ProCredit Bank

Part of the ProCredit Group

Consolidated Financial Statements 2017

PROCREDIT BANK (BULGARIA) EAD
CONSOLIDATED FINANCIAL STATEMENTS
31 DECEMBER 2017

The financial statements in English are a translation from the original, which was prepared in Bulgarian. All possible care has been taken to ensure that the translation is an accurate representation of the original. However, in all matters of interpretation of information, views or opinions, the original language version of the report takes precedence over this translation.

Table of Contents

Independent Auditors' Report

To the Shareholder of ProCredit Bank (Bulgaria) EAD

Our opinion

We have audited the consolidated financial statements of ProCredit Group (Bulgaria) EAD and its subsidiaries (the "Group") which comprise the consolidated statement of financial position as at 31 December 2017, and the consolidated statement of profit or loss, the consolidated statement of other comprehensive income, the consolidated statement of changes in equity and the consolidated statement of cash flows for the year then ended, and the notes to the consolidated financial statements, which include a summary of significant accounting policies.

In our opinion, the consolidated financial statements present fairly, in all material respects, the financial position of the Group as at 31 December 2017, and its financial performance and its cash flows for the year then ended in accordance with the 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 consolidated 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 Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) and the ethical requirements of the Independent Financial Audit Act that are relevant to our audit of the consolidated 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

As part of designing our audit, we determined materiality and assessed the risks of material misstatement in the consolidated 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 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 consolidated financial statements as a whole, taking into account the structure of the Group, the accounting processes and controls, and the industry in which the Group operates.

Materiality

The scope of our audit was influenced by our application of materiality. An audit is designed to obtain reasonable assurance whether the consolidated 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 consolidated financial statements.

Based on our professional judgement, we determined certain quantitative thresholds for materiality, including the overall materiality for the consolidated 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 consolidated financial statements as a whole.

Overall materiality	BGN 2,347 thousand
How we determined it	Approximately 7% of profit before tax
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 Group is commonly measured by the users of the consolidated financial statements and it is a generally accepted benchmark.

Key audit matters

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

Key audit matter	*How our audit addressed the key audit matter*
Impairment allowance for loans and advances to customers *Refer to Note 18 "Loans and advances to customers")* We focus on this area because management makes subjective judgement over both timing of recognition of impairment and the estimation of the amount that should be recognized. The identification of impairment and the determination of loans recoverable amounts are part of the Groups' estimations including, amongst others, the assessment of objective evidence for impairment, the probability of default, the financial condition of the debtors, the expected future cash-flows and the value of collateral. The use of different assumptions could lead to different estimates of impairment charges on loans and advances to customers. As this position represents substantial part of Groups' total assets and given the related estimation uncertainty, we consider this as a key audit matter.	Our audit approach included an assessment of the overall governance of the Groups' lending and impairment process. We have assessed the methodology for the compliance with IAS 39 "Financial instruments: classification and measurement". We have assessed and tested the design and operating effectiveness of the controls within the lending and provision processes and determined that we could rely on these controls for the purposes of the audit. 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 of future cash-flows (recoverable amounts) determined based on either valuation of underlying collateral or other recoveries. For the loan impairment calculated on a collective basis, we tested the underlying models and the appropriateness of the key inputs such as probability of default and loss given defaults, and where available, compared data and assumptions to historical experience.

Information other than the consolidated financial statements and auditors' report thereon

Management is responsible for the other information. The other information comprises *the 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 consolidated financial statements and our auditors' report thereon.

Our opinion on the consolidated 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 consolidated financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the consolidated 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 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

The management has prepared Consolidated Annual Activity Report and Corporate Governance Statement as of 31 December 2017 which was presented with the consolidated financial statements as of 31 December 2017 issued in Bulgarian language and authorized by the Management on 30 March 2018.

Based on the procedures performed, in our opinion:

a) The information included in the Consolidated Annual Activity Report referring to the financial year for which the consolidated financial statements have been prepared is consistent with those consolidated financial statements.
b) The Consolidated 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 consolidated financial statements have been prepared, presents the information required by Chapter Seven of the Accountancy Act and Art. 100(m), paragraph 8 of the Public Offering of Securities Act.

Responsibilities of management and those charged with governance for the consolidated financial statements

Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union (EU), and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.
In preparing the consolidated financial statements, management is responsible for assessing the Group'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 Group or to cease operations, or has no realistic alternative but to do so.

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

Auditors' responsibilities for the audit of the consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the consolidated 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 consolidated 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 consolidated 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 Group'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 Group'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 consolidated 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 Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

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, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated 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 Accounting 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.

Additional reporting on the audit of the consolidated 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 consolidated financial statements of the Group for the year ended 31 December 2017 by the general meeting of shareholders held on 11 December 2017 for a period of one year.
- Baker Tilly Klitou and Partners OOD was appointed as a statutory auditor of the consolidated financial statements of the Group for the year ended 31 December 2017 by the general meeting of shareholders held on 11 December 2017 for a period of one year.
- The audit of the consolidated financial statements of the Group for the year ended 31 December 2017 represents fourth of total uninterrupted statutory audit engagements for that entity carried out by PricewaterhouseCoopers Audit OOD.
- The audit of the consolidated financial statements of the Group for the year ended 31 December 2017 represents first of total uninterrupted statutory audit engagements for that entity carried out by Baker Tilly Klitou and Partners OOD.
- We hereby confirm that the audit opinion expressed by us is consistent with the additional report provided to the Group'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 Group.
- In the period 1 January 2017 - 31 December 2017, PricewaterhouseCoopers Audit OOD have provided to the Group, in addition to the audit, training courses for the amount of BGN 293 and interim review for the amount of BGN 17 thousand.

For PricewaterhouseCoopers Audit OOD:

Jock Nunan

Milka Damianova

Registered Auditor responsible for the audit

9-11, Maria Louisa Blvd.
1000 Sofia, Bulgaria

17 April 2018

Одиторско дружество София Рег. № 085 ПрайсУотърхаусКупърс Одит ООД

For Baker Tilly Klitou and Partners OOD:

Krassimira Radeva

Registered Auditor responsible for the audit

Managing Director

Одиторско дружество София Рег. № 129 Бейкър Тили Клиту и Партньори ООД

5, Stara Planina Str., 5th floor
1000 Sofia, Bulgaria

17 April 2018

Consolidated Statement of Profit or Loss

(all amounts expressed in thousands of BGN)	Notes	Year ended 31 December	
		2017	**2016**
Interest and similar income	6	62,527	69,987
Interest and similar expenses	6	(3,231)	(3,903)
Net interest income		**59,296**	**66,084**
Allowances for impairment losses on loans and advances	7,19	(665)	(3,346)
Net interest income after allowances		**58,631**	**62,738**
Fee and commission income	8	22,008	19,099
Fee and commission expenses	8	(1,978)	(1,568)
Net fee and commission income		**20,030**	**17,531**
Result from foreign exchange transactions	9	7,328	6,227
Net result from available-for-sale financial assets	10	(72)	7,292
Net other operating income	11	(481)	(2,263)
Operating income		**85,436**	**91,525**
Personnel expenses	12	(17,255)	(18,020)
Administrative expenses	13	(32,178)	(31,126)
Operating expenses		**(49,433)**	**(49,146)**
Profit before tax		36,003	42,379
Income tax expense	14	(3,838)	(4,547)
Profit for the period		**32,165**	**37,832**

These consolidated financial statements on pages 1 to 54 were approved by the Management Board and signed on its behalf by:

Rumyana Todorova
Executive Director and
Member of the Management Board
30 March 2018

Ivan Dachev
Executive Director and
Member of the Management Board

Initialled for identification purposes in reference to the auditors' report

For PricewaterhouseCoopers Audit OOD

Jock Nunan
Procurator

Milka Damianova
Registered auditor, responsible for the audit
Date: 17 April 2018
Sofia, Bulgaria

For Baker Tilly Klitou and Partners OOD

Krasimira Radeva
Registered auditor, responsible for the audit
Managing Director

Date: 17 April 2018
Sofia, Bulgaria

The notes set out on pages 6 to 54 form an integral part of these financial statements.

Consolidated Statement of Other Comprehensive Income

(all amounts expressed in thousands of BGN)	Notes	Year ended 31 December	
		2017	**2016**
Profit for the period		32,165	37,832
Items that will not be reclassified to profit or loss			
Remeasurements of post-employment benefits		-	(112)
Items that may be reclassified subsequently to profit or loss			
Change in revaluation reserve from available-for-sale financial assets		934	(5,866)
Other comprehensive income for the period, net of tax		**934**	**(5,978)**
Total comprehensive income for the period		**33,099**	**31,854**

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Date: 17 April 2018
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Consolidated Statement of Financial Position

(all amounts expressed in thousands of BGN)

	Notes	As of 31 December 2017	As of 31 December 2016
ASSETS			
Cash and cash equivalents	15	192,077	211,268
Loans and advances to banks	16	288,320	331,511
Available-for-sale financial assets	17	32,592	42,835
Loans and advances to customers	18	1,444,808	1,251,556
Allowance for losses on loans and advances to customers	19	(40,973)	(42,165)
Property, plant and equipment	20	41,295	46,772
Intangible assets	20	3,780	3,256
Deferred tax assets	21	558	303
Other assets	22	12,944	16,879
Total assets		**1,975,401**	**1,862,215**
LIABILITIES			
Liabilities to banks	23	83,858	61,943
Liabilities to customers	24	1,466,145	1,245,779
Liabilities to financial institutions	25	200,815	313,212
Other liabilities	26	6,972	5,512
Provisions	27	569	725
Current tax liabilities		373	459
Total liabilities		**1,758,732**	**1,627,630**
EQUITY			
Share capital and share premium	28	167,706	167,706
Legal reserve	28	6,461	3,953
Other reserve	28	6,514	6,514
Retained earnings		35,035	56,393
Revaluation reserve		953	19
Total equity		**216,669**	**234,585**
Total equity and liabilities		**1,975,401**	**1,862,215**

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Sofia, Bulgaria

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Consolidated Statement of Changes in Equity

(all amounts expressed in thousands of BGN)	Share capital	Share premium	Legal reserve	Other reserves	Retained earnings	Revaluation reserve	Total
Balance as of 1 January 2016	135,634	3,496	3,953	6,626	47,107	5,885	202,701
Comprehensive income for the period							
Revaluation of AFS securities	-	-	-	-	-	(5,866)	(5,866)
Revaluation of actuarial gains and losses	-	-	-	(112)	112	-	-
Other increase (decrease) in equity	-	-	-	-	(82)	-	(82)
Profit for the period	-	-	-	-	37,832	-	37,832
Total comprehensive income for the period	-	-	-	**(112)**	**37,862**	**(5,866)**	**31,884**
Transactions with owners, recorded directly in equity							
Contributions by and distributions to owners							
Capital increase	28,576	-	-	-	-	-	28,576
Distributed dividends	-	-	-	-	(28,576)	-	(28,576)
Total contributions by and distributions to owners	**28,576**	-	-	-	**(28,576)**	-	-
Balance as of 31 December 2016	**164,210**	**3,496**	**3,953**	**6,514**	**56,393**	**19**	**234,585**
Comprehensive income for the period							
Revaluation of AFS securities	-	-	-	-	-	934	934
Other increase (decrease) in equity	-	-	2,508	-	(2,508)	-	-
Profit for the period	-	-	-	-	32,165	-	32,165
Total comprehensive income for the period	-	-	**2,508**	-	**29,657**	**934**	**33,099**
Transactions with owners, recorded directly in equity							
Contributions by and distributions to owners							
Distributed dividends	-	-	-	-	(51,015)	-	(51,015)
Total contributions by and distributions to owners	-	-	-	-	**(51,015)**	-	**(51,015)**
Balance as of 31 December 2017	**164,210**	**3,496**	**6,461**	**6,514**	**35,035**	**953**	**216,669**

