit risk grades are defined and calibrated such that the risk of default occurring increases exponentially as the credit risk deteriorates so, for example, the difference in risk of default between credit risk grades 1 and 2 is smaller than the difference between credit risk grades 2 and 3.

Each exposure is allocated to a credit risk grade at initial recognition based on available information about the borrower. Exposures are subject to ongoing monitoring, which may result in an exposure being moved to a different credit risk grade. The monitoring typically involves use of the following data.

Corporate exposure	All exposures (corporate and retail exposures)
• Information obtained during periodic review of customer files – e.g. audited financial statements, management accounts, budgets and projections. Examples of areas of particular focus are: gross profit margins, financial leverage ratios, debt service coverage, compliance with covenants, quality of management, senior management changes.	• Payment record – this includes overdue status as well as a range of variables about payment ratios
• Data from credit reference agencies, press articles, changes in external credit ratings	• Utilisation of the granted limit. • Requests for and granting of forbearance.
• Quoted bond and credit default swap (CDS) prices for the issuer where available.	• Existing and forecast changes in business, financial and economic conditions.
• Actual and expected significant changes in the political, regulatory and technological environment of the borrower or in its business activities	

Generating the term structure of PD

Credit risk grades are a primary input into the determination of the term structure of PD for exposures. The Bank collects performance and default information about its credit risk exposures analysed by jurisdiction or region and by type of product and borrower as well as by credit risk grading.

The Bank employs statistical models to analyse the data collected and generate estimates of the remaining lifetime PD of exposures and how these are expected to change as a result of the passage of time.

This analysis includes the identification and calibration of relationships between changes in default rates and changes in key macro-economic factors as well as in-depth analysis of the impact of certain other factors (e.g. forbearance experience) on the risk of default. For the majority of exposures the key driver would be GDP forecast growth.

The Bank uses expert judgment in assessment of forward-looking information. This assessment is based also on external information (see discussion below on incorporation of forward-looking information). The Bank then uses these forecasts to adjust its estimates of PDs.

The criteria for determining whether credit risk has increased significantly vary depending on different types of lending, in particular between corporate and retail, as well as by portfolio and include both quantitative changes in PDs and qualitative factors, including a backstop based on delinquency.

Credit risk of a particular exposure is deemed to have increased significantly since initial recognition if, based on the Bank's quantitative modelling, it is determined that there are the objective factors resulting in deterioration of financial and economic position of the counteragent. When determining whether credit risk has increased significantly, remaining lifetime ECLs are adjusted for changes in maturity.

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Significant increase in credit risk, continued

Determining whether credit risk has increased significantly

The credit risk may also be deemed to have increased significantly since initial recognition based on qualitative factors linked to the Bank's credit risk management processes that may not otherwise be fully reflected in its quantitative analysis on a timely basis. This will be the case for exposures that meet certain heightened risk criteria, such as placement on a watch list, restructuring feature that results in transfer to Stage 3. Such qualitative factors are based on its expert judgment and relevant historical experience.

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 or, for inter-bank amounts owed and securities, more than 7 days past due. Days past due are determined by counting the number of days since the earliest elapsed 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 to being measured as 12-month ECL. Some qualitative indicators of an increase in credit risk, such as delinquency of forbearance, may be indicative of an increased risk of default that persists after the indicator itself has ceased to exist. In these cases, the Bank determines a probation period during which the financial asset is required to demonstrate good behaviour to provide evidence that its credit risk has declined sufficiently. When contractual terms of a loan have been modified, evidence that the criteria for recognising lifetime ECL are no longer met includes history of up-to-date payment performance against the modified contractual terms.

The Bank 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 (Stage 1) to credit-impaired (Stage 3); and
- there is no unwarranted volatility in loss allowance from transfers between 12-month ECL (Stage 1) and lifetime ECL measurements (Stage 2).

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 borrower. 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(f)(ii).

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 originated loan is recognised and allocated to Stage 1 (assuming it is not credit-impaired at the recognition date).

The Bank renegotiates loans to customers in financial difficulties (referred to as 'forbearance activities') to maximise collection opportunities and minimise the risk of default. Under the Bank's forbearance policy, loan forbearance is granted on a selective basis if the debtor is currently in default on its debt or if there is a high risk of default, there is evidence that the debtor made all reasonable efforts to pay under the original contractual terms and the debtor is expected to be able to meet the revised terms.

The revised terms usually include extending the maturity, changing the timing of interest payments and amending the terms of loan covenants. Both retail and corporate loans are subject to the forbearance policy.

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Significant increase in credit risk, continued

Modified financial assets, continued

For financial assets modified as part of the Bank's forbearance policy, the estimate of PD reflects whether the modification has improved or restored the Bank's ability to collect interest and principal and the Bank's previous experience of similar forbearance action. As part of this process, the Bank evaluates the borrower's payment performance against the modified contractual terms and considers various behavioural indicators.

Forbearance is a qualitative indicator of a significant increase in credit risk and an expectation of forbearance may constitute evidence that an exposure is credit-impaired (see Note 3(k)). A customer needs to demonstrate consistently good payment behaviour over a period of time before the exposure is no longer considered to be credit-impaired/ in default or the PD is considered to have decreased such that the loss allowance reverts to being measured at an amount equal to 12-month ECL.

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); or
- the borrower is more than 90 days past due on any material credit obligation to the Bank;
- 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 covenant;
- quantitative – e.g. overdue status and non-payment on another obligation of the same borrower to the Bank; and
- based on data developed internally and obtained from external sources.

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

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 uses expert judgment in assessment of forward-looking information. This assessment is based on the information from external sources.

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 assessed relationships between macro-economic variables and credit risk and credit losses. The key driver is GDP forecasts.

Predicted relationships between the key indicator and default and loss rates on various portfolios of financial assets have been developed based on the analysis of historical data for the last five (5) years.

Measurement of expected credit losses (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.

The Bank generally estimates these parameters based on statistics models and other historical data. They are adjusted to reflect forward-looking information as described above.

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Significant increase in credit risk, continued

Measurement of expected credit losses (ECL), continued

PD estimates are estimates at a certain date, which are calculated separately for each loan portfolio, based on Roll Rate model (Markov chains) applied to the loan portfolios with similar credit risk characteristics. The probability of transition of loan portfolio segment from one 'past due' stage to stage 3 (default) is determined with the use of migration matrices based on historical data. Depth of historical data has to be a least 60 periods. Adjustment to average transition matrix will be made, with macroeconomic factors taken into account, by adding standard normal distribution of an average matrix of each segment and z-criterion of macroeconomic factor. A macroeconomic factor is GDP growth. Official statistics data (official websites of regulatory authority, statistics agencies of the Republic of Kazakhstan) are used as inputs for estimates with economic conditions taken into account. PDs are estimated considering the contractual maturities of exposures and estimated prepayment rates.

The Bank estimates LGD parameters based on the history of recovery rates of claims against defaulted counterparties. The LGD models consider the structure, collateral, seniority of the claim, counterparty industry and recovery costs of any collateral that is integral to the financial asset. LGD estimates are recalibrated for different economic scenarios and, for real estate lending, to reflect possible changes in property prices. They are calculated on a discounted cash flow basis using the effective interest rate as the discounting factor.

EAD represents the expected exposure in the event of a default. The Bank derives the EAD from the current exposure to the counterparty and potential changes to the current amount allowed under the contract and arising from amortisation. The EAD of a financial asset is its gross carrying amount at the time of default. For loan commitments, the EAD includes both the recovered amount and potential future amounts that may be drawn under the contract, which are estimated based on historical observations and forward-looking forecasts. For financial guarantees, the EAD represents the guarantee exposure when the financial guarantee becomes payable.

As described above, and subject to using a maximum of a 12-month PD for Stage 1 financial assets, the Bank measures ECL considering the risk of default over the maximum contractual period (including any borrower's extension options) over which it is exposed to credit risk, even if, for credit risk management purposes, the Bank considers a longer period.

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

- instrument type;
- credit assets segmentation;
- restructuring indicators.

The groupings are subject to regular review to ensure that exposures within a particular group remain appropriately homogeneous.

For portfolios in respect of which the Bank has limited historical data, external benchmark information is used to supplement the internally available data. The portfolios for which external benchmark information represents a significant input into measurement of ECL are as follows.

			External benchmarks used	
	Carrying amount at 31 December 2021	Carrying amount at 31 December 2020	PD	LGD
Cash and cash equivalents	260,602	278,742	Moody's default study	70%; 0% - if the Government of the Republic of Kazakhstan acts as a counterparty
Due from banks	6,570	63,426		
Investment securities	469,458	306,352	Moody's default study	LGD for investment securities, whose issuers are financial institutions is equal to 70%, for other companies LGD is based on the history of recovery rates depending on rating; 0% - if the Government of the Republic of Kazakhstan acts as a counterparty

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Credit quality analysis

The following table provides information on the credit quality of financial assets measured at amortised cost, investment securities measured at fair value through other comprehensive income as at 31 December 2021. 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, and POCI are included in Note 3(k).

	31 December 2021			
	Stage 1 12-month ECL	**Stage 2 Lifetime ECL - not credit-impaired**	**Stage 3 Lifetime ECL - credit-impaired**	**Total**
Cash and cash equivalents				
- rated from AA- to AA+	6,478	-	-	6,478
- rated from A- to A+	23,754	-	-	23,754
- rated from BBB- to BBB+	181,440	-	-	181,440
- rated from BB- to BB+	1,792	-	-	1,792
- rated from B- to B+	832	-	-	832
- not rated	60	-	-	60
	214,356	**-**	**-**	**214,356**
Loss allowance	(42)	-	-	(42)
Total cash and cash equivalents (less cash on hand)	**214,314**	**-**	**-**	**214,314**

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Credit quality analysis, continued

	31 December 2021			
	Stage 1 12-month ECL	Stage 2 Lifetime ECL - not credit-impaired	Stage 3 Lifetime ECL - credit-impaired	Total
Investment securities measured at amortised cost				
- rated from AAA- to AAA+	7,188	-	-	7,188
- rated from BBB- to BBB+	3,192	-	-	3,192
	10,380	-	-	**10,380**
Loss allowance	-	-	-	-
Total investment securities measured at amortised cost	**10,380**	-	-	**10,380**
Debt investment securities at FVOCI				
- rated from AAA- to AAA+	28,416	-	-	28,416
- rated from BBB- to BBB+	417,259	-	-	417,259
- rated from BB- to BB+	12,842	-	-	12,842
- rated from B- to B+	-	-	-	-
Total debt investment securities at fair value through other comprehensive income	**458,517**	-	-	**458,517**
Loss allowance	-	-	-	-
Total carrying amount of investment securities measured at fair value through other comprehensive income - debt	**458,517**	-	-	**458,517**
Due from banks				
- rated from AA- to AA+	6,292	-	-	6,292
- rated from BBB- to BBB+	216	-	-	216
- not rated	70	-	-	70
	6,578	-	-	**6,578**
Loss allowance	(8)	-	-	(8)
Total due from banks	**6,570**	-	-	**6,570**

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Credit quality analysis, continued

	31 December 2021				
	Stage 1 12-month ECL	Stage 2 Lifetime ECL – not credit-impaired	Stage 3 Lifetime ECL – credit-impaired	Originated credit-impaired financial assets (POCI-assets)	Total
Loans to customers at amortised cost – corporate customers					
Not overdue loans	378,921	68,094	33,156	14,139	494,310
Overdue loans:					
- overdue less than 30 days	13,091	3,225	16,153	-	32,469
- overdue 31-60 days	-	231	1,223	-	1,454
- overdue 61-90 days	-	23	50	-	73
- overdue 91-180 days	-	-	8,918	-	8,918
- overdue more than 180 days	-	-	30,657	-	30,657
	392,012	**71,573**	**90,157**	**14,139**	**567,881**
Loss allowance	(3,013)	(7,536)	(55,968)	-	(66,517)
Total loans to customers at amortised cost – corporate customers	**388,999**	**64,037**	**34,189**	**14,139**	**501,364**
Loans to customers at amortised cost – retail customers					
Not overdue loans	598,327	17,013	2,405	-	617,745
Overdue loans:					
- overdue less than 30 days	4,305	1,472	214	-	5,991
- overdue 31-60 days	-	2,019	91	-	2,110
- overdue 61-90 days	-	1,303	149	-	1,452
- overdue 91-180 days	-	-	2,444	-	2,444
- overdue more than 180 days	-	-	34,984	-	34,984
	602,632	**21,807**	**40,287**		**664,726**
Loss allowance	(3,692)	(563)	(19,515)	-	(23,770)
Total loans to customers at amortised cost – retail customers	**598,940**	**21,244**	**20,772**	**-**	**640,956**
Loans under reverse repurchase agreements					
Reverse repo agreements, not overdue	35,013	-	-	-	35,013
Loss allowance	-	-	-	-	-
Total loans under reverse repurchase agreements	**35,013**	-	-	-	**35,013**

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Credit quality analysis, continued

	31 December 2020			
	Stage 1 12-month ECL	Stage 2 Lifetime ECL - not credit-impaired	Stage 3 Lifetime ECL - credit-impaired	Total
Cash and cash equivalents				
- rated from AA- to AA+	14,589	-	-	14,589
- rated from A- to A+	14,131	-	-	14,131
- rated from BBB- to BBB+	188,835	-	-	188,835
- rated from BB- to BB+	2,212	-	-	2,212
- rated from B- to B+	1,922	-	-	1,922
- not rated	145	-	-	145
	221,834	-	-	**221,834**
Loss allowance	(68)	-	-	(68)
Total cash and cash equivalents (less cash on hand)	**221,766**	-	-	**221,766**
Investment securities measured at amortised cost				
- rated from AAA- to AAA+	7,097	-	-	7,097
- rated from BBB- to BBB+	3,160	-	-	3,160
	10,257	-	-	**10,257**
Loss allowance	-	-	-	-
Total investment securities measured at amortised cost	**10,257**	-	-	**10,257**
Debt investment securities at fair value through other comprehensive income				
- rated from AAA- to AAA+	13,480	-	-	13,480
- rated from BBB- to BBB+	265,190	-	-	265,190
- rated from BB- to BB+	10,727	-	-	10,727
- rated from B- to B+	6,400	-	-	6,400
Total debt investment securities at fair value through other comprehensive income	**295,797**	-	-	**295,797**
Loss allowance	(90)	-	-	(90)
Total carrying amount of investment securities measured at fair value through other comprehensive income - debt	**295,707**	-	-	**295,707**
Due from banks				
- rated from AA- to AA+	5,292	-	-	5,292
- rated from BBB- to BBB+	58,073	-	-	58,073
- not rated	69	-	-	69
	63,434	-	-	**63,434**
Loss allowance	(8)	-	-	(8)
Total due from banks	**63,426**	-	-	**63,426**

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Credit quality analysis, continued

	31 December 2020				
	Stage 1 12-month ECL	Stage 2 Lifetime ECL – not credit-impaired	Stage 3 Lifetime ECL – credit-impaired	Originated credit-impaired financial assets (POCI- assets)	Total
Loans to customers at amortised cost – corporate customers					
Not overdue loans	327,155	62,568	146,760	9,650	546,133
Overdue loans:					
- overdue less than 30 days	1,819	230	9,719	1,383	13,151
- overdue 31-60 days	-	1,254	2,110	-	3,364
- overdue 61-90 days	-	45	874	-	919
- overdue 91-180 days	-	-	6,273	-	6,273
- overdue more than 180 days	-	-	33,785	-	33,785
	328,974	**64,097**	**199,521**	**11,033**	**603,625**
Loss allowance	(1,212)	(5,792)	(81,900)	-	(88,904)
Total loans to customers at amortised cost – corporate customers	**327,762**	**58,305**	**117,621**	**11,033**	**514,721**
Loans to customers at amortised cost – retail customers					
Not overdue loans	429,444	25,027	4,939	-	459,410
Overdue loans:					
- overdue less than 30 days	5,730	2,514	872	-	9,116
- overdue 31-60 days	-	3,935	1,625	-	5,560
- overdue 61-90 days	-	1,471	1,003	-	2,474
- overdue 91-180 days	-	-	9,280	-	9,280
- overdue more than 180 days	-	-	36,719	-	36,719
	435,174	**32,947**	**54,438**	**-**	**522,559**
Loss allowance	(4,281)	(1,025)	(18,565)	-	(23,871)
Total loans to customers at amortised cost – retail customers	**430,893**	**31,922**	**35,873**	**-**	**498,688**
Loans under reverse repurchase agreements					
Reverse repurchase agreements, not overdue	38,853	-	-	-	38,853
Loss allowance	-	-	-	-	-
Total loans under reverse repurchase agreements	**38,853**	**-**	**-**	**-**	**38,853**

5. NET INTEREST INCOME

	The year ended 31 December 2021	The year ended 31 December 2020
Interest income calculated using the effective interest method:		
Interest income on financial assets measured at amortised cost:		
- interest income on assets not credit-impaired	98,434	94,995
- interest income on credit-impaired assets	5,265	10,895
Interest income on financial assets measured at fair value through other comprehensive income	30,877	16,253
Total interest income calculated using the effective interest method	**134,576**	**122,143**
Interest income on financial assets measured at amortised cost comprise:		
Interest on loans to customers and banks	96,506	101,630
Interest on investment securities measured at amortised cost	121	237
Penalties on loans to customers and banks	-	657
Interest on due from banks	7,072	3,366
	103,699	**105,890**
Total interest income	**134,576**	**122,143**
Interest expense:		
Interest expense on financial liabilities measured at amortised cost	(72,279)	(65,329)
Total interest expense	**(72,279)**	**(65,329)**
Interest expense on financial liabilities measured at amortised cost:		
Interest on customer accounts	(51,118)	(42,777)
Interest on debt securities issued	(10,552)	(11,364)
Interest on due to banks and financial institutions	(3,149)	(4,003)
Interest on subordinated bonds	(7,460)	(7,185)
Total interest expense on financial liabilities measured at amortised cost	**(72,279)**	**(65,329)**
	62,297	**56,814**

(in millions of KZT, unless otherwise stated)

6. CHARGE OF EXPECTED CREDIT LOSS ALLOWANCE FOR INTEREST-BEARING ASSETS

Years ended 31 December 2020 and 2021	Corporate loans	Small- and medium-sized enterprises	Mortgage loans	Consumer loans	Business development	Auto loans	Loans to banks	Total loans to customers and banks
1 January 2020	**76,188**	**8,334**	**8,427**	**10,029**	**6,679**	**97**	**10**	**109,764**
Charge/(recovery) of allowance*	20,077	9,731	3,981	7,203	2,845	29	(3)	43,863
New financial assets originated or purchased*	1,426	194	317	1,573	151	19	18	3,698
Effect of unwinding of discount**	3,921	554	50	5	203	-	-	4,733
Write-off of assets	(11,191)	(10,891)	(6,903)	(3,330)	(3,065)	(8)	-	(35,388)
Write-off of previously charged effect of unwinding of discount on a gross basis	(8,581)	(1,672)	(1,183)	(2,648)	(3,199)	(92)	-	(17,375)
Recovery of assets previously written-off	408	266	472	984	1,160	39	-	3,329
Foreign exchange difference	130	10	8	21	7	-	-	176
31 December 2020	**82,378**	**6,526**	**5,169**	**13,837**	**4,781**	**84**	**25**	**112,800**
1 January 2021								
Charge/(recovery) of allowance*	2,544	7,418	3,822	4,633	1,004	(45)	(25)	19,351
New financial assets originated or purchased*	3,499	172	47	1,557	286	857	-	6,418
Effect of unwinding of discount**	3,147	330	30	1,126	111	-	-	4,744
Write-off of assets	(33,760)	(6,642)	(4,557)	(9,139)	(1,036)	(4)	-	(55,138)
Recovery of assets previously written-off	180	373	663	159	228	44	-	1,647
Foreign exchange difference	313	39	25	58	26	4	-	465
31 December 2021	**58,301**	**8,216**	**5,199**	**12,231**	**5,400**	**940**	**-**	**90,287**

*Provisions recognised during the twelve months ended 31 December 2021 and 2020 are presented in the separate statement of profit and loss in 'Charge of credit loss allowance on loans to customers and banks' line item.

