ALLIANZ BANK BULGARIA AD

ANNUAL ACTIVITY REPORT

CORPORATE MANAGEMENT DECLARATION

INDEPENDENT AUDITORS' REPORT

ANNUAL FINANCIAL STATEMENT

for the year ended 31 December 2020

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Dear Shareholders,

Welcome to the Annual General Assembly of the Shareholders of Allianz Bank Bulgaria AD.

During 2020 Allianz Bank Bulgaria AD continued to function as a loyal and honest partner of its clients and partners on the local and international markets.

Despite the challenges of the crisis caused by the announced COVID-19 pandemic and the serious competition, the Bank achieved good financial results due to its effective management and the excellent work of its employees.

In 2020, the Bank reached an amount of assets of BGN 3,280,609 thousand and realized a profit after tax of BGN 8,241 thousand.

Attracted funds

As of the end of 2020, customer deposits with the bank increased by 15.32% to reach BGN 2,983,881 thousand /2019: BGN 2,587,467 thousand).

Sources of financing the bank are deposits of citizens - BGN 1,615,322 thousand and deposits with corporate clients - BGN 1,368,559 thousand .

As of the end of 2020, Allianz Bank Bulgaria serves 24,225 corporate accounts and 186,884 personal accounts.

Capital

The main capital of Allianz Bank Bulgaria AD as at 31 December 2020 and 31 December 2019 was BGN 69,000 thousand, distributed in 69,000 thousand registered voting shares with a nominal value of BGN 1 each.

As at 31.12.2020 the Bank's equity is BGN 244,750 thousand. The total risk component of the bank's balance sheet and off-balance sheet assets is BGN 1,216,493 thousand. The capital base of the Bank, according to the new capital framework of the ECB / Basel 3 / with no annual profit for the end of 2020 is BGN 226,483 thousand.

The Bank prepares quarterly supervisory and monthly internal reports in accordance with the requirements of Ordinance No 8 of the Bulgarian National Bank (BNB) of 24 April 2014 on the capital buffers of banks. The Bank applies a standardized approach with regard to credit and market risk and a basic indicator approach since the beginning of 2007 for operating risk.

According to art. 92 of Regulation 575 of the European parliament and of the Council of Wednesday, June 26, 2013, minimum requirements for the ratios of capital adequacy of Tier 1 capital and of Total capital adequacy are respectively no less than 6% and no less than 8%. According to the Bank's Supervisory Reports prepared for BNB purposes in accordance with Regulation 575 of the European Parliament and of the Council of 31 December 2020, the Bank complies with capital adequacy requirements.

At the end of 2020, Allianz Bank Bulgaria AD complied with the recommendations of BNB (decision of the BNB MB of 20.12.2019 and 160/24.04.2019) for capital stability – that total capital adequacy should be no less than 14.25%, formed based on:

- Minimal capital adequacy ratio requirement for 8% of risk weighted assets in accordance of art. 92 §1 of Regulation 575/2013 and additional requirement for base share capital 0.25% of risk weighted assets, or 8.25% total capital requirement, according to The Supervisory Review and Evaluation Process (SREP; EBA/GL/2014/13).
- systemic risk buffer of 3% of risk weighted assets,
- safety capital buffer of 2.5% of risk weighted assets,
- countercyclical capital buffer of 0.5%, applicable for credit risk exposures in Bulgaria as of end of 2020, according to BNB decision due to COVID-19 crisis.

Assets

The bank's assets at the end of 2020 amounted to BGN 3,280,609 thousand, increasing by 13.74% for one year and accounting for 2.65% of the banking system assets as of 31.12.2020. The Bank's assets growth for the banking system 2020 was 8.59%.

There is no significant change in the structure of the assets and the main increase in total assets is due to increase in Cash and cash equivalents and Loans and advances to clients, with growth of 29.14% and 13.17% compared to 2019. A decrease is observed in Financial assets measured at amortized cost by 5.26%, having its share in total assets to 14.28% (compared to 2019 – 17.15%).

The loans and advances to customers as of December 31 may be presented as follows:

In BGN thousand	**2020**	**2019**
Loans and advances to clients at amortized cost	1,310,228	1,142,517
Factoring receivables	30,567	38,293
Claims from a cash pool	205,473	185,406
Receivables under a finance lease	83,369	65,819
Minus losses from impairment	(81,971)	(64,526)
Total loans and advances to clients	**1,547,666**	**1,367,509**

Under the new Basel III financial reporting framework (FINREP), loans over 90 days in arrears amounted to BGN 61,864 thousand (69,200 thousand in 2019)) and account for 3.80% of the Bank's loan portfolio (4.83% in 2019), with the analogous indicator for the entire banking system being as of 31.12.2020 - 7.45% and 6.38% for the 2nd group of banks.

Net financial revenue

In the past 2020, the Bank retained the proportions in the structure of net financial income, with net interest income and net fee and commission income remaining the main factor in profit formation.

The highest relative share of interest income is interest income on loans and advances to clients - BGN 40,416 thousand, which represents 70.57% of the total interest income, compared to 67.76% in the previous year. Interest income from investments is BGN 13,407 thousand and has a relative share of 22.80% (against 23.84% at the end of 2019).

Net fee and commission income amounted to BGN 13,677 thousand, accounting for a decrease compared to the end of 2019 – 15,324 thousand . Gross revenue from fees and commissions on cash and cash transfers for the same period decreased by 4.57%. Revenues from fees and commissions on loans, guarantees and letters of credit increase by 7.15%.

Net income from forex trading amounted to BGN 2,287 thousand, registering decrease of 10.45% compared to the end of the previous year.

Administrative costs

The operating expenses of the Bank for 2020 amounted to BGN 43,574 (2019 BGN 43,425 thousand), increasing only 0.34% compared to 2019.

Administrative costs (continued)

The personnel and wage costs increased by 3.33% compared to the end of 2019. The contribution to the Bank Restructuring Fund paid in 2020 amounts to BGN 6,167 thousand (2019 - BGN 5,615 thousand), having annual growth of 9.83%. The volume of funds intended to cover the contribution to the Deposit Insurance Fund of individuals was increased by 1.15% to BGN 3,694 thousand. (2019 - BGN 3,737 thousand).

The operating expenses for external services (including audit) and materials amounted to BGN 7,082 thousand and decreased by 3.94% compared to 2019.

Management, marketing and other expenses decreased by 5.62% to BGN 2,633 thousand.

In BGN thousand	**2020**	**2019**
Expenses for inventory	(430)	(453)
Expenditure on external services, incl. Audit	(6,652)	(6,901)
Management, marketing and other costs	(2,633)	(2,493)
Rental costs	(124)	(157)
Expenses for depreciation	(1,870)	(2,139)
Expenses for right of use depreciation	(3,449)	(3,234)
Staff expenses	(18,432)	(17,830)
Bank restructuring costs	(6,167)	(5,615)
Expenses for deposit guarantee	(3,694)	(3,737)
Other expenses	(123)	(866)
Total administrative costs	**(43,574)**	**(43,425)**

The Cost /Income ratio (Administrative costs/Gross operating result) at the end of 2020 was 60.65% compared to 56.59 in 2019. The 2021 plan is CIR 46.03%.

Information on services provided by the independent auditors

The amounts accrued in 2020 for services provided by registered auditors for statutory independent financial audit are as follows: for PricewaterhouseCoopers Audit OOD – BGN 145,000 excluding VAT and for HLB Bulgaria OOD - BGN 16,000 excluding VAT.

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For the audited period and on the date of this report PricewaterhouseCoopers Audit OOD provided, is in the process of providing or negotiating with the Bank, the following services:

- Joint mandatory statutory financial audit of the Bank's financial statements prepared for the year ended 31 December 2020, in accordance with IFRS adopted by the EU;
- Issuance of a report to the regulator for review of the organization of the Bank's internal control systems as at 31 December 2020, as required by Art. 76, para. 7, item 1 of the Credit Institutions Act and BNB Ordinance 14 of 4 February 2010 on the content of the audit report for supervisory purposes.

For the audited period and at the date of this report, HLB Bulgaria Ltd provided or is in the process of providing the following services:

Information on services provided by the independent auditors, (continued)

- Joint mandatory statutory financial audit of the Bank's financial statements prepared for the year ended 31 December 2020, in accordance with IFRS adopted by the EU;
- Issuance of a report to the regulator for review of the organization of the Bank's internal control systems as at 31 December 2020, as required by Art. 76, para. 7, item 1 of the Credit Institutions Act and BNB Ordinance 14 of 4 February 2010 on the content of the audit report for supervisory purposes.

Financial goals for 2021

The financial goals that the Bank should achieve in 2021 are in line with the macroeconomic situation for the country's development and the expected dynamics in the market environment, based on the Bank's approved plan by the Supervisory Board and the Planned Dialogue with Allianz CEE.

The Bank sets ambitious targets for the growth of profitable assets, as their planned amount at the end of the year amounts to BGN 2,625 million with a growth of 12.4%. This volume of business should generate a profit after taxes in the amount of BGN 30.8 million, which would provide a return on equity (ROE) of 12%.

The strategic plan of Allianz Bank Bulgaria AD covers a three-year period, and its final approval is carried out by the Board of Directors of Allianz CEE, a subsidiary of Allianz SE, managing the holding's business (Allianz Group) in Central and Eastern Europe.

The strategic goals of the Bank and the planned values of the main indicators for capital adequacy, liquidity and profitability reflect the vision of the shareholders and the Management for sustainable development of the Bank in the conditions of stable economic environment.

The Bank continues to follow the four main directions for strategic development set by the Allianz Group:

- Growth;
- Productivity;
- Technical perfection;
- Meritocracy: management by the knowledgeable and the capable. Priority focused on employees of the companies.

In fulfilling the financial goals set in 2021, the Bank will be focused on the implementation of the following priority projects:

- Changing the traditional business model by simplifying internal processes, creating fast procedures for distribution of banking products and digitization of the maximum number of services in order to provide quality, efficient and fast service that meets the needs of each client;

- Retail business - increasing the share in retail banking and enriching the product range with loans to the mass customer, characterized by fast resolution procedures and relatively higher interest rates, sustainable growth in mortgage lending, improving the quality of the portfolio;

- Corporate banking - Establishment of a "Customer Service Bureau" by international and multinational companies and increase of revenues from trade finance and factoring. Focus on attracting international, multinational and local export-oriented companies;

- Implementation of a digital banking platform with a selected provider Software Group BG;

Financial goals for 2021, (continued)

- Optimization of routine activities related to the internal process of attracting and lending to retail customers, as well as implementation of a new digital platform DiGiWave to support the transformation;

- Expanding the target group to the mass market for consumer loans with a focus on customers from the following specific segments (civil servants, employees of multinational companies, employees of AZBG customers, IT industry, etc.) Focus on customer retention measured by an improved ratio of the outflow of the existing ones (max. 15% of the average balance of the portfolio);

- Redesign of lending processes - shortening the loan approval and disbursement timing. Elimination of duplicate operational activities in order to facilitate and streamline processing. Introduction of quick solutions for standardized and low-risk transactions. Reducing the number of application forms and the full set of documents accompanying the process. Implementing effective sales control;

- Full digitalization of the lending process: Paperless workflow, interaction between all participants in a digital environment - front office, collateral assessors, legal function, risk; automation of document generation; built-in risk control and mechanisms for cross-control of new transactions;

- Integrated marketing communication - targeted direct marketing campaigns aimed at existing customers in order to cross-sell and retain existing customers. Effective marketing activities to attract new customers.

- Launch of cooperation with Euler Hermes, an insurance company specializing in the field of factoring transactions;

- Growth in the volume of bank loans intended for corporate clients with a high rating in order to achieve lower capital consumption.

In addition to the described goals and initiatives to achieve them, the Bank has adopted the concept of "MonoCARD", which involves cooperation with Mastercard, a single payment scheme combining all the benefits of the exclusive partnership agreement with opportunities for product development and subsidizing various initiatives, full marketing and consulting support, bonuses in case of covered business volumes and optimization of operating costs.

The vision of the Bank is to enter the top 10 banks in Bulgaria by offering innovative and competitive products and services and maintaining its high credit rating.

New products and services

In 2020, the Bank continued to maintain and optimize its product range in Retail Banking in order to consolidate the positions achieved.

In 2020, the cost of attracted resources in the banking system remained low at the same time, the price of credit for the same segment maintained its downward trend, but at a slower pace.

Over the past year, the competition in lending has deepened and loan conditions have been revised several times, both for mortgage and credit products for current consumption, in order to ensure their competitiveness.

New products and services, (continued)

In the Corporate Banking business line, the Bank's priority is the development of various corporate financial products to meet the growing needs for working capital and investment financing of companies, as well as the need to use transaction services. The focus in 2020 was on active sales and maintaining the purity of the corporate loan portfolio.

In view of the emergency situation resulting from the COVID-19 epidemic, measures have been taken to support and assist customers using credit services, such as the Moratorium on deferral and settlement of payments under credit agreements in connection with emergency measures for COVID-19, as well as a State aid scheme under the Portfolio Guarantee Program to support the liquidity of micro, small and medium-sized enterprises (SMEs) and large enterprises affected by the emergency and the COVID-19 epidemic, through the mediation of Bulgarian Development Bank AD.

We worked to increase revenues from fees and commissions and to create new opportunities for lending and attracting transactional business. Efforts were made to compensate for the lost income, as a result of the equalization of the prices of foreign currency transfers in BGN to those in EUR, made through the SEPA and TARGET 2 payment channels.

The Bank also focused on factoring services. The increased period of deferred payment between companies as a result of the COVID-crisis gives indications of significant potential for the development of these services in the next period.

The excess liquidity of the Bank, the tendency to increase the attracted funds from corporate clients, the pressure for low interest loans were noticeably visible in 2020 as well, which forced the Bank to pursue its restrictive interest rate policy on the current account resource.

In 2020, Allianz Bank grew in customer operations, with transactions carried out remotely accounting for 93%.

In 2020, the Bank signed a strategic partnership agreement with Mastercard and launched a campaign to replace Visa cards of all cardholders with Mastercard cards. In order to cover the entire range of customer segments, additional new products were certified and developed with the Mastercard brand as a business debit card for corporate customers and a package of cards for premium customers - Platinum Debit and Platinum Credit, which will be launched for customers in February 2021. To ensure higher security and in compliance with the regulations, we have introduced two-factor authentication for payments on the Internet with cards by using two passwords: static and dynamic. The bank now offers a new functionality of its ATM devices - depositing cash.

Sales network

In 2020, the process of optimization of the branch network of Allianz Bank Bulgaria AD continued as in the previous years.

Continuous monitoring and analysis of efficiency, workload and, last but not least, the potential for development of the sales points of the Bank are carried out. On the basis of the results of this process were closed Stara Zagora 2 FC, Tzar Simeon Veliki FC in Stara Zagora, Hristo Botev FC - Sofia, FC Tsar Simeon – Sofia, FC Svishtov, FC Jurnalist – Sofia and SFC Poligraphia – Sofia.

As at 31 December 2020, the Bank has 60 structural units, incl. Headquarters, 32 banking centers, 24 financial centers, 3 small financial centers located in 36 settlements in the country.

Information Technology

In the past 2020, the Bank continued to successfully develop the long-term project for digital transformation, launched in 2019, which is currently one of the main challenges in the banking sector. This project covers bringing the Bank in line with new technologies and new business models for more effective customer engagement through all channels. Within this project in 2020 were opened and implemented opening of clients and accounts through the new DigiWave platform, as well as were developed and implemented main processes of the leasing company, as well as the opportunity to work and offer new insurance products by employees of the Bank. Also, an opportunity for active management of its card portfolio by the Bank's clients was implemented and added to the Smart ID application.

Numerous modifications related to changes in the Bank's tariff and some products were introduced. The Bank's reporting system was diversified as all new current reporting forms of the BNB and the ECB related to changes in their requirements were developed in a new system.

In 2020, the AML system project was completed and implemented in the production environment, the existence of which is a regulatory requirement.

In 2020, the Bank purchased equipment for the expansion of the backup data center and the maximum was done so that in early 2021 the continuity of the predominant number of critical applications in the Bank to be ensured.

Regarding the technical infrastructure, the Bank also implemented a system for monitoring and management of information assets - nVision. A large part of the communication equipment in the main data center of the Bank was also replaced.

In the coming year, we will continue to develop information technologies implemented at the Bank to respond promptly to all changes in the country's regulatory and legal framework, business challenges and customer satisfaction through a secure, reliable and high-performance information system that meets world standards in the area. Our focus will be on prioritizing the digitalization of processes and services within the bank. This will facilitate customers both in terms of transactions and in the client-bank relationship as a whole.

Staff

At the end of 2020 Allianz Bank Bulgaria AD employs 594 employees on an employment contract (2019: 601 employees).

A key point during the past year was the restructuring of the bank’s Head office network , aiming at a simpler and flatter structure that meets the needs of business. During the year, internal trainings were conducted by managers at the Head Office of Allianz Bank Bulgaria, as well as trainings by external consultants and training companies with a focus on managerial skills and leadership. In the conditions of a pandemic of COVID-19, the bank focused on conducting the trainings mainly online.

The employees of Allianz Bank Bulgaria AD play a key role in the development of the Bank. They are the basis for the quality service of the clients and their satisfaction. The Bank pursues a policy of supporting the balance between work and private life, aiming at creating a productive and efficient work environment. It is appreciated and supported employees' willingness to develop and improve their qualifications and skills.

In order to successfully achieve its business strategy and goals, the Bank is dependent on keeping its best employees and keeping them motivated and committed. The approach is based on managing and evaluating talent, promoting inclusion and empowering employees and supporting well-being and commitment, backed by strategic HR frameworks, principles and tools built on the principles of excellent customer service, joint leadership, entrepreneurship and trust. The Bank values the commitment of its employees with high priority and works to build a customer-centric workforce.

Staff, (continued)

The Bank uses a specific IMEX index to measure the development of the company culture in which people and work matter, and the “Work Well Index” WWI to analyze the underlying causes of work-related stress to identify effective solutions and make changes to the work environment so that employees can reach their full potential.

IMIX includes 10 indicators covering areas of leadership, performance, and corporate culture.

The Bank supports social inclusion through diversity and well-being programs, supporting groups such as women in management and people with disabilities.

The results of the survey on employee satisfaction for 2020 showed an increase in the indexes for their engagement, development of company culture, work-life balance.

Credit, market, liquidity, and operating risk

The Bank manages the credit risk through rules and procedures related to the characteristics of the credit transactions concluded by it, the order, terms and manner of their research, analysis, evaluation, authorization, coordination, management and provision approved by the Bank's Management Board. actively manages its credit risk.

According to IFRS 9 requirements the Bank applies the “expected credit loss” (ECL) model. In this regard, the Bank applies substantial judgment on the way changes in economic factors are reflected in ECL, which is determined on a likelihood-weighted basis. The new impairment model is applied to the following financial assets which are not assessed by Fair value in profit and loss (FVPL):

- financial assets comprising debt instruments;
- lease receivables; and
- issued loan commitments and contracts for financial guarantee.

According to IFRS 9, impairment losses are not recognized for equity securities.

IFRS 9 requires recognition of a correction of losses amounting to ECL for 12 months and ECL for the entire duration of the instrument. ECL for the entire duration of the instrument is ECL arising from all possible cases of non-performance throughout the expected duration of a financial instrument, and ECL for 12 months is the part of ECL derived from cases of non-performance which may occur within 12 months after the reporting date.

According to the new standard, when recognizing the amount of ECL for a financial instrument, the Bank shall adhere to one of the following approaches:

General approach

The general approach to measuring of impairment is applied to all financial assets, credit commitments, and financial guarantees, lease receivables within the scope of impairment of IFRS 9, unless the simplified approach is applied.

According to the general approach, ECL is measured as 12-month expected credit losses or expected credit losses throughout the life depending on whether substantial increase of credit risk is present after initial recognition. More specifically:

Credit, market, liquidity, and operating risk, (continued)

According to the General approach, the Bank calculates 12-month or expected credit loss for the entire financial instrument (ECL) depending on the severity of change in the financial instrument's credit risk after initial recognition.

To this end, the Bank applies three Phases as described below:

- Phase 1 encompasses all new financial assets upon initial recognition and instruments which have not deteriorated substantially in credit quality after initial recognition;

- Phase 2 encompasses financial instruments which have deteriorated substantially in credit quality after their initial recognition, but which have no objective proof of event of credit loss;

- Phasee 3 encompasses financial assets which have objective proof of impairment at the reporting date. And finally, transfer of a financial instrument to Phase 3 is required if an impairment signal arises and is confirmed.

The Bank has defined in its rules and practice total correspondence between the definition of “non-performance", “impaired", and “non-performing” to ensure a homogeneous approach to practices for categorization of loans for supervisory and reporting purposes. As a result:

- Phase 1 and 2 include only performing financial assets,
- Phase 3 includes only non-performing financial assets.

Expected credit loss for 12 months is recognized for assets classified in Phase 1. Expected credit losses throughout their entire lifetime are recognized for financial assets classified in Phase 2. Expected credit losses throughout their entire lifetime are recognized for financial assets classified in Phase 2 and interest income is calculated based on net book value. For financial assets classified in Phase 3, the Bank stops recognizing balance-sheet interest.

Simplified approach

The simplified approach to measuring impairment is applied to all commercial receivables (including the factoring portfolio) and all cash funds.

As of 31.12.2020, non-performing exposures classified in Phase 3 amounted to BGN 61,864 thousand or 3.80% of the loan portfolio. The impairments accrued on them amount to BGN 45,690 thousand.

Applying the principle of full coverage of the risk of loss, the Bank charged as at 31.12.2020 provisions for exposures classified as serviced in Phase 1 and Phase 2 totaling BGN 37,795 thousand. The provisions based on the applicable accounting standards are determined on the basis of the adopted Provisioning Policy.

In order to limit the counterparty credit risk, the Bank uses a system of limits to local and foreign banks/ financial institutions/ corporate clients – established according to the definitions and logic embedded in the methodology for their calculation of the CRisP system. Limits are updated monthly and are available daily through the CRisP system. Disbursement of limits is monitored on a daily basis.

In addition to the system of limits and in order to minimize counterparty credit risk, when concluding repo transactions, the Bank also applies additional limits established in Minimum standards for repo transactions of companies within the Allianz SE group as follows:

Credit, market, liquidity, and operating risk, (continued)

Acceptable collaterals:

- Primary: State securities of countries and international development banks and organizations with minimum credit rating AAA, deposit with one-day maturity;
- Secondary: State securities of countries with a minimum credit rating of AA, A, and BBB, corporate (senior) securities with a minimum rating of A, deposit certificates from banks with a minimum rating of A, deposit with maturity up to three months, state guaranteed securities;
- Tertiary: Regular stock (with established requirements for free float, listed on established exchanges within the G7 and EU countries), convertible investment-grade bonds.

The following shall not be accepted as collateral: Commodities, loans, structured products such as (CDOs; CLOs; ABSs); properties, as well as shares of CIS investing in properties; variants; issued own issues of securities; any type of assets on emerging markets; exchange-traded funds (ETF), preference shares, subordinated term debt, collateral from issuers classified in “Watch” and “Restricted” lists in the CRisP system.

As at 31.12.2020, the majority of receivables from local and foreign banks are short-term (mostly overnight and up to 7-day deposits). Distribution of exposures to banks (deposits, repos, currency transactions, securities, and guarantees), according to credit rating from ECAA is as follows:

%	**Deposits**	**Nostro accounts**	**Securities**	**Repo transactions**	**Spot currency transactions (gross value)**
Investment grade	100%	100%	95.73%	-	100%
Speculative grade	-	-	4.27%	-	-
Without rating	-	-	-	-	-
Total	100%	100%	100%	-	100%

As of 31.12.2020 86.26% of the total allocated capital is for credit risk under regulatory framework Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms.

The Bank manages market risk through an appropriate organizational structure for identification, measurement, monitoring and management. The processes are documented and informationally secured. The assigned capital for operational risk at the end of 2019, calculated according to a standardized approach - basic indicator approach, according to Article 315 of the EU Regulation No 575/2013, is 13.47% of the total capital. There is also an administrative organization for recording and measuring potential operational risk losses.

The Bank owns a portfolio of liquid assets at the end of 2020 (in accordance with Ordinance No. 11 of the BNB on Liquidity Management in Banks) amounting to BGN 1,388,519 thousand, which allows it to maintain an appropriate balance between the maturity of the borrowed resource ongoing financing of its activities. Given that the secondary liquidity ratio recommended by BNB is no less than 20% (Liquid assets/ Attracted funds), the Bank had a secondary liquidity ratio of 45.97% at the end of 2020 and 42.66% on average for 2020.

Credit risk management in regard of COVID-19 pandemic

During the reporting year, the Bank's activities were affected by the global COVID-19 pandemic. In response to the global pandemic crisis COVID-19, the Parliament of the Republic of Bulgaria announced a resolution for declaring a state of emergency on the territory of Bulgaria effective from 13 March 2020. The restrictions introduced by the Measures and Actions during a State of Emergency Act, announced by resolution of the National Assembly on 13 March 2020 and their consequences limited the business activities in Bulgaria and had a negative impact on the business, the market participants, the Bank's clients, and the national and global economy.

The Moratorium measures were applied in 2020 and continue in March 2021.

The Bank has taken the required measures to guarantee the sustainability of the bank operations and to support its clients and employees, as follows:

- Establishment of adequate control measures concerning the spread of the infection at the workplace, which include a system of measures to reduce the transmission of the infection and employees' training;
- Triggering action plans for states of emergency, which include scenarios for pandemic and which provide measures for the specific phases of the pandemic development;
- Evaluating how quickly can be applied the measures designated in the pandemic scenario under states of emergency and how long can be maintained the Bank's operations under such scenario;
- Remote work and other flexible working conditions for the employees to ensure business continuity
- Evaluation and testing of the capacity of the existing IT infrastructure also in the light of the potential increase of the cyber attacks and the potentially higher dependence on the remote banking services
- Evaluation of the increased fraud risks connected with cybersecurity directed both to the clients and to the Bank by phishing emails, etc.;
- Starting discussions with service providers to ensure the succession of services in case of consequences from the pandemic;
- Moratorium on the loan repayment by clients affected by the crisis as an effective instrument in case of short-term liquidity difficulties of the banks' clients.

In connection with the COVID-19 pandemic and pursuance of the Guidelines of the European Banking Authority (EBA), the decisions of the Bulgarian National Bank and the Association of the Banks in Bulgaria (ABB) concerning the legislative and the non-legislative moratoria on loan repayments applied with a view to the crisis caused by COVID-19, Allianz Bank Bulgaria AD made a decision to join the approved terms and conditions for a non-legislative moratorium on repayments and developed an operational plan to assist in a balanced manner for the protection of its clients' interests and has continued providing high-quality bank services.

The Bank proposed mechanisms to its clients to relieve the servicing of the performing exposures of its clients - borrowers, affected by the measures related to the COVID-19 pandemic, following the decisions of the European Banking Authority (EBA), the Bulgarian National Bank, and the Association of the Banks in Bulgaria (ABB).

On 3 April 2020, the Governing Council of the Bulgarian National Bank decided to comply with the European Banking Authority (EBA) Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis (EBA/GL/2020/02.

Credit risk management in regard of COVID-19 pandemic, (continued)

On 10 April 2020, the Governing Council of the Bulgarian National Bank approved the Association of the Banks in Bulgaria's (ABB) draft Procedure for deferment and settlement of the collectible debts to banks and their subsidiaries - financial institutions in connection with the state of emergency introduced by the National Assembly on 13 March 2020, which represents a non-legislative moratorium in the meaning of European Banking Authority (EBA) Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis (EBA/GL/2020/02).

Allianz Bank Bulgaria AD joined the decision of the Association of the Banks in Bulgaria for applying the approved procedure for deferment of collectible debts. The approved non-legislative moratorium has allowed changes in the schedule for repayment of the principal and/ or the debt-related interests without changing the key parameters of the loan contract, for example, the agreed interests.

Based on the approved procedure, the Bank provides the following relieves to its clients:

- Mechanism No. 1 - deferment of the principal and the interest for up to 6 months, which shall expire latest on 31 December 2020;
- Mechanism No. 2 - deferment of the principal for up to 6 months, which shall expire latest on 31 December 2020;
- Mechanism No. 3 applicable for revolving facilities.

The EBA Guidelines introduce a temporary principle that the moratoria on bank loan repayments do not result in reclassifying exposures in the form of restructuring or default provided that the measures are based on national law and are agreed and applied on the bank sector level.

On 9 July 2020, the Governing Council of the Bulgarian National Bank decided to comply with the European Banking Authority (EBA) Guidelines - EBA/GL/2020/08 amending Guidelines EBA/GL/2020/02 on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis, which extend with three months - from 30 June 2020 to 30 September 2020, the deadline for applying the moratoria on repayments, laid down in Guidelines EBA/GL/2020/02. The extension of the term refers to a change in section 4, item 10, letter "f" of the EBA Guidelines - EBA/GL/2020/02.

Concerning the above and on the grounds of art. 16, item 20 of the Bulgarian National Bank Act and art. 79a, para. 3 of the Credit Institutions Act, BNB approved the proposed by the Association of the Banks in Bulgaria extension of the terms in the adopted Procedure for deferment and settlement of collectible debts to banks and their subsidiaries - financial institutions in connection with the state of emergency related to the COVID-19 pandemic, introduced on 13.03.2020 by the National Assembly.

The amendments refer to:

- extension of the deadline for submission of requests by clients of the banks for deferment of debts and their approval by the banks - until 30 September 2020.
- Extension of the deadline for deferment of clients' debts to banks - until 31 March 2021.
- Extension of the term of validity of the procedure for deferment of debts refers to exposures for which request for deferment of repayments was not submitted before 22 June 2020.

Credit risk management in regard of COVID-19 pandemic, (continued)

On 11 December 2020, the Governing Council of the Bulgarian National Bank (BNB) on the grounds of art. 16, item 20 of the BNB Act and art. 79a, para. 3 of the Credit Institutions Act approved the proposed by the Association of the Banks in Bulgaria extension of the deadline until 31 March 2021 of the approved „Procedure for deferment and settlement of collectible debts to banks and their subsidiaries - financial institutions related to the state of emergency announced by the National Assembly on 13 March 2020“, which represents a non-legislative moratorium in the meaning of the European Banking Authority (EBA) Guidelines - EBA/GL/2020/15 amending Guidelines EBA/GL/2020/02 on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis.

Concerning the COVID-19 pandemic, Allianz Bank Bulgaria AD on the grounds of a letter of the Bulgarian National Bank, ref. № БНБ-34578/03.04.2020 and in pursuance of the European Banking Authority Guidelines of 2 April 2020 – Guidelines on legislative and non-legislative moratoria on loan repayments applied in light of the COVID-19 crisis (EBA/GL/2020/02), amended by EBA Guidelines (EBA/GL/2020/08 of 25 June 2020) amending Guidelines EBA/GL/2020/02 and by EBAGuidelines (EBA/GL/2020/15 of 2 December 2020) amending Guidelines EBA/GL/2020/02, proposed to its clients the following options for deferment and settlement of debts:
- deadline for submission of requests by clients of the banks for deferment of debts - until 23 March 2021;
- Deadline for approval of these requests on the part of the banks - until 31 March 2021;
- deadline for deferment of debts of the banks’ clients - until 31 December 2021, however for up to 9 months;
- Introduction of the requirement that the debts subject to moratorium have been performing or not more than 90 days past due on the date of submission of the request for deferment;
- Introduction of the option that the debts for which request for deferment was submitted before 30 September 2020 may be additionally deferred provided that the total period of all deferments shall not exceed 9 months.

Operational plan for implementation of the measures for deferment and settlement of debts

The Management Board and the Supervisory Board of the Bank shall carry out adequate supervision on the critical elements of the credit risk management, including the following:

- Review of the risk assumption standards, risk appetite framework, and strategy under realistic macroeconomic scenarios;
- Adequate monitoring and analysis of all changes in the prudential and accounting frameworks;
- Appropriate delegation of competencies and authorities to experts and working groups in the bank for overcoming the impact of the COVID-19 crisis.

Ensuring disciplined and effective separation of the obligations under the processes of granting loans, monitoring, restructuring, and collection of loans with approved adequate organizational structure, which is to guarantee that no mixing will occur of activities allocated to the different functions and roles in the first and the second line of protection for the achievement of quick response to the COVID-19 pandemic.

The Risk Management Division includes the following directorates:

- Risk Control and Reporting Directorate with Credit Risk, Monitoring and Provisioning Department, which authorities include the monitoring of the credit exposures and the Bank’s portfolio;
- Credit Risk Directorate with competencies to approve new transactions;
- Problem Loans Directorate with Renegotiation and Restructuring Department with competencies to make decisions about renegotiating and restructuring of the Bank’s credit exposures.

Credit risk management in regard of COVID-19 pandemic, (continued)

The measure(s) provided by the Bank according to the approved mechanisms for deferment and settlement of the debts of obligors, subject to a moratorium on repayments, do not result automatically to the reclassification of exposures as exposures with restructuring measures, and the classification is reviewed for each case in compliance with art. 47 b of Regulation (EU) No. 575/2013.

Despite the COVID-19 related measures, concerning the annual risk review and updating, the parameters and the models of the Bank has undertaken the following actions:

- The Bank has updated the documentation in connection with the rating models, which apply for calculation of the probability of default (PD) and it has explicitly defined targets for each variable by which is monitored the strength of the model.
- As of 31.12.2020, the Bank has carried out the required changes of the models to guarantee the efficiency of the models by an expansion of the test set and through updating the most recent data, and for this purpose, training sets have been used (for 5 years from 28/11/2014 until 29/11/2019), by studying the behaviour of the Bank's obligors until 29/11/2020. All changes have been made and integrated into the Bank's systems. The results of the new models are documented in the methodology for PD.
- Internal methodology has been developed based on monitoring of the portfolio of Allianz Bank Bulgaria AD. Based on this methodology the current values of Lifetime PD have been calculated.
- As of 31.12.2020, the Bank has updated its models for calculation of the risk parameters: Forward-looking information (FLI), loss given default (LGD_ and credit conversion factor (CCF). In connection with the evaluation of the model adequacy, the analysis was performed of the series of data, including stationariness, autocorrelation, error, stability, forecasting accuracy tests. The changes of the model are documented.

The pessimistic scenarios are included with the highest weight in the models of calculation of the forward-looking information (FLI) for the probability of default (PD), loss given default (LGD), and the credit conversion factor (CCF). The balanced distribution of the alternative scenarios around the basic scenario laid down in the forecasts of the ECB is achieved through the established models.

Evaluation of considerable increase of the credit risk

The Bank evaluates adequately all risk parameters to reflect correctly the increased credit risk for the risk-weighted assets as well as for calculation of impairment provisions. For that purpose, the Bank considers the COVID-19 effects and the related mitigating measures (such as government guarantees and moratoria) in the process of determination of the ratings of each client and quantitative determination of the risk parameter in compliance with the regulatory requirements and the approved models and processes and compliance with the requirements of Regulation (EU) 529/2014.

Any change of each component of the variable of the PD model presumes evaluation of the materiality of the model change and approval of the relevant competent authorities of the Bank. Concerning the significant impairment of the business environment, the establishment of moratoria for payment does not result in improvements in the value of the risk indicators compared to the values observed before COVID-19.

For moratoria, which do not meet the EBA requirements, the restructuring measure is a factor, which takes part in the model and results in awarding the most negative rating grade D (PD 100%) for classification in Phase 3 and to rating impairment and application of lifetime PD as a result of the classification in Phase 2.

Credit risk management in regard of COVID-19 pandemic, (continued)

The moratoria on repayments related to COVID-19, which allows, requires, or promotes suspension or delay of repayments is not considered an automatic trigger to initiate evaluations for significant increase in credit risk (SICR). Significant increase in credit risk is established as early as possible, practically yet upon the establishment of the measure under the moratorium despite the evaluation of the rating system.

For all exposures affected by the COVID-19 crisis, the Bank applies additional provisions (Management Overlays provision) under the following conditions:

- The amount of the additional provision (Management Overlays provision) is measured in the hypothesis of the migration from Phase 1 to Phase 2 and the change of the rating with 1 degree, without a change in the other risk parameters.
- For all exposures for which additional provision is reported (Management Overlays provision), in case of a significant increase of the credit risk, the exposure is reclassified in Phase 2 and the Management Overlays provision is reintegrated. In the case of the hypothesis under which is identified impairment trigger, the exposure is reclassified in Phase 3 and the relevant provisions are calculated.

The updated criteria for portfolio provisioning in the light of the COVID-19 crisis apply from 19.05.2020 based on a decision of the Bank's Risk Committee.

For the loans subject to moratorium, the Bank has adopted additional triggers for transfer Phase 2 and 3, required by IFRS 9.B5.5.1 to IFRS 9.B5.5.18. The default-based triggers are not a factor for the assessment for Phase 2 considering that the days past due are counted only based on the revised repayment schedule.

Additionally, for exposures that benefit from moratoria, the Bank reflects additional restructuring in awarding assessment for the parameter PD based on the probability of default for the whole term of the exposure (lifetime PD) and conservative change of the rating by one degree assuming a conservative approach although the applied model includes explicit impairment of the probability of default as a result of worsening of the macro environment.

The Bank applies a conservative approach concerning the triggers for transfer between the Phases in the meaning of IFRS 9, defined based on each impairment by one grade, to which the relevant absolute PD corresponds. The Bank has not introduced higher relative thresholds for transfer between stages for obligors with higher PD respectively worse ratings. The rules transfers between Phases have not been changed as a result of the COVID-19 pandemic i.e. Upon occurrence or for more variable migrations of ratings.

The Bank adheres to the good practices by applying the approach of calculation of provisions under the hypothesis for transfer to Phase 2 for those cases in which the individual assessments are not possible or the ordinary indicators do not work. The calculation of the provisions for Phase 2 applies to all exposures with measures under the moratorium, which are not classified in Phase 3. This approach allows prompt recognition of the effects of the coronavirus pandemic (COVID-19) and eliminates any need for "huge revision upwards" at a later stage.

The Bank takes into account IFRS 9.5.5.11 and considers that all COVID-19 exposures more than 30 days past due have experienced a significant increase in credit risk and assesses provisions for them for Phase 3.

Credit risk management in regard of COVID-19 pandemic, (continued)

In addition to the statistical data, according to IFRS 9.B5.18, the Bank uses high-quality information to determine which exposures require that the estimated lifetime exposures are recognized. The information used for that purpose is consistent with the impairment triggers used upon monitoring of the clients and the portfolios and includes also elements as an applied measure for restructuring, increased indebtedness, unstable repayment, and breach of the crediting policy. In this regard, the Bank has adopted also an operational plan for assessment of the unlikeliness to pay.