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Consolidated Statement of Cash Flows

(all amounts expressed in thousands of BGN)	Notes	Year ended 31 December	
		2017	2016
Profit for the period		32,165	37,832
Non-cash items included in the profit of the period and transition to the cash flow from operating activities			
Allowances for impairment losses on loans and advances	7, 19	665	3,346
Net (income)/loss from available-for-sale financial assets	10	72	(7,292)
Depreciation	13	5,143	5,514
Unrealised (gains) from currency revaluation	9	(425)	(171)
Net interests and dividends	6	(59,296)	(66,085)
Income tax expense	14	3,838	4,547
Increase/ decrease of assets and liabilities from operating activities after non-cash items			
Required reserve with the central bank		(21,271)	(18,210)
Loans and advances to banks		46,940	(37,161)
Loans and advances to customers		(196,552)	(84,994)
Other assets		4,029	5,179
Short term liabilities to banks and financial institutions		(181,880)	189,953
Liabilities to customers		220,549	131,639
Other liabilities		2,166	2,065
Interest received		64,209	76,143
Interest paid		(2,882)	(6,694)
Income tax paid		(4,274)	(4,616)
Cash (outflow)/flow from operating activities		**(86,804)**	**230,995**
Purchase of/ proceeds from sale of:			
Property, plant and equipment and intangible assets		(190)	(5,088)
Securities purchased		-	(37,974)
Securities matured		10,181	23,426
Cash flow from/(used in) investing activities		**9,991**	**(19,636)**
Cash flow from financing activities			
Dividends paid		(51,015)	(28,576)
Shares issued		-	28,576
Long term liabilities to banks and financial institutions		91,194	(25,807)
Cash flow from/(used in) financing activities		**40,179**	**(25,807)**
Net (decrease)/increase in cash and cash equivalents		**(36,634)**	**185,552**
Cash and cash equivalents at end of previous year		**384,756**	**199,204**
Cash and cash equivalents at end of period	15	**348,122**	**384,756**

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1 Reporting entity

ProCredit Bank (Bulgaria) EAD ("ProCredit Bank" or "the bank") was founded in June 2001 by an alliance of international development-oriented investors, many of which are shareholders in ProCredit Holding AG & Co. KGaA („ProCredit Holding") today. Since the beginning of 2013 the sole shareholder of the bank is ProCredit Holding.

The bank is part of the international group of financial institutions owned by ProCredit Holding. ProCredit Holding is the ultimate parent and ultimate controlling party of the ProCredit group of banks ("the ProCredit group"). The bank has one subsidiary – ProCredit Properties EAD (referred to collectively as "the group"), which is wholly owned.

The group is managed through a Supervisory Board consisting of five members and a Management Board consisting of three members as of December 2017 which are elected for a period of three years.

ProCredit Bank is a development oriented full service bank which aims to be a house bank for businesses and private clients. Business clients, serviced by the bank, are companies, agricultural producers and self-employed persons. They are categorised as Small and Medium in accordance to their business potential. Private clients are regular income receivers (salary, pension or other), students and business owners. The bank strives to have comprehensive knowledge about its customers and to implement an individual approach and strategy for servicing each client, being based on the client's profile. Strategically, the bank focuses on production companies, agricultural producers, green and energy efficiency financing.

2 Basis of preparation

a Compliance with International Financial Reporting Standards

ProCredit Bank prepares its Consolidated Financial Statements in accordance with International Financial Reporting Standards (IFRS) and interpretations issued by the IFRS Interpretations Committee ("IFRS IC") as adopted by the European Union ("EU"). IFRSs as adopted by the EU is the commonly accepted name of the general purpose framework – the basis of accounting equivalent to the framework definition introduced by § 1, p. 8 of the Additional Provisions of the Accountancy Act "International Accounting Standards" (IASs). The financial statements were prepared on a consolidated basis according to the Accountancy Act. The consolidated financial statements were approved by the Management Board on 30 March 2018.

The Consolidated Financial Statements comprise the Consolidated Statement of Profit or Loss, the Consolidated Statement of Other Comprehensive Income, the Consolidated Statement of Financial Position, the Consolidated Statement of Changes in Equity, the Consolidated Statement of Cash Flows and the Notes to the Consolidated Financial Statements. The information required by IFRS 7 on the nature and extent of risks arising from financial instruments and their management is presented in the Risk Report section of the Management Report.

The principle accounting policies have been consistently applied to all the years presented, unless otherwise stated. All amounts are presented in thousands of Bulgarian leva (BGN), unless otherwise stated. The fiscal year of the group is the calendar year. Reporting and valuation are made on a going concern assumption.

2 Basis of preparation (continued)

b Consolidation

The consolidated financial statements comprise the financial statements of ProCredit Bank (Bulgaria) EAD and its subsidiary as of 31 December 2017. Subsidiaries are all companies which are controlled by the group, i.e. for which the group can determine the financial and operating policies. The subsidiary is fully consolidated. The group had one subsidiary as of end 2016 – ProCredit Properties EAD. Intercompany transactions, balances and unrealised gains and losses on transactions between the bank and its subsidiary companies are eliminated. Where necessary, the accounting policies of the subsidiary have been changed to ensure consistency with the policy adopted by the group. The purchase method of accounting is used to account for the acquisition of subsidiaries by the group.

c Measurement basis

These consolidated financial statements were prepared under the historical cost convention, unless IFRS require recognition at fair value. Financial instruments measured at fair value for accounting purposes on an ongoing basis include all financial instruments classified as available-for-sale. Details on the applied measurement techniques for the balance sheet positions are part of the accounting policies listed below.

d Use of assumptions and estimates

The group's financial reporting and its financial result are influenced by assumptions, estimates and management judgements which necessarily have to be made in the course of preparation of the Consolidated Financial Statements.

All estimates and assumptions required in conformity with IFRS are best estimates undertaken in accordance with applicable standard. Estimates and judgements are evaluated on continuous basis, and are based on past experience and other factors, including expectations with regard to future events and are considered appropriate under the given circumstances.

Management judgements for certain items are especially critical for the group's results and financial situation due to their maternity in amount. This applies to the following positions:

Impairment of credit exposures
The group reviews its loan portfolios to assess impairment at least once per month. In determining whether an impairment loss should be recorded in the Statement of Profit or Loss, the group makes judgements as to whether there are any observable data indicating that there is a measurable decrease in the estimated future cash flows from a portfolio of loans before the decrease can be identified with an individual loan in that portfolio. This evidence may include observable data indicating that there has been an adverse change in the payment status of borrowers in a group, or national economic conditions that correlate with defaults on assets in the group of borrowers. The group's management uses estimates based on historical loss experience for assets with credit risk characteristics and objective evidence of impairment similar to those in the portfolio when scheduling its future cash flows. The methodology and assumptions used for estimating both the amount and timing of future cash flows are reviewed regularly to reduce any differences between loss estimates and actual loss experience.

2 Basis of preparation (continued)

d Use of assumptions and estimates (continued)

Measurement of deferred tax asset

The group recognises deferred tax assets only to the extent that it is probable that taxable profits will be available against which the tax-reducing effects can be utilised (for the group's accounting policy for income taxes see note 14). The profit projection is based on the latest business planning as of December 2017 approved by the Supervisory Board of the respective entity and therefore reflects management's view of future business prospects. The tax planning period of the group is five years. For details on the recognised amounts see notes 14 and 21.

e New and amended standards adopted by the group

This note provides a list of the significant accounting policies adopted in the preparation of these financial statements to the extent they have not already been disclosed in the other notes above. These policies have been consistently applied to all the years presented, unless otherwise stated.

(i) Compliance with IFRS

The financial statements of the group have been prepared in accordance with International Financial Reporting Standards (IFRS) and interpretations issued by the IFRS Interpretations Committee (IFRS IC) applicable to companies reporting under IFRS as adopted by the European Union.

(ii) Historical cost convention

The financial statements have been prepared on a historical cost basis, except for the following:

- available-for-sale financial assets, financial assets and liabilities (including derivative instruments) certain classes of property, plant and equipment and investment property – measured at fair value;
- assets held for sale – measured at fair value less cost of disposal, and
- defined benefit pension plans – plan assets measured at fair value.

(iii) Standards, amendments and interpretations effective on or after 1 January 2017

- *Amendments to IAS 7* "Disclosure Initiative" have a minor impact on the financial statements. The amendments are effective for annual periods beginning on or after 1 January 2017.
- *Amendments to IAS 12* "Recognition of Deferred Tax Assets for Unrealised Losses" have a minor impact on the financial statements. The amendments are effective for annual periods beginning on or after 1 January 2017.

The following standards, amendments or interpretations were issued by the IASB and endorsed by the EU and have no impact on the bank's financial statements: Annual Improvements to IFRS Standards 2014-2016 Cycle.

(iv) Standards, amendments and interpretations issued but not yet effective

The following standards, amendments and interpretations were issued by the IASB and will have an impact on the financial statements. These were not applied in preparing these financial statements:

2 Basis of preparation (continued)

e New and amended standards adopted by the group (continued)

(iv) Standards, amendments and interpretations issued but not yet effective (continued)

IFRS 9 "Financial Instruments" will have an impact on the classification and measurement of financial instruments and on the recognition of impairment. In order to be able to perform the classification, a business model test was first carried out. This provided confirmation that the group's business model is to hold financial assets or to hold and sell them as part of the liquidity reserve. The second step comprised a cashflow characteristics test as part of the classification of financial instruments; this test confirmed that the underlying contractual conditions give rise on specified dates to cashflows that are solely payments of principal and interest on the principal amount outstanding. Overall, the analysis demonstrated that the application of IFRS 9 in the measurement categories results in no major changes. Financial instruments categorised as loans and receivables are measured at amortised cost; instruments categorised as financial assets at fair value through profit or loss are measured at fair value, with fair value changes recognised in profit or loss; instruments categorised as available-for-sale financial assets are measured at fair value, with fair value changes recognised in equity. The requirements for impairment also change under IFRS 9. The expected credit loss will be taken into account in the future when recognising impairment. Loss allowances are measured already at initial recognition of the financial asset based on the potential expected credit loss at that time. According to the expected credit loss model in IFRS 9, loss allowances are recognised for expected credit losses which could result from default events of performing credit exposures within the next 12 months (Stage 1). For assets which are still performing but whose credit risk has increased significantly since initial recognition (Stage 2) and for assets which are impaired (Stage 3), IFRS 9 requires the recognition of loss allowances for the expected credit losses for the entire remaining maturity of the asset. The transition to IFRS 9 increases loss allowance and will result in a reduction in the CET 1 capital ratio by 0.06%. As the effect is insignificant, the group will not apply the transitional arrangements for mitigating the impact of the introduction of IFRS 9 on own funds as stipulated in Regulation (EU) 2017/2395.

The hedge accounting requirements have not affected the financial statements as the group does not apply hedge accounting. IFRS 9 is applicable for annual periods beginning on or after 1 January 2018.

- In October 2017, the IASB issued an amendment to *IFRS 9, "Prepayment Features with Negative Compensation"*, in order to address concerns regarding how to classify certain financial instruments with prepayment features in accordance with IFRS 9. The amendments are to be applied retrospectively for annual periods beginning on or after 1 January 2019.

- *IFRS 15 "Revenue from Contracts with Customers"* and amendments to IFRS 15 "Clarifications to IFRS 15" will have a minor impact on the financial statements. Both are effective for annual periods beginning on or after 1 January 2018.

- *IFRIC 22 "Foreign Currency Transactions and Advance Consideration"* will have a minor impact on the financial statements. The interpretation is effective for annual periods beginning on or after 1 January 2018.