**Unwinding of discount on present value of expected credit losses.

(in millions of KZT, unless otherwise stated)

7. FEE AND COMISSION INCOME/(EXPENSE)

	For the year ended 31 December 2021	For the year ended 31 December 2020
Payment cards	11,273	8,649
Settlement	5,963	6,665
Issued guarantees	4,277	4,350
Cash operations	3,293	3,481
Sale of insurance policies	993	-
Custody activities	336	161
Documentary operations	193	52
Trust operations	193	209
Internet banking services	49	63
Other	482	578
Total fee and commission income	**27,052**	**24,208**
Payment cards	(9,438)	(7,751)
Settlement	(961)	(588)
Documentary operations	(119)	(15)
Custody activities	(139)	(120)
Other	(522)	(691)
Total fee and commission expense	**(11,179)**	**(9,165)**
	15,873	**15,043**

Fee and commission income that are not integral to the effective interest rate on a financial asset or financial liability, is recognised depending on the type of the service either at the point in time or as the Bank satisfies its performance obligation under the contract:

- fees and commission for settlement operations, cash operations, payment card operations, Internet-banking services, foreign exchange operations is charged for the execution of payment order in accordance with tariffs depending on the type of the transaction and recognised as income at the time when transaction is performed;
- a commission fee on guarantees and letters of credit issued is paid in advance and is recognised as income over the life time of the relevant guarantee or letter of credit.

Contract balances

The following table provides information about receivables and contract liabilities from contracts with customers.

KZT million	For the year ended 31 December 2021	For the year ended 31 December 2020
Fee and commission receivables, which are included in 'other assets' (Note 18)	5,304	6,647

8 NET GAIN/(LOSS) ON FINANCIAL ASSETS AND LIABILITIES AT FAIR VALUE THROUGH PROFIT OR LOSS

	The year ended 31 December 2021	The year ended 31 December 2020
Realised gain on trading operations	-	(56)
Unrealised loss on derivative financial instruments	5	(6)
Realised (loss)/gain on derivative financial instruments	2,635	(163)
	2,640	**(225)**

9. NET FOREIGN EXCHANGE GAIN

	Fr the year ended 31 December 2021	For the year ended 31 December 2020
Dealing operations, net	6,636	8,430
Foreign currency differences, net	2,597	1,392
	9,233	**9,822**

(in millions of KZT, unless otherwise stated)

10. OPERATING EXPENSES

	For the year ended 31 December 2021	For the year ended 31 December 2020
Wages and salaries	21,135	17,662
Lease expenses	4,075	3,417
Taxes other than income tax	4,063	3,696
Depreciation and amortisation	3,352	3,171
Administrative expenses	2,974	2,790
Contributions to Deposit Insurance Fund	2,904	2,661
Telecommunications	1,471	1,080
Security and alarming expenses	955	946
Advertising costs	682	557
Equipment repair and maintenance	659	356
Collection expenses	594	540
Professional services	332	569
Business travel expenses	232	128
Representation expenses	87	23
Other expenses	852	799
	44,367	**38,395**

11. INCOME TAX EXPENSE

	For the year ended 31 December 2021	For the year ended 31 December 2020
Current year tax expense	-	-
Movement in deferred tax liabilities due to origination and reversal of temporary differences and movement in loss allowance	387	1,647
Total income tax expense	**387**	**1,647**

In 2021, the applicable tax rate for current and deferred tax is 20% (2020: 20%)

Reconciliation of effective tax rate for the year ended 31 December

	31 December 2021	%	31 December 2020	%
Profit before income tax	**19,287**		**10,215**	
Income tax at the applicable tax rate	3,857	20.00	2,043	20.00
Non-taxable interest and other income on transactions with state and other qualified securities	(4,883)	(25.32)	(1,079)	(10.56)
Non-deductible operating and other expenses	1,413	7.33	683	6.69
	387	**2.01**	**1,647**	**16.13**

(in millions of KZT, unless otherwise stated)

11. INCOME TAX EXPENSE, CONTINUED

(a) Deferred tax assets and deferred tax 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 deferred tax liabilities as at 31 December 2021 and 31 December 2020.

Movements in temporary differences during 2021 and 2020 are presented as follows.

2021	nce at 1 January 2021	Recognised in profit or loss	Recognised in equity	Balance at 31 December 2021
Accrued interest payable	27	(11)	-	16
Investment securities measured at fair value through other comprehensive income	(204)	-	377	173
Tax loss carry-forward	1,123	-	-	1,123
Other	282	71	-	353
The effect of modification of financial assets	157	25	-	182
Discount on loans to customers	94	(42)	-	52
Discount on low-interest customer accounts	(1,619)	(872)	-	(2,491)
Discount on subordinated bonds	(7,155)	250	-	(6,905)
Property, equipment and intangible assets	(3,609)	192	327	(3,090)
	(10,904)	**(387)**	**704**	**(10,587)**

2020	Balance at 1 January 2020	Recognised in profit or loss	Recognised in equity	Balance at 31 December 2020
Accrued interest payable	66	(39)	-	27
Investment securities measured at fair value through other comprehensive income	(38)	-	(166)	(204)
Tax loss carry-forward	1,123	-	-	1,123
Other	279	3	-	282
The effect of modification of financial assets	257	(100)	-	157
Discount on loans to customers	493	(399)	-	94
Discount on low-interest customer accounts	(861)	(758)	-	(1,619)
Discount on subordinated bonds	(7,375)	220	-	(7,155)
Property, equipment and intangible assets	(2,925)	(574)	(110)	(3,609)
	(8,981)	**(1,647)**	**(276)**	**(10,904)**

(in millions of KZT, unless otherwise stated)

12. CASH AND CASH EQUIVALENTS

	31 December 2021	31 December 2020
Cash on hand	**46,288**	**56,976**
Nostro accounts with the NBRK	**102,884**	**67,855**
Nostro accounts with other banks		
- rated from AA- to AA+	6,478	14,589
- rated from A- to A+	23,754	14,131
- rated from BBB- to BBB+	3,495	5,662
- rated from BB- to BB+	1,792	2,212
- rated from B- to B+	832	15
- not rated	60	145
Total gross nostro accounts with other banks	**36,411**	**36,754**
Loss allowance	(42)	(25)
Total nostro accounts with other banks	**36,369**	**36,729**
Term deposits with the NBRK	**75,061**	**115,318**
Term deposits with other banks		
- rated from B- to B+	-	1,907
Total gross current accounts and term deposits with other banks	-	**1,907**
Loss allowance	-	(43)
Total current accounts and term deposits with other banks	-	**1,864**
Total cash and cash equivalents	**260,602**	**278,742**

The credit ratings are presented by reference to the credit ratings of Standard & Poor's rating agency or analogues of similar international rating agencies.

All cash and cash equivalents are allocated to Stage 1 of the credit risk grade.

As at 31 December 2021, the Bank has accounts with one (1) bank (31 December 2020: two (2) banks), whose balances exceed 10% of equity. The gross value of these balances as at 31 December 2021 is KZT 177,945 million (31 December 2020: KZT 197,414 million).

Minimum reserve requirements

As at 31 December 2021 and 2020, minimum reserve requirements are calculated in accordance with regulations issued by the NBRK. To meet the minimum reserves requirements the Bank places cash in reserve assets, which are required to be maintained at the level of not less than the average amount of cash on hand denominated in national currency and balance on the current account with the NBRK in the national currency for 4 weeks, calculated as certain minimum level of deposits and current accounts of the customers that are residents and non-residents of the Republic of Kazakhstan, and of other liabilities of the Bank. As at 31 December 2021, the minimum reserve requirement is KZT 20,214 million (31 December 2020: minimum reserve requirement was KZT 17,661 million) and reserve asset was KZT 33,888 million (31 December 2020: KZT 39,381 million).

13. INVESTMENT SECURITIES

	31 December 2021	31 December 2020
Investment securities measured at fair value through other comprehensive income	459,078	296,095
Investment financial assets at amortised cost	10,380	10,257
Total investment securities	**469,458**	**306,352**

(in millions of KZT, unless otherwise stated)

13. INVESTMENT SECURITIES, CONTINUED

Investment securities measured at fair value through other comprehensive income

	Nominal interest rate, %	31 December 2021	Nominal interest rate, %	31 December 2020
Debt securities				
Government bonds of the Republic of Kazakhstan	5.0-11.0	180,852	0.6-11.0	104,976
Corporate bonds	2.11-11.5	118,832	2.12-11.0	52,595
The NBRK discount notes		134,155		120,495
Equity securities				
Shares of Kazakhstani companies		537		272
Shares of international companies		24		26
Pledged under bank loans				
Government bonds of the Republic of Kazakhstan		-	5.13	2,540
Corporate bonds	2.5	24,678	4.38-6.95	15,191
		459,078		**296,095**

All investment securities are categorised into Stage 1 of credit risk grading.

Investment securities measured at amortised cost

	Nominal interest rate, %	31 December 2021	Nominal interest rate, %	31 December 2020
Debt securities				
Government bonds of the Republic of Kazakhstan	3.88-5.00	3,192	3.87	3,160
Corporate bonds	2.12-11.00	730	2.12	12
		3,922		**3,172**
Pledged under bank loans				
Corporate bonds	2.12	6,458	2.12	7,085
		6,458		**7,085**
Allowance for expected credit losses		-		-
		10,380		**10,257**

14. DUE FROM BANKS

	31 December 2021	31 December 2020
Term deposits		
- contingent deposit with the NBRK	216	58,073
- rated from AA- to AA+	6,292	5,292
- not rated	70	69
Total gross term deposits	**6,578**	**63,434**
Allowance for expected credit losses	(8)	(8)
Total term deposits	**6,570**	**63,426**

The credit ratings are presented by reference to the credit ratings of Standard & Poor's rating agency or analogues of similar international rating agencies. As at 31 December 2021 and 2020, all due from banks are categorised into Stage 1 of credit risk grading.

As at 31 December 2021, the contingent deposit with the NBRK consists of KZT 157 million (31 December 2020: KZT 2,888 million) received from Development Bank of Kazakhstan JSC (the "DBK JSC") and KZT 59 million (31 December 2020: KZT 4,375 million) received from DAMU Entrepreneurship Development Fund JSC (the "EDF DAMU JSC") in accordance with the loan agreements with DBK JSC and EDF DAMU JSC. As at 31 December 2021, funds of KZT 50,810 million received during 2020 from Kazakhstan Sustainability Fund JSC (the "KSF JSC") under the preferential lending programme, which aims at providing support to small- and medium-size enterprises, were fully utilised by the Bank.

Concentration of placements with banks

As at 31 December 2021, the Bank has no banks (2020: one bank) whose balances exceed 10% of equity. The gross value of these balances as at 31 December 2020 is KZT 58,073 million.

(in millions of KZT, unless otherwise stated)

15. INVESTMENT IN SUBSIDIARIES

The Bank is the parent company of the banking group, which consists of the following subsidiaries that are not consolidated for the purpose of these separate financial statements:

Subsidiary	**Country of operation**	**Type of activity**
BCC-SAOO LLP	The Republic of Kazakhstan	Distressed asset management
BCC Invest JSC	The Republic of Kazakhstan	Brokerage and dealer activity
Center Leasing LLP	The Republic of Kazakhstan	Finance lease and other activity

	31 December 2021		**31 December 2020**	
	Ownership interest, %	**Amount**	**Ownership interest, %**	**Amount**
BCC-SAOO LLP	100.00	13,313	100.00	13,313
BCC Invest JSC	100.00	20,174	100.00	20,174
Center Leasing LLP	100.00	18,820	100.00	5,651
		52,307		**39,138**
Less impairment allowance		-		-
Total investments in subsidiaries		**52,307**		**39,138**

In December 2011, Kazakhstan adopted the Law of the Republic of Kazakhstan 'On the Introduction of Amendments and Additions to Certain Legislative Acts of the Republic of Kazakhstan regarding the Regulation of Banking Activities and Financial Institutions with Respect to Risk Mitigation', which stipulated that commercial banks could establish special subsidiaries to purchase banks' non-performing (distressed) assets and manage them. On 21 August 2013, the Bank's special subsidiary BCC-SAOO LLP intended for the management of distressed assets was registered with the Ministry of Justice of the Republic of Kazakhstan.

In May 1998, BCC Invest JSC was established as a limited liability partnership (former KIB ASSET MANAGEMENT LLP) in accordance with legislation of the Republic of Kazakhstan. On 26 September 2006, KIB ASSET MANAGEMENT LLP was re-registered as a joint stock company. The main activity of BCC Invest JSC is management of assets held by mutual funds and management of investment portfolios. During 2020, the Bank increased capitalisation of BCC Invest JSC to expand the subsidiary's operations and improve business synergy of the banking group.

In September 2002, Center Leasing LLP was established as a limited liability partnership in accordance with the legislation of the Republic of Kazakhstan. The principal activity of Center Leasing LLP is leasing operations, which are carried out in accordance with Article 10 of the Law of the Republic of Kazakhstan "On Financial Leasing". In accordance with the decision of the Board of Directors of the Bank as of March 2020, the Bank's interest in the charter capital of Center Leasing LLP was increased to become 100%, through the purchase of the interests held by individuals, who had been the participants of the company before it was acquired. During 2021, the Bank transferred to the Company's charter capital an investment property of KZT 9,169 million and cash of KZT 4,000 million. During 2020, the Bank transferred to the Company's charter capital an investment property of KZT 3,126 million.

16. LOANS TO CUSTOMERS AND BANKS

	31 December 2021	**31 December 2020**
Loans to customers	1,200,793	1,082,804
Accrued interest	31,814	43,380
	1,232,607	**1,126,184**
Less loss allowance	(90,287)	(112,775)
Total loans to customers	**1,142,320**	**1,013,409**
Loans to banks	-	775
Accrued interest	-	2
Less loss allowance	-	(25)
Total loans to banks	-	**752**
Loans under reverse repurchase agreements	**35,013**	**38,853**
Total loans to customers and banks	**1,177,333**	**1,053,014**

Movement in credit loss allowance for loans to customers and banks for the twelve months ended 31 December 2021 and 31 December 2020 is disclosed in Note 6.

