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**JOINT STOCK COMPANY
BANK CENTERCREDIT**

Separate Financial Statements
for the year ended 31 December 2019

Contents

Independent Auditors' Report

Separate Statement of Profit or Loss.....	9
Separate Statement of Comprehensive Income.....	10
Separate Statement of Financial Position.....	11
Separate Statement of Changes in Equity.....	12-13
Separate Statement of Cash Flows.....	14-15
Notes to the Separate Financial Statements.....	16-104



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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 2019, 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 2019, 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 Code of Ethics for Professional Accountants (including International Independence Standards) 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.

«КПМГ Аудит» ЖШС, Қазақстанда тіркелген жауапкершілігі шектеулі серіктестік, Швейцария заңнамасы бойынша тіркелген KPMG International Cooperative ("KPMG International") қауымдастығына кіретін KPMG тәуелсіз фирмалар желісінің мүшесі.

KPMG Audit LLC, a company incorporated under the Laws of the Republic of Kazakhstan, a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity.



Expected credit losses ('ECL') for loans to customers	
Please refer to Notes 3 (n) and 16 in the separate financial statements.	
The key audit matter	How the matter was addressed in our audit
<p>Loans to customers and banks represent 70% 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.</p> <p>The Bank applies ECL valuation models, which require management to apply professional judgement and to make assumptions related to the following key areas:</p> <ul style="list-style-type: none"> - 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. <p>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.</p>	<p>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.</p> <p>To analyse adequacy of professional judgement and assumptions made by the management in relation to allowance for ECL estimate, we performed the following procedures:</p> <ul style="list-style-type: none"> — 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 2019 with actual results for 2019.



	<p>We paid special attention to the results of Asset Quality Review (AQR) inspection performed by the National Bank of the Republic of Kazakhstan to ensure transparency of financial position of the second-tier banks. We analysed AQR results and assessed whether ECL allowance balances should be reassessed as a result of AQR inspection.</p> <p>We also assessed whether the separate financial statements disclosures appropriately reflect the Bank's exposure to credit risk.</p>
Going concern considerations related to the COVID-19 outbreak	
<p>Please refer to Notes 2 (d) and 33 in the separate financial statements.</p>	
<p>The key audit matter</p>	<p>How the matter was addressed in our audit</p>
<p>The Bank's separate financial statements are prepared on a going concern basis.</p> <p>The World Health Organization declared on 11 March 2020 the coronavirus (COVID-19) outbreak a pandemic. The Russian government authorities has taken a number of measures to counter the effects of the outbreak, including border closures, quarantine, severe limitations imposed on cross-border and domestic transportation, ban on social, cultural, leisure or sport events. As a result, the Bank was forced to temporarily transfer part of its personnel to working from home and adjust operating plans.</p> <p>The Bank's going concern assessment was based on cash flow forecasts which in management's view support the assertion that the Bank will have sufficient resources to continue in operational existence for the foreseeable future.</p> <p>As part of the assessment, management also considered a number of actions aimed at alleviating the potential disruption to the Bank's business and liquidity position.</p> <p>This assessment covers a number of scenarios specified in Note 2(d).</p>	<p>As part of our audit, we performed the following procedures:</p> <p>We obtained understanding of the Bank's business planning process and tested the design, implementation of its key internal controls over the assessment of the Bank's ability to continue as a going concern, including those over preparation of cash flow forecasts used in the assessment.</p> <p>We analysed management's assessment of the going concern basis of accounting, including their evaluation of business and liquidity risks arising from the COVID-19 outbreak, and plans for further actions in response to the risks identified. As part of the procedure we also made corroborating inquiries of the Chairman of the Management Board.</p> <p>We tested the reasonableness and feasibility of the plans for future actions in order to alleviate the effects of the outbreak by performing the following:</p> <ul style="list-style-type: none"> — Testing of key assumptions used to generate looking-forward financial information for different scenarios of situation development. In the first place we assessed changes in a loan portfolio and portfolio of customer accounts as at 31 March 2020 in accordance with our understanding of the Bank's operations, including their impact on the capital adequacy ratios; — Sensitivity analysis of the Bank's ability to continue as a going concern to changes in the above-mentioned key assumptions as well as analysis of existence of evidence of the management prejudice in forming this assessment. <p>We also considered whether any additional relevant facts or information have become available since the date on which the management made its assessment.</p> <p>We evaluated the adequacy of the Bank's disclosures in respect of the going concern assessment and any related uncertainties in the separate financial statements.</p>



The COVID-19 pandemic is an unprecedented challenge for the global economy, and at the date of the separate financial statements, its effects are subject to a significant degree of uncertainty. The Bank's use of the going concern basis of accounting is a key audit matter due to high level of management judgment required and inherent uncertainty involved in forecasting and evaluating financial impact of current economic environment and measures planned by the Bank.

Other Information

Management is responsible for the other information. The other information comprises the information included in the Annual Report of the Bank for 2019 but does not include the separate financial statements and our auditors' report thereon. The Annual Report of the Bank for 2019 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, related safeguards.



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. MΦ-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

4 May 2020

JOINT STOCK COMPANY BANK CENTERCREDIT

SEPARATE STATEMENT OF PROFIT OR LOSS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge)


	Note	Year ended 31 December 2019	Year ended 31 December 2018
Interest income calculated using the effective interest rate method		118,203	109,480
Other interest income		-	224
Interest expense		(61,837)	(65,506)
Net interest income before expected credit loss allowance on interest-bearing assets	5	56,366	44,198
Expected credit loss allowance on interest bearing assets	6	(42,537)	(30,814)
Net interest income		13,829	13,384
Fee and commission income	7	25,748	23,880
Fee and commission expense	7	(7,636)	(4,366)
Net fee and commission income		18,112	19,514
Net gain on financial instruments at fair value through profit or loss	8	701	3,640
Net gain on sale and repayment of financial assets measured at fair value through other comprehensive income		1,031	629
Net foreign exchange gain	9	5,216	3,121
Charge of allowance for expected credit losses on other financial assets		(1,265)	(1,323)
Recovery of provision for credit related commitments		16	32
Other income		284	2,163
Net non-interest income		24,095	27,776
Operating income		37,924	41,160
Operating expenses	10	(36,046)	(29,145)
Operating income before income tax		1,878	12,015
Income tax expense	11	(381)	(2,392)
Profit for the year		1,497	9,623

These separate financial statements as set out on pages 9 to 104 were approved by Management Board on 30 April 2020 and were signed on its behalf by:



G.A. Khussainov
Chairman of the Management Board

30 April 2020
Almaty, Kazakhstan



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

30 April 2020
Almaty, Kazakhstan



A.T. Nurgaliyeva
Chief Accountant

30 April 2020
Almaty, Kazakhstan

Explanatory notes as set out on pages 16 to 104 form an integral part of these separate financial statements

JOINT STOCK COMPANY BANK CENTERCREDIT

SEPARATE STATEMENT OF COMPREHENSIVE INCOME FOR THE YEAR ENDED 31 DECEMBER 2019
(in millions of Kazakhstani tenge)


	Year ended 31 December 2019	Year ended 31 December 2018
PROFIT FOR THE YEAR	1,497	9,623
OTHER COMPREHENSIVE INCOME		
<i>Items that are or may be reclassified subsequently to profit or loss:</i>		
Net gain/(loss) resulting on revaluation of available-for-sale investments during the period (net of tax – KZT nil)	5,024	(1,665)
Reclassification adjustment relating to investment securities disposed of during the period (net of tax – KZT Nil)	(1,031)	(629)
<i>Total items that are or may be reclassified subsequently to profit or loss</i>	<i>3,993</i>	<i>(2,294)</i>
OTHER COMPREHENSIVE INCOME/(LOSS) NET OF INCOME TAX	3,993	(2,294)
TOTAL COMPREHENSIVE INCOME FOR THE YEAR	5,490	7,329

These separate financial statements as set out on pages 9 to 104 were approved by Management Board on 30 April 2020 and were signed on its behalf by:



G.A. Khussainov
Chairman of the Management Board

30 April 2020
Almaty, Kazakhstan



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

30 April 2020
Almaty, Kazakhstan



A.T. Nurgaliyeva
Chief Accountant

30 April 2020
Almaty, Kazakhstan

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JOINT STOCK COMPANY BANK CENTERCREDIT

SEPARATE STATEMENT OF FINANCIAL POSITION AS AT 31 DECEMBER 2019


(in millions of Kazakhstani tenge)

	Note	31 December 2019	31 December 2018
ASSETS:			
Cash and cash equivalents	12	158,656	175,235
Financial instruments at fair value through profit or loss	31(b)	-	27,177
Investment securities	13	163,069	177,787
Due from banks	14	9,102	31,292
Investments in subsidiaries	15	25,374	23,251
Loans to customers and banks	16		
<i>Loans to corporate customers</i>		598,686	618,060
<i>Loans to retail customers</i>		427,685	393,153
Current income tax assets		2,703	1,206
Property, plant and equipment and intangible assets	17	35,555	32,709
Other assets	18	36,944	34,800
TOTAL ASSETS		1,457,774	1,514,670
LIABILITIES AND EQUITY			
LIABILITIES:			
Financial instruments at fair value through profit or loss	31(b)	-	12,668
Due to banks and financial institutions	19	108,195	121,823
Customer and bank accounts	20		
<i>Due to corporate customers</i>		414,774	494,272
<i>Due to retail customers</i>		544,463	583,807
Debt securities issued	21	83,987	70,585
Deferred income tax liabilities	11	8,981	8,403
Subordinated bonds	22	61,471	72,054
Other liabilities	23	121,957	43,556
TOTAL LIABILITIES		1,343,828	1,407,168
EQUITY:			
Share capital	24	59,124	58,170
Fair value reserve for securities		285	(3,708)
Property revaluation reserve		1,442	1,564
Retained earnings		53,095	51,476
Total equity		113,946	107,502
TOTAL LIABILITIES AND EQUITY		1,457,774	1,514,670


These separate financial statements as set out on pages 9 to 104 were approved by Management Board on 30 April 2020 and were signed on its behalf by:



G.A. Khussainov
Chairman of the Management Board



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



A.T. Nurgaliyeva
Chief Accountant

30 April 2020
Almaty, Kazakhstan

30 April 2020
Almaty, Kazakhstan

30 April 2020
Almaty, Kazakhstan

Explanatory notes as set out on pages 16 to 104 form an integral part of these separate financial statements.

JOINT STOCK COMPANY BANK CENTERCREDIT

SEPARATE STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2019
(in millions of Kazakhstani tenge)

	Share capital	Fair value reserve	Property revaluation reserve	Retained earnings	Total equity
Balance at 1 January 2018	69,856	(1,414)	4,444	38,973	111,859
Total comprehensive income					
Profit for the year	-	-	-	9,623	9,623
Other comprehensive income					
<i>Items that are or may be reclassified subsequently to profit or loss:</i>					
Net change in fair value	-	(2,294)	-	-	(2,294)
<i>Total items that are or may be reclassified subsequently to profit or loss</i>	-	(2,294)	-	-	(2,294)
Total other comprehensive income	-	(2,294)	-	-	(2,294)
Total comprehensive income for the year	-	(2,294)	-	9,623	7,329
Other movements in equity					
Transfer of the amount from revaluation resulting from depreciation and disposal	-	-	(2,880)	2,880	-
Total other movements in equity	-	-	(2,880)	2,880	-
Transactions with owners recorded directly in equity					
Treasury shares purchased	(11,686)	-	-	-	(11,686)
Total transactions with owners	(11,686)	-	-	-	(11,686)
31 December 2018	58,170	(3,708)	1,564	51,476	107,502

JOINT STOCK COMPANY BANK CENTERCREDIT

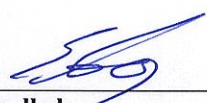
SEPARATE STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31 DECEMBER 2019
(in millions of Kazakhstani tenge)

	Share capital	Fair value reserve	Property revaluation reserve	Retained earnings	Total equity
Balance at 1 January 2019	58,170	(3,708)	1,564	51,476	107,502
Total comprehensive income					
Profit for the year	-	-	-	1,497	1,497
Other comprehensive income					
<i>Items that are or may be reclassified subsequently to profit or loss:</i>					
Net change in fair value	-	3,993	-	-	3,993
<i>Total items that are or may be reclassified subsequently to profit or loss</i>	-	3,993	-	-	3,993
Total other comprehensive income	-	3,993	-	-	3,993
Total comprehensive income for the year	-	3,993	-	1,497	5,490
Other movements in equity					
Transfer of the amount from revaluation resulting from depreciation and disposal	-	-	(122)	122	-
Total other movements in equity	-	-	(122)	122	-
Transactions with owners recorded directly in equity					
Treasury shares issued	954	-	-	-	954
Total transactions with owners	954	-	-	-	954
31 December 2019	59,124	285	1,442	53,095	113,946

These separate financial statements as set out on pages 9 to 104 were approved by Management Board on 30 April 2020 and were signed on its behalf by:




G.A. Khussainov
Chairman of the Management Board



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



A.T. Nurgaliyeva
Chief Accountant

30 April 2020
Almaty, Kazakhstan

30 April 2020
Almaty, Kazakhstan

30 April 2020
Almaty, Kazakhstan

Explanatory notes as set out on pages 16 to 104 form an integral part of these separate financial statements.

JOINT STOCK COMPANY BANK CENTERCREDIT

SEPARATE STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge)

	Year ended 31 December 2019	Year ended 31 December 2018
CASH FLOWS FROM OPERATING ACTIVITIES:		
Interest received	113,859	100,126
Interest paid	(61,764)	(62,091)
Services fee and commission received	25,748	23,880
Services fee and commission paid	(7,704)	(4,755)
Net payments on derivative instrument transactions	691	(840)
Net foreign exchange gain	5,588	5,993
Other income receipts	284	1,018
Operating expenses paid	(33,115)	(27,190)
Cash flow from operating activities before changes in operating assets and liabilities	43,587	36,141
Change in operating assets:		
Financial instruments at fair value through profit or loss	27,187	-
Due from banks	3,461	(18,199)
Loans to customers and banks	31,798	(144,017)
Other assets	(246)	28,218
Change in operating liabilities:		
Financial instruments at fair value through profit or loss	(12,668)	-
Due to banks and financial institutions	(10,677)	18,781
Customer and bank accounts	(117,835)	33,505
Other liabilities	6,199	(2,278)
Cash flows used in operating activities before tax	(29,194)	(47,849)
Income tax paid	(1,300)	(1,169)
Net cash flows used in operating activities	(30,494)	(49,018)
CASH FLOWS FROM INVESTING ACTIVITIES:		
Proceeds from repayment and sale of investment securities	646,633	535,422
Purchase of investment securities	(626,902)	(553,383)
Acquisition of property, plant and equipment and intangible assets	(5,892)	(4,151)
Proceeds from sale of property, plant and equipment	181	-
Acquisition of shares issued by subsidiary	(2,123)	(7,686)
Net cash flows used in investing activities	11,897	(29,798)

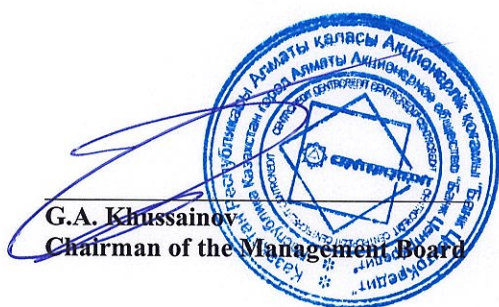
JOINT STOCK COMPANY BANK CENTERCREDIT

SEPARATE STATEMENT OF CASH FLOWS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge)

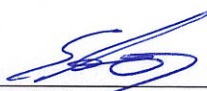
	Year ended 31 December 2019	Year ended 31 December 2018
CASH FLOWS FROM FINANCING ACTIVITIES:		
Proceeds on treasury shares issued/(repurchased), net	954	(11,686)
Proceeds on debt securities issued	34,701	54,230
Repurchase and repayment of debt securities issued	(21,701)	-
Receipts from subordinated bonds	400	5,507
Repayment of subordinated bonds	(11,879)	(6,000)
Net cash flows from financing activities	2,475	42,051
Effect of changes in foreign exchange rate fluctuations on cash and cash equivalents	(457)	24,087
NET DECREASE IN CASH AND CASH EQUIVALENTS	(16,579)	(12,678)
CASH AND CASH EQUIVALENTS, beginning of the year	175,235	187,913
CASH AND CASH EQUIVALENTS, end of the year (Note 12)	158,656	175,235

These separate financial statements as set out on pages 9 to 104 were approved by Management Board on 30 April 2020 and were signed on its behalf by:



G.A. Khussainov
Chairman of the Management Board

30 April 2020
Almaty, Kazakhstan



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

30 April 2020
Almaty, Kazakhstan



A.T. Nurgaliyeva
Chief Accountant

30 April 2020
Almaty, Kazakhstan

Explanatory notes as set out on pages 16 to 104 form an integral part of these separate financial statements.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

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 National Bank of the Republic of Kazakhstan (the “NBRK”) is a regulatory authority of the Bank. The Bank conducts its business under the license number 1.2.25/195/34, renewed on 28 January 2015.