Concerning the requirements of IFRS 9.B5.5.17 (f) and IAS 9.B5.5.17 (i) the Bank carries out sectoral analysis and thus takes into account all unfavourable changes in the business, financial and economic environment of the borrower. The Bank takes into account that the borrowers are affected (directly or indirectly) by the coronavirus pandemic (COVID-19) to a different extent, depending on their sector. In this regard, the macroeconomic information and/ or the unfavourable impact on the business of specific sectors may show that there is a significant increase in the credit risk for unfavourably affected exposures. The Bank may carry out transfer to Phase 2 only due to these specific circumstances unless there is more detailed information showing that the exposures may remain in Phase 1.

The Bank has carried out the relevant analyses, which lead to the conclusion that the unfavourable effects ensuing from business, financial and economic environment do not affect the whole portfolio. Allianz Bank Bulgaria AD applies analytical approaches for systematic determination which parts of the portfolio have not suffered a significant increase in the credit risk. Assessments are supported by the individual rating of each obligor. Restructuring measures that are inconsistent with the EBA Guidelines concerning the moratorium for payment lead to transfer at least to Phase 2. Based on the technical criteria: Defaulted Flag, number of restructuring measures, past default status, the Bank relates each exposure to predefined risk classification groups. In case of more than 30 days past due or availability of other impairment triggers, the exposure is classified in Phase 3.

Ecological issues

In the framework of the Corporate Responsibility Bank's strategy, the "low carbon economy" pillar addresses climate change and the environment as one of the three most significant risks and mega-trends. As part of a group that deals with this risk, environmental impact management is an important part of the Bank's approach. Climate change continues to be the greatest risk to the environment and, at the same time, to the whole value chain, which covers both the Bank's internal operations and all its investment and insurance products. “Allianz Bank Bulgaria” is committed to tackling the climate challenges and related health risks by managing its emissions from its operations as it strives to remain a carbon neutral company.

Allianz Bank Bulgaria PLC is committed to managing its most significant environmental impacts, including pollution prevention, and strives to continuously improve the environmental performance of its operations. We also take into consideration different environmental factors in our supply and delivery processes. In this way, we strive to raise our suppliers' awareness of our environmental commitments by encouraging them to take appropriate action.

The Bank as an Investment Intermediary

Allianz Bank Bulgaria AD is a primary dealer of government securities, an investment intermediary with full license, member of BSE-Sofia AD and Central Depository AD.

Investment intermediation activities include transactions with financial instruments for own account or for the account of clients of the bank. The main set of financial instruments that are traded are government and corporate bonds, shares and related rights, compensatory instruments, and shares in collective investment schemes. In 2017. considerable efforts have been made to meet the requirements of the new regulatory frameworks imposed by key European and local legislative initiatives such as MiFIDII, MIFIR and MFIA.

Under the conditions of super-liquidity and negative interest rates on the money markets in BGN and EUR in 2020, ABB sought to optimize its investments in fixed income instruments in terms of risk and profitability. In addition, the Bank served its clients' orders both on local and international financial markets.

Of the total volume of transactions in financial instruments realized in 2020 over 90% of them are from government securities transactions.

Other information

In the past 2020, the Bank did not have any R&D activities.

Events that occurred after the date of preparation of the financial statements and the activity report

There are no significant events occurring after the date of preparation of the statement of financial position that would require additional disclosures or adjustments to the financial statements.

Management and supervisory boards

The total remuneration received in 2020 by the members of the Management and Supervisory Board of ALIANZ BANK BULGARIA AD amounted to BGN 1,007 thousand (2019 – 1,538 thousand).

In 2020 there are no acquired, owned and transferred shares and bonds of the Bank by the members of the Supervisory and Management Boards. The Bank's Articles of Association do not provide for any

restrictions or preferential arrangements for the members of the Management Board and the Supervisory Board when acquiring shares and bonds issued by the Bank.

The shares in the capital of ALIANZ BANK BULGARIA AD are not traded on a regulated market and therefore the provisions of Directive 2004/25 / EC of the European Parliament and of the Council of 21.04.2004 on takeover bids are not applicable.

Participation of the members of the Management and Supervisory Board in commercial companies:

1. DIMITAR ZHELEV - does not participate in commercial companies as an unlimited liability partner; owns more than 25% of the capital of BULLS AD, Sofia and DZH AD, Bankya; Administrator of ALLIANZ BULGARIA HOLDING AD, Sofia, UNICREDIT BULBANK AD, city of Sofia; "DZH" AD, city of Sofia; "BULLS" AD, city of Sofia, REAL ESTATE DEVELOPMENT EAD, city of Sofia; ZAD ALLIANZ BULGARIA, city of Sofia; and ZAD ALLIANZ BULGARIA LIFE, city of Sofia;
2. CHRISTOPH PLEIN - does not participate in commercial companies as an unlimited liability partner; does not hold more than 25% of the capital of another company;
3. RAYMOND SEAMER - does not participate in commercial companies as an unlimited liability partner; does not hold more than 25% of the capital of another company;
4. REINER FRANZ - does not participate in commercial companies as an unlimited liability partner; holds more than 25% of the capital of Communication sro, Bratislava; is an administrator of Communication sro, Bratislava.

Management and supervisory boards (continued)

5. KAI MUELLER - does not participate in commercial companies as an unlimited liability partner; does not hold more than 25% of the capital of another company; Administrator of ALLIANZ NEW EUROPE HOLDING GMBH, ALLIANZ PENZIJNI SPOLECNOST, A.S., ALLIANZ ALAPKEZELO ZRT., ALLIANZ HUNGARIA ZRT., ALLIANZ ZB LTD MANDATORY AND VOLUNTARY PENSION FUNDS MANAGEMENT COMPANY, ALLIANZ BANK BULGARIA AD, TFI ALLIANZ POLSKA S.A., TUiR ALLIANZ POLSKA S.A., TU AL LIANZ ZYCIE POLSKA S.A., ALLIANZ POJISTOVNA, A.S., ALLIANZ-TIRIAC ASIGURARI S.A., PENSION INSURANCE COMPANY ALLIANZ BULGARIA JSC.

6. EDUARD GOOS – starting 07.05.2019 does not participate in commercial companies as an unlimited liability partner; does not hold more than 25% of the capital of another company.

Members of the Mnagement Board as at December31 ,2020

1. Ioannis Kotsianos - does not participate in commercial companies as an unlimited liability partner; does not hold more than 25% of the capital of another company; Administrator of ZAD ALLIANZ BULGARIA, ZAD ALLIANZ BULGARIA LIFE, POD ALLIANZ BULGARIA, ALLIANZ LEASING BULGARIA, BULGARIA LIFE, ZAD ENERGY.
2. Georgi Zamanov - does not participate in commercial companies as an unlimited liability partner; does not hold more than 25% of the capital of another company; is not an administrator of commercial companies.
3. Hristina Martsenkova - does not participate in commercial companies as an unlimited liability partner; does not hold more than 25% of the capital of another company, city of Sofia (until 11.01.2017). Registered is a sole trader - ET with company "HM - Hristina Hristova".
4. Iordan Souvandjiev - does not participate in commercial companies as an unlimited liability partner; does not hold more than 25% of the capital of another company; is not an administrator of commercial companies.
5. Lyuba Pavlova - sole owner of the capital and manager of Risk Farmer EOOD; does not participate in another commercial companies as an unlimited liability partner; does not hold more than 25% of the capital of another company;is not an administrator of commercial companies.

There is no information on the conclusion in 2020 of contracts under Art. 240b of the Commercial Act between the members of the Boards and the Bank, which go beyond the normal activity of the Company or materially deviate from the market conditions.

No transferred own shares or acquired shares in 2020 under Article 187e of the Commerce Act. “ALIANZ BANK BULGARIA" AD does not hold its own shares.

Internal control

The audit work of the Bank's Specialized Internal Audit Service is regulated by the Credit Institutions Act, Ordinance No. 10 on Internal Control of the BNB and the Internal Rules for its Organization and Activities. Internal Audit assesses the efficiency and effectiveness of the internal control framework the bank.

The internal audit assesses the compliance of the bank processes and activities of the Bank's units with the legal framework and with the internal banking rules and procedures, performing methodological functions to unify the good practices in the Bank's system. Through an independent and objective assessment of the quality of the internal control system, the Specialized Internal Audit Service seeks to add value and improve the effectiveness of ABB.

In 2020, with 25 planned, the Internal Audit Department has carried out 27 audit engagements, incl. 1 unscheduled, of which 13 in the units of the Headquarters and 14 in the Bank's business centers.

Internal control, (continued)

Detailed information on the results of the audits is contained in the Annual Report on the Activities of Specialized Internal Audit Service unit.

The Bank's management reacts in a timely manner and takes adequate measures to implement the recommendations proposed by the Internal Audit to improve internal control in the main banking processes and activities. In general, the control procedures introduced are adequate, the internal control system is reliable and sufficiently limits the inherent risks to the business.

Management responsibilities

According to the Bulgarian legislation, the management should prepare a financial statement for each financial year, which should give a true and fair view of the condition of the Bank at the end of the year and its accounting results. The financial statements have been prepared in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union.

Management confirms that it has consistently applied an adequate accounting policy and that the principle of prudence in the assessment of assets, liabilities, income and expenses has been observed in the preparation of the financial statements as at 31 December 2020.

Management also confirms that it has adhered to the applicable accounting standards, and the financial statements have been prepared on the going concern basis.

Management is responsible for the proper keeping of accounting records, for the proper management of assets and for taking the necessary measures to avoid and detect possible abuses and other irregularities.

Dear Shareholders,

By the end of 2020, the Bank is stable and will continue to respond adequately to unforeseen risks and fluctuations in the marketplace.

The institution carries the name of a world-famous financial leader and enjoys an excellent reputation in professional circles and among its clients. We are confident that offering integrated banking, insurance and pension insurance products, quality customer service and sustainable business growth will deliver even better results.

This Activity Report was adopted by the Bank's Management Board on March 30th 2021 and was signed on its behalf by:

Georgi Zamanov	Hristina Martsenkova
Chief Executive Officer	*Executive Director*

CORPORATE MANAGEMENT DECLARATION
of Allianz Bank Bulgaria AD
for 2020

Allianz Bank Bulgaria AD views good corporate management as a part of contemporary business practice, an aggregate of balanced relations between the Management bodies of the Company, its shareholders and all stakeholders – employees, clients, partners and the community as a whole. The bank implements appropriate practices for good corporate management, which result from the current Bulgarian legislation and the requirements of Allianz Group for good corporate management. The upper management of the Bank believes the effective implementation of good corporate management practices contribute to achieving sustainable growth and the long-term goals of the Company, as well as establishing transparent and honest relation to all stakeholders. *(information under Article 100m, paragraph 8, item 1b) of the Public Offering of Securities Act)*.

Allianz Bank Bulgaria AD adopts and implements a Business Ethics Code of Conduct / Ethical Code of Conduct of Allianz Group *(information under Article 100m, paragraph 8, item 1c) of the Public Offering of Securities Act)*:
Allianz Bank Bulgaria AD adopts and implements the group policy for stress management in the bank for the continuous improvement of occupational health and safety. *(information under Article 100m, paragraph 8, item 1c) of the Public Offering of Securities Act).*

When appointing people to managerial positions, Allianz Bank Bulgaria AD applies the principles underlying in the Qualification and Reliability Policy of Allianz Group.

In compliance with the above policies, Allianz Bank Bulgaria AD declares their commitment to the application of the principles of transparency, independence and responsibility of the managerial and supervisory bodies of the Bank (Supervisory and Management Board) in compliance with the established vision, goals, strategies of the companies and the interests of the shareholders. *(information under Article 100m, paragraph 8, item 5 of the Public Offering of Securities Act)* **application of the Diversity policy regarding administrative, managerial and supervisory bodies** *(information under Article 100m, paragraph 8, item 6 of the Public Offering of Securities Act).*

1.1. The Supervisory board of Allianz Bank Bulgaria AD consists of 6 (six) members, who are appointed by the General assembly of the shareholders for a set term.

1.2. The Supervisory board performs their activity in compliance with the Bank Statute and the Supervisory Board Working Regulations, as well as the applicable legislation.

1.3. The Management board of Allianz Bank Bulgaria AD consists of 5 (five) members, appointed by the Management board.

1.4. The Management board performs their activity in compliance with the Bank Statute and the Management Board Working Regulations, as well as the applicable legislation.

1.5. In the performance of their functions and powers the Supervisory and Management boards are governed by the current legislation, by internal regulations and the standards for integrity and competence.

1.6. The members of the managerial bodies can only be competent individuals, without restrictions as to age, gender, nationality or education.

1.7. The members of the Management board and Supervisory board include individuals with good reputation, professional experience and managerial skills. Forming the composition of the managerial and supervisory bodies aims a balance between experience, professionalism, knowledge of the activity as well as independence and objectivity in expressing opinions and decision-making.

1.8. The members of the Management and Supervisory boards can be reappointed without limitation.

Application of the Diversity policy regarding administrative, managerial and supervisory bodies *(information under Article 100m, paragraph 8, item 6 of the Public Offering of Securities Act).*

1.9. The managerial bodies are assisted in their activities by internal bank bodies (committees and commissions) with particular powers, regulated by legislation or internal bank rules and procedures.

1.10.Specialized bodies to the Management and Supervisory Board of the Bank

1.10.1.RiskCommittee / RiCo /

The Risk Committee is an independent body to the Management Board of the Bank, whose main objective is to establish and maintain control over risk management activities. Creates, develops and approves the risk strategy in line with business strategy and risk appetite. Controls the risk capital allocation. Ensures appropriate monitoring and risk control at the individual and portfolio levels. The risk management structure covers systems, processes, organizational units and individuals whose main purpose is to implement the function independent of the operational units in identifying, monitoring and managing the risk assumed by the bank.

Risk management at the bank ensures identification, measurement and reporting of all material risks. The respective responsible persons performing risk management functions in the bank participate in the design of the risk management strategy when making all decisions related to the management of significant risks and are able to present a full overview of the risks to which it is exposed or may be exposed to the bank.

The risk committee is chaired by the Chief Risk Officer and meets at least once a month on a proposed agenda. The Risk Committee's work is defined in detail in the "Operating Rules of the ABB Risk Management Committee". The members of the Committee are the Chief Operating Officer, Chief Financial Officer, Head of the Problem Loans, Head of the Planning and Controlling Division, Head of Credit Risk Division, Director Risk Controlling and Reporting Directorate.

A Risk Committee at the Supervisory Board level is a subsidiary body of the Supervisory Board that monitors and oversees the management and control of risks. The approval of transactions with gross exposures of more than 5% of the capital base must be approved by that committee before being submitted for approval to the Supervisory Board. Members are two members of the Supervisory Board. The Chief Executive Officer and Chief Risk Officer are "permanent guests". They meet quarterly.

1.10.2. Asset and Liability Management Committee (ALMC)

The Asset and Liability Management Committee supports the Management Board's business strategy, policies and the overall asset and liability management system as well as management of the Bank's liquidity. It approves investment policy for new products. The main purpose of asset and liability management is to ensure stable earnings and optimize the return on capital of the Bank while maintaining acceptable levels of risk and capital adequacy in the implementation of the development strategy and the assigned tasks in the plan for the respective financial year.

The Committee shall be chaired by the Chief Financial Officer and shall meet at least once a month. Members of the Committee are the Chief Executive Officer, Chief Business Officer, Chief Risk Officer, Head of Liquidity and Markets Division and Head of Planning and Controlling Division. The Chief Risk Officer has veto right in liquidity management decisions.

Application of the Diversity policy regarding administrative, managerial and supervisory bodies *(information under Article 100m, paragraph 8, item 6 of the Public Offering of Securities Act). (continued)*

1.10.3. Credit council

The Credit council of Allianz Bank Bulgaria AD, hereinafter referred to as the "CB", is a standing internal bank collective body for making decisions on credit transactions, restructuring of problematic credit exposures for the purpose of their reorganization, approval of an action plan for collection / , as well as the approval of out-of-court agreements for the collection / recovery of the bank's claims.

The activities within the competence of the Credit council of Allianz Bank Bulgaria AD are:

Any undertaking of credit risk in the portfolio, renegotiation and review of existing exposures in the three segments - Retail Banking, Corporate Banking and Investment Banking, whereby a net credit exposure of the client and its affiliates on the relevant business line is formed in excess of the specified competences.

Restructuring of credit transactions, approval of an action plan / proposal on problematic claims, incl. decision on early claims, incl. determining how to recover the claim and making an out-of-court settlement; taking a decision for the Bank to foreclose on collateral assets for sale or management; making a cession decision; write-off of the claim at the expense of provisions, termination of balance sheet or off-balance sheet exposures, etc. for the net credit exposure of the client and related parties in the respective business line.

The Credit council is chaired by the Chief Executive Officer. Members of the Board are the Chief Business Officer, Deputy Officer in Business Division, the Chief Risk Officer, Head of Credit Risk Division, Head of the Problem Loans Division.

1.10.4. Problem Loans Credit Committee

The Problem Loans Credit Committee of Allianz Bank Bulgaria AD, is a standing internal bank collective body for making decisions on restructuring of problematic credit exposures for the purpose of their reorganization, approval of an action plan for collection / , as well as the approval of out-of-court agreements for the collection / recovery of the bank's claims.

The activities within the competence of the Problem Loans Credit Committee are:

Termination of balance sheet or off-balance sheet exposures,

Restructuring of credit transactions, approval of an action plan / proposal on problematic claims, incl. decision on early claims, incl. determining how to recover the claim and making an out-of-court settlement; taking a decision for the Bank to foreclose on collateral assets for sale or management; making a cession decision; write-off of the claim at the expense of provisions, etc.

Other functions deriving from domestic banking regulations approved in the appropriate order - Procurement Policy; Rules and procedures regarding the activity of managing the bank's problematic claims; as well as regulatory documents of the Allianz Group.

The Problem Loans Credit Committee is chaired by the Head of the Problem Loans Division and meets regularly every Tuesday at 2 pm and on the last working day of the current month.

Application of the Diversity policy regarding administrative, managerial and supervisory bodies *(information under Article 100m, paragraph 8, item 6 of the Public Offering of Securities Act). (continued)*

The members of the Committee are the Manager of Restructuring and Centralization Department with Problem Loans Division, the Director of Judicial Debt Collection Directorate, Manager of department with Judicial Debt Collection Directorate, and the Legal Advisor in Legal Services Division.

2. Description of the main characteristics of the internal control system and of the risk management system of the issuer in connection with the financial reporting process *(information under Article 100m, paragraph 8, item 3 of the Public Offering of Securities Act)*

Internal control system

2.1. Allianz Bank Bulgaria AD has established an internal control system, for the purpose of protecting the interests and the rights of shareholders and clients, as well as contributing to lowering the risks, ensuring reliability and authenticity of reporting in compliance with the regulatory requirements.

2.1.1. Audit Committee

The Audit Committee of the Bank is established and acts in accordance with the requirements of the Independent Financial Audit Act (prom. SG 95/29.11.2016), Regulation (EU) No 537/2014 of the European Parliament and of the Council of 16 April 2014 on specific requirements regarding statutory audit of public-interest entities and Directive 2006/43 / EC of the European Parliament and of the Council Of the European Parliament and of the Council of 17 May 2006 on statutory audits of annual accounts and consolidated accounts.

The Audit Committee is an independent permanent body, the members of which are elected and dismissed by the General Assembly of Shareholders on the proposal of the Chairperson of the Supervisory Board of the Bank. The Audit Committee's organization and operation are regulated in the Audit Committee's Rules of Procedure adopted by the General Assembly of Shareholders.

The Audit Committee assists the Bank's governing bodies in the performance of their duties relating to the supervision of financial reporting, internal audit, internal control and compliance with legal and regulatory provisions as well as the Allianz Group Business Ethics and Compliance Code of Conduct (Ethical Code).

2.1.2. The Bank's Specialized Internal Audit Service (SIAS)

The Specialized Internal Audit Service was established on the grounds of Art. 74 of the Credit Institutions Act under the requirements of BNB Ordinance No. 10 on Internal Control in Banks and the Statute of the Bank. The primary objective of the SIAS is to improve the Bank's operations and achieve its objectives by implementing a systematic and disciplined approach to assessing and improving the Bank's risk management, control and management processes. It assists the Bank's governing bodies in taking decisions of a financial and organizational nature in order to protect the interests of the Bank, its shareholders and depositors and monitor their implementation.

2. Description of the main characteristics of the internal control system and of the risk management system of the issuer in connection with the financial reporting process *(information under Article 100m, paragraph 8, item 3 of the Public Offering of Securities Act) (continued)*

The internal audit carried out by the SIAS is an independent and objective valuation of bank transactions and control operations and systems that is being verified and evaluated as follows:

- the legality of operations, compliance with internal rules and procedures and the implementation of management decisions;
- internal control procedures for conducting transactions;
- risk management systems, risk assessment methods and capital adequacy;
- performance of contracts and commitments;
- the compliance of banking practices with the Bank's operational and strategic policy;
- protection of assets and bank records from negligence and abuse;
- a reporting and information system, the usefulness of analyzes, electronic information systems and data loyalty;
- the efficiency and the results of the bank transactions and operations carried out;
- the selection and qualification of staff, and the relevance of job descriptions and competences;
- the reliability and timeliness of the supervisory reports.

2.2. Regulatory control

The compliance management function is limited to preventing and limiting the occurrence of regulatory discrepancies, violations and conflicts of interest **.** The ultimate goal is to preserve the Bank's reputation and customer loyalty.

Risk management system

2.3. The management of the Bank strives to develop active management of all types of risks arising from the specifics of banking activity - market, liquid, credit, operational and reputational.

2.4. The risk management system determines the powers and responsibilities in the separate structural divisions of the Bank, the organization and order of cooperation in risk management, analysis and assessment of information, related to risk, preparing periodic reports of risk management.

2.5. The organization and activity of officials and units related to risk management in the Bank are fully compliant with the requirements of the Credit Institutions Act, the issued Ordinance № 7 of the BNB dated 24 April 2014 on the organization and risk management in banks, and all other relevant legislation, rules and policies.

2. Description of the main characteristics of the internal control system and of the risk management system of the issuer in connection with the financial reporting process *(information under Article 100m, paragraph 8, item 3 of the Public Offering of Securities Act) (continued)*

2.2. Regulatory control (continued)

2.6. Risk Committee / RiCo /

The Risk Committee is an independent body to the Management Board of the Bank, whose main objective is to establish and maintain control over risk management activities. Creates, develops and approves the risk strategy in line with business strategy and risk appetite. Controls the risk capital allocation. Ensures appropriate monitoring and risk control at the individual and portfolio levels. The risk management structure covers systems, processes, organizational units and individuals whose main purpose is to implement the function independent of the operational units in identifying, monitoring and managing the risk assumed by the bank.

Risk management at the bank ensures identification, measurement and reporting of all material risks. The respective responsible persons performing risk management functions in the bank participate in the design of the risk management strategy when making all decisions related to the management of significant risks and are able to present a full overview of the risks to which it is exposed or may be exposed to the bank.

Detailed risk management in the Bank is described in the Annual Financial Statement and Activity Report.

Components and main characteristics of internal control system and of the risk management system in connection with the financial reporting process of the Bank

2.7. Controlled environment. The controlled environment includes the following elements:

Communication and imposition of integrity and ethical values. Imposing integrity and ethical values includes, but is not limited to, action by the management for elimination or mitigation of stimuli or temptation which could induce the staff to engage in dishonest, illegal or unethical conduct. The policy of integrity and ethical values of the Bank includes communication of ethical standards to the staff via following the Business Ethics Code of Conduct / Ethical Code of Conduct of Allianz Group.

Commitment to competence. Competence means the knowledge and skills, necessary for performance of the tasks included in the job description of the respective person.

Participation of those charged with governance via monitoring of the model design and the effective functioning of the alert procedures and efficiency review procedures of the internal Bank control.

Philosophy and operational style of the management.

Established proper organizational structure, including taking into consideration the main areas of powers and responsibilities and the proper hierarchy levels of reporting.

Assigning appropriate powers and responsibilities.

2. Description of the main characteristics of the internal control system and of the risk management system of the issuer in connection with the financial reporting process *(information under Article 100m, paragraph 8, item 3 of the Public Offering of Securities Act) (continued)*

2.2. Regulatory control (continued)

2.7. Controlled environment. The controlled environment includes the following elements (continued)

Policy and practice, related to human resources, including high standards of recruiting qualified personnel – focused on , education level and former professional experience, with accent on continued education.

2.8. Risk Assessment Process of the Bank. For the purpose of financial reporting, the Bank’s risk assessment process includes the manner in which the management identifies business risks, material for the preparation of a financial statement in compliance with the financial reporting framework applicable to the enterprise, assesses their significance, assesses the probability of their occurrence and decides on the best response to these risks and the way to manage them and to assess the results. The risks, material to reliable financial reporting include internal and external events, transactions and circumstances, which can occur and negatively impact the ability of the Bank to initiate, register, process and report financial information, in compliance with the assertions made by the management in the financial statement.
Risks can occur or change due to circumstances like the ones listed below:

- Changes in the regulatory environment;
- New staff;
- New or updated information systems;
- Rapid growth;
- New technologies;
- New business models, products or activities;
- Corporate restructuring; and
- New accounting standards and clarifications.

2.9. Information system, including the related business processes, relevant to financial reporting and communications. The information system includes infrastructure (physical and hardware components), software, people, procedures and data. The information system of the Bank, related to the purposes of financial reporting, which includes the financial reporting system, includes methods and documentation which:

Identify and reflect all valid deals and operations;

Describe promptly the deals and operations with enough detail, allowing their proper classification for the purposes of financial reporting;

Assess the value of the deals and operations in a manner which allows the reflection of their proper monetary value in the Bank’s financial statement.

2. Description of the main characteristics of the internal control system and of the risk management system of the issuer in connection with the financial reporting process *(information under Article 100m, paragraph 8, item 3 of the Public Offering of Securities Act) (continued)*

2.2. Regulatory control *(*continued)

Determine the time period during which the deals and operations in order to allow their recording in the proper reporting period;

Properly represent the deals and operations and the related disclosures in the financial statement.

2.10. Control activities. The Bank has adopted a number of policies and procedures regarding the following:

Performance and results reviews;

Information processing;

Physical controls (asset security, approval of access to computer programs and data files; periodic counting and comparison of amounts in the accounting registers); and

Separation of duties.

2.11. Current monitoring of controls . An important responsibility of the management is to establish and maintain continuous internal control. The current monitoring of controls by the management includes assessment whether they work as intended and whether they are modified appropriately to reflect changes in the circumstances. Internal auditors and other staff with similar functions contribute to the current monitoring of controls thought separate assessments.

3. Information on the existence of takeover or merger bids in 2019 *(information under Article 100m, paragraph 8, item 4 of the Public Offering of Securities Act – respectively under Article 10, paragraph 1, letters "c", "d", "f", "h" and "i" of Directive 2004/25/EC of the European Parliament and the Council of 21 April 2004 on takeover bids)*

3.1. As at 31.12.2020 Allianz Bank Bulgaria AD has not received any takeover or merger bids from other companies.

Allianz Bank Bulgaria AD, cognizant of the public significance of their performance results, observes the principle of transparency of information regarding their activity, strives to achieve and maintain stable, constructive relations with the BNB, FSC, NSSI, NRA and other state bodies and institutions, which are related or have control over their activity. These relations are based on the principles of responsibility, good faith, professionalism, partnership, trust, and also respect and observance of commitments.

The Bank carries out their activity in strict compliance with the laws and other regulations of Republic of Bulgaria.

3. Information on the existence of takeover or merger bids in 2019, (continued)

This Declaration of corporate management is prepared in accordance with Article 40 of the Accountancy Act and was approved by the Management Board for issuing on March 30th 2021, and in an integral part of the annual report for 2019 by Allianz Bank Bulgaria AD, together with the annual financial statement and the Management activity report.

On behalf of the Management Board of Allianz Bank Bulgaria AD:

Georgi Zamanov	Hristina Martsenkova
CEO	Executive director

For the year ended 31 December

In BGN thousand	**App.**	**2020**	**2019**
Interest income	9	58,805	63,586
Interest expenses	9	(939)	(2,917)
Net interest income	9	**57,866**	**60,669**
Revenue from fees and commissions	10	22,225	23,321
Expenses for fees and deductions	10	(8,548)	(7,997)
Net income from fees and commissions	10	**13,677**	**15,324**
Net income from trade operations	11	236	713
Income from investment operations	12	68	34
Total income from banking operations		**71,847**	**76,740**
Other operating income	14	6,222	5,378
Net loss on impairment of financial assets, measured at impaired cost and FVOCI	20	(25,272)	(1,554)
Net impairment losses on other financial assets	20	(23)	(369)
Administrative and other expenses	13	(43,574)	(43,425)
Profit before tax on profit		**9,200**	**36,770**
Tax expenses	15	(959)	(3,719)
Profit for the year		**8,241**	**33,051**

The profit or loss account should be read in conjunction with the appendices on page 35 to 152 that are an integral part of the financial statements. The financial statement was approved by the Management Board of the Bank for publishing on March 30th 2021.

Georgi Zamanov	Hristina Martsenkova	Lyuba Pavlova
CEO	*Executive director*	*Prepared by*

According to the independent auditors’ report

PricewaterhouseCoopers Audit OOD　　“HLB Bulgaria” OOD

Jock Nunan	Anna Boteva	Dimitrios Papazis	Stoyan Stoyanov
Procurator	*Registered Auditor, responsible for the audit*	*Manager*	*Registered Auditor, responsible for the audit*

According to the independent auditors’ report

For the year ended 31 December			
In BGN thousand	**App.**	**2020**	**2019**
Profit for the year		**8,241**	**33,051**
Other components of comprehensive income: ***Components that can be reclassified in profit or loss:***			
Net change in the fair value reserve		300	(585)
Income tax related to components of other comprehensive income that can be reclassified		(30)	59
		270	**(526)**
Components that will not be reclassified in profit or loss:			
Net change in the fair value reserve of capital instruments		808	1,554
Income tax related to components of other comprehensive income that will not be reclassified		(81)	(155)
Subsequent measurement of obligations under a defined benefit plan	27	(26)	(64)
Income tax related to subsequent measurement of obligations under a defined benefit plan		3	6
Other adjustments from previous year		-	(11)
		704	**1,330**
Other comprehensive income, net of taxes		**974**	**804**
TOTAL COMPREHENSIVE INCOME FOR THE YEAR		**9,215**	**33,855**

The statement of comprehensive income should be read in conjunction with the appendices on page 35 to 152 that are an integral part of the financial statements. The financial statement was approved by the Management Board for publishing on March 30th 2021.

Georgi Zamanov
CEO

Hristina Martsenkova
Executive director

Lyuba Pavlova
Prepared by

According to the independent auditors' report

PricewaterhouseCoopers Audit OOD

"HLB Bulgaria" OOD

Jock Nunan
Procurator

Anna Boteva
Registered Auditor, responsible for the audit

Dimitrios Papazis
Manager

Stoyan Stoyanov
Registered Auditor, responsible for the audit

ALLIANZ BANK BULGARIA AD
STATEMENT OF FINANCIAL POSITION
31 DECEMBER 2020

In BGN thousand	**App.**	**31 Dec 2020**	**31 Dec 2019**
Assets			
Cash and cash equivalents	16	981,561	760,076
Financial assets at fair value through profit and loss	17	3	4
Loans and advances to banks	18	39,059	19,541
Loans and advances to clients	20	1,547,666	1,367,509
Financial assets at fair value through other comprehensive income	19.1	210,056	209,712
Financial assets measured at amortized cost	19.2	468,543	494,573
Property, plant and equipment	21	7,587	6,399
Right of use assets	22	8,538	7,889
Intangible assets		7,630	6,641
Current tax assets	23	1,258	-
Other financial assets	24	512	5,511
Other assets	25	8,196	6,517
Total assets		**3,280,609**	**2,884,372**
Liabilities			
Deposits from banks	27	28,156	31,601
Deposits from clients	26	2,983,881	2,587,467
Other borrowed funds	27	4,956	7,021
Lease liabilities	28	8,431	7,876
Provisions for guarantees		2,881	3,041
Current tax liabilities		-	373
Deferred tax liabilities	29	145	137
Other financial liabilities	30	2,607	7,583
Other liabilities	31	4,802	3,738
Total liabilities		**3,035,859**	**2,648,837**
Equity			
Share capital	33	69,000	69,000
Statutory reserves	33	9,850	9,850
Retained earnings		156,301	148,086
Fair value reserve		9,599	8,599
Total equity		**244,750**	**235,535**
Total liabilities and equity		**3,280,609**	**2,884,372**

The statement of financial position should be read in conjunction with the appendices on page 35 to 152 that are an integral part of the financial statements. The financial statement was approved by the Management Board for publishing on March 30th 2021.

Georgi Zamanov	Hristina Martsenkova	Lyuba Pavlova
CEO	*Executive director*	*Prepared by*

According to the independent auditors' report

PricewaterhouseCoopers Audit OOD		"HLB Bulgaria" OOD	
Jock Nunan	Anna Boteva	Dimitrios Papazis	Stoyan Stoyanov
Procurator	*Registered Auditor, responsible for the audit*	*Manager*	*Registered Auditor, responsible for the audit*

For the year ended 31 December

In BGN thousand	**App.**	**2020**	**2019**
Cash flows from operating activity			
Profit for the year		8,241	33,051
Adjustments for non-cash transactions:			
Net impairment losses on financial assets		25,272	1,554
Net impairment losses on other financial assets		23	369
Impairment losses on non-financial assets		344	-
Depreciation	21,23	1,870	2,139
Depreciation for Right of use assets	22	3,449	3,234
Revenue from dividends	12	(68)	(34)
Interest income	9	(58,805)	(63,586)
Interest expense	9	939	2,917
Net (gains) on financial asset transactions, including currency revaluation	11	(2,294)	(2,559)
Net (profits)/ losses from remeasurement of financial assets measured at fair value through profit or loss	11	2,058	1,846
Income tax expenses	15	959	3,719
Cash flows used in operating activities before changes in operating assets and liabilities		**(18,012)**	**(17,350)**
Changes in assets and liabilities in operating activities:			
Financial assets reported at fair value through profit or loss		2,294	7,035
Loans and advances to banks		(19,483)	19,568
Loans and advances to clients		(203,153)	(69,008)
Other assets		4,569	2,408
Deposits from banks		(3,431)	(13,718)
Deposits from clients		396,584	124,768
Other borrowed funds		(2,065)	(7,964)
Other liabilities		(6,108)	803
		151,195	**46,542**
Dividends received		68	34
Interest received	12	86,940	71,021
Paid interest		(1,081)	(2,641)
Tax paid on profit		(2,530)	(3,553)
Net cash flows from financial activities		**234,592**	**111,403**
Cash flows from investment activities			
Purchase of property, plant and equipment		(2,239)	(982)
Purchase of intangible assets		(2,152)	(1,377)
Purchase of investment securities		(80,823)	(103,588)
Proceeds from sale and maturity of investment securities		77,409	83,133
Net cash flows from/ (used in) investment activities		**7,805**	**(22,814)**

For the year ended 31 December

In BGN thousand	**App.**	**2020**	**2019**
Cash flows from financial activity			
Principal payments on leases		(3,493)	(3,620)
Interest payments on leases		(42)	(180)
Dividend paid		-	(20,000)
Net cash flows used in financial activities		**(3,535)**	**(23,800)**
Net increase in cash and cash equivalents		223,252	64,789
Cash and cash equivalents at 1 January		760,076	693,224
Effect of currency revaluation of cash and cash equivalents		(1,767)	2,063
Cash and cash equivalents at 31 December	16	**981,561**	**760,076**

The statement of cash flows should be read in conjunction with the appendices on page 35 to 152 that are an integral part of the financial statements. The financial statement was approved by the Management Board for publishing on March 30th 2021.

Georgi Zamanov
CEO

Hristina Martsenkova
Executive director

Lyuba Pavlova
Prepared by

According to the independent auditors' report

PricewaterhouseCoopers Audit OOD

"HLB Bulgaria" OOD

Jock Nunan
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Registered Auditor, responsible for the audit

Dimitrios Papazis
Manager

Stoyan Stoyanov
Registered Auditor, responsible for the audit

ALLIANZ BANK BULGARIA AD
STATEMENT OF CHANGES IN EQUITY
31 DECEMBER 2020

In BGN thousand	**App.**	**Share capital**	**Statutory reserves**	**Retained earnings**	**Fair value reserve**	**Total**
Balance as at 1 January 2019		**69,000**	**9,850**	**135,099**	**7,731**	**221,680**
Total comprehensive income for the year						
Profit for the year		-	-	33,051	-	33,051
Other components of comprehensive income, net of taxes		-	-	-	868	868
Defined benefit plans		-	-	(64)	-	(64)
Total comprehensive income for the year		**-**	**-**	**32,987**	**868**	**33,855**
Transactions with shareholders						
Distribution of profits for dividends		-	-	(20,000)	-	(20,000)
Balance as at 31 December 2019	28	**69,000**	**9,850**	**148,086**	**8,599**	**235,535**
Balance as at 1 January 2020	28	**69,000**	**9,850**	**148,086**	**8,599**	**235,535**
Total comprehensive income for the year						
Profit for the year		-	-	8,241	-	8,241
Other components of comprehensive income		-	-	-	1,000	1,000
Defined benefit plans		-	-	(26)	-	(26)
Total comprehensive income for the year		**-**	**-**	**8,215**	**1,000**	**9,215**
Transactions with shareholders						
Distribution of profits for dividends		-	-	-	-	-
Balance as at 31 December 2020	28	**69,000**	**9,850**	**156,301**	**9,599**	**244,750**

The statement of changes in equity should be read in conjunction with the appendices on page 35 to 152 that are an integral part of the financial statements. The financial statement was approved by the Management Board for publishing on March 30th 2021.

Georgi Zamanov
CEO

Hristina Martsenkova
Executive director

Lyuba Pavlova
Prepared by

According to the independent auditors' report

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Dimitrios Papazis
Manager

Stoyan Stoyanov
Registered Auditor, responsible for the audit

1. (a) Legal status and ownership

Allianz Bank Bulgaria AD (the "Bank") is registered in the Republic of Bulgaria and has its registered office in Sofia and address of management: Sofia, Vazrazhdane municipality, 79, Maria Louisa Blvd. The Bank is a universal commercial bank and has a full banking license issued by the Bulgarian National Bank (BNB), on the basis of which it operates in all areas of banking in the country.