(in millions of KZT, unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

The following table provides information by types of loan products as at 31 December 2021:

	Gross amount	Loss allowance	Carrying amount
Loans to corporate customers			
Corporate loans	439,827	(58,301)	381,526
Small- and medium-sized enterprises	128,054	(8,216)	119,838
Loans to retail customers			
Mortgage loans (including mortgage loans under the '7-20-25' programme and the Baspana Hit programme)	410,596	(5,199)	405,397
Consumer loans	123,912	(12,231)	111,681
Business development	86,559	(5,400)	81,159
Auto loans	43,659	(940)	42,719
	1,232,607	**(90,287)**	**1,142,320**

The following table provides information by types of loan products as at 31 December 2020:

	Gross amount	Loss allowance	Carrying amount
Loans to corporate customers			
Corporate loans	465,612	(82,378)	383,234
Small- and medium-sized enterprises	138,013	(6,526)	131,487
Loans to retail customers			
Mortgage loans (including mortgage loans under the '7-20-25' programme and the Baspana Hit programme)	305,754	(5,169)	300,585
Consumer loans	126,723	(13,837)	112,886
Business development	75,023	(4,781)	70,242
Auto loans	15,059	(84)	14,975
	1,126,184	**(112,775)**	**1,013,409**

(in millions of Kazakhstani tenge unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(a) Credit quality of corporate loans, loans to small and medium-sized enterprises and loans to retail customers

Analysis by credit quality of loans to customers outstanding as at 31 December 2021 was as follows:

	Corporate loans	Small- and medium-sized enterprises	Mortgage loans	Consumer loans	Business development development	Auto loans	Total
Loans to customers							
Not overdue	383,493	110,815	397,926	102,903	73,595	43,321	1,112,053
Overdue loans							
- overdue less than 30 days	31,836	633	2,009	2,659	1,168	155	38,460
- overdue 31-60 days	-	1,456	550	1,003	520	38	3,567
- overdue 61-90 days	-	73	436	738	274	3	1,524
- overdue 91-180 days	7,161	1,757	504	1,390	534	16	11,362
- overdue more than 180 days	17,337	13,320	9,171	15,219	10,468	126	65,641
Total loans to customers, net of allowance for expected credit losses	**439,827**	**128,054**	**410,596**	**123,912**	**86,559**	**43,659**	**1,232,607**
Allowance for expected credit losses	(58,301)	(8,216)	(5,199)	(12,231)	(5,400)	(940)	(90,287)
Total loans to customers, net of allowance for expected credit losses	**381,526**	**119,838**	**405,397**	**111,681**	**81,159**	**42,719**	**1,142,320**

(in millions of Kazakhstani tenge unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(a) Credit quality of corporate loans, loans to small and medium-sized enterprises and loans to retail customers, continued

The following table provides information on the credit quality of loans to customers as at 31 December 2020:

	Corporate loans	Small- and medium-sized enterprises	Mortgage loans	Consumer loans	Business development development	Auto loans	Total
Loans to customers							
Not overdue	425,362	120,771	287,834	97,531	59,205	14,840	1,005,543
Overdue loans							
- overdue less than 30 days	11,189	1,962	3,097	4,196	1,792	31	22,267
- overdue 31-60 days	2,042	1,322	1,757	2,474	1,315	14	8,924
- overdue 61-90 days	110	809	946	1,399	126	3	3,393
- overdue 91-180 days	5,256	1,017	3,470	4,488	1,322	-	15,553
- overdue more than 180 days	21,653	12,132	8,650	16,635	11,263	171	70,504
Total loans to customers, net of allowance for expected credit losses	**465,612**	**138,013**	**305,754**	**126,723**	**75,023**	**15,059**	**1,126,184**
Allowance for expected credit losses	(82,378)	(6,526)	(5,169)	(13,837)	(4,781)	(84)	(112,775)
Total loans to customers, net of allowance for expected credit losses	**383,234**	**131,487**	**300,585**	**112,886**	**70,242**	**14,975**	**1,013,409**

(b) Analysis of movement in allowance for expected credit losses

As at 31 December 2021, in determining the credit loss allowance for loans to corporate customers classified into Stage 3 of credit risk grading, management makes the following key assumptions:

— estimate by management of expected operating cash flows for a number of borrowers, whose operating activities have not ceased;

— estimate by management of a value of collateral as at the date of sale and timing of anticipated receipts: a delay of 36 - 60 months in obtaining proceeds from the foreclosure of collateral;

— for some borrowers recorded in Stage 3 the potential investors and partners are expected to be attracted to increase the operating cash flows sufficient to repay a debt to the Bank.

Loans recorded in Stage 3 were included in the Action Plan based on results of AQR, which comprises measures aimed at rehabilitation of the borrowers, repayment at the expense of sale of collateral and foreclosure under the court decision. In accordance with the Plan, the Bank expects that the debt according to the agreed list of borrowers will be repaid during the five years. Under this Plan, the Bank provides to the regulator the Plan progress reports on a quarterly basis.

(in millions of Kazakhstani tenge unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(b) Analysis of movement in allowance for expected credit losses, continued

	Twelve months ended 31 December 2021			
	Stage 1 12-month expected credit losses	Stage 2 Lifetime ECL for assets not credit-impaired	Stage 3 Life-time ECL for credit-impaired assets	Total
Loans to corporate customer and small- and medium-sized enterprises				
Allowance for ECL as at the beginning of the period	**1,212**	**5,792**	**81,900**	**88,904**
Transition to lifetime expected credit losses for assets not credit-impaired	(1)	2,694	(2,693)	-
Transition to lifetime expected credit losses for credit-impaired assets	-	(1,700)	1,700	-
Charge/(recovery) of allowance	490	228	9,244	9,962
New financial assets originated or purchased	1,298	482	1,891	3,671
Unwinding of discount	-	-	3,477	3,477
Write-off of assets	-	-	(40,402)	(40,402)
Recovery of assets previously written off	-	-	553	553
Foreign exchange difference	14	40	298	352
Allowance for expected credit losses at the end of the year	**3,013**	**7,536**	**55,968**	**66,517**

	Twelve months ended 31 December 2021			
	Stage 1 12-month expected credit losses	Stage 2 Lifetime ECL for assets not credit-impaired	Stage 3 Life-time ECL for credit-impaired assets	Total
Loans to individuals				
Allowance for ECL as at the beginning of the period	**4,281**	**1,025**	**18,565**	**23,871**
Transition to 12-month ECL	30	(17)	(13)	-
Transition to lifetime expected credit losses for assets not credit-impaired	30.	374	(344)	-
Transition to lifetime expected credit losses for credit-impaired assets	-	(357)	357	-
Charge/(recovery) of allowance	(3,023)	(511)	12,948	9,414
New financial assets originated or purchased	2,417	46	284	2,747
Unwinding of discount	-	-	1,267	1,267
Write-off of assets	-	-	(14,736)	(14,736)
Recovery of assets previously written off	-	-	1,094	1,094
Foreign exchange difference	17	3	93	113
Allowance for expected credit losses at the end of the year	**3,692**	**563**	**19,515**	**23,770**

	Twelve months ended 31 December 2020			
	Stage 1 12-month expected credit losses	Stage 2 Lifetime ECL for assets not credit-impaired	Stage 3 Life-time ECL for credit-impaired assets	Total
Loans to corporate customer and small- and medium-sized enterprises				
Allowance for ECL as at the beginning of the period	**1,084**	**2,667**	**80,771**	**84,522**
Transition to lifetime expected credit losses for assets not credit-impaired	(46)	76	(30)	-
Transition to lifetime expected credit losses for credit-impaired assets	(113)	(738)	851	-
Charge/(recovery) of allowance	(1,250)	3,732	27,326	29,808
New financial assets originated or purchased	1,535	53	32	1,620
Unwinding of discount	-	-	4,475	4,475
Write-off of assets	-	-	(22,082)	(22,082)
Writing off of previously charged effect of unwinding of discount on gross basis	-	-	(10,253)	(10,253)
Recovery of assets previously written off	-	-	674	674
Foreign exchange difference	2	2	136	140
Allowance for expected credit losses at the end of the year	**1,212**	**5,792**	**81,900**	**88,904**

(in millions of Kazakhstani tenge unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(b) Analysis of movement in allowance for expected credit losses, continued

	Twelve months ended 31 December 2020			
	Stage 1 12-month expected credit losses	**Stage 2 Lifetime ECL for assets not credit-impaired**	**Stage 3 Life-time ECL for credit-impaired assets**	**Total**
Loans to individuals				
Allowance for ECL as at the beginning of the period	**1,961**	**1,286**	**21,985**	**25,232**
Transition to 12-month ECL	16	(14)	(2)	-
Transition to lifetime expected credit losses for assets not credit-impaired	(45)	59	(14)	-
Transition to lifetime expected credit losses for credit-impaired assets	(165)	(330)	495	-
Charge/(recovery) of allowance	1,239	(89)	12,908	14,058
New financial assets originated or purchased	1,269	111	680	2,060
Unwinding of discount	-	-	258	258
Write-off of assets	-	-	(13,306)	(13,306)
Writing off of previously charged effect of unwinding of discount on gross basis	-	-	(7,122)	(7,122)
Recovery of assets previously written off	-	-	2,655	2,655
Foreign exchange difference	6	2	28	36
Allowance for expected credit losses at the end of the year	**4,281**	**1,025**	**18,565**	**23,871**

(c) Analysis of movements in the gross carrying amounts

The note further explains how significant movements in the gross carrying amounts of loans to customers have contributed to changes in allowances for expected credit losses:

Loans to corporate customer and small- and medium-sized enterprises

- A volume of loans issued to customers during 12 months of 2021 caused increase in gross carrying amount of the portfolio of loans to corporate customers and small and medium-sized enterprises by KZT 157,560 million, while respective increase in 12-month loss allowance amounted to KZT 3,671 million.
- A volume of loans repaid during 12 months of 2021 caused decrease in gross carrying amount of the portfolio of loans to corporate customers and small and medium-sized enterprises by KZT 152,902 million, while respective decrease in 12-month loss allowance amounted to KZT 965 million.
- Write-off of loans with gross carrying amount of KZT 40,402 million resulted in decrease in loss allowance categorised into Stage 3 by the same amount.

Loans to individuals

- A volume of loans to customers during 12 months of 2021 caused increase in gross carrying amount of the portfolio of retail loans by KZT 219,084 million, while respective increase in 12-month loss allowance measured on 12-month basis amounted to KZT 2,747 million.
- A volume of loans repaid during the year caused decrease in gross carrying amount of the portfolio of loans to corporate customers and small and medium-sized enterprises by KZT 62,181 million, while respective decrease in 12-month loss allowance amounted to KZT 1,180 million.
- Write-off of loans with gross carrying amount of KZT 14,736 million resulted in decrease in loss allowance categorised into Stage 3 by the same amount.

(d) Analysis of collateral and other credit enhancements

(i) Loans to corporate customers

Loans to corporate customers are secured by various types of collateral depending on the type of transactions. The general creditworthiness of a corporate customer and small and medium-sized 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 and small and medium-sized customers to provide it.

The following table provides information on collateral and other credit enhancements securing loans to corporate customers and small and medium-sized enterprises (net of loss allowance) by types of collateral:

(in millions of Kazakhstani tenge unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(d) Analysis of collateral and other credit enhancements, continued

(i) Loans to corporate customers, continued

31 December 2021	Carrying amount of loans to customers	Fair value of collateral - for collateral assessed as of reporting date	Fair value of collateral - for collateral assessed as of loan inception date	Fair value of collateral not determined
Loans to corporate customers				
Cash and deposits	1,589	1,589	-	-
Real estate	243,564	243,564	-	-
Vehicles	492	492	-	-
Equipment	41,850	41,850	-	-
Corporate guarantees	58,940	-	-	58,940
Income from future contracts	16,751	-	-	16,751
Goods in turnover	619	-	-	619
Mineral rights	14,221	14,221	-	-
Other collateral	1,790	-	1,790	-
No collateral or other credit enhancement	1,709	-	-	1,709
Total loans to corporate customers	**381,525**	**301,716**	**1,790**	**78,019**

31 December 2021	Carrying amount of loans to customers	Fair value of collateral - for collateral assessed as of reporting date	Fair value of collateral - for collateral assessed as of loan inception date	Fair value of collateral not determined
Loans to small- and medium-sized enterprises				
Cash and deposits	8,542	8,542	-	-
Real estate	97,081	97,081	-	-
Vehicles	314	314	-	-
Equipment	2,332	2,332	-	-
Corporate guarantees	6,406	-	-	6,406
Goods in turnover	382	-	-	382
Other collateral	321	-	321	-
Contractual cash flows	296	-	-	296
No collateral or other credit enhancement	4,165	-	-	4,165
Total loans to small- and medium-sized enterprises	**119,839**	**108,269**	**321**	**11,249**
Total loans to corporate customers	**501,364**	**409,985**	**2,111**	**89,268**

31 December 2020	Carrying amount of loans to customers	Fair value of collateral - for collateral assessed as of reporting date	Fair value of collateral - for collateral assessed as of loan inception date	Fair value of collateral not determined
Loans to corporate customers				
Cash and deposits	1,228	1,228	-	-
Real estate	256,038	256,038	-	-
Vehicles	628	628	-	-
Equipment	14,502	14,502	-	-
Corporate guarantees	51,725	-	-	51,725
Income from future contracts	15,714	-	-	15,714
Goods in turnover	3,545	-	-	3,545
Mineral rights	20,343	20,343	-	-
Other collateral	4,434	-	4,434	-
No collateral or other credit enhancement	15,077	-	-	15,077
Total loans to corporate customers	**383,234**	**292,739**	**4,434**	**86,061**
Loans to small- and medium-sized enterprises				
Cash and deposits	6,372	6,372	-	-
Real estate	99,621	99,621	-	-
Vehicles	540	540	-	-
Equipment	12,988	12,988	-	-
Corporate guarantees	7,394	-	-	7,394
Goods in turnover	123	-	-	123
Other collateral	479	173	147	159
No collateral or other credit enhancement	3,970	-	-	3,970
Total loans to small- and medium-sized enterprises	**131,487**	**119,694**	**147**	**11,646**
Total loans to corporate customers	**514,721**	**412,433**	**4,581**	**97,707**

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(d) Analysis of collateral and other credit enhancements, continued

(i) Loans to corporate customers, continued

The tables above exclude overcollateralisation. In accordance with the recommendations of NBRK, collateral in the form of income from future contract is not sufficient and cannot be used in calculation of allowances. As at 31 December 2021 the loans to corporate customers with net carrying amount of KZT 16,751 million (31 December 2020: KZT 15,714 million) are secured by income from future contracts.

Amount recorded in the item "No collateral or other credit enhancement" comprises unsecured loans and parts of loans, which are not fully secured.

For majority of loans the fair value of collateral was assessed at the reporting day. The Bank also has loans, for which the fair value of collateral was assessed at the loan inception date and it was not updated for further changes, and loans for which the fair value of collateral is not determined and cannot be determined. Information on the valuation of collateral is based on when this estimate was made, if any.

For loans secured by multiple types of collateral, collateral that is most relevant for credit losses assessment is disclosed. Sureties received from individuals, such as shareholders of the company's borrowers, are not considered for credit losses assessment purposes.

Credit impaired loans to corporate customers

As at 31 December 2021, the net carrying amount of credit-impaired loans to corporate customers amounts to KZT 69,100 million (2020: KZT 164,527 million), while the value of collateral (mostly commercial real estate) securing these loans is KZT 69,100 million (2020: KZT 164,527 million), excluding overcollateralisation. Value of collateral securing each loan is limited by the loan carrying amount.

During 2021, there were no changes in the Bank's collateral policies.

(ii) Loans to retail customers

Mortgage loans are secured by the underlying housing real estate. Business development loans are secured by real estate. Auto loans are secured by the underlying cars. Consumer loans are usually secured by underlying property and in some cases by assets, including real estate, cash and motor vehicles.

Mortgage loans

Included in mortgage loans are loans with a net carrying amount of KZT 1,884 million (31 December 2020: KZT 5,363 million), which are secured by collateral with a fair value of less than the net carrying amount of the individual loans. The fair value of collateral for these loans amounts to KZT 899 million (31 December 2020: KZT 3,011 million).

Management believes that the fair value of collateral for mortgage loans with a net carrying amount of KZT 403,513 million (31 December 2020: KZT 295,222 million) is at least equal to the carrying amount of individual loans at the reporting date.

Auto loans

Included in auto loans are loans with a net carrying amount of KZT 49 million (31 December 2020: KZT 258 million), which are secured by collateral with a fair value of less than the net carrying amount of the individual loans. The fair value of collateral for these loans amounts to KZT 7 million (31 December 2020: KZT 13 million).

Management believes that the fair value of collateral for auto loans with a net carrying amount of KZT 42,670 million (31 December 2020: KZT 14,717 million) is at least equal to the carrying amount of individual loans at the reporting date.

Consumer loans

Included in consumer loans are loans with a net carrying amount of KZT 58,639 million (31 December 2020: KZT 58,231 million), which are secured by collateral with a fair value of less than the net carrying amount of the individual loans. The fair value of collateral for these loans amounts to KZT 696 million (31 December 2020: KZT 2,152 million).

Management believes that the fair value of collateral for consumer loans with a net carrying amount of KZT 53,042 million (31 December 2020: KZT 54,655 million) is at least equal to the carrying amount of individual loans at the reporting date.

Business development

Included in the business development portfolio are loans with a net carrying amount of KZT 18,572 million (31 December 2020: KZT 7,494 million), which are secured by collateral with a fair value of less than the net carrying amount of the individual loans. The fair value of collateral for these loans amounts to KZT 4,214 million (31 December 2020: KZT 2,214 million).

(in millions of Kazakhstani tenge unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(d) Analysis of collateral and other credit enhancements, continued

(ii) Loans to retail customers

Management believes that the fair value of collateral of business development loans with a net carrying amount of KZT 62,587 million (31 December 2020: KZT 62,748 million) is at least equal to the carrying amount of individual loans at the reporting date.

Credit impaired loans to retail customers

The following table stratifies credit exposures from credit-impaired loans to retail customers by ranges of loan-to-value (LTV) ratio. LTV is calculated as the ratio of the gross carrying amount of the loan to the value of the collateral. The valuation of the collateral excludes any adjustments for obtaining and selling the collateral. For credit-impaired loans the value of collateral is based on the most recent appraisals.

	2021	2020
Credit-impaired loans		
Loan-to-value ratio (LTV ratio)		
Less than 50%	8,361	15,599
51-70%	1,787	4,431
70%-150%	3,711	7,738
More than 150%	6,911	8,156
Total	**20,770**	**35,924**

Repossessed collateral

During 2021, the Bank obtained certain assets by taking possession of collateral for loans to customers with a net carrying amount of KZT 5,919 million (2020: KZT 20,060 million). As at 31 December 2021, the repossessed collateral was KZT 28,007 million (31 December 2020: KZT 32,720 million of repossessed collateral) (Note 18).

(e) Loan portfolio analysis

As at 31 December 2021, the Bank has 11 borrowers or groups of connected borrowers (31 December 2020: 12), whose loan balances exceed 10% of equity. The gross value of these balances as at 31 December 2021 is KZT 309,736 million (31 December 2020: KZT 342,646 million).

Industry and geographical analysis of the loan portfolio

Loans to customers were issued primarily to customers located within the Republic of Kazakhstan that operate in the following economic sectors:

	31 December 2021	31 December 2020
Individuals	664,726	522,560
Trade	78,270	84,223
Financial services	73,773	91,558
Rent of real estate	65,423	83,375
Transportation and equipment maintenance services	59,195	57,084
Transport and communication	55,939	21,857
Oil and gas industry	51,564	45,601
Housing construction	24,409	34,120
Manufacturing	20,755	18,348
Power engineering	20,749	43,063
Industrial construction	17,783	17,938
Agriculture	17,046	15,560
Food processing	14,231	19,499
Other	68,744	71,398
Total	**1,232,607**	**1,126,184**
Allowance for expected credit losses	(90,287)	(112,775)
	1,142,320	**1,013,409**

Fair value of assets received as collateral and carrying amount of reverse repurchase agreements as at 31 December 2021 and 2020 is as follows:

	31 December 2021		31 December 2020	
	Carrying amount of loans	Fair value of collateral	Carrying amount of loans	Fair value of collateral
Government bonds of the Republic of Kazakhstan	35,013	34,370	38,853	40,130
	35,013	**34,370**	**38,853**	**40,130**

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(f) Loan maturities

The maturity of the loan portfolio is presented in Note 26, which shows the remaining period from the reporting date to the contractual maturity of the loans. Due to the short-term nature of the loans issued by the Bank, it is likely that part of the loans will be extended at maturity. Accordingly, the effective maturity of the loan portfolio may be significantly longer than the contractually agreed term.