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

As at 31 December 2019 and 31 December 2018, the Bank had 19 branches in the Republic of Kazakhstan.

As at 31 December 2019 and 2018, the number of ordinary shares was allocated as follows:

	31 December 2019 %	31 December 2018 %
B.R. Baiseitov	47.93	48.07
V.S. Lee	10.40	10.05
D.R. Amankulov	5.90	5.98
Other (individually hold less than 5%)	35.77	35.90
	<u>100.00</u>	<u>100.00</u>

During 2019, as part of the additional capitalisation, the Bank placed 3,181,111 ordinary shares for the amount of KZT 954,333,300.

The separate financial statements were authorised for issue by the Management Board of JSC Bank CenterCredit on 30 April 2020.

(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. In addition, the first months of 2020 have seen significant global market turmoil triggered by the outbreak of the COVID-19 (*Note 33*). Together with other factors, this has resulted in a sharp decrease in the oil price and the stock market indices, as well as a continuing depreciation of the Kazakhstan Tenge. These developments are further increasing the level of uncertainty in the Kazakhstan business environment.

The separate financial statements reflect the management's assessment of the impact of the Republic of 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 2019 in accordance with IFRS that can be obtained from the Bank's registered office.

2. BASIS OF PREPARATION, CONTINUED

(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) Assessment of the Bank's ability to continue as a going concern

The accompanying separate financial statements have been prepared on assumption that the Bank will continue as a going concern.

In March 2020, coronavirus infection COVID-19 was declared a pandemic. Many countries worldwide have taken measures to limit cross-border traffic and in some cases to close the borders and declared quarantine as response measures to curb and reduce spreading of the virus.

On 15 March 2020 the Government of the Republic of Kazakhstan declared a state of emergency, which was subsequently extended until 30 April 2020 in response to global COVID-19 pandemic. To reduce spreading of virus a number of restrictive measures on movement of people within Kazakhstan has been introduced, which resulted in slowdown of normal economic activity of many enterprises in the country. Governments of other countries worldwide have introduced similar restrictions in order to limit the impact of virus, which caused significant weakening of global economic activity.

State of emergency and quarantine were introduced, first of all, in the largest cities – Almaty and Nur-Sultan, with subsequent introduction of this regime throughout Kazakhstan. The bodies of executive power have introduced measures to restrict movement and contacts of the people by means of temporary suspension of work of educational institutions, shopping centres, places of public catering, cinemas, sport facilities as well as industrial enterprises, construction facilities, financial market entities, etc. These events have certain impact on the country's economy in general, which may result in its slowdown in mid-term.

Under the current economic situation, the Government of the Republic of Kazakhstan is taking a number of supporting measures to stimulate business activity in the country and growth of consumption:

- as part of the “Economy of simple things” financing programme and a new government programme to support businesses that have suffered from introduction of quarantine, KZT 1 trillion was allocated to provide preferential lending of the economy at the interest rate of 8%;
- tax reliefs have been introduced as well as limitations on inspection of small and medium-sized businesses;
- social payments of KZT 42,500 were made to individuals who lost their jobs, including self-employed people and socially vulnerable groups of population;
- measures have been provided for to grant deferrals in payments to both individuals and economic entities, whose activity was affected by COVID-19 pandemic.

In accordance with the Resolution of the Management Board of the NBRK dated 19 March 2020, No.39, the Program of Preferential Lending was approved, which stipulates measures of support to small and medium-sized businesses and individual entrepreneurs that have been affected by introduction of the state of emergency in the country as a result of spreading a coronavirus infection. To grant loans through the operator - KSF JSC, the NBRK has allocated KZT 600,000 million, of which KZT 71,000 million represent a limit for the Bank. Business support mechanism is implemented through granting the concessional loans for replenishment of working capital for a term of up to 12 months.

2. BASIS OF PREPARATION, CONTINUED

(d) Assessment of the Bank's ability to continue as a going concern, continued

Taking into account the current situation in the economy and within the Bank, as well as expected negative implications of COVID-19 spreading, the Bank has analysed its financial positions under the following scenarios:

- Scenario No.1 implies decrease of an average annual price of BRENT oil up to USD 30 per barrel by the end of 2020; while exchange rate of the national currency to USD will be KZT 450 per USD 1; GDP growth rate - 0.4%, and inflation rate - 8.3% by the end of 2020;
- Scenario No.2 implies decrease of an average annual price of BRENT oil up to USD 20 per barrel by the end of 2020; while exchange rate of the national currency to USD will be KZT 475 per USD 1; GDP growth rate will be - 0.6%, and inflation rate will be 10.4% by the end of 2020;
- Scenario No.3 implies decrease of an average annual price of BRENT oil up to USD 10 per barrel by the end of 2020; while exchange rate of the national currency to USD will be KZT 500 per USD 1; GDP growth rate will be - 2.3%, and inflation rate will be 13.2% by the end of 2020.

Based on the calculations made under the above-mentioned scenarios, the Bank management has concluded that a range of possible outcomes in case of negative developments, which have been analysed to form this judgment, does not indicate that a material uncertainty exists that may cast significant doubt on the Bank's ability to continue as a going concern.

Asset Quality Review (AQR)

During 2019 the NBRK performed the Asset Quality Review (AQR) of the banking sector of the Republic of Kazakhstan. AQR was performed across 14 largest second-tier banks, which account for 87% of the total assets of the banking sector.

To ensure transparency and objectivity of the review, the NBRK carried out AQR jointly with an international consultant and independent audit firms. AQR was carried out in accordance with the methodology of the European Central Bank and in compliance with requirements of the legalisation of the Republic of Kazakhstan related to accounting and prudential regulation.

Based on AQR results, the Bank presented a report, which comprised comments and recommendations on improvement of business processes, on the basis of which a detailed action plan was prepared.

Based on AQR results, as part of the Program of Strengthening Financial Stability of Banking Sector of the Republic of Kazakhstan, an additional instrument was introduced to protect assets, which provides for a five-year state guarantee.

Moreover, before the end of May 2020 the Bank's shareholders will provide additional capitalisation in the amount of KZT 4,312 million. According to results of the general meeting of shareholders held on 31 March 2020, a decision was made to increase a number of authorised shares by means of additional issue of 215,263,858 ordinary shares.

(e) 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.

2. BASIS OF PREPARATION, CONTINUED**(e) Use of estimates and judgments, continued****Judgements**

Information about judgements made in applying accounting policies that have the most significant effects on the amounts recognised in the Bank's 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 2019 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 and banks – Note 16;
- Estimates of fair value of financial assets and liabilities – Note 31
- Estimates of fair value of subordinated bonds issued – Note 22.

(f) Changes in accounting policies and presentation**IFRS 16**

The Bank has initially applied IFRS 16 Leases from 1 January 2019.

The Bank adopted IFRS 16 applying the modified retrospective approach. Accordingly, the comparative information presented for 2018 is not restated – i.e. it is presented, as previously reported, under IAS 17 and related interpretations. Additionally, the disclosure requirements in IFRS 16 have not generally been applied to comparative information.

Detailed information on the accounting policy in accordance with IFRS 16 and IAS 17 is provided in Note 3(q).

(g) Comparative information

Comparative information is adjusted to conform to changes in presentation of the separate financial statements in the year ended 31 December 2019.

The following reclassifications were made in the separate statement of cash flows for the year ended 31 December 2018 to conform to changes in presentation in 2019:

	As previously reported	Effect of reclassification	As reclassified
<i>Separate Statement of Cash Flows</i>			
CASH FLOWS FROM OPERATING ACTIVITIES:			
Interest received	95,326	4,800	100,126
Cash flow from operating activities before changes in operating assets and liabilities	31,341	4,800	36,141
Net cash flows used in operating activities	(53,818)	4,800	(49,018)
CASH FLOWS FROM INVESTING ACTIVITIES:			
Proceeds from repayment and sale of investment securities	540,222	(4,800)	535,422
Net cash flows used in investing activities	(24,998)	(4,800)	(29,798)

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

2. BASIS OF PREPARATION, CONTINUED

(g) Comparative information, continued

While preparing the separate financial statements of the Bank for the year ended 31 December 2019, management restated gross carrying amount and unwinding of discount in relation to present value of expected credit losses on loans to customers and banks. Comparative information was revised and the effects on the corresponding figures may be as follows:

	As previously reported	Effect of adjustment	As restated
Loans to customers	981,175	-	981,175
Interest accrued	53,556	11,508	65,064
	1,034,731	11,508	1,046,239
Less: loss allowance	(121,658)	(11,508)	(133,166)
Total loans to consumers	913,073	-	913,073
	As previously reported	Effect of adjustment	As restated
Loans to corporate customers			
Corporate loans	523,607	7,979	531,586
Impairment allowance	(87,461)	(7,979)	(95,440)
Small and medium-sized enterprises	124,651	781	125,432
Impairment allowance	(9,971)	(781)	(10,752)
Loans to individuals			
Mortgage loans	154,453	1,219	155,672
Impairment allowance	(7,305)	(1,219)	(8,524)
Consumer loans	130,489	395	130,884
Impairment allowance	(8,794)	(395)	(9,189)
Business development	95,115	785	95,900
Impairment allowance	(8,010)	(785)	(8,795)
Auto loans	6,416	349	6,765
Impairment allowance	(117)	(349)	(466)
	913,073	-	913,073

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

2. BASIS OF PREPARATION, CONTINUED

(g) Comparative information, continued

Analysis by credit quality of loans to customers and banks outstanding as at 31 December 2018:

	As previously reported	Effect of adjustment	As restated
Loans to customers			
Corporate loans			
Not overdue	378,391	2,193	380,584
Overdue:			
overdue less than 30 days	67,792	3,051	70,843
overdue 31-60 days	29,482	933	30,415
overdue 61-90 days	16,379	208	16,587
overdue 91-180 days	11,448	130	11,578
overdue more than 180 days	20,115	1,464	21,579
Gross loans to corporate customers	523,607	7,979	531,586
Allowance for expected credit losses	(87,461)	(7,979)	(95,440)
Total loans to corporate customers net of allowance for expected credit losses	436,146	-	436,146
Small and medium-sized enterprises			
Not overdue	97,943	156	98,099
Overdue:			
overdue less than 30 days	7,654	152	7,806
overdue 31-60 days	163	38	201
overdue 61-90 days	1,542	53	1,595
overdue 91-180 days	7,181	133	7,314
overdue more than 180 days	10,168	249	10,417
Gross loans to customers	124,651	781	125,432
Allowance for expected credit losses	(9,971)	(781)	(10,752)
Total loans to customers net of allowance for expected credit losses	114,680	-	114,680
Mortgage loans			
Not overdue	122,250	220	122,470
Overdue:			
overdue less than 30 days	13,150	147	13,297
overdue 31-60 days	2,063	67	2,130
overdue 61-90 days	2,860	32	2,892
overdue 91-180 days	1,473	97	1,570
overdue more than 180 days	12,657	656	13,313
Gross loans to customers	154,453	1,219	155,672
Allowance for expected credit losses	(7,305)	(1,219)	(8,524)
Total loans to customers net of allowance for expected credit losses	147,148	-	147,148

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

2. BASIS OF PREPARATION, CONTINUED

(g) Comparative information, continued

Analysis by credit quality of loans to customers and banks outstanding as at 31 December 2018:

	As previously reported	Effect of adjustment	As restated
Loans to customers			
Consumer loans			
Not overdue	95,701	52	95,753
Overdue:			
overdue less than 30 days	9,944	53	9,997
overdue 31-60 days	1,551	8	1,559
overdue 61-90 days	5,488	5	5,493
overdue 91-180 days	1,222	100	1,322
overdue more than 180 days	16,583	177	16,760
Gross loans to customers	130,489	395	130,884
Allowance for expected credit losses	(8,794)	(395)	(9,189)
Total loans to customers net of allowance for expected credit losses	121,695	-	121,695
Business development			
Not overdue	67,730	133	67,863
Overdue:			
overdue less than 30 days	6,407	96	6,503
overdue 31-60 days	498	29	527
overdue 61-90 days	659	22	681
overdue 91-180 days	4,191	71	4,262
overdue more than 180 days	15,630	434	16,064
Gross loans to customers	95,115	785	95,900
Allowance for expected credit losses	(8,010)	(785)	(8,795)
Total loans to customers net of allowance for expected credit losses	87,105	-	87,105
Auto loans			
Not overdue	6,028	53	6,081
Overdue:			
overdue less than 30 days	72	15	87
overdue 31-60 days	8	29	37
overdue 61-90 days	32	8	40
overdue 91-180 days	15	29	44
overdue more than 180 days	261	215	476
Gross loans to customers	6,416	349	6,765
Allowance for expected credit losses	(117)	(349)	(466)
Total loans to customers net of allowance for expected credit losses	6,299	-	6,299

3. SIGNIFICANT ACCOUNTING POLICIES

The accounting policies set out below are applied consistently to all periods presented in these separate financial statements, and are applied consistently by the Bank, except as explained in Note 2(e), which addresses changes in accounting policies.

(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 in the separate financial statements of the Bank.

(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 versus 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.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(b) Interest income and expense, continued

Presentation

Interest income calculated using the effective interest method presented in the separate statement of profit or loss and other comprehensive income 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 and other comprehensive income 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.

(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.

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

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 respective 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 retranslated 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.

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED**(d) Foreign currency, continued***Foreign currency transactions, continued*

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

	<u>31 December 2019</u>	<u>31 December 2018</u>
KZT/EUR	429	439.37
KZT/USD	382.59	384.20

(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, FVOCI or FVTPL.

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

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

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

- the asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets; and
- the contractual terms of the financial asset give rise on specified dates to cash flows that are 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 income calculated using the effective interest method;
- ECL and reversals; and
- foreign exchange gains and losses.

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

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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(f) Financial instruments, continued

(i) *Classification, continued*

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.

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;

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(f) Financial instruments, continued

(i) Classification, continued

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

- 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 SPPI criterion if the prepayment amount substantially represents unpaid amounts of principal and interest on the principal amount outstanding, which may include reasonable 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 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.

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 agreement entitles the Bank to do so.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(f) Financial instruments, continued

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

Financial assets, continued

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 performs a quantitative and qualitative evaluation of whether the modification is substantial considering qualitative factors, quantitative factors and combined effect of qualitative and quantitative factors. The Bank concludes that the modification is substantial as a result of the following qualitative factors:

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

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

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 Mortgage organisation Baspana" JSC (Note 16).

When the Bank continues to recognise at asset to the extent of its continuing involvement, the Bank also recognises an associated liability. The transferred asset and the associated liability are measured on a basis that reflects the rights and obligations that the Bank has retained. The associated liability is measured in such a way that the net carrying amount of the transferred asset and the associated liability is the amortised cost of the rights and obligations 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(f) Financial instruments, continued

(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.

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 deposits and balances from banks or current accounts and deposits from customers, as appropriate. 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 banks or loans to customers, as appropriate. 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) Loans to customers

'Loans to customers' caption in the separate statement of financial position include:

- 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(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.