The ultimate parent and controlling entity of the Bank is Allianz SE, Germany. Direct majority owner of the Company is Allianz Bulgaria Holding AD.

(b) Management

As at 31 December 2020, the management of the Bank, namely the Management Board, consists of five members, namely: Ioannis Kotsianus, Georgi Zamanov, Hristina Martsenkova, Lyuba Pavlova and Iordan Souvandjiev.

As of December 31, 2020, the Bank's Supervisory Board consists of the following members: Dimitar Zhelev, Christoph Plain, Raymond Seamer, Rainer Franz, Kay Müller and Eduard Goos.

The Bank has an Audit Committee that monitors the work of its external auditors, internal auditing, risk management and accounting and financial reporting.

As at 31 December 2020, the Audit Committee has the following composition: Stefan Stefanov, Kay Müller and Maxim Sirakov.

(c) Structure of the Bank

As at 31 December 2020, the Bank has 60 structural units, incl. Headquarters, 32 banking centers. 24 financial centers, 3 small financial centers located in 36 settlements in the country.

2. Preparation basis

The financial statement was approved by the Management Board of the Bank for publishing on March 30th 2021. The Bank presents comparative information in this financial statement for one year back. In addition, the Bank applies its accounting policies consistently, unless otherwise stated. When necessary, comparative data are reclassified (and recalculated) to achieve comparability with changes in performance in the current year. The Bank presents its statement of financial position in the order of liquidity of the assets and liabilities.

Thesefinancial statements of the Bank have been prepared in accordance with International Financial Reporting Standards (IFRS) and interpretations issued by the Interpretation Committee (IFRIC) adopted by the European Union (EU). IFRS adopted by the EU is the generally accepted designation of a generic framework for fair presentation equivalent to the definition of the framework introduced in § 1 (8) of the Additional Provisions of the Accounting Act - International Accounting Standards (IAS)

3. Measurement Basis

The financial statements are prepared on a historical cost basis, except for financial assets at fair value through profit or loss, financial assets at fair value through other comprehensive income and defined benefit plans.

The financial statements have been prepared on a going concern basis.

The preparation of financial statements in conformity with IFRS requires the use of certain critical and accounting estimates. It also requires management of the Company to execute its judgment and assumptions. The areas involving a higher degree of judgment or complexity, or areas where assumptions and estimates are significant to the financial statements are disclosed in Note 7.

4. Functional currency and currency of presentation

This financial statement is presented in Bulgarian currency (BGN), which is the functional currency of the Bank. All amounts are and rounded up to thousand, unless otherwise stated.

5. Significant accounting policies

(a) Recognition of interest revenue and expense

Interest revenue and expense are recognized in profit or loss using the effective interest method. The effective interest rate is the one that accurately discounts the expected future cash payments and proceeds over the life of the financial asset or liability to the carrying amount of the asset or liability.

The calculation of the effective interest rate includes all fees and commissions received or paid which are an integral part of the effective interest rate. Transaction costs are intrinsic costs directly attributable to the acquisition and issue of a financial asset or liability.

Interest revenue and expense presented in profit or loss include:

- interest on financial assets and liabilities at amortized cost calculated using the effective interest method;
- interest on financial assets at fair value through other comprehensive income (FVOCI) and financial assets at fair value through profit and loss (FVPL).

(b) Foreign currency transactions

Transactions in a foreign currency are stated in functional currency at the exchange rate ruling on the date of the transaction. Monetary assets and liabilities denominated in a foreign currency are stated in the functional currency at the closing exchange rate on the financial position statement drafting date.

Exchange rate differences arising from monetary items are the difference between the amortized cost in a functional currency at the beginning of the period, adjusted for effective interest and payments over the period, and the amortized cost in foreign currency translated at the end of the period. Non-monetary assets and liabilities denominated in foreign currencies that are reported at fair value are translated into the functional currency at the rate at the date that the fair value was determined.

Exchange differences arising on the translation in the functional currency are recognized in profit or loss except for differences arising on the translation of available-for-sale equity instruments.

Since 1998 the exchange rate of the Bulgarian lev (BGN) has been fixed to Euro (EUR). The exchange rate is BGN 1.95583 / EUR 1.0.

5. Significant accounting policies (continued)

(c) Fees and commissions

***IFRS 15** Revenue from Contracts with Customers*

IFRS 15 establishes a comprehensive framework for determining whether, how much and when revenue is recognized. The tandard is based on the principle that revenue is recognized when the control of the good or service is transferred to the client.

IFRS 15 is only applicable to contracts where a contract counterparty is a party that can be identified as a customer in accordance with the requirements of the Standard.

Additionally, the new revenue standard provides guidance on accounting for certain costs of obtaining / performing the contract. Under IFRS 15, these costs are capitalized and should be recognized as an asset under contracts with customers only if they: (a) are made in relation to and pertain to a client contract that is within the scope of IFRS 15; (b) are not included in other IFRSs; and (c) are directly related to the contract, help generate resources for use in the course of the contract and are expected to be recovered.

Revenue from fees and commissions

The Bank realizes revenue from fees and commissions that are formed from performance and asset management. Fee and commission revenue arises from:

- Cash transactions and cash transfers
- Guarantees and letters of credit
- Loans
- Bank cards
- Other.

The current accounting policy provides for the management fees mentioned above to be recognized when providing the services. Performance fees are recognized as revenue after the end of the respective reference period.

(d) Net income from trade operations

Net trading income consists of gains less losses on assets and liabilities in trading portfolio and includes all realized and unrealized changes in fair value, interest, dividends and exchange differences.

(e) IFRS 9 Financial Instrument

(i) Recognition, classification and assessment – financial assets

IFRS 9 contains a new classification and measurement approach for financial assets that reflects the business model in which assets are managed, as well as their cash flow characteristics.

IFRS 9 includes three principal classification categories of financial assets: at amortized cost, at fair value through other comprehensive income (FVOCI) and at fair value through profit or loss (FVPL).

A financial asset is measured at amortized cost if it meets both of the following conditions and is not classified under FVPL:

5. Significant accounting policies (continued)

(e) IFRS 9 Financial Instrument (continued)

(i) Recognition, classification and assessment – financial assets (continued)

- the financial assets is held within a business model whose purpose is to hold assets in order to collect the contractual cash flows; and

- according to the contractual terms of the financial asset, cash flows arise at specific dates, which are only payments on principal and interest on the outstanding amount of the principal.

A financial asset is measured at FVOCI if it meets both conditions and is not classified under FVPL:

- the financial asset is held within a business model that targets both the collection of contractual cash flows and the sale of financial assets; and

- according to the contractual terms of the financial asset, cash flows arise at specific dates, which are only payments on principal and interest on the outstanding amount of the principal.

Upon the initial recognition of an equity instrument that is not held for trading, the Bank may take an irrevocable decision to present subsequent changes in fair value in other comprehensive income. This decision is made for each particular investment. All financial assets that are not classified as measured at amortized cost or at FVOCI as described above are measured at FVPL. In addition, upon initial recognition, the Bank may take an irrevocable decision and designate a financial asset that otherwise qualifies for measurement at amortized cost or at FVOCI, as measured at FVPL. if this would remove or reduce substantially the accounting mismatch, would have arisen.

Financial assets are classified in one of these categories at initial recognition.

Assessment of business model

The Bank will assess the purpose of the business model within which the financial asset is held at the portfolio level as it provides the best insight into how business is managed and how information is provided to management. The information to be considered includes:

- the policies and goals for the portfolio and the impact of these policies in practice, including whether the management strategy focuses on earning interest on contractual interest by maintaining a certain interest profile by comparing the term of the financial assets with the maturity of the liabilities that finance these assets , or on the realization of cash flows through the sale of assets;

- how the portfolio's performance is evaluated and reported to the management of the Bank;

- the risks that affect the performance of the business model (and the financial assets held within that business model) and how these risks are managed;

- how the compensation of managers is determined - eg. whether the it is based on the fair value of the assets under management or the contractual cash flows collected; and

- the frequency, volume and moment of sales of financial assets in prior periods, the reasons for such sales and expectations of future sales. Sales information is not considered in itself, but as part of the overall assessment of how the entity's stated objective of managing financial assets and how cash flows are being met.

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(i) Recognition, classification and assessment – financial assets (continued)

Assessment of business model(continued)

Financial assets held for trading and those that are managed and whose results are measured at fair value will be measured at FVPL because they are neither held for the purpose of collecting contractual cash flows nor for the purpose of both collecting contractual cash flows and sales of financial assets.

Estimating whether contractual cash flows are only principal and interest payments

For the purposes of this estimate, the "principal" is determined as the fair value of the financial asset at initial recognition. “Interest" includes the remuneration for the value of money over time and for credit risk associated with the outstanding principal amount over a certain period of time and for other major credit risks and costs (eg. liquidity risk and administrative costs) and a margin of profit.

In assessing whether contractual cash flows are only principal and interest payments, the Bank examines the contractual terms of the instrument. This includes assessing whether the financial asset contains a contractual clause that could change the time or value of the contractual cash flows so that they do not meet this condition. In this assessment, the Bank examined:

- contingency events that would change the amount or timing of cash flows;

- characteristics of leverage;

- conditions for extension and early repayment;

- conditions that restrict the Bank's claims to cash flows from certain assets (such as non-regression features).

- characteristics that alter the return for the value of money over time - e.g. periodic recalculation of interest rates.

The interest rates of certain loans to individuals granted by the Bank are based on standard floating rates (SFRs), which are determined at the Bank's discretion. The Bank will assess whether the SFR meets the IASB criterion by examining a number of factors, including:

- whether the borrower can repay early loans without significant penalties;

- whether market competition guarantees comparable interest rates between banks; and

- whether regulatory frameworks or consumer protection frameworks are in place that oblige banks to treat their customers fairly.

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(i) Recognition, classification and assessment – financial assets (continued)

All loans provided by the Bank contain early redemption features. The early amortization feature meets the IASB criterion if the amount of early repayment is essentially the sum of the principal outstanding and the interest on the principal outstanding amount that may include reasonable compensation for early termination of the contract.

Estimating whether contractual cash flows are only principal and interest payments (continued)

In addition, the early repayment feature is deemed to meet this criterion if the financial asset is acquired or created at a premium or a discount on the contractual nominal amount, the amount of the early repayment is essentially the contractual nominal amount plus the accrued (but not paid) contractual interest which may also include reasonable compensation for early termination), and the fair value of the early amortization provision is insignificant on initial recognition.

(ii) Impairment - financial assets, loan commitments and financial guarantee contracts

IFRS 9 requires application of "expected credit loss" (ECL) model. This requires substantial judgment on the way changes in economic factors are reflected in ECL, which is determined on a probability-weighted basis. The new impairment model is applied to the following financial assets which are not measured at FVPL:

- financial assets comprising debt instruments;
- lease receivables; and
- loan commitments and financial guarantee contracts (previously the impairment was determined in accordance with IAS 37 Provisions, Contingent Liabilities and Contingent Assets).

According to IFRS 9, impairment losses are not recognized for equity securities.

IFRS 9 requires recognition of a correction of losses amounting to 12-month ECL and lifetime ECL of the instrument. Lifetime ECL for the instrument is ECL arising from all possible cases of non-performance throughout the expected duration of a financial instrument, and 12-month ECL is the part of ECL derived from cases of non-performance which may occur within 12 months after the reporting date.

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(ii) Impairment - financial assets, loan commitments and financial guarantee contracts (continued)

The Bank recognizs a correction for lifetime ECL except in the following cases where the recognized amount will be a 12-month ECL:

- debt investment securities that have low credit risk as of the reporting date. The Bank believes that a debt security has a low credit risk when the credit risk is equivalent to the globally accepted definition of "investment grade"; and.

- other financial instruments (other than leases) for which the credit risk has not increased significantly since initial recognition.

Loss adjustments for lease receivables are always valued at an amount equal to ECL over the expected life of the instrument.

The impairment requirements of IFRS 9 are complex and require management appraisals, estimates and assumptions, especially in the following areas, which are discussed in detail below:

- assessing whether the instrument's credit risk has increased significantly since initial recognition; and

- inclusion of information for future periods in the evaluation of the ECL.

Evaluation of ECL

ECL is the probability-weighted estimated credit loss and will be determined as follows:

- *financial assets that do not have credit impairment at the reporting date:* the present value of the entire cash deficit - ie. the difference between the cash flows due under the contract and the cash flows that the Bank expects to receive;

- *financial assets that have credit impairment at the reporting date:* the difference between the gross carrying amount and the present value of the expected future cash flows;

- *unutilized credit commitments:* the present value of the difference between the contractual cash flows payable to the Bank if the commitment is utilized and the cash flows that the Bank expects to receive; and

- *financial guarantee contracts:* the present value of the expected payments of compensation to the holder minus any amount the Bank expects to repay.

Financial assets that have credit impairment are determined using IFRS 9 similar to those that are impaired under IAS 39.

Definition of default

Under IFRS 9, the Bank will assume a financial asset is in default when:

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(ii) Impairment - financial assets, loan commitments and financial guarantee contracts (continued)

Definition of default (continued)

- the borrower is unlikely to fulfill its credit obligations to the Bank in its entirety, without recourse by the Bank to actions such as the realization of the collateral (if any); or

- the borrower is over 90 days in arrears for any credit liability to the Bank. Overdrafts are considered overdue when the customer exceeds the specified limit or has a limit lower than the current amount due.

The definition largely corresponds to the definition of regulatory objectives.

In assessing whether the borrower is in default, the Bank will report indicators that are:

- qualitative: e.g. breach of clauses;

- quantitative: e.g. overdue status and non-payment of other liabilities by the same issuer to the Bank;

- based on data received internally or externally.

Input information in the assessment of whether a financial instrument is defaulted and its significance may change over time to reflect changes in circumstances.

Significant increase in credit risk

Under IFRS 9, when assessing whether a credit risk (e.g. a default risk) of a financial instrument has increased significantly since initial recognition, the Bank will consider reasonable and reasoned information that is relevant and available without undue expense or effort, including qualitative and quantitative information; an analysis based on past experience, expert credit assessment and future information.

The Bank will determine whether there has been a significant increase in the credit risk of a particular exposure mainly by comparing:

- the probability of default (PD) for the remaining term of the instrument at the reporting date; and

- the probability of default for the remaining duration of the instrument that was determined at the initial recognition of the exposure.

Assessing whether credit risk has increased significantly since the initial recognition of the financial instrument requires the determination of the date of initial recognition of the instrument. For certain revolving products (eg credit cards and overdraft), it may have been a long time since the date they were concluded. Modification of the contractual terms of the financial instrument may also influence this assessment as described below.

Credit risk levels

The Bank will determine the level of credit risk for each exposure based on a variety of data that is determined to predict the risk of default and applying credit based on experience. The Bank will use these levels in determining the existence of significant credit risk increases under IFRS 9. Credit risk levels are defined by qualitative and quantitative factors that are indicative of the risk of default. These factors may vary according to the nature of the exposure and the type of borrower.

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(ii) Impairment - financial assets, loan commitments and financial guarantee contracts (continued)

Credit risk levels (continued)

Credit risk levels are determined and calibrated so that the risk of default increases exponentially with the credit risk deterioration - eg. the difference in default risk between credit risk level 1 and 2 is less than the difference between credit risk level 2 and 3.

For each exposure, a credit risk level at initial recognition will be determined on the basis of available information about the borrower. Exposures are subject to constant monitoring, which may lead to a shift of exposure to another level. Credit risk levels are the main input in determining the time structure of the probability of default. The Bank will collect information on the performance and non-performance of its exposures to credit risk, analyzed by jurisdiction, by product type and by the borrower, and by the level of credit risk. For some portfolios, information purchased from external credit information agencies can also be used.

The Bank will use statistical models to analyze the collected data and generate estimates of default probability for the remaining exposure period and how it is expected to change over time.

Generating a term structure for probability of default

This analysis involves identifying and calibrating the relationship between changes in default rates and changes in key macroeconomic factors as well as an in-depth analysis of the impact of certain other factors (eg, the existence of restructuring) on the risk of default. For most exposures, key macroeconomic factors include:

- CPI – Inflation measured using the harmonized consumer price index, average annual change, (%).
- GDP - production method
- Unemployment – Unemployment rate, seasonally weighted data, monthly
- Interest rates

For exposures to certain industries and / or regions, the analysis expands to the relevant commodity and / or real estate prices. The Bank's approach to the inclusion of future information in this assessment is described below.

Determining whether credit risk has increased significantly

The Bank has defined a framework that includes both qualitative and quantitative information to determine whether the credit risk of a particular financial instrument has increased significantly since initial recognition. The framework is in line with the Bank's internal credit risk management process. The criteria for determining whether the credit risk has increased significantly varies according to the portfolio and includes a default mechanism.

The Bank will consider the credit risk of a particular exposure substantially increased after initial recognition if, based on quality modeling performed by the Bank, the probability of default for the remaining time is determined to be increased after initial recognition under the accounting policy adopted. When assessing the increase in the credit risk, the ECLs are adjusted against the changes in maturity.

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(ii) Impairment - financial assets, loan commitments and financial guarantee contracts (continued)

Determining whether credit risk has increased significantly (continued)

In certain cases, relying on expert judgment and, where possible, relevant past experience, the Bank may determine that a particular exposure has suffered a significant increase in credit risk if specific qualitative factors indicate this and these indices cannot be fully and timely covered by the quantitative analysis. As a safeguard mechanism and in line with IFRS 9, the Bank accepts that there is a significant increase in credit risk when the asset was past due for no more than 30 days. The Bank sets the days past due by counting the days after the earliest expired term against which no payment was received.

The Bank monitors the effectiveness of the criteria used to identify significant credit risk increases through regular reviews confirming that:

- the criteria are capable of identifying significant increases in credit risk before exposures are defaulted;

- the criteria do not coincide with the time at which the asset becomes past due by 30 days;

- the average period between identifying a significant increase in credit risk and default seems reasonable;

- exposures in general are not transferred directly from the 12-month ECL to credit impairment;

- there is no unjustified volatility in the correction of losses from transfers between 12-month ECL and lifetime ECL of the instrument.

Modified financial assets

The contractual terms of credit may be modified for many reasons, including changes in market conditions, customer retention, and other factors that are not related to current or potential deterioration in the client's solvency. An existing credit, the terms for which it has been modified, may be derecognized and the renegotiated credit recognized as a new credit at fair value.

Under IFRS 9, when the condition of the financial asset is modified and the modifications do not lead to write-off, determining whether the credit risk of the asset has increased significantly reflects a comparison between:

- the probability of default for the remaining duration of the instrument on the basis of the modified conditions; with

- the probability of default for the remaining duration of the instrument on the basis of the data at initial recognition and the original contractual terms

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(ii) Impairment - financial assets, loan commitments and financial guarantee contracts (continued)

Modified financial assets, continued

The Bank renegotiates loans to clients who have financial difficulties (called "restructuring practices") in order to maximize the possibilities for collecting claims and to minimize the risk of default. Under the Bank's Restructuring Policy, this is allowed selectively if the debtor is currently in default or if there is a high risk of default if there is evidence that the debtor has made all reasonable efforts to pay according to the original contractual terms and conditions expects the debtor to be able to comply with the revised terms.

Renegotiated terms typically include extending maturity, changing interest payment times, and changing loan terms. Both corporate and corporate loans are subject to restructuring. The Bank's Credit Committee frequently reviews the restructuring reports.

For financial assets modified as part of the Bank's Restructuring Policy, the probability of default will reflect the extent to which the modification has improved or restored the Bank's ability to collect interest and principal and prior experience with the Bank in respect of such restructuring activities. As part of this process, the Bank will assess the performance of the borrower's payments under the modified contractual terms and consider different behavioral indicators.

Overall, restructuring is a qualitative indicator of default and credit impairment, and expectations of restructuring are relevant in assessing whether there is a significant increase in credit risk. After the restructuring, the client must demonstrate a regular payer's behavior for a certain period of time before the exposure ceases to be considered a default / credit impairment, or the probability of default has declined so that the loss correction is again measured in the 12-month ECL.

Input information for the estimation of ECL

The key input to the estimation of ECL includes the term structure of the following variables:

- Probability of default (PD)

- Loss given Default (LGD); and

- Exposure at Default (EAD).

These parameters will be derived from internally developed statistical models and other background data that affect regulatory models. They will be adjusted to reflect future information as described below.

PD estimates are estimates at a certain date that will be calculated based on statistical rating models and will be evaluated using rating instruments tailored to different categories of counterparties and exposures. These statistical models will be based on internally compiled data containing qualitative and quantitative factors. Where available, market data can also be used to determine PD for large corporate counterparties. If a counterparty or exposure migrates between categories, this leads to a change in the PD estimate. PDs are calculated in terms of contractual maturities of the exposures and the expected repayment rates.

The LGD is the amount of the alleged loss given default. The Bank determines the parameters of LGD based on the history of the level of recovery of receivables from non-performing counterparties. LGD models take into account the structure, collateral, order of receivables, counterparty industry, and collateral security costs that are part of the financial asset. For loans

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(ii) Impairment - financial assets, loan commitments and financial guarantee contracts (continued)

Input information for the estimation of ECL, continued

secured by commercial property, the credit value / collateral value coefficients will be a key parameter in the determination of LGD. LGD estimates are calibrated for different economic scenarios and for real estate loans to reflect possible changes in property prices. They are calculated on the basis of discontinued cash flows using the effective interest rate for the discount rate. EAD is the expected exposure in the event of a default.

The Bank determined the EAD from the current exposure to the counterparty and the potential changes in the current amount authorized under the contract, including amortization and early repayment. The EAD of the financial asset will be the gross carrying amount at the default date. For credit commitments and financial guarantees, the EAD recognizes the amount utilized, as well as potential future amounts that may be utilized or repaid under the contract that will be provided on the basis of past and forward looking observations. For some financial assets, the Bank may designate an EAD by modeling the set of possible exposure outcomes at different times in time using scenarios and statistical techniques.

As described above, and provided that maximum 12 month PD is used for financial assets whose financial risk has not increased significantly, the Bank assesses the ECL by considering the default risk for the maximum duration of the contract (including the possibility of prolongation on the part of the borrower) for which he is exposed to credit risk, even if the Bank considers a longer period for the purposes of risk management. The maximum term of the contract extends to the date on which the Bank is entitled to request repayment of the advance or to terminate a credit commitment or guarantee.

For consumer overdraft and credit cards and certain corporate revolving products that include credit and commitment for undrawn amounts, the Bank assesses the ECL for a period longer than the maximum term of the contract if the Bank's contract law requires repayment or cancellation of the uncommitted commitment limits the exposure of the Bank to credit losses up to the contractual period of notice. These products do not have a fixed term or repayment structure and are managed collectively. The Bank may cancel them with immediate effect, but this right does not apply to normal day-to-day management, but only when the Bank becomes aware of an increase in credit risk at the product level. The longer period will be assessed taking into account the credit risk management measures that the Bank intends to undertake to reduce the ECL. These include lowering the limit and canceling the product.

When modeling a particular parameter is done collectively, the financial instruments will be grouped on the basis of common risk characteristics that include:

- instrument type
- credit risk level;
- type of collateral;
- value of the loan / collateral value;
- date of initial recognition,
- remaining time to maturity;
- branch; and
- geographical location of the borrower.

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(ii) Impairment - financial assets, loan commitments and financial guarantee contracts (continued)

Input information for the estimation of ECL, continued

Grouping is subject to regular review in order to ensure that exposures in a given group remain homogeneous.

For portfolios for which the Bank has limited past performance data, external reference information will be used to supplement available internal data.
Portfolios for which the external reference information represents a significant input in the evaluation of the ECL are:

	External reference benchmarks used	
	PD	**LGD**
measured at amortized cost (AMORTCOST)	Studies by Fitch, S&P and other licensed agencies on default	Studies by Fitch, S&P and other licensed agencies on default
Reported at fair value in other comprehensive income (FVOCI);	Studies by Fitch, S&P and other licensed agencies on default	Studies by Fitch, S&P and other licensed agencies on default

Information for future periods

Under IFRS 9, the Bank will include future-time information, both in its assessment of whether the credit risk of a particular instrument has increased significantly after initial recognition and in the evaluation of the ECL. The Bank will formulate a "baseline scenario" for the future development of the relevant economic variables and a representative set of other possible scenarios based on an opinion from the Bank's Risk Committee and economic experts and a variety of up-to-date and forecasted external information. This process will involve developing two or more additional economic scenarios and considering the relative probabilities of each result.

External information may include economic data and forecasts published by state and monetary authorities, superstate organizations such as the Organization for Economic Cooperation and Development and the International Monetary Fund, and selected experts from the private and academic sector.

The baseline scenario will represent the most probable outcome and will be consistent with the information used by the Bank for other purposes, such as strategic planning and budgeting. Other scenarios will be more optimistic and more pessimistic. The Bank will also perform periodic stress tests for more extreme shocks to calibrate the determination of these different representative scenarios.

The Bank has identified and documented key credit risk factors and credit losses for each portfolio of financial instruments, and using historical data analysis, has roughly estimated the relationship between macroeconomic variables and credit risk and credit losses. These key factors include interest rate, unemployment rates and GDP projections. The projected relationships between key indicators and default and loss levels of different portfolio of financial assets have been developed on the basis of data analysis for the past 5 years.

The economic scenarios used were approved by the Bank's Management Board.

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(iii) Classification - Financial Liabilities

According to IFRS 9 changes in the fair value of the liabilities measured at FVPL will be presented as follows:

- the portion of the change in fair value that is due to changes in the credit risk of the liability is reflected in other comprehensive income,

- the rest of the change is reflected in profit or loss.

(iv) Deletion and modification of contracts

The Bank derecognises a financial asset when the contractual rights to the cash flows from the financial asset expire or when it transfers the rights to receive the contractual cash flows from the financial asset into a transaction in which all significant risks and rewards of ownership of the financial asset are transferred. Any interest in transferred financial assets that is created or maintained by the Bank is recognized as a separate asset or liability.

The Bank derecognizes a financial liability when its contractual obligations are fulfilled, canceled or when they expire.The Bank carries out transactions that transfer assets recognized in the statement of financial position but retain all or all of the material risks and rewards of the transferred assets or part of them. If some or all of the material risks and rewards are retained, the transferred assets are not derecognised from the statement of financial position. Transferring assets with retaining some or all of the material risks and gains are, for example, securities lending or repurchase transactions.

When a third party sells swap assets with a uniform total return on the transferred assets, the transaction is accounted for as a secured financial transaction similar to a repurchase transaction.

For transactions in which the Bank neither retains nor transfers all material risks and gains from the possession of a financial asset, it derecognises the asset if it does not retain control over it. Rights and obligations retained in the transfer are separately recognized as assets and liabilities respectively.

For transactions that retain control of the asset, the Bank continues to recognize the asset to the extent of its interest, depending on how exposed it is to changes in the value of the transferred asset.

In certain transactions, the Bank retains its obligation to service the transferred financial asset for consideration. The transferred asset is derecognized entirely if it meets the derecognition criteria.

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(iv) Deletion and modification of contracts (continued)

The asset or liability is recognized in the service contract depending on whether the service charge is more than sufficient (asset) or less than sufficient (liability) to perform the service.

(v) Offset

Financial assets and liabilities are offset and the net amount is recognized in the statement of financial position when and only when the Bank has a legally enforceable right to offset the recognized amounts and intends to settle the asset and liability on a net basis. Revenue and expense are presented in net only in the cases permitted by accounting standards or by gains and losses that arise from a group of similar transactions such as those arising from the Bank's operations.

(vi) Impact on capital planning

The main impact on the Bank's regulatory capital s from the application of IFRS 9 will arise from the new impairment requirements.

Under the current regulatory requirements, impairment losses are treated differently depending on whether a particular portfolio falls within the IRB or Standardized Approach.

The Bank applies a standardized approach. The capital requirement is calculated on the basis of the gross exposure, net of specific provisions - ie. net exposure. IFRS 9 is expected to increase write-downs related to individual assets, therefore the net exposure and the capital requirement will be reduced. However, this reduction in the capital requirement will be exceeded by the increased loss adjustments under IFRS 9 of the capital resources.

(vii) Measured at amortized cost

The amortized cost of a financial asset or liability is the amount by which a financial asset or liability is measured at initial recognition minus principal repayments plus or minus cumulative amortization using an effective interest rate for the difference between the initially recognized amount and the amount of the maturity minus the cost for impairment.

(viii) Principles of fair value measurement

Fair value is the price that would be received from the sale of an asset or be paid to transfer a liability in an orderly transaction between market participants at the measurement date on the main market for the Bank or in the absence thereof, in the most advantageous market to which the Bank has access at that date. The fair value of a liability reflects the risk of breach of an obligation.

Whenever possible, the Bank shall measure the fair value of an instrument using quoted prices in an active market for that instrument. The market is considered as active when the transactions for the asset or liability are executed with enough frequency and volume so that it allows the provision of actual information on prices.

If there is no stock market price in an active market, the Bank uses valuation techniques (such as discounted cash flows and comparison with similar instruments) by maximally using appropriate observable incoming data and minimizing the use of observable ones. The chosen valuation technique covers all the factors that market participants would take into account when pricing the deal.

5. Significant accounting policies (continued)

(e) IFRS 9 *Financial instruments*, continued

(viii) Principles of fair value measurement, (continued)

The best evidence of a fair value of a financial instrument at initial recognition is the price of the transaction (i.e. the fair value of the remuneration received or given). If the Bank determined that the fair value at initial recognition differs from the transaction price and there is no evidence of fair value through stock exchange price of a similar asset or liability, either it is based on a valuation technique that uses data from observable markets, then the financial instrument initially measured at fair value, adjusted to defer the difference between the fair value at initial recognition and the transaction price. Subsequently, the difference is recognized in profit and loss rescheduled of an appropriate basis for the life of the instrument, but no later than the time when the assessment can be entirely supported by observable market data or transaction is completed.

The fair value of a call deposit is not less than the amount due on demand deducted from the original date on which the deposit may become chargeable. The Bank shall disclose the transfer between the levels in the fair value hierarchy at the end of the reporting period of the change occurrence.

f) Financial assets measured at amortized cost:

A financial asset is measured at amortized cost if compliant with the requirements:

- the financial asset is held in a business model whose purpose is to hold assets in order to collect the contractual cash flows; and
- under the contractual terms of the financial asset at specific dates cash flows arise, which are only principal payments and interest on the outstanding amount of the principal.

This group includes loans, purchased bonds, deposits with banks and other forms of debt financing held by the bank that are held for the purpose of obtaining the contractual cash flows.

g) Financial assets reported at fair value in other comprehensive income

Financial assets are held within a business model that targets both the collection of contractual cash flows and sales of financial assets, and according to the contractual terms of financial assets at specific dates, cash flows arise, which are only principal and interest payments on the outstanding principal amount.

5. Significant accounting policies, (continued)

g) Financial assets reported at fair value in other comprehensive income (continued)

This group includes debt instruments measured at fair value in other comprehensive income and equity instruments without subsequent reclassification of changes in the deferred income statement.

h) Financial assets reported at fair value through profit and loss.

All other financial assets that are not classified in the above two categories are measured at fair value through profit or loss of debt instruments measured at fair value through profit or loss.

Depending on the classification of the financial assets, for the purpose of their subsequent measurement, the differences arising from the change in their value are recognized in profit or loss or other comprehensive income. Recognition of differences from the subsequent evaluation is performed only on assets that are measured at fair value. In summary, the subsequent evaluation of financial assets is presented in the following table

Categories of financial assets	**Subsequent evaluation**	**Recognition of differences of subsequent evaluation**
Financial assets, measured at amortized cost	Amortized cost	The value of the asset is sequentially brought to its amortized cost at cost
Financial assets measured by fair value in other comprehensive income	Fair value	In other comprehensive income
Financial assets measured at fair value through profit or loss	Fair value	In profit or loss

The Bank has not reclassified financial assets reported at fair value through profit and loss in other categories during the reporting period.

(i) IFRS 16 Lease

(i) Leases – the Bank as a Lessee

Leases are recognized as a right-of-use asset and a corresponding liability at the date at which the leased asset is available for use by the Bank. Each lease payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the lease period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period. The right-of-use asset is depreciated for the lease term on a straight-line basis.

The right-of-use asset is presented separately on the statement of financial position, except for right-of-use assets that meet the definition of investment property which is presented on the statement of financial position as a separate line item – "investment property".

Assets and liabilities arising from a lease are initially measured on a present value basis. Lease liabilities include the net present value of the following lease payments:

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

5. Significant accounting policies, (continued)

(i) IFRS 16 Lease, (continued)

(i) Leases – the Bank as a Lessee, (continued)

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

Each lease payment is allocated between the liability and finance cost. Lease liabilities are subsequently measured using the effective interest method. The carrying amount of liability is remeasured to reflect any reassessment, lease modification or revised in-substance fixed payments.

The lease term is a non-cancellable period of a lease, periods covered by options to extend and terminate the lease are only included in the lease term if it is reasonably certain that the lease will be extended or not terminated.

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

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

Subsequently, the right-of-use assets,are measured at cost less accumulated depreciation and any accumulated impairment losses, and adjusted for remeasurement of the lease liability due to reassessment or lease modifications.

The right-of-use assets are depreciated over the lease term on a straight-line basis.

Payments associated with short-term leases and leases of low-value assets are recognized on a straight-line basis as an expense in profit or loss. The Bank applies the exemption for low-value assets on a lease-by-lease basis. For the leases where the asset is sub-leased, a right-of-use asset is recognised with corresponding lease liability. For all other leases of low value asset, the lease payments associated with those leases will be recognised as an expense on a straight-line basis over the lease term. Short-term leases are leases with a lease term of 12 months or less. Low-value assets comprise parking areas, ATM areas, IT-equipment and other.

(iii) The Bank's leasing activities

The Bank leases various types of assets - administrative offices and buildings, IT equipment, vehicles, and other small equipment. Leases are negotiated on an individual basis and contain a wide range of different terms and conditions (incl. termination and renewal rights). The main lease features are summarised below:

• Aadministrative offices and buildings are rented for a fixed period of 1 to 10 years and the terms are individualy defined. The contracts contain an option to renew the lease. The lease payments are usually fixed and in some cases there are clauses for annual review and update of payments, related to a defined index. Chanes in contract terms are duly signed with Annex.
rented out to the related party (see further information in the Note 5).
• The vehicles are leased for a fixed period of 1 year, with an extension option.
• IT equipment is leased for a fixed period of 2 years.

The lease agreements do not impose any covenants, but leased assets may not be used as security for borrowing purposes.

5. Significant accounting policies, (continued)

(i) IFRS 16 Lease, (continued)

(ii) Extension and termination options

Extension and termination options are included in a number of property and equipment leases across the Bank. These are used to maximise operational flexibility in terms of managing the assets used in the Bank's operations. For critical judgements in determining the lease term, please refer to Note 7.

i(v) Short-term leases

Leases of administrative offices and buildings, IT equipment, vehicles are short-term leases and the costs are recognised on a straight-line basis during the reporting period. The total cost of short-term leases is disclosed in Note 38. The total amount of Bank's lease commitments for short-term leases equals to BGN 171 thousand (31.12.2019 – 165 thousand) .

(v) Leases – th Bank as lessor

When the Bank is a lessor in lease contract, transfering substantially all the risks and rewards from the right-of-use asset, then a finance lease is recognized amounting the net investment made by the Bankта and presented as loans and advances to clients.

(j) Loans and advances

Loans and advances are non-derivative financial instruments with fixed or determinable payments that are not quoted in an active market and which the Bank does not intend to sell immediately or in the near future.

Loans and advances to banks are classified as loans and receivables. Loans and advances to clients include:

- those classified as loans and receivables;
- receivables under a finance lease
- receivables under factoring contracts;
- receivables under cash pool agreements.

Loans and advances are initially recognized at fair value, including the initial direct cost of acquiring the assets. Upon subsequent evaluation, loans and advances are stated at amortized cost on an effective interest rate basis.

When a bank acquires a financial asset and simultaneously concludes a reverse repurchase agreement (or similar instrument) at a fixed price at a future date (reverse repurchase agreement), the agreement is accounted for as a loan or advance and the asset subject to collateral is not recognized in the statement of financial position.

(k) Receivables under factoring contracts

Factoring is a transfer of one-off or recurring claims arising from the supply of goods or the provision of services. Receivables arising from factoring include non-derivative financial assets with fixed or determinable payments that are not traded on an active market.

5. Significant accounting policies, (continued)

(k) Receivables under factoring contracts, (continued)

The Bank recognizes its receivables on factoring depending on the extent of the risks and rewards of ownership of the transferred asset.

In the case of a factoring contract without regression, the contract client transfers substantially all the risks and rewards of ownership of the financial asset to the Bank. In this case, the Bank recognizes and reports in the financial statements the transferred receivable in its entirety as a financial asset.

Under a factoring agreement with regression, the risk of the transferred asset is retained by the client under the contract. The transfer of the claim in this case is not a sufficient condition for the derecognize \the financial instrument sold to the client under a factoring contract. At the Bank, receivables under factoring agreements with regression are recognized and recognized in the financial statements up to the amount of the amount paid, representing an advance to the clients with whom factoring contracts have been concluded. Upon initial recognition of the receivables, the Bank assesses them at their fair value, including the costs directly attributable to the acquisition of the financial asset. In the reporting year 2019, the Bank has concluded domestic and export factoring contracts with and without regression.

The subsequent evaluation of claims depends on the original term of the factoring contract. If it is greater than a year, the receivable is measured at amortized cost using the effective interest method. For factoring contracts with a term of up to one year, as is customary practice, no amortized cost is applied, as this method has no significant effect in shorter terms.

At each reporting date, receivables are impaired on a simplified basis.

Undrawn limits on factoring contracts with regression are not recognized as a financial asset in the Bank's financial statements and are reported off-balance sheet.

(l) Property, plant and equipment

Property, plant and equipment are reported in the statement of financial position at their cost less accumulated depreciation and impairment losses.

Profit and losses from sale of property, plant and equipment are recognized in profit or loss.

Depreciation is accrued based on the straight line method, according to set norms for the purpose of the full depreciation of the value of property, plant and equipment for the expected period of use. The following are the annual depreciation rates used:

Assets	**%**
Buildings	4
Plant and equipment	20-30
Computers and computer equipment	20-50
Fixtures and fittings	10
Motor vehicles	25

Assets are not depreciated until they are put into operation and / or transferred from the cost of acquiring fixed assets in the relevant asset category.

The depreciation methods, the useful life and the residual values of property plant and equipment are reassessed at each reporting date and should be corrected if appropriate.

5. Significant accounting policies, (continued)

(m) Intangible assets

Intangible assets acquired by the Bank are presented at cost, less the accrued depreciation and impairment loss.