- *Amendments to IAS 40 "Transfers of Investment Property"* will have a minor impact on the financial statements. The amendments are effective for annual periods beginning on or after 1 January 2018.

2 Basis of preparation (continued)

e New and amended standards adopted by the group (continued)

(iv) Standards, amendments and interpretations issued but not yet effective (continued)

- *IFRS 16 "Leases"* will have an impact on the recognition, measurement, presentation and disclosure of existing contracts as lessee. Receivables from finance leases are relatively small. The overall impact of the standard is currently being assessed. The standard is applicable for annual periods beginning on or after 1 January 2019.

The following standards, amendments and interpretations were issued by the IASB but will not have an impact on the financial statements: IFRS 17 "Insurance Contracts", IFRIC 23 "Uncertainty over Income Tax Treatments", amendments to IAS 19 "Plan Amendment, Curtailment or Settlement", amendments to IAS 28 "Long-term Interests in Associates and Joint Ventures", amendments to IFRS 4 "Applying IFRS 9 Financial Instruments with IFRS 4 Insurance Contracts" as well as the annual improvements to IFRS (2015-2017).

There was no early adoption of any standards, amendments or interpretations not yet effective.

3 Summary of significant accounting policies

This note provides a list of the significant accounting policies adopted in the preparation of these financial statements to the extent they have not already been disclosed in the other notes above. These policies have been consistently applied to all the years presented, unless otherwise stated.

a Foreign currency translation

(a) Functional and presentation currency
Items included in the financial statements are measured using the currency with which the entity operates in its primary economic environment (“the functional currency”). The financial statements are presented in Bulgarian leva, which is the group’s functional and presentation currency. All amounts stated within the financial statements are presented in thousands of Bulgarian leva unless otherwise specified.

(b) Transactions and balances
Foreign currency assets and liabilities are translated into the functional currency using the closing exchange rates, and items of income and expenses are translated at the monthly average rate of exchange when these approximate actual rates. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation at year-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognised in the Consolidated Statement of Profit or Loss (result from foreign exchange transactions).

In the case of changes in the fair value of available-for-sale assets denominated in foreign currency a distinction is made between translation differences resulting from changes in amortised cost of the security and other changes in the carrying amount of the security. Translation differences on available-for-sale assets are recognised in the Consolidated Statement of Profit or Loss.

Non-monetary items measured at historical cost denominated in foreign currency are translated with the historical exchange rate as of the date of the transaction.

As of 31 December 2017, monetary assets and liabilities denominated in foreign currency were translated into Bulgarian leva at the official central bank exchange rate: BGN 1.95583 for EUR 1 and BGN 1.63081 for USD 1 (2016: BGN 1.95583 for EUR 1 and BGN 1.85545 for USD 1).

b Interest income and expenses

Interest income and expenses for all interest-bearing financial instruments are recognised within “Interest income” and “Interest expense” in the Statement of Profit or Loss using the effective interest rate method in the period in which they arise.

For loans where there is objective evidence that an impairment loss has been incurred, the accrual of interest income is terminated not later than 90 days after the last payment. Payments received with respect to written-off loans are not recognised in “Net interest income” but are recognized as “Recovery of written-off loans”.

3 Summary of significant accounting policies (continued)

c Fee and commission income and expenses

Fees and commissions consist mainly of fees for Bulgarian leva and foreign currency transactions, and are generally recognised on an accrual basis. Fee and commission expenses concern fees incurred by the group in dealings with other banks and are recognised on the date of the transaction. Asset management fees related to the servicing of loans, originated by the group and transferred to other companies are recognised over the period to which they relate.

d Result from foreign exchange transactions

"Result from foreign exchange transactions" refers primarily to the results of foreign exchange dealings with and for customers. The group does not engage in any foreign currency trading on its own account. In addition, this position includes the result from foreign currency hedging operations and unrealised foreign currency revaluation effects. The group does not apply hedge accounting as defined by IAS 39.

e Financial assets

The group classifies its financial assets as available-for-sale financial assets or loans and receivables. The group holds no financial assets at fair value through profit or loss or held-to-maturity instruments. Management determines the classification of financial assets at the time of initial recognition.

(i) Available-for-sale financial assets
Available-for-sale assets are those intended to be held for an indefinite amount of time, which may be sold in response to needs for liquidity or changes in interest rates, exchange rates or equity prices.

At initial recognition, available-for-sale financial assets are recorded at fair value. Subsequently they are carried at fair value. In exceptional cases, in which fair value information cannot otherwise be measured reliably, they are measured at cost. The fair values reported are either observable market prices in active markets or values calculated with a valuation technique based on currently observable market data. Gains and losses arising from changes in fair value of available-for-sale financial assets are recognised in the Consolidated Statement of Profit or Loss and Other Comprehensive Income in the position "Revaluation reserve from available-for-sale financial asset", until the financial asset is derecognised or impaired (for details on impairment, see note 3g). At this time, the cumulative gain or loss previously recognised in equity in other comprehensive income is recognised in profit or loss as "Net result from available-for-sale financial assets". Interest calculated using the effective interest rate method and foreign currency gains and losses on monetary assets classified as available-for-sale are recognised in the Consolidated Statement of Profit or Loss. Dividends on available-for-sale equity instruments are recognised in the Consolidated Statement of Profit or Loss when the entity's right to receive the payment is established.

Purchases and sales of available-for-sale financial assets are recorded on the trade date. The available-for-sale financial assets are derecognised when the rights to receive cash flows from the financial assets have expired or where the group has transferred substantially all risks and rewards of ownership.

3 Summary of significant accounting policies (continued)

e Financial assets (continued)

(ii) Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. All loans and advances to banks as well as loans and advances to customers fall under the category “Loans and receivables”. They arise when the group provides money, goods or services directly to a debtor with no intention of trading the receivable.

Loans and receivables are initially recognised at fair value including transaction costs; subsequently they are measured at amortised cost using the effective interest method. Amortised premiums and discounts are accounted for over the respective terms in the Consolidated Statement of Profit or Loss under “net interest income”. At each balance sheet date and whenever there is evidence of potential impairment, the group assesses the value of its loans and receivables. As a consequence, their carrying amount may be reduced through the use of an allowance account (see note 3g for the accounting policy for impairment of credit exposures, as well as note 4c and note 19). If the amount of the impairment loss decreases, the impairment allowance is reduced accordingly, and the amount of the reduction is recognised in the Consolidated Statement of Profit or Loss.

Loans are recognised when the principal is advanced to the borrowers. Loans and receivables are derecognised when the rights to receive cash flows from the financial assets have expired or where the group has transferred substantially all risks and rewards of ownership. In addition, when loans and receivables are restructured with substantially different terms and conditions, the original financial asset is derecognised and replaced with the new financial asset.

For the purposes of the cash flow statement, claims to banks with a remaining maturity of less than three months from the date of acquisition are recognised under “Cash and cash equivalents” (see note 15).

Fair value measurement principles

On initial recognition financial instruments are measured at fair value. In principle, this is the transaction price at the time they are acquired. Depending on their respective category, financial instruments are recognised in the statement of financial position subsequently either at (amortised) cost or fair value.

Fair value is defined as the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction in the principal (or most advantageous) market between market participants at the measurement. The fair value of a liability reflects its non-performance risk.

If an asset or a liability measured at fair value has a bid price and an ask price, then the group measures assets and long positions at a bid price and liabilities and short positions at an ask price.

The fair value of a demand deposit is not less than the amount payable on demand, discounted from the first date on which the amount could be required to be paid. The group recognises transfers between levels of the fair value hierarchy as of the end of the reporting period during which the change has occurred.

3 Summary of significant accounting policies (continued)

e Financial assets (continued)

The group applies the IFRS fair value, with a three-level categorisation of the inputs used in valuation techniques to measure fair value.

Level 1 Inputs
Quoted prices (unadjusted) in active markets for identical assets or liabilities that the entity can access at the measurement date. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis.

Level 2 Inputs
Other than quoted market prices included within Level 1 that are observable for the asset or liability, either directly or indirectly. The valuation techniques applied refer to the current fair value of similar instruments and discounted cash flow analysis using observable market parameters.

Level 3 Inputs
Unobservable inputs for the asset or liability. If observable market rates are not available, internal rates are used as an input for a discounted cash flow model. Internal rates are determined taking into consideration the cost of capital depending on currencies and maturities plus a risk margin. Internal rates are regularly compared to those applied for third party transactions and are consistent with the parameters of an orderly transaction between market participants under market conditions at the measurement date.

f Cash and cash equivalents

For the purposes of the balance sheet, cash and cash equivalents comprise cash and balances with Bulgarian National Bank ("BNB"). Generally, all cash and cash equivalent items are recognised at their nominal value.

For the purposes of the cash flow statement, cash and cash equivalents comprise balances with less than three months' maturity including: cash, balances with the BNB excluding the minimum required reserve, and amounts due from other banks.

g Allowance for losses on loans and advances

(i) Impairment of loans and advances
The group assesses at each balance sheet date whether there is objective evidence that a financial asset or group of financial assets is impaired. If there is objective evidence that impairment of a credit exposure or a portfolio of credit exposures has occurred which influences the future cash flow of the financial asset(s), the respective losses are immediately recognised. Depending on the size of the exposure, such losses are either calculated on an individual credit exposure basis or are collectively assessed for a portfolio of credit exposures. Collective assessment is carried out if on an individual basis objective evidence of impairment does not exist. The carrying amount of the exposure is reduced through the use of an allowance account and the amount of the loss is recognised in the statement of profit or loss. The group does not recognise losses from expected future loss events.

3 Summary of significant accounting policies (continued)

g Allowance for losses on loans and advances (continued)

Individually assessed loans and advances
Credit exposures are considered individually significant if they exceed EUR 30,000. For such exposures, it is assessed whether any signs of impairment exist that could lead to an impairment loss, i.e. any factors which might influence a customer's ability to fulfil his contractual payment obligations towards the group:
- delinquencies in contractual payments of interest or principal, in particular being more that 30 days in arrears;
- breach of contractual covenants or conditions
- initiation of bankruptcy proceedings or financial reorganisation;
- initiation of court procedures by the bank;
- all or part of the off-balance sheet exposure of a client shows signs of impairment;
- credit exposures in the highest risk class;
- any specific information on the customer's business that is expected to have a negative impact on the future cash flow; Changes in the customer's market environment that are expected to have a negative impact on the future cash flow;
- changes in the customer's market environment that are expected to have a negative impact on the future cash flow.

When determining the allowance for impairment, the aggregate exposure to the customer and the claimable amount of collateral held are taken into account.

If there is objective evidence that an impairment loss has been incurred, the amount of the loss is measured as the difference between the asset's carrying amount and the present value of its estimated future cash flows discounted at the financial asset's original effective interest rate (specific impairment).

The calculation of the present value of the estimated future cash flow of a collateralised financial asset reflects the cash flow that may result from foreclosure less costs for obtaining and selling the collateral.

Collectively assessed loans and advances
There are two cases in which exposures are collectively assessed for impairment:
- individually insignificant exposures that show objective evidence of impairment;
- a group of loans that does not show signs of impairment, in order to cover all losses which have already been incurred but not detected on an individual loan basis.

For the purposes of the evaluation of impairment of individually insignificant credit exposures, the credit exposures are grouped on the basis of similar credit risk characteristics, i.e. according to the number of days they are in arrears. Arrears of 30 or more days are considered to be a sign of impairment. This characteristic is relevant for the estimation of future cash flows for the so defined groups of such assets, based on historical loss experiences with loans that showed similar characteristics.

The collective assessment of impairment for individually insignificant credit exposures (allowance for individually insignificant impaired loans) and for unimpaired credit exposures (allowance for collectively assessed loans) is based on a quantitative analysis of default rates for loan portfolios with similar risk characteristics (migration analysis).