Investment securities were initially measured at fair value plus, in the case of investment securities not at FVTPL, incremental direct transaction costs, and subsequently accounted for depending on their classification as either held-to-maturity, FVTPL or available-for-sale.

(i) Property, plant and equipment and intangible assets

(i) Owned assets

Items of property, plant 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 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 a building 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 a building 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 licences are capitalised on the basis of the costs incurred to acquire and bring to use the specific software.

(iii) Depreciation

Depreciation is charged to profit or loss on a straight-line basis over the estimated useful lives of the individual assets. Items of property, plant and equipment are depreciated from the date that they are acquired, or in respect of internally constructed assets, from the date that the 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 computers	6.50-20.00%
Intangible assets	6.70-100.00%

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(j) Deposits, debt securities issued and subordinated bonds

Deposits, debt securities issued, and subordinated bonds are initially measured at fair value minus incremental direct transaction costs, and subsequently 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; and
- 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).

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

12-month expected credit losses (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 a 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(k) Impairment, continued

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 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;
- restructuring of a loan or advance on terms that the Bank would not consider otherwise;
- it is 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 was renegotiated due to a deterioration in the borrower's condition was usually considered to be impaired unless there was evidence that the risk of not receiving contractual cash flows had reduced significantly and there were no other indicators of impairment. In addition, loans that are overdue for 90 days or more are considered credit-impaired.

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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(k) Impairment, continued

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 (loan issued)*: 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.

(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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(n) Share capital

(i) *Ordinary shares*

Ordinary shares are classified as equity. Incremental costs directly attributable to the issue of the 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 Kazakhstan 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:

- 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.

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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(o) Taxation, continued

Deferred tax, continued

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 same 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.

(q) Leases

Policy applicable from 1 January 2019

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.

This policy is applied to contracts entered into, on or after 1 January 2019.

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, if appropriate, to reflect the terms of the lease and type of the asset leased.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(q) Leases, continued

Policy applicable from 1 January 2019, continued

As a lessee, continued

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.

The Bank used a number of practical expedients when applying IFRS 16 to leases previously classified as operating leases under IAS 17. In particular, the Bank:

- did not recognise right-of-use assets and liabilities for leases for which the lease term is less than 12 months;
- excluded initial direct costs from the measurement of the right-of-use asset at the date of initial application.

The impact on transition to IFRS 16 was immaterial. The adoption of IFRS 16 had no material impact on the Bank's separate financial statements as at 31 December 2019.

Policy applicable before 1 January 2019

For contracts entered into before 1 January 2019, the Bank determined whether the arrangement was or contained a lease based on the assessment of whether:

- fulfilment of the arrangement was dependent on the use of a specific asset or assets; and
- the arrangement had conveyed a right to use the asset.

An arrangement conveyed the right to use the asset if one of the following was met:

- the purchaser had the ability or right to operate the asset while obtaining or controlling more than an insignificant amount of the output;
- the purchaser had the ability or right to control physical access to the asset while obtaining or controlling more than an insignificant amount of the output; or
- facts and circumstances indicated that it was remote that other parties would take more than an insignificant amount of the output, and the price per unit was neither fixed per unit of output nor equal to the current market price per unit of output.

Assets held under other leases were classified as operating leases and were not recognised in the Bank's separate statement of financial position. Payments made under operating leases were recognised in profit or loss on a straight-line basis over the term of the lease. Lease incentives received were recognised as an integral part of the total lease expense, over the term of the lease.

(r) New standards and interpretations not yet adopted

A number of new standards are effective for annual periods beginning after 1 January 2019 and earlier application is permitted; however, the Bank has not early adopted the new or amended standards in preparing these financial statements.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

3. SIGNIFICANT ACCOUNTING POLICIES, CONTINUED

(r) New standards and interpretations not yet adopted, continued

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

- *Amendments to References to Conceptual Framework in IFRS Standards.*
- *Definition of a Business (Amendments to IFRS 3).*
- *Definition of Material (Amendments to IAS 1 and IAS 8).*
- *IFRS 17 Insurance Contracts.*

4. FINANCIAL RISK REVIEW

This note presents information about the Bank's exposure to financial risks. For information on the Bank's financial risk management framework, see Note 26 to the Bank's separate financial statements for the year ended 31 December 2019.

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.

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 grades 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 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Significant increase in credit risk, continued

Credit risk grades, continued

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)
<ul style="list-style-type: none">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.Data from credit reference agencies, press articles, changes in external credit ratings.Quoted bond and credit default swap (CDS) prices for the issuer where available.Actual and expected significant changes in the political, regulatory and technological environment of the borrower or in its business activities.	<ul style="list-style-type: none">Payment record – this includes overdue status as well as a range of variables about payment ratios.Utilisation of the granted limit.Requests for and granting of forbearance.Existing and forecast changes in business, financial and economic conditions.

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 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.

Determining whether credit risk has increased significantly

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.

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 judgement and relevant historical experience.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

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, continued

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 loan is recognised and allocated to Stage 1 (assuming it is not credit-impaired at that time).

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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Significant increase in credit risk, continued

Modified financial assets, continued

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.

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.

Generally, 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 estimated 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 analysing historical data for the last 5 years.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

4. FINANCIAL RISK REVIEW, CONTINUED

Credit risk - Amounts arising from ECL, continued

Significant increase in credit risk, continued

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.

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 economic conditions 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 lending 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 are 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

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

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.

	Carrying amount at 31 December 2019	External benchmarks used	
		PD	LGD
Cash and cash equivalents	158,656		70%;
Due from banks	9,102	Moody's default study	0% - if the Government of the Republic of Kazakhstan acts as a counterparty
Investment securities	163,069	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

Credit quality analysis

The following table sets out information about the credit quality of financial assets measured at amortised cost, FVOCI investment securities as at 31 December 2019. 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 2019			Total
	Stage 1 12-month expected credit losses (ECL)	Stage 2 Lifetime ECL for assets not credit-impaired	Stage 3 Lifetime ECL for credit- impaired assets	
<i>Cash and cash equivalents</i>				
- rated from AA- to AA+	7,822	-	-	7,822
- rated from A- to A+	25,373	-	-	25,373
- rated from BBB- to BBB+	49,885	-	-	49,885
- rated from BB- to BB+	3,929	-	-	3,929
- rated from B- to B+	5,836	-	-	5,836
- not rated	518	-	-	518
	93,363	-	-	93,363
Loss allowance	(155)	-	-	(155)
Total cash and cash equivalents (less cash on hand)	93,208	-	-	93,208

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

4. FINANCIAL RISK REVIEW, CONTINUED

Credit quality analysis, continued

	31 December 2019			Total
	Stage 1 12-month expected credit losses (ECL)	Stage 2 Lifetime ECL for assets not credit-impaired	Stage 3 Lifetime ECL for credit- impaired assets	
<i>Investment securities measured at amortised cost</i>				
- rated from BBB- to BBB+	2,529	-	-	2,529
	2,529	-	-	2,529
Loss allowance	-	-	-	-
Total investment securities measured at amortised cost	2,529	-	-	2,529
<i>Investment securities at fair value through other comprehensive income - FVOCI</i>				
- rated from AA- to AA+	9,760	-	-	9,760
- rated from BBB- to BBB+	124,087	-	-	124,087
- rated from BB- to BB+	26,330	-	-	26,330
Total investment securities at fair value through other comprehensive income	160,177	-	-	160,177
Loss allowance	(146)	-	-	(146)
Total carrying amount of investment securities measured at fair value through other comprehensive income	159,973	-	-	159,973
<i>Due from banks</i>				
- rated from AA- to AA+	3,126	-	-	3,126
- rated from BBB- to BBB+	5,934	-	-	5,934
- not rated	50	-	-	50
	9,110	-	-	9,110
Loss allowance	(8)	-	-	(8)
Total due from banks	9,102	-	-	9,102

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

4. FINANCIAL RISK REVIEW, CONTINUED

Credit quality analysis, continued

	31 December 2019				
	Stage 1 12-month expected credit losses (ECL)	Stage 2 Lifetime ECL for assets not credit- impaired	Stage 3 Lifetime ECL for credit- impaired assets	Originated credit- impaired financial assets (or POCI- assets)	Total
<i>Loans to corporate customers measured at amortised cost</i>					
Not overdue loans	325,255	72,960	169,598	1,712	569,525
Overdue loans:					
- overdue less than 30 days	1,853	476	14,915	301	17,545
- overdue 31-60 days	-	3,642	3,071	-	6,713
- overdue 61-90 days	-	52	3,701	-	3,753
- overdue 91-180 days	-	-	2,119	-	2,119
- overdue more than 180 days	-	-	29,743	-	29,743
	327,108	77,130	223,147	2,013	629,398
Loss allowance	(1,084)	(2,667)	(80,771)	-	(84,522)
Total loans to corporate customers measured at amortised cost	326,024	74,463	142,376	2,013	544,876
<i>Loans to individuals measured at amortised cost</i>					
Not overdue loans	240,220	28,647	6,462	-	275,329
Overdue loans:					
- overdue less than 30 days	7,029	2,285	2,079	-	11,393
- overdue 31-60 days	-	3,050	543	-	3,593
- overdue 61-90 days	-	2,300	552	-	2,852
- overdue 91-180 days	-	-	5,230	-	5,230
- overdue more than 180 days	-	-	51,439	-	51,439
	247,249	36,282	66,305	-	349,836
Loss allowance	(1,961)	(1,286)	(21,985)	-	(25,232)
Total loans to individuals measured at amortised cost	245,288	34,996	44,320	-	324,604
<i>Loans under reverse repo agreements</i>					
Reverse repo agreements	53,051	-	-	-	53,051
Loss allowance	-	-	-	-	-
Total loans under reverse repo agreements	53,051	-	-	-	53,051

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

4. FINANCIAL RISK REVIEW, CONTINUED

Credit quality analysis, continued

	31 December 2018			Total
	Stage 1 12-month expected credit losses (ECL)	Stage 2 Lifetime ECL for assets not credit-impaired	Stage 3 Lifetime ECL for credit- impaired assets	
<i>Cash and cash equivalents</i>				
- rated from AA- to AA+	2,577	-	-	2,577
- rated from A- to A+	9,853	-	-	9,853
- rated from BBB- to BBB+	100,641	-	-	100,641
- rated from BB- to BB+	5,733	-	-	5,733
- rated from B- to B+	4,285	-	-	4,285
- not rated	302	-	-	302
	123,391	-	-	123,391
Loss allowance	(73)	-	-	(73)
Total cash and cash equivalents (less cash on hand)	123,318	-	-	123,318
<i>Investment securities measured at amortised cost</i>				
- rated from BBB- to BBB+	5,908	-	-	5,908
- rated from BB- to BB+	1,009	-	-	1,009
- rated from B- to B+	-	-	-	-
	6,917	-	-	6,917
Loss allowance	(6)	-	-	(6)
Total investment securities measured at amortised cost	6,911	-	-	6,911
<i>Investment securities at fair value through other comprehensive income - debt</i>				
- rated from BBB- to BBB+	104,193	-	-	104,193
- rated from BB- to BB+	66,526	-	-	66,526
	170,719	-	-	170,719
Loss allowance	(165)	-	-	(165)
Total carrying amount of investment securities measured at fair value through other comprehensive income - debt	174,313	-	-	174,313
<i>Due from banks</i>				
- rated from BBB- to BBB+	1,826	-	-	1,826
- rated from BB- to BB+	1,014	-	-	1,014
- rated from B- to B+	5,901	19,216	-	25,117
- not rated	3,907	-	-	3,907
	12,648	19,216	-	31,864
Loss allowance	(87)	(485)	-	(572)
Total due from banks	12,561	18,731	-	31,292

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

4. FINANCIAL RISK REVIEW, CONTINUED

Credit quality analysis, continued

	31 December 2018				Total
	Stage 1 12-month expected credit losses (ECL)	Stage 2 Lifetime ECL for assets not credit- impaired	Stage 3 Lifetime ECL for credit- impaired assets	Originated credit- impaired financial assets (or POCI- assets)	
<i>Loans to corporate customers measured at amortised cost</i>					
Not overdue loans	320,252	65,932	92,020	479	478,683
Overdue loans:					
- overdue less than 30 days	539	6,907	69,003	2,200	78,649
- overdue 31-60 days	-	163	30,453	-	30,616
- overdue 61-90 days	-	45	18,137	-	18,182
- overdue 91-180 days	-	-	18,357	535	18,892
- overdue more than 180 days	-	-	31,996	-	31,996
	320,791	73,047	259,966	3,214	657,018
Loss allowance	(982)	(2,004)	(103,206)	-	(106,192)
Total loans to corporate customers measured at amortised cost	319,809	71,043	156,760	3,214	550,826
<i>Loans to individuals measured at amortised cost</i>					
Not overdue loans	246,158	36,209	9,800	-	292,167
Overdue loans:					
- overdue less than 30 days	6,954	2,848	20,082	-	29,884
- overdue 31-60 days	-	3,841	412	-	4,253
- overdue 61-90 days	-	3,328	5,778	-	9,106
- overdue 91-180 days	-	-	7,198	-	7,198
- overdue more than 180 days	-	-	46,613	-	46,613
	253,112	46,226	89,883	-	389,221
Loss allowance	(821)	(408)	(25,745)	-	(26,974)
Total loans to individuals measured at amortised cost	252,291	45,818	64,138	-	362,247
<i>Loans under reverse repo agreements</i>					
Reverse repo agreement	66,041	-	-	-	66,041
Loss allowance	-	-	-	-	-
Total loans under reverse repo agreements	66,041	-	-	-	66,041

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, unless otherwise stated)

5. NET INTEREST INCOME

	Year ended 31 December 2019	Year ended 31 December 2018
Interest income calculated using the effective interest rate method:		
Interest income on financial assets measured at amortised cost:		
- interest income on assets not credit-impaired	88,047	76,497
- interest income on credit-impaired assets	18,846	22,736
Interest income on financial assets measured at fair value through other comprehensive income	11,310	10,247
Total interest income calculated using the effective interest rate method	118,203	109,480
<i>Interest income on financial assets measured at amortised cost comprises:</i>		
Interest on loans to customers and banks	103,207	96,159
Interest on investment securities measured at amortised cost	1,079	1,281
Penalties on loans to customers and banks	1,164	614
Interest on due from banks	1,443	1,179
	106,893	99,233
Interest income on financial assets measured at fair value through profit or loss	-	224
Other interest income	-	224
Total interest income	118,203	109,704
Interest expense:		
Interest expense on financial liabilities measured at amortised cost	(61,837)	(65,506)
Total interest expense	(61,837)	(65,506)
Interest expense on financial liabilities measured at amortised cost		
Interest on customer and bank accounts	(37,936)	(45,374)
Interest on debt securities issued	(8,960)	(4,218)
Interest on due to banks and financial institutions	(7,304)	(7,951)
Interest on subordinated bonds	(7,637)	(7,963)
<i>Total interest expense on financial liabilities measured at amortised cost</i>	(61,837)	(65,506)
	56,366	44,198

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, unless otherwise stated)

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

Years ended	Corporate loans	Small and medium-sized enterprises	Mortgage loans	Consumer loans	Business development	Car loans	Loans to banks	Total loans to customers and banks
31 December 2019 and 31 December 2018								
1 January 2018 (restated)	116,215	13,804	6,961	7,704	5,749	115	-	150,548
Charge/(recovery) of allowance*	17,605	101	3,709	2,797	2,966	(1)	25	27,202
New financial assets originated or purchased*	1,900	881	32	792	7	-	-	3,612
Effect of unwinding of discount**	4,425	438	50	8	190	380	-	5,491
Write-off of assets	(46,649)	(4,752)	(3,186)	(2,694)	(352)	(45)	-	(57,678)
Recoveries of amounts previously written off	173	74	793	396	62	15	-	1,513
Foreign exchange difference	1,771	206	165	186	173	2	-	2,503
31 December 2018 (restated)	95,440	10,752	8,524	9,189	8,795	466	25	133,191
1 January 2019 (restated)	95,440	10,752	8,524	9,189	8,795	466	25	133,191
Charge/(recovery) of allowance*	22,580	1,637	7,162	4,877	3,610	(35)	(20)	39,811
New financial assets originated or purchased*	434	238	10	2,018	21	-	5	2,726
Effect of unwinding of discount**	3,755	506	53	236	323	1	-	4,874
Write-off of assets	(44,041)	(4,879)	(7,667)	(6,592)	(6,154)	(374)	-	(69,707)
Recoveries of amounts previously written off	273	145	413	384	135	40	-	1,390
Foreign exchange difference	(2,253)	(65)	(68)	(83)	(51)	(1)	-	(2,521)
31 December 2019	76,188	8,334	8,427	10,029	6,679	97	10	109,764

*Provisions recognised during the twelve months ended 31 December 2019 and 31 December 2018 are presented in the separate statement of profit or loss in "Expected credit loss allowance on interest-bearing assets" line item.