Expenditure on internally generated intangible assets is recognized as an asset when the Bank demonstrates the ability to complete the asset, its use results in future economic benefits, and its value can be reliably measured.

Subsequent costs are capitalized only when they increase the future economic benefit of the specific asset to which they relate. All other future expenses are recognized as expenses as they are incurred.

Depreciation is calculated on the basis of the straight-line method over the expected useful life.

The following are the annual depreciation rates used:

Intangible assets	%
Software and licenses	10-50
Other fixed intangible assets	10

The depreciation methods, the useful life and the residual values of intangible assets are reassessed at each reporting date and should be corrected if appropriate.

(n) Impairment of non-financial assets

The reporting amounts of the Bank's non-financial assets are reviewed at each reporting date in order to determine whether there are indications of impairment. If such indications exist, an estimate of the recoverable amount of the asset is made.

For the purpose of the impairment test, assets that cannot be tested individually are grouped together into the smallest possible group of assets generating cash proceeds from continuing use that are largely independent of the cash receipts from other assets or cash-generating unit (CGU).

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

An impairment loss is recognized if the carrying amount of an asset or a CGU exceeds its recoverable amount.

The impairment losses are recognized in profit and loss. They are allocated first to reduce the value of the goodwill allocated to the CGU and subsequently to reduce the carrying amount of the assets part of the CGU.

(o) Deposits and other borrowed funds

Deposits from customers and banks and attracted funds from public funds are the sources of the Bank to finance loans and advances. When the Bank sells a financial asset and simultaneously concludes a repurchase agreement for that (or similar) asset at a fixed price at a future date ("repo"), the agreement is accounted for as a deposit and the principal asset continues to be recognized in the Bank's financial statements.

Deposits and other borrowings are initially measured at fair value, including directly attributable transaction costs, and are subsequently measured at amortized cost using the effective interest method.

5. Significant accounting policies, (continued)

(p) Provisions

A provision is recognized in the statement of financial position when there is a present legal or constructive obligation as a result of past events and it is probable that an outflow of cash that can be reliably measured will be required to repay it. Provisions are determined by discounting future cash flows at a pre-tax discount rate that reflects the current market valuation of the time value of money and the specific risks for the respective liability.

(q) Income tax

The tax expense includes current and deferred taxes. It is recognized in profit or loss except when it pertains to items recognized directly in equity or in other comprehensive income.

Interest and penalties on income tax, including uncertain tax procedures, are reported in accordance with IAS 37 Provisions, Contingent Liabilities and Contingent Assets.

(i) Current taxes

Current tax is the expected tax payable or receivable on the taxable profit or loss for the year, using tax rates enacted or substantively enacted at the reporting date, and all correction to tax liabilities or receivables for previous years. The amount of the current tax liability or receivable is the best estimate of the amount of tax that is expected to be paid or received that reflects the income tax uncertainties.

(ii) Deferred taxes

Deferred tax are recognized on temporary differences between the amounts of assets and liabilities recognized in the financial statements and the amounts used for taxation purposes. Deferred tax are not recognized for:

- temporary differences on initial recognition of assets and liabilities in a transaction that is not a business combination and that affects profit or loss, neither accounting nor taxable;

- temporary differences related to investments in subsidiaries and jointly controlled entities, insofar as the Bank may control the timing of the reverse manifestation of the temporary differences and it is likely that they will not have a reversal in the foreseeable future

Deferred tax assets shall be recognized for unused tax losses, unused tax credits and deductible temporary differences, to the extent that it is probable future taxable profits will be available against which they can be used. Deferred tax assets are reviewed at each reporting date and reduced as long as future profits are unlikely to be realized and such rebates are restored when the probability of future taxable profits improves.

In the determination of current and deferred tax the Bank takes into account the impact of uncertain tax positions and whether additional taxes and interest may have been due. The Bank believes that the accruals for taxation liabilities are adequate for all open tax years based on the assessment of many factors, including interpretations of tax law and prior experience. This assessment is based on estimates and assumptions and may involve judgments about future events. It is possible new information becomes available whereby the Bank to change its judgment on the adequacy of existing tax liabilities; such changes to tax liabilities will impact tax expense in the period that such a determination be made.

5. Significant accounting policies, (continued)

(q) Income tax, (continued)

(ii) Deferred taxes, *(continued)*

Deferred tax is measured at the tax rates expected to apply to temporary differences when they occur back, based on laws that were in force or were essentially the reporting date.

The deferred tax assets and liabilities are compensated only if there is a legal basis for deduction of current tax assets and liabilities, and they relate to income taxes imposed by the same taxation authority.

(r) Staff benefits

(i) Short-term employee benefits

Payables for short-term employee benefits are recognized as an expense when related services are provided. A liability is recognized for the amount that is expected to be paid if the Bank has a legal or constructive obligation to pay that amount as a result of past service provided by an employee and the liability can be measured reliably.

(ii) Defined contribution plans

Contributions to defined contribution plans include contributions to government institutions and statutory pension funds managed by private management companies according to legal requirements or individual choice. The obligation to transfer contributions to defined contribution plans is recognized as an expense when the related services are provided.

(iii) Defined income plans

The Bank's obligation for defined benefit plans is limited to the statutory requirements for paying employees between two and six months of retirement depending on their length of service. The amount of the liability that the employee will receive is determined by his remuneration in previous and current periods, this amount being discounted at an appropriate discount rate, which represents the yield of bonds that have an appropriate credit rating and a maturity approximating the term of the Bank's obligation; which are denominated in the currency of the liability.

The calculation of defined benefit obligations is performed annually by a qualified actuary using the projected credit unit method. The Bank sets the net interest rate on the net defined benefit obligation net of the defined benefit plan using the discount rate used at the beginning of the period to discount the liability to a net defined benefit plan liability.

Revaluations arising from defined benefit plans are actuarial gains and losses that are recognized in other comprehensive income. Net interest expense and other expenses related to defined benefit plans are recognized in profit or loss.

(s) Assets acquired from collateral

Assets acquired from collateral are reported at their lower cost and net realizable value. Costs include costs of acquiring the asset, state fees for private enforcement agents, etc.

Net realizable value is the presumed selling price less the estimated costs necessary to realize the sale.

5. Significant accounting policies, (continued)

(t) New and amended standards adopted by the Bank

The Bank has applied the following standards and amendments for the first time for its annual reporting period beginning on January 1, 2020:

Amendments to References to the Conceptual Framework in IFRS Standards (issued on 29 March 2018 and effective for annual periods beginning on or after 1 January 2020);

Amendments to IAS 1 and IAS 8: Definition of Material (issued on 31 October 2018 and effective for annual periods beginning on or after 1 January 2020);

Amendments to IFRS 9, IAS 39 and IFRS 7: Interest Rate Benchmark Reform (issued on 26 September 2019 and effective for annual periods beginning on or after 1 January 2020)

Amendments to IFRS 3 Business Combinations (issued on 22 October 2018 and effective for acquisitions from the beginning of annual reporting period that starts on or after 1 January 2020);

Amendment to IFRS 16 Leases COVID 19-Related Rent Concessions (issued on 28 May 2020 and effective for annual periods beginning on or after 1 June 2020);

All changes of the adopted standards listed above have no impact on the amounts recognized in previous periods and are not expected to have a significant impact on the Company during the current or future reporting periods as well as in the foreseeable future transactions.

(u) New standards and interpretations not yet adopted by the Bank

Certain new accounting standards and interpretations that are not mandatory for the reporting period at 31 December 2020 and have not been previously adopted by the Bank have been published. The Company's assessment of the impact of these new standards and interpretations is set out below.

Amendments to IFRS 4 Insurance Contracts – deferral of IFRS 19 (issued on 25 June 2020 and effective for annual periods beginning on or after 1 January 2021);

Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16 Interest Rate Benchmark Reform – Phase 2 (issued on 27 August 2020 and effective for annual periods beginning on or after 1 January 2021).

There are no other standards that are not yet adopted, and which are expected to have a significant impact on the Company during the current or future reporting period as well as in the foreseeable future transactions.

(v) New standards, clarifications and amendments not yet adopted by the EU

IFRS 17 Insurance Contracts (issued on 18 May 2017 and effective for annual periods beginning on or after 1 January 2021); **including Amendments to IFRS 17** (issued on 25 June 2020);

Amendments to IAS 1 Presentation of Financial Statements: Classification of Liabilities as Current or Non-current and Classification of Liabilities as Current or Non-current - Deferral of Effective Date (issued on 23 January 2020 and 15 July 2020 respectively and effective for annual periods beginning on or after 1 January 2023);

5. Significant accounting policies, (continued)

(v) New standards, clarifications and amendments not yet adopted by the EU, (continued)

Amendments to IFRS 3 Business Combinations; IAS 16 Property, Plant and Equipment; IAS 37 Provisions, Contingent Liabilities and Contingent Assets; Annual Improvements 2018-2020 (issued on 14 May 2020 and effective for annual periods beginning on or after 1 January 2022).

6. Disclosure of the financial risk management policy

(a) Introduction and general

The Bank is exposed to the following types of risk in its operations with financial instruments:

- credit Risk
- liquidity risk
- market risk
- compliance with capital adequacy requirements

This appendix provides information about the Bank's exposures to each of the financial risks, the Bank's purposes, policies, and processes to measure and manage these risks.

General provisions of risk management

The Management Board is responsible for the preparation and implementation of the Bank's risk management general position. The Management Board selects the Asset and Liability Management Committee and the Risk Committee (RICO), which are responsible for the preparation and monitoring of the Bank's risk management policies in their specific areas. The Bank's risk management policies are designed to identify and analyze the risks faced by the Bank to provide appropriate risk and control limits and to observe compliance with these limits. The policies and systems for risk management are reviewed periodically in order to reflect changes on the market conditions, products and services offered.

The Specialized Internal Audit Service division monitors whether applied risk management policies are in compliance with the Bank's risk management policies, and also the extent to which the general principles of management match the acceptable risk for management.

(b) Credit Risk

When performing commercial operations, credit and investment activity, and also in cases where it plays the role of an intermediary on behalf of clients or other organizations and in its capacity as guarantor, Allianz Bank Bulgaria AD is exposed to credit risk.

Concentration of credit risk arises mainly depending on the sector of activity and the type of clients. There is also a risk of significant concentration of credit risk on financial instruments in counterparties with similar economic characteristics for the Bank, and therefore changes in economic and other conditions would have a similar effect on their ability to meet their contractual obligations .

Credit risk management

The Management Board of the Bank delegates the responsibility for managing the credit risk of the Executive Directors of the Bank, Credit Risk Division, Problem Loans and Collecting Division, Large Corporate Clients Division,Corporate Banking Division , Retail Banking Division, Sales Control Division, and the Credit council of the Bank.

6. Disclosure of the financial risk management policy (continued)

(b) Credit Risk, (continued)

Credit risk management, (continued)

The Management Board of the Bank formulates credit policies with the support of business units, taking into account the collateral, credit risk, valuation and legal requirements for documentary and legal justification. The Bank's Management Board determines the amount of competence to approve and renew credit transactions. Credit Risk Division prepares an opinion with a credit risk assessment for all credit exposures that exceed certain limits.

After issuing a credit risk assessment opinion, credits are submitted for review and approval by the Bank's competent authority.

Qualitative assessment is based on evaluation of indicators such as company history and ownership, management, credit history, professional experience, sectoral analysis, environmental assessment, etc. The Bank implements specialized software (Litis-POD) to generate a behavioral scoring model based on the borrower's credit history for corporate clients and individuals. Behavioral scoring is prepared for every individual and legal entity. As a factor in the specialized software of the bank was implemented the internal corporate rating model (MicroCap) and application scoring (Critesis).

The application rating is established based on a quantitative assessment (financial scoring) and a qualitative assessment of the borrower and his/her related persons. Financial scoring is calculated based on the latest available annual financial statements and calculation of the main financial ratios for the respective reporting period.

The Risk Controlling and Reporting Directorate performs "back testing" of the impairment model at least once a year. The distribution, the significance of the Kolmogorov-Smirnov coefficient and the Gini coefficient, as well as the achieved levels of default rates, are compared with the predictions (limits of the rating intervals). Any change in the structure of the model that results in a change in the individual credit ratings of the borrowers is approved by the Bank's RICO.

The Bank has implemented a dedicated Product Delivery System (PD) that covers the entire business process of the Retail Banking business, from the submission of the loan application, the processing of the request, the decision making, the signing of the loan agreement to the loan utilization. The system is designed to have separate modules for each product (mortgage loans, consumer credits, credit cards, etc.), with a separate set of indicators for each module. The system calculates a rating for credit risk assessment.

The Bank's Management board approves at the beginning of each calendar year and reviews the concentration of exposures by credit programs, sectors, sectors, types of clients, loan amount, maturity, etc., as well as issuers, credit rating, liquidity and state (for investment securities books).

The Credit Monitoring Department and the Restructuring - Centralization Department are responsible for managing the Bank's credit risk in respect of the review, assessment and classification of the Bank's risk exposures, depending on the allowed delay of due liabilities, according to the terms set in the Bank legislation and assessment of the debtor's financial condition and the sources of payment of his obligations, focusing the management's attention on the risk under consideration.

The aforementioned departments report to the Bank's Credit council.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management, (continued)

The Credit Monitoring Department performs a periodic review of the compliance of the business centers / financial centers with their credit limits, in compliance with the Bank's Rules and Procedures for Credit Activity. Periodic reports on the results of inspections and the quality of local portfolios are provided to the Executive Directors of the Bank. The Bank carries out ongoing monitoring, including an analysis of the debtor's financial position, depending on the amount of the total credit exposure of the borrower and the related parties, as follows: at least once a year for exposures up to BGN 500 thousand and twice a year for exposures exceeding BGN 500 thousand. and extraordinary monitoring in case of change in risk.

The bank monitors the value of accepted collateral real estate periodically - for commercial real estate at least once a year, and for residential real estate once every three years. The Bank also monitors more frequently when significant changes occur in market conditions. Accepted collateral for risk exposures in default are reassessed at least once a year. The collateral is revalued by an independent valuer by determining net realizable value. For loans exceeding EUR 3 million or 5% of the Bank 's equity, assessment of Real Estate is subject to review by a valuer at least once per year.

The Bank classifies the risk exposures according to the degree of credit risk in the following classification groups, in accordance with the adopted "Provisioning policy" - servicing exposures and default risk exposures.

The Credit council approves exposures of over BGN 0.5m, as well as restructuring of exposures above 0.25m BGN.

Services exposures

A risk exposure is classified as serviced if it meets the following conditions at the same time: the principal and interest are paid in accordance with the terms of the contract or with a delay of up to 90 days and there is no recorded default event.

Defaulting risk exposures

It is considered that a default has occurred in respect of a particular debtor where at least one of the following conditions is met:

- It is unlikely that the borrower will pay his/her credit liabilities to the Bank in full without taking of actions by the Bank, e.g. Realization of collateral, regardless of the size of overdue payment and days overdue;

- the borrower is over 90 days overdue for a substantial part of his/her credit liability to the Bank.

The classification of the risk groups is as follows:

“Regular" are risk exposures on loans and other receivables that are serviced and for which the debtor's financial statements do not give reason to doubt that he will fully settle his obligations.

“Under Supervision" exposures are risk exposures on loans and other receivables where there are minor breaches in their servicing or there is a possibility for a deterioration in the debtor's financial condition that may call into question the full repayment of the obligation.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management, (continued)

“Non-performing” exposures are risk exposures on loans and other receivables where there are significant breaches in their service, or there is evidence that the debtor's financial position is not stable, its current and expected receipts are insufficient to fully pay off its debts to the Bank and to other creditors, as well as when there are identified weaknesses with a clear possibility for the Bank to suffer a loss.

“Loss" exposures are risk exposures where, owing to a deterioration in the financial condition of the obligor, it is probable that its liabilities will become irrecoverable, even though they have a partial recoverable amount that can be realized in the future.

Risk exposures in default are classified as "non-performing" and "loss". The Bank assesses individually all individually significant risk exposures in default. If a debtor has more than one exposure, the highest risk class is assigned to all of his exposures.

Credit risk analysis

The table below provides information on maximum exposure to credit risk:

Credit risk exposure *In BGN thousand*	**App.**	**2020**	**2019**
Cash and cash equivalents (excluding cash at hand)	16	949,128	723,834
Financial assets at fair value through profit and loss (w/o equity instruments)	17	1	1
Loans and advances to banks	18	39,059	19,541
Financial assets at fair value through other comprehensive income (w/o equity instruments)	19.1	202,697	203,154
Financial assets at amortized cost	19.2	468,543	494,573
Loans and advances to clients	20	1,547,666	1,367,509
incl. Cash pool		*205,473*	*185,406*
Total balance sheet credit risk exposure		**3,207,094**	**2,808,612**
Off-balance sheet items			
Unutilized overdrafts and credit lines		117,909	123,986
Guarantees		46,387	40,556
Letter of credits		2,371	2,486
Total off-balance sheet credit risk exposure	34	**166,667**	**167,028**
Total credit risk exposure		**3,373,761**	**2,975,640**

The table below provides information on the distribution of loans in the loan portfolio of Allianz Bank Bulgaria AD by type of loan for each of the products offered by the Bank. Securities and promissory notes are not included in the collateral.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management, (continued)

Loan type	Consumer loans	Mortgage loans	Corporate loans and loans to SMEs	Financial Institutions	Total gross carrying amount
Unsecured Loans	279,120	2,388	80,237	162	361,907
Loans secured by:	39,886	519,353	471,214	31,804	1,062,257
Residential Properties	18	495,859	48,666	-	544,543
Commercial properties	-	22,215	203,893	2,830	228,938
Cash	1,994	23	7,726	-	9,743
Other collateral	37,874	1,256	210,929	28,974	279,033
Total loans at 31.12.2020	**319,006**	**521,741**	**551,451**	**31,966**	**1,424,164**

Credit risk analysis

Loan type	Consumer loans	Mortgage loans	Corporate loans and loans to SMEs	Financial Institutions	Total gross carrying amount
Unsecured Loans	258,752	26,787	80,555	426	366,520
Loans secured by:	23,321	426,724	399,650	30,414	880,109
Residential Properties	*28*	*426,453*	-	-	*426,481*
Commercial properties	-	-	*179,620*	*1,092*	*180,712*
Cash	*1,587*	*30*	*9,162*	-	*10,779*
Other collateral	*21,706*	*241*	*210,868*	*29,322*	*262,137*
Total loans at 31.12.2019	**282,073**	**453,511**	**480,205**	**30,840**	**1,246,629**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

The analysis of loans and advances to clients, banks and investment securities classified by risk is presented below:

In BGN thousand	**Loans and advances to clients**		**Loans and advances to banks**		**Investment securities (less equity instruments)**		**Off-balance sheet commitments**	
	2020	**2019**	**2020**	**2019**	**2020**	**2019**	**2020**	**2019**
Regular	1,482,615	1,289,311	39,060	19,558	671,864	698,231	46,961	41,046
Under supervision	85,158	73,524	-	-	-	-	2,387	2,431
Non-performing	61,864	69,200	-	-	-	-	124	300
Total	**1,629,637**	**1,432,035**	**39,060**	**19,558**	**671,864**	**698,231**	**49,472**	**43,777**
Impairment losses	(81,971)	(64,526)	(1)	(17)	(624)	(504)	(714)	(735)
Carrying amount	**1,547,666**	**1,367,509**	**39,059**	**19,541**	**671,240**	**697,727**	**48,758**	**43,042**
W/o arrears or impairment								
Regular	1,482,615	1,289,311	39,060	19,558	671,864	698,231	46,961	41,046
Under supervision	85,158	73,524	-	-	-	-	2,387	2,431
including restructured	*3,746*	*1,134*	-	-	-	-	-	-
	1,567,773	**1,362,835**	**39,060**	**19,558**	**671,864**	**698,231**	**49,348**	**43,477**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

	Loans and advances to clients		Loans and advances to banks		Investment securities (less equity instruments)		Off-balance sheet commitments	
	2020	**2019**	**2020**	**2019**	**2020**	**2019**	**2020**	**2019**
Individually impaired								
Non-performing	12,046	13,726	-	-	-	-	-	-
Loss	37,133	47,013	-	-	-	-	124	300
including restructured	*23,296*	*30,320*	-	-	-	-	-	-
	49,179	**60,739**	**-**	**-**	**-**	**-**	**124**	**300**
Overdue, but not impaired								
1≥ 30 days	8,896	4,212	-	-	-	-	-	-
> 30 days ≥ 60 days	1,172	1,035	-	-	-	-	-	-
> 60 days ≥ 90 days	349	753	-	-	-	-	-	-
> 90 days ≥ 180 days	541	1,182	-	-	-	-	-	-
> 180 days	1,727	1,279	-	-	-	-	-	-
including restructured	*4,662*	*4,773*	-	-	-	-	-	-
	12,685	**8,461**	**-**	**-**	**-**	**-**	**-**	**-**
Impairment losses								
Individually impaired	(45,690)	(48,167)	(1)	(17)	(624)	(504)	(650)	(279)
Collectively impaired	(36,281)	(16,359)	-	-	-		(64)	(456)
	(81,971)	**(64,526)**	**(1)**	**(17)**	**(624)**	**(504)**	**(714)**	**(735)**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

The analysis of loans and advances to clients for 2020, classified by Phases is presented below:

In BGN thousand	**Mortgage loans**	**Consumer loans**	**Credit cards individuals**	**Other loans**	**Working capital loans**	**Investment loans**	**Credit cards entities**	**Total**
Phase 1 (Regular)	460,215	195,718	9,054	60,826	514,274	242,356	172	1,482,615
Phase 2 (Unser supervision)	27,921	14,997	1,934	20,126	7,421	12,725	34	85,158
Phase 3 (Non-performing)	33,603	12,229	805	3,319	9,406	2,364	138	61,864
Total Gross value before impairment	**521,739**	**222,944**	**11,793**	**84,271**	**531,101**	**257,445**	**344**	**1,629,637**
Phase 1 (Regular)	5,122	2,550	87	421	9,069	10,700	3	27,952
Phase 2 (Unser supervision)	3,296	1,648	153	1,096	805	1,325	6	8,329
Phase 3 (Non-performing)	20,071	11,731	773	3,319	8,110	1,582	104	45,690
Impairment losses	**28,489**	**15,929**	**1,013**	**4,836**	**17,984**	**13,607**	**113**	**81,971**
Carrying amount	**493,250**	**207,015**	**10,780**	**79,435**	**513,117**	**243,838**	**231**	**1,547,666**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

W/o arrears or impairment	**494,508**	**210,866**	**10,997**	**80,952**	**522,708**	**255,339**	**240**	**1,575,610**
Phase 1 (Regular)	460,215	195,717	9,054	60,826	514,275	242,356	172	1,482,615
Phase 2 (Unser supervision)	27,921	14,997	1,934	20,126	7,421	12,725	34	85,158
Phase 3 (Non-performing)	6,372	152	9	-	1,012	258	34	7,837
including restructured	*3,749*	*277*	-	*75*	*419*	*2,179*	-	*6,699*
Individually impaired	**23,284**	**11,856**	**789**	**3,319**	**8,213**	**1,614**	**104**	**49,179**
Phase 3 (Non-performing)	23,284	11,856	789	3,319	8,213	1,614	104	49,179
including restructured	*16,733*	*1,625*	-	-	*3,783*	*1,139*	*16*	*23,296*
Overdue, but not impaired	**3,947**	**222**	**7**	-	**180**	**492**	-	**4,848**
1≥ 30 days	974	86	-	-	-	-	-	1,060
> 30 days ≥ 60 days	787	15	-	-	-	370	-	1,172
> 60 days ≥ 90 days	310	39	-	-	-	-	-	349
> 90 days ≥ 180 days	441	72	2	-	-	26	-	541
> 180 days	1,435	10	5	-	180	96	-	1,726
including restructured	*1,055*	-	-	-	*180*	*472*	-	*1,707*
	521,739	**222,944**	**11,793**	**84,271**	**531,101**	**257,445**	**344**	**1,629,637**
Impairment losses	**28,489**	**15,929**	**1,013**	**4,836**	**17,984**	**13,607**	**113**	**81,971**
Individually impaired	**20,071**	**11,731**	**773**	**3,319**	**8,110**	**1,582**	**104**	**45,690**
Collectively impaired	**8,418**	**4,198**	**240**	**1,517**	**9,874**	**12,025**	**9**	**36,281**
	493,250	**207,015**	**10,780**	**79,435**	**513,117**	**243,838**	**231**	**1,547,666**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

The analysis of loans and advances to clients for 2019, classified by Phases is presented below:

In BGN thousand	**Mortgage loans**	**Consumer loans**	**Credit cards individuals**	**Other loans**	**Working capital loans**	**Investment loans**	**Credit cards entities**	**Total**
Phase 1 (Regular)	392,720	181,734	8,059	51,751	458,493	196,287	267	1,289,311
Phase 2 (Unser supervision)	24,698	12,452	1,989	14,808	9,906	9,641	30	73,524
Phase 3 (Non-performing)	36,092	9,995	625	660	14,906	6,751	171	69,200
Total Gross value before impairment	**453,510**	**204,181**	**10,673**	**67,219**	**483,305**	**212,679**	**468**	**1,432,035**
Phase 1 (Regular)	2,643	2,424	71	267	3,686	2,634	17	11,742
Phase 2 (Unser supervision)	2,369	972	98	203	424	547	4	4,617
Phase 3 (Non-performing)	20,773	9,290	607	661	13,610	3,098	128	48,167
Impairment losses	**25,785**	**12,686**	**776**	**1,131**	**17,720**	**6,279**	**149**	**64,526**
Carrying amount	**427,725**	**191,495**	**9,897**	**66,088**	**465,585**	**206,400**	**319**	**1,367,509**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

	Mortgage loans	Consumer loans	Credit cards individuals	Other loans	Working capital loans	Investment loans	Credit cards entities	Total
W/o arrears or impairment	**424,711**	**194,326**	**10,065**	**66,559**	**469,354**	**206,366**	**340**	**1,371,721**
Phase 1 (Regular)	392,720	181,734	8,059	51,751	458,493	196,287	267	1,289,311
Phase 2 (Unser supervision)	24,698	12,452	1,989	14,808	9,906	9,641	30	73,524
Phase 3 (Non-performing)	7,293	140	17	-	955	438	43	8,886
including restructured	*4,616*	*14*	-	-	*243*	*438*	-	*5,311*
Individually impaired	**23,991**	**9,528**	**608**	**660**	**13,780**	**3,157**	**128**	**51,852**
Phase 3 (Non-performing)	23,991	9,528	608	660	13,780	3,157	128	51,852
including restructured	*16,761*	*1,428*	-	-	*5,870*	*2,064*	*20*	*26,143*
Overdue, but not impaired	**4,808**	**327**	-	-	**171**	**3,156**	-	**8,462**
1≥ 30 days	1,465	92	-	-	-	2,655	-	4,212
> 30 days ≥ 60 days	980	23	-	-	-	32	-	1,035
> 60 days ≥ 90 days	319	53	-	-	1	380	-	753
> 90 days ≥ 180 days	997	33	-	-	152	-	-	1,182
> 180 days	1,047	126	-	-	18	89	-	1,280
including restructured	*1,480*	*12*	-	-	*152*	*3,129*	-	*4,773*
	453,510	**204,181**	**10,673**	**67,219**	**483,305**	**212,679**	**468**	**1,432,035**
Impairment losses	**25,785**	**12,686**	**776**	**1,131**	**17,720**	**6,279**	**149**	**64,526**
Individually impaired	**20,773**	**9,290**	**607**	**661**	**13,610**	**3,098**	**128**	**48,167**
Collectively impaired	**5,012**	**3,396**	**169**	**470**	**4,110**	**3,181**	**21**	**16,359**
Carrying amount	**427,725**	**191,495**	**9,897**	**66,088**	**465,585**	**206,400**	**319**	**1,367,509**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

The analysis of loans and advances to clients for 2020 (Cash pool and Factoring receivables are not included in this analysis) in Phase 1 according to the Internal Rating Assessment is presented below:

Gross carrying amount

Rating	Other loans	Investment loans	Mortgage loans	Credit cards	Working capital loans	Consumer loans	Finance lease	Total
A+	-	-	-	-	1,973	-	-	**1,973**
A	-	-	-	-	568	-	-	**568**
BBB+	-	-	-	6	-	-	-	**6**
BBB	-	-	-	4	19,608	-	-	**19,612**
BBB-	-	-	12,941	245	9,829	1,305	30	**24,350**
BB+	-	1,504	22,312	2,222	432	3,443	1,180	**31,093**
BB	71	5,426	43,051	2,060	2,031	7,746	997	**61,382**
BB-	122	66,993	64,213	1,317	8,502	15,966	2,052	**159,165**
B+	194	81,977	219,006	2,501	50,439	102,482	24,181	**480,780**
B	332	63,943	81,354	508	75,020	40,630	26,198	**287,985**
B-	47	19,218	11,387	44	85,949	12,446	3,824	**132,915**
CCC+	-	996	4,442	90	17,771	8,488	78	**31,865**
CCC	-	2,300	1,200	24	5,498	2,984	41	**12,047**
CCC-	-	-	148	206	54	202	1,479	**2,089**
CC	-	-	160	-	586	25	-	**771**
Total	**766**	**242,357**	**460,214**	**9,227**	**278,260**	**195,717**	**60,060**	**1,246,601**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

Expected credit loss:

Rating	Other loans	Investment loans	Mortgage loans	Credit cards	Working capital loans	Consumer loans	Finance lease	Total
A+	-	-	-	-	-	-	-	-
A	-	-	-	-	-	-	-	-
BBB+	-	-	-	-	-	-	-	-
BBB	-	-	-	-	21	-	-	21
BBB-	-	-	21	-	17	2	-	40
BB+	-	3	43	13	3	6	7	75
BB	-	495	210	15	7	23	8	758
BB-	-	504	507	12	155	78	13	1,269
B+	1	5,537	1,816	26	462	746	66	8,654
B	2	2,402	1,726	16	1,634	774	237	6,791
B-	1	1,543	471	2	5,708	377	38	8,140
CCC+	-	47	183	1	608	354	1	1,194
CCC	-	168	128	1	315	175	1	788
CCC-	-	-	6	3	7	14	47	77
CC	-	-	11	-	95	2	-	**108**
Общо	**4**	**10,699**	**5,122**	**89**	**9,032**	**2,551**	**418**	**27,915**
Carrying amount	**762**	**231,658**	**455,092**	**9,138**	**269,228**	**193,166**	**59,642**	**1,218,686**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

The analysis of loans and advances to clients for 2019 (Cash pool and Factoring receivables are not included in this analysis) in Phase 1 according to the Internal Rating Assessment is presented below:

Rating	Other loans	Investment loans	Mortgage loans	Credit cards	Working capital loans	Consumer loans	Finance lease	Total
A+	-	-	-	-	1,986	-	-	**1,986**
A	-	-	-	-	618	-	-	**618**
BBB+	-	-	-	-	-	5	-	**5**
BBB	-	-	-	-	19,605	7	-	**19,612**
BBB-	290	-	16,281	242	29,425	2,526	-	**48,764**
BB+	2,914	1,787	25,658	2,506	743	6,728	11	**40,347**
BB	779	3,853	47,931	2,090	1,242	12,011	617	**68,523**
BB-	161	45,010	67,827	1,111	6,353	22,752	3,622	**146,836**
B+	8,191	64,410	136,624	1,795	68,883	54,699	14,831	**349,433**
B	5,686	62,463	77,811	466	53,532	49,820	13,224	**263,002**
B-	147	17,468	13,567	51	34,051	16,740	877	**82,901**
CCC+	-	1,030	5,100	28	11,602	11,803	109	**29,672**
CCC	-	266	1,396	25	1,512	4,215	92	**7,506**
CCC-	-	-	320	12	5,083	366	187	**5,968**
CC	14	-	204	-	159	62	-	**439**
Общо	**18,182**	**196,287**	**392,719**	**8,326**	**234,794**	**181,734**	**33,570**	**1,065,612**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

Expected credit loss:

Rating	Other loans	Investment loans	Mortgage loans	Credit cards	Working capital loans	Consumer loans	Finance lease	Total
A+	-	-	-	-	-	-	-	-
A	-	-	-	-	-	-	-	-
BBB+	-	-	-	-	-	-	-	-
BBB	-	-	-	-	21	-	-	21
BBB-	-	-	14	1	38	3	-	56
BB+	6	4	34	6	1	12	-	63
BB	3	13	103	9	4	33	-	165
BB-	-	238	234	21	33	99	13	638
B+	20	523	723	29	628	353	45	2,321
B	36	1,279	1,047	16	1,096	831	84	4,389
B-	2	530	260	1	991	420	7	2,211
CCC+	-	33	140	1	572	428	1	1,175
CCC	-	14	58	1	86	229	2	390
CCC-	-	-	16	1	192	11	4	224
CC	-	-	13	-	26	5	-	44
Total	**67**	**2,634**	**2,642**	**86**	**3,688**	**2,424**	**156**	**11,697**
Carrying amount	**18,115**	**193,653**	**390,077**	**8,240**	**231,106**	**179,310**	**33,414**	**1,053,915**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

Expected credit lose

IFRS 9 change the model of „incurred lose in IAS 39 with model of „Expected credit lose (ECL). It requires significant judgments haw the changed in the economic factors having an effect on ECL
The new impairment model applies to the following financial assets that are not valued under the ECL GCC:
- financial assets that are debt instruments;
- leasing receivables; and
- credit commitments and financial guarantee contracts (before impairment was determined in accordance with IAS 37 Provisions, Contingent Liabilities and Contingent Assets

Evaluation of ECL

The ECl is the probability-weighted credit loss estimate and will be determined as follows:

- financial assets that do not have credit impairment at the reporting date: the present value of the entire cash deficit - ie. the difference between the cash flows due under the contract and the cash flows that the Bank expects to receive
- financial assets that have credit impairment at the reporting date: the difference between the gross carrying amount and the present value of the expected future cash flows;
- undrawn credit commitments: the present value of the difference between the contractual cash flows payable to the Bank if the commitment is utilized and the cash flows that the Bank expects to receive;

The full description of the judgments and the manner of estimating the expected credit loss are described in paragraph 5 (e)

W/o arrears or impairment

Loans without arrears or impairment are serviced exposures that have no objective impairment indicators and for which the Bank allocates collective provisions for losses incurred but unrecorded at the exposure level. For the purpose of monitoring, the Bank groups the risk exposures on a portfolio basis in separate sub-portfolios on the basis of similar characteristics, according to their type, purpose and risk profile.

The Bank considers exposures subject to collective impairment for unrated exposures.

Individually impaired

Individually impaired loans are those for which the Bank considers that it will not be able to collect all principal and interest under the contractual terms of the transaction.

Overdue, but not impaired

Loans where the agreed principal and / or interest are overdue, but the Bank considers that it is not necessary to set aside uncollectible impairment on the basis of the collateral available or the collection stage of the amounts owed by the borrower.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

Restructured loans

Restructured loans are risk exposures whose original terms of the agreement have been altered by the Bank's concession to the debtor, caused by a deterioration in the latter’s financial condition, leading to the inability to repay the full amount of the debt, which concessions the Bank would not consider in other circumstances.

A concession means any of the following actions:

a) modification of the previous duration and contractual terms, which the borrower is not able to comply with due to his/her financial difficulties (“problematic debt") leading to an inability to service the debt, whereas such modifications would not have been made, had the debtor not experienced financial difficulties.

(b) Full or partial refinancing of a problematic debt contract that would not have been provided to a debtor if he had no financial difficulties.

The concession may lead to a loss for the Bank.

Exposures are not treated as exposures with renegotiated terms when the Bank has reason to believe that it will collect principal and interest and there are no circumstances showing a deterioration in the debtor's financial position.