(g) Continuing involvement in asset

To realise the first initiative "New Opportunities for Each Family to Procure Housing", announced in the Address to the People by the President of the Republic of Kazakhstan "Five Social Initiatives of the President", the Programme "7-20-25. New Opportunities for Each Family to Procure Housing" (the "Programme") was approved by the Resolution of the NBRK dated 31 May 2018. "New Opportunities for Each Family to Procure Housing" (the "Program"). The operator of the Programme is Kazakhstan Sustainability Fund JSC (the "Operator").

The Programme enables Kazakhstan citizens to procure residential real estate on a primary market under conditions that are more preferential in comparison with those applicable in second-tier banks ("STB") for mortgage loans.

The Bank issues loans in accordance with the conditions of the Programme: includes into bank loan contracts the terms and conditions of obligation and responsibility of a borrower to repay a loan, establishes a repayment schedule and ensures maintaining a loan file containing information and documents in compliance with the requirements of the laws of the RK.

Once a loan has been issued, the Bank should transfer rights of claim on loans by transferring to the Operator the documents as agreed in the contract, not more often than once in 10 business days.

In accordance with the Programme and Trust Management Contract, the Bank acts as a trustee for loans received and ensures trust management of transferred loans and proper maintenance of a credit file. Compensation for trust management is paid in the amount and in timeframe established by the trust management contract and amounted to 4% of the carrying amount of assets at the end of each month. In case of partial repayment of interest by the borrowers, a trust management fee is calculated pro rated to the interest paid.

The Bank is obliged to repurchase rights of claim on transferred mortgage loans when the loan principal amount and interest are overdue more than 90 calendar days.

The lending conditions under the Program are as follows:

- Annual nominal interest rate: 7%;
- Loan term: up to 25 years; initial instalment: no less and no more than 20% of cost of collateralised housing real estate;
- Maximum cost of housing real estate acquired: KZT 25 million - for cities of Astana, Almaty, Atyrau, Aktau, Shymkent and KZT 15 million – for other regions of the RK;
- Collateral security: real estate purchased on a primary market;
- Loan origination and servicing fee: is not charged.

To be eligible for a loan under the Programme, an individual must meet the following requirements:

— be a citizen of the Republic of Kazakhstan;

— have documentary supported income;

— no outstanding debt on mortgage loans;

— no owned housing real estate in the Republic of Kazakhstan, other than: dorm rooms with useful area of no more than 15 square meters per each family member, dilapidated housing which may ruin (breakdown) as certified by a corresponding document by a local executive bod where such housing facility is located.

As at 31 December 2021, as many as 15,619 loans worth over KZT 192,361 million have been issued under the '7-20-25' programme (2020: the Bank issued 10,786 loans for KZT 125,681 million).

To enhance possibilities for Kazakhstan citizens to purchase housing facilities, on 28 December 2018 the Bank launched a mortgage loan program named "Baspana Hit". Under this Program, loans are issued for purchasing real estate on both primary and secondary housing markets.

The lending conditions under "Baspana Hit" Program are as follows:

- Interest rate is calculated with the formula: base rate of the National Bank of the RK + 175 basis points
- Loan term: up to 15 years; initial instalment: at least 20% of cost of acquired housing real estat

(in millions of Kazakhstani tenge unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(g) Continuing involvement in asset, continued

The lending conditions under "Baspana Hit" Program are as follows: continued

- Maximum cost of housing real estate acquired – KZT 25 million for cities of Astana, Almaty, Atyrau, Aktau, and KZT 15 million – for other regions of the RK;
- To be eligible for a loan under the Programme, an individual must meet the following requirements:
  - be a citizen of the Republic of Kazakhstan;
  - have documentary supported income;
  - no outstanding debt on mortgage loans.

As at 31 December 2021, as many as 15,731 loans worth over KZT 160,769 million have been issued under the 'Baspana Hit' program (31 December 2020: as many as 10,045 loans for the amount of KZT 95,462 million).

In 2021, the Baspana Hit program was completed due to full utilisation by the second-tier banks of the limits issued.

(h) Transfer of financial assets

During 2021, the Bank sold a portfolio of mortgage loans at its carrying amount, the balance of which amounted to KZT 311,003 million at the year-end (31 December 2020: KZT 210,890 million) and issued a customer a guarantee of reverse repurchase or exchange of certain loans, if loans are overdue for more than 90 days. The amount of reverse repurchase or exchange is not limited. Reverse repurchase is performed at the loan nominal value (outstanding principal and interest accrued) as of the purchase date.

The Bank has determined that it neither transfers nor retains substantially all the risks and rewards of ownership of the financial asset transferred; however, the Bank has determined that it retains control over the assets transferred and continues recognising thereof to the extent of continuing involvement in the assets transferred. As the Bank's continuing involvement takes a form of the guarantee on the asset transferred, the extent of the Bank's continuing involvement is determined equal to maximum amount of consideration received that the Bank has to return. The Bank believes that the value of the guarantee is high enough and this guarantee will prevent the Operator from selling of the asset transferred thereto, as such sale will be impracticable.

The Bank's continuing involvement in said transferred portfolio is recorded in the separate statement of financial position within the loans to customers (Note 16) in the amount of KZT 311,613 million, which is equal to the respective liability from continuing involvement, which is included in other liabilities (Note 23).

The Bank has determined that the carrying amount of the transferred portfolio of mortgage loans reflects its fair value.

17. PROPERTY, PLANT AND EQUIPMENT AND INTANGIBLE ASSETS

	Buildings and constructions	Furniture and equipment	Construction in progress	Intangible assets	Total
Cost/revalued amount					
1 January 2020	**21,977**	**18,407**	**13**	**10,740**	**51,137**
Additions	3,421	2,007	-	938	6,366
Transfers	2,013	-	-	-	2,013
Disposals	(3,950)	(488)	-	(68)	(4,506)
31 December 2020	**23,461**	**19,926**	**13**	**11,610**	**55,010**
Additions	-	2,081	94	1,902	4,077
Internal transfer	-	97	(94)	-	3
Disposals	(8,512)	(1,883)	-	(367)	(10,762)
31 December 2021	**14,949**	**20,221**	**13**	**13,145**	**48,328**
Accumulated depreciation, amortisation and impairment					
1 January 2020	(738)	(9,252)	-	(5,592)	(15,582)
Charge for the year	(352)	(1,837)	-	(982)	(3,171)
Disposals	962	336	-	68	1,366
31 December 2020	**(128)**	**(10,753)**	**-**	**(6,506)**	**(17,387)**
Charge for the year	(178)	(2,328)	-	(1,104)	(3,610)
Disposals	51	1,862	-	367	2,280
31 December 2021	**(255)**	**(11,219)**	**-**	**(7,243)**	**(18,717)**
Net carrying amount					
31 December 2021	**14,694**	**9,002**	**13**	**5.902**	**29,611**
31 December 2020	**23,333**	**9,173**	**13**	**5,104**	**37,623**

(in millions of Kazakhstani tenge unless otherwise stated)

17. PROPERTY, PLANT AND EQUIPMENT AND INTANGIBLE ASSETS, CONTINUED

Intangible assets comprise software, patents and licenses.

The Bank revalued its buildings and constructions during 2021. Evaluation was performed by independent appraisers. Independent appraisers used two approaches to measure the fair value of property and equipment – comparative approach using the market information to measure fair value of buildings and constructions under active market conditions, and cost approach, when no active market existed for items subject to revaluation. As at 31 December 2021 and 31 December 2020, total fair value of buildings and constructions was KZT 14,694 million and KZT 23,333 million, respectively. If buildings and constructions of the Bank had been valued at cost, their carrying amount would have been KZT 12,079 million and KZT 19,327 million as at 31 December 2021 and 31 December 2020, respectively.

Fair values of buildings and constructions are categorised into Levels 2 and 3 of the fair value hierarchy.

18. OTHER ASSETS

	31 December 2021	31 December 2020
Other financial assets		
Account balance with Kazakhstan Stock Exchange	6,427	2,801
Mutual settlements with international payment system (VISA International, Mastercard)	6,554	2,553
Receivables from sale of owned assets	7,409	5,200
Other receivables	3,968	2,429
Accrued commission	5,304	6,647
Western Union and other wireless transfers	373	507
	30,035	**20,137**
Allowance for expected credit losses	(1,614)	(1,633)
	28,421	**18,504**
Other non-financial assets		
Repossessed collateral	28,007	32,720
Receivables under joint arrangements	10,006	10,006
Payment receivable on repossessed collateral	1,179	2,048
Taxes receivable other than income tax	381	311
Advances paid	1,237	1,074
Inventories	23	32
Other assets	1,154	1,035
	41,987	**47,226**
Allowance for expected credit losses	-	(749)
	70,408	**64,981**

In May 2020, the Bank entered into joint arrangement with the construction company RAMS Kazakhstan LLP, to sell land plots intended for construction of a multi-purpose housing estate worth KZT 10,006 million. Under the terms and conditions of the contract, payments for land plots will be cashless and made through transfer into the ownership of the Bank a part of residential and non-residential premises of the housing estate. Non-cash consideration was measured at fair value as of the sale date. Income from the transaction recognised in the separate statement of profit and loss and included in 'other income' line was KZT 7,795 million.

	2021	2020
Other income		
Income from a joint arrangement	-	7,795
Dividends from subsidiaries	932	3,851
Gain on revaluation of property, plant and equipment	-	1,460
Other	(906)	762
	26	**13,868**

As at 31 December 2021 other financial assets of KZT 26,713 million were categorised into Stage 1 of the credit risk grading (31 December 2020: KZT 17,909 million), KZT 2,042 million and KZT 1,280 million are categorised into Stages 2 and 3 of the credit risk grading, respectively (31 December 2020: KZT 1,369 million and KZT 858 million, respectively).

Movements in allowance for expected credit losses for other financial assets are as follows:

2021	Stage 1	Stage 2	Stage 3	Total
Balance at 1 January	**(705)**	**(70)**	**(858)**	**(1,633)**
Net remeasurement of loss allowance	609	(350)	(1,847)	(1,588)
Write-offs	-	-	1,607	1,607
Balance at 31 December	**(96)**	**(420)**	**(1,098)**	**(1,614)**

(in millions of Kazakhstani tenge unless otherwise stated)

18. OTHER ASSETS, CONTINUED

2020	Stage 1	Stage 2	Stage 3	Total
Balance at 1 January	(705)	(70)	(1,690)	(2,465)
Net remeasurement of loss allowance	-	-	(645)	(645)
Write-offs	-	-	1,477	1,477
Balance at 31 December	**(705)**	**(70)**	**(858)**	**(1,633)**

Repossessed collateral Repossessed collateral represents real estate accepted by the Bank in exchange for its liabilities on impaired loans. These assets have been initially recognised at fair value and subsequently measured at the lower of fair value less cost to dispose or the carrying value. The Bank's policy is to sell these assets as soon as it is practicable.

When measuring the fair values as at 31 December 2021, management used the market approach, which is based on an analysis of the prices of the latest comparable sales of similar properties, and the income approach. The following assumptions were used in applying the income approach:

— Cash flows were estimated taking into account market rental rates and occupancy rates.

— The present value of cash flows was determined using the discount rate of 17.50%.

Payment receivable on repossessed collateral. Payment on repossessed collateral comprises prepayments for repossessed collateral which is acquired through auctions.

19. DUE TO BANKS AND FINANCIAL INSTITUTIONS

	Nominal interest rate, %	31 December 2021	Nominal interest rate, %	31 December 2020
Long-term loans due to banks and financial institutions	1.00-4.50	25,934	1.00-4.50	32,828
Proceeds from borrowings under the soft lending programme for business entities	-	-		50,810
Loans due to international credit organisations	10.35-11.55	27,343	8.95-9.95	26,397
Correspondent accounts of banks	-	1,670		6,471
Loan due to NBRK	9.75	10	9.00	61
Accrued interest expense		414		348
		55,371		**116,915**

Long-term loans due to banks and financial institutions

Long-term loans due to banks and financial institutions comprise long-term loans from Entrepreneurship Development Fund DAMU JSC ("DAMU JSC") and Development Bank of Kazakhstan JSC ("DBK JSC") in the amount of KZT 14,141 million at 1.0%-4.5% p.a. maturing in 2023-2035, and of KZT 11,793 million at 1%-2% p.a. maturing in 2034-2037, as at 31 December 2021, respectively (31 December 2020: KZT 17,031 million and KZT 15,807 million, respectively). During 2021 and 2020, the Bank has been repaying principal and interest according to the repayment schedules. Loans from JSC DAMU are not secured by debt securities (2020: KZT 5,272 million).

During the year ended 31 December 2021, the Bank received no additional tranches of long-term loans from DBK JSC (the year ended 31 December 2020: KZT 2,000 million). The loans have been received for further financing of large-sized enterprises ("LSE") operating in the processing industry and further financing of retail customers who purchase cars produced in Kazakhstan.

During 2021, the Bank repaid the long-term loan due to DAMU JSC in the amount of 2,890 million bearing an interest rate of 4.3-4.5% per annum. (2020: KZT 18,960 million bearing an interest rate of 4.3-9.8% per annum).

Loans under the Preferential Lending Programme for small and medium-sized enterprises (the "Programme").

As at 31 December 2020, loans of KZT 50,810 million under the Programme comprise loans from KSF JSC, which mature in 2021 and are intended for extending loans to enterprises, which were adversely affected by the state of emergency imposed by the Government to mitigate the impact of the COVID-19 pandemic. As at 31 December 2021 the funds were repaid to KSF JSC due to termination of the Programme.

The loans from JSC DAMU were received in accordance with the Government programme to finance small and medium enterprises ("SME") of certain industries ("the Programme"). Under the loan agreement between DAMU and the Bank, the Bank extends loans to SME borrowers, eligible to participate in the Programme, at the interest rate with margin of 4% and with maturity not exceeding 10 years. The Bank's obligation to repay the loan to DAMU is not contingent on collectability of the loans extended to SME borrowers. The Bank is obligated to pay a 15% penalty on the amounts not extended to SME borrowers within 3-9 months after receiving money from DAMU.

(in millions of Kazakhstani tenge unless otherwise stated)

19. DUE TO BANKS AND FINANCIAL INSTITUTIONS, CONTINUED

Loans under the Preferential Lending Programme for small and medium-sized enterprises (the "Programme"), continued

The Bank management believes that there are no other financial instruments similar to loans received from DAMU, DBK JSC and Agrarian Credit Corporation JSC at the interest rates of 1-2% p.a. and due to specific nature of LSE and SME clients, this product represents a separate market. As a result, the loans received from DAMU, DBK JSC and Agrarian Credit Corporation JSC at the interest rates of 1-2% p.a. Represent the orderly transactions and as such have been recorded at fair value at the recognition date.

Loans due to international credit organisations.

Loans due to international credit organisations comprise loans from the European Bank for Reconstruction and Development ("EBRD") at 10.35%-11.05% p.a. maturing in 2023-2024.

During the year ended 31 December 2021, the Bank received a loan from European Bank for Reconstruction and Development JSC in the amount of KZT 14,934 million at the interest rate of 12% p.a. maturing in 2024. During 2021, the Bank repaid principal and interest according to the repayment schedules in the amount of KZT 4,614 million and repaid, ahead of schedule, principal and interest in the total amount of KZT 9,234 million.

During the year ended 31 December 2020, the Bank received a loan from European Bank for Reconstruction and Development JSC in the amount of KZT 17,574 million at 7.65%-9.75% p.a. maturing in 2023. During 2020, the Bank repaid principal and interest according to the repayment schedules in the amount of KZT 9,744 million.

Loans due to international credit organisations are collaterised by debt securities of KZT 31,136 thousand (2020: KZT 19,544 million) (Note 13).

The Bank is obligated to comply with financial covenants in relation to due to and loans from financial institutions mentioned above. These covenants include the established ratios including debt-to-equity ratios and other coefficients used for financial performance ratios. As at 31 December 2021 and as at 31 December 2020, the Bank has not breached any of these covenants.

20. CUSTOMER ACCOUNTS

	31 December 2021	31 December 2020
Customer accounts		
Retail	782,121	676,320
Corporate	573,587	513,257
	1,355,708	**1,189,577**

	31 December 2021	31 December 2020
Term deposits	960,391	869,195
Call deposits	390,362	315,395
	1,350,753	**1,184,590**
Accrued interest	4,955	4,987
	1,355,708	**1,189,577**

As at 31 December 2021, the Bank has one customer (31 December 2020: one customer), whose balances exceed 10% of equity. The gross value of these balances as at 31 December 2021 are KZT 26,032 thousand (31 December 2020: KZT 42,190 million).

	31 December 2021	31 December 2020
Analysis by sectors:		
Individuals	782,121	676,320
Construction	120,761	123,938
Education and health care	88,426	43,751
Trade	85,222	72,716
Social services	83,487	122,874
Transportation and communication	36,369	24,990
Power engineering	19,476	11,461
Oil and gas industry	18,139	16,596
Manufacturing	17,675	16,260
Agriculture	15,496	13,342
Entertainment	7,403	4,596
Metallurgy	7,312	4,080
Fuel	6,341	9,034
Research and development	5,517	7,295
Insurance and pension fund activities	3,671	2,330
Machinery manufacturing	2,733	1,423
Public administration	2,705	2,186
Chemical production	2,453	1,900
Other	50,401	34,485
Total customer accounts	**1,355,708**	**1,189,577**

(in millions of Kazakhstani tenge unless otherwise stated)

21. DEBT SECURITIES ISSUED

	Currency	Issue issue	Maturity date	Interest rate, %	31 December 2021	Interest rate, %	31 December 2020
	KZT	16/03/2015-27/12/2018	16/03/2022-05/02/2028	8.50-12.00	81,518	8.50-12.00	75,652
	US Dollar	10/06/2019	10/06/2021	-	-	4.50	5,093
Bonds issued in Kazakhstan	US Dollar	03/03/2006	Perpetual	6.19	25,734	6.27	28,259
					107,252		**109,004**
Accrued interest					1,400		1,322
					108,652		**110,326**

Coupons on debt securities issued are repayable semi-annually; principal is repayable at maturity. Interest payment dates for perpetual instruments are: March 3, June 3, September 3, and December 3; payments are made annually.