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

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of KZT, unless otherwise stated)

7. FEE AND COMMISSION INCOME/(EXPENSE)

	For the year ended 31 December 2019	For the year ended 31 December 2018
Payment cards	8,089	6,994
Settlement	7,805	6,552
Cash operations	4,590	4,736
Guarantees issued	4,428	3,853
Custodian activities	263	266
Documentary operations	112	148
Internet banking services	112	584
Trust operations	100	181
Foreign exchange operations	-	407
Other	249	159
Total fees and commissions income	25,748	23,880
Payment cards	(5,666)	(3,166)
Settlement	(1,148)	(544)
Documentary operations	(275)	(334)
Custodian activities	(107)	(100)
Other	(440)	(222)
Total fees and commissions expenses	(7,636)	(4,366)
	18,112	19,514

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:

- 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 moment of the transaction execution;
- commission fee on guarantees and letters of credit issued is paid in advance and is recognised as income over the 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 mln	For the year ended 31 December 2019	For the year ended 31 December 2018
Receivables which are included in 'other assets' (Note 18)	8,073	8,047

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

	Year ended 31 December 2019	Year ended 31 December 2018
Unrealised gain/(loss) on operations with derivative financial instruments	9	4,068
Unrealised loss on movement in fair value	-	(1,170)
Realised gain on operations with derivative financial instruments	692	742
	701	3,640

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of KZT, unless otherwise stated)

9. NET GAIN ON FOREIGN EXCHANGE OPERATIONS

	For the year ended 31 December 2019	For the year ended 31 December 2018
Dealing operations, net	5,588	5,993
Translation differences, net	(372)	(2,872)
	<u>5,216</u>	<u>3,121</u>

10. OPERATING EXPENSES

	For the year ended 31 December 2019	For the year ended 31 December 2018
Wages and salaries	17,238	12,523
Taxes other than on income	3,236	2,835
Lease expenses	3,202	2,651
Depreciation and amortisation	2,866	2,380
Administrative expenses	2,712	2,405
Contributions to Deposit Insurance Fund	1,982	2,380
Security and security alarming expenses	916	705
Telecommunications	828	654
Professional services	611	226
Collection expenses	512	580
Equipment repair and maintenance	450	481
Advertising costs	381	335
Business travel expenses	318	325
Representation expenses	50	33
Other expenses	744	632
	<u>36,046</u>	<u>29,145</u>

11. INCOME TAX EXPENSE

	For the year ended 31 December 2019	For the year ended 31 December 2018
Current year tax expense	-	-
Movement in deferred tax liabilities due to origination and reversal of temporary differences and movement in loss allowance	381	2,392
Total income tax expense	<u>381</u>	<u>2,392</u>

In 2019, the applicable tax rate for current and deferred tax is 20% (2018: 20%).

Reconciliation of effective tax rate for the year ended 31 December

	31 December 2019	%	31 December 2018	%
Profit before income tax	<u>1,878</u>		<u>12,015</u>	
Income tax at the applicable income tax rate	376	20.00	2,403	20.00
Non-taxable interest and other income on transactions with government securities and other qualified securities	(1,537)	(82)	-	-
Non-taxable income	-	-	(945)	(7.87)
Non-deductible operating and other expenses	1,542	(82)	934	7.77
	<u>381</u>	<u>20.29</u>	<u>2,392</u>	<u>19.90</u>

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of KZT, unless otherwise stated)

11. INCOME TAX EXPENSE, CONTINUED

(a) Deferred tax assets and liabilities

Temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes give rise to deferred tax liabilities as at 31 December 2019 and 31 December 2018.

Movements in temporary differences during 2019 and 2018 are presented as follows:

	Balance at 1 January 2019	Recognised in profit or loss	Recognised in equity	Balance at 31 December 2019
2019				
Accrued interest payable	123	(57)	-	66
Investment securities measured at fair value through other comprehensive income	159	-	(197)	(38)
Tax loss carried forward	1,123	-	-	1,123
Other	164	115	-	279
Effect of modification of financial assets terms	405	(148)	-	257
Discount on loans to customers	-	493	-	493
Discount on low-interest customers and banks accounts	(240)	(621)	-	(861)
Discount on subordinated bonds	(7,564)	189	-	(7,375)
Property, plant and equipment and intangible assets	(2,573)	(352)	-	(2,925)
	(8,403)	(381)	(197)	(8,981)
	Balance at 1 January 2018	Recognised in profit or loss	Recognised in equity	Balance at 31 December 2018
2018				
Accrued interest payable	101	22	-	123
Financial assets and liabilities at fair value through profit or loss	113	46	-	159
Tax loss carried forward	171	(909)	1,861	1,123
Other	320	(156)	-	164
Effect of modification of financial assets terms	-	(204)	609	405
Discount on low-interest customers and banks accounts	-	(240)	-	(240)
Discount on subordinated bonds	(6,987)	(577)	-	(7,564)
Property, plant and equipment and intangible assets	(3,298)	(374)	1,099	(2,573)
	(9,580)	(2,392)	3,569	(8,403)

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of KZT, unless otherwise stated)

12. CASH AND CASH EQUIVALENTS

	31 December 2019	31 December 2018
Cash on hand	65,448	51,917
Nostro accounts with the NBRK	43,105	94,388
Nostro accounts with other banks		
- rated from AA- to AA+	7,822	2,577
- rated from A- to A+	25,373	9,853
- rated from BBB- to BBB+	6,780	4,265
- rated from BB- to BB+	3,929	5,733
- rated from B- to B+	40	54
-not rated	518	302
Total gross nostro accounts with other banks	44,462	22,784
Loss allowance	(21)	(18)
Total nostro accounts with other banks	44,441	22,766
Term deposits with other banks		
- rated from BBB- to BBB+	-	1,988
- rated from B- to B+	5,796	4,231
Total gross term deposits with other banks	5,796	6,219
Loss allowance	(134)	(55)
Total current accounts and term deposits with other banks	5,662	6,164
Total cash and cash equivalents	158,656	175,235

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 categorised to Stage 1 of the credit risk grading.

As at 31 December 2019 the Bank has accounts with two banks (31 December 2018: 1 bank), whose balances exceed 10% of equity. The gross value of these balances as at 31 December 2019 is KZT 73,869 million (31 December 2018: KZT 94,388 million).

Minimum reserve requirements

As at 31 December 2019, 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 2019 the minimum reserve requirements amounted to KZT 13,749 million (31 December 2018: KZT 12,704 million) and reserve asset amounted to KZT 17,089 million (31 December 2018: KZT 34,866 million).

13. INVESTMENT SECURITIES

	31 December 2019	31 December 2018
Investment securities measured at fair value through other comprehensive income	160,540	170,876
Investment financial assets measured at amortised cost	2,529	6,911
Total investment securities	163,069	177,787

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (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 2019	Nominal interest rate, %	31 December 2018
<i>Debt securities</i>				
Government bonds of the Republic of Kazakhstan	5.3-10.2	21,882	2.38- 10.2	42,110
Corporate bonds	2.12-8.5	63,714	3.88-11.5	88,016
Discounted NBRK notes		74,581		40,593
<i>Equity securities</i>				
Shares of Kazakhstan corporations		342		135
Shares of international corporations		21		22
		<u>160,540</u>		<u>170,876</u>

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

Investment securities measured at amortised cost

	Nominal interest rate, %	31 December 2019	Nominal interest rate, %	31 December 2018
<i>Debt securities</i>				
Government bonds of the Republic of Kazakhstan	5.80-6.70	2,529	5.60-6.70	5,908
Corporate bonds	-	-	8.0	1,009
		<u>2,529</u>		<u>6,917</u>
Allowance for expected credit losses		-		(6)
		<u>2,529</u>		<u>6,911</u>

14. DUE FROM BANKS

	31 December 2019	31 December 2018
- Term deposits		
- Conditional deposit with the NBRK	5,934	1,826
- rated from AA- to AA+	3,126	-
- rated from BB- to BB+	-	1,014
- rated from B- to B+	-	25,117
- not rated	50	3,907
Gross term deposits	<u>9,110</u>	<u>31,864</u>
Allowance for expected credit losses	(8)	(572)
Total term deposits	<u>9,102</u>	<u>31,292</u>

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 2019, all due from banks are categorised to Stage 1 of the credit risk grading.

As at 31 December 2018, a term deposit in the amount of KZT 19,216 million has been categorised to Stage 2 of the credit risk grading, the remainder of due from banks has been categorised to Stage 1 of the credit risk grading.

As at 31 December 2019, conditional deposit with the NBRK comprises KZT 3,864 million (31 December 2018: KZT 1,183 million) received from the Development Bank of Kazakhstan JSC ("DBK JSC") and KZT 2,070 million (31 December 2018: KZT 643 million) received from DAMU Entrepreneurship Development Fund JSC ("EDF DAMU") in accordance with the loan agreements with JSC DBK and EDF DAMU. Funds will be distributed as loans to small and medium businesses on special preferential terms. These funds may be withdrawn from the conditional deposit only after approval of JSC DBK and EDF DAMU, respectively.

Concentration of placements with banks

As at 31 December 2019 the Bank has no banks (2018: one bank), whose balances exceed 10% of equity. The gross value of these balances as at 31 December 2018 is KZT 19,216 million.

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, unless otherwise stated)

15. INVESTMENTS 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	
JSC BCC Invest	The Republic of Kazakhstan		Brokerage and dealer activity	
Center Leasing LLP	The Republic of Kazakhstan		Finance lease	

	31 December 2019		31 December 2018	
	Ownership interest, %	Amount	Ownership interest, %	Amount
BCC-SAOO LLP	100.00	9,640	100.00	9,640
JSC BCC Invest	100.00	14,872	97.63	12,749
Center Leasing LLP	90.75	1,139	90.75	1,139
		25,651		23,528
Less: loss allowance		(277)		(277)
Total investments in subsidiaries		25,374		23,251

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 create special subsidiaries to purchase banks’ non-performing (distressed) assets and manage them. On 21 August 2013, the Bank’s special subsidiary LLP BCC-SAOO intended for the management of distressed assets was registered with the Ministry of Justice of the Republic of Kazakhstan.

In May 1998, JSC BCC Invest was established as a limited liability partnership (previously named “LLP KIB ASSET MANAGEMENT”) in accordance with legislation of the Republic of Kazakhstan. On 26 September 2006, LLP KIB ASSET MANAGEMENT was re-registered as a joint stock company. The main activity of JSC BCC Invest is management of assets of mutual funds and management of investment portfolios. During 2018, the Bank increased capitalisation of JSC BCC Invest to expand the subsidiary’s operations and improve business synergy of the banking group.

In September 2002, LLP Center Leasing was established as a limited liability partnership in accordance with the legislation of the Republic of Kazakhstan. The main activity of LLP Center Leasing is leasing operations, which are carried out in accordance with Article 10 of the Law of the Republic of Kazakhstan “On Financial Leasing”. LLP Center Leasing is in the process of liquidation.

16. LOANS TO CUSTOMERS AND BANKS

	31 December 2019	31 December 2018
Loans to customers	927,487	981,175
Accrued interest	51,747	65,064
	979,234	1,046,239
Less: credit loss allowance	(109,754)	(133,166)
Total loans to customers	869,480	913,073
Loans to banks	765	1,214
Accrued interest	4	4
Less: credit loss allowance	(10)	(25)
Total loans to banks	759	1,193
Continued involvement in the asset	103,081	30,906
Loans under reverse repurchase agreements	53,051	66,041
Total loans to customers and banks	1,026,371	1,011,213

Movement in credit loss allowance for loans to customers and banks for the twelve months ended 31 December 2019 and 31 December 2018 is disclosed in Note 6.

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (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 2019:

	Gross amount	Credit loss allowance	Carrying amount
Loans to corporate customers			
Corporate loans	493,772	(76,188)	417,584
Small and medium-sized enterprises	135,626	(8,334)	127,292
Loans to individuals			
Mortgage loans	110,916	(8,427)	102,489
Consumer loans	147,881	(10,029)	137,852
Business development	83,325	(6,679)	76,646
Auto loans	7,714	(97)	7,617
	979,234	(109,754)	869,480

The following table provides information by types of loan products as at 31 December 2018:

	Gross amount	Credit loss allowance	Carrying amount
Loans to corporate customers			
Corporate loans	531,586	(95,440)	436,146
Small and medium-sized enterprises	125,432	(10,752)	114,680
Loans to individuals			
Mortgage loans	155,672	(8,524)	147,148
Consumer loans	130,884	(9,189)	121,695
Business development	95,900	(8,795)	87,105
Auto loans	6,765	(466)	6,299
	1,046,239	(133,166)	913,073

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, 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 2019 was as follows:

	Corporate loans	Small- and medium-sized enterprises	Mortgage loans	Consumer loans	Business development	Auto loans	Total
Loans to customers							
Not overdue	454,873	114,652	86,209	118,343	63,370	7,407	844,854
Overdue loans							
- overdue less than 30 days	12,901	4,644	3,552	4,635	3,145	61	28,938
- overdue 31-60 days	6,106	607	1,433	1,737	410	13	10,306
- overdue 61-90 days	249	3,504	1,092	1,258	490	12	6,605
- overdue 91-180 days	1,220	899	1,598	2,329	1,290	13	7,349
- overdue more than 180 days	18,423	11,320	17,032	19,579	14,620	208	81,182
Gross loans to customers	493,772	135,626	110,916	147,881	83,325	7,714	979,234
Credit loss allowance	(76,188)	(8,334)	(8,427)	(10,029)	(6,679)	(97)	(109,754)
Total loans to customers, net of allowance for expected credit losses	417,584	127,292	102,489	137,852	76,646	7,617	869,480

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, 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

Analysis by credit quality of loans to customers outstanding as at 31 December 2018 was as follows:

	Corporate loans	Small- and medium-sized enterprises	Mortgage loans	Consumer loans	Business development	Auto loans	Total
Loans to customers							
Not overdue	380,584	98,099	122,470	95,753	67,863	6,081	770,850
Overdue loans							
- overdue less than 30 days	70,843	7,806	13,297	9,997	6,503	87	108,533
- overdue 31-60 days	30,415	201	2,130	1,559	527	37	34,869
- overdue 61-90 days	16,587	1,595	2,892	5,493	681	40	27,288
overdue 91-180 days	11,578	7,314	1,570	1,322	4,262	44	26,090
- overdue more than 180 days	21,579	10,417	13,313	16,760	16,064	476	78,609
Gross loans to customers	531,586	125,432	155,672	130,884	95,900	6,765	1,046,239
Credit loss allowance	(95,440)	(10,752)	(8,524)	(9,189)	(8,795)	(466)	(133,166)
Total loans to customers, net of allowance for expected credit losses	436,146	114,680	147,148	121,695	87,105	6,299	913,073

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

At 31 December 2019, the significant assumptions used by management to determine the amount of credit loss allowance for loans to corporate customers classified into Stage 3 of credit risk and include:

- 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 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 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 Group expects that the debt according to the agreed list of borrowers will be repaid during the five years. The worked out Action Plan is in the process of approval by the regulator. Under this Plan the Group will start submitting report on the status of plan execution to the regulator on a quarterly basis.