The table below presents an analysis of gross and net (after deduction of impairment losses) carrying amounts of the individually impaired assets by risk groups:

	Loans and advances to clients		
In BGN thousand	**Gross**	**Net**	**% of impairment**
2020			
Non-performing	18,502	8,474	54%
Loss	43,362	7,687	82%
Total	**61,864**	**16,161**	**74%**
2019			
Non-performing	15,787	8,512	46%
Loss	53,413	12,481	77%
Total	**69,200**	**20,993**	**70%**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

The table below shows the amounts of derecognised loans and advances to customers:

In BGN thousand	**2020**	**2019**
Derecognized loans	7,206	41,219
Impairment losses	(7,206)	(41,219)
Value after impairment	**-**	**-**

The table below presents an analysis of restructured loans and advances to customers as of 31.12.2020 and 31.12.2019:

In BGN thousand	**2020**	**2019**
Restructured loans and advances to clients	**31,704**	**36,227**
Impairment losses	22,642	24,269
Carrying amount	9,062	11,958

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

	Provisions				Gross carrying amount			
Loans	**Phasee 1**	**Phase 2**	**Phase 3**	**Total**	**Phase 1**	**Phase 2**	**Phase 3**	**Total**
01 January 2020	**11,742**	**4,617**	**48,167**	**64,526**	**1,289,311**	**73,524**	**69,200**	**1,432,035**
Changes that affected the provisioning expense over the period	*16,236*	*3,712*	*(2,503)*	***17,445***	*193,333*	*11,634*	*(7,365)*	***197,602***
Changes due to migration from Phase 1 to Phase 2	(343)	343	-	-	(31,681)	31,681	-	-
Changes due to migration from Phase 1 and Phase 2 to Phase 3	(105)	(457)	562	-	(6,717)	(5,194)	11,911	-
Changes due to migration from Phase 2 and Phase 3 to Phase 1	1	(1)	-	-	135	(67)	(68)	-
Increases due to occurrence and acquisition	19,679	5,203	15,355	**40,237**	488,898	12,912	5,956	**507,766**
Decrease of the correction due to derecognition	-	-	(7,206)	**(7,206)**	-	-	(7,206)	**(7,206)**
Changes in accrued interest	-	-	-	-	-	-	-	-
Changes due to repayments	(3,022)	(1,376)	(11,188)	**(15,586)**	(257,331)	(27,698)	(17,929)	**(302,958)**
Movements with an impact on loan provision for the period 31.12.2020	**27,952**	**8,329**	**45,690**	**81,971**	**1,482,615**	**85,158**	**61,864**	**1,629,637**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

	Provisions				Gross carrying amount			
Loans	**Phase 1**	**Phase 2**	**Phase 3**	**Total**	**Phase 1**	**Phase 2**	**Phase 3**	**Total**
01 January 2019	11,296	4,702	88,049	**104,047**	**1,220,823**	**68,958**	**117,814**	**1,407,595**
Changes that affected the provisioning expense over the period	*446*	*(85)*	*(39,882)*	***(39,521)***	*68,488*	*4,566*	*(48,614)*	***24,440***
Changes due to migration from Phase 1 to Phase 2	(266)	266	-	-	(27,810)	27,810	-	-
Changes due to migration from Phase 1 and Phase 2 to Phase 3	(43)	(535)	578	-	(5,466)	(5,026)	10,492	-
Changes due to migration from Phase 2 and Phase 3 to Phase 1	2	(2)	-	-	21	(21)	-	-
Increases due to occurrence and acquisition	4,790	1,885	17,201	**23,876**	392,073	12,998	6,418	**411,489**
Decrease of the correction due to derecognition	-	-	(41,219)	**(41,219)**	-	-	(41,219)	**(41,219)**
Changes in accrued interest	-	-	-	-	-	-	-	-
Changes due to repayments	(4,037)	(1,699)	(16,442)	**(22,178)**	(290,330)	(31,195)	(24,305)	**(345,830)**
Movements with an impact on loan provision for the period 31.12.2019	**11,742**	**4,617**	**48,167**	**64,526**	**1,289,311**	**73,524**	**69,200**	**1,432,035**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

Guarantees	**Phase 1**	**Phase 2**	**Phase 3**	**Total provisions**	**Gross carrying amount**
Provisions for financial guarantees as at 01.01.2020	**410**	**45**	**280**	**735**	**43,777**
Changes that affected the provisioning expense for financial guarantees over the period	211	(17)	(215)	**(21)**	5,695
Transfer					
Changes due to migration from Phase 1 to Phase 2	-	-	-	**-**	-
Changes due to migration from Phase 1 and Phase 2 to Phase 3	-	-	-	**-**	-
Changes due to migration from Phase 2 and Phase 3 to Phase 1	-	-	-	**-**	-
Guarantees issued and change in ECL without phase change	379	5	39	**423**	26,569
Change from tax depreciation	-	-	-	**-**	-
Changes due to modification without derecognition	-	-	-	**-**	-
Changes due to updating the institution's valuation methodology	-	-	-	**-**	-
Decrease of the correction due to derecognition	-	-	-	**-**	-
Changes resulting from cancellation of bank guarantees or change in ECL without phase change	(168)	(22)	(254)	**(444)**	(20,874)
Total cost of provisions on financial guarantees	**211**	**(17)**	**(215)**	**(21)**	**5,695**
Provisions for financial guarantees as at 31.12.2020	**621**	**28**	**65**	**714**	**49,472**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

Guarantees	Phase 1	Phase 2	Phase 3	Total provisions	Gross carrying amount
Provisions for financial guarantees as at 01.01.2019	**370**	**114**	**324**	**808**	**45,085**
Changes that affected the provisioning expense for financial guarantees over the period	40	(69)	(44)	**(73)**	(1,308)
Transfer					
Changes due to migration from Phase 1 to Phase 2	(6)	6	-	**-**	-
Changes due to migration from Phase 1 and Phase 2 to Phase 3	-	-	-	**-**	-
Changes due to migration from Phase 2 and Phase 3 to Phase 1	-	-	-	**-**	-
Guarantees issued and change in ECL without phase change	177	8	6	**191**	18,698
Change from tax depreciation	-	-	-	**-**	-
Changes due to modification without derecognition	-	-	-	**-**	-
Changes due to updating the institution's valuation methodology	-	-	-	**-**	-
Decrease of the correction due to derecognition	-	-	-	**-**	-
Changes resulting from cancellation of bank guarantees or change in ECL without phase change	(131)	(83)	(50)	**(264)**	(20,006)
Total cost of provisions on financial guarantees	**40**	**(69)**	**(44)**	**(73)**	**(1,308)**
Provisions for financial guarantees as at 31.12.2019	**410**	**45**	**280**	**735**	**43,777**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

	Provisions				Loan Commitments			
	Phase 1	**Phase 2**	**Phase 3**	**Total**	**Phase 1**	**Phase 2**	**Phase 3**	**Total**
1.01.2020	**1,659**	**67**	**581**	**2,307**	**121,546**	**4,102**	**645**	**126,293**
Changes that affected the provisioning expense over the period	(337)	161	36	**(140)**	(11,403)	5,137	49	**(6,217)**
Changes due to migration from Phase 1 to Phase 2	(7)	7	-	-	(1,241)	1,241	-	-
Changes due to migration from Phase 1 and Phase 2 to Phase 3	(1)	(1)	2	-	(168)	(63)	231	-
Changes due to migration from Phase 2 and Phase 3 to Phase 1	-	-	-	-	16	(16)	-	-
Increases due to occurrence and acquisition	849	181	218	**1,248**	51,904	5,583	163	**57,650**
Changes due to modification without derecognition	-	-	-	-	-	-	-	-
Changes due to updating the institution's valuation methodology	-	-	-	-	-	-	-	-
Decrease of the correction due to derecognition	-	-	-	-	-	-	-	-
Changes in accrued interest	-	-	-	-	-	-	-	-
Changes due to repayments	(1,178)	(26)	(184)	**(1,388)**	(61,914)	(1,608)	(345)	**(63,867)**
Movements with an impact on provision for the period 31.12.2020	**1,322**	**228**	**617**	**2,167**	**110,143**	**9,239**	**694**	**120,076**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

	Provisions				Loan Commitments			
	Total	**Phase 1**	**Total**	**Phase 1**	**Total**	**Phase 1**	**Total**	**Phase 1**
1.01.2019	**1,696**	**81**	**550**	**2,327**	**105,907**	**4,569**	**634**	**111,110**
Changes that affected the provisioning expense over the period	(37)	(14)	31	**(20)**	15,639	(467)	11	**15,183**
Changes due to migration from Phase 1 to Phase 2	(18)	18	-	-	(2,341)	2,341	-	-
Changes due to migration from Phase 1 and Phase 2 to Phase 3	(2)	(2)	4	-	(210)	(116)	326	-
Changes due to migration from Phase 2 and Phase 3 to Phase 1	3	(3)	-	-	115	(115)	-	-
Increases due to occurrence and acquisition	627	28	277	**932**	47,390	883	194	**48,467**
Changes due to modification without derecognition	-	-	-	-	-	-	-	-
Changes due to updating the institution's valuation methodology	-	-	-	-	-	-	-	-
Decrease of the correction due to derecognition	-	-	-	-	-	-	-	-
Changes in accrued interest								
Changes due to repayments	(647)	(55)	(250)	**(952)**	(29,315)	(3,460)	(509)	**(33,284)**
Movements with an impact on provision for the period 31.12.2019	**1,659**	**67**	**581**	**2,307**	**121,546**	**4,102**	**645**	**126,293**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

The table below presents the concentration of credit risk by economic sectors.

In BGN thousand	**2020**	**2019**
Concentration by sector		
State government	26,083	45,693
Administrative and auxiliary activities	13,710	16,982
Operations with Real Estate	38,585	43,563
Manufacturing	86,953	41,952
Production and distribution of electricity and heat energy	49,764	56,998
Professional activities and research	3,355	3,021
Agriculture, forestry and fishery	48,460	47,658
Construction	24,998	22,540
Creation and dissemination of information and creative products; telecommunications	2,116	2,195
Transport, storage and mail	14,972	21,113
Trade, repair of motor vehicles and motorcycles	175,392	116,548
Financial and insurance services	240,020	218,909
Hospitality and restaurant business	59,837	53,750
Other	4,645	5,530
	788,890	**696,452**
Loans to the population		
Mortgage	521,739	453,510
Consumer	319,008	282,073
	840,747	**735,583**
Impairment losses	(81,971)	(64,526)
	1,547,666	**1,367,509**

Collateral and other credit facilities

The Bank's policy includes consideration of the need to provide collateral before granting approved loans. The degree of collateral of each specific risk exposure is established against the amount of collateral accepted by the Bank for the application of specific security margins.

Collaterals on loans, guarantees and letters of credit, excluding credit cards, include cash, property, plant and equipment, exchange-traded government securities, or other property, a pledge of receivables, a pledge of a commercial enterprise, and others.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

Collateral and other credit facilities, (continued)

The Bank holds collateral and other credit facilities against certain credit exposures. The table below lists the major types of collateral held against different types of financial assets.

		Percentage of the exposure subject to an agreement requiring collateral	
Credit exposure type	**Main type of collateral**	**2020**	**2019**
Loans and advances to banks			
Sale and redemption agreements	Tradeable securities	100	100
Loans and advances to individuals			
Home loans	Residential Properties	100	100
Consumer lending	Guarantee, pledge of receivables originating from salary and other remuneration	100	100
Credit cards	None	-	-
Loans and advances to corporate clients			
Other lending to corporate clients	Commercial property, Commercial property rights	100	100

The Bank requires valuers to measure net realizable value, which is the sale price of the asset on a liquid market, less the additional costs directly associated with the realization (sale) of the asset

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

Collateral and other credit facilities continued

The Bank requires valuers to measure net realizable value, which is the sale price of the asset on a liquid market, less the additional costs directly associated with the realization (sale) of the asset.

The table below shows the total amount before deduction of impairment of loans and advances to customers provided by the Bank:

In BGN thousand	**2020 г.**	**2019 г.**
Cash	**9,743**	**10,779**
Regular	8,154	9,075
Under supervision	566	701
Non-performing	437	758
Loss	586	245
Mortgage on Real Estate	**773,481**	**607,193**
Regular	689,867	554,445
Under supervision	42,877	33,425
Non-performing	10,694	7,417
Loss	30,043	11,906
Other collateral	**279,033**	**262,137**
Regular	263,944	250,514
Under supervision	9,335	10,956
Non-performing	1,314	337
Loss	4,440	330
Secured loans	**1,062,257**	**880,109**
Unsecured loans	**361,907**	**366,520**
Total loans and advances to clients	**1,424,164**	**1,246,629**

Other collateral includes pledges on current assets - inventories, receivables from third parties as well as bets on commercial enterprises.

Mortgage lending (individuals and corporate clients)

The tables below provide credit exposures from mortgage loans and advances to customers - corporate clients and corporate clients - depending on the value of the loan-to-value (LTV) ratio. LTV is calculated as the ratio of the gross loan amount (or the corresponding amount of credit commitment) to the value of the collateral. Gross value does not include accrued impairment. The valuation of the collateral includes future costs for the acquisition and realization of the collateral. The value of mortgage collateral is based on the latest valuation made by an independent expert assessor.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

Mortgage lending (individuals and corporate clients,(continued)

In BGN thousand	**2020**	**2019**
Loan to value (LTV) ratio		
Less than 50%	283,414	128,028
51% to 70%	219,273	156,492
71% to 90%	200,451	149,343
91% to 100%	12,234	10,291
More than 100%	20,364	9,357
Total	**735,736**	**453,511**

As at 31 December 2020, the book value of the assets acquired from collaterals - real estate amounts to BGN 331 thousand. (as at 31.12.2019) BGN 331 thousand)

Financial assets at fair value through profit and loss

Below is an analysis of the credit quality of financial assets measured at fair value through profit or loss based on ratings of Standard & Poor's rating agency:

In BGN thousand	**2020**	**2019**
Corporate bondss		
Without rating	2	3
Compensatory instruments		
Without rating	1	1
	3	**4**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

The tables below set out the financial assets of the Bank by country of registration of the issuer at 31 December 2020 and 31 December 2019 (less capital instruments).

2020

In BGN thousand	**Bulgaria**	**Nederland**	**Spain**	**Macedonia**	**Poland**	**Portugal**	**Romania**	**Hungary**	**Croatia**	**Czech Republic**	**USA**	**Total**
Financial assets at fair value through profit and loss												
Compensatory instruments	1	-	-	-	-	-	-	-	-	-	-	1
	1	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**1**
Financial assets at fair value through other comprehensive income												
Government securities	53,778	-	31,910	-	-	4,069	57,763	-	5,286	-	9,556	162,362
Corporate bonds	4,081	8,942	-	-	24,702	-	-	2,610	-	-	-	40,335
	57,859	**8,942**	**31,910**	**-**	**24,702**	**4,069**	**57,763**	**2,610**	**5,286**	**-**	**9,556**	**202,697**
Financial assets measured at amortized cost												
Government securities	365,716	-	9,839	8,663	9,536	-	11,206	-	14,648	17,238	-	436,846
Corporate bonds	15,883	-	-	-	13,817	-	-	1,997	-	-	-	31,697
	381,599	**-**	**9,839**	**8,663**	**23,353**	**-**	**11,206**	**1,997**	**14,648**	**17,238**	**-**	**468,543**
Total	**439,459**	**8,942**	**41,749**	**8,663**	**48,055**	**4,069**	**68,969**	**4,607**	**19,934**	**17,238**	**9,556**	**671,241**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit Risk analysis, (continued)

2019

In BGN thousand	Bulgaria	Nederland	Spain	Macedonia	Poland	Portugal	Romania	Hungary	France	Croatia	Czech Republic	Sweden	Australia	Total
Financial assets at fair value through profit and loss														
Compensatory instruments	1	-	-	-	-	-	-	-	-	-	-	-	-	1
	1	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**1**
Financial assets at fair value through other comprehensive income														
Government securities	52,099	-	36,006	-	-	4,242	37,900	2,690	-	5,458	-	-	-	138,395
Corporate bonds	4,273	8,892	-	-	24,973	-	-	2,667	7,927	6,198	-	7,830	1,999	64,759
	56,372	**8,892**	**36,006**	**-**	**24,973**	**4,242**	**37,900**	**5,357**	**7,927**	**11,656**	**-**	**7,830**	**1,999**	**203,154**
Financial assets measured at amortized cost														
Government securities	357,870	-	17,983	8,868	9,609	-	30,542	-	-	15,039	17,881	-	-	457,792
Corporate bonds	15,815	-	-	-	13,934	-	-	2,041	-	-	-	-	4,991	36,781
	373,685	**-**	**17,983**	**8,868**	**23,543**	**-**	**30,542**	**2,041**	**-**	**15,039**	**17,881**	**-**	**4,991**	**494,573**
Total	**430,058**	**8,892**	**53,989**	**8,868**	**48,516**	**4,242**	**68,442**	**7,398**	**7,927**	**26,695**	**17,881**	**7,830**	**6,990**	**697,728**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic

During the reporting year, the Bank's activities were affected by the global COVID-19 pandemic. In response to the global pandemic crisis COVID-19, the Parliament of the Republic of Bulgaria announced a resolution for declaring a state of emergency on the territory of Bulgaria effective from 13 March 2020. The restrictions introduced by the Measures and Actions during a State of Emergency Act, announced by resolution of the National Assembly on 13 March 2020 and their consequences limited the business activities in Bulgaria and had a negative impact and would continue to have such negative impact on the business, the market participants, the Bank's clients, and the national and global economy for a certain period. The extraordinary measures were applied in 2020 and continue in March 2021.

The Bank has taken the required measures to guarantee the sustainability of the bank operations and to support its clients and employees, as follows:

- Establishment of adequate control measures concerning the spread of the infection at the workplace, which include a system of measures to reduce the transmission of the infection and employees' training;
- Triggering action plans for states of emergency, which include scenarios for pandemic and which provide measures for the specific phases of the pandemic development;
- Evaluating how quickly can be applied the measures designated in the pandemic scenario under states of emergency and how long can be maintained the Bank's operations under such scenario;
- Remote work and other flexible working conditions for the employees to ensure business continuity
- Evaluation and testing of the capacity of the existing IT infrastructure also in the light of the potential increase of the cyber attacks and the potentially higher dependence on the remote banking services
- Evaluation of the increased fraud risks connected with cybersecurity directed both to the clients and to the Bank by phishing emails, etc.;
- Starting discussions with service providers to ensure the succession of services in case of consequences from the pandemic;
- Moratorium on the loan repayment by clients affected by the crisis as an effective instrument in case of short-term liquidity difficulties of the banks' clients.

In connection with the COVID-19 pandemic and pursuance of the Guidelines of the European Banking Authority (EBA), the decisions of the Bulgarian National Bank and the Association of the Banks in Bulgaria (ABB) concerning the legislative and the non-legislative moratoria on loan repayments applied with a view to the crisis caused by COVID-19, Allianz Bank Bulgaria AD made a decision to join the approved terms and conditions for a non-legislative moratorium on repayments and developed an operational plan to assist in a balanced manner for the protection of its clients' interests and has continued providing high-quality bank services.

The Bank proposed mechanisms to its clients to relieve the servicing of the performing exposures of its clients - borrowers, affected by the measures related to the COVID-19 pandemic, following the decisions of the European Banking Authority (EBA), the Bulgarian National Bank, and the Association of the Banks in Bulgaria (ABB).

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

On 3 April 2020, the Governing Council of the Bulgarian National Bank decided to comply with the European Banking Authority (EBA) Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis (EBA/GL/2020/02) Based on the EBA Guidelines, BNB requested that within 5 business days the commercial banks propose for approval uniform draft rules for a non-legislative moratorium on the repayments of bank loans related to COVID-19 situation.

On 10 April 2020, the Governing Council of the Bulgarian National Bank approved the Association of the Banks in Bulgaria's (ABB) draft Procedure for deferment and settlement of the collectible debts to banks and their subsidiaries - financial institutions in connection with the state of emergency introduced by the National Assembly on 13 March 2020, which represents a non-legislative moratorium in the meaning of European Banking Authority (EBA) Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis (EBA/GL/2020/02).

Allianz Bank Bulgaria AD joined the decision of the Association of the Banks in Bulgaria for applying the approved procedure for deferment of collectible debts. The approved non-legislative moratorium has allowed changes in the schedule for repayment of the principal and/ or the debt-related interests without changing the key parameters of the loan contract, for example, the agreed interests.

Based on the approved procedure, the Bank provides the following relieves to its clients:
- Mechanism No. 1 - deferment of the principal and the interest for up to 6 months, which shall expire latest on 31 December 2020;
- Mechanism No. 2 - deferment of the principal for up to 6 months, which shall expire latest on 31 December 2020;
- Mechanism No. 3 applicable for revolving facilities.

The EBA Guidelines introduce a temporary principle that the moratoria on bank loan repayments do not result in reclassifying exposures in the form of restructuring or default provided that the measures are based on national law and are agreed and applied on the bank sector level.

On 9 July 2020, the Governing Council of the Bulgarian National Bank decided to comply with the European Banking Authority (EBA) Guidelines - EBA/GL/2020/08 amending Guidelines EBA/GL/2020/02 on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis, which extend with three months - from 30 June 2020 to 30 September 2020, the deadline for applying the moratoria on repayments, laid down in Guidelines EBA/GL/2020/02. The extension of the term refers to a change in section 4, item 10, letter "f" of the EBA Guidelines - EBA/GL/2020/02.

Concerning the above and on the grounds of art. 16, item 20 of the Bulgarian National Bank Act and art. 79a, para. 3 of the Credit Institutions Act, BNB approved the proposed by the Association of the Banks in Bulgaria extension of the terms in the adopted Procedure for deferment and settlement of collectible debts to banks and their subsidiaries - financial institutions in connection with the state of emergency related to the COVID-19 pandemic, introduced on 13.03.2020 by the National Assembly.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

The amendments refer to:

- extension of the deadline for submission of requests by clients of the banks for deferment of debts and their approval by the banks - until 30 September 2020.
- Extension of the deadline for deferment of clients' debts to banks - until 31 March 2021.
- Extension of the term of validity of the procedure for deferment of debts refers to exposures for which request for deferment of repayments was not submitted before 22 June 2020.

On 11 December 2020, the Governing Council of the Bulgarian National Bank (BNB) on the grounds of art. 16, item 20 of the BNB Act and art. 79a, para. 3 of the Credit Institutions Act approved the proposed by the Association of the Banks in Bulgaria extension of the deadline until 31 March 2021 of the approved „Procedure for deferment and settlement of collectible debts to banks and their subsidiaries - financial institutions related to the state of emergency announced by the National Assembly on 13 March 2020", which represents a non-legislative moratorium in the meaning of the European Banking Authority (EBA) Guidelines - EBA/GL/2020/15 amending Guidelines EBA/GL/2020/02 on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis.

Concerning the COVID-19 pandemic, Allianz Bank Bulgaria AD on the grounds of a letter of the Bulgarian National Bank, ref. № БНБ-34578/03.04.2020 and in pursuance of the European Banking Authority Guidelines of 2 April 2020 – Guidelines on legislative and non-legislative moratoria on loan repayments applied in light of the COVID-19 crisis (EBA/GL/2020/02), amended by EBA Guidelines (EBA/GL/2020/08 of 25 June 2020) amending Guidelines EBA/GL/2020/02 and by EBAGuidelines (EBA/GL/2020/15 of 2 December 2020) amending Guidelines EBA/GL/2020/02, proposed to its clients the following options for deferment and settlement of debts:

- deadline for submission of requests by clients of the banks for deferment of debts - until 23 March 2021;
- Deadline for approval of these requests on the part of the banks - until 31 March 2021;
- deadline for deferment of debts of the banks' clients - until 31 December 2021, however for up to 9 months;
- Introduction of the requirement that the debts subject to moratorium have been performing or not more than 90 days past due on the date of submission of the request for deferment;
- Introduction of the option that the debts for which request for deferment was submitted before 30 September 2020 may be additionally deferred provided that the total period of all deferments shall not exceed 9 months.

The table below provides information about the distribution of the loans with the provided measures under the moratorium in the loan portfolio of Allianz Bank Bulgaria AD by Phases in the meaning of IFRS 9 for each product offered by the Bank.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

Loan type	Morgage loans Moratorium	Consumer loans Moratorium	Other loans	Working capital loans Moratorium	Investment loans Moratorium	Total
COVID-19 Phase 1 (Performing)	24,442	4,504	1,250	22,961	63,283	116,440
COVID-19 Phase 2 (Monitored)	5,418	1,554	4,040	2,460	5,370	18,842
COVID-19 Phase 3 (Non-performing)	6,321	1,125	1,980	-	363	9,789
Total Gross value before impairment COVID-19	**36,181**	**7,183**	**7,270**	**25,421**	**69,016**	**145,071**
COVID-19 Phase 1 (Performing) impairment	(191)	(69)	(5)	(750)	(741)	(1,756)
COVID-19 Phase 2 (Monitored) impairment	(572)	(160)	(69)	(160)	(358)	(1,319)
COVID-19 Phase 3 (Non-performing) impairment	(3,969)	(1,103)	(1,980)	-	(363)	(7,415)
COVID-19 Impairment	**(4,732)**	**(1,332)**	**(2,054)**	**(910)**	**(1,462)**	**(10,490)**
COVID-19 Phase 1 (Performing) Management overlay	(2,107)	(316)	(82)	(2,944)	(7,519)	(12,968)
COVID-19 Phase 2 (Monitored) Management overlay	(390)	(519)	(519)	(368)	(629)	(2,425)
COVID-19 Phase 3 (Non-performing) Management overlay	-	-	-	-	-	-
COVID-19 Impairment Management overlay	**(2,497)**	**(835)**	**(601)**	**(3,312)**	**(8,148)**	**(15,393)**
COVID-19 Phase 1 total impairment losses	(2,298)	(385)	(87)	(3,694)	(8,260)	(14,724)
COVID-19 Phase 2 total impairment losses	(962)	(679)	(588)	(528)	(987)	(3,744)
COVID-19 Phase 3 total impairment losses	(3,969)	(1,103)	(1,980)	-	(363)	(7,415)
COVID-19 total impairment losses	**(7,229)**	**(2,167)**	**(2,655)**	**(4,222)**	**(9,610)**	**(25,883)**
Book value as of 31.12.2020	**28,952**	**5,016**	**4,615**	**21,199**	**59,406**	**119,188**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

The loan distribution by a residual term of the moratorium measures is given in the table below:

BGN'000	**2020**		
	Of which: With expired term	**Residual term for the moratoria <= 3 months**	**Total**
COVID-19 Phase 1 (Performing)	115,621	819	116,440
COVID-19 Phase 2 (Monitored)	18,671	171	18,842
COVID-19 Phase 3 (Non-performing)	9,768	21	9,789
Total gross value before impairment COVID19	**144,060**	**1,011**	**145,071**
COVID-19 Phase 1 (Performing) impairment	14,657	67	14,724
COVID-19 Phase 2 (Monitored) Impairment	3,709	35	3,744
COVID-19 Phase 3 (Non-performing) impairment	7,394	21	7,415
COVID-19 Impairment losses	**25,760**	**123**	**25,883**
Book value COVID-19	**118,300**	**888**	**119,188**

Operational plan for implementation of the measures for deferment and settlement of debts

The Management Board and the Supervisory Board of the Bank shall carry out adequate supervision on the critical elements of the credit risk management, including the following:

- Review of the risk assumption standards, risk appetite framework, and strategy under realistic macroeconomic scenarios;
- Adequate monitoring and analysis of all changes in the prudential and accounting frameworks;
- Appropriate delegation of competencies and authorities to experts and working groups in the bank for overcoming the impact of the COVID-19 crisis.

Ensuring disciplined and effective separation of the obligations under the processes of granting loans, monitoring, restructuring, and collection of loans with approved adequate organizational structure, which is to guarantee that no mixing will occur of activities allocated to the different functions and roles in the first and the second line of protection for the achievement of quick response to the COVID-19 pandemic.

The Risk Management Division includes the following directorates:

- Risk Control and Reporting Directorate with Credit Risk, Monitoring and Provisioning Department, which authorities include the monitoring of the credit exposures and the Bank's portfolio;
- Credit Risk Directorate with competencies to approve new transactions;
- Problem Loans Directorate with Renegotiation and Restructuring Department with competencies to make decisions about renegotiating and restructuring of the Bank's credit exposures.

The measure(s) provided by the Bank according to the approved mechanisms for deferment and settlement of the debts of obligors, subject to a moratorium on repayments, do not result automatically to the reclassification of exposures as exposures with restructuring measures, and the classification is reviewed for each case in compliance with art. 47 b of Regulation (EU) No. 575/2013.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

For the purpose of article 178, paragraph 1, letter b) of Regulation (EU) No. 575/2013 and in compliance with article 178, paragraph 2, letter (e) of the same Regulation, the Bank reports the days past due based on the amended repayment schedule ensuing from the application of the moratorium. In the same manner for the purpose of article 47A, paragraph 3, letter c) of Regulation (EU) No. 575/2013, the Bank reports the days past due based on the amended repayment schedule based on the application of the moratorium.

During the term of the moratorium, the Bank shall assess the potential probability of default of obligors, covered by the moratorium, in compliance with the policies and the practices, which it applies for such assessment, including when they are based on automatic checks of the indications of unlikeliness to pay.

When individual evaluations are made of individual obligors, the bank gives priority to evaluating the obligors for which the consequences from the COVID-19 pandemic most probably will result in long-term financial difficulties or insolvency. The Bank shall carry out an assessment of the unlikeliness to pay based on the most recent repayment schedule resulting from the application of the overall moratorium on payments.

Upon evaluating the unlikeliness to pay, the Bank shall take into account also any provided additional measures for support, which may have an impact on the creditworthiness of the obligor:

- consumer loans to natural persons under Programme with the Bulgarian Bank for Development for guaranteeing interest-free loans in support of people deprived of the opportunity to work due to the COVID-19 pandemic and
- granting/ renegotiation of loans under the Programme for portfolio guarantees in support of the liquidity of micro-, small-sized, and medium-sized enterprises (SME) adversely affected by the state of emergency and the COVID-19 pandemic of the Bulgarian Development Bank AD.

Any form of mitigation of the loan risk including guarantees from the Bulgarian Development Bank AD will not influence the results from the evaluation of the potential unlikeliness to pay on the part of clients - borrowers who have benefited from the moratorium, after its expiration. When the borrower has other exposures to the Bank, which are not subject to moratorium, the Bank shall take into account the impact and the results from these exposures upon evaluation of the borrower’s ability to comply with the terms of repayment after expiration of the moratorium.

The Bank shall assess the potential unlikeliness to pay on the part of clients - borrowers who have benefited from the moratorium and their related parties, after its expiration, in the following cases:

- Before granting new loans to obligors who have benefited from the moratorium based on individual assessment;
- Before renegotiating/ restructuring the existing debts of obligors who have benefited from the moratorium, subject of the moratorium on repayments based on individual assessment;
- Every month based on systematic check during the period of the moratorium;
- At least once a year after submission of the financial statements during the annual review of the obligor and its related parties based on individual evaluation;
- Upon expiration of the measure under the moratorium based on system and individual evaluation.

The bank must carry out an individual evaluation of the unlikeliness to pay concerning the individual obligors after the end of the moratorium in the following cases:

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

- When debtors delay the payment for more than 30 days within 12 months after the end of the moratorium;
- When for a debtor for whom deferment is applied under the moratorium, restructuring measures are applied after the end of the moratorium;

Except in the above cases, the extraordinary individual evaluation shall be carried out after the end of the moratorium also in the following cases:
- The client's exposure exceeds BGN 500,000;
- The exposure is in the monitoring list;
- The client's rating leads to classification in Phase 3 in the meaning of IFRS9.

Indications of unlikeliness to pay

The Bank recognizes exposures as such with unlikeliness to pay and identifies indications of unlikeliness to pay according to section 5 of EBA Guidelines on the application of the definition of default. Upon evaluation of the unlikeliness to pay, in compliance with Annex V to Commission Implementing Regulation (EU) No 680/2014, the Bank shall consider at least the following refutable circumstances:
- More than 30 days past due during the moratorium or up to12 months thereafter;
- The internal obligor's rating shows default of debts;
- Application of restructuring measures within 12 months after the expiration of the moratorium;
- More than 90 days past due under any credit exposure of the obligor or its related parties;
- Availability of other non-performing exposure of the obligor and/ or its related person with restructuring measures according to Regulation (EU) No. 680/2014;
- The obligor has other exposure classified as impaired;
- The obligor is subject to liquidation/ insolvency proceedings.

Measuring the estimated credit loss (ECL)

Changes caused by the COVID-19 crisis require that the Bank provides an adequate assessment of its exposures and measuring the estimated credit loss (ECL). The future effects of the existing economic situation and the measures taken are difficult to foresee and the current expectations and evaluations of the management may differ from the actual results.

To measure the estimated credit losses (ECL), the Bank applies factors as Forward-looking information (FLI) including forecasts for economic variables. As for any economic forecast, the forecasts and the probability of occurrence are subject to a high degree of inherent insecurity and therefore the actual results may be considerably different than the estimates.

Macroeconomic forecasts for the purpose of IFRS 9

The Bank bases its forecasts on the regularly published macroeconomic forecasts of the European Central Bank (ECB) and the Bulgarian National Bank (BNB) without applying the use of only long-term average values. In this way is achieved the correct balance between avoiding excessive procyclicality and concurrently the risks, which it faces are adequately entered in the reports and the models.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

The most important macroeconomic variables evaluated in connection with the forward-looking information (FLI) as of 31 December 2020 are the following:

Macroeconomic variable	Basic scenario	Pessimistic scenario	Optimistic scenario
Annual GDP growth	3.3	0.6	5.1
Annual unemployment growth	5.6	8.6	5.2
Harmonized consumer prices index	1.8	0.0	2.4

The Bank has adopted a conservative approach and its input risk parameters and models comply with the monitored considerable increase of the economic environment. The results of the models show higher levels of probability of default (PD) compared to those, which underlie the currently monitored migrations as a result of the COVID-19 pandemic.

Despite the COVID-19 related measures, concerning the annual risk review and updating, the parameters and the models of the Bank has undertaken the following actions:

- The Bank has updated the documentation in connection with the rating models, which apply for calculation of the probability of default (PD) and it has explicitly defined targets for each variable by which is monitored the strength of the model.
- As of 31.12.2020, the Bank has carried out the required changes of the models to guarantee the efficiency of the models by an expansion of the test set and through updating the most recent data, and for this purpose, training sets have been used (for 5 years from 28/11/2014 until 29/11/2019), by studying the behaviour of the Bank’s obligors until 29/11/2020. All changes have been made and integrated into the Bank’s systems. The results of the new models are documented in the methodology for PD.
- Internal methodology has been developed based on monitoring of the portfolio of Allianz Bank Bulgaria AD. Based on this methodology the current values of Lifetime PD have been calculated.
- As of 31.12.2020, the Bank has updated its models for calculation of the risk parameters: Forward-looking information (FLI), loss given default (LGD_ and credit conversion factor (CCF). In connection with the evaluation of the model adequacy, the analysis was performed of the series of data, including stationariness, autocorrelation, error, stability, forecasting accuracy tests. The changes of the model are documented.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

The pessimistic scenarios are included with the highest weight in the models of calculation of the forward-looking information (FLI) for the probability of default (PD), loss given default (LGD), and the credit conversion factor (CCF). The balanced distribution of the alternative scenarios around the basic scenario laid down in the forecasts of the ECB is achieved through the established models.

Weighing the scenarios for calculating information oriented to the future (FLI):

	Optimistic scenario	Basic scenario	Pessimistic scenario
2019	25%	50%	25%
2020	24%	26%	50%

Weighing the scenarios for calculating the loss given default (LGD):

	Optimistic scenario	Basic scenario	Pessimistic scenario
2019	27%	27%	45%
2020	24%	26%	50%

Weighing the scenarios for calculating the credit conversion factor (CCF):

	Optimistic scenario	Basic scenario	Pessimistic scenario
2019	-	-	-
2020	11%	17%	72%

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

Evaluation of considerable increase of the credit risk

The Bank evaluates adequately all risk parameters to reflect correctly the increased credit risk for the risk-weighted assets as well as for calculation of impairment provisions. For that purpose, the Bank considers the COVID-19 effects and the related mitigating measures (such as government guarantees and moratoria) in the process of determination of the ratings of each client and quantitative determination of the risk parameter in compliance with the regulatory requirements and the approved models and processes and compliance with the requirements of Regulation (EU) 529/2014.

Any change of each component of the variable of the PD model presumes evaluation of the materiality of the model change and approval of the relevant competent authorities of the Bank. Concerning the significant impairment of the business environment, the establishment of moratoria for payment does not result in improvements in the value of the risk indicators compared to the values observed before COVID-19.

For moratoria, which do not meet the EBA requirements, the restructuring measure is a factor, which takes part in the model and results in awarding the most negative rating grade D (PD 100%) for classification in Phase 3 or to rating impairment and application of lifetime PD as a result of the classification in Phase 2.

The moratoria on repayments related to COVID-19, which allows, requires, or promotes suspension or delay of repayments is not considered an automatic trigger to initiate evaluations for significant increase in credit risk (SICR). Significant increase in credit risk is established as early as possible, practically yet upon the establishment of the measure under the moratorium despite the evaluation of the rating system.

The table below provides information about the origin of the movement between the Phases in the meaning of IFRS 9 for loans with established measures under the moratorium in the credit portfolio of Allianz Bank Bulgaria AD.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

Evaluation of considerable increase of the credit risk

BGN'000

	Provisions				**Gross book value**			
Loans	**Phase 1**	**Phase 2**	**Phase 3**	**Total**	**Phase 1**	**Phase 2**	**Phase 3**	**Total**
01.01.2020	**1,919**	**681**	**3,777**	**6,377**	**131,421**	**8,879**	**6,042**	**146,342**
Changes affecting the costs for provisions during the period	12,805	3,063	3,638	**19,506**	(14,981)	9,963	3,747	**(1,271)**
Changes due to migration from Phase 1 to Phase 2	(135)	135	-	**-**	(11,464)	11,464	-	**-**
Changes due to migration from Phase 1 and Phase 2 to Phase 3	(20)	(96)	116	**-**	(2,585)	(1,304)	3,889	**-**
Changes due to migration from Phase 2 and Phase 3 to Phase 1	1	(1)	-	**-**	130	(62)	(68)	**-**
Increases due to due to origin and acquisition	655	729	3,854	**5,238**	5,524	1,806	380	**7,710**
Increases due to COVID-19 Impairment Management overlay	12,968	2,425	-	**15,393**	-	-	**-**	
Changes as a result of repayments	(664)	(129)	(332)	**(1,125)**	(6,586)	(1,941)	(454)	**(8,981)**
31.12.2020	**14,724**	**3,744**	**7,415**	**25,883**	**116,440**	**18,842**	**9,789**	**145,071**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

For all exposures affected by the COVID-19 crisis, the Bank applies additional provisions (Management Overlays provision) under the following conditions:

- The amount of the additional provision (Management Overlays provision) is measured in the hypothesis of the migration from Phase 1 to Phase 2 and the change of the rating with 1 degree, without a change in the other risk parameters.
- For all exposures for which additional provision is reported (Management Overlays provision), in case of a significant increase of the credit risk, the exposure is reclassified in Phase 2 and the Management Overlays provision is reintegrated. In the case of the hypothesis under which is identified impairment trigger, the exposure is reclassified in Phase 3 and the relevant provisions are calculated.

BGN'000 **2020**

	Gross amount before impairment COVID-19	COVID-19 Impairment losses	Management Overlays	Total
COVID-19 Phase 1 (Performing)	116,440	1,756	12,968	14,724
COVID-19 Phase 2 (Monitored)	3,540	257	2,425	2,682
Total	**119,980**	**2,013**	**15,393**	**17,406**

The updated criteria for portfolio provisioning in the light of the COVID-19 crisis apply from 19.05.2020 based on a decision of the Bank's Risk Committee.

For the loans subject to moratorium, the Bank has adopted additional triggers for transfer Phase 2 and 3, required by IFRS 9.B5.5.1 to IFRS 9.B5.5.18. The default-based triggers are not a factor for the assessment for Phase 2 considering that the days past due are counted only based on the revised repayment schedule.

Additionally, for exposures that benefit from moratoria, the Bank reflects additional restructuring in awarding assessment for the parameter PD based on the probability of default for the whole term of the exposure (lifetime PD) and conservative change of the rating by one degree assuming a conservative approach although the applied model includes explicit impairment of the probability of default as a result of worsening of the macro environment.

The Bank applies a conservative approach concerning the triggers for transfer between the Phases in the meaning of IFRS 9, defined based on each impairment by one grade, to which the relevant absolute PD corresponds. The Bank has not introduced higher relative thresholds for transfer between stages for obligors with higher PD respectively worse ratings. The rules transfers between Phases have not been changed as a result of the COVID-19 pandemic i.e. Upon occurrence or for more variable migrations of ratings.

The Bank adheres to good practices by applying the provision for calculating provisions in the case of the transfer to Phase 2 for those cases in which individual assessments are not possible or the ordinary indicators do not work.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)
Credit risk management in regard of COVID-19 pandemic, (continued)

The calculation of the provisions for Phase 2 applies to all exposures with measures under the moratorium, which are not classified in Phase 3. This approach allows prompt recognition of the effects of the coronavirus pandemic (COVID-19) and eliminates any need for “huge revision upwards” at a later stage.