3 Summary of significant accounting policies (continued)

g Allowance for losses on loans and advances (continued)

Future cash flows in a group of financial assets that are collectively assessed for impairment are estimated on the basis of the contractual cash flows of the assets in the group and historical loss experience for assets with credit risk characteristics similar to those in the group. Historical loss experience is adjusted on the basis of current observable data to reflect the effects of current conditions that did not affect the period on which the historical loss experience is based and to remove the effects of conditions in the historical period that do not exist currently. The methodology and assumptions used for estimating future cash flows are reviewed regularly by the group to reduce any differences between loss estimates and actual loss experience.

If the group determines that no objective evidence of impairment exists for an individually assessed financial asset, whether individually significant or not, it includes the asset in a group of financial assets with similar credit risk characteristics and collectively assesses them for impairment (impairment for collectively assessed exposures).

(ii) Reversal of impairment
If, in a subsequent period, the amount of the impairment loss decreases and the decrease can be related objectively to an event occurring after the impairment was recognised, the previously recognised impairment loss is reversed by adjusting the allowance account. The amount of the reversal is recognised in the Consolidated Statement of Profit or Loss.

(iii) Writing off loans and advances
When an exposure is uncollectible, it is written off against the related allowance for loan impairment. Such loans are written off after all the necessary legal procedures have been completed and the amount of the loss has been determined. Subsequent recoveries of amounts previously written off are recognised in the Consolidated Statement of Profit or Loss as part of the allowance for impairment losses on loans and advances.

(iv) Restructured credit exposures
Restructured credit exposures which would otherwise be past due or impaired and which are considered to be individually significant are provisioned on an individual basis. The amount of the loss is measured as the difference between the restructured loan’s carrying amount and the present value of its estimated future cash flows discounted at the loan’s original effective interest rate (specific impairment). Restructured loans which would otherwise be past due or impaired and which are individually insignificant are collectively assessed for impairment. The same applies to individually significant loans, where on an individual basis it has been determined that no impairment loss would occur.

(v) Assets acquired in exchange for loans (repossessed property)

Repossessed properties are non-financial assets acquired in exchange for loans as part of an orderly realisation are reported as “Other assets”. The asset acquired is recorded at the lower of its fair value less costs to sell and the carrying amount of the loan at the date of exchange. Repossessed properties are held for sale and no depreciation is charged for the respective assets. Any subsequent write-down of the acquired asset to fair value less costs to sell is recognised in the Consolidated Statement of Profit or Loss in “Net other operating income”. Any subsequent increase in the fair value less costs to sell, to the extent this does not exceed the cumulative write-down, is also recognised in “Net other operating income”, together with any realised gains or losses on disposal.

3 Summary of significant accounting policies (continued)

h Intangible assets

Software and licences

Acquired or developed computer software is capitalised on the basis of the costs incurred to acquire or develop and bring to use the specific software. These costs are amortised on the basis of the expected useful lives. Software has an expected useful lifetime of 5 years and is tested for impairment if there are indications that impairment may have occurred. Computer software is carried at cost less accumulated amortisation less impairment losses. Depreciation is calculated as follows:

Licences	7 years
Software	5 years

i Property, plant and equipment and Investment property

Property, plant and equipment are stated at historical cost less scheduled depreciation and impairment losses, as decided by the management. Historical cost includes expenditure that is directly attributable to the acquisition of the items. Component parts of an asset are recognised separately if they have different useful lives or provide benefits to the enterprise in a different pattern.

Subsequent costs are included in the asset's carrying amount or are recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the group and the cost of the item can be measured reliably. All other repairs and maintenance are charged to the Consolidated Statement of Profit or Loss during the financial period in which they are incurred.

Land is not depreciated. Depreciation on other assets is calculated using the straight-line method to allocate their depreciable amount of the asset over its useful live, as follows:

Buildings	40 years
Furniture	10 years
Leasehold improvements	10 years
Computers	5 years
Motor vehicles	5 years
Other fixed assets	7 years

The assets' residual carrying values and useful lives are reviewed, and adjusted if appropriate, at each balance sheet date.

In addition, all assets are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An asset's carrying amount is written down immediately to its recoverable amount if the asset's carrying amount exceeds its estimated recoverable amount. The recoverable amount is the higher of the asset's fair value less costs to sell and value in use. The impairment is recognised within "Other administrative expenses".

Gains and losses on disposals are determined by comparing the proceeds with carrying amount and are recognised within "Net other operating income" in the Consolidated Statement of Profit or Loss.

3 Summary of significant accounting policies (continued)

j Leases

Operating leases when the group is the lessee
Operating leases are all lease agreements in which a significant portion of the risks and rewards of ownership are retained by the lessor. The total payments made under operating leases are charged to the Consolidated Statement of Profit or Loss under “Administrative expenses” on a straight-line basis over the period of the lease. The leasing objects are recognised by the lessor.

k Income taxes

Taxation has been provided for in the consolidated financial statements in accordance with Bulgarian legislation.

(a) Current income tax
Current tax is calculated on the basis of the taxable profit for the year, using the tax rates enacted at the reporting date and is recognised as an expense in the period in which taxable profits arise. Taxes other than on income are recorded under “Other administrative expenses”.

(b) Deferred income tax
Deferred income tax is provided in full, using the liability method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the Consolidated Financial Statements prepared in conformity with IFRS. Deferred tax assets and liabilities are determined using Bulgarian tax rates (and laws) that have been enacted by the balance sheet date and are expected to apply when the related deferred income tax asset is realised or the deferred income tax liability is settled. The tax planning period is five years.

Changes of deferred taxes related to fair value re-measurement of available-for-sale financial instruments are charged to the Consolidated Statement of Other Comprehensive Income. The presentation in the Consolidated Statement of Other Comprehensive Income is made on a gross basis. At the time of sale, the respective deferred taxes are transferred to current income tax

l Liabilities to banks, customers and institutions

All liabilities are recognised initially at fair value net of transaction costs incurred. They are subsequently measured at amortised cost using the effective interest method. Any difference between proceeds net of transaction costs and the redemption value is recognised in the consolidated Statement of Profit or Loss over the period of the debt instrument. Financial liabilities at amortised cost are derecognised when they are extinguished – that is, when the obligation is discharged, cancelled or expired.

m Provisions

Provisions are recognised if:
- there is a present legal or constructive obligation resulting from past events;
- it is more likely than not that an outflow of resources will be required to settle the obligation;
- and the amount can be reliably estimated.

Where there are a number of similar obligations, the likelihood that an outflow of resources will be required in a settlement is determined by considering the class of obligations as a whole.

3 Summary of significant accounting policies (continued)

m Provisions (continued)

Provisions for which the timing of the outflow of resources is known are measured at the present value of the expenditures. If the outflow will not be earlier than in one year's time, the respective provision will be discounted. The increase in the present value of the obligation due to the passage of time is recognised as an interest expense.

Contingent liabilities, which mainly consist of certain guarantees and letters of credit issued for customers, are possible obligations that arise from past events. As their occurrence, or non-occurrence, depends on uncertain future events not wholly within the control of the group, they are not recognised in the financial statements but are disclosed in the notes to the financial statements (see note 30).

Employee entitlements to annual leave are recognised when they are accrued to employees. A provision is made for the estimated annual leave as a result of services rendered by employees up to reporting date.

n Financial guarantee contracts

Financial guarantees are initially recognised in the financial statements at fair value on the date the guarantee was given. Subsequent to initial recognition, the group's liabilities under such guarantees are measured at the higher of the initial measurement, less amortisation calculated to recognise in the Statement of Profit or Loss the fee income earned on a straight line basis over the life of the guarantee and the best estimate of the expenditure required to settle any financial obligation arising at the reporting date. These estimates are determined based on experience of similar transactions and history of past losses, supplemented by the judgement of the Management.

o Employee benefits

Defined benefit plans
The group has an obligation to pay certain amounts to each employee who retires with the group in accordance with Art. 222, § 3 of the Labour Code ("LC"). According to the regulations in the LC, when a labour contract of a group employee, who has acquired a pension right, is ended, the group is obliged to pay the employee compensation equivalent to two gross monthly salaries. In the event that the employee's length of service in the group is equal to or exceeds 10 years, as of the date of retirement, then the compensation shall amount to six gross monthly salary payments. As of reporting date, the Management of the group estimates the approximate amount of the potential expenditures for every employee based on a calculation performed by a qualified actuary using the projected unit credit method. The group recognises all actuarial gains and losses arising from defined benefit plans in personnel expenses for the period.

4 Risk management

a Business model and business strategy

ProCredit Bank aims at being a leading partner providing a complete range of financial services for small and medium enterprises in Bulgaria, since these businesses have vital significance for the economic development and the creation of new jobs. The bank functions in a responsible and transparent way, focusing on building long-term relationships with its clients and providing an inclusive range of professional and flexible business solutions, both for the businesses and for their owners and staff. The main competitive advantages of ProCredit Bank are the personal approach to the individual needs of the clients and the high quality of the services provided.

By offering simple and accessible deposit facilities the bank promotes a culture of savings, which contributes to greater security and stability of households. At the same time ProCredit Bank does not offer complex financial products or asset management services. ProCredit Bank takes an individual approach to its clients, aiming to know their needs in order to develop a strategy for serving them effectively. The bank adheres to its concept of “Know your Customer”, which is based on the assumption that if clients and their businesses are accurately identified, the bank will be able to provide them with the most suitable banking services. A strategic focus of the work with clients is on funding projects leading to improving energy efficiency and environmental protection as well as funding production companies and agricultural producers. To achieve more efficient, effective and better-quality service, the bank provides 24-hour access to self-service areas as well as easily accessible Internet banking operations (ProBanking).

The ProCredit Bank business strategy has two main purposes – to have a positive effect on the development of the economic and social environment, and to earn a commercial profit. The business model is straightforward, with asset-side operations dominated by credit issued to clients, while the liabilities basically comprise attracted funds from clients.

The business strategy is based on a focused approach to staff development. The group carefully recruits and trains its staff to work responsibly and professionally with clients. ProCredit Bank is an institution based on professionalism, communication and trust and it aims at a high level of satisfaction both for the staff and the clients. To this effect, the bank makes significant investments in training its personnel.

Since November 2015 the group operates a branch in Thessaloniki, Greece offering full range of banking services to the local businesses and providing professional service and advice. All locations in Thessaloniki are equipped with modern self-service areas, which are available to customers 24 hours and 7 days a week.

b Risk management strategy

In accordance with the simple, transparent and sustainable business strategy, the risk strategy is a conservative one. The aim is to achieve steady results, despite volatile external conditions, by following a consistent approach to managing risks. The principles of the business activity, as listed below, provide the foundation for the risk management. The consistent application of these principles significantly reduces the risks to which the group is exposed.

4 Risk management (continued)

b Risk management strategy (continued)

- **Focus on core business**

ProCredit Bank focuses on the provision of financial services to small and medium-sized businesses as well as to private clients. Accordingly, income is generated primarily in the form of interest income on customer loans and fee income from banking transactions. All of the bank's other operations are performed mainly in support of the core business. ProCredit Bank assumes mainly customer credit risk and operational risk in the course of the day-to-day operations. At the same time, the group avoids or strictly limits all other risks involved in banking operations even at the expense of forgone income opportunities.

- **High degree of transparency, simplicity and diversification**

The focus on small and medium enterprises results in a high degree of diversification, both in the credit portfolio and in the deposit base. This is achieved on the levels of client groups, business sectors and avoidance of concentration. The simple and easily understandable products both aid transparency and facilitate risk management.

- **Careful staff selection and intensive training**

Responsible banking means long-term relationships not only with clients, but with the employees of the bank. The basic elements of the personnel management approach at the bank are: recruitment, involving a six-month intensive training programme for all candidates (ProCredit Entry Programme), regular trainings for current employees, intensive managerial training at the ProCredit Academies and applying a universal remuneration structure across the ProCredit group, based on fixed monthly salaries.