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

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

	The twelve months ended			Total
	31 December 2019			
	Stage 1 12-month expected credit losses (ECL)	Stage 2 Lifetime ECL for assets not credit-impaired	Stage 3 Lifetime ECL for credit- impaired assets	
Loans to corporate customers and loans to small and medium-sized enterprises				
Allowance for expected credit losses at the beginning of the period	982	2,004	103,206	106,192
Transfer to 12-month expected credit losses	5	(4)	(1)	-
Transfer to lifetime expected credit losses for assets not credit-impaired	(1)	1,691	(1,690)	-
Transfer to lifetime expected credit losses for credit-impaired assets	(30)	(670)	700	-
Charge/(recovery) of allowance	(366)	(309)	24,892	24,217
New financial assets originated or purchased	513	6	153	672
Unwinding of discount	-	-	4,261	4,261
Write-off of assets	-	-	(48,920)	(48,920)
Recovery of the previously written off assets	-	-	418	418
Foreign exchange difference	(19)	(51)	(2,248)	(2,318)
Allowance for ECL at the end of the period	1,084	2,667	80,771	84,522

	The twelve months ended			Total
	31 December 2019			
	Stage 1 12-month expected credit losses (ECL)	Stage 2 Lifetime ECL for assets not credit-impaired	Stage 3 Lifetime ECL for credit- impaired assets	
Loans to individuals				
Allowance for expected credit losses at the beginning of the period	828	880	25,266	26,974
Transfer to 12-month expected credit losses	2	(1)	(1)	-
Transfer to lifetime expected credit losses for assets not credit-impaired	(90)	109	(19)	-
Transfer to lifetime expected credit losses for credit-impaired assets	(339)	(89)	428	-
Charge/(recovery) of allowance	(363)	302	15,675	15,614
New financial assets originated or purchased	1,941	92	16	2,049
Unwinding of discount	-	-	613	613
Write-off of assets	-	-	(20,787)	(20,787)
Recovery of the previously written off assets	-	-	972	972
Foreign exchange difference	(18)	(7)	(178)	(203)
Allowance for ECL at the end of the period	1,961	1,286	21,985	25,232

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of KZT, unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

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

	The twelve months ended			Total
	31 December 2018			
	Stage 1 12-month expected credit losses (ECL)	Stage 2 Lifetime ECL for assets not credit-impaired	Stage 3 Lifetime ECL for credit- impaired assets	
Loans to corporate customers and loans to small and medium-sized enterprises				
Allowance for expected credit losses at the beginning of the period	2,255	1,976	125,788	130,019
Transfer to 12-month expected credit losses	3	(3)	-	-
Transfer to lifetime expected credit losses for assets not credit-impaired	(40)	40	-	-
Transfer to lifetime expected credit losses for credit-impaired assets	(155)	(1,584)	1,739	-
Charge/(recovery) of allowance	(3,080)	749	20,037	17,706
New financial assets originated or purchased	1,985	796	-	2,781
Unwinding of discount (restated)	-	-	4,863	4,863
Write-off of assets (restated)	-	-	(51,401)	(51,401)
Recovery of the previously written off assets	-	-	247	247
Foreign exchange difference	14	30	1,933	1,977
Allowance for expected credit losses at the end of the period	982	2,004	103,206	106,192
Loans to individuals				
Allowance for expected credit losses at the beginning of the period	301	1,402	18,826	20,529
Transfer to 12-month expected credit losses	1	(1)	-	-
Transfer to lifetime expected credit losses for assets not credit-impaired	(28)	53	(25)	-
Transfer to lifetime expected credit losses for credit-impaired assets	(1,093)	(493)	1,586	-
Charge/(recovery) of allowance	838	(130)	8,763	9,471
New financial assets originated or purchased	791	40	-	831
Unwinding of discount (restated)	-	-	628	628
Write-off of assets (restated)	-	-	(6,277)	(6,277)
Recovery of the previously written off assets	-	-	1,266	1,266
Foreign exchange difference	18	9	499	526
Allowance for expected credit losses at the end of the period	828	880	25,266	26,974

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(c) Analysis of movements in gross carrying amount

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 customers and small and medium-sized enterprises

- A volume of loans issued to customers during the twelve months of 2019 caused increase in gross carrying amount of the portfolio of loans to corporate customers and small and medium-sized enterprises by KZT 178,617 million, while respective increase in 12-month loss allowance amounted to KZT 519 million.
- A volume of loans repaid during the twelve months of 2019 caused decrease in gross carrying amount of the portfolio of loans to corporate customers and small and medium-sized enterprises by KZT 169,938 million, while respective decrease in 12-month loss allowance amounted to KZT 407 million.
- Write-off of loans with gross carrying amount of KZT 48,920 million resulted in decrease in loss allowance for loans categorised to Stage 3 by the same amount.

Loans to individuals

- A large volume of loans issued to customers during the twelve months of 2019 caused increase in gross carrying amount of the portfolio of retail loans by KZT 46,686 million, while respective increase in loss allowance for 12-month ECL amounted to KZT 2,033 million.
- A large volume of loans repaid during the twelve months of 2019 caused decrease in gross carrying amount of the portfolio of retail loans by KZT 52,556 million, while respective decrease in loss allowance for 12-month ECL amounted to KZT 476 million.
- Write-off of loans with gross carrying amount of KZT 20,787 million resulted in decrease in loss allowance for loans categorised to 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 tables provides information on collateral and other credit enhancements securing loans to corporate customers and small and medium-sized customers (net of loss allowance for expected credit losses) by types of collateral.

31 December 2019	Carrying amount of loans to customers	Fair value of collateral: for collateral assessed as of the reporting date	Fair value of collateral: for collateral assessed as of loan inception date	Fair value of collateral not determined
<i>Loans to corporate customers</i>				
Cash and deposits	841	841	-	-
Real estate	302,826	302,826	-	-
Vehicles	606	606	-	-
Equipment	16,149	16,149	-	-
Corporate guarantees	30,077	-	-	30,077
Income from future contracts	20,266	-	-	20,266
Goods in turnover	7,330	-	-	7,330
Subsoil use rights	24,297	24,297	-	-
Other collateral	3,139	-	3,139	-
No collateral or other credit enhancement	12,053	-	-	12,053
Total loans to corporate customers	417,584	344,719	3,139	69,726

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, 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 2019	Carrying amount of loans to customers	Fair value of collateral: for collateral assessed as of the reporting date	Fair value of collateral: for collateral assessed as of loan inception date	Fair value of collateral not determined
<i>Loans to small and medium-sized enterprises</i>				
Cash and deposits	5,284	5,284	-	-
Real estate	106,023	106,023	-	-
Vehicles	781	781	-	-
Equipment	3,667	3,667	-	-
Corporate guarantees	7,676	-	-	7,676
Goods in turnover	397	-	-	397
Other collateral	1,241	158	656	427
No collateral or other credit enhancement	2,223	-	-	2,223
Total loans to small and medium-sized enterprises	127,292	115,913	656	10,723
Total loans to corporate customers	544,876	460,632	3,795	80,449
31 December 2018	Carrying amount of loans to customers	Fair value of collateral: for collateral assessed as of the reporting date	Fair value of collateral: for collateral assessed as of loan inception date	Fair value of collateral not determined
<i>Loans to corporate customers</i>				
Cash and deposits	2,257	2,257	-	-
Real estate	320,983	320,983	-	-
Vehicles	492	492	-	-
Equipment	9,753	9,753	-	-
Corporate guarantees	44,230	-	-	44,230
Income from future contracts	12,825	-	-	12,825
Goods in turnover	6,325	-	-	6,325
Subsoil use rights	3,372	3,372	-	-
Other collateral	12,893	-	12,893	-
No collateral or other credit enhancement	23,016	-	-	23,016
Total loans to corporate customers	436,146	336,857	12,893	86,396
<i>Loans to small and medium-sized enterprises</i>				
Cash and deposits	2,587	2,587	-	-
Real estate	102,618	102,618	-	-
Vehicles	1,058	1,058	-	-
Equipment	856	856	-	-
Corporate guarantees	4,201	-	-	4,201
Goods in turnover	141	-	-	141
Other collateral	1,682	-	1,682	-
No collateral or other credit enhancement	1,537	-	-	1,537
Total loans to small and medium-sized enterprises	114,680	107,119	1,682	5,879
Total loans to corporate customers	550,826	443,976	14,575	92,275

The tables above exclude overcollateralisation. In accordance with the recommendations of the NBRK, income from future contract is not sufficient and cannot be used in calculation of allowances. As at 31 December 2019 loans to corporate customers with a net carrying amount of KZT 20,266 million (31 December 2018: KZT 12,825 million) are secured by income from future contracts.

The amount stated in 'No collateral or other credit enhancement' item comprises unsecured loans and parts of loans, which are not fully secured.

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, 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*

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 assessment of credit losses 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 2019, the net carrying amount of credit-impaired loans to corporate customers amounts to KZT 144,389 million (2018: KZT 224,111 million), while the value of collateral (mostly commercial real estate) securing these loans is KZT 125,135 million (2018: KZT 226,134 million), excluding overcollateralisation. Value of collateral securing each loan is limited by the loan carrying amount.

During 2019, there was no change in the Bank's collateral policy.

(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 9,533 million (31 December 2018: KZT 16,310 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 5,196 million (31 December 2018: KZT 7,723 million).

For mortgage loans with a net carrying amount of KZT 92,956 million (31 December 2018: KZT 130,838 million) management believes that the fair value of collateral 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 48 million (31 December 2018: KZT 51 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 12 million (31 December 2018: KZT 13 million).

For auto loans with a net carrying amount of KZT 7,569 million (31 December 2018: KZT 6,248 million) management believes that the fair value of collateral 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 67,025 million (31 December 2018: KZT 26,132 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 2,651 million (31 December 2018: KZT 5,846 million).

For consumer loans with a net carrying amount of KZT 70,827 million (31 December 2018: KZT 95,563 million) management believes that the fair value of collateral is at least equal to the carrying amount of individual loans at the reporting date.

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

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

(ii) Loans to retail customers, continued

Business development

Included in the business development portfolio are loans with a net carrying amount of KZT 4,877 million (31 December 2018: KZT 6,923 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 2,048 million (31 December 2018: KZT 3,379 million).

Management believes that the fair value of collateral of business development loans with a net carrying amount of KZT 71,769 million (31 December 2018: KZT 80,182 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 costs for obtaining and selling the collateral. For credit-impaired loans the value of collateral is based on the most recent appraisals.

	2019	2018
Credit-impaired loans		
A ratio of the gross carrying amount of the loan to the value of the collateral (LTV ratio)		
Less than 50%	20,584	21,919
51-70%	5,518	7,751
More than 70%	18,218	34,468
Total	44,320	64,138

Repossessed collateral

During 2019, the Bank obtained certain assets by taking possession of collateral for loans to customers with a net carrying amount of KZT 2,658 million (2018: KZT 5,046 million). As at 31 December 2019, the repossessed collateral was KZT 16,445 million (31 December 2018: KZT 19,213 million of repossessed collateral) (Note 18).

(e) Loan portfolio analysis

As at 31 December 2019 the Bank has 11 borrowers or groups of related borrowers (31 December 2018: 14), whose loan balances exceed 10% of equity. The gross value of these balances as at 31 December 2019 is KZT 301,185 million (31 December 2018: KZT 339,579 million).

As at 31 December 2019 and 31 December 2018 included in the loans to customers are renegotiated loans of KZT 64,359 million and KZT 76,716 million, respectively. Otherwise these loans would be past due or impaired.

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of KZT, unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(e) Loan portfolio analysis, continued

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 2019	31 December 2018
Individuals	349,836	389,221
Trade	106,844	125,121
Rent of real estate	94,300	104,923
Manufacturing	5,147	90,124
Oil and gas industry	40,840	39,715
Transport and telecommunications	39,482	39,852
Housing construction	40,149	35,184
Industrial construction	28,833	34,412
Food industry	19,542	32,484
Power industry	30,783	29,004
Transportation and equipment maintenance services	28,272	22,553
Agriculture	20,320	22,123
Financial services	111,519	20,354
Other	63,367	61,169
Total	979,234	1,046,239
Allowance for expected credit losses	(109,754)	(133,166)
	869,480	913,073

Fair value of assets received as collateral and carrying amount of reverse repurchase agreements as at 31 December 2019 and 31 December 2018 is as follows:

	31 December 2019		31 December 2018	
	Carrying amount of loans	Fair value of collateral	Carrying amount of loans	Fair value of collateral
Government bonds of the Republic of Kazakhstan	52,263	52,618	66,041	66,190
Other	788	720	-	-
	53,051	53,338	66,041	66,190

(f) Loan maturities

The maturity of the Bank's loan portfolio as at the reporting date is presented in Note 27, 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 of Kazakhstan by the President of the Republic of Kazakhstan "Five Social Initiatives of the President", the Program "7-20-25. "New Opportunities for Each Family to Procure Housing" (the "Program") was approved by the Resolution of the NBRK of 31 May 2018. To implement the Programme, Mortgage Organisation "Baspana" JSC (the "Operator") was established.

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: it 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 provision to the Operator of documents in accordance with an agreement, no more frequently than once in 10 business days.

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of KZT, unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(g) Continuing involvement in the asset, continued

In accordance with the Programme and Trust Management Contract concluded with the Operator, 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 Programme 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;
- Commission for issue and servicing a loan: nil;
- 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 body where such housing facility is located.

As at 31 December 2019, 10,101 loans in the amount of more than KZT 106,000 million have been issued under the Program “7-20-25” (2018: 2,733 loans for the amount of KZT 32,000 million).

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

The lending conditions under “Baspana Hit” Programme are as follows:

- Interest rate is calculated with the formula: a 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 estate.
- 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.

JOINT-STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of KZT, unless otherwise stated)

16. LOANS TO CUSTOMERS AND BANKS, CONTINUED

(g) Continuing involvement in the asset, continued

The lending conditions under “Baspana Hit” Programme are as follows, continued:

- 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 2019, the Bank has issued 3,497 loans in the amount of more than KZT 30,023 million under Baspana Hit Programme (31 December 2018: 4 loans in the amount of KZT 22 million).

(h) Transfer of financial assets

During 2019, the Bank sold a portfolio of mortgage loans at its carrying amount, the balance of which amounted to KZT 103,081 million at the year-end (2018: KZT 30,906 million) and issued a customer a guarantee of reverse repurchase or exchange of individual 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 transferred nor retained substantially all the risks and rewards of ownership of the financial asset transferred; however, the Bank has determined that it retained 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 103,082 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of Kazakhstani tenge, unless otherwise stated)

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 2018	31,016	13,882	105	9,327	54,330
Acquisitions	2	3,167	120	862	4,151
Transfers	87	5	(92)	-	-
Disposals	(9,928)	(1,752)	-	(448)	(12,128)
31 December 2018	21,177	15,302	133	9,741	46,353
Acquisitions	831	4,050	5	1,006	5,892
Transfers	120	5	(125)	-	-
Disposals	(151)	(950)	-	(7)	(1,108)
31 December 2019	21,977	18,407	13	10,740	51,137
Accumulated depreciation, amortisation and impairment					
1 January 2018	(394)	(8,831)	-	(4,337)	(13,562)
Charge for the year	(233)	(1,361)	-	(786)	(2,380)
Disposals	117	1,733	-	448	2,298
31 December 2018	(510)	(8,459)	-	(4,675)	(13,644)
Charge for the year	(233)	(1,708)	-	(924)	(2,865)
Disposals	5	915	-	7	927
31 December 2019	(738)	(9,252)	-	(5,592)	(15,582)
Net carrying amount					
31 December 2019	21,239	9,155	13	5,148	35,555
31 December 2018	20,667	6,843	133	5,066	32,709

Intangible assets include computer software, patents and licences.

The Bank revalued its buildings and constructions during 2017. 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 2019 and 31 December 2018, the total amount of fair value of buildings and constructions was KZT 22,148 million and KZT 20,667 million, respectively. If buildings and constructions of the Bank had been valued at cost, their carrying amount would have been KZT 18,735 million and KZT 18,164 million as at 31 December 2019 and 31 December 2018, respectively.