The Bank takes into account IFRS 9.5.5.11 and considers that all COVID-19 exposures more than 30 days past due have experienced a significant increase in credit risk and assesses provisions for them for Phase 3.

In addition to the statistical data, according to IFRS 9.B5.18, the Bank uses high-quality information to determine which exposures require that the estimated lifetime exposures are recognized. The information used for that purpose is consistent with the impairment triggers used upon monitoring of the clients and the portfolios and includes also elements as an applied measure for restructuring, increased indebtedness, unstable repayment, and breach of the crediting policy. In this regard, the Bank has adopted also an operational plan for assessment of the unlikeliness to pay.

Concerning the requirements of IFRS 9.B5.5.17 (f) and IAS 9.B5.5.17 (i) the Bank carries out sectoral analysis and thus takes into account all unfavourable changes in the business, financial and economic environment of the borrower. The Bank takes into account that the borrowers are affected (directly or indirectly) by the coronavirus pandemic (COVID-19) to a different extent, depending on their sector. In this regard, the macroeconomic information and/ or the unfavourable impact on the business of specific sectors may show that there is a significant increase in the credit risk for unfavourably affected exposures. The Bank may carry out transfer to Phase 2 only due to these specific circumstances unless there is more detailed information showing that the exposures may remain in Phase 1.

BGN’000	**2020**		
Concentration by sectors of COVID-19 exposures	**Gross amount before impairment COVID-19**	**COVID-19 Impairment losses**	**COVID-19 Management overlay**
State governance	-	-	-
Administrative and auxiliary services	452	5	5
Transactions with real properties	9,401	259	1,530
Processing industry	4,307	262	15
Production and distribution of electrical and heat energy	5,149	28	88
Professional activities and scientific researches	1,025	425	0
Agriculture, forestry and fishery	2,656	113	187
Civil Engineering	688	277	5
Development and distribution of information and creative products; telecommunications	293	3	2
Transport, warehousing, and posts	7,130	398	359
Trade, repair of motor vehicles and motorcycles	10,710	1,272	1,456
Financial and insurance services	162	8	0
Hotel Management and Restaurant Management	57,141	1,191	8,318
Other	2,593	185	96
	101,707	**4,426**	**12,061**
Loans to the population			
Mortgage loans	36,181	4,732	2,497
Consumer loans	7,183	1,332	835
	43,364	**6,064**	**3,332**
Total	**145,071**	**10,490**	**15,393**

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

The Bank has carried out the relevant analyses, which lead to the conclusion that the unfavourable effects ensuing from business, financial and economic environment do not affect the whole portfolio. Allianz Bank Bulgaria AD applies analytical approaches for systematic determination which parts of the portfolio have not suffered a significant increase in the credit risk. Assessments are supported by the individual rating of each obligor.

Restructuring measures that are inconsistent with the EBA Guidelines concerning the moratorium for payment lead to transfer at least to Phase 2. Based on the technical criteria: Defaulted Flag, number of restructuring measures, past default status, the Bank relates each exposure to predefined risk classification groups. In case of more than 30 days past due or availability of other impairment triggers, the exposure is classified in Phase 3.

Financial assets - modification

When the contractual cash flows from a financial asset are renegotiated or modified otherwise and renegotiation or modification does not result in writing-off this financial asset in compliance with IFRS 9, the Bank recalculates the gross book value of the financial asset and recognizes profit or loss from modification in the profit and loss account.

The gross book value of the financial asset is recalculated and the present value of the renegotiated or modified contractual cash flows, which are discounted with the initial effective interest rate for the financial asset (or adjusted for credit losses effective interest rate for purchased or initially created financial assets with credit impairment) or, if applicable, with the revised effective interest rate calculated according to paragraph 6.5.10 of IFRS 9.

In a situation in which renegotiation is due to financial difficulties of the counter-party and inability to make the initially agreed repayments, the Bank compares the initial and revised estimated cash flows with the assets to determine whether the risks and the benefits from the asset are considerably different as a result of the contract change. If the risks and benefits do not change, the modified asset does not differ considerably from the initial asset and the modification does not result in writing off.

The moratoria on repayments provided by the Bank in response to the COVID-19 pandemic are treated as contractual modifications of the relevant loans and prepayments. Their impact on the gross book value (loss from modification) is presented on the profit or loss account.

If the amended conditions are considerably different, the rights on the cash flows from the initial asset expire, the Bank writes off the initial financial asset and recognizes a new asset at its fair value.

The date of renegotiation is considered the date of initial recognition for subsequent calculation of impairment, including a determination of whether a significant increase of credit risk (SICR) has occurred.

The Bank also evaluated whether the new loan or debt instrument meets the criterion for SPPI test - only payment of principal and interest on the outstanding amount of the principal.

Every difference between the book value of the written-off initial asset and the fair value of the new significantly modified asset is recognized in the profit or loss account.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

Measures taken by the Managament of the Bank to address the crisis:

In accordance with the measures taken by the Government of the country and the Management Board of the Bulgarian National Bank, the Bank's management has taken a number of actions and measures related to:

- Organization for ensuring the continuity of services and processes;
- Working conditions and a protected environment appropriate to the situation, the focus being on healthy and safe working conditions;
- Communication and status monitoring of the COVID-19 situation;
- Information technology and infrastructure;
- Customer service and compliance;
- Key indicators for the performance and performance of the Bank have been defined.

Measures to mitigate the effects of the crisis and protect the business

- Introducing credit limits for specific sectors, industries and products;
- Identification of critical business activities and alternative substitutes;
- Measures to cover the credit risk - supervisory regulations, daily monitoring of early deterioration signals, monitoring of sources for repayment of loans, monitoring of defined critical indicators in the credit portfolio, collateral and additional analyzes;
- Market risk cover measures - strict monitoring, calculation of Value ar risk, stress tests, asset and liability management;
- Active communication with clients with exposures in excess of BGN 500 thousand, in anticipation of operational and liquidity problems.

(c) Liquidity Risk

Liquidity risk occurs with regard to ensuring funds for the Bank's activities and the management of its positions. It has two dimensions – risk that the Bank will be unable to cover its liabilities when they become due; and risk of inability to realize its assets at a suitable price and within an acceptable timeframe.

Liquidity risk management

The Bank's approach to liquidity management is to ensure to the greatest degree possible the ability to always have sufficient liquidity to cover its liabilities when called, both under normal circumstances and in an emergency, without taking extraordinary losses or affecting the Bank's reputation.

The Liquidity and markets Division receives information from other business units regarding the liquidity of financial assets and liabilities and details about other expected cash flows arising from projected future activities. The Liquidity and Markets Division maintains a portfolio of liquid assets which consists mainly of liquid securities, loans and receivables from banks, and other money market instruments. The objective is to maintain sufficient liquidity within the Bank as a whole.

6. Disclosure of the financial risk management policy, (continued)

(b) Credit Risk, (continued)

Credit risk management in regard of COVID-19 pandemic, (continued)

Liquidity is monitored daily, and stress tests are performed periodically according to various scenarios which cover both normal and extraordinary market circumstances. All liquidity policies and procedures are subject to review and approval by the ALMC. Daily reports cover the liquidity position of the Bank. A summary report, including analyzes, plans, reports and actions taken, is reviewed and accepted periodically / monthly by the ALMC.

Funds are attracted through a set of instruments including deposits and current accounts, credit lines, other legally regulated borrowings, and equity. Funds from different types of clients are attracted, most of them from citizens and households, as well as from small and medium-sized enterprises. In addition, there are deposits from non-bank financial institutions and credit lines from development banks. An insignificant part of the funds is attracted from the interbank money market. In this way, the opportunity for flexibility when financing the activities of Allianz Bank Bulgaria AD is increased, the dependence on one source of funds is reduced, and the value of attracted resource is decreased. The Bank aims to maintain balance between term and attracted resource, and flexibility in the use of funds with different maturity structure.

The Bank performs current assessments of liquidity risk by identifying and tracking changes with regard to the need for funds to achieve the aims embedded in the overall strategy of Allianz Bank Bulgaria AD. In addition, the Bank owns and maintains a portfolio of liquid assets as part of its liquidity risk management system.

Liquidity risk exposure

For liquidity risk monitoring and management, the Bank calculates various indicators such as the secondary liquidity ratio, LCR, NSFR, and survival period. Available cash and cash equivalents, funds in current accounts with banks, and interbank deposits up to 7 days, state securities of the Bulgarian government, gold, debt securities suitable for trading issued by international development banks and international organizations are considered liquid assets. The calculation of the ratios is used in order to measure the Bank's compliance with liquidity indicators recommended by BNB.

The ratios of net liquid assets to client deposits at the reporting date and during the reporting period is as follows:

	2020	**2019**
as at 31 December	43.50%	42.82%
Average over the period	44.60%	42.80%
Maximum for the period	46.60%	45.26%
Minimum for the period	44.00%	40.88%

Residual maturity of financial assets and liabilities

The table below presents the undiscounted cash flows of the Bank's financial liabilities and unrecognized credit commitments based on the earliest possible maturity date. Gross Nominal incoming (outgoing) Cash Flow is the agreed undiscounted cash flow from the financial liability or commitment. Interest income or interest expense, respectively, is included in the respective financial asset or liability from the date of the last interest payment until the end of the maturity.

6. Disclosure of the financial risk management policy, (continued)

(c) Liquidity Risk, (continued)

Residual maturity of financial assets and liabilities , (continued)

The imbalance observed in the first period of less than a month is mainly due to the inclusion of current accounts for customers in this time period. The Bank's experience shows that customer deposits are expected to maintain a steady or growing balance, and not all unrecognized credit commitments are expected to be absorbed immediately.

31 December 2020 *In BGN thousand*	**Carrying amount**	**Gross nominal incoming / (outgoing) cash flow**	**Less than 1 month**	**From 1 to 3 months**	**From 3 months to 1 year**	**From 1 to 5 years**	**More than 5years**
Cash and cash equivalents	981,561	981,576	981,576	-	-	-	-
Financial assets measured at FVPL	3	3	-	-	-	-	3
Loans and advances to banks	39,059	39,760	29,982	-	9,778	-	-
Investment securities	678,599	679,035	-	16,891	112,988	405,023	144,133
Loans and advances to clients	1,547,666	2,039,287	263,234	69,124	133,086	394,174	1,179,669
Other financial assets	512	512	512	-	-	-	-
	3,247,400	**3,740,173**	**1,275,304**	**86,015**	**255,852**	**799,197**	**1,323,805**
Deposits from banks	28,156	(29,154)	(194)	-	-	-	(28,960)
Deposits from clients	2,983,881	(2,984,594)	(2,252,116)	(167,338)	(424,623)	(140,517)	-
Lease liabilities	8,431	(8,600)	-	-	(2,693)	(4,826)	(1,081)
Other long-term borrowed funds	4,956	(4,956)	(772)	(6)	(69)	(4,109)	-
Other liabilities	2,607	(2,607)	(2,607)	-	-	-	-
	3,028,031	**(3,029,911)**	**(2,255,689)**	**(167,344)**	**(427,385)**	**(149,452)**	**(30,041)**
Guarantees and letters of credit	48,758	(48,758)	(6,568)	(5,701)	(16,131)	(7,796)	(12,562)
Unutilized credit commitments	117,909	(117,909)	(7,309)	(12,600)	(84,621)	(6,058)	(7,321)
	3,194,698	**(3,196,578)**	**(2,269,566)**	**(185,645)**	**(528,137)**	**(163,306)**	**(49,924)**

6. Disclosure of the financial risk management policy, (continued)

(c) Liquidity Risk, (continued)

Residual maturity of financial assets and liabilities , (continued)

31 December 2019 *In BGN thousand*	**Carrying amount**	**Gross nominal incoming / (outgoing) cash flow**	**Less than 1 month**	**From 1 to 3 months**	**From 3 months to 1 year**	**From 1 to 5 years**	**More than 5years**
Cash and cash equivalents	760,076	760,088	760,088	-	-	-	-
Financial assets measured at FVPL	4	4	-	-	-	-	4
Loans and advances to banks	19,541	19,546	9,767	-	9,779	-	-
Investment securities	704,285	704,789	19,415	11,686	93,561	513,189	66,938
Loans and advances to clients	1,367,509	1,811,638	269,588	15,576	142,176	347,690	1,036,608
Other financial assets	5,511	5,511	5,511	-	-	-	-
	2,856,926	**3,301,576**	**1,064,369**	**27,262**	**245,516**	**860,879**	**1,103,550**
Deposits from banks	31,601	(32,950)	(135)	-	-	-	(32,815)
Deposits from clients	2,587,467	(2,588,353)	(1,897,760)	(140,271)	(414,386)	(135,936)	-
Lease liabilities	7,876	(8,228)	-	-	(2,588)	(5,019)	(621)
Other long-term borrowed funds	7,021	(7,021)	(582)	(20)	(742)	(4,906)	(771)
Other liabilities	7,583	(7,583)	(7,583)	-	-	-	-
	2,641,548	**(2,644,135)**	**(1,906,060)**	**(140,291)**	**(417,716)**	**(145,861)**	**(34,207)**
Guarantees and letters of credit	43,777	(43,777)	(3,699)	(8,395)	(9,532)	(10,552)	(11,599)
Unutilized credit commitments	126,293	(126,293)	(35,677)	(16,706)	(56,605)	(8,698)	(8,607)
	2,811,618	**(2,814,205)**	**(1,945,436)**	**(165,392)**	**(483,853)**	**(165,111)**	**(54,413)**

6. Disclosure of the financial risk management policy, (continued)

(d) Market risk

Market risk is the risk that a change in market conditions or parameters affecting market conditions such as interest rates, equity prices, or exchange rates for foreign currencies will affect the income or value of financial instruments held by the Bank. The market risk management policy aims to manage and control market risk exposures within the allowable limits, optimizing the risk / return ratio.

Exposure to market risk

All marketable instruments are subject to market risk as a result of future changes in market conditions. Instruments are measured at fair value and any changes in market conditions directly affect net trading income.

Allianz Bank Bulgaria AD manages its tradable instruments under the changing market conditions. Exposure to market risk is managed in accordance with exposure limits, concentration on instrument types and VaR limits.

The method used to measure and manage market risk is the so-called Value at Risk (VaR). VaR is an indicator of the expected loss from trading portfolio for a certain period of time (holding period) and a certain probability level (confidence level). The VaR model used by the Bank is based on a 99% confidence level and a ten-day holding period. The VaR model is based on historical data from a minimum of 250 day observation period.

Although VaR is an important tool in measuring market risk, the assumptions on which the model is based lead to some constraints:

- The ten-day holding period suggests that it is possible to hedge or release positions in that period. This is considered a real assumption in almost all cases except in situations where there is low market liquidity over a prolonged period of time.
- The 99% confidence level does not account for any losses that may arise beyond that level. Even within the model, there is a 1% probability that losses may exceed VaR.
- VaR is calculated at the end of each day and does not take account of the risks that may arise during the trading day / trading session.
- VaR depends on the position of the Bank and the volatility of market prices. The VaR in unchanged position decreases when the volatility of market prices decreases and vice versa.

Exposure to market risk - Financial assets at fair value through profit and loss

The financial assets at fair value through profit and loss as of 31.12.2020 and 31.12.2019 does not include instruiments measurable for market riskq according to the adopted by the Bank policy to invest in financial assets from other class.

6. Disclosure of the financial risk management policy, (continued)

(d) Market risk, (continued)

Exposure to market risk - Financial assets at fair value through other comprehensive income

The 10-day VaR of the Bank's financial assets at fair value through through other comprehensive income as of 31.12.2020 and 31.12.2019 and the one-year period are as follows:

In BGN thousand	**As at 31.12**	**Average**	**Maximum**	**Minimum**
Financial assets at fair value through other comprehensive income				
2020				
Currency Risk	657	35	663	-
Interest Risk	273	201	292	140
Other price risk	-	-	-	-
Correlation	(216)	(15)	(234)	-
	714	**221**	**721**	**140**

In BGN thousand	**As at 31.12**	**Average**	**Maximum**	**Minimum**
Financial assets at fair value through other comprehensive income				
2019				
Currency Risk	178	182	185	178
Interest Risk	205	172	215	141
Other price risk	-	-	-	-
Correlation	(115)	(103)	(115)	(90)
	268	**251**	**285**	**229**

The interest rate levels in the current year are gradually decreasing, reaching their minimum values at the end of the reporting period, reflecting declining portfolio duration and low volatility of bond market yields. The share of currency risk in the total value at risk at the end of the reporting period remained relatively unchanged compared to 2016.

The 1-day VaR of the Monte Carlo simulation at 99% confidence interval as at 31 December and during the reporting period is as follows:

In BGN thousand	**2019**	**2019**
As at 31 December	1,037	847
Minimum for the period	688	847

Interest risk sensitivity analysis

For the management of interest rate risk and interest rate changes, observations are made on the sensitivity of the Bank's financial assets and liabilities in applying scenarios to the movement of interest rates.

Sensitivity analysis is based on the scenario of 100 basis points parallel increase of all profitability curves of all currencies simultaneously.

6. Disclosure of the financial risk management policy, (continued)

(d) Market risk, (continued)

Interest risk sensitivity analysis, (continued)

The model for the measuring of market risk is based on the analysis of imbalance (GAP analysis). It is used to measure the Bank's potential loss arising from projected changes in market interest rates under the hypothesis of parallel movement of interest curves.

The model is applied to the banking and trading book at the end of the year.

Bank performs calculations for 6 scenarios, the results of which are shown in the table below, while parallel shock hypotheses are at 200 Bps, for a short-term shock of 250 bps, and a long-term shock of 100 Bps, according to Annex II Interest rate risk in banking book (EBA):

Scenarios 2020	**Sensitivity to interest of the value of equity (EVE)**		**Net interest income**
	%	BGN thousand	BGN thousand
parallel upward shock;	-8.40%	(19,012)	(15,914)
parallel downward shock;	8.40%	19,012	15,914
short-term interest downward and long-term upward (steepener);	-7.28%	(16,475)	
short-term interest upward and long-term downward (flattener);	0.98%	2,216	
short-term interest upward; and	-2.30%	(5,207))	
short-term interest downward	0.92%	2,083	

Scenarios 2019	**Sensitivity to interest of the value of equity (EVE)**		**Net interest income**
	%	BGN thousand	BGN thousand
parallel upward shock;	-9.49%	(17,589)	(11,281)
parallel downward shock;	9.49%	17,589	11,281
short-term interest downward and long-term upward (steepener);	-9.02%	(16,723)	
short-term interest upward and long-term downward (flattener);	1.91%	3,532	
short-term interest upward; and	-2.03%	(3,759)	
short-term interest downward	0.81%	1,504	

Currency Risk

The Bank is exposed to currency risk in transactions with financial instruments denominated in foreign currency .

As a result of the introduction of a Currency Board in Bulgaria, the Bulgarian lev is fixed to the EUR. As the currency in which the Bank compiles its accounts is the Bulgarian lev, the movements in the exchange rates of the lev against the non-euro area currencies affect the accounts.

Transactions in foreign currencies result in income and expenses from foreign exchange transactions that are reported in the income statement. Such exposures are the Bank's cash assets and liabilities denominated in a currency other than the Bank's presentation currency . These exposures in foreign currency are presented in the table below.

6. Disclosure of the financial risk management policy, (continued)

(d) Market risk, (continued)

Currency risks, (continued)

In BGN thousand	**31 December 2020**				
	BGN	**EUR**	**USD**	**Other currencies**	**Total**
Assets					
Cash and cash equivalents	694,540	93,439	176,547	17,035	981,561
Financial assets measured at FVPL	3	-	-	-	3
Loans and advances to banks	-	39,059	-	-	39,059
Financial assets measured at FVOCI	17,979	176,663	15,414	-	210,056
Financial assets measured at AC	111,152	357,391	-	-	468,543
Loans and advances to clients	947,816	593 379	6 471	-	1,547,666
Total assets	**1,771,490**	**1,259,931**	**198,432**	**17,035**	**3,246,888**
Liabilities					
Deposits from banks	169	27,962	25	-	28,156
Deposits from other clients	1,796,452	950,883	220,587	15,959	2,983,881
Other borrowed funds	-	4,956	-	-	4,956
Leased liabilities	8,431	-	-	-	8,431
Total liabilities	**1,805,052**	**983,801**	**220,612**	**15,959**	**3,025,424**
Net currency position	**(33,562)**	**276,130**	**(22,180)**	**1,076**	**221,464**

6. Disclosure of the financial risk management policy, (continued)

(d) Market risk, (continued)

Currency risks, (continued)

In BGN thousand **31 December 2019**

	BGN	**EUR**	**USD**	**Other currencies**	**Total**
Assets					
Cash and cash equivalents	521,734	75,075	149,388	13,879	760,076
Financial assets measured at FVPL	4	-	-	-	4
Loans and advances to banks	-	19,541	-	-	19,541
Financial assets measured at FVOCI	20,846	180,803	8,063		209,712
Financial assets measured at AC	96,212	398,361	-	-	494,573
Loans and advances to clients	842,405	514,436	10,668		1,367,509
Total assets	**1,481,201**	**1,188,216**	**168,119**	**13,879**	**2,851,415**
Liabilities					
Deposits from banks	112	31,489	-	-	31,601
Deposits from other clients	1,678,957	713,717	181,065	13,728	2,587,467
Other borrowed funds	-	7,021	-	-	7,021
Leased liabilities	7,876	-	-	-	7,876
Total liabilities	**1,686,94**	**752,227**	**181,065**	**13,728**	**2,633,965**
Net currency position	**(205,744)**	**435,989**	**(12,946)**	**151**	**217,450**

(e) Compliance with capital adequacy requirements

The Bank determines its risk-taking capacity on the basis of available capital resources available to cover losses arising from the Bank's risk profile. The Bank manages its venture capital, observing the regulatory requirements and its own strategy.

The minimum requirements applicable to Bulgaria under the requirements of Directive 2013/36 / EC and Regulation (EU) No 575/2013 introduced in 2014 include the maintenance of a Total Capital Adequacy ratio of not less than 13.5% and Tier 1 Capital Adequacy ratio of not less than 11.5%. These levels include 8% of total capital adequacy and 6% of Tier 1 capital adequacy respectively, as well as 2.5% Capital Maintaining Buffer and 3% Systemic Risk Buffer.

The Bank complies with the Minimum Capital Adequacy Regulatory Requirements.

6. Disclosure of the financial risk management policy, (continued)

(e) Compliance with capital adequacy requirements, (continued)

In accordance with the regulatory framework, the Bank distributes capital to cover the capital requirements for credit risk, market risk and operational risk, using the Standardized Approach.

Capital base (equity)

The capital base (equity) includes Tier 1 and Tier 2 capital, in accordance with the applicable regulatory requirements.

The Bank prepares quarterly supervisory and monthly internal reports in accordance with the requirements of Ordinance No 8 of the Bulgarian National Bank (BNB) of 24 April 2014 on the capital buffers of banks and Implementation Regulation (EU) No 680 of 2014 on an individual basis.

The Bank complies with the regulatory capital adequacy requirements and discloses its annual data to the BNB according to Regulation (EU) No 575/2013 (Eighth part) and the Credit Institutions Act (Article 70 (3)).

The Bank has selected the Basic indicator approach to calculate operational risk, according to Regulation (EU) No 575/2013.

The Bank monitors changes in major exposure classes, capital base, and total capital adequacy on a monthly basis, and reports the levels of regulatory and internal capital to the Management and Supervisory Board, and prepares quarterly reports, which it presents to the BNB within the timeframe set out in Regulation 680/2014. According to art. 92 of Regulation 575 of the European parliament and of the Council of 26 June 2013, minimum requirements for the ratios of capital adequacy of Tier 1 capital and of Total capital adequacy are respectively no less than 6% and no less than 8%.

At the end of 2020, Allianz Bank Bulgaria AD complied with the recommendations of BNB (decision of the BNB MB of 20.12.2019 and 160/24.04.2019) for capital stability – that total capital adequacy should be no less than 14.25%, formed based on:

- the requirement for 8% capital adequacy,
- - systemic risk buffer of 3%,
- safety capital buffer of 2.5%,
- countercyclical capital buffer of 0.5%

7. Use of estimates and assumptions

The presentation of a financial statement in accordance with International Financial Reporting Standards requires management to make the best estimates, accruals and reasonable assumptions that have an effect on the reported amounts of assets and liabilities, income and expense, and the disclosure of contingent liabilities and contingent liabilities at the reporting date. These estimates, accruals and assumptions are based on the information available at the date of the financial statements, so the future factual results could be different from them.

Estimates and the underlying assumptions are reviewed on an ongoing basis. Revised accounting estimates are recognized in the period in which the measurement is reviewed and in all future periods.

7. Use of estimates and assumptions, (continued)

Uncertainty in the assumptions and estimates

The Bank makes assumptions and assessments of uncertain events, including assumptions and assessments of the future. Such accounting assumptions and assessments are reviewed on an ongoing basis and are based on historical experience and other factors such as the expected flow from a future event that can reasonably be assumed under the circumstances but is nevertheless required to constitute a source of suspected uncertainty. The assessment of impairment of the portfolio by credit risk groups and, as a part, the assumptions about the realizable value of collateral - real estate - represents the main source of uncertainty in the valuation. This and other major sources of uncertainty in the estimates that carry a significant risk of a possible material adjustment of the carrying amount of assets and liabilities in subsequent reporting periods are described below and in the following notes.

Assessment of Expected credit lose ECL

Calculation of expected credit lose for financial assets at amortized cost and financial assets thru other comprehensive income requires the use of models and significant accounting judgments and assumptions about future economic conditions and the change in the credit quality of assets (for example, the probability of a client not meeting its obligations under the credit exposures and the losses to which it would result).

Significant accounting estimates and assumptions that IFRS 9 requires when calculating the expected credit loss are:

- Determining the criteria for a significant increase in credit risk
- Selection of appropriate models and for the calculation of ECL
- Selecting appropriate economic variables for preparing future information
- Determining the weight of each scenario for the future development of the selected economic variables

The full description of the judgments and the manner of estimating the expected credit loss are described in paragraph 5.

The specific component of the total provision for impairment for a single counterparty relates to financial assets that are individually assessed for impairment and is based on the management's best estimate of the present value of the cash flows expected to be received. When assessing these cash flows, the management makes judgments about the counterparty's financial position and the net realizable value of the collateral. Each impaired asset is measured individually, the strategy for recovering the impaired asset and the estimated cash flows that are considered recoverable are approved regardless of the credit risk assessment function.

Collectively assessed impairment losses cover losses on loans inherent in loan portfolios and receivables with similar credit risk characteristics when there is objective evidence that they contain impaired loans and receivables but individual impaired assets can not be identified. When assessing the need for portfolio impairment losses, management takes into account factors such as loan quality, portfolio size, concentrations and economic factors. In order to assess the necessary provision for impairment, assumptions are made to determine how inherent losses are based on historical experience and current economic conditions. The accuracy of the provisions depends on the estimates of future cash flows for the impairment losses of a particular counterparty as well as on the assumptions and parameters of the models used to determine the impairment losses on a portfolio basis.

7. Use of estimates and assumptions, (continued)

Uncertainty in the assumptions and estimates, (continued)

Determining the fair value of financial instruments

The determination of the fair value of financial assets and liabilities for which there is no observable market price requires the use of valuation techniques described in accounting policy 5 (e) (vi). For financial instruments that are rarely traded and whose price is not available or observed on the market, fair value is less objective and requires a range of ratings depending on liquidity, concentration, uncertainty of market factors, price assumptions and other risks affecting the specific instrument.

Evaluation of financial instruments

The Bank measures fair value using the following hierarchy of methods:

- Level 1: the level 1 incoming data are the quoted (unadjusted) prices of instruments at active markets for identical financial instruments;
- Level 2- the level 2 incoming data are the incoming data for an asset or a liability different from the quoted prices included at level 1 which are directly or indirectly accessible for observation. This category includes instruments, measured using: quoted prices of similar assets or liabilities at active markets; quoted prices of identical or similar assets or liabilities at markets which are not considered active; other valuation techniques where all the significant incoming data are directly or indirectly accessible for observation using market data;
- Level 3: the level 3 incoming data are non-observable incoming data for an asset or a liability. This category includes all the instruments whereupon the valuation technique does not include observable incoming data, and the non-observable incoming data have a significant impact on the instrument valuation. This category includes instruments valuated on the basis of quoted prices of similar instruments where significant non-observable adjustments or assumptions are required to reflect the differences among the instruments.

The fair value of financial assets and financial liabilities that are traded in active markets are based on quoted market prices on stock or dealer markets. For all other financial instruments The Bank defines fair values using other valuation techniques.

Other valuation techniques include models based on present value and discounted cash flows compared to similar instruments for which observable market prices, option pricing models and other models exist. Assumptions and incoming data used in assessment techniques include risk-free and reference interest rates, credit spreads and other premiums used in determining discount rates, prices of debt and equity securities, exchange rates and prices of equity indices and expected fluctuations and correlation of prices.

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

7. Use of estimates and assumptions, (continued)

Uncertainty in the assumptions and estimates, (continued)

Determining the fair value of financial instrument, (continued)

Financial instruments measured at fair value – hierarchy

The following table analyzes financial instruments measured at fair value through the fair value hierarchy.

In BGN thousand	**Level 1- Announced Market Prices in Active Markets**	**Level 2 - Evaluation techniques - using market data**	**Level 3 - Evaluation techniques - without market data**	**Total**
2020				
Financial assets measured at FVPL	-	3	-	3
Financial assets measured at FVOCI	206,374	-	3,682	210,056
Total:	**206,374**	**3**	**3,682**	**210,056**

In BGN thousand	**Level 1- Announced Market Prices in Active Markets**	**Level 2 - Evaluation techniques - using market data**	**Level 3 - Evaluation techniques - without market data**	**Total**
2019				
Financial assets measured at FVPL	-	4	-	4
Financial assets measured at FVOCI	206,527	-	3,285	209,712
Total:	**206,527**	**4**	**3,185**	**209,716**

7. Use of estimates and assumptions, (continued)

Uncertainty in the assumptions and estimates, (continued)

Determining the fair value of financial instrument, (continued)

Financial instruments measured at fair value – hierarchy, (continued)

(i) Reconciliation of Level 3 fair value

The following table presents a reconciliation of the movement from the opening to the closing balance of the Level 3 fair values

In BGN thousand	**Equity and debt securities measured at FVOCI**
Balance as at 1 January 2020	3,185
Profit included in other comprehensive income	
Net change in fair value (unrealized)	497
Balance as at 31 December 2020	**3,682**
Balance on 1 January 2019	**1,390**
Profit included in other comprehensive income	
Net change in fair value (unrealized)	1,795
Balance as at 31 December 2019	**3,185**

7. Use of estimates and assumptions, (continued)

Determining the fair value of financial instrument, (continued)

Financial instruments not measured at fair value - hierarchy

The table below analyzes the fair values of financial instruments not measured at fair value through a fair value hierarchy where the fair value is categorized. In the table is not included information about the fair values of financial assets and liabilities that are not measured at fair value if the carrying value is approximately equal the fair value.

31 DECEMBER 2019 *In BGN thousand*	**Level 1**	**Level 2**	**Level 3**	**Total fair value**	**Total carrying amount**
Assets					
Cash and cash equivalents	-	981,561	-	981,561	981,561
Loans and advances to banks	-	39,059	-	39,059	39,059
Financial assets measured by amortized cost	468,543	-	-	468,543	468,543
Loans and advances to clients	-	-	1,547,666	1,547,666	1,547,666
Total assets	**468,543**	**1,020,620**	**1,547,666**	**3,036,829**	**3,036,829**
Liabilities					
Deposits from banks	-	-	28,156	28,156	28,156
Deposits from clients	-	-	2,983,881	2,983,881	2,983,881
Other borrowed funds	-	-	4,956	4,956	4,956
Total liabilities	-	-	**3,016,993**	**3,016,993**	**3,016,993**

7. Use of estimates and assumptions, (continued)

Determining the fair value of financial instrument, (continued)

Financial instruments not measured at fair value – hierarchy, (continued)

31 DECEMBER 2019 *In BGN thousand*	**Level 1**	**Level 2**	**Level 3**	**Total fair value**	**Total carrying amount**
Assets					
Cash and cash equivalents	-	760,076	-	760,076	760,076
Loans and advances to banks	-	19,541	-	19,541	19,541
Financial assets measured by amortized cost	494,573	-	-	494,573	494,573
Loans and advances to clients	-	-	1,367,509	1,367,509	1,367,509
Total assets	**494,573**	**779,617**	**1,367,509**	**2,641,699**	**2,641,699**
Liabilities					
Deposits from banks	-	-	31,601	31,601	31,601
Deposits from clients	-	-	2,587,467	2,587,467	2,587,467
Other borrowed funds	-	-	7,021	7,021	7,021
Total liabilities	**-**	**-**	**2,626,089**	**2,626,089**	**2,626,089**

The fair value of cash and cash equivalents, loans and advances to banks and other financial institutions, deposits from banks and other borrowed funds is approximately equal to their book value because they are short-term.

The fair value of loans granted to customers is based on observable market transactions. In cases where market information is not available, fair value measurement is based on valuation models, such as discounted cash flow techniques, applying interest rates to the reporting date for loans with similar terms and conditions, and accrued impairment.

The fair value of customer deposits is calculated using discounted cash flow techniques applying the interest rates currently available in the country for deposits with similar maturities and conditions.

7. Use of estimates and assumptions, (continued)

Critical accounting estimates and judgments for lease contracts

Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. The authenticity of accounting estimates and judgments is monitored regularly.

The Bank makes estimates and judgments for the purposes of the accounting and disclosure. The resulting accounting estimates will, by definition, seldom equal the related actual results. The estimates and assumptions that have a significant risk of causing a material adjustment to the carrying amounts of assets and liabilities within the next financial year are discussed below.

(a) Extension and termination options and critical judgements in determining the lease term

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

For leases of offices, vehicles and equipment, the following factors are normally the most relevant:

- If there are significant penalties to terminate (or not extend), the Bank is typically reasonably certain to extend (or not terminate).
- If any leasehold improvements are expected to have a significant remaining value, the Bank is typically reasonably certain to extend (or not terminate).
- When the above mentioned conditions are not met the Bank considers other factors including historical lease durations and the costs and business disruption required to replace the leased asset. Most extension options in offices and vehicles leases have not been included in the lease liability, because the Bank could replace the assets without significant cost or business disruption.

The lease term is reassessed if an option is actually exercised (or not exercised) or the Bank becomes obliged to exercise (or not exercise) it. The assessment of reasonable certainty is only revised if a significant event or a significant change in circumstances occurs, which affects this assessment, and that is within the control of the lessee.

As at 31 December 2020 and 31 December 2019, potential future cash outflows of respectively BGN 506 thousand and 2,849 thousand (undiscounted) have not been included in the lease liability because it is not reasonably certain that the leases will be extended (or not terminated).

During the current financial year, the financial effect of revising lease terms to reflect the effect of exercising extension and termination options was an increase in recognised lease liabilities and right-of-use assets of BGN 816 thousand.

8. Classification of financial assets and liabilities

In BGN thousand	**Reported at FVPL**	**Reported at AC**	**Loans and advances**	**Reported at FVOCI**	**Liabilities at amortized cost**	**Gross carrying amount**
31 December 2019						
Cash and cash equivalents	-	-	981,561	-	-	981,561
Financial assets reported at fair value through profit and loss.	3	-	-	-	-	3
Loans and advances to banks	-	-	39,059	-	-	39,059
Investment securities	-	468,543	-	210,056	-	678,599
Loans and advances to clients	-	-	1,547,666	-	-	1,547,666
Total financial assets	3	**468,543**	**2,568,286**	**210,056**	**-**	**3,246,888**
Deposits from banks	-	-	-	-	28,156	28,156
Deposits from clients	-	-	-	-	2,983,881	2,983,881
Other borrowed funds	-	-	-	-	4,956	4,956
Total financial liabilities	**-**	**-**	**-**	**-**	**3,016,993**	**3,016,993**

In BGN thousand	**Held for trading**	**Held to maturity**	**Loans and advances**	**Available for sale**	**Liabilities at amortized cost**	**Gross carrying amount**
31 December 2019						
Cash and cash equivalents	-	-	760,076	-	-	760,076
Financial assets reported at fair value through profit and loss.	4	-	-	-	-	4
Loans and advances to banks	-	-	19,541	-	-	19,541
Investment securities	-	494,573	-	209,712	-	704,285
Loans and advances to clients	-	-	1,367,509	-	-	1,367,509
Total financial assets	**4**	**494,573**	**2,147,126**	**209,712**	**-**	**2,851,415**
Deposits from banks	-	-	-	-	31,601	31,601
Deposits from clients	-	-	-	-	2,587,467	2,587,467
Other borrowed funds	-	-	-	-	7,021	7,021
Total financial liabilities	**-**	**-**	**-**	**-**	**2,626,089**	**2,626,089**

9. Net interest income

In BGN thousand	**2020**	**2019**
Net interest income		
Income from interest		
Interest income arising from:		
Loans and advances to banks	1,083	2,905
Loans and advances to clients	40,416	44,875
Bborrowed funds from clients	3,899	645
Investments	13,407	15,161
	58,805	**63,586**
Interest expenses		
Interest expense arising from:		
Deposits from banks	(297)	(454)
Deposits of clients and other borrowed funds	(600)	(2,283)
Other	(42)	(180)
	(939)	**(2,917)**
Net interest income	**57,866**	**60,669**

10. Net income from fees and commissions

In BGN thousand	**2020**	**2019**
Revenue from fees and commissions		
Revenue from fees and commissions, arising from:		
Cash transactions and cash transfers	11,684	12,243
Guarantees and letters of credit	699	636
Loans	3,534	3,923
Bank cards	6,119	6,292
Other	189	227
	22,225	**23,321**
Expenses for fees and deductions		
Expenses for fees and deductions, arising from:		
Servicing of current accounts	(45)	(43)
Bank card transactions	(2,696)	(2,769)
Transfers through RINGS	(193)	(179)
Other	(5,614)	(5,006)
	(8,548)	**(7,997)**
Net income from fees and commissions	**13,677**	**15,324**

11 Net income from trade operations

In BGN thousand	**2020**	**2019**
Net income from operations arising from:		
Financial assets reported at fair value through profit and loss	7	5
Financial assets at fair value through other comprehensive income	(2,058)	(1,846)
Currency trading	2,287	2,554
Net income from trade operations	**236**	**713**

12. Net income from investment operations

In BGN thousand	**2020**	**2019**
Income from operations arising from:		
Revenue from dividends	68	34
Income from investment operations	**68**	**34**

13. Administrative and other costs

In BGN thousand	**2020**	**2019**
Expenses for inventory	(430)	(453)
Expenditure on external services, incl. Audit	(6,652)	(6,901)
Management, marketing and other costs	(2,633)	(2,493)
Rental costs	(124)	(157)
Expenses for depreciation	(1,870)	(2,139)
Expenses for right of use depreciation	(3,449)	(3,234)
Staff expenses	(18,432)	(17,830)
Bank restructuring costs	(6,167)	(5,615)
Expenses for deposit guarantee	(3,694)	(3,737)
Other costs	(123)	(866)
Total administrative costs	**(43,574)**	**(43,425)**

The amounts accrued in 2020 for services provided by registered auditors for statutory independent financial audit are as follows: for PricewaterhouseCoopers Audit OOD – BGN 145,000 excluding VAT and for HLB Bulgaria OOD - BGN 16,000 excluding VAT. In 2020 the Bank has not charged amounts for other non-statutory audit services provided by registered auditors or members of the relevant network

The amounts accrued in 2019 for services provided by registered auditors for statutory independent financial audit are as follows: for PricewaterhouseCoopers Audit OOD - BGN 145,000 excluding VAT and for HLB Bulgaria OOD - BGN 16,000 excluding VAT.