22. SUBORDINATED BONDS

	Currency	Issue date	Maturity date	Interest rate, %	31 December 2021	Interest rate, %	31 December 2020
Fixed rate	KZT	27/11/2009-03/11/2017	27/11/2024-03/11/2032	4.00-11.00	54,471	4.00-11.00	53,167
Floating rate	KZT	05/12/2007 - 11/11/2008	05/12/2022-11/11/2023	9.70-9.90	8,438	8.00	8.408
					62,909		**61,575**
Accrued interest					1,095		1,079
					64,004		**62,654**

Coupons on subordinated bonds are repayable semi-annually, principal is repayable at maturity.

Participation in the Programme of Strengthening of the Banking Sector Financial Stability

Resolution of the NBRK No.191 dated 10 October 2017 approved the Bank's participation in the Programme of Strengthening Financial Stability of Banking Sector of the Republic of Kazakhstan (the "Programme").

In accordance with the terms of the Programme, the Bank received cash from the NBRK subsidiary – Kazakhstan Sustainability Fund JSC by means of issue of registered coupon subordinated bonds of the Bank (the "Bonds") convertible into the Bank's ordinary shares on the terms provided for in the Bond Issue Prospectus.

The Bank is subject to restrictions (covenants) in its activities valid for 5 years from the Bonds' issue date, breach of any of each will result in exercising by the Bonds' holders of their right of Bonds being converted to the Bank's ordinary shares:

- the Bank undertakes to comply with capital adequacy ratios set by the authorised body for the second-tier banks of the Republic of Kazakhstan;
- the Bank undertakes not to commit action intended to withdraw the Bank's assets; at that, summary of activities to be considered the withdrawal of assets is set out in the Bond Issue Prospectus.

Within the framework of the Bank's participation in the Programme, on 3 November 2017, the Bank placed the Bonds at Kazakhstan Stock Exchange in the amount of KZT 60,000 million with 15-year maturity and coupon rate of 4.00% per year. Unwinding of discount of the Bonds using the market interest rate of 13%, which was recognised as income in the statement of profit or loss at initial recognition of the Bonds, is KZT 34,993 million. As at 31 December 2021, the carrying amount of the Bonds is KZT 25,855 million (31 December 2020: KZT 24,604 million).

(in millions of Kazakhstani tenge unless otherwise stated)

22. SUBORDINATED BONDS, CONTINUED

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

	Liabilities		
	Debt securities issued	**Subordinated bonds**	**Total**
Balance at 1 January 2020	**114,597**	**61,471**	**176,068**
Changes from financing cash flows			
Repayment of debt securities issued	(8,960)	-	(8,960)
Total changes from financing cash flows	**(8,960)**	-	**(8,960)**
Changes in carrying amount from recognition of discount	**1,053**	**1,303**	**2,356**
Other changes	**2,317**	**(1,200)**	**1,117**
Interest expense	11,364	7,185	18,549
Interest paid	(10,045)	(6,105)	(16,150)
Balance at 31 December 2020	**110,326**	**62,654**	**172,980**

	Liabilities		
	Debt securities issued	**Subordinated bonds**	**Total**
Balance at 1 January 2021	**110,326**	**62,654**	**172,980**
Changes from financing cash flows			
Proceeds from debt securities issued	5,300	-	5,300
Repayment of debt securities issued	(5,163)	-	(5,163)
Repayment of debt securities issued	(3,255)	-	(3,255)
Total changes from financing cash flows	**(3,118)**	-	**(3,118)**
Changes in carrying amount from recognition of discount	**821**	**1,480**	**2,301**
Other changes	**607**	**(1,499)**	**(892)**
Interest expense	10,552	7,460	18,012
Interest paid	(10,536)	(6,091)	(16,627)
Balance at 31 December 2021	**108,652**	**64,004**	**172,656**

23. OTHER LIABILITIES

	31 December 2021	**31 December 2020**
Other financial liabilities:		
Liability from continuing involvement (Note 16(g))	311,631	210,889
Liabilities on guarantees issued	4,963	5,946
Settlements on other liabilities	4,692	5,916
Provisions for guarantees and letters of credit	1,191	667
Accrued commission expenses	1,065	144
	323,542	**223,562**
Other non-financial liabilities:		
Taxes payable other than income tax	1,060	1,299
Other non-financial liabilities	286	277
Total other liabilities	**324,888**	**225,138**

24. SHARE CAPITAL

As at 31 December 2021 the Bank's share capital comprises the following:

	Authorised share capital	**Unissued share capital**	**Placement of authorised ordinary shares**	**Repurchased share capital from shareholders**	**Total share capital**
Ordinary shares	1,211,140,611	(1,031,130,712)	8,019,136	-	188,029,035
Preference shares, items	39,249,255	-	-	(39,126,114)	123,141

8,019,136 ordinary shares of the total value of KZT 2,406 million were placed in May 2021, with a placement price of KZT 300 per share.

As at 31 December 2021 the Bank's share capital comprises the following:

	Authorised and issued share capital	**Placement of authorised ordinary shares**	**Total**
Ordinary shares	63,347	2,406	65,753
Preference shares	89	-	89
	63,436	**2,406**	**65,842**

24. SHARE CAPITAL, CONTINUED

As at 31 December 2020 the Bank's share capital comprises the following:

	Authorised share capital	Unissued share capital	Placement of authorised ordinary shares	Repurchased share capital from shareholders	Total share capital
Ordinary shares	1,211,140,611	(1,045,502,700)	14,371,988	-	180,009,899
Preference shares, items	39,249,255	-	-	(38,953,841)	295,414

14,371,988 ordinary shares of the total value of KZT 4,312 million were placed in May 2020, with a placement price of KZT 300 per share.

As at 31 December 2020 the Bank's share capital comprises the following:

	Authorised and issued share capital	Placement of authorised ordinary shares	Total
Ordinary shares	59,035	4,312	63,347
Preference shares	89	-	89
	59,124	**4,312**	**63,436**

All ordinary shares are ranked equally, carry one vote, and have no par value.

Preference shares are cumulative and convertible into ordinary shares according to the decision of the Board of Directors, one preferred share can be exchanged for one ordinary share. According to the legislation of the Republic of Kazakhstan and Bank's incorporation documents, dividends are payable on ordinary shares in the form of cash or securities of the Bank, on condition that the decision was made at the annual meeting of shareholders of the Bank. In accordance with the Bank's Charter, dividend on ordinary shares are paid on the basis of financial results for the year. Distributable reserves are subject to rules and regulations of the Republic of Kazakhstan.

Terms of preference shares require that the Bank pays dividends per one preference share as follows: **R = (b + 3.5%) x 300**, where

R is a guaranteed amount of dividends per one preference share convertible into an ordinary share, which is calculated in tenge;

b is a base rate of the NBRK. The base rate is determined as at the first day of the year following the year, in which dividends on preference shares were paid. In this regard the guaranteed amount of dividends per one preference share is set at the level of not less than 12% and not more than 14% per annum.

Dividends on preference shares are paid to comply with the legislation of the Republic of Kazakhstan. This legislation envisages that joint stock companies pay the fixed guaranteed amount of the dividend on the preference shares. According to Kazakhstan law on joint stock companies, the amount of the dividend paid on the ordinary shares may not exceed the amount of the dividends paid on preference shares. In addition, dividends on ordinary shares may not be paid until dividends on preference shares have been paid in full.

	For the year ended 31 December 2021 Quantity (in thousands)	For the year ended 31 December 2020 Quantity (in thousands)
Preference shares, beginning of the year	295	295
Treasury shares purchased	(172)	-
Preference shares at the end of the year	**123**	**295**
Ordinary shares at the beginning of the year	**180,010**	**165,638**
Placement of authorised ordinary shares	8,019	14,372
Ordinary shares as at the end of the year	**188,029**	**180,010**

Reserves for general banking risks

Until 2013, in accordance with amendments to the Resolution No. 196 "On Establishment of Minimum Limit on Reserve Capital of Second-Tier Banks" issued by the Agency of the Republic of Kazakhstan on the Regulation and Supervision of Financial Markets and Financial Organisations (the "FMSA") introduced on 31 January 2011 (that became invalid in 2013), the Bank had to establish reserve capital by transferring an amount from retained earnings to provision for future expected losses.

As at 31 December 2021, reserve for general banking risks of the Bank included in retained earnings in the separate statement of financial position of the Bank amounts to KZT 4,981 million (31 December 2020: KZT 4,981 million).

(in millions of Kazakhstani tenge unless otherwise stated)

24. SHARE CAPITAL, CONTINUED

Earnings per share

Basic and diluted earnings per share are presented on consolidated basis in accordance with IAS 33 *Earnings per share.*

	Year ended 31 December 2021	Year ended 31 December 2020
Basic earnings per share		
Consolidated net earnings attributable to shareholders of the Bank	20,645	12,509
Less: additional dividends payable upon full distribution of profit to the preferred share holders	(13)	(7)
Consolidated net earnings attributable to ordinary shareholders	**20,632**	**12,502**
Weighted average number of ordinary shares for purposes of basic earnings per share	179,627,165	168,050,441
Basic earnings per share (in KZT)	**114.86**	**74.39**
Diluted earnings per share		
Consolidated net earnings attributable to ordinary shareholders	20,632	12,502
Add: additional dividends payable upon full distributions of profit to the preferred shareholders	13	7
Consolidated earnings used in calculation of diluted earnings per share	20,645	12,509
Weighted average number of ordinary shares	179,627,165	168,050,441
Shares deemed to be issued:		
Weighted average number of ordinary shares that would be issued for the convertible preferred shares	101,905	100,696
Weighted average number of ordinary shares for purposes of diluted earnings per share	179,729,070	168,151,137
Diluted earnings per share (tenge)	**114.87**	**74.39**

25. SEGMENT REPORTING

The segment information below is presented on the basis used by the Bank's chief operating decision maker to evaluate performance, in accordance with IFRS 8 and in accordance with the segment reporting presented in the separate financial statements for the year ended 31 December 2021 and 2020. The Bank's reporting segments under IFRS 8 are as follows:

- Corporate banking – maintenance of settlement accounts, deposit taking, provisions of overdrafts, loan and other credit facilities.
- Retail banking – provisions of private banking services, private customer current accounts, taking of savings, deposits, investment savings products, custody, credit and debit cards, consumer loans and mortgage
- Investment banking – financial instruments trading, money market operations, repo agreements, foreign currency and derivative products, structured financing, corporate lease and asset management services, merger and acquisitions advice, provision of Bank's funding through issue of debt securities and attracting loans. This segment is responsible for redistribution of funds attracted by other segments.

The accounting policies of the operating segments are the same as those described in the summary of significant accounting policies, of these separate financial statements. The Board of Directors reviews discrete financial information for each of its segments, including measures of operating income, assets and liabilities. The segments are managed primarily on the basis of their results, which do not include the effects of intragroup eliminations.

Segment assets and liabilities comprise all assets and liabilities, which account for the major portion of the separate statement of financial position but excluding such item as taxation. Internal charges and transfer pricing adjustments have been reflected in the performance of each business. All revenues and expenses are attributable only to external customers, and there are no transactions between business segments.

Therefore, the Bank presents its business on the basis of three main segments. Segment information about these businesses is presented below.

(in millions of Kazakhstani tenge unless otherwise stated)

25. SEGMENT REPORTING, CONTINUED

	Retail banking	Corporate banking	Investment banking	For the year ended 31 December 2021
Interest income calculated using effective interest method	55,394	46,723	32,459	134,576
Interest expense	(39,645)	(14,619)	(18,015)	(72,279)
Credit loss allowance for interest-bearing assets	(12,162)	(13,607)	-	(25,769)
Net non-interest income	25,302	1,777	47	27,126
Operating expenses	(18,910)	(11,551)	(13,906)	(44,367)
Profit before income tax	**9,979**	**8,723**	**585**	**19,287**
Segment assets*	641,490	957,802	466,997	2,066,289
Segment liabilities*	783,904	897,838	226,881	1,908,623
Other segment items				
Depreciation/amortisation expense on property, plant and equipment and intangible assets	(1,558)	(825)	(1,227)	(3,610)
Loans to customers and banks	640,956	536,377	-	1,177,333
Customer accounts	782,121	573,587	-	1,355,708
Financial guarantees and credit-related commitments	27,485	118,640	-	146,125

* - net of current and deferred income tax. Income tax expense is not allocated.

	Retail banking	Corporate banking	Investment banking	For the year ended 31 December 2020
Interest income calculated using effective interest method	53,013	50,119	19,011	122,143
Interest expense	(33,037)	(13,743)	(18,549)	(65,329)
Credit loss allowance for interest-bearing assets	(13,915)	(33,646)	-	(47,561)
Net non-interest income	6,544	30,604	2,209	39,357
Operating expenses	(9,988)	(23,848)	(4,559)	(38,395)
Profit/(loss) before income tax	**2,617**	**9,486**	**(1,888)**	**10,215**
Segment assets*	499,214	970,090	373,972	1,843,276
Segment liabilities*	677,441	865,114	162,055	1,704,610
Other segment items				
Depreciation/amortisation expense on property, plant and equipment and intangible assets	(813)	(2,128)	(230)	(3,171)
Loans to customers and banks	498,688	554,326	-	1,053,014
Customer accounts	676,320	513,257	-	1,189,577
Financial guarantees and credit related commitments	9,222	128,888	-	138,110

* - net of current and deferred income tax. Income tax expense is not allocated.

The majority of the Bank's assets are located in the Republic of Kazakhstan and the Bank generates income from operations conducted within the Republic of Kazakhstan.

Major customers

For the year ended 31 December 2021 the reporting segments have no corporate and retail customers (for the year ended 31 December 2020: no corporate and retail customers), whose income from transactions individually exceed 10% of the total income of the Bank.

(a) Corporate governance structure

The Bank was established as an open joint-stock company in accordance with the requirements of the legislation of the Republic of Kazakhstan. The Bank's highest body is the general meeting of the shareholders, which is convened to hold the annual and extraordinary meetings. The general meeting of shareholders makes strategic decisions related to the Bank's operations.

The general meeting of shareholders determines the structure of the Board of Directors. The Board of Directors has overall responsibility for the general management of the Bank's activity.

26. RISK MANAGEMENT POLICY

(a) Corporate governance structure, continued

The legislation of the Republic of Kazakhstan and Bank's Charter determine the lists of decisions, which are exclusively approved by the general shareholders' meeting and that are approved by the Board of Directors.

The Board of Directors meeting elects the Chairman of Management Board, determines the structure of the Management Board. The Bank's executive bodies are responsible for implementation of the decision made by the general meeting of shareholders and Board of Directors. The Bank's executive bodies are subordinated to the Board of Directors and general meeting of shareholders.

(b) Risk management policies and procedures

Management of risk is fundamental to the business of banking and forms an essential element of the Bank's operations. The major (significant) risks faced by the Bank are those related to market risk, credit risk, liquidity risk and operating risk, legal risk and reputational risk

The Bank's risk management policies aim to identify, analyse and manage the risks faced by the Bank, to set appropriate risk limits and controls, and to continuously monitor risk levels and adherence to limits. Risk management policies and procedures are reviewed regularly to reflect changes in market conditions, bank products and services offered and emerging best practice.

As at 31 December 2021, the Bank's internal documentation establishing the procedures and methodologies for identification, managing and stress-testing the Bank's significant risks, was approved by the authorized management bodies of the Bank in accordance with regulations and recommendations issued by the NBKR.

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 Management Board is responsible for monitoring and implementing risk mitigation measures, and ensuring that the Bank operates within established risk parameters. Risk Management function (Risk Management Group) is responsible for the overall risk management and compliance functions, ensuring the implementation of common principles and methods for identifying, measuring, managing and reporting both financial and non-financial risks. Risk Management function reports directly to the Chairman of the Management Board and indirectly to the Board of Directors.

Credit, market and liquidity risks, both at the portfolio and transactional levels, are managed and controlled through a system of Credit Committees, Finance and Risk Management Committee (FRMC) and Risk Management Committee (FMC). In order to facilitate efficient and effective decision-making, the Bank established a hierarchy of credit committees, depending on the type and amount of the exposure.

Both external and internal risk factors are identified and managed throughout the organisation. Special attention is given to revealing the whole list of risk factors and determining the level of adequacy of the current risk mitigation procedures.

(c) Market risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. Market risk comprises currency risk, interest rate risk and other price risks. Market risk arises from open positions in interest rate and equity financial instruments, which are exposed to general and specific market movements and changes in the level of volatility of market prices and foreign currency rates.

The objective of market risk management is to manage and control market risk exposures within acceptable parameters, whilst optimising the return on risk.

FRMC, FMC manage interest rate risk and market risk thus ensuring a positive interest margin for the Bank. The Department of Planning and Finance exercises monitoring of the current financial position of the Bank, assesses the Bank's sensitivity to changes in the interest rates and their impact on the Bank's profitability.

The Bank manages its market risk by setting open position limits in relation to financial instruments, interest rate maturity and currency positions and stop-loss limits. These are monitored on a regular basis and reviewed and approved by the Management Board.

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(c) Market risk, continued

(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. The Bank is exposed to the effects of fluctuations in the prevailing levels of market interest rates on its financial position and cash flows. Interest margins may increase as a result of such changes but may also reduce or create losses in the event that unexpected movements occur.