Other elements of the risk management approach include mechanisms designed to hedge and mitigate risks, and processes for monitoring the continuing effectiveness of these hedging and mitigating mechanisms. Specifically:

- The group applies a risk management framework, which is binding for all ProCredit institutions and defines group-wide minimum standards for risk management. The risk management policies and standards are approved by the Management of the group are updated at least annually. These policies and standards are based on the "Minimum Requirements for Risk Management" (MaRisk) and are compliant with the specifics of the bank's activities, the regulatory requirements of the Bulgarian National Bank and the situation in the country.
- All risks incurred by the group are managed by ensuring at all times an adequate level of capital and risk bearing capacity.
- Early warning indicators (reporting triggers) and limits are set and monitored for all material risks.
- Regular stress tests are performed for all material risks.
- Regular and ad hoc reporting on the risk profile, including detailed descriptions and commentaries, is carried out.
- Monitoring and control of risks and possible risk concentrations is carried out using comprehensive analysis tools for all material risks.
- The effectiveness of the chosen measures, limits and methods is continuously monitored and controlled. This also includes back testing of the models used.
- All new or significantly changed business processes, products or instruments undergo a "New Risk Approval" (NRA) process before being used for the first time. This ensures that new risks are assessed and all necessary preparations and tests are completed prior to implementation.

4 Risk management (continued)

b Risk management strategy (continued)

While the business strategy lists the objectives of the group for all material business activities and presents measures to be taken to achieve them, the group risk strategy addresses the material risks arising from the implementation of business strategy and defines the objectives and measures of risk management. The risk strategy is broken down into strategies for all material risks and business activities in the group. The annually conducted risk inventory ensures that all material and non-material risks are identified and, if necessary, considered in the strategies.

Organisation of the risk management function

The overall responsibility for risk management is assumed by the Management Board of the group. The group has an Assets and Liabilities Committee ("ALCO"), which comprises Management Board members and it is convened at least once per month. The organizational structure of risk management encompasses also Risk Management Department, as well as specialised committees that address individual risks. In addition, the risk departments of the group report regularly to the different risk functions at ProCredit Holding, and the Supervisory Board is informed on at least a quarterly basis on all risk-relevant developments. Furthermore, the Management of the group is advised and supported by the compliance function, ensuring the implementation of legal regulations and requirements and avoiding the risks associated with non-compliance.

The rules regulating risk management at the group are part of the Internal Regulations and determine:

- The process and the purposes of risk management at the bank;
- The structure, composition and powers of the competent internal bodies of the bank, their activities and the measures they undertake;
- The employees' duties related to monitoring, reporting, management and analysis of various risks;
- The establishment and functioning of internal control systems and the competences of the relevant management levels and of the regular staff for taking part in risk management.

The control of risks is operationally exercised by the responsible departments with the risk management function being actively supported by Management Information System Department and Risk Management Department. The responsibilities include monitoring risk positions and compliance with limits, performing the group's capital planning and monitoring risk-bearing capacity. Risk positions are analysed regularly, discussed intensively and documented in standardised reports. Monitoring of the risk profile is carried out through a review of these reports and of additionally generated information. If necessary, additional topic-specific ad hoc reporting occurs. The aim is to achieve transparency on the material risks and to be aware at an early stage if potential problems might be arising. On the basis of these risk reports, ProCredit Holding prepares an aggregate risk report on a ProCredit Group level.

Adequate processes and procedures for an effective internal control system are in place. The system is built around the principles of segregation of duties, dual control and for all risk-relevant operations the separation of front and back office up to the management level.

Internal audit is managed as an independent functional area within ProCredit Bank. The Internal Audit Department carries out the auditing procedures established by the ProCredit Holding's Group Audit. Once per year, the Internal Audit Departments carries out risk assessments of all of the bank's activities in order to arrive at a risk-based annual audit plan. The Internal Audit Department reports to an Audit Committee, which generally meets on a quarterly basis.

4 Risk management (continued)

b Risk management strategy (continued)

Regular regional and ProCredit group-wide meetings and training events support the exchange of best practices and the development and enhancement of the risk management function.

c Credit risk

The group defines credit risk as the risk that the party to a transaction fails to meet its contractual obligations, or fails to meet them in full or on time. It comprises the risk arising from customer credit exposures as well as counterparty risk (including issuer risk) and country risk. As a consequence of the business model, credit exposures to customers dominate the balance sheet and thus being the most significant risk facing the group, and customer credit exposures account for the largest share of that risk.

Maximum exposure to credit risk

Exposure types	31 Dec 2017	31 Dec 2016
Loans and advances to banks	**288,320**	**331,511**
Available-for-sale financial assets	**28,729**	**39,655**
Fixed interest rate securities	28,729	39,655
Loans and advances to customers	**1,403,835**	**1,209,391**
Loans and advances to customers	1,444,808	1,251,556
Allowance for losses on loans and advances to customers	(40,973)	(42,165)
Contingent liabilities and commitments	**268,355**	**269,256**
Guarantees	34,536	32,303
Letters of credit	2,754	173
Credit commitments (revocable loan commitments)	231,065	236,780

The group has developed procedures to effectively manage the credit risk posed by its clients. The thorough knowledge of the risks associated with the target clients has been the basis for drafting the policies that stipulate the requirements for risk management. For the lending operations the following principles are applied:

- intensive analysis of the debt-servicing capacity of the banks' clients
- carefully documenting credit risk analyses and processes conducted during lending operations, ensuring that the analyses performed can be understood by knowledgeable third parties
- rigorously avoiding over-indebtedness among the banks' customers
- building a personal and long-term relationship with the client, maintaining regular contact
- strictly monitoring credit exposure repayment
- closely customer-oriented, intensified loan management in the event of arrears
- collateral collection in the event of insolvency

4 Risk management (continued)

c Credit risk (continued)

The framework for managing customer credit risk is approved by the Management of both the group and ProCredit Holding and set forth in policies and standards. The policies define, among other things, the responsibilities for managing credit risk, the principles for the organisation of lending business, the principles involved in lending operations, and the framework for the valuation of collateral for credit exposures. The standards define in more detail the group's lending operations with business clients and private clients and the range of credit products offered. They also set forth the rules governing restructuring, loan loss provisioning and write-offs. Thus, the policies and standards define risk-mitigating measures for the pre-disbursement phase (credit risk assessment) and the post-disbursement phase (regular monitoring of the financial situation and problem loan management). The credit risk profile of the group is assessed both on a local and ProCredit Holding level at least on a monthly basis, and more comprehensively on a quarterly basis.

The group divides its credit exposures into three client categories: small and medium business credit exposures and credit exposures to private clients. Small exposures are between EUR 50k and EUR 250k; medium exposures are above EUR 250k. The majority of medium exposures are for amounts below EUR 1 million. Depending on the client category to which the respective credit exposure is assigned, different credit risk assessment processes are applied. These processes differ from one another in terms of the following attributes: degree of segregation of duties, type of information that provides the basis for the credit analysis, criteria for credit decisions, and collateral requirements. A strict division of front and back office functions up to the management level is applied for risk-relevant credit exposures (over EUR 50k).

The experience of the group has shown that an appropriate credit risk assessment constitutes the most effective form of credit risk management. Credit decisions are based on an analysis of the financial situation of the client and an assessment of the creditworthiness of the client. All clients are regularly visited on-site to ensure an adequate consideration of their specific features and needs.

The credit decisions are all taken by a credit committee. Its members have approval limits that reflect their expertise and experience. All decisions on small and medium credit exposures are taken by credit committees at the bank's head office.

The group applies various instruments available to reduce the risk on individual transactions related to loans and advances to customers, including security in the form of physical assets and guarantees. The most frequently provided forms of collateral are mortgage of real estate and pledge on movables and also cash collateral. Collateral generally is not held over other financial assets. The distribution of the loans and advances to customers by type of collateral is presented in the table below:

Collateral held	31 Dec 2017	31 Dec 2016
Mortgage	54%	55%
Guaranties from EIF	20%	18%
Machines and vehicles	9%	10%
Cash collateral	3%	2%
Other types of collateral	14%	15%
Total	**100%**	**100%**

4 Risk management (continued)

c Credit risk (continued)

The group has disbursed loans to small and medium enterprises under the auspices of JEREMIE program (Joint European Resources for Micro to Medium Enterprises), which is a joint initiative launched by the European Commission and the European Investment Bank ("EIB") to improve access to finance for Micro, Small and Medium-sized Enterprises in the EU within the Structural Funds framework for the period 2007 – 2013. Two new programs for financing of SMEs were launched in 2016 jointly with the EIF – InnovFin SME Guarantee Facility and SME Initiative Guarantee Facility providing partial guarantee for the subloans disbursed under both programs. The total customers loan portfolio outstanding under the programs, in which the bank is partner with the EIF, were BGN 282,131 thousand as of end 2017 (2016: BGN 213,611 thousand).

The main part of the loan portfolio of ProCredit Bank is composed of exposures with regular monthly payments. This is why payment delays are a reliable indicator of increased credit risk. Consequently, one of the key indicators used by ProCredit Bank to assess the level of credit risk in the group is the portfolio at risk (PAR 30 and PAR 90). This is defined as the outstanding volume of credit exposures with one or more payments of interest or principal overdue by more than 30 or 90 days, respectively. When calculating this indicator, the total outstanding exposure towards a client is taken into consideration. Deductions for available collateral are not applied. The indicator is expressed as a percentage of the total gross loan portfolio. The quality of the loan portfolio is monitored based on this key indicator on an ongoing basis. At the end of 2017, PAR 30 stood at 2.4%, lower than the level reported for the end of 2016 (2.7%).

ProCredit Bank introduced a system of indicators for assessing the quality of the loan portfolio (AQI – Asset Quality Indicators) in 2016, as defined by the Group Credit Risk of ProCredit Holding. Some of them are early warning signs for potential increased risk, such as reduced turnovers and / or account balances, permanently highly utilized overdrafts and credit lines of customers where there is also a decline in bank turnover, as well as improper usage of the loan. Regular inspections are carried out regarding the change of ownership, address or activity of the borrowers, whether they have been declared insolvent or have distrains on their bank accounts.

Additionally, on a quarterly basis, the Risk Management Department prepares a report examining the bank's loan portfolio for concentration by economic sectors / sub-sectors and geographic regions as well as the portfolio quality trends in these economic sectors / sub-sectors. Also the bank regularly monitors changes in the external environment to assess their potential impact on its loan portfolio.

Once a higher risk of default is detected for a credit exposure, it is placed under intensified management. This centres on close communication with the client, identification of the source of higher credit default risk and close monitoring of the client's business activities. Decisions on the measures to reduce the credit default risk for individual credit exposures are taken by specialised Credit Committee on Restructuring. In addition, specialised recovery officers may be called in to support the intensified management of the credit exposure.

When a credit exposure reaches problem credit exposure status, recovery officers take over full responsibility for dealings with this client. The handover is based on factors such as insolvency and occurs after the loan has been in arrears for 90 days at the latest. Generally speaking, problem credit exposures are characterised as such if the bank has significant doubts about the ability of the client to comply with the contractual terms and conditions.

4 Risk management (continued)

c Credit risk (continued)

If necessary, recovery officers are supported by litigation officers (legal department) and/or specialists in the sale of assets or collateral. Collateral is always liquidated through sales to third parties. Repossessed property is sold at the highest possible price, typically via public auction.