13. Administrative and other costs, (continued)

Personnel expenses amount to BGN 18,432 thousand. (2019: BGN 17,830 thousand) and includes salaries, social security contributions and health insurance under local law. At the end of 2020 Allianz Bank Bulgaria AD employs 594 employees on an employment contract (2019: 601 employees).

14. Other operating income

In BGN thousand	**2020**	**2019**
Tariff tax revenue, subject to VAT	1,626	1,547
Other income, net	4,596	3,831
Other operating income, net	**6,222**	**5,378**

15. Tax expenses

a) *Taxes recognized in profit and loss*

In BGN thousand	**2020**	**2019**
Current taxes	(951)	(3,681)
Deferred taxes	(8)	(38)
Total profits tax recognized in profit or loss	**(959)**	**(3,719)**
Current tax expense in OCI	**(108)**	**(90)**

In BGN thousand		**2020**	
	Before taxes	Tax (expense)/ income	Net of taxes
Change in reserve from subsequent measurement of fair value of financial assets	1,108	(111)	997
Subsequent measurement of obligations under a defined benefit plan	(26)	3	(23)
	1,082	**(108)**	**974**

In BGN thousand		**2019**	
	Before taxes	Tax (expense)/ income	Net of taxes
Change in reserve from subsequent measurement of fair value of financial assets	958	(96)	862
Subsequent measurement of obligations under a defined benefit plan	(64)	6	(58)
	894	**(90)**	**804**

15. Income tax expenses, (continued)

***b)** Explanation of effective tax rate*

In BGN thousand	**2020**	**2019**
Profit before taxation	9,200	36,770
Nominal tax rate	10%	10%
Expected tax	920	3,677
Taxable permanent differences	46	45
Exempt revenue from dividends	(7)	(3)
	959	**3,719**
Effective tax rate	10.42%	10.11%

16. Cash and cash equivalents

In BGN thousand	**2020**	**2019**
Cash in hand	32,433	36,242
Balances with the Central Bank	754,951	539,757
Current accounts and deposits with banks with original maturity of up to 3 months	194,192	184,089
Impairment	(15)	(12)
Total cash and cash equivalents	**981,561**	**760,076**

Below are presented the funds under credit ratings. The rating agency Standard & Poor's has been used:

In BGN thousand	**2020**	**2019**
Cash in hand	32,433	36,242
The central bank BBB-	754,951	539,757
Current accounts and deposits with banks with original maturity of up to 3 months	**194,192**	**184,089**
AA	92	41
AA-	80,693	53,893
A+	-	47,439
A	37,735	20,118
A-	38,254	26,114
BBB+	16,150	16,856
BBB	25	39
BBB-	21,243	19,589
Total	**981,576**	**760,088**

Balances with the Central Bank include a current account with the BNB and minimum required reserves. The current account with the BNB is used for payments on the money market and the government securities market (GS) as well as for the purposes of settlement. The minimum required reserves with the BNB are interest-free and regulated on a monthly basis. Daily fluctuations are allowed. The shortage of funds on a monthly basis is sanctioned with penalty interest.

17. Financial assets at fair value through profit and loss

In BGN thousand	**2020**	**2019**
Financial assets at FVPL		
Corporate bonds	2	3
Other	1	1
Total financial assets at FVPL/ held for trading	**3**	**4**

Financial assets, at fair value through profit and loss as of 31.12.2018 include debt government securities, held by the Bank till their maturity date in 2019.

18. Loans and advances to banks and other financial institutions

In BGN thousand	**2020**	**2019**
Loans and advances to local banks	19,529	**-**
Loans and advances to foreign banks	19,530	19,541
Total loans and advances to bank	**39,059**	**19,541**

19. Investment securities

19.1. Financial assets reported at fair value in other comprehensive income

In BGN thousand	**2020**	**2019**
Government securities issued or guaranteed by Bulgaria	53,778	52,099
Government securities issued or guaranteed by Spain	31,910	36,006
Government securities issued or guaranteed by Portugal	4,069	4,242
Government securities issued or guaranteed by Romania	57,763	37,900
Government securities issued or guaranteed by USA	9,556	2,690
Government securities issued or guaranteed by Croatia	5,286	5,458
Corporate bonds	40,335	64,759
Equity securities	7,359	6,558
Financial assets at FVOCI	**210,056**	**209,712**

19.2. Financial assets reported at amortized cost

In BGN thousand	**2020**	**2019**
Government securities issued or guaranteed by Bulgaria	365,716	357,870
Government securities issued or guaranteed by Spain	9,839	17,983
Government securities issued or guaranteed by Macedonia	8,663	8,868
Government securities issued or guaranteed by Poland	9,536	9,609
Government securities issued or guaranteed by Romania	11,206	30,542
Government securities issued or guaranteed by Croatia	14,648	15,039
Government securities issued or guaranteed by Czech republic	17,238	17,881
Corporate bonds	31,697	36,781
Total financial assets at amortized cost / held to maturity	**468,543**	**494,573**
Total investment securities	**678,599**	**704,285**

20. Loans and advances to clients

In BGN thousand	**2020**	**2019**
Loans and advances to clients at amortized cost	1,310,228	1,142,517
Factoring receivables	30,567	38,293
Claims from a cash pool	205,473	185,406
Receivables under a finance lease	83,369	65,819
Minus losses from impairment	(81,971)	(64,526)
Total loans and advances to clients	**1,547,666**	**1,367,509**

(a) Credit product analysis

	2020	**2019**
Individuals		
Mortgage loans	521,739	453,510
Consumer loans	222,944	204,181
Credit cards	11,793	10,673
Other loans	84,271	67,219
	840,747	**735,583**
Entities		
Working capital loans	531,101	483,305
Investment loans	257,445	212,679
Credit cards	344	468
	788,890	**696,452**
Total loans and advances to clients at amortized cost	**1,629,637**	**1,432,035**
Impairment losses	(81,971)	(64,526)
Total loans and advances to clients, net of impairment	**1,547,666**	**1,367,509**

31.12.2020

Individuals	**Phase 1**	**Phase 2**	**Phase 3**	**Total**
Other loans	60,826	20,126	3,319	84,271
Mortgage loans	460,215	27,921	33,603	521,739
Credit cards	9,054	1,934	805	11,793
Consumer loans	195,718	14,997	12,229	222,944
Total	**725,813**	**64,978**	**49,956**	**840,747**
Entities				
Investment loans	242,356	12,725	2,364	257,445
Working capital loans	514,274	7,421	9,406	531,101
Credit cards	172	34	138	344
Total	**756,802**	**20,180**	**11,908**	**788,890**
Total loans and advances to clients at amortized cost	**1,482,615**	**85,158**	**61,864**	**1,629,637**
Impairment losses	(27,952)	(8,329)	(45,690)	(81,971)
Total loans and advances to clients, net of impairment	**1,454,663**	**76,829**	**16,174**	**1,547,666**

20. Loans and advances to clients, (continued)

(a) Credit product analysis, (continued)

31.12.2019

Individuals

	Phase 1	Phase 2	Phase 3	Total
Other loans	51,751	14,808	660	67,219
Mortgage loans	392,720	24,698	36,092	453,510
Credit cards	8,059	1,989	625	10,673
Consumer loans	181,734	12,452	9,995	204,181
Total	**634,264**	**53,947**	**47,372**	**735,583**

Entities

	Phase 1	Phase 2	Phase 3	Total
Investment loans	196,287	9,642	6,750	212,679
Working capital loans	458,493	9,906	14,906	483,305
Credit cards	267	29	172	468
Total	**655,047**	**19,577**	**21,828**	**696,452**
Total loans and advances to clients at amortized cost	**1,289,311**	**73,524**	**69,200**	**1,432,035**
Impairment losses	(11,742)	(4,617)	(48,167)	(64,526)
Total loans and advances to clients, net of impairment	**1,277,569**	**68,907**	**21,033**	**1,367,509**

(b) Receivables under a finance lease

A detailed description of the finance lease receivables is presented in the table below.

In BGN thousand	2020	2019
Gross investment in finance leases, receivables:		
Less than one year	4,538	7,219
Between one and five years	70,340	54,978
More than five years	6,742	2,250
	81,620	**64,447**
Unearned financial revenue	1,749	1,372
Net investment in finance lease	**83,369**	**65,819**
Minus losses from impairment	(4,709)	(1,010)
	78,660	**64,809**
Net investment in finance leases, receivables:		
Less than one year	4,093	6,989
Between one and five years	67,943	55,503
More than five years	6,624	2,317
	78,660	**64,809**

20. Loans and advances to clients, (continued)

(c) Impairment losses on loans and advances to clients

Individual provisions for impairment losses

In BGN thousand	**2020**	**2019**
Status as at 01 January	48,167	88,049
Accrued costs of impairment	15,963	17,863
Reintegrated	(11,234)	(16,526)
Written off	(7,206)	(41,219)
Status as at 31 December	**45,690**	**48,167**

Collective provisions for impairment losses

In BGN thousand	**2020 г.**	**2019**
Status as at 01 January	16,359	15,998
Accrued costs of impairment	25,285	6,012
Reintegrated	(5,363)	(5,651)
Written off	-	-
Status as at 31 December	**36,281**	**16,359**
Total	**81,971**	**64,526**

Impairment expense

In BGN thousand	**2020**	**2019**
Loans and advances	(24,651)	(1,698)
Securities	65	51
Off-balance and loan commitments	(686)	93
Receivables and cash equivalent	(23)	(369)
Total	**(25,295)**	**(1,923)**

20. Loans and advances to clients, (continued)

(c) Impairment losses on loans and advances to clients, (continued)

Loans and advances to customers during the year before impairment 2020

	Initial Balance 01.01.2020	Changes due to migration from Phase 1 to Phase 2	Changes due to migration from Phase 1 and Phase 2 to Phase 3	Changes due to migration from Phase 2 and Phase 3 to Phase 1	Increases due to occurrence and acquisition	Changes due to updating the institution's valuation methodology	Decrease of the correction due to derecognition	Changes due to repayments	Balance at the end of the period
Phase 1									
Cash pool and factoring	**223,699**		**(26)**		**12,341**				**236,014**
Loans and advances	**1,065,612**	**(31,682)**	**(6,691)**	**67**	**476,599**	**-**	**-**	**(257,304)**	**1,246,601**
Retail	**600,694**	**(17,836)**	**(4,488)**	**5**	**239,678**	**-**	**-**	**(132,636)**	**685,417**
Other loans	1,254	(77)	(9)	-	150	-	-	(553)	765
Mortgage loans	392,720	(9,086)	(2,709)	-	140,761	-	-	(61,471)	460,215
Credit cards	8,060	(280)	(81)	5	5,276	-	-	(3,926)	9,054
Consumer loans	181,734	(6,467)	(1,671)	-	83,658	-	-	(61,536)	195,718
Finance lease	16,926	(1,926)	(18)	-	9,833	-	-	(5,150)	19,665
Phase 1 Corporate	**464,918**	**(13,846)**	**(2,203)**	**62**	**236,921**	**-**	**-**	**(124,668)**	**561,184**
Investment loans	196,287	(5,436)	-	-	88,435	-	-	(36,930)	242,356
Credit cards	267	(9)	-	-	55	-	-	(141)	172
Working capital loans	234,794	(1,998)	(658)	-	123,795	-	-	(77,673)	278,260
Finance lease	33,570	(6,403)	(1,545)	62	24,636	-	-	(9,924)	40,396
Phase 2									
Loans and advances	**73,524**	**31,682**	**(5,195)**	**(67)**	**12,912**	**-**	**-**	**(27,698)**	**85,158**
Retail	**42,433**	**17,836**	**(3,800)**	**(5)**	**5,554**	**-**	**-**	**(12,920)**	**49,098**
Other loans	77	77	-	-	-	-	-	(67)	87
Mortgage loans	24,698	9,086	(1,838)	-	2,080	-	-	(6,105)	27,921
Credit cards	1,988	280	(145)	(5)	628	-	-	(812)	1,934
Consumer loans	12,452	6,467	(1,588)	-	1,839	-	-	(4,173)	14,997
Finance lease	3,218	1,926	(229)	-	1,007	-	-	(1,763)	4,159

20. Loans and advances to clients, (continued)

(c) Impairment losses on loans and advances to clients, (continued)

Loans and advances to customers during the year before impairment 2019, (continued)

Phase 2									
Corporate	**31,091**	**13,846**	**(1,395)**	**(62)**	**7,358**	**-**	**-**	**(14,778)**	**36,060**
Investment loans	9,641	5,436	(76)	-	304	-	-	(2,580)	12,725
Credit cards	30	9	-	-	10	-	-	(15)	34
Working capital loans	9,907	1,998	(496)	-	2,232	-	-	(6,220)	7,421
Finance lease	11,513	6,403	(823)	(62)	4,812	-	-	(5,963)	15,880
Phase 3									
Cash pool and factoring	**-**	**-**	**26**	**-**	**-**	**-**	**-**	**-**	**26**
Loans and advances	**69,200**	**-**	**11,886**	**-**	**5,944**	**-**	**(7,204)**	**(17,988)**	**61,838**
Retail	**46,804**	**-**	**8,288**	**-**	**2,820**	**-**	**(2,408)**	**(8,631)**	**46,873**
Other loans	71	-	9	-	-	-	(7)	(24)	49
Mortgage loans	36,093	-	4,547	-	993	-	(2,198)	(5,832)	33,603
Credit cards	624	-	226	-	271	-	(16)	(300)	805
Consumer loans	9,995	-	3,259	-	1,556	-	(187)	(2,394)	12,229
Finance lease	21	-	247	-	-	-	-	(81)	187
Phase 3									
Corporate	**22,396**	**-**	**3,598**	**-**	**3,124**	**-**	**(4,796)**	**(9,357)**	**14,965**
Investment loans	6,751	-	76	-	56	-	(345)	(4,174)	2,364
Credit cards	171	-	-	-	27	-	(3)	(57)	138
Working capital loans	14,906	-	1,154	-	2,187	-	(4,448)	(4,419)	9,380
Finance lease	568	-	2,368	-	854	-	-	(707)	3,083
Total	**1,432,035**	**-**	**-**	**-**	**507,796**	**-**	**(7,204)**	**(302,990)**	**1,629,637**

20. Loans and advances to clients, (continued)

(c) Impairment losses on loans and advances to clients, (continued)

Loans and advances to customers during the year before impairment 2019

	Initial Balance 01.01.2019	Changes due to migration from Phase 1 to Phase 2	Changes due to migration from Phase 1 and Phase 2 to Phase 3	Changes due to migration from Phase 2 and Phase 3 to Phase 1	Increases due to occurrence and acquisition	Changes due to updating the institution's valuation methodology	Decrease of the correction due to derecognition	Changes due to repayments	Balance at the end of the period
Phase 1									
Cash pool and factoring	203,277	-	-	-	20,422	-	-	-	223,699
Loans and advances	**1,017,545**	**(27,810)**	**(5,466)**	**21**	**371,652**	**-**	**-**	**(290,330)**	**1,065,612**
Retail	**517,558**	**(13,121)**	**(4,453)**	**21**	**233,788**	**-**	**-**	**(133,099)**	**600,694**
Other loans	1,448	(100)	-	-	597	-	-	(690)	1,255
Mortgage loans	331,356	(7,614)	(2,719)	-	135,801	-	-	(64,104)	392,720
Credit cards	8,273	(206)	(66)	17	2,834	-	-	(2,793)	8,059
Consumer loans	166,128	(4,605)	(1,668)	4	82,881	-	-	(61,006)	181,734
Finance lease	10,353	(596)	-	-	11,675	-	-	(4,506)	16,926
Corporate	**499,987**	**(14,689)**	**(1,013)**	**-**	**137,864**	**-**	**-**	**(157,231)**	**464,918**
Finance lease	26,570	(5,876)	(113)	-	22,616	-	-	(9,627)	33,570
Investment loans	204,502	(2,488)	(207)	-	59,941	-	-	(65,461)	196,287
Credit cards	340	(2)	(91)	-	131	-	-	(111)	267
Working capital loans	268,575	(6,323)	(602)	-	55,176	-	-	(82,032)	234,794
Phase 2									
Loans and advances	**68,957**	**27,810**	**(5,025)**	**(21)**	**12,998**	**-**	**-**	**(31,195)**	**73,524**
Retail	**39,992**	**13,121**	**(3,777)**	**(21)**	**6,200**	**-**	**-**	**(13,081)**	**42,434**
Other loans	25	100	-	-	-	-	-	(48)	77
Mortgage loans	22,921	7,614	(1,962)	-	2,031	-	-	(5,906)	24,698
Credit cards	2,534	206	(168)	(17)	393	-	-	(959)	1,989
Consumer loans	10,628	4,605	(1,619)	(4)	3,145	-	-	(4,303)	12,452
Finance lease	3,884	596	(28)	-	631	-	-	(1,865)	3,218

20. Loans and advances to clients, (continued)

(c) Impairment losses on loans and advances to clients, (continued)

Loans and advances to customers during the year before impairment 2018, (continued)

Phase 2									
Corporate	**28,965**	**14,689**	**(1,248)**	**-**	**6,798**	**-**	**-**	**(18,114)**	**31,090**
Investment loans	11,203	2,488	(847)	-	1,438	-	-	(4,641)	9,641
Credit cards	51	2	(13)	-	9	-	-	(19)	30
Working capital loans	10,119	6,323	(235)	-	1,892	-	-	(8,193)	9,906
Finance lease	7,592	5,876	(153)	-	3,459	-	-	(5,261)	11,513
Phase 3									
Loans and advances	**117,868**	**-**	**10,491**	**-**	**6,417**	**-**	**(41,271)**	**(24,305)**	**69,200**
Retail	**74,792**	**-**	**8,230**	**-**	**3,813**	**-**	**(26,099)**	**(13,932)**	**46,804**
Other loans	775	-	-	-	55	-	(727)	(32)	71
Mortgage loans	57,868	-	4,681	-	2,186	-	(17,744)	(10,899)	36,092
Credit cards	3,267	-	234	-	172	-	(2,779)	(269)	625
Consumer loans	12,873	-	3,287	-	1,398	-	(4,849)	(2,714)	9,995
Finance lease	9	-	28	-	2	-	-	(18)	21
Phase 3									
Corporate	**43,076**	**-**	**2,261**	**-**	**2,604**	**-**	**(15,172)**	**(10,373)**	**22,396**
Investment loans	16,474	-	1,054	-	28	-	(4,218)	(6,587)	6,751
Credit cards	983	-	104	-	28	-	(898)	(46)	171
Working capital loans	25,309	-	837	-	2,241	-	(10,047)	(3,434)	14,906
Finance lease	310	-	266	-	307	-	(9)	(306)	568
Total	**1,407,647**	**-**	**-**	**-**	**411,489**	**-**	**(41,271)**	**(345,830)**	**1,432,035**

20. Loans and advances to clients, (continued)

(c) Impairment losses on loans and advances to clients, (continued)

Impairment movement of Loans and advances to clients in 2019

	Initial Balance 01.01.2020	Changes due to migration from Phase 1 to Phase 2	Changes due to migration from Phase 1 and Phase 2 to Phase 3	Changes due to migration from Phase 2 and Phase 3 to Phase 1	Increases due to occurrence and acquisition	Changes due to updating the institution's valuation methodology	Decrease of the correction due to derecognition	Changes due to repayments	Balance at the end of the period
Phase 1									
Cash pool and factoring	**45**	**-**	**(26)**	**-**	**-**	**-**	**-**	**16**	**35**
Loans and advances	**11,697**	**(343)**	**(80)**	**1**	**19,636**	**-**	**-**	**(2,994)**	**27,917**
Retail	**5,204**	**(204)**	**(65)**	**-**	**4,205**	**-**	**-**	**(1,302)**	**7,838**
Other loans	7	-	-	-	-	-	-	(3)	4
Mortgage loans	2,643	(74)	(27)	-	3,035	-	-	(455)	5,122
Credit cards	71	(6)	(1)	-	64	-	-	(41)	87
Consumer loans	2,424	(118)	(37)	-	1,051	-	-	(770)	2,550
Finance lease	59	(6)	-	-	55	-	-	(33)	75
Corporate	**6,493**	**(139)**	**(15)**	**1**	**15,431**	**-**	**-**	**(1,692)**	**20,079**
Investment loans	2,634	(81)	-	-	8,581	-	-	(434)	10,700
Credit cards	17	-	-	-	2	-	-	(16)	3
Working capital loans	3,686	(25)	(10)	-	6,558	-	-	(1,175)	9,034
Finance lease	156	(33)	(5)	1	290	-	-	(67)	342
Phase 2									
Кредити и аванси	**4,617**	**343**	**(458)**	**(1)**	**5,204**	**-**	**-**	**(1,376)**	**8,329**
Retail	**3,476**	**204**	**(418)**	**-**	**2,937**	**-**	**-**	**(889)**	**5,310**
Other loans	1	-	-	-	74	-	-	-	75
Mortgage loans	2,369	74	(218)	-	1,553	-	-	(482)	3,296
Credit cards	98	6	(16)	-	128	-	-	(63)	153
Consumer loans	972	118	(182)	-	1,061	-	-	(321)	1,648
Finance lease	36	6	(2)	-	121	-	-	(23)	138

20. Loans and advances to clients, (continued)

(c) Impairment losses on loans and advances to clients, (continued)

Impairment movement of Loans and advances to clients in 2019, (continued)

	Initial Balance 01.01.2020	Changes due to migration from Phase 1 to Phase 2	Changes due to migration from Phase 1 and Phase 2 to Phase 3	Changes due to migration from Phase 2 and Phase 3 to Phase 1	Increases due to occurrence and acquisition	Changes due to updating the institution's valuation methodology	Decrease of the correction due to derecognition	Changes due to repayments	Balance at the end of the period
Phase 2									
Corporate	**1,141**	**139**	**(40)**	**(1)**	**2,267**	**-**	**-**	**(487)**	**3,019**
Investment loans	547	81	(4)	-	897	-	-	(196)	1,325
Credit cards	4	-	-	-	4	-	-	(2)	6
Working capital loans	424	25	(25)	-	567	-	-	(186)	805
Finance lease	166	33	(11)	(1)	799	-	-	(103)	883
Phase 3									
Cash pool and factoring	**-**	**-**	**26**	**-**	**-**	**-**	**-**	**-**	**26**
Кредити и аванси	**48,167**	**-**	**538**	**-**	**15,382**	**-**	**(7,204)**	**(11,219)**	**45,664**
Retail	**30,760**	**-**	**483**	**-**	**9,484**	**-**	**(2,408)**	**(5,508)**	**32,811**
Other loans	69	-	-	-	7	-	(7)	(20)	49
Mortgage loans	20,773	-	245	-	4,535	-	(2,198)	(3,284)	20,071
Credit cards	607	-	17	-	417	-	(16)	(252)	773
Consumer loans	9,290	-	219	-	4,348	-	(187)	(1,939)	11,731
Finance lease	21	-	2	-	177	-	-	(13)	187
Corporate	**17,407**	**-**	**55**	**-**	**5,898**	**-**	**(4,796)**	**(5,711)**	**12,853**
Investment loans	3,098	-	4	-	194	-	(345)	(1,369)	1,582
Credit cards	128	-	-	-	27	-	(3)	(48)	104
Working capital loans	13,610	-	35	-	2,856	-	(4,448)	(3,969)	8,084
Finance lease	571	-	16	-	2,821	-	-	(325)	3,083
Total	**64,526**	**-**	**-**	**-**	**40,222**	**-**	**(7,204)**	**(15,573)**	**81,971**

20. Loans and advances to clients, (continued)

(c) Impairment losses on loans and advances to clients, (continued)

Impairment movement of Loans and advances to clients in 2018

	Initial Balance 01.01.2019	Changes due to migration from Phase 1 to Phase 2	Changes due to migration from Phase 1 and Phase 2 to Phase 3	Changes due to migration from Phase 2 and Phase 3 to Phase 1	Increases due to occurrence and acquisition	Changes due to updating the institution's valuation methodology	Decrease of the correction due to derecognition	Changes due to repayments	Balance at the end of the period
Phase 1									
Cash pool and factoring	**35**	-	-	-	**10**	-	-	-	**45**
Loans and advances	**11,261**	**(267)**	**(83)**	**2**	**4,781**	-	-	**(3,997)**	**11,697**
Retail	**4,228**	**(116)**	**(59)**	**2**	**2,367**	-	-	**(1,218)**	**5,204**
Other loans	5	-	-	-	4	-	-	(2)	7
Mortgage loans	2,256	(58)	(31)	-	1,071	-	-	(595)	2,643
Credit cards	47	(5)	-	2	46	-	-	(19)	71
Consumer loans	1,906	(52)	(28)	-	1,192	-	-	(594)	2,424
Finance lease	14	(1)	-	-	54	-	-	(8)	59
Corporate	**7,033**	**(151)**	**(24)**	-	**2,414**	-	-	**(2,779)**	**6,493**
Investment loans	2,679	(26)	(1)	-	1,117	-	-	(1,135)	2,634
Credit cards	14	-	(1)	-	12	-	-	(8)	17
Working capital loans	4,227	(111)	(22)	-	1,154	-	-	(1,562)	3,686
Finance lease	113	(14)	-	-	131	-	-	(74)	156
Phase 2									
Кредити и аванси	**4,702**	**267**	**(535)**	**(2)**	**1,885**	-	-	**(1,700)**	**4,617**
Retail	**3,692**	**116**	**(482)**	**(2)**	**1,400**	-	-	**(1,248)**	**3,476**
Other loans	1	-	-	-	-	-	-	-	1
Mortgage loans	2,578	58	(282)	-	861	-	-	(846)	2,369
Credit cards	163	5	(18)	(2)	56	-	-	(106)	98
Consumer loans	915	52	(182)	-	462	-	-	(275)	972
Finance lease	35	1	-	-	21	-	-	(21)	36

20. Loans and advances to clients, (continued)

(c) Impairment losses on loans and advances to clients, (continued)

Impairment movement of Loans and advances to clients in 2018, (continued)

	Initial Balance 01.01.2019	Changes due to migration from Phase 1 to Phase 2	Changes due to migration from Phase 1 and Phase 2 to Phase 3	Changes due to migration from Phase 2 and Phase 3 to Phase 1	Increases due to occurrence and acquisition	Changes due to updating the institution's valuation methodology	Decrease of the correction due to derecognition	Changes due to repayments	Balance at the end of the period
Phase 2									
Corporate	**1,010**	**151**	**(53)**	**-**	**485**	**-**	**-**	**(452)**	**1,141**
Investment loans	634	26	(44)	-	171	-	-	(240)	547
Credit cards	5	-	(1)	-	1	-	-	(1)	4
Working capital loans	263	111	(5)	-	194	-	-	(139)	424
Finance lease	108	14	(3)	-	119	-	-	(72)	166
Phase 3									
Кредити и аванси	**88,049**	**-**	**618**	**-**	**17,202**	**-**	**(41,220)**	**(16,482)**	**48,167**
Retail	**52,619**	**-**	**541**	**-**	**13,096**	**-**	**(26,065)**	**(9,431)**	**30,760**
Other loans	775	-	-	-	54	-	(727)	(33)	69
Mortgage loans	36,226	-	313	-	9,025	-	(17,744)	(7,047)	20,773
Credit cards	3,246	-	18	-	340	-	(2,780)	(217)	607
Consumer loans	12,363	-	210	-	3,656	-	(4,814)	(2,125)	9,290
Finance lease	9	-	-	-	21	-	-	(9)	21
Corporate	**35,430**	**-**	**77**	**-**	**4,106**	**-**	**(15,155)**	**(7,051)**	**17,407**
Investment loans	9,538	-	45	-	1,445	-	(4,218)	(3,712)	3,098
Credit cards	983	-	2	-	82	-	(898)	(41)	128
Working capital loans	24,600	-	26	-	2,130	-	(10,030)	(3,116)	13,610
Finance lease	309	-	4	-	449	-	(9)	(182)	571
Total	**104,047**	**-**	**-**	**-**	**23,878**	**-**	**(41,220)**	**(22,179)**	**64,526**

21. Property, plant and equipment

In BGN thousand	Lands and buildings	Plant and equipment	Fixtures and fittings	Motor vehicles	Expenditure on acquisition of tangible fixed assets	Total
Carrying amount						
As at 1 January 2019	7,587	14,240	7,072	824	405	30,128
Additions	-	869	291	-	1,324	2,484
Discontinued	-	(678)	(521)	(84)	(1,401)	(2,684)
As at 31 December 2019	**7,587**	**14,431**	**6,842**	**740**	**328**	**29,928**
As at 1 January 2020	7,587	14,431	6,842	740	328	29,928
Additions	476	404	307	-	2,633	3,820
Discontinued	(764)	(2,449)	(438)	-	(1,239)	(4,890)
As at 31 December 2020	**7,299**	**12,386**	**6,711**	**740**	**1,722**	**28,858**
Depreciation						
As at 1 January 2019	(3,710)	(12,650)	(6,332)	(824)	-	(23,516)
Depreciation costs for the year	(245)	(751)	(199)	-	-	(1,195)
Depreciation of out of use	-	594	504	84	-	1,182
As at 31 December 2019	**(3,955)**	**(12,807)**	**(6,027)**	**(740)**	**-**	**(23,529)**
As at 1 January 2020	(3,955)	(12,807)	(6,027)	(740)	-	(23,529)
Depreciation costs for the year	(241)	(646)	(164)	-	-	(1,051)
Depreciation of out of use	438	2,445	426	-	-	3,309
As at 31 December 2020	**(3,758)**	**(11,008)**	**(5,765)**	**(740)**	**-**	**(21,271)**
Carrying amount						
31 December 2019	**3,632**	**1,624**	**815**	**-**	**328**	**6,399**
31 December 2020	**3,541**	**1,378**	**946**	**-**	**1,722**	**7,587**

22. Right of use assets

Right-of-use assets (by class of assets)

In BGN thousand	31 December 2020	31 December 2019
Buildings	8,246	7,444
Vehicles	194	331
IT equipment	98	114
At the end of the period	**8,538**	**7,889**

22. Right of use assets, (continued)

Right-of-use assets (by class of assets), (continued)

In BGN thousand	Buildings	Vehicles	IT equipment	**Total**
Cost:				
As at 1 January 2019	11,294	401	147	11,842
Additions – new lease contracts	502	78	48	628
Termibation of lease contracts	(1,311)	(36)	-	(1,347)
As at 31 December 2019	**10,485**	**443**	**195**	**11,123**
Depreciation:				
As at 1 January 2019	-	-	-	-
Depreciation for the year	(3,041)	(112)	(81)	(3,234)
As at 31 December 2019	(3,041)	(112)	(81)	(3,234)
Net Book Value as at 1 January 2019	**11,294**	**401**	**147**	**11,842**
Net Book Value as at 31 December 2019	**7,444**	**331**	**114**	**7,889**

In BGN thousand	Buildings	Vehicles	IT equipment	**Total**
Cost:				
As at 1 January 2020	10,485	443	195	11,123
Additions – new lease contracts	5,643	-	79	5,722
Termibation of lease contracts	(2,149)	(59)	-	(2,208)
As at 31 December 2020	**13,979**	**384**	**274**	**14,637**
Depreciation:				
As at 1 January 2020	(3,041)	(112)	(81)	(3,234)
Depreciation for the year	(3,261)	(93)	(95)	(3,449)
As at 31 December 2020	569	15	-	584
Net Book Value as at 1 January 2020	(5,733)	(190)	(176)	(6,099)
Net Book Value as at 31 December 2020	**7,444**	**331**	**114**	**7,889**

The following amounts are recognised in profit or loss:

Depreciation of Right of use assets (by class of assets)

In BGN thousand	**2020**	**2019**
Buildings	3,261	3,041
Vehicles	93	112
IT equipment	95	81
Total depreciation charge	**3,449**	**3,234**
Interest expense on lease liabilities (included in finance cost)	42	180
Expense relating to short-term leases (included in administrative expenses)	124	157
Loss on termination of lease contract	(75)	(6)
Total expenses related to leases	**91**	**331**

22. Right of use assets, (continued)

Right-of-use assets (by class of assets), (continued)

The following amounts are recognised in the cash flow statement:

In BGN thousand	**2020**	**2019**
Cash outflow for IFRS 16 leases – financing activity		
Principal	3,493	3,620
Interest	42	180
	3,535	**3,800**
Cash outflow for leases – operating activity	133	172
Total cash outflows	**3,668**	**3,972**

23. Intangible assets

	Intangible assets	**Expenditure on acquisition of intangible assets**	**Total**
In BGN thousand			
Carrying amount			
As at 1 January 2019	**18,626**	**765**	**19,391**
Additions	1,225	1,747	2,972
Discontinued	(1,888)	(986)	(2,874)
As at 31 December 2019	**17,963**	**1,526**	**19,489**
As at 1 January 2020	**17,963**	**1,526**	**19,489**
Additions	1,329	2,470	3,799
Discontinued	(1,649)	(1,289)	(2,938)
Impairment	(344)	-	-
As at 31 December 2020	**17,299**	**2,707**	**20,006**
Depreciation			
As at 31.12.2019	**(13,183)**	**-**	**(13,183)**
Depreciation costs for the year	(944)	-	(944)
Depreciation of scrap during the year	1,279	-	1,279
As at 31 December 2019	**(12,848)**	**-**	(12,848)
		-	
As at 1 January 2020	**(12,848)**	**-**	**(12,848)**
Depreciation costs for the year	(819)	-	(819)
Depreciation of scrap during the year	1,291	-	1,291
As at 31 December 2020	**(12,376)**	**-**	**(12,376)**
Carrying amount			
31 December 2019	**5,115**	**1,526**	**6,641**
31 December 2020	**4,923**	**2,707**	**7,630**

In 2020, the impairment of intangible assets is on obsolete software applications and software, which are replaced in connection with the active process of digitalization in the Bank.

24. Other financial assets

In BGN thousand	**2020**	**2019**
Transfers for execution	512	5,511
Total other assets	**512**	**5,511**

25. Other assets

In BGN thousand	**2020**	**2019**
Expenses for future periods	4,646	3,794
Materials in stock	1,139	417
Receivables from customers	715	510
Reeivables for fees and commissions	330	519
Other assets	1,366	1,277
Total other assets	**8,196**	**6,517**

26. Deposits from clients

In BGN thousand	**2020**	**2019**
Individuals		
Current accounts	916,126	745,053
Deposits	699,196	694,672
Total	**1,615,322**	**1,439,725**
Private enterprises		
Current accounts	1,184,980	997,940
Deposits	158,715	130,952
Total	**1,343,695**	**1,128,892**
State-owned enterprises		
Current accounts	24,656	18,643
Deposits	208	207
Total	**24,864**	**18,850**
Total client deposits	**2,983,881**	**2,587,467**

27. Other borrowed funds

In BGN thousand	**2020**	**2019**
Payable to the European Investment Fund under the JEREMIE Initiative	4,956	7,021
Payable to the European Investment Bank on a credit line received	27,940	31,466
Received from credit institutions	216	135
Total other borrowed funds	**33,112**	**38,622**

27. Other borrowed funds, (continued)

As at 31 December 2020, the borrowed funds payable to banks on received credit lines included funds for lending to small and medium-sized enterprises received by the European Investment Bank at the amount of BGN 27,940 thousand (2019 - 31,466 thousand).

The Bank has concluded a contract with the European Investment Fund (JEREMIE), which is part of the Operational Program "Development of the Competitiveness of the Bulgarian Economy 2007-2013", providing a resource for the support of small and medium-sized enterprises, with the provided resources amounting to BGN 4,956 thousand (2019 - 7,021 thousand).

28. Lease liabilities

In BGN thousand	**31 December 2020**	**31 December 2019**
Short term lease liabilities	2,651	2,449
Long term lease liabilities	5,780	5,427
Total lease liabilities	**8,431**	**7,876**

31 December 2020

In BGN thousand	**Minimum lease payments**	**Present value of lease payments**
Up to 1 year	2,693	2,651
Between 1 and 5 years	4,826	4,712
Over 5 yeras	1,081	1,068
Total minimum lease payments	**8,600**	**8,431**
Reduced by the amounts representing financial costs	(169)	
Present value of minimum lease payments	**8,431**	

31 December 2019

In BGN thousand	**Minimum lease payments**	**Present value of lease payments**
Up to 1 year	2,588	2,449
Between 1 and 5 years	5,019	4,819
Over 5 yeras	621	608
Total minimum lease payments	**8,228**	**7,876**
Reduced by the amounts representing financial costs	(352)	
Present value of minimum lease payments	**7,876**	

28. Lease liabilities, (continued)

The tables below present the movement of leasing liabilities for the specific period:

In BGN thousand	**Lease liabilities**
As at 1 January 2020	**(7,876)**
Principal payments under lease agreements	3,493
Accrued and paid interest under lease agreements	42
Total cash outflows from lease agreements	**3,535**
New lease agreements	(5,825)
Terminated lease agreements	1,735
As at 31 December 2020	**(8,431)**

In BGN thousand	**Lease liabilities**
As at 1 January 2019	**(11,842)**
Principal payments under lease agreements	3,620
Accrued and paid interest under lease agreements	180
Total cash outflows from lease agreements	**3,800**
New lease agreements	(627)
Terminated lease agreements	793
As at 31 December 2019	**(7,876)**

29. Deferred taxes

Deferred income taxes are calculated on all temporary differences using the balance sheet liability method by applying a 2020 tax rate of 10% (2019: 10%).