Interest rate sensitivity analysis

The management of interest rate risk based on interest rate gap analysis is supplemented by monitoring the sensitivity of financial assets and liabilities. An analysis of sensitivity of profit or loss and equity (net of taxes) to changes in interest rates (repricing risk) based on a simplified scenario of a 100 basis point (bp) symmetrical fall or rise in all yield curves and positions of interest-bearing assets and liabilities existing as at 31 December 2021 and 2020 is as follows:

	2021		2020	
	Profit or loss KZT million	**Equity KZT million**	**Profit or loss KZT million**	**Equity KZT million**
100 bp parallel fall	(2,342)	(2,342)	(2,008)	(2,008)
100 bp parallel rise	2,342	2,342	2,008	2,008

An analysis of sensitivity of profit or loss and equity as a result of changes in the fair value of financial assets measured at fair value through other comprehensive income due to changes in the interest rates based on positions existing as at 31 December 2021 and 31 December 2020 and a simplified scenario of a 100 basis point (bp) symmetrical fall or rise in all yield curves is as follows:

	2021		2020	
	Profit or loss KZT million	**Equity KZT million**	**Profit or loss KZT million**	**Equity KZT million**
150 bp parallel rise	-	(12,245)	-	(7,005)
150 bp parallel fall	-	15,177	-	6,128

(ii) Currency risk

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

Currency risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in foreign currency exchange rates.

The Treasury Department performs currency risk management through management of open currency position, which enables the Bank to minimise losses from significant fluctuations of exchange rates of national and foreign currencies. The Risk Management Group determines limits on open currency positions and stop-loss. All limits and restrictions are approved by the Management and the Board of Directors. The Treasury Department performs monitoring of the Bank's currency position with the aim to match the requirements of the NBRK

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(c) Market risk, continued

(ii) Currency risk, continued

The following table shows the foreign currency exposure structure of financial assets and liabilities as at 31 December 2021.

	KZT	USD USD 1 = KZT 420.91	EUR EUR 1 = 516.79	Other Currency	31 December 2021 Total
Financial assets:					
Cash and cash equivalents	120,760	114,373	16,056	9,413	260,602
Investment securities at fair value through other comprehensive income	373,827	79,492	5,759	-	459,078
Investment financial assets at amortised cost	-	10,380	-	-	10,380
Due from banks	257	6,313	-	-	6,570
Loans to customers and banks	981,952	174,944	18,227	2,210	1,177,333
Other financial assets	26,223	2,000	156	42	28,421
Total financial assets	**1,503,019**	**387,502**	**40,198**	**11,665**	**1,942,384**
Financial liabilities:					
Due to banks and financial institutions	54,441	925	5	-	55,371
Customer accounts	946,012	359,448	39,734	10,514	1,355,708
Debt securities issued	82,749	25,903	-	-	108,652
Subordinated bonds	64,004	-	-	-	64,004
Other financial liabilities	320,807	2,257	339	139	323,542
Total financial liabilities	**1,468,013**	**388,533**	**40,078**	**10,653**	**1,907,277**
Open position	**35,006**	**(1,031)**	**120**	**1,012**	

The Bank's exposure to foreign currency exchange rate risk as at 31 December 2020 is presented in the table below:

	KZT	USD USD 1 = KZT 420.91	EUR EUR 1 = KZT 516.79	Other currency	31 December 2020 Total
Financial assets:					
Cash and cash equivalents	129,684	132,801	8,747	7,510	278,742
Investment securities at fair value through other comprehensive income	243,887	49,568	2,640	-	296,095
Investment financial assets at amortised cost	-	10,257	-	-	10,257
Due from banks	58,113	5,313	-	-	63,426
Loans to customers and banks	836,778	201,376	14,076	784	1,053,014
Other financial assets	14,233	4,121	134	16	18,504
Total financial assets	**1,282,695**	**403,436**	**25,597**	**8,310**	**1,720,038**
Financial liabilities:					
Due to banks and financial institutions	114,120	2,642	153	-	116,915
Customer accounts	793,313	364,232	25,369	6,663	1,189,577
Debt securities issued	76,795	33,531	-	-	110,326
Subordinated bonds	62,654	-	-	-	62,654
Other financial liabilities	215,228	8,072	212	50	223,562
Total financial liabilities	**1,262,110**	**408,477**	**25,734**	**6,713**	**1,703,034**
Open position	**20,585**	**(5,041)**	**(137)**	**1,597**	**17,004**

A weakening of KZT, as indicated below, against the following currencies at 31 December 2021 and 31 December 2020 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.

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(c) Market risk, continued

(ii) Currency risk, continued

	2021	2020
20% appreciation of USD against KZT	(165)	(807)
20% appreciation of EUR against KZT	19	(22)
20% appreciation of other currencies against KZT	162	256

(iii) Other price risk

Other price risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices (other than those arising from interest rate risk or currency risk), whether those changes are caused by factors specific to the individual financial instrument or its issuer, or factors affecting all similar financial instruments traded in the market. Other price risk arises when the Bank takes a long or short position in a financial instrument.

VAR is a technique that estimates the potential losses that could occur on risk positions as a result of movements in market rates and prices over a specified time horizon and to a given level of confidence. The VAR model used by the Bank is based on a 95 percent confidence level and assumes a 60-day holding period depending on the type of positions. The VAR model used is mainly based on historical simulation. The model derives plausible future scenarios based on historical market rate time series, taking into account inter-relationships between different markets and rates. Potential market price movements are determined with reference to market data from at least the most recent 12 months.

Although VaR is a valuable tool in measuring market risk exposures, it has a number of limitations, especially in less liquid markets as follows:

- the use of historical data as a basis for determining future events may not encompass all possible scenarios, particularly those that are of an extreme nature;
- a 60-day holding period assumes that all positions can be liquidated or hedged within that period. This is considered to be a realistic assumption in almost all cases but may not be the case in situations in which there is severe market illiquidity for a prolonged period
- the use of a 95% confidence level does not take into account losses that may occur beyond this level. There is a five percent probability that the loss could exceed the VAR estimate;
- VaR is only calculated on the end-of-day balances and does not necessarily reflect exposures that may arise on positions during the trading day;
- the VaR measure is dependent on the position and the volatility of market prices. The VAR of an unchanged position reduces if market volatility declines and vice versa.

The Bank does not solely rely on its VAR calculations in its market risk measurement due to inherent risk of usage of VAR as described above. The limitations of the VaR methodology are recognised by supplementing VaR limits with other position and sensitivity limit structures, including limits to address potential concentration risks within each trading portfolio, and gap analysis.

A summary of the VAR estimates of losses that could occur in respect of the portfolio of financial instruments at fair value as at 31 December is as follows:

	31 December 2021	31 December 2020
Foreign exchange risk	345	2,122
	345	**2,122**

(d) Credit risk

Credit risk is the risk of financial loss occurring as a result of default by a borrower or counterparty on their obligation to the Bank. The Bank has policies and procedures in place to manage credit exposures (both for recognised financial assets and unrecognised contractual commitments), including guidelines to limit portfolio concentration and the establishment of a Credit Committee to actively monitor credit risk. The credit policy is reviewed and approved by the Board of Directors upon approval by the Management Board of the Bank.

26. RISK MANAGEMENT POLICY, CONTINUED

(d) Credit risk, continued

The credit policy establishes:

- procedures for reviewing and approving loan credit applications;
- methodology for the credit assessment of borrowers (corporate and retail)
- methodology for the credit assessment of counterparties, issuers and insurance companies;
- methodology for the evaluation of collateral;
- credit documentation requirements;
- procedures for the ongoing monitoring of loans and other credit exposures.

Credit applications from the corporate customers are originated by the relevant credit managers. On-site visit and financial analysis can be made either with or without participation of the credit risk department employees, depending on the authority level and borrower's rating. To comply with the statutory procedures of the regulator for generating a credit file and ensuring internal risk control, the related departments (legal department, security department and credit analysis department) provide their opinions on the project. A credit decision is made by the authorised Credit committees represented by the Credit committees at the levels of branches, regions and the Head Office. In case of review of the credit applications, which are outside of the authority and limits of the branches at the Head Office Credit committees, the Risk Management Group prepares additionally its opinion.

The Bank enters into numerous transactions where the counterparties are not rated by international rating agencies. The Bank has developed internal models, which allow it to determine the rating of counterparties, which are comparable to ratings of international rating agencies. These models include rating models for corporate customers and scoring models for individuals and small business. The Bank uses these instruments for initial measurement of credit risk and pricing of the loans issued.

Scoring models

Scoring is an automated system of customer evaluation, which processes applications from different sales channels, treats these applications and uses the strategies to make accurate decisions on loan granting. The system produces online decision, which allows to standardise and automate the process of making decisions on loan granting and reduce the operating expenses and operating risks.

The system sets the lending strategies comprising the Credit Rules, scoring models and antifraud strategies, which use the customer initial parameters and the product parameters. The input parameters for decision-making are the social and demographic, financial indicators of the customers, as well as data from external sources, such as credit bureau, telecommunication and transaction data, etc.

Credit Rules serve as an instrument for automated check of the applicants against the credit policy. These are a set of conditions, upon passing of which a subject receives a positive decision; or if there are negative indicators arise, a negative decision is made with regard to a customer. Credit Rules are developed and updated on the basis of statistical analyses and customers' behaviour in the market.

A scoring model as a statistical model used for quantitative assessment of future creditworthiness of new and existing borrowers of the Bank. When scoring is used, each of the parameters inserted into scoring model has a numeric value, the sum of which represents the borrower's internal credit score. The assigned score reflects the probability of default of the borrower. Quality of scoring models is checked on the continuous basis for their compliance with international standards by assessing their effectiveness and accuracy.

Antifraud strategy includes a number of checks to prevent the fraud risks on the part of the applicant.

The scoring methodologies are tailor-made for specific products and segments and are applied during the stage of making decision on loan issuance.

The maximum exposure to credit risk is generally reflected in the carrying amounts of financial assets in the separate statement of financial position and unrecognised contractual commitment amounts. The impact of possible netting of assets and liabilities to reduce potential credit exposure is not significant.

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(d) Credit risk, continued

Scoring models, continued

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

	2021	2020
ASSETS		
Cash and cash equivalents	214,314	221,766
Investment financial assets at FVOCI - debt financial instruments	458,517	295,797
Investment financial assets at amortised cost	10,380	10,257
Due from banks	6,570	63,426
Loans to customers and banks	1,177,333	1,053,014
Other financial assets	28,421	18,504
Total maximum exposure	**1,895,535**	**1,662,764**

For the analysis of collateral held against loans to customers and concentration of credit risk in respect of loans to customers, see Note 16.

The maximum exposure to credit risk from unrecognised contractual commitments at the reporting date is presented in Note 28.

The Bank calculates and monitors, on the ongoing basis, the mandatory norm of the maximum risk per one borrower or group of related borrowers, which regulates the Bank's credit risk with regard to a single borrower or group of related borrowers and determines the maximum ratio of the total liabilities of a borrower (borrowers included in the group of related borrowers) to the Bank to the Bank's equity. As at 31 December 2021 and 31 December 2020 the maximum allowable value of k-3 norm established by NBRK was 25%. The value of k-3 norm calculated by the Bank as at 31 December 2021 and 31 December 2020 was in compliance with the statutory norm.

As at 31 December 2021 the Bank did not have debtors or groups of connected debtors, where credit risk exposure exceeded 10% maximum credit risk exposure.

Offsetting financial assets and financial liabilities

The disclosures set out in the tables below include financial assets and financial liabilities that:

- are offset in the Bank's separate statement of financial position; or
- are subject to an enforceable master netting arrangement or similar agreement that covers similar financial instruments, irrespective of whether they are offset in the separate statement of financial position.

Similar financial instruments include derivatives, sales and repurchase agreements, reverse sale and repurchase agreements, and securities borrowing and lending agreements.

The Bank conducts derivative transactions that are not transacted on the exchange through a central counterparty. Management believes that such settlements are, in effect, equivalent to net settlement and that, the Bank meets the net settlement criterion as this gross settlement mechanism has features that eliminate or result in insignificant credit and liquidity risk, and that the Bank will process receivables and payables in a single settlement process or cycle.

The Bank receives and accepts collateral in the form of cash and marketable securities in respect of the following transactions:

- derivatives;
- sale and repurchase, and reverse sale and repurchase agreements; and
- securities lending and borrowing.

Such collateral is subject to the standard industry terms of the International Swaps and Derivatives Association ("ISDA") Credit Support Annex. This means that securities received/given as collateral can be pledged or sold during the term of the transaction but must be returned on maturity of the transaction. The terms also give each counterparty the right to terminate the related transitions upon the counterparty's failure to post collateral.

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(d) Credit risk, continued

Offsetting financial assets and financial liabilities, continued

The following table provides information on financial assets and financial liabilities subject to offsetting, enforceable master netting arrangements and similar arrangements as at 31 December 2021:

Types of financial assets/liabilities	Gross amounts of recognised financial assets/liabilities	Gross amount of recognised financial liability/asset offset in the separate statement of financial position	Net amount of financial assets/liabilities presented in the separate statement of financial position	Related amounts not offset in the separate statement of financial position		Net amount
				Financial instruments	Cash collateral received	
Loans to customers and banks	71,790	-	71,790	-	(13,970)	57,820
Loans under reverse repurchase agreements	35,013	-	35,013	(34,370)	-	643
Total financial assets	**106,803**	**-**	**106,803**	**(34,370)**	**(13,970)**	**58,463**
Current accounts and deposits from customers	13,970	-	13,970	(13,970)	-	-
Total financial liabilities	**13,970**	**-**	**13,970**	**(13,970)**	**-**	**-**

The table below shows financial assets and financial liabilities subject to enforceable master netting arrangements and similar arrangements as at 31 December 2020:

Types of financial assets/liabilities	Gross amounts of recognised financial assets/liabilities	Gross amount of recognised financial liability/asset offset in the separate statement of financial position	Net amount of financial assets/liabilities presented in the separate statement of financial position	Related amounts not offset in the separate statement of financial position		Net amount
				Financial instruments	Cash collateral received	
Loans to customers and banks	72,254	-	72,254	-	(7,600)	64,654
Loans under reverse repurchase agreements	38,853	-	38,853	(38,853)	-	-
Total financial assets	**111,107**	**-**	**111,107**	**(38,853)**	**(7,600)**	**64,654**
Current accounts and deposits from customers	7,601	-	7,601	(7,601)	-	-
Due to banks and financial institutions	-		-	-		
Total financial liabilities	**7,601**	**-**	**7,601**	**(7,601)**	**-**	**-**

The gross amounts of financial assets and financial liabilities and their net amounts as presented in the separate statement of financial position that are disclosed in the above tables are measured in the separate statement of financial position on the following basis:

assets and liabilities resulting from sale and repurchase agreements, reverse sale and repurchase agreements and securities lending and borrowing – amortised cost.

The securities lent under agreements to repurchase represent the transferred financial assets that are not entirely derecognised. The securities lent or sold under agreements to repurchase are transferred to a third party and the Bank receives cash in exchange. These financial assets may be repledged or resold by counterparties in the absence of default by the Bank, but the counterparty has an obligation to return the securities at the maturity of the contract. The Bank has determined that it retains substantially all the risks and rewards of these securities and therefore has not derecognised them. Because the Bank sells the contractual rights to the cash flows of the securities it does not have the ability to use the transferred assets during the term of the agreement.

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(d) Credit risk, continued

Geographical concentration

The Finance and Risk Management Committee ("FRMC") exercises control over the risk in the legislation and regulatory arena and assesses its influence on the Bank's activity. This approach allows the Bank to minimise potential losses from the investment climate fluctuations in the Republic of Kazakhstan.

The geographical concentration of assets and liabilities is set out below:

	Kazakhstan	Non-OECD countries	OECD countries	31 December 2021 Total
Financial assets:				
Cash and cash equivalents	226,657	3,468	30,477	260,602
Investment financial assets at FVOCI	407,221	18,454	33,403	459,078
Investment financial assets at amortised cost	3,192	-	7,188	10,380
Due from banks	257	-	6,313	6,570
Loans to customers and banks	1,177,325	8	-	1,177,333
Other financial assets	28,421	-	-	28,421
Total financial assets	**1,843,073**	**21,930**	**77,381**	**1,942,384**
Financial liabilities:				
Due to banks and financial institutions	26,432	1,241	27,698	55,371
Customer accounts	1,345,714	5,828	4,166	1,355,708
Debt securities issued	82,757	-	25,895	108,652
Subordinated bonds	64,004	-	-	64,004
Other financial liabilities	323,542	-	-	323,542
Total financial liabilities	**1,842,449**	**7,069**	**57,759**	**1,907,277**
Open position	**624**	**14,861**	**19,622**	

	Kazakhstan	Non-OECD countries	OECD countries	31 December 2020 Total
Financial assets:				
Cash and cash equivalents	244,093	1,521	33,128	278,742
Investment financial assets at FVOCI	275,062	7,504	13,529	296,095
Investment financial assets at amortised cost	3,159	-	7,098	10,257
Due from banks	58,113	-	5,313	63,426
Loans to customers and banks	1,052,250	764	-	1,053,014
Other financial assets	18,504	-	-	18,504
Total financial assets	**1,651,181**	**9,789**	**59,068**	**1,720,038**
Financial liabilities:				
Due to banks and financial institutions	87,984	2,322	26,609	116,915
Customer accounts	1,178,796	6,544	4,237	1,189,577
Debt securities issued	81,901	-	28,425	110,326
Subordinated bonds	62,654	-	-	62,654
Other financial liabilities	223,562	-	-	223,562
Total financial liabilities	**1,634,897**	**8,866**	**59,271**	**1,703,034**
Open position	**16,284**	**923**	**(203)**	

26. RISK MANAGEMENT POLICY, CONTINUED

(e) Liquidity risk

Liquidity risk is the risk that the Bank will encounter difficulty in meeting obligations associated with its financial liabilities that are settled by delivering cash or another financial asset. Liquidity risk exists when the maturities of assets and liabilities do not match. The matching and/or controlled mismatching of the maturities and interest rates of assets and liabilities is fundamental to liquidity management. It is unusual for financial institutions ever to be completely matched, since business transacted is often of an uncertain term and of different types. An unmatched position potentially enhances profitability, but can also increase the risk of losses.

The Bank maintains liquidity management with the objective of ensuring that funds will be available at all times to honour all cash flow obligations as they become due. The liquidity policy is reviewed and approved by the Management Board.