As a principle, ProCredit Bank does not write off receivables from clients until it no longer expects to receive any further payments. As a rule, the more days that the client's payments are past due and the more doubtful the recoverability of the collateral, the lower the probability of further payments is. Additionally, the direct and indirect costs of managing credit exposures that have not been written off must be in proportion to the size of the outstanding exposure. Bearing these points in mind, the group writes off insignificant credit exposures (up to EUR 30k) earlier than significant ones

The group views the adequate provisioning of credit risk as a key strategic objective, which is achieved by making allowance for losses and impairment. In this context, a distinction is drawn between individually significant and individually insignificant credit exposures; the threshold is EUR 30,000.

	Loan portfolio (LP)	Allowance for impairment	PAR (> 30 days)	PAR as % of LP	PAR coverage ratio	Net write-offs	Net write-offs as % of LP
31 Dec 2017	1,444,808	(40,973)	34,915	2.4%	117.4%	1,857	0.1%
31 Dec 2016	1,251,556	(42,165)	34,262	2.7%	123.1%	(203)	0.0%

For all credit exposures that currently show no signs of impairment (standard exposures, including restructured exposures which do not show signs of impairment), portfolio-based allowances for impairment are made based on historical loss experience. This applies to both individually significant and individually insignificant credit exposures.

ProCredit Bank calculates lump-sum specific provisions for individually insignificant credit exposures in arrears more than 30 days. Respective provisioning rates are based on historic default rates. The amount of such provisions is determined on the basis of the number of days that the client's payments have been overdue.

Individually significant credit exposures are subject to individual monitoring. For such credit exposures, the bank performs an impairment test (specific provisions) once objective evidence exists that their quality has deteriorated. The main indicator of this is that the receivable is more than 30 days past due (PAR 30). However, credit exposures can show other signs of impairment as well. Typical examples are:

- breach of covenants or conditions, unless waived or modified by the bank
- initiation of legal proceedings by the bank
- initiation of bankruptcy proceedings
- any information on the customer's business or changes in the client's market environment that are having or will have a negative impact on the client's payment capacity

Based on signs of deterioration in the quality of the credit exposure, an impairment test is performed, applying the discounted cash flow method. In this context, expected future cash flows from realised collateral items as well as other realisable cash flows are taken into account. The level of loan loss provisions is determined by the difference between the book value of the credit exposure and the net present value of the expected future cash flows.

4 Risk management (continued)

c Credit risk (continued)

Loans and advances to customers by LLP types	**31 Dec 2017**	**31 Dec 2016**
Collectively assessed impaired exposures		
no arrears	715	1,024
1-30 days in arrears	235	297
31-90 days in arrears	2,527	2,675
91-180 days in arrears	1,022	843
over 180 days in arrears	1,130	748
Provision for impairment	(2,887)	(2,536)
Carrying amount	**2,742**	**3,051**
Individually assessed impaired exposure		
no arrears	7,808	10,489
1-30 days in arrears	3,215	3,226
31-90 days in arrears	3,296	1,097
91-180 days in arrears	2,596	1,231
over 180 days in arrears	23,196	26,412
Provision for impairment	(18,009)	(19,105)
Carrying amount	**22,102**	**23,350**
Individually assessed exposures with impairment triggers but no impairment loss		
no arrears	11,846	12,810
1-30 days in arrears	405	1,554
31-90 days in arrears	991	1,255
91-180 days in arrears	158	-
over 180 days in arrears	-	-
Provision for impairment	(377)	(538)
Carrying amount	**13,023**	**15,081**
Collectively assessed exposures which are not impaired		
no arrears	1,377,299	1,177,525
1-30 days in arrears	8,369	10,370
Provision for collectively assessed exposures	(19,700)	(19,986)
Carrying amount	**1,365,969**	**1,167,909**
Including with renegotiated terms	21,235	21,791
Total gross amount of loans and advances to customers	1,444,808	1,251,556
Total provision for impairment	(40,973)	(42,165)
Total carrying amount of loans and advances to customers	**1,403,835**	**1,209,391**

The loan portfolio is monitored continuously for possible risk-relevant developments with the aid of “reporting triggers”. These include past due credit exposures (PAR 30 and PAR 90), restructured credit exposures, written-off credit exposures and allowances for impairment on the loan portfolio. These indicators are analysed in the group’s Credit Risk Report and discussed by the Credit Risk Assessment Committee. In addition, exceptional events which could have an impact on large areas of the loan portfolio (common risk factors) are analysed. Limits could be imposed on risk exposures towards certain groups of clients, e.g. in specific sectors of the economy or geographical regions.

Concentration risk in the group is primarily minimised through the high degree of diversification stemming from lending to the core client groups (small and medium businesses) in various economic sectors. Geographically, the loans and advances to customers are predominantly disbursed to clients, which are Bulgarian residents.

4 Risk management (continued)

c Credit risk (continued)

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

Loan and advances to customers by business sectors	31 Dec 2017	in %	31 Dec 2016	in %
Agriculture	356,917	25%	330,238	26%
Trade	319,536	22%	288,422	24%
Industry and other production	301,224	21%	223,933	18%
Services	112,437	8%	73,138	6%
Transport	100,066	7%	92,572	7%
Construction	46,657	3%	46,046	4%
Accommodation and restaurants	49,906	3%	40,866	3%
Households	158,065	11%	156,341	12%
Total gross loans and advances	**1,444,808**	**100%**	**1,251,556**	**100%**

Loans to households include mortgage loans in the amount of BGN 135,822 thousand (2016: BGN 106,102 thousand).

ProCredit Group also limits the concentration risk in its portfolio as the disbursement of any large credit exposure (exceeding 10% of the regulatory capital) requires the approval of the ProCredit Holding Group Risk Management Committee. The largest credit exposure of the bank was 4% of the regulatory capital as of end 2017 (2016: 4%).

Loan and advances to customers by outstanding exposure amount	Business clients	Private clients	Total gross loan portfolio
As of 31 December 2017			
<= 50,000 EUR	109,628	42,046	151,674
>50,000 <= 250,000 EUR	407,695	25,547	433,242
> 250,000 EUR	859,892	-	859,892
Total	**1,377,215**	**67,593**	**1,444,808**

Loan and advances to customers by outstanding exposure amount	Business clients	Private clients	Total gross loan portfolio
As of 31 December 2016			
<= 50,000 EUR	135,773	39,028	174,801
>50,000 <= 250,000 EUR	412,097	11,793	423,890
> 250,000 EUR	652,415	450	652,865
Total gross loans and advances	**1,200,285**	**51,271**	**1,251,556**

Business loans include loans for business purposes (working capital or investments) disbursed to Small and Medium clients. Business loans include agricultural loans as well as business overdrafts and revolving loans. Loans to Private clients include consumer and housing loans as well as consumer overdrafts and credit card receivables.

4 Risk management (continued)

c Credit risk (continued)

Continuous training of the staff ensures that credit risk is properly evaluated whenever a loan is issued, and that credit exposures are closely observed throughout their lifetime and appropriate measures are taken in a timely manner. That is why the quality of the ProCredit Bank's loan portfolio is significantly higher than the sector average.

The group's client credit risk is regularly quantified in the risk-bearing capacity calculation using a credit risk model. Relevant stress scenarios are also used to determine the economic capital needed by the group to cover client credit risk in extremely negative circumstances.

Credit related commitments

The primary purpose of these instruments is to ensure that funds are available to a customer as required. Guarantees, which represent irrevocable assurance that the group will make the payments in the event that a customer cannot meet its obligations to third parties, carry the same credit risk as loans.

Commitments to extend credit represent unused portions of authorisations to extend credit in the form of loans and guarantees. With respect to credit risk on commitments to extend credit, the group is potentially exposed to loss in an amount equal to the total unused commitments. However, the likely amount of loss is less than the total commitments since commitments to extend credit are contingent upon customers maintaining specific credit standards.

d Counterparty risk (including issuer risk)

The group defines counterparty risk, including issuer risk, as the risk that a counterparty/issuer is unwilling or unable to fulfil its obligations on time or in full. Counterparty risk in the group mainly arises from keeping highly liquid assets for the purpose of mitigating liquidity risk. There is also structural exposure towards the BNB in the form of mandatory minimum reserves.

The framework for managing the counterparty risk is approved by the Management of the group and is specified in the respective policies and standards. These define counterparty risk, specify the responsibilities at bank level, and establish minimum requirements for managing, monitoring and reporting. Both the ALCO and the General Risk Assessment Committee are involved in decisions made with regard to counterparty risk.

The overarching counterparty risk management strategy is to invest the group's liquid assets safely and in a diversified manner. While ProCredit Bank tries to generate some income from these assets, the overriding objective is to ensure secure placement and timely availability – consequently risk considerations predominate. For this reason, the group only works with carefully selected reliable banks with high credit quality, performs placements for short terms (up to three months, but typically shorter) and use only a very limited number of simple financial instruments. Issuer risk is likewise managed according to these principles. The group is prohibited from engaging in speculative trading or proprietary trading. The impact of market price changes on the group is limited. The reasons are that the volume of securities is rather low and issuers are carefully selected based on conservative risk criteria.

4 Risk management (continued)

d Counterparty risk (including issuer risk) (continued)

Typically, counterparties are BNB, Bulgarian Government and commercial banks. The main types of exposure are account balances, short-maturity term deposits, highly liquid securities, and, on a very limited scale, simple derivative instruments for liquidity management and hedging purposes (particularly foreign currency forwards and swaps). The group's exposure to counterparty and issuer risk has been influenced in 2017 by placements in other ProCredit banks (particularly ProCredit Bank Germany and ProCredit Bank Serbia). The securities portfolio decreased due to maturing of government bonds held by the bank. The liquid assets other than physical cash of the bank were placed as follows:

Counterparty	31 Dec 2017	in %	31 Dec 2016	in %
BNB	147,312	32%	155,812	30%
Mandatory reserves	132,277	29%	111,006	21%
Others	15,035	3%	44,806	9%
Banking groups	288,320	62%	331,511	63%
OECD banks	288,320	62%	331,511	63%
local banks	-	-	-	-
Securities issued by Bulgarian Govt	28,729	6%	39,655	7%
Total	**464,361**	**100%**	**526,978**	**100%**

The table below presents an analysis of debt securities and banks placements by rating agency designation, based on the credit assessments of nominated External Credit Assessment Institutions:

As of December 2017

Rating	Debt securities, available for sale	Loans and advances to banks	Total
AA- to AA+	-	3	3
A- to A+	-	-	-
BBB- to BBB+	28,729	-	28,729
Unrated	-	288,317	288,317
Total	**28,729**	**288,320**	**317,049**

As of December 2016

Rating	Debt securities, available for sale	Loans and advances to banks	Total
AA- to AA+	9,323	3	9,326
A- to A+	-	5	5
BBB- to BBB+	30,332	48,745	79,077
Unrated	-	282,758	282,758
Total	**39,655**	**331,511**	**371,166**

For counterparty risk, the same definitions for "in arrears" and "impaired" apply in principle as for customer credit risk. Due to the careful selection of the counterparties, none of positions shown was in arrears nor showed any signs of impairment as of 31 December 2017. Accordingly, no allowance for impairment was set aside for them in 2017.

4 Risk management (continued)

d Counterparty risk (including issuer risk) (continued)

As with customer credit risk, the exposure towards counterparties/issuers is managed by a limit system. ProCredit Bank conclude transactions only with counterparties that have previously been carefully analysed and for which a limit has been approved. The total limit towards a non-OECD bank or banking group cannot exceed 10% of the ProCredit Bank's capital without prior additional approval from ProCredit Group ALCO or the ProCredit Group Risk Management Committee. For an OECD bank, the threshold is 25%. The typical maximum maturity of the term deposits is up to three months; longer maturities must be approved by ProCredit Group ALCO or the ProCredit Group Risk Management Committee. Approval is likewise required before any investments in securities. The group's counterparty risk is quantified and analysed regularly as part of the risk-bearing capacity calculation. When calculating the risk- and term-adjusted exposure, all exposures towards counterparties are taken into account.

e Market risk

Relevant market risks for the group are currency and interest rate risk. In accordance with the ProCredit group risk strategy, foreign currency risk and interest rate risk may not be incurred for the purposes of speculative or proprietary trading. Therefore, ProCredit Bank is strictly non-trading book credit institution within the terms of the Basel Capital Accord. The group closes currency positions to the extent possible. Interest rate risk positions are always only taken within established limits. Foreign currency and interest rate derivatives are used exclusively for hedging or liquidity purposes. The group does not apply hedge accounting as defined by IAS 39.