The fair value of buildings and constructions is categorised into Level 2 and Level 3 of the fair value hierarchy.

18. OTHER ASSETS

	31 December 2019	31 December 2018
Other financial assets		
Accounts receivable	7,593	3,949
Accrued commission	8,073	8,047
Western Union and other wireless transfers	334	164
	16,000	12,160
Allowance for expected credit losses	(2,465)	(1,372)
	13,535	10,788
Other non-financial assets		
Reposessed collateral	16,445	19,213
Payment receivable on reposessed collateral	4,884	3,281
Taxes receivable other than income tax	1,097	609
Advances paid	939	457
Inventories	36	40
Other assets	8	412
	23,409	24,012
	36,944	34,800

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge, unless otherwise stated)

18. OTHER ASSETS, CONTINUED

As at 31 December 2019 other financial assets of KZT 13,441 million were categorised to Stage 1 of the credit risk gradings (31 December 2018: KZT 8,905 million), KZT 869 million and KZT 1,690 million are categorised to Stages 2 and 3 of credit risk gradings, respectively (31 December 2018: KZT 518 million and KZT 2,737 million, respectively).

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

2019	Stage 1	Stage 2	Stage 3	Total
Balance at 1 January	-	-	(1,388)	(1,388)
Net remeasurement of loss allowance	(705)	(70)	(394)	(1,169)
Write-offs	-	-	92	92
Balance at 31 December	(705)	(70)	(1,690)	(2,465)

2018	Stage 1	Stage 2	Stage 3	Total
Balance at 1 January	-	-	(1,747)	(1,747)
Net remeasurement of loss allowance	-	-	375	375
Balance at 31 December	-	-	(1,372)	(1,372)

Repossessed collateral. Repossessed collateral represents real estate accepted by the Bank in exchange for its liabilities on credit-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.

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 2019	Nominal interest rate, %	31 December 2018
Long-term loans due to banks and financial institutions	1.00-9.08	52,347	1.00-9.80	62,563
Perpetual financial instruments	7.9255	30,610	8.34	31,061
Loans due to international credit organisations	7.80-9.45	16,841	8.50-10.00	16,920
Correspondent accounts of banks		7,688	-	10,201
Loans due to NBRK	9.25	74	5.50	90
Accrued interest expense		635		988
		108,195		121,823

Long-term loans due to banks and financial institutions. Long-term loans due to banks and financial institutions comprise long-term loans from JSC Entrepreneurship Development Fund DAMU ("DAMU") and JSC Development Bank of Kazakhstan ("JSC DBK") in the amount of KZT 36,540 million at 1%-9.08% p.a. maturing in 2020-2035 and of KZT 15,807 million at 1%-2% p.a. maturing in 2034-2037, as at 31 December 2019, respectively (31 December 2018: KZT 48,079 million and KZT 14,483 million, respectively). During the 2019 and 2018, the Bank has been repaying principal and interest according to the repayment schedules.

During the year ended 31 December 2019, the Bank received additional tranche of long-term loans from JSC DBK in the amount of KZT 3,189 million (the year ended 31 December 2018: KZT 445 million) at 1-2% p.a. maturing in 2034-2037. 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 the year ended 31 December 2019, the Bank received a long-term loan from JSC DAMU in the amount of KZT 1,096 million at 1% p.a. and additional tranche of KZT 378 million at 4.5% p.a. maturing in 2025. During 2019 the Bank repaid a long-term loan from JSC DAMU in the amount of 11,111 million at 7% per annum.

During the year ended 31 December 2018, the Bank received a long-term loan from JSC DAMU in the amount of KZT 13,289 million at 9.08% p.a. maturing in 2020, KZT 700 million at 4.5% p.a. and KZT 400 million at 1% p.a. maturing in 2025.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of Kazakhstani tenge)

19. DUE TO BANKS AND FINANCIAL INSTITUTIONS, CONTINUED

The loans from JSC DAMU were received in accordance with the Government program to finance small and medium enterprises (“SME”) of certain industries (“the Program”). Under the loan agreement between DAMU and the Bank, the Bank extends loans to SME borrowers, eligible to participate in the Program, 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 the money from DAMU.

The Bank management believes that there are no other financial instruments similar to loans received from DAMU, JSC DBK and JSC Agrarian Credit Corporation 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, JSC DBK and JSC Agrarian Credit Corporation 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.

Perpetual financial instruments. The perpetual non-cumulative financial instruments were issued by the Bank in March 2006 with an option to repay in whole, but not in part, on any interest payment date from and including 3 March 2016 at the face value of USD 100 million. Interest payment dates are 3 March, 3 June, 3 September and 3 December in each year.

Loans due to international credit organisations. Loans due to international credit organisations comprise loans from the European Bank for Reconstruction and Development (“EBRD”) at 7.8%-9.45% p.a. maturing in 2020-2022.

During the year ended 31 December 2019 the Bank received a loan from European Bank for Reconstruction and Development JSC in the amount of KZT 8,651 million at 7.8% p.a. maturing in 2022. During 2019 the Bank has been repaying principal and interest according to the repayment schedules in the amount of KZT 10,448 million.

During the year ended 31 December 2018 the Bank received a loan from European Bank for Reconstruction and Development JSC in the amount of KZT 8,335 million at 8.5% p.a. maturing in 2021. During 2018 the Bank was repaying principal and interest according to the repayment schedules in the amount of KZT 8,860 million.

The Bank is obligated to comply with financial covenants in relation to funds and loans from banks and financial institutions mentioned above. These covenants include stipulated ratios, debt to equity ratios and various other financial performance ratios. As at 31 December 2019 and as at 31 December 2018 the Bank has not breached any of these covenants.

20. CUSTOMER AND BANK ACCOUNTS

	31 December 2019	31 December 2018
Customer accounts		
Retail	544,463	583,807
Corporate	414,774	494,272
	959,237	1,078,079
	31 December 2019	31 December 2018
Term deposits	684,967	767,684
Demand deposits	270,595	305,672
	955,562	1,073,356
Accrued interest	3,675	4,723
	959,237	1,078,079

As at 31 December 2019, the Bank has 1 customer (31 December 2018: 8 customers), whose balances exceed 10% of equity. The gross balances of the above-mentioned customers as at 31 December 2019 are KZT 17,019 million (31 December 2018: KZT 116,040 million).

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of Kazakhstani tenge)

20. CUSTOMER AND BANK ACCOUNTS, CONTINUED

	31 December 2019	31 December 2018
Analysis by sectors:		
Individuals	544,463	583,807
Construction	93,382	99,784
Social services	70,927	122,111
Trade	62,434	54,068
Education and health care	35,626	28,032
Transportation and communication	23,678	27,161
Manufacturing	15,520	25,457
Agriculture	13,547	14,042
Power industry	10,769	6,045
Entertainment services	9,863	4,548
Fuel	7,596	6,396
Research and development	6,216	4,582
Oil and gas industry	5,797	8,627
Insurance and pension fund activities	4,307	23,476
Chemical production	4,078	5,186
Metallurgy	3,377	10,586
Public administration	1,439	794
Machinery	1,305	3,117
Other	44,913	50,260
Total due to customers	959,237	1,078,079

21. DEBT SECURITIES ISSUED

	Currency	Date of issue	Maturity date	Interest rate, %	31 December 2019	Interest rate, %	31 December 2018
		16/03/2015-	16/03/2022-				
	KZT	31/10/2019	05/02/2028	8.50-12.00	77,798	8.00-12.00	69,251
Kazakhstani	USD	10/06/2019	10/06/2021	4.50	4,974	-	-
bonds					82,772		69,251
Accrued interest					1,215		1,334
					83,987		70,585

During twelve months ended 31 December 2019, the Bank issued debt securities with a nominal value of KZT 34,701 million.

Coupons on debt securities issued are repayable semi-annually; principal is repayable at maturity.

22. SUBORDINATED BONDS

	Currency	Date of issue	Maturity date	Interest rate, %	31 December 2019	Interest rate, %	31 December 2018
Fixed rate	KZT	27/11/2009-	27/11/2024-	4.00-11.00	52,025	4.00-11.00	50,678
		03/11/2017	03/11/2032				
Floating rate	KZT	05/12/2007 -	05/12/2022-	6.30-6.50	8,379	7.00-7.50	20,232
		11/11/2008	11/11/2023		60,404		70,910
Accrued interest					1,067		1,144
					61,471		72,054

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

Participation in the Program 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 Program of Strengthening Financial Stability of Banking Sector of the Republic of Kazakhstan (the "Program").

In accordance with the terms of the Program, 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge)

22. SUBORDINATED BONDS, CONTINUED

Participation in the Program of Strengthening of the Banking Sector Financial Stability, continued

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 Program, 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 2019, the carrying amount of the Bonds is KZT 23,507 million (31 December 2018: KZT 22,561 million).

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

	Liabilities		Total
	Debt securities issued	Subordinated bonds	
Balance at 1 January 2018	17,366	75,605	92,971
Changes from financing cash flows			
Receipts from debt securities issued	54,230	-	54,230
Receipts from subordinated bonds	-	5,507	5,507
Repayment of subordinated bonds	-	(6,000)	(6,000)
Total changes from financing cash flows	54,230	(493)	53,737
Changes in carrying amount from recognition of discount	(1,554)	(3,193)	(4,747)
Other changes	209	429	638
Interest expense	(4,218)	(7,963)	(12,181)
Interest paid	4,552	7,669	12,221
Balance at 31 December 2018	70,585	72,054	142,639

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

	Liabilities		Total
	Debt securities issued	Subordinated bonds	
Balance at 1 January 2019	70,585	72,054	142,639
Changes from financing cash flows			
Receipts from debt securities issued	34,701	-	34,701
Repayment of debt securities issued	(21,701)	-	(21,701)
Receipts from subordinated bonds	-	400	400
Repayment of subordinated bonds	-	(11,879)	(11,879)
Total changes from financing cash flows	13,000	(11,479)	1,521
Changes in carrying amount from recognition of discount	(772)	(1,095)	(1,867)
Other changes	1,575	2,937	4,512
Interest expense	(8,960)	(7,637)	(16,597)
Interest paid	8,559	6,691	15,250
Balance at 31 December 2019	83,987	61,471	145,458

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge)

23. OTHER LIABILITIES

	31 December 2019	31 December 2018
Other financial liabilities:		
Liability arising from continuing involvement (Note 16(g))	103,082	30,904
Settlements on other liabilities	8,620	3,424
Liabilities in guarantees issued	7,764	7,933
Accrued commission expenses	462	504
Provisions for guarantees and letters of credit	112	125
	120,040	42,890
Other non-financial liabilities:		
Taxes payable other than income tax	732	666
Other non-financial liabilities	1,185	-
Total other liabilities	121,957	43,556

24. SHARE CAPITAL

As at 31 December 2019 the Bank's share capital is presented as follows:

	Authorised share capital	Unissued share capital	Placement of authorised ordinary shares	Repurchased share capital from shareholders	Total share capital
Ordinary shares, items	995,876,753	(833,419,953)	3,181,111	-	165,637,911
Preference shares, items	39,249,255	-	-	(38,953,841)	295,414

3,181,111 ordinary shares for the total amount of KZT 954 million were placed in March 2019, with a placing price of KZT 300 per share.

As at 31 December 2018 the Bank's share capital is presented as follows:

	Authorised share capital	Unissued share capital	Repurchased share capital from shareholders	Total share capital
Ordinary shares	995,876,753	(833,419,953)	-	162,456,800
Preference shares	39,249,255	-	(38,953,841)	295,414

As at 31 December 2019 the Bank's share capital comprised:

	Authorized and issued share capital	Placement of authorised ordinary shares	Total
Ordinary shares	58,081	954	59,035
Preference shares	89	-	89
	58,170	954	59,124

As at 31 December 2018 the Bank's share capital comprised:

	Authorized and issued share capital	Repurchased shares	Total
Ordinary shares	58,081	-	58,081
Preference shares	11,775	(11,686)	89
	69,856	(11,686)	58,170

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 payments are made on the basis of financial results for the year. Distributable reserves are subject to rules and regulations of the Republic of Kazakhstan.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge)

24. SHARE CAPITAL, CONTINUED

Terms of preference shares required that the Bank pays dividends per one preference share as follows:
 $R = (b + 3.5\%) \times 300$, 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 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 2019 Quantity (in thousands)	For the year ended 31 December 2018 Quantity (in thousands)
Preference shares, beginning of the year	39,249	39,249
Preference shares purchased	(38,954)	(38,954)
Preference shares, end of the year	295	295
Ordinary shares, beginning of the year	162,457	162,457
Placement of authorised ordinary shares	3,181	-
Ordinary shares, end of the year	165,638	162,457

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”) dated 31 January 2011 (that became invalid in 2013), the Bank was obligated to establish a reserve capital by transferring an amount from retained earnings to provision for future expected losses.

As at 31 December 2019, 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 2018: KZT 4,981 million). During twelve months ended 31 December 2018, the Bank utilised the accumulated reserve to recognise the effect of transition to IFRS 9.

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 2019 and 2018. 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 mortgages.
- 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge)

25. SEGMENT REPORTING, CONTINUED

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 intercompany 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 income tax assets and liabilities. 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.

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

	<u>Retail banking</u>	<u>Corporate banking</u>	<u>Investment banking</u>	<u>For the year ended 31 December 2019</u>
Interest income calculated using effective interest rate method	52,579	49,536	16,088	118,203
Interest expenses	(27,915)	(17,495)	(16,427)	(61,837)
Provision for credit losses allowance on interest-bearing assets	(17,126)	(25,411)	-	(42,537)
Net non-interest income	4,710	17,131	2,254	24,095
Operating expenses	(9,072)	(24,353)	(2,621)	(36,046)
Profit/(loss) before income tax	3,176	(592)	(706)	1,878
Segment assets*	429,377	851,185	174,509	1,455,071
Segment liabilities*	567,940	546,011	220,896	1,334,847
Other segment items				
Depreciation charge on property, equipment and intangible assets	(769)	(1,942)	(155)	(2,866)
Loans to customers and banks	427,685	598,686	-	1,026,371
Customer and bank accounts	544,463	414,774	-	959,237
Financial guarantees and credit related commitments	-	138,821	-	138,821

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

	<u>Retail banking</u>	<u>Corporate banking</u>	<u>Investment banking</u>	<u>For the year ended 31 December 2018</u>
Interest income calculated using effective interest rate method	49,844	42,732	16,904	109,480
Other interest income	-	-	224	224
Interest expenses	(27,291)	(31,859)	(6,356)	(65,506)
Provision for credit losses allowance on interest-bearing assets	(10,302)	(20,512)	-	(30,814)
Net non-interest income	6,649	17,614	3,513	27,776
Operating expenses	(14,144)	(14,053)	(948)	(29,145)
Profit/(loss) before income tax	4,756	(6,078)	13,337	12,015
Segment assets*	394,466	935,718	183,280	1,513,464
Segment liabilities*	602,230	586,275	210,260	1,398,765
Other segment items				
Depreciation charge on property, equipment and intangible assets	(1,095)	(1,199)	(86)	(2,380)
Loans to customers and banks	393,153	618,060	-	1,011,213
Customer and bank accounts	583,807	494,272	-	1,078,079
Financial guarantees and loan commitments	-	154,019	-	154,019

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

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge, unless otherwise stated)

25. SEGMENT REPORTING, CONTINUED

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.

Information on large customers

For the year ended 31 December 2019 the reporting segments have no corporate and retail customers (for the year ended 31 December 2018: five customers), whose income from transactions individually exceed 10% of the total income of the Bank.

26. RISK MANAGEMENT POLICY

(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.

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 is 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 policy has the following objectives: to identify, analyse and manage risks faced by the Bank, establish limits on risk levels and relevant controls, and continuously assess levels of risks and ensure that exposure to risks stays within the established 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 2019, 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 authorised management bodies of the Bank in accordance with regulations and recommendations issued by the NBRK.