The Bank seeks to actively support a diversified and stable funding base comprising debt securities in issue, long- and short-term loans from other banks, core corporate and retail customer deposits, accompanied by diversified portfolios of highly liquid assets, in order to be able to respond quickly and efficiently to unforeseen liquidity requirements.

The Treasury Department performs management of these risks through analysis of asset and liability maturity and performance of money market transactions for current liquidity support and cash flow optimisation. The Department of Planning and Finance determines the optimum structure of balance and limits on liquidity ratios. Gap-positions are approved by the FRMC. The Risk Management Group performs monitoring of liquidity ratios.

The liquidity management policy requires:

- liquidity risk identification and measurement;
- monitoring of liquidity risk and liquidity positions, establishment of reporting system, including prudential and management reporting;
- liquidity risk limitation, formation of the system of limits (restrictions) and early warning indicators;
- stress-testing;
- development of alternative options of liquidity planning, maintaining liquidity and funding contingency plans and their regular review;
- organisation of internal controls over liquidity risk and liquidity risk management, exercise of internal audit;
- disclosure of respective information on liquidity risk and liquidity position.

The following tables show analysis of financial assets and liabilities grouped according to the principle of period remaining from the balance sheet date till maturity date, except for the financial assets through profit or loss and investment financial assets at fair value through other comprehensive income that have been classified as 'on demand and up to 1 month', which may be realised, as necessary, at any time.

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(e) Liquidity risk, continued

31 December 2021	Weighted average effective interest rate	On demand and up to 1 month	1 month to 3 months	3 months to 1 year	1 year to 5 years	Over 5 years	31 December 2020 Total
Financial assets							
Cash and cash equivalents	9.75%	75,062	-	-	-	-	75,062
Investment financial assets at FVOCI	7.37%	458,514	-	-	-	-	458,514
Investment financial assets at amortised cost	4.68%	-	-	-	10,380	-	10,380
Loans to customers and banks	10.76%	92,687	49,723	209,153	462,394	363,376	1,177,333
Total interest bearing financial assets		**626,263**	**49,723**	**209,153**	**472,774**	**363,376**	**1,721,289**
Cash and cash equivalents		185,540	-	-	-	-	185,540
Investment financial assets at FVOCI		564	-	-	-	-	564
Due from banks		6,570	-	-	-	-	6,570
Other financial assets		26,178	-	-	2,243	-	28,421
Total financial assets		**845,115**	**49,723**	**209,153**	**475,017**	**363,376**	**1,942,384**
Financial liabilities							
Due to banks and financial institutions	7.25%	1	2,289	5,876	22,197	23,337	53,700
Customer accounts	6.30%	80,245	147,231	505,630	206,383	16,127	955,616
Debt securities issued	9.36%	-	25,796	-	67,058	15,798	108,652
Subordinated bonds	12.36%	-	-	5,029	32,994	25,981	64,004
Other financial liabilities	3.07%	3,678	4,279	9,414	60,397	233,863	311,631
Total interest-bearing liabilities		**83,924**	**179,595**	**525,949**	**389,029**	**315,106**	**1,493,603**
Due to banks and financial institutions		1,671	-	-	-	-	1,671
Customer accounts		397,743	2	281	601	1,465	400,092
Other financial liabilities		11,911	-	-	-	-	11,911
Total financial liabilities		**495,249**	**179,597**	**526,230**	**389,630**	**316,571**	**1,907,277**
Liquidity gap		349,866	(129,874)	(317,077)	85,387	46,805	
Interest sensitivity gap		542,339	(129,872)	(316,796)	83,745	48,270	
Cumulative interest sensitivity gap		**542,339**	**412,467**	**95,671**	**179,416**	**227,686**	
Cumulative interest sensitivity gap as a percentage of total financial assets		**27.92%**	**21.24%**	**4.93%**	**9.24%**	**11.72%**	

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(e) Liquidity risk, continued

31 December 2020	Weighted average effective interest rate	On demand and up to 1 month	1 month to 3 months	3 months to 1 year	1 year to 5 years	Over 5 years	31 December 2020 Total
Financial assets							
Cash and cash equivalents	7.02%	117,225	-	-	-	-	117,225
Investment financial assets at FVOCI	6.79%	295,797	-	-	-	-	295,797
Investment financial assets at amortised cost	4.74%			36	10,221	-	10,257
Loans to customers and banks	10.78%	112,324	44,859	154,847	400,203	340,781	1,053,014
Total interest-bearing financial assets		**525,346**	**44,859**	**154,883**	**410,424**	**340,781**	**1,476,293**
Cash and cash equivalents		161,517	-	-	-	-	161,517
Investment financial assets at FVOCI		298	-	-	-	-	298
Due from banks		63,426	-	-	-	-	63,426
Other financial assets		18,504	-	-	-	-	18,504
Total financial assets		**769,091**	**44,859**	**154,883**	**410,424**	**340,781**	**1,720,038**
Financial liabilities							
Due to banks and financial institutions	5.74%	-	-	6,659	23,034	29,941	59,634
Customer accounts	6.35%	86,658	84,162	486,213	222,877	17,642	897,552
Debt securities issued	8.99%	-	1,681	5,105	64,514	39,026	110,326
Subordinated bonds	12.04%	-	-	-	38,050	24,604	62,654
Other financial liabilities	3.07%	2,052	4,601	6,007	38,571	159,692	210,923
Total interest bearing liabilities		**88,710**	**90,444**	**503,984**	**387,046**	**270,905**	**1,341,089**
Due to banks and financial institutions		6,471	-	50,810	-	-	57,281
Customer accounts		285,758	12	4,244	360	1,651	292,025
Other financial liabilities		12,639	-	-	-	-	12,639
Total financial liabilities		**393,578**	**90,456**	**559,038**	**387,406**	**272,556**	**1,703,034**
Liquidity gap		375,513	(45,597)	(404,155)	23,018	68,225	
Interest sensitivity gap		436,636	(45,585)	(349,101)	23,378	69,876	
Cumulative interest sensitivity gap		**436,636**	**391,051**	**41,950**	**65,328**	**135,204**	
Cumulative interest sensitivity gap as a percentage of total financial assets		**29.58%**	**22.74%**	**2.44%**	**3.80%**	**7.86%**	

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(e) Liquidity risk, continued

In accordance with Kazakhstan legislation, depositors can withdraw their term deposits at any time, losing in most of the cases the accrued interest. These deposits are classified in accordance with their stated maturity dates.

However, management believes that in spite of this early withdrawal option and the fact that a substantial portion of customer accounts are on demand, diversification of these customer accounts and deposits by number and type of depositors, and the past experience of the Bank indicates that these customer accounts provide a long-term and stable source of funding.

Management expects that the cash flows from certain financial assets and liabilities will be different from their contractual terms, either because management has the discretionary ability to manage the cash flows, or because past experience indicates that cash flows will differ from contractual terms.

A further analysis of the liquidity and interest rate risks is presented in the following tables in accordance with IFRS 7. The amounts disclosed in these tables do not correspond to the amounts recorded on the statement of financial position as the presentation below includes a maturity analysis for financial liabilities that indicates the total remaining contractual payments (including interest payments), which are not recognised in the statement of financial position under the effective interest rate method. To the extent that interest flows are floating rate, the undiscounted amount is derived from interest rate yield curves at the end of the reporting period.

	On demand and up to 1 month	1 month to 3 months	3 months to 1 year	1 month to 5 years	Over 5 years	31 December 2021 Total
Financial liabilities:						
Due to banks and financial institutions	1	3,162	8,218	25,771	26,864	64,016
Customer accounts	120,760	155,370	530,297	216,558	25,118	1,048,103
Debt securities issued	-	27,557	6,908	73,570	44,053	152,088
Subordinated bonds	-	1,108	5,149	54,176	74,020	134,453
Other financial liabilities	5,282	8,731	29,057	153,050	367,150	563,270
Total interest-bearing liabilities	**126,043**	**195,928**	**579,629**	**523,125**	**537,205**	**1,961,930**
Due to banks and financial institutions	1,671	-	-	-	-	1,671
Customer accounts	397,743	2	281	601	1,465	400,092
Other financial liabilities	11,911	-	-	-	-	11,911
Total financial liabilities	**537,368**	**195,930**	**579,910**	**523,726**	**538,670**	**2,375,604**
Financial guarantees and commitments	146,125	-	-	-	-	146,125

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(e) Liquidity risk, continued

	On demand and up to 1 month	1 month to 3 months	3 months to 1 year	1 month to 5 years	Over 5 years	31 December 2020 Total
Financial liabilities:						
Due to banks and financial institutions	597	527	9,041	27,815	34,601	72,581
Customer accounts	90,828	91,589	502,430	232,796	29,849	947,492
Debt securities issued	-	1,681	13,191	97,512	41,701	154,085
Subordinated bonds	-	1,108	4,995	51,579	76,420	134,102
Other financial liabilities	3,587	7,597	19,136	100,910	254,206	385,436
Total interest-bearing liabilities	**95,012**	**102,502**	**548,793**	**510,612**	**436,777**	**1,693,696**
Due to banks and financial institutions	6,471	-	50,810	-	-	57,281
Customer accounts	285,758	12	4,244	360	1,651	292,025
Other financial liabilities	12,639	-	-	-	-	12,639
Total financial liabilities	**399,880**	**102,514**	**603,847**	**510,972**	**438,428**	**2,055,641**
Financial guarantees and commitments	138,110	-	-	-	-	138,110

The timing of cash outflows has been prepared on the following basis:

Prepaid liabilities

Where a financial liability can be prepaid by the counterparty, the cash outflow has been included at the earliest date on which the counterparty can require repayment regardless whether or not such early repayment results in a penalty. If the repayment of financial liability is triggered by, or is subject to, specific criteria such as market price hurdles being reached, it is included at the earliest possible date that the conditions could be fulfilled without considering probability of the conditions being met.

The financial guarantees and commitments are included in the “On demand” category because payments can be required upon request.

(f) Operational risk

Definition of operational risk

Operational risk is the risk of direct or indirect loss arising from a wide variety of causes associated with the Bank’s processes, personnel, technology and infrastructure, and from external factors other than credit, market and liquidity risks, such as those arising from legal and regulatory requirements and generally accepted standards of corporate behaviour. Operational risks arise from all of the Bank’s operations.

The Bank’s objective is to manage operational risk so as to balance the avoidance of financial losses and damage to the Bank’s reputation with overall cost effectiveness and innovation. In all cases, the Bank policy requires compliance with all applicable legal and regulatory requirements.

The Bank manages operational risk by establishing internal controls that management determines to be necessary in each area of its operations.

27 CAPITAL MANAGEMENT

NBRK sets and monitors capital requirements for the Bank as a whole.

Bank defines as capital those items defined by statutory regulation as capital for credit institutions.

- Tier 1 capital is a total of basic and additional capital. Basic capital comprises paid-in ordinary share capital, share premium, current and prior periods' retained earnings and reserves created thereof, less treasury share capital, intangible assets including goodwill, and current and prior periods losses, deferred tax asset net of deferred tax liability, excluding deferred tax assets recognised in relation to deductible temporary differences, other revaluation reserves, gains from sales related to asset securitisation transactions, gains or losses from revaluation of financial liabilities at fair value related to change in own credit risk, regulatory adjustments to be deducted from the additional capital, but due to insufficient levels of it deducted from basic capital, and investments in financial instruments of investees not consolidated in the Bank with certain limitations. Additional capital comprises perpetual contracts and paid-in preference share capital less adjustments for the Bank's investment in its own perpetual financial instruments, treasury preference shares, investments in financial instruments of investees not consolidated in the Bank with certain limitations and regulatory adjustments to be deducted from the Tier 2 capital, but due to insufficient levels of it deducted from additional capital.
- Tier 2 capital comprises subordinated debt in KZT less investments in subordinated debt of financial institutions the Bank holds 10% and more shares in.

Total capital is the sum of tier 1 and tier 2 capital.

There are a set of different limitations and classification criteria applied to the above listed total capital elements.

In accordance with the regulations set by the NBRK the Bank has to maintain total capital adequacy within the following coefficients:

- a ratio of basic capital to the sum of credit risk-weighted assets and contingent liabilities, market risk-weighted assets and contingent assets and liabilities, and quantified operational risk (k1);
- a ratio of tier 1 capital to the sum of credit risk-weighted assets and contingent liabilities, market risk-weighted assets and contingent assets and liabilities, and quantified operational risk (k1-2);
- a ratio of total capital to the sum of credit risk-weighted assets and contingent liabilities, market risk-weighted assets and contingent assets and liabilities, and quantified operational risk (k2).

As at 31 December 2021 the minimum level of ratios as applicable to the Bank are as follows:

- k1 – not less than 0.075 (31 December 2020: 0.065);
- k1-2 – not less than 0.085 (31 December 2020: 0.075);
- k2 – not less than 0.1 (31 December 2020: 0.090).

On 1 October 2019, NBRK introduced a new regulatory capital buffer for the capitalisation ratios. The regulatory capital buffer is calculated as the ratio of positive difference between provisions calculated in accordance with the Impairment Provisioning Guidelines of bank's assets (loans and accounts receivable) to the Ratio, and provisions formed and reflected in the bank's accounting in accordance with IFRS and the requirements of the legislation of the Republic of Kazakhstan on accounting and financial reporting (the "positive difference") to the sum of assets and contingent liabilities weighted by the degree of credit risk.

As at 31 December 2021, the Bank complied with all prudential capital ratios k1, k1-2 and k2, inclusive and exclusive of the regulatory capital buffer, and the actual ratios were 0.128, 0.128 and 0.198 (31 December 2020: k1 – 0.115, k1-2 – 0.115 and k2- 0.191).

As at 31 December 2021, there was no regulatory buffer (31 December 2020: 0.07%) and k1, k1-2 and k2 ratios, including the regulatory capital buffer were 0.075, 0.085 and 0.1, respectively (31 December 2020: 0.0657, 0.0757 and 0.0907, respectively).

The following table shows the composition of the capital position as at 31 December 2021 calculated in accordance with the requirements established by the resolution of Board of National Bank of the Republic of Kazakhstan of the resolution of Board of National Bank of the Republic of Kazakhstan of 13 September 2018, No. 170 "On establishment of normative values and techniques of calculations of prudential standard rates and other regulations, obligatory to observance, and limits of the size of the capital of bank for the certain date and Rules of calculation and limits of the open foreign exchange position of bank" with amendments and additions.

(in millions of Kazakhstani tenge unless otherwise stated)

27 CAPITAL MANAGEMENT, CONTINUED

	31 December 2021	31 December 2020
Tier 1 capital		
Basic capital:	**140,844**	**123,734**
Share capital	65,649	63,242
Statutory retained earnings of prior years	56,531	47,945
Retained earnings of current period	20,434	8,586
Reserves formed from statutory retained earnings of prior years	4,981	4,981
Revaluation surplus for buildings	1,442	1,442
Revaluation reserve of investment securities	(2,291)	2,642
Statutory adjustments:		
Intangible assets	(5,902)	(5,104)
Total basic capital	**140,844**	**123,734**
Additional capital		
Paid-in preference share capital not satisfying basic capital requirements	11,775	11,775
Bank's treasury preference shares	(11,686)	(11,686)
Tier 1 capital	**140,933**	**123,823**
Tier 2 capital		
Subordinated debt	76,343	80,701
Total tier 2 capital	**76,343**	**80,701**
Total capital	**217,276**	**204,524**
Positive difference between regulatory impairment provisions and IFRS impairment provisions	-	(780)
Risk-weighted assets, contingent liabilities and derivative financial instruments and operational risk		
Credit risk-weighted assets	948,527	913,419
Credit risk-weighted contingent liabilities	62,895	84,377
Market risk-weighted assets, contingent assets and liabilities	35,385	16,955
Operational risk	50,007	58,109
Risk-weighted assets, contingent liabilities and derivative financial instruments and operational risk	**1,096,814**	**1,072,860**
k1	**0.128**	**0.115**
k1-2	**0.128**	**0.115**
k2	**0.198**	**0.191**

28. CREDIT RELATED COMMITMENTS

The Bank has outstanding commitments to extend loans. These credit related commitments take the form of approved loans and credit card limits and overdraft facilities.

The Bank provides financial guarantees and letters of credit to guarantee the performance of customers to third parties. These agreements have fixed limits and generally extend for a period of up to five years.

The Bank applies the same credit risk management policies and procedures when granting credit commitments, financial guarantees and letters of credit as it does for granting loans to customers.

The contractual amounts of credit related commitments are set out in the following table by category. The amounts reflected in the table for guarantees and letters of credit represent the maximum accounting loss that would be recognised at the reporting date if the counterparties failed completely to perform as contracted.

(in millions of Kazakhstani tenge unless otherwise stated)

28. CREDIT RELATED COMMITMENTS, CONTINUED

As at 31 December 2021 and 31 December 2020, the nominal values or contractual values and risk-weighted amounts are as follows:

	31 December 2021		31 December 2020	
	Nominal value	Risk-weighted value	Nominal value	Risk-weighted value
Guarantees issued and other similar liabilities	112,530	68,605	124,119	88,078
Credit card commitments	27,485	5,497	9,222	1,844
Letters of credit and other contingent liabilities related to other transaction	6,110	1,222	4,769	954
	146,125	**75,324**	**138,110**	**90,876**

*guarantees issued and other similar liabilities are stated net of cash collateral in the amount of KZT 43,925 million (2020: KZT 36,041 million); credit cards and letters of credit liabilities of 20% of the nominal value.

Management expects that loans and liabilities under credit facilities will be financed as required at the expense of the amounts received from repayment of the current loan portfolio according to the payment schedules.

As at 31 December 2021, the guarantees issued in the amount of KZT 112,126 million and credit cards liabilities of KZT 27,452 million are classified as Stage 1 of credit risk gradings (31 December 2020: KZT 123,279 million and KZT 9,202 million), KZT 215 million and KZT 10 million are classified as Stage 2 of credit risk gradings (31 December 2020: KZT 618 million and KZT 2 million, respectively), and KZT 189 million and KZT 23 million are classified as Stage 3 of credit risk gradings, respectively (31 December 2020: KZT 222 million and KZT 18 million, respectively).