Foreign currency risk

Since ProCredit Bank is a non-trading book institution and has no commodity positions, foreign currency risk is the only risk of those classified as market price risks according to article 351 of Regulation No. 575/2013 of the European Parliament and of the Council of 26 June 2013 on the prudential requirements for credit institutions and investment firms and amending EU regulation no 648/2012 (Regulation 575/2013) that is relevant for regulatory capital requirements. The foreign currency risk is defined as the risk that the institution incurs losses or is negatively affected by exchange rate fluctuations.

The framework for managing the foreign currency risk is approved by the Management of the group and is specified in the respective policies and standards. These define foreign currency risk, specify the responsibilities at bank level, and establish minimum requirements for managing, monitoring and reporting. Both the ALCO and the General Risk Assessment Committee are involved in decisions made with regard to counterparty risk.

The P&L effect of foreign currency risk occurs when the volumes of its assets and liabilities denominated in foreign currencies do not match and the exchange rates move unfavourably. The key risk indicator that captures the balance sheet discrepancy for each currency is the open currency position (OCP). The total OCP is calculated as the sum of the absolute values of the individual currency positions and is limited to 10% of the bank's capital, unless deviation from this limit has been approved by the ProCredit Group ALCO or ProCredit Group Risk Management Committee. A threshold of 7.5% of the ProCredit Bank's capital has been defined as an early warning indicator for the total OCP, and ±5% for each individual currency OCP.

4 Risk management (continued)

e Market risk (continued)

The P&L effect arising from OCPs is also measured regularly when calculating the risk-bearing capacity of each individual ProCredit bank. The calculation is based on a Value at Risk (VaR)-type analysis of the OCPs considering historically extreme exchange rate volatilities during the past seven years. In addition, regular stress tests are conducted for the risk arising from OCPs. The table below summarizes the bank's exposure to foreign currency exchange rate risk.

As of 31 December 2017	**BGN**	**EUR**	**USD**	**Other**	**Total**
Assets					
Cash and cash equivalents	175,197	15,831	994	55	192,077
Loans and advances to banks	-	241,627	40,801	5,892	288,320
Available-for-sale financial assets	27,352	2,143	3,097	-	32,592
Loans and advances to customers	745,473	697,492	1,843	-	1,444,808
Allowance for losses on loans and advances to customers	(17,012)	(23,931)	(30)	-	(40,973)
Property, plant and equipment	41,295	-	-	-	41,295
Intangible assets	3,780	-	-	-	3,780
Deferred income tax assets	558	-	-	-	558
Other assets	10,912	2,032	-	-	12,944
Total assets	**987,555**	**935,194**	**46,705**	**5,947**	**1,975,401**
Liabilities					
Liabilities to banks	30,057	53,801	-	-	83,858
Liabilities to customers	949,983	460,527	49,317	6,318	1,466,145
Liabilities to institutions	-	200,815	-	-	200,815
Other liabilities	3,924	2,881	165	2	6,972
Provisions	569	-	-	-	569
Current tax liabilities	373	-	-	-	373
Total liabilities	**984,906**	**718,024**	**49,482**	**6,320**	**1,758,732**
Net balance sheet position	**2,649**	**217,170**	**(2,777)**	**(373)**	**216,669**
Credit commitments (note 30)	193,961	73,415	979	-	268,355
Open spot transactions	3,325	132	(3,153)	(294)	10
As of 31 December 2016	**BGN**	**EUR**	**USD**	**Other**	**Total**
Total assets	825,211	982,008	45,424	9,572	1,862,215
Total liabilities	824,634	746,986	46,531	9,479	1,627,630
Net balance sheet position	**577**	**235,022**	**(1,107)**	**93**	**234,585**
Credit commitments (note 30)	200,727	62,617	5,912	-	269,256
Open spot transactions	1,956	(645)	(1,362)	59	8

4 Risk management (continued)

e Market risk (continued)

Interest rate risk in the banking book

Interest rate risk is the risk of incurring losses driven by changes in market interest rates and arises from structural differences between the repricing maturities of assets and liabilities.

The framework for managing the interest rate risk is approved by the Management of the group and is specified in the respective policies and standards. These define interest rate risk, specify the responsibilities at bank level, and establish minimum requirements for managing, monitoring and reporting. General Risk Assessment Committee is responsible for all key decisions regarding interest rate risk management, and this committee analyses, at least quarterly, the interest rate risk profile of the group. In addition, each ALCO reviews any interest rate-sensitive transaction with a notional amount exceeding 5% of the bank's capital, and which has a maturity to the next repricing longer than six months. This is designed to avoid the conclusion of transactions that could have a negative impact on the interest rate risk of the institution.

In order to maintain an acceptable level of interest rate risk even when loans are disbursed with longer maturities ProCredit Bank offers its clients variable-rate loans, and also issues loans with shorter terms. In this way, the repricing maturities of assets can be matched to the repricing maturity of liabilities, even when liabilities have shorter maturities than loans. In order to grant variable-rate loans in a transparent manner, the bank uses a publicly available interest rate as a benchmark when adjusting the interest rates and communicates this clearly to the client at the time of disbursement.

The group's approach used to measure, monitor and limit interest rate risk is based on repricing gap analyses. The assets and liabilities are distributed across time buckets according to the terms of the underlying contracts. Sight deposits are included in the gap analyses as non-interest bearing whereas saving accounts are presented in the time bucket up to one month. Included in the table are the group's assets and liabilities at carrying amounts, categorised by the earlier of contractual repricing or maturity dates. Loans to customers that are non-interest bearing comprise exposures with worsened credit quality.

4 Risk management (continued)

e Market risk (continued)

As of 31 December 2017	Up to 1 month	1 – 3 months	3 – 12 months	1 – 5 years	Over 5 years	Non-interest bearing	Total
Assets							
Cash and cash equivalents	5,646	-	-	-	-	186,431	192,077
Loans and advances to banks	260,822	19,558	-	-	-	7,940	288,320
Available-for-sale financial assets	13,273	8	2,072	13,375	-	3,864	32,592
Loans and advances to customers	185,909	436,557	723,962	45,521	23,714	29,145	1,444,808
Allowance for losses on loans and advances to customers	(3,057)	(7,410)	(12,713)	(2,439)	(592)	(14,762)	(40,973)
Property, plant and equipment	-	-	-	-	-	41,295	41,295
Intangible assets	-	-	-	-	-	3,780	3,780
Deferred income tax assets	-	-	-	-	-	558	558
Other assets	-	-	-	-	-	12,944	12,944
Total assets	**462,593**	**448,713**	**713,321**	**56,457**	**23,122**	**271,195**	**1,975,401**
Liabilities							
Liabilities to banks	30,027	-	8,672	44,984	-	175	83,858
Liabilities to customers	334,325	87,129	263,649	5,919	-	775,123	1,466,145
Liabilities to institutions	-	93,275	39,086	68,454	-	-	200,815
Other liabilities	-	-	-	-	-	6,972	6,972
Provisions	-	-	-	-	-	569	569
Current tax liabilities	-	-	-	-	-	373	373
Total liabilities	**364,352**	**180,404**	**311,407**	**119,357**	**-**	**783,212**	**1,758,732**
Interest sensitivity gap	**98,241**	**268,309**	**401,914**	**(62,900)**	**23,122**	**(512,017)**	**216,669**

As of 31 December 2016	Up to 1 month	1 – 3 months	3 – 12 months	1 – 5 years	Over 5 years	Non-interest bearing	Total
Total assets	439,770	387,380	673,604	73,785	19,045	268,631	1,862,215
Total liabilities	384,480	223,413	270,491	10,757	-	738,489	1,627,630
Interest sensitivity gap	**55,290**	**163,967**	**403,113**	**63,028**	**19,045**	**(469,858)**	**234,585**

The economic value impact is a key indicator for managing interest rate risk, and measures the potential economic value change on all assets and liabilities determined by a sudden detrimental change in interest rates. For EUR or USD it is assumed a parallel shift of the interest rate curve by +/- 200 basis points in line with the Basel Capital Accord. For local currencies the magnitude of the shocks is derived using a VaR-type methodology taking into consideration interest rate volatilities over the past seven years.

The potential economic impact when simulating a simultaneous detrimental (upward or downward) interest rate shock across all currencies must not exceed 10% of the group's capital, unless approved by the ProCredit Group Risk Management Committee; the early warning indicator for each currency is set at 5%.

4 Risk management (continued)

e Market risk (continued)

A second key indicator measures the potential impact of interest rate shocks on the expected earnings of the group (P&L effect) over a period of three months. This risk measure indicates how the income statement may be influenced by interest rate risk under a short-term perspective and is deemed significant if it exceeds 1% of the bank's capital. The table below represents stress test scenario that shows the effect over the bank's net income for the year caused by an average historical change in 6 month Euribor.

Currency	31 Dec 2017		31 Dec 2016	
	12-month interest earnings	Interest rate shock Basis points	12-month interest earnings	Interest rate shock Basis points
BGN	120	+0.03%	324	+0.10%
EUR	93	+0.03%	266	+0.10%
USD	213	+0.03%	590	+0.10%
Total amount	**426**		**1,180**	

The group exposure to interest rate risk is quantified and analysed quarterly in the context of the risk bearing capacity calculation.

f Liquidity and funding risk

Liquidity and funding risk addresses the ProCredit Bank's short- and long-term ability to meet its financial obligations in a complete and timely manner.

The framework for managing ProCredit Bank's liquidity and funding risk is approved by the Management of the group and is specified in the respective policies and standards. These define liquidity risk, specify the responsibilities at bank level, and establish minimum requirements for managing, monitoring and reporting. The ALCO is responsible for all key operational decisions regarding liquidity management. Selected liquidity risk indicators are reported and presented each month in detail to the ProCredit Group Risk Management Committee.

Liquidity risk is limited by the fact that the group primarily issues loans which feature monthly repayments and are financed largely by local attracted funds from clients. The deposit-taking operations focus on our target group of business clients and savers, with whom strong relationships are established.

Liquidity risk is measured using, among other instruments, a liquidity gap analysis, and limit the risk based on the liquidity indicator "Expected assets in time bucket up to 30 days / expected liabilities in time bucket up to 30 days >= 1", which requires the institution to hold sufficient liquidity for the next 30 days. In addition, early warning indicators are defined and are monitored using reporting triggers. If the indicators go above or, as the case may be, fall below the reporting triggers, the reasons must be explained, and if appropriate, mitigating measures must be decided by the bank's ALCO and communicated to ProCredit Group Financial Risk Management. A key indicator is the highly liquid assets indicator, which determines that the banks must always hold sufficient highly liquid assets to be able to pay out at least 20% of all customer deposits at all times. The indicator stood at 31.8% as of end 2017 (2016: 37.7%).

4 Risk management (continued)

f Liquidity and funding risk (continued)

In addition, as part of risk management, market-related and combined stress tests are conducted monthly and ad hoc to make sure that the group keeps sufficient liquid funds to meet its obligations, even in difficult times. Moreover, ProCredit Bank has a liquidity contingency plan. If unexpected circumstances arise and an individual institution from ProCredit group proves not to have sufficient liquid funds, ProCredit Holding would step in as a "lender of last resort". ProCredit Holding keeps an adequate liquidity reserve available for this purpose.