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 Department and Department of Credit Risks) 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge, unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(b) Risk management policies and procedures, continued

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.

(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 2019 and 2018 is as follows:

	2019		2018	
	Profit or loss KZT mln	Equity KZT mln	Profit or loss KZT mln	Equity KZT mln
100 bp parallel fall	(1,101)	(1,101)	1,065	1,065
100 bp parallel rise	1,101	1,101	(1,065)	(1,065)

An analysis of the sensitivity of net 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, based on positions existing as at 31 December 2019 and 2018 and a simplified scenario of a 150 bp symmetrical fall or rise in all yield curves, is as follows:

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of Kazakhstani tenge, unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(c) Market risk, continued

(i) Interest rate risk, continued

Interest rate sensitivity analysis, continued

	2019		2018	
	Profit or loss KZT mln	Equity KZT mln	Profit or loss KZT mln	Equity KZT mln
150 bp parallel rise	-	(4,120)	(850)	(7,741)
150 bp parallel fall	-	4,411	1,093	8,548

(ii) Currency risk

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

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

The Treasury Department performs currency risk management through management of open currency position, which enables the Bank to minimize losses from significant fluctuations of exchange rates of national and foreign currencies. The Risk Department 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.

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

	KZT	USD	EUR	Other Currency	31 December 2019
		USD 1 = KZT 382.59	EUR 1 = KZT 429		Total
Financial assets:					
Cash and cash equivalents	38,114	103,930	11,716	4,896	158,656
Investment securities measured at fair value through other comprehensive income	100,982	59,537	21	-	160,540
Investment financial assets at amortised cost	2,529	-	-	-	2,529
Due from banks	5,957	3,145	-	-	9,102
Loans to customers and banks	825,455	190,200	10,716	-	1,026,371
Other financial assets	8,623	4,688	213	11	13,535
Total financial assets	981,660	361,500	22,666	4,907	1,370,733
Financial liabilities:					
Due to banks and financial institutions	74,413	33,697	85	-	108,195
Customer and banks accounts	608,599	323,922	22,388	4,328	959,237
Debt securities issued	79,001	4,986	-	-	83,987
Subordinated bonds	61,471	-	-	-	61,471
Other financial liabilities	114,329	5,380	202	129	120,040
Total financial liabilities	937,813	367,985	22,675	4,457	1,332,930
Open position	43,847	(6,485)	(9)	450	37,803

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(c) Market risk, continued

(ii) Currency risk, continued

Derivative financial instruments and spot contracts

The Bank's exposure to foreign currency exchange rate risk as at 31 December 2018 is presented in the table below:

	KZT	USD USD 1 = KZT 384.2	EUR EUR 1 = KZT 439.37	Other Currency	31 December 2018 Total
Financial assets:					
Cash and cash equivalents	38,426	124,433	7,141	5,235	175,235
Investment securities at FVOCI	61,318	109,099	459	-	170,876
Investment financial assets at amortised cost	6,911	-	-	-	6,911
Due from banks	1,853	27,011	2,428	-	31,292
Loans to customers and banks	787,244	212,539	11,008	422	1,011,213
Other financial assets	4,702	5,944	113	29	10,788
Total financial assets	900,454	479,026	21,149	5,686	1,406,315
Financial liabilities:					
Due to banks and financial institutions	80,624	41,197	-	2	121,823
Customer and banks accounts	589,022	462,304	21,026	5,727	1,078,079
Debt securities issued	70,585	-	-	-	70,585
Subordinated bonds	72,054	-	-	-	72,054
Other financial liabilities	36,836	5,966	60	28	42,890
Total financial liabilities	849,121	509,467	21,086	5,757	1,385,431
Open position	51,333	(30,441)	63	(71)	20,884

The currency risk analysis by types of derivative financial instruments and spot contracts as at 31 December 2018 is presented in the following table:

	KZT	USD USD 1 = KZT 384.2	EUR EUR 1 = KZT 439.37	Other Currency	31 December 2018 Total
Accounts receivable on spot and derivative contracts	11,111	50,330	-	-	61,441
Accounts payable on spot and derivative contracts	(23,496)	(23,436)	-	-	(46,932)
Net spot and derivative financial instruments position	(12,385)	26,894	-	-	14,509
Open position	38,948	(3,547)	63	(71)	

A weakening of the KZT, as indicated below, against the following currencies at 31 December 2019 and 2018, 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(c) Market risk, continued

(ii) Currency risk, continued

Derivative financial instruments and spot contracts, continued

	2019	2018
20% appreciation of USD against KZT (2018: 10%)	(1,038)	(284)
20% appreciation of EUR against KZT (2018: 10%)	(1)	5
20% appreciation of other currencies against KZT (2018: 10%)	72	(6)

(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 movements in market prices are determined with reference to market data from at least the last 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 upon 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(c) Market risk, continued

(iii) Other price risk, continued

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 2019	31 December 2018
Foreign exchange risk	305	2,070
	<u>305</u>	<u>2,070</u>

(d) Credit risk

Credit risk is the risk of financial loss to the Bank if a customer or counterparty to a financial instrument fails to meet its contractual obligations. 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 Management Board and the Board of Directors.

The credit policy establishes:

- procedures for review and approval of 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 Credit Risk Department 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(d) Credit risk, continued

Scoring models, continued

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 models as a statistical model used for quantitative assessment of future creditworthiness of new and existing borrowers of the Group. 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 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.

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

	<u>2019</u>	<u>2018</u>
ASSETS		
Cash and cash equivalents	93,208	123,318
Financial instruments at fair value through profit or loss	-	27,177
Investment financial assets at FVOCI - debt financial instruments	160,177	170,719
Investment financial assets at amortised cost	2,529	6,911
Available-for-sale investments	-	-
Due from banks	9,102	31,292
Loans to customers and banks	1,026,371	1,011,213
Other financial assets	13,535	10,788
Total maximum exposure	<u>1,304,922</u>	<u>1,381,418</u>

For the analysis of collateral held against loans to customers and concentration of credit risk in respect of loans to customers, see Note 18.

The maximum exposure to credit risk from unrecognised contractual commitments at the reporting date is presented in Note 30.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(d) Credit risk, continued

Scoring models, continued

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 2019 and 31 December 2018 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 2019 and 31 December 2018 was in compliance with the statutory norm.

As at 31 December 2019 the Bank has 6 debtors or groups of connected debtors (31 December 2018: 14 debtors or groups of related debtors), credit risk exposure to whom exceeds 10 percent maximum credit risk exposure. The credit risk exposure for these customers as at 31 December 2019 is KZT 186,215 million (31 December 2018: KZT 339,579 million).

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, 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 transactions upon the counterparty's failure to post collateral.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (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 table below shows financial assets and financial liabilities subject to offsetting, enforceable master netting arrangements and similar arrangements as at 31 December 2019:

Types of financial assets/liabilities	Gross amounts of recognised financial asset/liability	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	58,777	-	58,777	-	(8,746)	50,031
Loans under reverse repurchase agreements	53,051	-	53,051	(53,051)	-	-
Total financial assets	111,828	-	111,828	(53,051)	(8,746)	50,031
Current accounts and deposits from customers	8,746	-	8,746	(8,746)	-	-
Total financial liabilities	8,746	-	8,746	(8,746)	-	-

The table below shows financial assets and financial liabilities subject to offsetting, enforceable master netting arrangements and similar arrangements as at 31 December 2018:

Types of financial assets/liabilities	Gross amounts of recognised financial asset/liability	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	59,641	-	59,641	-	(7,725)	51,916
Loans under reverse repurchase agreements	66,041	-	66,041	(66,041)	-	-
Total financial assets	125,682	-	125,682	(66,041)	(7,725)	51,916
Current accounts and deposits from customers	7,725	-	7,725	(7,725)	-	-
Total financial liabilities	7,725	-	7,725	(7,725)	-	-

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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (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 securities lent under agreements to repurchase (Note 15) represent the transferred financial assets, which are not completely 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.

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:

				31 December
	Kazakhstan	Non-OECD countries	OECD countries	2019 Total
Financial assets:				
Cash and cash equivalents	118,862	928	38,866	158,656
Investment financial assets at FVOCI	142,156	8,604	9,780	160,540
Investment financial assets at amortised cost	2,529	-	-	2,529
Due from banks	5,957	-	3,145	9,102
Loans to customers and banks	1,012,420	13,951	-	1,026,371
Other financial assets	13,535	-	-	13,535
Total financial assets	1,295,459	23,483	51,791	1,370,733
Financial liabilities:				
Due to banks and financial institutions	56,199	4,110	47,886	108,195
Customer and banks accounts	948,345	5,333	5,559	959,237
Debt securities issued	83,987	-	-	83,987
Subordinated bonds	61,471	-	-	61,471
Other financial liabilities	120,040	-	-	120,040
Total financial liabilities	1,270,042	9,443	53,445	1,332,930
Open position	25,417	14,040	(1,654)	

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(d) Credit risk, continued

Geographical concentration, continued

				31 December
	Kazakhstan	Non-OECD countries	OECD countries	2018 Total
Financial assets:				
Cash and cash equivalents	155,511	4,995	14,729	175,235
Financial instruments at FVTPL	27,177	-	-	27,177
Investment financial assets at FVOCI	148,774	18,121	3,981	170,876
Investment financial assets at amortised cost	6,911	-	-	6,911
Due from banks	27,415	-	3,877	31,292
Loans to customers and banks	1,010,008	1,204	1	1,011,213
Other financial assets	10,788	-	-	10,788
Total financial assets	1,386,584	24,320	22,588	1,433,492
Financial liabilities:				
Financial instruments at FVTPL	12,668	-	-	12,668
Due to banks and financial institutions	65,127	8,326	48,370	121,823
Customer and banks accounts	1,078,079	-	-	1,078,079
Debt securities issued	70,585	-	-	70,585
Subordinated bonds	72,054	-	-	72,054
Other financial liabilities	42,890	-	-	42,890
Total financial liabilities	1,341,403	8,326	48,370	1,398,099
Open position	45,181	15,994	(25,782)	-

(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. 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 Department performs monitoring of liquidity ratios.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(e) Liquidity risk, continued

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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(e) Liquidity risk, continued

31 December 2019	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 2019 Total
Financial assets							
Cash and cash equivalents	2.50%	-	5,662	-	-	-	5,662
Investment financial assets measured at FVOCI	5.63%	160,177	-	-	-	-	160,177
Investment financial assets measured at amortised cost	6.15%	-	211	2,318	-	-	2,529
Loans to customers and banks	11.50%	101,246	52,659	183,565	401,244	287,657	1,026,371
Total interest-bearing financial assets		261,423	58,532	185,883	401,244	287,657	1,194,739
Cash and cash equivalents		152,994	-	-	-	-	152,994
Investment financial assets measured at FVOCI		363	-	-	-	-	363
Due from banks		9,102	-	-	-	-	9,102
Other financial assets		13,535	-	-	-	-	13,535
Total financial assets		437,417	58,532	185,883	401,244	287,657	1,370,733
Financial liabilities							
Due to banks and financial institutions	6.12%	34,383	1,298	25,325	9,923	31,899	102,828
Customer and banks accounts	6.16%	39,932	60,664	284,524	276,448	17,499	679,067
Debt securities issued	9.91%	-	1,164	51	28,664	54,108	83,987
Subordinated bonds	11.75%	-	560	508	16,485	43,918	61,471
Other financial liabilities	3.00%	856	1,122	2,667	16,945	81,492	103,082
Total interest-bearing liabilities		75,171	64,808	313,075	348,465	228,916	1,030,435
Due to banks and financial institutions		5,367	-	-	-	-	5,367
Customer and banks accounts		274,086	1	4,111	379	1,593	280,170
Other financial liabilities		16,958	-	-	-	-	16,958
Total financial liabilities		371,582	64,809	317,186	348,844	230,509	1,332,930
Liquidity gap		65,835	(6,277)	(131,303)	52,400	57,148	
Interest sensitivity gap		186,252	(6,276)	(127,192)	52,779	58,741	
Cumulative interest sensitivity gap		186,252	179,976	52,784	105,563	164,304	
Cumulative interest sensitivity gap as a percentage of total financial assets		15.59%	15.06%	4.42%	8.84%	13.75%	

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(e) Liquidity risk, continued

31 December 2018	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 2018 Total
Financial assets							
Cash and cash equivalents	2.84%	3,910	2,254	-	-	-	6,164
Financial instruments at measured fair value through profit or loss	8.77%	27,177	-	-	-	-	27,177
Investment financial assets measured at FVOCI	4.15%	170,719	-	-	-	-	170,719
Investment financial assets measured at amortised cost	6.37%	-	-	4,436	2,475	-	6,911
Due from banks	2.60%	7,978	19,610	-	-	-	27,588
Loans to customers and banks	11.84%	104,507	50,486	201,520	341,522	313,178	1,011,213
Total interest-bearing financial assets		314,291	72,350	205,956	343,997	313,178	1,249,772
Cash and cash equivalents		169,071	-	-	-	-	169,071
Investment financial assets measured at FVOCI		157	-	-	-	-	157
Due from banks		3,704	-	-	-	-	3,704
Other financial assets		10,788	-	-	-	-	10,788
Total financial assets		498,011	72,350	205,956	343,997	313,178	1,433,492
Financial liabilities							
Financial instruments measured at fair value through profit or loss	3.00%	12,668	-	-	-	-	12,668
Due to banks and financial institutions	6.42%	33,336	1,567	19,240	42,048	15,431	111,622
Customer and banks accounts	5.83%	84,415	54,956	297,686	309,863	20,360	767,280
Debt securities issued	8.62%	-	1,108	21,292	23,043	25,142	70,585
Subordinated bonds	11.09%	-	550	12,473	8,352	50,679	72,054
Other financial liabilities	3.00%	166	216	655	4,125	25,742	30,904
Total interest-bearing liabilities		130,585	58,397	351,346	387,431	137,354	1,065,113
Due to banks and financial institutions		10,201	-	-	-	-	10,201
Customer and banks accounts		302,945	7	5,420	524	1,903	310,799
Other financial liabilities		11,986	-	-	-	-	11,986
Total financial liabilities		455,717	58,404	356,766	387,955	139,257	1,398,099
Liquidity gap		42,294	13,946	(150,810)	(43,958)	173,921	
Interest sensitivity gap		183,706	13,953	(145,390)	(43,434)	175,824	
Cumulative interest sensitivity gap		183,706	197,659	52,269	8,835	184,659	
Cumulative interest sensitivity gap as a percentage of total financial assets		14.70%	15.82%	4.18%	0.71%	14.78%	

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(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 customers 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 2019 Total
Financial liabilities:						
Due to banks and financial institutions	34,426	1,769	29,266	10,982	43,107	119,550
Customer and banks accounts	45,943	65,896	299,979	284,623	17,295	713,736
Debt securities issued	-	1,785	6,608	57,785	63,321	129,499
Subordinated bonds	-	1,108	4,857	39,791	102,629	148,385
Other financial liabilities	866	1,509	4,388	26,101	108,437	141,301
Total interest-bearing liabilities	81,235	72,067	345,098	419,282	334,789	1,252,471
Due to banks and financial institutions	5,367	-	-	-	-	5,367
Customer and banks accounts	274,086	1	4,111	379	1,593	280,170
Other financial liabilities	16,958	-	-	-	-	16,958
Total financial liabilities	377,646	72,068	349,209	419,661	336,382	1,554,966
Financial guarantees and commitments	138,821	-	-	-	-	138,821

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019
(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 2018 Total
Financial liabilities:						
Due to banks and financial institutions	33,378	2,136	22,234	46,535	20,853	125,136
Customer and banks accounts	86,312	56,190	304,374	316,824	20,817	784,517
Debt securities issued	-	1,681	25,441	42,204	33,691	103,017
Subordinated bonds	-	1,088	17,677	29,608	80,491	128,864
Other financial liabilities	244	370	1,334	7,467	33,295	42,710
Total interest-bearing liabilities	119,934	61,465	371,060	442,638	189,147	1,184,244
Due to banks and financial institutions	10,201	-	-	-	-	10,201
Customer and banks accounts	302,945	7	5,420	524	1,903	310,799
Other financial liabilities	11,986	-	-	-	-	11,986
Total financial liabilities	445,066	61,472	376,480	443,162	191,050	1,517,230
Financial guarantees and commitments	154,019	-	-	-	-	154,019
Derivative financial instruments						
<i>Gross settled derivatives</i>						
- Inflow	-	-	23,816	-	-	23,816
- Outflow	-	-	(11,111)	-	-	(11,111)

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

Derivative financial instruments

Contractual payments for derivative financial instruments are determined based on gross settlements due to initial and final exchange of notional amounts and applicable interest rates in accordance with the terms of these financial instruments.