The deferred income tax expense is attributable to the following balance sheet items:

In BGN thousand	**Assets**		**Liabilities**		**Net (assets)/ liabilities**	
	2020	**2019**	**2020**	**2019**	**2020**	**2019**
Property, plant and equipment	-	-	454	357	454	357
Other liabilities	(309)	(220)	-	-	(309)	(220)
Net tax (assets)/ liabilities	**(309)**	**(220)**	**454**	**357**	**145**	**137**

The movement of temporary tax differences during the year arises from:

In BGN thousand	**Balance 2019**	**In profit and loss**	**Balance 2020**
Property, plant and equipment	357	97	454
Other liabilities	(220)	(89)	(309)
Net deferred tax (assets)/ liabilities	**137**	**8**	**145**

In BGN thousand	**Balance 2018**	**In profit and loss**	**Balance 2019**
Property, plant and equipment	272	85	357
Other liabilities	(173)	(47)	(220)
Net deferred tax (assets)/ liabilities	**99**	**38**	**137**

30. Other financial liabilities

In BGN thousand	**2020**	**2019**
Transfers for execution	2,607	7,583
Total other assets	**2,607**	**7,583**

31. Other liabilities

In BGN thousand	**2019**	**2018**
Payables to personnel	1,460	1,179
Payables under defined benefit plans	394	400
Tax and social security obligations	405	397
Payables to suppliers	1,112	804
Other payables	1,431	1,120
Total other liabilities	**4,802**	**3,900**

32. Payables under defined benefit pension plans

The Bank has the obligation to pay to those of its resigning employees who retire in compliance with the requirements of Article 222, § 3 of the Labor Code (LC) in Bulgaria. By virtue of these provisions of the LC, upon termination of the labor contracts with employees who have acquired the right to retire, their employer pays a compensation at the amount of two gross salaries. Provided the employee has completed 10 and more years of service at retirement, the compensation is at the amount of 6 gross salaries.

The approximate amount of payables for defined benefit plans ar retirement as of every accounting period and the expenses recognized in profit and losses are based on actuarial reports (the information about the parameters and assumptions used is disclosed below).

The defined benefit plan (liability for retirement income) is unfunded.

Movements in the present value of payments under defined benefit plans

In BGN thousand	**2020**	**2019**
The present value of payables at 1 January	**400**	**367**
Expenses for hired services	45	57
Interest expenses	1	2
Amounts paid during the period	(78)	(90)
Actuarial (gains) / losses from changes in demographic and financial assumptions	26	64
The present value of the payable at 31 December	**394**	**400**

Actuarial assumptions

The main actuarial assumptions at the reporting date (presented as averages) are presented as follows:

	2020	**2019**
Discount percentage at 31 December	0.26373%	0.4506%
Gross wage growth	3.00%	3.00%

33. Capital and reserves

(a) Fixed capital

As at 31 December 2020, Allianz Bank Bulgaria's registered capital amounted to BGN 69,000 thousand. (2019 - BGN 69,000 thousand), which includes registered capital amounting to BGN 69,000 thousand. The registered capital of the Bank is fully paid and consists of 69,000,000 registered shares with voting rights, each with a nominal value of 1 BGN.

The share capital structure as at 31 December 2020 and 31 December 2019 is as follows:

Shareholders	**2020** *% holding:*	**2019** *% holding*
Allianz Bulgaria Holding	99.891	99.891
Other	0.109	0.109
	100.000	100.000

Ultimate owner, who exercise ultimate effective control is Allianz SE.

33. Capital and reserves, (continued)

b) Retained earnings

As at December 31, 2020, the balance of retained earnings amounted to BGN 156,301 thousand (2019: BGN 148,086 thousand) and includes past profit of BGN 148,086 thousand (2019: BGN 115,099 thousand) and profit for the year amounting to BGN 8,241 thousand (2019: BGN 33,051 thousand) and loss from defined benefit plans in the amount of 26 thousand (2019: BGN 64 thousand).

(c) Statutory reserves

Legal reserves are created in accordance with local law requirements. Under the Commerce Act, the Bank should set aside from its profit statutory reserves until it reaches 10% of its capital. At 31 December 2020 the statutory reserves amount to BGN 9.850 thousand. (2019 - BGN 9.850 thousand)

(d) Fair value reserve

The fair value reserve includes the cumulative net change in the fair value of financial assets at fair value through other comprehensice income until the investments are derecognized or impaired. At 31 December 2020 the statutory reserves amount to BGN 9,599 thousand (2019 - BGN 8,599 thousand)

(e) The capital base

The Bank applies a standardized approach with regard to credit and market risk, and a basic indicator approach for operating risk. The Bank monitors changes in major exposure classes, capital base, and total capital adequacy on a monthly basis, and reports the levels of regulatory and internal capital to the Management and Supervisory Board, and prepares quarterly reports, which it presents to the BNB within the timeframe set out in Regulation 680/2014. According to art. 92 of Regulation 575 of the European parliament and of the Council of 26 June 2013, minimum requirements for the ratios of capital adequacy of Tier 1 capital and of Total capital adequacy are respectively no less than 6% and no less than 8%.

At the end of 2020, Allianz Bank Bulgaria AD complied with the recommendations of BNB (decision of the BNB MB of 20.12.2019 and 160/24.04.2019) for capital stability – that total capital adequacy should be no less than 14.25%, formed based on:

- Minimal capital adequacy ratio requirement for 8% of risk weighted assets in accordance of art. 92 §1 of Regulation 575/2013 and additional requirement for base share capital 0.25% of risk weighted assets, or 8.25% total capital requirement, according to The Supervisory Review and Evaluation Process (SREP; EBA/GL/2014/13).
- systemic risk buffer of 3% of risk weighted assets,
- safety capital buffer of 2.5% of risk weighted assets,
- countercyclical capital buffer of 0.5%, applicable for credit risk exposures in Bulgaria as of end of 2020, according to BNB decision related to COVID-19 crisis.

The capital adequacy ratio is 18.60% / with a required minimum of 14.25% ./ and a tier 1 capital adequacy ratio of 18.60%. As of December 31, 2020 the Bank does not report tier 2 capital in the form of subordinated term debt in its capital base.

33. Capital and reserves, (continued)

In BGN thousand	**Equity/ Capital base 2020**	**Equity/ Capital base 2019**
Registered and paid-in capital	69,000	69,000
Retained earnings from past year	148,060	115,035
Other reserves	9,850	9,850
Accumulated other comprehensive income	9,411	8,413
Total capital and reserves	**236,321**	**202,298**
Reductions		
Intangible assets	(4,923)	(5,114)
Other Transitional Adjustments	(4,915)	(512)
Total capital reductions *	(9,838)	(5,626)
Tier 1 capital	226,483	196,672
Tier 2 capital	-	-
Total equity/ Capital base	**226,483**	**196,672**

*the capital reductions ate based on corrections for specific credit risk in the regulatory capital (Regulations 183/2014 and 241/2014), and the prudential assessment of assets and liabilities assessed at fair value, introduced at the end of 2018 (Regulation 680/2014 of the EU, via Delegated regulation of the EU 2016/101).

Capital requirements and ratios

As of December 31, 2020, the Bank meets the supervisory requirements as follows:

In BGN thousand	**Capital requirements and ratios**
Risk exposures for credit risk, counterparty credit risk, risk of dispersion, and free supplies in TBGN	
Central governments and central banks	8,663
Regional governments or local authorities	1,279
Institutions	70,764
Companies	388,980
Retail exposures	332,999
Exposures secured by real estate	159,254
Non-performing exposures	16,294
Capital Exposures	7,359
Other positions	63,813
Total risk exposures for credit risk, counterparty credit risk, risk of dispersion, and free supplies in TBGN	**1,049,405**
Risk exposures for position, currency, and commodity risk	**-**
Risk exposures for operating risk	**167,088**
Total risk exposures in TBGN	**1,216,493**
Total Capital adequacy ratio (%)	18,60%
Tier 1 capital adequacy ratio (%)	18,60%
Surplus (+) /deficit (-) of regulatory capital before buffers	128,942
Safeguard capital buffer / 2.5% of total risk assets /	30,412
Systemic risk buffer (3% of total risk assets)	36,495
Specific countercyclical capital buffer for the institution	5,839
Capiatl requirements, according to Tier 2 corrections	3,041
Available capital after deducting buffers	**53,155**

33. Capital and reserves, (continued)

The described indicators demonstrate the Bank's main aim – maintaining optimum capital adequacy, i.e., optimum capital adequacy of bank risks to achieve its strategic aims, while complying with individual bank regulations.

34. Off-balance sheet commitments

Bank guarantees and letters of credit

The Bank provides bank guarantees and letters of credit in order to guarantee the execution of commitments of its clients to third parties. These agreements have fixed limits and usually have a validity period of up to two years.

Amounts under agreements to issue guarantees and letters of credit are shown in the table below according to the relevant category. It is considered that the values reflected in the commitment table are fully translated. Amounts reflected in the table as guarantees and letters of credit represent the maximum amount of accounting loss that will be reflected in the statement of financial position in the event that counterparties fail to meet their obligations.

In BGN thousand	**2020**	**2019**
Uunutilized credit commitments:	120,076	126,293
Letters of credit	2,374	2,495
Guarantees	47,098	41,282
Impairment losses	(2,881)	(3,042)
Total off-balance sheet commitments	**166,667**	**167,028**

These commitments and contingent liabilities only bear off-balance-sheet credit risk, with only engagement fees and deductions for eventual losses being recognized in the statement of financial position until the engagement expires or is executed. Many of the contingent liabilities are expected to close without incurring partial and full payments. Therefore, the amounts do not represent future cash flows.

35. Assets provided as collateral

As at 31 December 2020, the Bank has pledged government securities with a nominal value of BGN 33,154 thousand. (2019: BGN 43,143 thousand) and market value BGN 34,900 thousand (2019: BGN 45,756 thousand) as collateral for attracted funds from the State Budget, Government Securities with a nominal value of BGN 44,947 thousand (2019: BGN 45,053 thousand) and market value BGN 49,721thousand. (2019 BGN 51,083 thousand) as collateral for loans from the European Investment Bank under a program for targeted refinancing of commercial banks and a program for providing a targeted credit line for financing of agricultural producers.

36. Trust asset management

The Bank offers asset management trust services to Allianz Bulgaria Holding Group companies by holding and managing government securities on behalf of the Bank. For these services, the Bank receives revenue from fees. The trust assets are not assets of the Bank and are not reflected in the Bank's statement of financial position. The Bank is not exposed to credit risk related to the management of these assets because it does not guarantee them.

Fees and commissions from trust management of Allianz Bulgaria Securities are BGN 281 thousand for 2020 (2019: BGN 252 thousand)

37. Deals with related parties

(a) Parent and ultimate controlling entity

Identification of related parties
The Bank deems that it is a related party in accordance with the definitions contained in International Accounting Standard 24 "Related Party Disclosures" (IAS 24) with:

- The parent company, Allianz Bulgaria Holding AD, from which 66.16% are controlled by Allianz SE (ultimate controlling party) and group companies of Allianz CE;
- An investor with significant influence, holding directly or indirectly (with/or immediate family) 33.84% of the capital of Allianz Bulgaria Holding AD, companies and non-profit entities under its direct or indirect control;
- Key management personnel and companies and legal persons on non purpose under their direct and indirect control.

The table below shows the remuneration of key management personnel:

Remuneration of key management personnel		
In BGN thousand	**2020**	**2019**
Short-term earnings	1,007	1,538
Total	**1,007**	**1,538**

The related party transactions are described below.

Banking service

The Bank opens and keeps current accounts of related parties, accepts deposits from them, accrues interest charges, grants them loans from which it receives interest income. The Bank also receives income from fees and commissions from bank services provided to related parties.

Leases

The Bank acquires a financial lease from a related party. The value of the acquired lease receivables during the period amounted to BGN 44,706 thousand. (2019: BGN 42,424 thousand) The Bank provides credit risk management services to the related party and the risk to the lessee of the related party.

37. Deals with related persons, (continued)

Other financial services

The Bank receives income from fees and commissions from the sale of insurance and retirement benefits at the expense of related parties, which presents in the financial statements other operating income.

Other related party transactions include income and expense from / rents from leased or leased premises in own buildings, staff training costs, and insurance costs related to the Bank's operations.

(b) Transactions and balances

Related parties	Reason for relationship	Type of transaction	Value of transactions for the year ended		Final balances as at 31 December	
In BGN thousand			**2020**	**2019**	**2020**	**2019**
Allianz Bulgaria Holding AD	Controls directly or indirectly the Bank's activities	Current accounts	-	-	2,192	2,973
		Deposits	-	-	9,001	3,000
		Accrued interest on deposits	1	-	-	-
		Interest expenses	18	32	-	-
		Dividend paid	-	19,978	-	-
		Revenue from fees and commissions	2	2	-	-
ZAD Allianz Bulgaria AD	Company under common control	Current accounts	-	-	28,745	44,756
		Interest expenses	258	226	-	-
		Revenue from fees and commissions	289	248	-	-
		Insurance expenses	827	603	-	-
		Rental costs	387	392	-	-
		Other income	238	150	-	-
		Other expenses	64	96	-	-
		Guarantees	-	-	1,173	1,173
ZAD Energia AD	Company under common control	Current accounts	-	-	7,938	10,020
		Deposits	-	-	1,210	1,210
		Interest expenses	41	10	-	-
		Revenue from fees and commissions	21	42	-	-
		Rental costs	-	5	-	-
		Guarantees	-	-	1,173	1,173

37. Deals with related persons, (continued)

(b) Transactions and balances, (continued)

Related parties	Reason for relationship	Type of transaction	Value of transactions for the year ended		Final balances as at 31 December	
In BGN thousand			**2020**	**2019**	**2020**	**2019**
ZAD Allianz Bulgaria Life AD	Company under common control	Current accounts	-	-	8,569	6,927
		Interest expenses	58	30	-	-
		Revenue from fees and commissions	295	291	-	-
		Other income	453	429	-	-
		Rental costs	194	287	-	-
		Insurance expenses	1,772	1,587		-
		Obligation on invoices	-	-	-	2
PIC Allianz Bulgaria AD	Company under common control	Current accounts	-	-	9,710	19,747
		Deposits	-	-	6	6
		Interest expenses	67	113	-	-
		Revenue from fees and commissions	19	22	-	-
		Other income	227	259	-	-
		Rental costs	11	11	-	-
		Guarantees	-	-	5	5
Allianz Leasing Bulgaria AD	Company under common control	Current accounts	-	-	16	3,281
		Deposits	-	-	-	1
		Commercial credit	-	-	21,025	17,602
		Income from interest	199	286	-	-
		Interest expenses	2	-	-	-
		Revenue from fees and commissions	21	9	-	-
		Rental costs	110	102	-	-
		Costs for a transfer of receivables contract	53	80	-	-
		Revenue from a transfer of receivables contract	53	80	-	-
		Cession cost	1,668	1,304	-	-
		Transferred receivables	44,706	42,424	-	-
		Other income	2	6	-	-

37. Deals with related persons, (continued)

(b) Transactions and balances, (continued)

Related parties	**Reason for relationship**	**Type of transaction**	**Value of transactions for the year ended**		**Final balances as at 31 December**	
In BGN thousand			**2020**	**2019**	**2020**	**2019**
Allianz SE	Ultimate Controlling Owner	Receivables under cash pool	-	-	205,473	185,406
		Interest expenses	-	284	-	-
		Income from interest	509	-	-	-
		Marketing expenses	180	182	-	-
		Expenses related to staff management	207	127	-	-
		IT expenses	76	13	-	-
Shareholders and related parties	Companies under the control and joint control of an investor with significant influence and members of his family					
		Current accounts	-	-	8,377	8,213
		Deposits	-	-	18,472	17,470
		Interest payable on deposits	1	2	1	-
		Interest receivable	-	-	12	28
		Interest expenses	2	39	-	-
		Income from interest	140	316	-	-
		Revenue from fees and commissions	58	70	-	-
		Credits and credit commitments	-	-	4,953	7,239
		Impairment losses	-	-	27	38
		Guarantees	-	-	-	12
		Expenses related to staff management	37	18	-	-
		IT expenses	1,171	1,370	-	-
		Rental costs	674	791	-	-
		Rental receivables	-	-	-	66

As at 31 December 2020, loans and credit commitments had a residual maturity of between 3 months and 3 years. The interest rate varies between 1.65% and 4.50%. Loans and credit commitments are fully secured. Current accounts are not blocked and allow for free payments.

37. Deals with related persons, (continued)

(b) Transactions and balances, (continued)

Key management personnel	**Value of transactions for the year ended**		**Final balances as at 31 December**	
In BGN thousand	**2020**	**2019**	**2020**	**2019**
Current accounts	-	-	1,730	1,003
Deposits	-	-	2	564
Interest expenses	1	3	-	-
Income from interest	19	13	-	-
Revenue from fees and commissions	2	2	-	-
Remuneration	1,007	1,538	-	-
Credits and credit commitments	-	-	681	473
Impairment losses	-	-	6	3
Guarantees under Art. 240, para. 1 of the Commercial Code	-	-	14	14

As of December 31, 2020, loans and loan commitments to key management personnel have a residual maturity of less than one year and up to twenty five years, respectively. The interest rate varies between 2.25% and 3.50%. Loans and credit commitments are fully secured. Deposits and current accounts are not blocked and payments are made freely. Deposits have a residual maturity of up to three years. The interest rate on deposits is 0.15%.

38. Commitments under operating leases

The Bank has entered into contracts for the operating lease of buildings, cars and equipment. Contracts are of different duration, depending on the needs of the Bank.

In 2020, the amount of BGN 124 thousand was recognized as an expense in profit and loss in respect of operating leases (2019: BGN 157 thousand)

Irrevocable lease payments for operating lease are due as follows

In BGN thousand	**2020**	**2019**
Less than one year	171	165
	171	**165**

Irrevocable operating lease payments are commitments under short-term leases for leases of parking spaces and ATMs, IT equipment and others, which are an exception within the meaning of IFRS 16 - Leases.

39. Capital commitments

The contractual commitments for acquiring property, plant and equipment amounted to BGN 3,168 thousand (2019: BGN 554 thousand).

40. Events that occurred after the date of preparation of the financial statements

There are no significant events occurring after the date of preparation of the statement of financial position that would require additional disclosures or adjustments to the financial statements.

Independent Auditors’ Report

To the Shareholders of Allianz Bank Bulgaria AD

Report on the audit of the financial statements

Our opinion

We have audited the financial statements of Allianz Bank Bulgaria AD (the “Bank”) which comprise the statement of financial position as at 31 December 2020, and the statement of profit or loss, the statement of comprehensive income, the statement of changes in equity and the statement of cash flows for the year then ended, and the notes to the financial statements, which include significant accounting policies and other explanatory information.

In our opinion, the financial statements present fairly, in all material respects, the financial position of Allianz Bank Bulgaria AD as at 31 December 2020, and the Bank’s financial performance and cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union (EU).

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditors’ responsibilities for the audit of the financial statements section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence

We are independent of the Bank in accordance with the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code) and the ethical requirements of the Independent Financial Audit Act that are relevant to our audit of the financial statements in Bulgaria. We have fulfilled our other ethical responsibilities in accordance with the IESBA Code and the ethical requirements of the Independent Financial Audit Act.

PricewaterhouseCoopers Audit OOD, 9-11 Maria Louisa Blvd., 1000 Sofia, Bulgaria
T: +359 2 9355200, F: +359 2 9355266, www.pwc.com/bg

Registered with the Sofia City Court under company file number 13424/1997.

Our audit approach

Overview

Materiality	Overall Bank materiality: BGN 1,434 thousand which represents 5% of the average profit before tax for 2016, 2017, 2018, 2019 and 2020.
Key audit matters	Estimation uncertainty with respect to the impairment allowance for loans and advances to customers.

As part of designing our audit, we determined materiality and assessed the risks of material misstatement in the financial statements. In particular, we considered where management made subjective judgements; for example, in respect of significant accounting estimates that involved making assumptions and considering future events that are inherently uncertain. As in all of our audits, we also addressed the risk of management override of internal controls, including among other matters consideration of whether there was evidence of bias that represented a risk of material misstatement due to fraud.

We tailored the scope of our audit in order to perform sufficient work to enable us to provide an opinion on the financial statements as a whole, taking into account the structure of the Bank, the accounting processes and controls, and the industry in which the Bank operates.

Materiality

The scope of our audit was influenced by our application of materiality. An audit is designed to obtain reasonable assurance whether the financial statements are free from material misstatement. Misstatements may arise due to fraud or error. They are considered material if individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

Based on our professional judgement, we determined certain quantitative thresholds for materiality, including the overall Bank materiality for the financial statements as a whole as set out in the table below. These, together with qualitative considerations, helped us to determine the scope of our audit and the nature, timing and extent of our audit procedures and to evaluate the effect of misstatements, if any, both individually and in aggregate on the financial statements as a whole.

Overall Bank materiality	BGN 1,434 thousand
How we determined it	5% of the average profit before tax for the years 2016, 2017, 2018, 2019 and 2020.
Rationale for the materiality benchmark applied	We applied profit before tax as a benchmark because, in our view, it is the benchmark against which the performance of the Bank is commonly measured by the users of the financial statements and it is a generally accepted benchmark. We applied average profit before tax because of its volatility for the past five years.

Key audit matters

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

Key audit matter	How our audit addressed the key audit matter
Estimation uncertainty with respect to the impairment allowance for loans and advances to customers Refer to Note 6 (b) "Disclosure of financial risk management policy", "Credit risk" and Note 20 "Loans and advances to customers". The appropriateness of the impairment allowance for loans and advances to customers requires significant judgement by management. Measuring impairment allowance for loans and advances to customers under IFRS 9 requires an assessment of the 12-month and lifetime expected credit losses and assessment of significant increases in credit risk or whether loans and advances to customers are in default. As at 31 December 2020, the gross loans and advances to customers amounted to BGN 1,629,637 thousand and the related impairment allowance at that date amounted to BGN 81,971 thousand. The identification of significant increase in credit risk and default and the measurement of 12-month or life time expected credit loss are part of the Bank's estimation process and are, amongst others, based on credit risk models, triggers indicating significant increase in credit risk and default, the financial condition of the counterparty, the expected future cash flows or the value of collateral. The COVID-19 pandemic increased the uncertainty about the economic outlook and, together with various government measures, including a moratorium on credit payments, has increased the complexity of assessing and monitoring customers' financial condition, which requires an increased level of judgment in calculating impairments of loans and advances. The use of different modelling techniques, scenarios and assumptions could lead to different estimates of impairment charges on	Our audit procedures included an assessment of the overall governance of the credit and impairment process of the Bank, including 12-month and lifetime expected loss modelling processes. We have also assessed the appropriateness of the impairment models and internal methodology and their compliance with IFRS 9. We have assessed and tested the design and operating effectiveness of the controls within the lending and provisioning processes. For individually impaired loans, we have performed, for a sample of credit exposures, a detailed review of loans files. We challenged the assumptions related to impairment identification and quantification of expected future cash-flows (recoverable amounts) determined based on either valuation of underlying collateral or other recoveries. For the 12-month and lifetime expected credit losses, we challenged the significant increase in credit risk triggers and tested the underlying models, including the Bank's model approval and validation process. Supported by our modeling experts, we have performed an independent recalculation of the expected credit loss for a sample of loans. We performed an assessment of the adequacy of the Bank's assumptions and judgements related to the impact of the COVID-19 pandemic, including the moratorium on loan payments, the assessment of expected credit losses and all aspects of the process of their determination. We also assessed the completeness and accuracy of the disclosures and whether the disclosures are in compliance with the International Financial Reporting standards as adopted by the European Union.

loans and advances to customers.

As this position represents a substantial part of Bank's total assets and given the related estimation uncertainty, we consider this as a key audit matter.

Information other than the financial statements and auditors' report thereon

Management is responsible for the other information. The other information comprises Annual Activity Report and the Corporate Governance Statement, prepared by the management in accordance with Chapter Seven of the Accountancy Act, but does not include the financial statements and our auditors' report thereon.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Additional matters to be reported under the Accountancy Act

In addition to our responsibilities and reporting in accordance with ISAs, in relation to the Annual Activity Report and the Corporate Governance Statement, we have also performed the procedures added to those required under ISAs in accordance with the "Guidelines regarding the new and enhanced auditor reporting and communication by the auditor" of the professional organisation of certified public accountants and registered auditors in Bulgaria, i.e. the Institute of Certified Public Accountants (ICPA). These procedures refer to testing the existence, form and content of this other information to assist us in forming an opinion on whether the other information includes the disclosures and reporting provided for in Chapter Seven of the Accountancy Act and where applicable art. 100(m) paragraph 8 of Public Offering of Securities Act, applicable in Bulgaria.

Opinion in connection with art. 37, paragraph 6 of the Accountancy Act

Based on the procedures performed, in our opinion:

a) the information included in the Annual Activity Report for the financial year for which the financial statements are prepared is consistent with those financial statements.
b) the Annual Activity Report has been prepared in accordance with the requirements of Chapter Seven of the Accountancy Act.
c) the Corporate Governance Statement for the financial year, for which the financial statements are prepared, presents the information required by Chapter Seven of the Accountancy Act and where applicable Art. 100(m), paragraph 8 of the Public Offering of Securities Act.

Responsibilities of management and those charged with governance for the financial statements

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

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

Those charged with governance are responsible for overseeing the Bank/Company reporting process.

Auditors' responsibilities for the audit of the financial statements

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

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

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

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

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the 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.

We are jointly and severally responsible for the performance of our audit and for the audit opinion expressed by us in accordance with the requirements of the Independent Financial Audit Act, applicable in Bulgaria. In accepting and performing the engagement for the joint audit, in connection to which we report, we have also been guided by the Guidelines for the implementation of joint audit, issued on 13 June 2017 by the Institute of Certified Public Accountants, Bulgaria and the Commission for Public Oversight of Statutory Auditors in Bulgaria.

Report on other legal and regulatory requirements

Additional reporting in relation to Ordinance 58/2018 issued by the Financial Supervision Commission ("FSC")

Statement in relation to Art. 11 of Ordinance 58/2018 issued by FSC in relation to the requirements for protection of the clients' financial instruments and cash, for product management, and for the providing or receiving of remuneration, commissions and other monitory or non-monetary benefits.

Based on the audit procedures performed and the understanding of the Bank's activity, in the course and context of our audit of the financial statements as a whole, we identified that the established organization implemented for safeguarding of customers' accounts is in accordance with the requirements of Art. 3-10 of Ordinance 58 of the FSC in relation to the activities of the Bank in its capacity as an investment intermediary.

Additional reporting on the audit of the financial statements in connection with art. 10 of Regulation (EU) 537/2014 in connection with the requirements of art. 59 of the Independent Financial Audit Act

In accordance with the requirements of the Independent Financial Audit Act in connection with Art.10 of Regulation (EU) 537/2014, we hereby additionally report the information stated below:

- PricewaterhouseCoopers Audit OOD was appointed as a statutory auditor of the financial statements of the Bank for the year ended 31 December 2020 by the general meeting of shareholders held on 21 August 2020 for a period of one year. PricewaterhouseCoopers Audit OOD was first appointed as auditors of the Bank on 28 September 2018.

- HLB Bulgaria OOD was appointed as a statutory auditor of the financial statements of the Bank for the year ended 31 December 2020 by the general meeting of shareholders held on 21 August 2020 for a period of one year. HLB Bulgaria OOD was first appointed as auditors of the Bank on 28 September 2018.
- The audit of the financial statements of the Bank for the year ended 31 December 2020 represents third of total uninterrupted statutory audit engagements for that entity carried out by PricewaterhouseCoopers Audit OOD.
- The audit of the financial statements of the Bank for the year ended 31 December 2020 represents third of total uninterrupted statutory audit engagements for that entity carried out by HLB Bulgaria OOD.
- We hereby confirm that the audit opinion expressed by us is consistent with the additional report provided to the Bank's audit committee in compliance with the requirements of Art. 60 of the Independent Financial Audit Act.
- We hereby confirm that we have not provided the prohibited non-audit services referred to in Art.64 of the Independent Financial Audit Act.
- We hereby confirm that in conducting the audit we have remained independent of the Bank.
- For the period to which our statutory audit refers, we have not provided services to the Bank, in addition to the audit.

For PricewaterhouseCoopers Audit OOD:

Jock Nunan
Procurist

Anna Boteva
Registered Auditor responsible for the audit
9-11, Maria Luiza blvd.
1000 Sofia, Bulgaria

02 April 2021

For HLB Bulgaria OOD:

Dimitris Papazis
Managing Director

Stoyan Stoyanov
Registered Auditor responsible for the audit
149-151, Konstantin Velichkov blvd.,
1309 Sofia, Bulgaria

02 April 2021

Independent Auditors' Report

To the Shareholders of Allianz Bank Bulgaria AD

Report on the audit of the financial statements

Our opinion

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

In our opinion, the financial statements present fairly, in all material respects, the financial position of Allianz Bank Bulgaria AD as at 31 December 2020, and the Bank's financial performance and cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union (EU).

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditors' responsibilities for the audit of the financial statements section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Independence

We are independent of the Bank in accordance with the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code) and the ethical requirements of the Independent Financial Audit Act that are relevant to our audit of the financial statements in Bulgaria. We have fulfilled our other ethical responsibilities in accordance with the IESBA Code and the ethical requirements of the Independent Financial Audit Act.

Our audit approach

Overview

Materiality	Overall Bank materiality: BGN 1,434 thousand which represents 5% of the average profit before tax for 2016, 2017, 2018, 2019 and 2020.
Key audit matters	Estimation uncertainty with respect to the impairment allowance for loans and advances to customers.

As part of designing our audit, we determined materiality and assessed the risks of material misstatement in the financial statements. In particular, we considered where management made subjective judgements; for example, in respect of significant accounting estimates that involved making assumptions and considering future events that are inherently uncertain. As in all of our audits, we also addressed the risk of management override of internal controls, including among other matters consideration of whether there was evidence of bias that represented a risk of material misstatement due to fraud.

We tailored the scope of our audit in order to perform sufficient work to enable us to provide an opinion on the financial statements as a whole, taking into account the structure of the Bank, the accounting processes and controls, and the industry in which the Bank operates.

Materiality

The scope of our audit was influenced by our application of materiality. An audit is designed to obtain reasonable assurance whether the financial statements are free from material misstatement. Misstatements may arise due to fraud or error. They are considered material if individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

Based on our professional judgement, we determined certain quantitative thresholds for materiality, including the overall Bank materiality for the financial statements as a whole as set out in the table below. These, together with qualitative considerations, helped us to determine the scope of our audit and the nature, timing and extent of our audit procedures and to evaluate the effect of misstatements, if any, both individually and in aggregate on the financial statements as a whole.

Overall Bank materiality	BGN 1,434 thousand
How we determined it	5% of the average profit before tax for the years 2016, 2017, 2018, 2019 and 2020.
Rationale for the materiality benchmark applied	We applied profit before tax as a benchmark because, in our view, it is the benchmark against which the performance of the Bank is commonly measured by the users of the financial statements and it is a generally accepted benchmark. We applied average profit before tax because of its volatility for the past five years.

Key audit matters

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

Key audit matter	How our audit addressed the key audit matter
Estimation uncertainty with respect to the impairment allowance for loans and advances to customers Refer to Note 6 (b) "Disclosure of financial risk management policy", "Credit risk" and Note 20 "Loans and advances to customers". The appropriateness of the impairment allowance for loans and advances to customers requires significant judgement by management. Measuring impairment allowance for loans and advances to customers under IFRS 9 requires an assessment of the 12-month and lifetime expected credit losses and assessment of significant increases in credit risk or whether loans and advances to customers are in default. As at 31 December 2020, the gross loans and advances to customers amounted to BGN 1,629,637 thousand and the related impairment allowance at that date amounted to BGN 81,971 thousand. The identification of significant increase in credit risk and default and the measurement of 12-month or life time expected credit loss are part of the Bank's estimation process and are, amongst others, based on credit risk models, triggers indicating significant increase in credit risk and default, the financial condition of the counterparty, the expected future cash flows or the value of collateral. The COVID-19 pandemic increased the uncertainty about the economic outlook and, together with various government measures, including a moratorium on credit payments, has increased the complexity of assessing and monitoring customers' financial condition, which requires an increased level of judgment in calculating impairments of loans and advances. The use of different modelling techniques, scenarios and assumptions could lead to different estimates of impairment charges on	Our audit procedures included an assessment of the overall governance of the credit and impairment process of the Bank, including 12-month and lifetime expected loss modelling processes. We have also assessed the appropriateness of the impairment models and internal methodology and their compliance with IFRS 9. We have assessed and tested the design and operating effectiveness of the controls within the lending and provisioning processes. For individually impaired loans, we have performed, for a sample of credit exposures, a detailed review of loans files. We challenged the assumptions related to impairment identification and quantification of expected future cash-flows (recoverable amounts) determined based on either valuation of underlying collateral or other recoveries. For the 12-month and lifetime expected credit losses, we challenged the significant increase in credit risk triggers and tested the underlying models, including the Bank's model approval and validation process. Supported by our modeling experts, we have performed an independent recalculation of the expected credit loss for a sample of loans. We performed an assessment of the adequacy of the Bank's assumptions and judgements related to the impact of the COVID-19 pandemic, including the moratorium on loan payments, the assessment of expected credit losses and all aspects of the process of their determination. We also assessed the completeness and accuracy of the disclosures and whether the disclosures are in compliance with the International Financial Reporting standards as adopted by the European Union.

loans and advances to customers.

As this position represents a substantial part of Bank’s total assets and given the related estimation uncertainty, we consider this as a key audit matter.

Information other than the financial statements and auditors’ report thereon

Management is responsible for the other information. The other information comprises Annual Activity Report and the Corporate Governance Statement, prepared by the management in accordance with Chapter Seven of the Accountancy Act, but does not include the financial statements and our auditors’ report thereon.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Additional matters to be reported under the Accountancy Act

In addition to our responsibilities and reporting in accordance with ISAs, in relation to the Annual Activity Report and the Corporate Governance Statement, we have also performed the procedures added to those required under ISAs in accordance with the “Guidelines regarding the new and enhanced auditor reporting and communication by the auditor” of the professional organisation of certified public accountants and registered auditors in Bulgaria, i.e. the Institute of Certified Public Accountants (ICPA). These procedures refer to testing the existence, form and content of this other information to assist us in forming an opinion on whether the other information includes the disclosures and reporting provided for in Chapter Seven of the Accountancy Act and where applicable art. 100(m) paragraph 8 of Public Offering of Securities Act, applicable in Bulgaria.

Opinion in connection with art. 37, paragraph 6 of the Accountancy Act

Based on the procedures performed, in our opinion:

a) the information included in the Annual Activity Report for the financial year for which the financial statements are prepared is consistent with those financial statements.
b) the Annual Activity Report has been prepared in accordance with the requirements of Chapter Seven of the Accountancy Act.
c) the Corporate Governance Statement for the financial year, for which the financial statements are prepared, presents the information required by Chapter Seven of the Accountancy Act and where applicable Art. 100(m), paragraph 8 of the Public Offering of Securities Act.

Responsibilities of management and those charged with governance for the financial statements

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

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

Those charged with governance are responsible for overseeing the Bank/Company reporting process.

Auditors' responsibilities for the audit of the financial statements

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

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

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

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

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

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the 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.

We are jointly and severally responsible for the performance of our audit and for the audit opinion expressed by us in accordance with the requirements of the Independent Financial Audit Act, applicable in Bulgaria. In accepting and performing the engagement for the joint audit, in connection to which we report, we have also been guided by the Guidelines for the implementation of joint audit, issued on 13 June 2017 by the Institute of Certified Public Accountants, Bulgaria and the Commission for Public Oversight of Statutory Auditors in Bulgaria.

Report on other legal and regulatory requirements

Additional reporting in relation to Ordinance 58/2018 issued by the Financial Supervision Commission ("FSC")

Statement in relation to Art. 11 of Ordinance 58/2018 issued by FSC in relation to the requirements for protection of the clients' financial instruments and cash, for product management, and for the providing or receiving of remuneration, commissions and other monitory or non-monetary benefits.

Based on the audit procedures performed and the understanding of the Bank's activity, in the course and context of our audit of the financial statements as a whole, we identified that the established organization implemented for safeguarding of customers' accounts is in accordance with the requirements of Art. 3-10 of Ordinance 58 of the FSC in relation to the activities of the Bank in its capacity as an investment intermediary.

Additional reporting on the audit of the financial statements in connection with art. 10 of Regulation (EU) 537/2014 in connection with the requirements of art. 59 of the Independent Financial Audit Act

In accordance with the requirements of the Independent Financial Audit Act in connection with Art.10 of Regulation (EU) 537/2014, we hereby additionally report the information stated below:

- PricewaterhouseCoopers Audit OOD was appointed as a statutory auditor of the financial statements of the Bank for the year ended 31 December 2020 by the general meeting of shareholders held on 21 August 2020 for a period of one year. PricewaterhouseCoopers Audit OOD was first appointed as auditors of the Bank on 28 September 2018.

- HLB Bulgaria OOD was appointed as a statutory auditor of the financial statements of the Bank for the year ended 31 December 2020 by the general meeting of shareholders held on 21 August 2020 for a period of one year. HLB Bulgaria OOD was first appointed as auditors of the Bank on 28 September 2018.
- The audit of the financial statements of the Bank for the year ended 31 December 2020 represents third of total uninterrupted statutory audit engagements for that entity carried out by PricewaterhouseCoopers Audit OOD.
- The audit of the financial statements of the Bank for the year ended 31 December 2020 represents third of total uninterrupted statutory audit engagements for that entity carried out by HLB Bulgaria OOD.
- We hereby confirm that the audit opinion expressed by us is consistent with the additional report provided to the Bank's audit committee in compliance with the requirements of Art. 60 of the Independent Financial Audit Act.
- We hereby confirm that we have not provided the prohibited non-audit services referred to in Art.64 of the Independent Financial Audit Act.
- We hereby confirm that in conducting the audit we have remained independent of the Bank.
- For the period to which our statutory audit refers, we have not provided services to the Bank, in addition to the audit.

For PricewaterhouseCoopers Audit OOD:

Jock Nunan
Procurist

Anna Boteva
Registered Auditor responsible for the audit
9-11, Maria Luiza blvd.
1000 Sofia, Bulgaria

02 April 2021

For HLB Bulgaria OOD:

Dimitris Papazis
Managing Director

Stoyan Stoyanov
Registered Auditor responsible for the audit
149-151, Konstantin Velichkov blvd.,
1309 Sofia, Bulgaria

02 April 2021