The following tables shows the guarantees issued and other similar liabilities secured by different types of collaterals and not the fair value of the collateral itself.

	31 December 2021	31 December 2020
Cash	43,925	36,041
Real estate	16,500	13,645
Movable property	40	10,009
Corporate guarantees	9,874	9,603
Unsecured	7,847	5,080
Land	15	100
Goods in turnover	-	20
Other	34,329	49,621
Total	**112,530**	**124,119**

The following table shows the letters of credit issued and other contingent liabilities secured by different types of collaterals and not the fair value of the collateral itself.

	31 December 2021	31 December 2020
Cash	6,110	4,769
Total	**6,110**	**4,769**

These commitments do not necessarily represent future cash requirements, as these credit related commitments may expire or terminate without being funded.

29. CUSTODIAN SERVICES

The Bank provides custodian services to individuals, trusts, retirement benefit plans and other institutions, whereby it accounts and holds assets or make settlements on the customers' transactions with different financial instruments at the direction of the customer. The Bank receives fee income for providing these services. Assets received under custodian management are not assets of the Bank and are not recognised in the separate statement of financial position. The Bank is not exposed to any credit risk related to such activities, as it does not guarantee these investments.

Fiduciary assets are categorised as follows based on their nominal value:

	31 December 2021	31 December 2020
Securities	326,492	340,472
Investments in buildings, machinery, equipment, transport and other property	6,048	7,039
Unit investment funds	25	25
Bank deposits	44	43
Other assets	-	-
Total fiduciary assets	**332,609**	**347,579**

29. CUSTODIAN SERVICES, CONTINUED

The Bank keeps accounting and prepares reporting for assets and investment funds, asset management and other legal entities and transactions with assets and makes reconciliation with the management company with regard to the assets being served, in accordance with the requirements of the legislation of the Republic of Kazakhstan and NBRK rules.

30. CONTINGENCIES

(a) Insurance

The insurance industry in the Republic of Kazakhstan is in a developing state and many forms of insurance protection common in other parts of the world are not yet generally available. The Bank does not have full coverage for its premises and equipment, business interruption, or third party liability in respect of property or environmental damage arising from accidents on Bank's property or related to operations. Until the Bank obtains adequate insurance coverage, there is a risk that the loss or destruction of certain assets could have a material adverse effect on operations and financial position.

(b) Litigations

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 conditions or the results of future operations.

(c) Taxation contingencies in Kazakhstan

The taxation system in Kazakhstan is relatively new and is characterised by frequent changes in legislation, official pronouncements and court decisions, which are often unclear, contradictory and subject to varying interpretation by different tax authorities, in particular recognition of income, expenses and other items of the financial statements under IFRS. Taxes are subject to review and investigation by various levels of authorities, which have the authority to impose severe fines and interest charges. A tax year generally remains open for review by the tax authorities for five subsequent calendar years; however, under certain circumstances a tax year may remain open longer.

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

(in millions of Kazakhstani tenge unless otherwise stated)

31. FINANCIAL ASSETS AND LIABILITIES: FAIR VALUES AND ACCOUNTING CLASSIFICATIONS

(a) Accounting classifications and fair values

The table below sets out the carrying amounts and fair values of financial assets and financial liabilities as at 31 December 2021:

	Financial instruments at fair value through profit or loss	Financial instruments at fair value through other comprehensive income	Amortised cost	Total carrying amount	Fair value
Cash and cash equivalents	-	-	260,602	260,602	260,602
Investment financial assets at FVOCI	-	459,078	-	459,078	459,078
Investment financial assets at amortised cost	-	-	10,380	10,380	10,374
Due from banks	-	-	6,570	6,570	6,570
Loans to customers and banks	-	-	1,177,333	1,177,333	1,168,758
Other financial assets	-	-	28,421	28,421	28,421
	-	**459,078**	**1,483,306**	**1,942,384**	**1,933,803**
Due to banks and financial institutions	-	-	55,371	55,371	55,371
Customer accounts	-	-	1,355,708	1,355,708	1,355,254
Debt securities issued	-	-	108,652	108,652	99,504
Subordinated bonds	-	-	64,004	64,004	61,458
Other financial liabilities	-	-	323,542	323,542	323,542
	-	**-**	**1,907,277**	**1,907,277**	**1,895,129**

(in millions of Kazakhstani tenge unless otherwise stated)

31. FINANCIAL ASSETS AND LIABILITIES: FAIR VALUES AND ACCOUNTING CLASSIFICATIONS, CONTINUED

(a) Accounting classifications and fair values, continued

The table below sets out the carrying amounts and fair values of financial assets and financial liabilities as at 31 December 2020:

	Financial instruments at fair value through profit or loss	Financial instruments at fair value through other comprehensive income	Amortised cost	Total carrying amount	Fair value
Cash and cash equivalents	-	-	278,742	278,742	278,742
Investment financial assets at FVOCI	-	296,095	-	296,095	296,095
Investment financial assets at amortised cost	-	-	10,257	10,257	10,521
Due from banks	-	-	63,426	63,426	63,426
Loans to customers and banks	-	-	1,053,014	1,053,014	1,046,280
Other financial assets	-	-	18,504	18,504	18,504
	-	**296,095**	**1,423,943**	**1,720,038**	**1,713,568**
Due to banks and financial institutions	-	-	116,915	116,915	116,915
Customer accounts	-	-	1,189,577	1,189,577	1,192,558
Debt securities issued	-	-	110,326	110,326	99,207
Subordinated bonds	-	-	62,654	62,654	56,220
Other financial liabilities	-	-	223,562	223,562	223,562
	-	**-**	**1,703,034**	**1,703,034**	**1,688,462**

31. FINANCIAL ASSETS AND LIABILITIES: FAIR VALUES AND ACCOUNTING CLASSIFICATIONS, CONTINUED

(a) Accounting classifications and fair values, continued

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 judgement, the fair value should not be interpreted as being realisable in an immediate sale of the assets or settlement of liabilities.

Fair values of financial assets and financial liabilities that are traded in active markets are based on quoted market prices or dealer price quotations. For all other financial instruments the Bank determines fair values using other valuation techniques.

The objective of valuation techniques is to arrive at a fair value measurement that reflects the price that would be received to sell the asset or paid to transfer the liability in an orderly transaction between market participants at the measurement date.

Valuation techniques include net present value and discounted cash flow models, comparison to similar instruments for which market-observable prices exist. Assumptions and inputs used in valuation techniques include risk-free and benchmark interest rates, credit spreads and other premia used in estimating discount rates, bond and equity prices and foreign currency exchange rates. The objective of valuation techniques is to arrive at a fair value determination that reflects the price of the financial instrument at the reporting date that would have been determined by market participants acting at arm's length.

The Bank uses widely recognised valuation models for determining the fair value of common and more simple financial instruments, like interest rate and currency swaps that use only observable market data and require little management judgment and estimation. Observable prices and model inputs are usually available in the market for listed debt and equity securities, exchange traded derivatives and simple over the counter derivatives like interest rate swaps.

For more complex instruments, the Bank uses proprietary valuation models. Some or all of the significant inputs into these models may not be observable in the market, and are derived from market prices or rates or are estimated based on assumptions. Example of instruments involving significant unobservable inputs include certain loans and securities for which there is no active market.

The following assumptions are used by management to estimate the fair values of financial instruments:

- discount rates of 5.07 – 13.53% and 17.95 - 21.17% are used for discounting future cash flows from loans to corporate customers and loans to retail customers, respectively (2020: 5.6 – 12.5% and 18.4%);
- discount rates of 0.4 – 7.4% and 0.8 – 8.0% are used to calculate expected future cash flows from current accounts and deposits of corporate and retail customers, respectively (2020: 0.4 – 7.3% and 1.0 – 9.2%);
- quoted market prices are used for determination of fair value of debt securities issued.

The estimates of fair value are intended to approximate the amount for which a financial instrument can be exchanged between knowledgeable, willing parties in an arm's length transaction. 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 settlement of liabilities.

(b) Fair value hierarchy

The Bank measures fair values for financial instruments recorded on the separate statement of financial position using the following fair value hierarchy that 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: Valuation techniques based on observable inputs, 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 identical or 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.

(in millions of Kazakhstani tenge unless otherwise stated)

31. FINANCIAL ASSETS AND LIABILITIES: FAIR VALUES AND ACCOUNTING CLASSIFICATIONS, CONTINUED

(b) Fair value hierarchy, continued

- Level 3: valuation techniques using unobservable inputs. 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 valuations. This category includes instruments that are valued based on quoted prices for similar instruments where significant unobservable adjustments or assumptions are required to reflect difference between the instruments.

The table below analyses financial instruments measured at fair value at 31 December 2021, by the level in the fair value hierarchy into which the fair value measurement is categorised.

	Level 1	Level 2	Total
Investment financial assets at FVOCI - debt financial instruments	28,416	430,662	459,078
	28,416	**430,662**	**459,078**

The table below analyses financial instruments measured at fair value at 31 December 2020, by the level in the fair value hierarchy into which the fair value measurement is categorised.

	Level 1	Level 2	Total
Investment financial assets at FVOCI - debt financial instruments	33,842	262,253	296,095
	33,842	**262,253**	**296,095**

Unobservable valuation differences on initial recognition

In many cases all significant inputs into the valuation techniques are wholly observable, for example by reference to information from similar transactions in the currency market. In cases where all inputs are not /observable, for example because there are no observable trades in a similar risk at the reporting date, the Bank uses valuation techniques that rely on unobservable inputs – e.g. volatilities of certain underlying, expectations of termination periods. When fair value at initial recognition is not evidenced by a quoted price in an active market or based on a valuation technique that uses data only from observable markets, any difference between the fair value at initial recognition and the transaction price is not recognised in profit or loss immediately, but is deferred (see note 3).

Although the Bank believes that its estimates of fair value are appropriate, the use of different methodologies or assumptions could lead to different measurements of fair value.

The following table analyses the fair value of financial instruments not measured at fair value, by the level in the fair value hierarchy into which each fair value measurement is categorised as at 31 December 2021:

	Level 2	Level 3	Total fair values	Total carrying amount
Assets				
Cash and cash equivalents	260,602	-	260,602	260,602
Due from banks	6,570	-	6,570	6,570
Loans to customers and banks	1,100,161	68,597	1,168,758	1,177,333
Other financial assets	28,421	-	-	28,421
Liabilities				
Customer accounts	55,371	-	55,371	55,371
Due to banks and financial institutions	1,355,254	-	1,355,254	1,355,708
Debt securities issued	99,504	-	99,504	108,652
Subordinated bonds	61,458	-	61,458	64,004
Other financial liabilities	323,542		323,542	323,542

(in millions of Kazakhstani tenge unless otherwise stated)

31. FINANCIAL ASSETS AND LIABILITIES: FAIR VALUES AND ACCOUNTING CLASSIFICATIONS, CONTINUED

(b) Fair value hierarchy, continued

Unobservable valuation differences on initial recognition, continued

The following table analyses the fair value of financial instruments not measured at fair value, by the level in the fair value hierarchy into which each fair value measurement is categorised as at 31 December 2020:

	Level 2	Level 3	Total fair values	Total carrying amount
Assets				
Cash and cash equivalents	278,742	-	278,742	278,742
Due from banks	63,426	-	63,426	63,426
Loans to customers and banks	885,851	160,429	1,046,280	1,053,014
Other financial assets	18,504	-	18,504	18,504
Liabilities				
Customer accounts	116,915	-	116,915	116,915
Due to banks and financial institutions	1,192,558	-	1,192,558	1,189,577
Debt securities issued	99,207	-	99,207	110,326
Subordinated bonds	56,220	-	56,220	62,654
Other financial liabilities	223,562	-	223,562	223,562

32. RELATED PARTY TRANSACTIONS

In considering each possible related party relationship, attention is directed to the substance of the relationship, and not merely the legal form. Transactions between the Bank and its subsidiaries, which are related parties of the Bank are disclosed in this note. Details of transactions between the Bank and other related parties are disclosed below:

	31 December 2021		31 December 2020	
	Related party transactions	Average effective interest rate	Related party transactions	Average effective interest rate
Investments in subsidiaries	**52,307**		**39,138**	
- subsidiaries				
- in KZT	52,307		39,138	
Loans to customers and banks, gross	**99,927**		**112,605**	
- key management personnel of the Bank				
- in KZT	46	1.91%	60	4.10%
- close relatives of key management personnel				
- in KZT	120	4.52%	102	5.52%
- subsidiaries				
- in USD	2,344	3.56%	3,843	4.00%
- in KZT	73,882	0.82%	87,239	0.1%
- entities under common control				
- in USD	23,535	12.50%	21,361	7.24%
- in KZT				
Credit loss allowance for loans to customers and banks	**(14,278)**		**(28,065)**	
- close relatives of key management personnel				
- subsidiaries	(4,765)		(20,603)	
- entities under common control	(9,513)		(7,462)	

(in millions of Kazakhstani tenge unless otherwise stated)

32. RELATED PARTY TRANSACTIONS, CONTINUED

	31 December 2021		31 December 2020	
	Related party transactions	Average interest rate	Related party transactions	Average interest rate
Customer accounts	**13,841**		**7,841**	
- key management personnel of the Bank				
- in KZT	1,918	7.8%	1,078	1.95%
- in USD	714	1.95%	-	-
- in other currencies	157	-	-	-
- close relatives of key management personnel				
- in KZT	3,314	7.7%	-	-
- in USD	1,705	1.23%	2,315	1.20%
- in other currencies	10	1.21%	-	-
- subsidiaries				
- in KZT	1,183	5.31%	190	5.32%
- in USD	817	0.2%	123	0.2%
- other				
- EUR	30	4.98%	4,135	5.00%
- in KZT	3,150	7.4%	-	-
- in USD	800	2.5%		
- in other currencies	43	2.4%		
Debt securities issued	**2,565**		**1,832**	
- subsidiaries				
- in KZT	569	5.70%	569	5.70%
- shareholders				
- in USD	1,996	4.1%	1,263	4.5%
Subordinated bonds	**126**		**114**	
- subsidiaries				
- in KZT	126	10.7%	114	10.7%
Charter capital	**2,233**		**1,617**	
- subsidiaries				
- in KZT	2,233		1,617	

Secured and unsecured loans and guarantees are issued to key management personnel and other related parties in the ordinary course of business. These loans are issued mostly on the same terms, including interest rates, that are used in other similar transactions with the persons of similar status or, if applicable, with other employees. The transactions did not involve more than the normal risk of repayment or present other unfavourable features.

Amounts deposited by the Bank's key management personnel and other related parties earn interest at the same rates as those offered to the market or on the same terms and conditions applicable to other employees within the Bank.

Included in the separate statement of profit or loss for the years ended 31 December 2021 and 2020 are the following amounts, which arose due to transactions with related parties:

	For the year ended 31 December 2021	For the year ended 31 December 2020
Interest income	**537**	**103**
- key management personnel of the Bank	1	2
- close relatives of key management personnel	6	6
- subsidiaries	260	40
- entities under common control	270	55
Interest expense	**(515)**	**(187)**
- key management personnel of the Bank	(116)	(31)
- close relatives of key management personnel	(221)	(27)
- subsidiaries	(36)	-
- other	(142)	(129)
Allowance for expected credit losses on loans to customers and banks	**(2,100)**	**(21,275)**
- subsidiaries	(30)	(13,838)
- entities under common control	(2,070)	(7,437)
Operating expenses	**(607)**	**(492)**
- key management personnel of the Bank	(607)	(492)
Net foreign exchange gain	**1,650**	**1,946**
- entities under common control	1,650	1,946

32. RELATED PARTY TRANSACTIONS, CONTINUED

Key management personnel remuneration for the years ended 31 December 2021 and 2020 represent short-term employee benefits. Total remuneration of members of the Board of Directors and the Management Board amounted to KZT 607 million and KZT 492 million, for the years ended 31 December 2021 and 2020, respectively.

33. SUBSEQUENT EVENTS

On 2 January 2022 protests started in Western Kazakhstan related to an increase in the liquefied natural gas price from 60 tenge to 120 tenge per litre. These protests spread to other cities and resulted in looting and loss of life. On 5 January 2022 the government declared a state of emergency. As a result of the above protests and state of emergency the President of Kazakhstan has made certain public announcements regarding possible measures including additional taxes. On 19 January 2022 the state of emergency was lifted.

However, the broader effect of these events and their impact on Kazakhstan's economy, including any subsequent impact on the Bank's financial performance in 2022, cannot be determined as at the date of approval of these separate financial statements.

A military conflict of recent weeks in Ukraine, following the commencement of military operations by the Russian Federation, has further increased the level of economic uncertainties in Kazakhstan. Severe sanctions were imposed by the United States of America, the European Union and some other countries on the Russian government, as well as major financial institutions and certain other entities and individuals in the RF.

Liquidity risk

Based on the stress-tests performed under the negative scenario, the Bank has sufficient liquidity cushion to meet its obligations to the counterparties.

As at 31 December 2021, the Bank has balances with the Russian banks in the amount of KZT 4,573 million with regard to which there could be difficulties in getting funds back due to the sanctions imposed.

As at the date of these financial statements, the Bank has withdrawn cash in the amount of KZT 3,451 million from its accounts with the Russian banks included in the sanctions list.

Interest rate risk

Interest rate risk is managed by maintaining a well-balanced structure of assets and liabilities and a system of limits. Such policy limits the possible effect of changes in interest rates on the Bank's income and on the value of assets and liabilities that are sensitive to interest rate changes.

As at 31 December 2021, the Bank held investment securities of Russian issuers of KZT 28,309 million with maturities in 2022-2026. As at the date of issue of these separate financial statements investment securities were redeemed in the amount of KZT 2,716 million.

Currency risk

During the period after the reporting date and till the date of issue of the financial statements KZT was traded against USD within the range from KZT 431.67 to KZT 443.57 per one USD.

The Bank has assets and liabilities denominated in several foreign currencies. Devaluation of KZT against USD and other foreign currencies will result in revaluation of financial assets and liabilities. In case of 30% weakening of KZT against USD, the net effect on equity would be KZT (525) million (based on the Bank's exposure to currency risk as at 31 December 2021).