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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of Kazakhstani tenge unless otherwise stated)

26. RISK MANAGEMENT POLICY, CONTINUED

(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 facts 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 of 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 as at 31 December 2019 (total capital is the sum of tier 1 and tier 2 capital less positive difference between retail deposits and statutory capital multiplied by 5.5, and less 33.33% of the positive difference between regulatory credit loss allowance and IFRS credit loss allowance as at 31 December 2018).

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

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

27. CAPITAL MANAGEMENT, CONTINUED

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 2019 the minimum level of ratios as applicable to the Bank are as follows:

- k1 – not less than 0.075 (31 December 2018: 0.075);
- k1-2 – not less than 0.085 (31 December 2018: 0.085);
- k2 – not less than 0.100 (31 December 2018: 0.100).

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 2019, the Bank complied with all prudential capital ratios k1, k1-2 and k2, exclusive of the regulatory capital buffer, and the actual ratios were 0.094, 0.100 and 0.174 (31 December 2018: k1 - 0.087, k1-2 - 0.100 and k2 - 0.171).

As at 31 December 2019, the regulatory capital buffer was 2%, and k1, k1-2 and k2 ratios, including the regulatory capital buffer were 9.5, 10.5% and 12%, respectively. In order to comply with the capitalisation ratios, including the regulatory capital buffer, the Agency for Regulation and Development of the Financial Market of the Republic of Kazakhstan has agreed on the Action Plan to satisfy the capital adequacy ratios, including the regulatory capital buffer.

The following table shows the composition of the capital position as at 31 December 2019 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 September 13, 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

27. CAPITAL MANAGEMENT, CONTINUED

	31 December 2019	31 December 2018
Tier 1 capital		
Basic capital:	108,564	102,067
Share capital	58,932	57,977
Statutory retained earnings of prior years	46,575	33,104
Retained earnings of current period	1,497	13,215
Reserves formed from statutory retained earnings of prior years	4,981	4,981
Revaluation surplus for buildings	1,442	1,564
Revaluation reserve of investment securities	285	(3,708)
Statutory adjustments:		
Intangible assets including goodwill	(5,148)	(5,066)
Total basic capital	108,564	102,067
Additional capital		
Paid-in preference share capital not satisfying basic capital requirements	11,775	5,887
Bank's treasury preference shares	(11,686)	(5,843)
Perpetual financial instruments obtained before 1 January 2015 (20% of carrying amount - in 2019, 50% - in 2018)	6,186	15,531
Tier 1 capital	114,839	117,642
Tier 2 capital		
Subordinated debt	82,154	81,754
Subordinated debt placed before 1 January 2015 denominated in KZT	3,167	12,670
Total tier 2 capital	85,321	94,424
Statutory adjustments:		
(2018: 33.33% of the positive difference between regulatory credit loss allowance and IFRS credit loss allowance)	-	(11,511)
Total capital	200,160	200,555
Positive difference between regulatory credit loss allowance and IFRS credit loss allowance	(22,923)	n/a
Risk-weighted assets, contingent liabilities and derivative financial instruments and operational risk		
Credit risk-weighted assets	985,438	993,520
Credit risk-weighted contingent liabilities	105,085	114,948
Market risk-weighted assets, contingent assets and liabilities	11,686	19,777
Operational risk	49,380	44,136
Risk-weighted assets, contingent liabilities and derivative financial instruments and operational risk	1,151,589	1,172,381
k1	0.094	0.087
k1-2	0.100	0.100
k2	0.174	0.171

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

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.

As at 31 December 2019 and 31 December 2018, the nominal values or contractual values and risk-weighted amounts are as follows:

	31 December 2019		31 December 2018	
	Nominal value	Risk-weighted value	Nominal value	Risk-weighted value
Guarantees issued and other similar liabilities	132,543	75,407	145,936	138,490
Letters of credit and other contingent liabilities related to other transaction	6,278	1,256	8,083	1,617
	138,821	76,663	154,019	140,107

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 2019, the guarantees issued in the amount of KZT 128,089 million are classified as Stage 1 (31 December 2018: KZT 140,783 million), KZT 3,479 million and KZT 975 million are classified as Stages 2 and 3, respectively (31 December 2018: KZT 958 million and KZT 4,195 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 2019	31 December 2018
Real estate	12,899	52,407
Unsecured	4,930	27,675
Cash	57,136	14,373
Corporate guarantees	12,169	10,371
Movable property	219	7,446
Goods in turnover	200	12,255
Accounts receivable	-	421
Land	-	42
Other	44,990	20,946
Total	132,543	145,936

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 2019	31 December 2018
Cash	6,278	8,083
Total	6,278	8,083

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

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

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 2019	31 December 2018
Securities	266,434	227,078
Investments in buildings, machinery, equipment, transport and other property	6,597	19,791
Unit investment funds	22	23
Bank deposits	373	-
Other assets	20	688
Total fiduciary assets	273,446	247,580

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 its property or relating to Bank's 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 the Bank's operations and financial position.

(b) Litigation

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

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

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

(a) Accounting classification and fair value

The table below sets out the carrying amounts and fair values of financial assets and financial liabilities as at 31 December 2019:

	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	-	-	158,656	158,656	158,656
Investment financial assets at FVOCI	-	160,540	-	160,540	160,540
Investment financial assets at amortised cost	-	-	2,529	2,529	2,446
Due from banks	-	-	9,102	9,102	9,102
Loans to customers and banks	-	-	1,026,371	1,026,371	1,019,337
Other financial assets	-	-	13,535	13,535	13,535
	-	160,540	1,210,193	1,370,733	1,363,616
Due to banks and financial institutions	-	-	108,195	108,195	108,195
Customer and banks accounts	-	-	959,237	959,237	957,859
Debt securities issued	-	-	83,987	83,987	78,240
Subordinated bonds	-	-	61,471	61,471	57,858
Other financial liabilities	-	-	120,040	120,040	120,040
	-	-	1,332,930	1,332,930	1,322,192

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(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 2018:

	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	-	-	175,235	175,235	175,235
Financial instruments at fair value through profit or loss	27,177	-	-	27,177	27,177
Investment financial assets at FVOCI	-	170,876	-	170,876	170,876
Investment financial assets at amortised cost	-	-	6,911	6,911	6,911
Due from banks	-	-	31,292	31,292	31,292
Loans to customers and banks	-	-	1,011,213	1,011,213	1,000,081
Other financial assets	-	-	10,788	10,788	10,788
	27,177	170,876	1,235,439	1,433,492	1,422,360
Financial instruments at fair value through profit or loss	12,668	-	-	12,668	12,668
Due to banks and financial institutions	-	-	121,823	121,823	121,823
Customer and banks accounts	-	-	1,078,079	1,078,079	1,076,661
Debt securities issued	-	-	70,585	70,585	64,549
Subordinated bonds	-	-	72,054	72,054	64,989
Other financial liabilities	-	-	42,890	42,890	42,890
	12,668	-	1,385,431	1,398,099	1,383,580

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(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 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 determination 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 and 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 4.4 – 12.9% and 6.0 – 18.8% are used for discounting future cash flows from loans to corporate customers and loans to retail customers, respectively;
- discount rates of 1 – 7.2% and 1.2 – 9.4% are used to calculate expected future cash flows from current accounts and deposits of corporate and retail customers;
- 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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of Kazakhstani tenge unless otherwise stated)

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

(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.
- Level 3: Valuation techniques using significant 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 2019, by the level in the fair value hierarchy into which the fair value measurement is categorised:

	Level 1	Level 2	Level 3	Total
Investment financial assets at FVOCI - debt financial instruments	43,990	116,550	-	160,540
	43,990	116,550	-	160,540

The table below analyses financial instruments measured at fair value at 31 December 2018, by the level in the fair value hierarchy into which the fair value measurement is categorised:

	Level 1	Level 2	Level 3	Total
Financial instruments at fair value through profit or loss				
- Derivative assets	-	-	27,177	27,177
- Derivative liabilities	-	-	(12,668)	(12,668)
Investment financial assets at FVOCI - debt financial instruments	58,874	111,845	-	170,719
	58,874	111,845	14,509	185,228

During 2019, due to changes in market conditions for a number of investment securities, quoted prices for these securities were not available in an active market. However, there was sufficient information to measure the fair value of these securities based on observable inputs. Therefore, these securities with carrying amount of KZT 111,845 thousand were transferred from Level 1 to Level 2 of the fair value hierarchy.

Unobservable valuation differences on initial recognition

Transaction price in the market, in which swaps transaction are entered into with NBRK may differ from the fair value of swap instruments in primary markets. Upon initial recognition the Bank measures fair value of swap transactions entered into with NBRK using the valuation technique.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(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

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).

The reconciliation of Level 3 fair value measurements of financial assets is presented as follows:

	Derivative financial assets	Derivative financial liabilities
1 January 2018	19,495	(9,199)
Total gains/(losses) recognised in profit or loss:		
Settlements	7,682	(3,469)
	-	-
31 December 2018	27,177	(12,668)
Total (losses)/gains recognised in profit or loss:		
Settlements	449	702
	(27,626)	11,966
31 December 2019	-	-

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 2019:

	Level 2	Level 3	Total fair values	Total carrying amount
Assets				
Cash and cash equivalents	158,656	-	158,656	158,656
Due from banks	9,102	-	9,102	9,102
Loans to customers and banks	832,641	186,696	1,019,337	1,026,371
Other financial assets	13,535	-	13,535	13,535
Liabilities				
Customer and banks accounts	108,195	-	108,195	108,195
Due to banks and financial institutions	957,859	-	957,859	959,237
Debt securities issued	78,240	-	78,240	83,987
Subordinated bonds	57,858	-	57,858	61,471
Other financial liabilities	120,040	-	120,040	120,040

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (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 2018:

	Level 2	Level 3	Total fair values	Total carrying amount
Assets				
Cash and cash equivalents	175,235	-	175,235	175,235
Due from banks	31,292	-	31,292	31,292
Loans to customers and banks	784,565	215,516	1,000,081	1,011,213
Other financial assets	10,788	-	10,788	10,788
Liabilities				
Customer and banks accounts	1,076,661	-	1,076,661	1,078,079
Due to banks and financial institutions	121,823	-	121,823	121,823
Debt securities issued	64,549	-	64,549	70,585
Subordinated bonds	64,989	-	64,989	72,054
Other financial liabilities	42,890	-	42,890	42,890

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 2019		31 December 2018	
	Related party transactions	Average interest rate	Related party transactions	Average interest rate
Investments in subsidiaries	25,374		23,251	
- subsidiaries				
- in KZT	25,374	-	23,251	-
Loans to customers and banks, gross	106,676		83,802	
- key management personnel of the Bank or its parent Bank				
- in KZT	47	2.95%	56	3.66%
- close relatives of key management personnel				
- in KZT	52	6%	81	12.83%
- subsidiaries				
- in USD	7,473	3.5%	21,276	3.5%
- in KZT	79,789	0.1%	62,321	0.1%
- entities under common control				
- in USD	19,315	5.03%	-	-
- in KZT	-	-	68	16.26%
Provision for impairment on loans to customers and banks	(28,118)		(6,824)	
- close relatives of key management personnel	-	-	-	-
- subsidiaries	(6,765)	-	(6,824)	-
- entities under common control	(19)	-	-	-

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019 (in millions of Kazakhstani tenge unless otherwise stated)

32. RELATED PARTY TRANSACTIONS, CONTINUED

	31 December 2019		31 December 2018	
	Related party transactions	Average interest rate	Related party transactions	Average interest rate
Customer and banks accounts	6,487		15,475	
- key management personnel of the Bank or its parent Bank				
- in KZT	2,089	8.92%	221	11.17%
- in USD	-	-	640	1.27%
- close relatives of key management personnel				
- in KZT	2,135	1.23%	9,728	3.24%
- in USD	186	9.98%	744	9.10%
- subsidiaries				
- in KZT	329	2.62%	3,565	0.07%
- other				
- EUR	1,252	1.29%	577	5.30%
- in KZT	496	10.4%	-	-
Debt securities issued	3,188		438	
- subsidiaries				
- in KZT	2,046	9.00%	438	8%-9%
- shareholders				
- in USD	1,142	4.5%	-	-
Subordinated bonds	127		139	
- subsidiaries				
- in KZT	127	11.00%	139	7%-11%
Charter capital	1,160		570	
- subsidiaries				
- in KZT	1,160	-	570	-

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.

JOINT STOCK COMPANY BANK CENTERCREDIT

NOTES TO THE SEPARATE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31 DECEMBER 2019

(in millions of Kazakhstani tenge unless otherwise stated)

32. RELATED PARTY TRANSACTIONS, CONTINUED

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 2019 and 2018 are the following amounts, which arose due to transactions with related parties:

	For the year ended 31 December 2019	For the year ended 31 December 2018
Interest income	611	85
- key management personnel of the Bank	2	2
- close relatives of key management personnel	3	7
- subsidiaries	76	66
- entities under common control	530	10
Interest expense	(219)	(535)
- key management personnel of the Bank	(30)	(166)
- close relatives of key management personnel	(80)	(324)
- subsidiaries	(81)	(3)
- other	(28)	(42)
Fees and commissions income paid	-	8
- subsidiaries	-	8
Fees and commissions expenses	-	(18)
- subsidiaries	-	(18)
Other income	-	1,358
- subsidiaries	-	1,358
Operating expenses	(618)	(389)
- key management personnel of the Bank	(618)	(389)

Key management personnel remuneration for the years ended 31 December 2019 and 2018 represent short-term employee benefits. Total remuneration of members of the Board of Directors and the Management Board amounted to KZT 618 million and KZT 389 million, for the years ended 31 December 2019 and 2018, respectively.

33. SUBSEQUENT EVENTS

On 15 March 2020 the government of the Republic of Kazakhstan declared a state of emergency which has subsequently been extended to 30 April 2020 in response to the global COVID-19 virus pandemic. A number of restrictions on the movement of individuals within Kazakhstan have been imposed, in order to reduce the spread of the virus. This has reduced the normal economic activities of many businesses in the country.

Other governments across the world have imposed similar restrictions in order to limit the impact of the virus, resulting in a significant reduction in global economic activity.

Global oil prices also fell significantly in March 2020, and the Kazakhstan Tenge weakened against the USD from a rate of KZT 382.59 to one USD at 31 December 2019, to approximately 430.99 KZT to one USD at 27 April 2020.

Management of the Bank believes that the economic effects of the COVID-19 virus are likely to be significant both globally and in Kazakhstan. This may result in a contraction in economic activity, and a fall in asset prices in Kazakhstan. Management has analysed the potential impact of the Bank's financial position based on three stress test scenarios described in Note 2(d).

As part of the Bank's continued engagement in the Program for Improving Financial Stability of the Banking Sector of the Republic of Kazakhstan approved by the Resolution of the NBRK's Management Board and based on the results of the General Meeting of Shareholders dated 31 March 2020, it was decided to increase the number of authorised shares through issue of 215,263,858 ordinary shares.

Resolution of the Management Board of the NBRK dated 19 March 2020, No. 39, related to approval of the preferential lending programme, which provides for delivery of support measures to small and medium-size business entities and individual entrepreneurs affected by implementation of a state of emergency in the country as a result of spreading of coronavirus infection pandemic, the Bank has proceeded to application of funds provided by KSF JSC in the amount of KZT 71,000 million.