The liquidity of the group is managed on a daily basis by the respective responsible units (i.e. treasury), based on the ALCO-approved cash flow projections which take account of planned business developments and liquidity indicators, and is monitored by risk management and ALCO.

The following table shows the cash flows of the balance sheet assets and liabilities of the group according to their remaining contractual maturities. The remaining contractual maturity is defined as the period between the balance sheet date and the contractually agreed due date of the asset or liability, or the due date of a partial payment under the contract for an asset or liability.

Maturities of assets and liabilities

As of 31 December 2017	**Up to 1 month**	**1 – 3 months**	**3 – 12 months**	**1 – 5 years**	**Over 5 years**	**Total**
Assets						
Cash and cash equivalents	192,077	-	-	-	-	192,077
Loans and advances to banks	268,763	19,557	-	-	-	288,320
Available-for-sale financial assets	13,273	8	2,072	13,376	3,863	32,592
Loans and advances to customers	33,915	55,859	318,965	733,830	302,239	1,444,808
Allowance for losses on loans and advances to customers	(731)	(844)	(5,706)	(11,833)	(21,859)	(40,973)
Property, plant and equipment	-	-	-	-	41,295	41,295
Intangible assets	-	-	-	-	3,780	3,780
Deferred income tax assets	-	-	558	-	-	558
Other assets	3,165	-	-	-	9,779	12,944
Total assets	**510,462**	**74,580**	**315,889**	**735,373**	**339,097**	**1,975,401**
Liabilities						
Liabilities to banks	30,248	85	387	47,108	6,030	83,858
Liabilities to customers	1,103,297	88,927	267,367	5,921	633	1,466,145
Liabilities to institutions	5,880	144	11,853	173,421	9,517	200,815
Other liabilities	6,507	-	-	-	465	6,972
Provisions	569	-	-	-	-	569
Current tax liabilities	-	373	-	-	-	373
Total liabilities	**1,146,501**	**89,529**	**279,607**	**226,450**	**16,645**	**1,758,732**
Net liquidity gap	**(636,039)**	**(14,949)**	**36,282**	**508,923**	**322,452**	**216,669**

As of 31 December 2016	**Up to 1 month**	**1 – 3 months**	**3 – 12 months**	**1 – 5 years**	**Over 5 years**	**Total**
Total assets	490,288	106,362	307,384	667,366	290,815	1,862,215
Total liabilities	1,125,611	105,539	279,290	94,112	23,078	1,627,630
Net liquidity gap	**(635,323)**	**823**	**28,094**	**573,254**	**267,737**	**234,585**

4 Risk management (continued)

f Liquidity and funding risk (continued)

Liabilities to customers with maturity up to 1 month include all sight deposits amounting to BGN 756,973 thousand (2016: BGN 724,985 thousand). The group's management expects that these funds will not be withdrawn at the same time or within the period in which they are reflected. Additionally, an analysis of depositors' behaviour revealed that 86% of term deposits at maturity date were not withdrawn but automatically renegotiated under the similar terms and conditions.

The following table shows the undiscounted cash flows of the financial assets and financial liabilities of the group according to their remaining contractual maturities.

Maturity analysis for financial assets and financial liabilities

As of 31 December 2017	Up to 1 month	1 – 3 months	3 – 12 months	1 – 5 years	Over 5 years	Total	Total carrying amount
Cash and cash equivalents	192,078	-	-	-	-	192,078	192,078
Loans and advances to banks	268,763	19,553	-	-	-	288,316	288,320
Financial assets available for sale	13,310	11	2,318	13,531	-	29,170	32,592
Loans and advances to customers	33,624	62,346	344,577	797,753	325,474	1,563,774	1,444,808
Total financial assets	**507,775**	**81,910**	**346,895**	**811,284**	**325,474**	**2,073,338**	**1,957,798**
Liabilities to banks	30,261	113	1,017	48,291	6,207	85,889	83,857
Liabilities to customers	1,103,418	88,944	267,928	6,007	635	1,466,932	1,466,145
Other borrowed funds	5,880	205	73,264	114,388	9,517	203,254	200,816
Total financial liabilities	**1,139,559**	**89,262**	**342,209**	**168,686**	**16,359**	**1,756,075**	**1,750,818**

As of 31 December 2016	Up to 1 month	1 – 3 months	3 – 12 months	1 – 5 years	Over 5 years	Total	Total carrying amount
Cash and cash equivalents	211,268	-	-	-	-	211,268	211,268
Loans and advances to banks	245,377	39,117	47,177	-	-	331,671	331,511
Financial assets available for sale	1,314	9,347	420	29,753	-	40,834	42,835
Loans and advances to customers	29,481	65,795	293,026	716,780	264,507	1,369,589	1,251,556
Total financial assets	**487,440**	**114,259**	**340,623**	**746,533**	**264,507**	**1,953,362**	**1,837,170**
Liabilities to banks	15,862	20,108	6,562	13,788	7,028	63,348	61,943
Liabilities to customers	921,876	65,561	258,195	73	669	1,246,374	1,245,779
Other borrowed funds	176,025	19,615	21,087	82,025	15,203	313,955	313,212
Total financial liabilities	**1,113,763**	**105,284**	**285,844**	**95,886**	**22,900**	**1,623,677**	**1,620,934**

Funding risk is the danger that additional funding cannot be obtained, or can only be obtained at significantly higher costs. It therefore covers parts of the non-systemic effect of interest rate changes. This risk is mitigated by the fact that the group finances its lending operations primarily through attracted funds from clients, supplemented by long-term credit lines from international financial institutions or other ProCredit group entities. ProCredit Bank makes little use of interbank and financial markets.

The group manages measures and limits funding risk through business planning, maturity gap analysis and several indicators. The funding needs, identified in the business planning process, are monitored and regularly reviewed. ALCO monitors the progress of all significant individual transactions with external funding providers, especially international financial institutions (IFIs). An important indicator for limiting funding risk is the deposit concentration indicator. This is defined as the share of the ten largest depositors relative to the bank's total deposit base, which should not exceed 20% (it stood at 9% as of end 2017). Additionally, the level of funding from the interbank market is restricted to a low level.

4 Risk management (continued)

g Operational risk management

The group defines operational risk as the risk of loss resulting from inadequate or failed internal processes, people and systems and/or external events. This definition includes legal risk as well as reputational risk. Dedicated policies on operational risk management, fraud prevention, information security and outsourcing have been implemented, following approval by the Management and are reviewed annually. The principles outlined in these documents have been designed to effectively manage the group's operational and fraud risk exposure and they are in compliance with the Basel Capital Accord requirements for the "standardised approach" for operational risk.

The bank has an assigned operational risk manager to ensure the effective implementation of the operational and fraud risk management framework within the institution. In addition the Operational Risk Management Committee ("ORAC") serves as the decision-making body for operational risk matters A centralised and decentralised reporting procedure ensures that the Management as well as other members of the ORAC receive regular comprehensive reports on operational risks to serve as a basis for their decisions.

The operational risk management process consists of the identification, evaluation, treatment, monitoring, communication and documentation, and follow-up of operational and fraud risks. The main tools utilised to manage these risks are the Risk Event Database, Annual Risk Assessments, Key Risk Indicators and New Risk Approvals.

The Risk Event Database ("RED") is a tool developed to ensure that all operational risk events identified in the group are documented, analysed and communicated effectively. As opposed to ex-post analysis of risk events from RED, the Annual Risk Assessments are a systematic way of identifying and evaluating material risks in order to confirm the adequacy of the control environment. Key Risk Indicators ("KRI") are used as indicators of elevated fraud risk in specific areas of banking operations or specific branch locations that could be used by a potential fraudster. These indicators are analysed regularly and where needed preventive measures are agreed on. To complete the picture of operational risk, new products, processes and instruments need to be analysed to identify and manage potential risks before implementation. This is ensured by the New Risk Approval (NRA) process.

h Risks arising from money laundering, terrorist financing and other acts punishable by law

Ethical behaviour is an integral part of the values-oriented business model of all ProCredit banks. The prevention of money laundering, terrorist financing and fraud are a key component of the bank's self-perception. ProCredit Bank does not tolerate any fraudulent activity or any other questionable behaviour from either their clients or their own employees.

The group is in full compliance with all national regulatory requirements concerning the prevention of money laundering and terrorist financing. As the ProCredit group is supervised by the German Federal Financial Supervisory Authority (BaFin), ProCredit Bank has also implemented the requirements stipulated by the German Money Laundering Act. The Code of Conduct and Exclusion List constitute the core rules and regulations that all employees of the group are obliged to observe. Certain guidelines (e.g. AML Policy and Fraud Prevention Policy) specify how these basic rules are to be implemented in practice.

4 Risk management (continued)

h Risks arising from money laundering, terrorist financing and other acts punishable by law (continued)

Besides identifying all contracting parties and clarifying the purpose of the business relationship, "knowing the customer" for ProCredit Bank always also entails identifying the beneficial owner of all funds that are managed in customer accounts. Beneficial owners are natural persons who substantially profit from a business structure, even if they are not personally in evidence during our business relationship with a client. Without exception, the group identifies and screens all persons who could prove to be beneficial owners. In addition, the group uses specialised software to identify payments that give cause for suspicion of money laundering, terrorist financing or fraud. Anti-money laundering officers work closely with the responsible law enforcement authorities and report regularly to the ProCredit Group AML Officer at ProCredit Holding.

i Capital management

At no time may ProCredit Bank incurs greater risks than it is able to bear. This principle is implemented using different indicators for which early warning indicators and limits have been established. The indicators include capital adequacy calculations in accordance to the applicable legislation (i.e. Regulation 575/2013 of the European Parliament and the Council) and calculation of Internal Capital Adequacy within the Internal Capital Adequacy Assessment Process (ICAAP).

The capital management of the group has the following objectives:

- compliance with external capital requirements
- compliance with the internally defined minimum capital adequacy requirements
- support for the group in implementing its plans for continued growth while following its business strategy as a house bank for small and medium-sized businesses.

The capital management of ProCredit Banks is governed by specific policies, and monitored on a monthly basis by the Management.

Internal Capital Adequacy Assessment Process

The Internal Capital Adequacy Assessment Process is a key element of risk management. The adequacy of internal capital entails defining the risk-bearing capacity of the group. The current capital resources are compared to the capital needs, which are derived from the risk profile and risk exposure, in order to guarantee the sufficiency of the capital resources at any moment. This is a continuous process which provides clarity on capital requirements and exposure to material risks.

The methods used to calculate the amount of economic capital required to cover the different risks the group is exposed to are based on statistical models, provided that appropriate models are available. Extreme scenarios, some of them historically observed in individual countries of operation, are applied to the group in its entirety to test its ability to withstand such shocks, both in individual risk areas and in combination. The guiding principle for the risk-bearing capacity calculations is that the group is able to withstand shock scenarios without endangering depositors and other providers of funding. The crisis years 2009 and 2010 underscored, firstly, the necessity for a conservative approach towards capital management, and secondly, the developments during that time proved the strength of the group in dealing with a very difficult economic environment.

4 Risk management (continued)

i Capital management (continued)

The approach adopted for management and monitoring of the Internal Capital Adequacy Assessment Process is the "gone concern" approach. Assessment is made of the outcomes from the occurrence of an extreme operational environment, including situations which have not occurred as historical data and outcomes of various stress scenarios. Under the "gone concern" approach, a sufficient buffer is included to cover risk positions which are either not considered essential, or cannot be measured and have the potential for loss.

The material risks, as well as the applicable limits for each risk, for which the required capital is calculated, reflect the risk profile of ProCredit Bank, and are subject to annual revisions. These risks are: credit risk, counterparty risk (including issuer risk), interest rate risk, FX risk and operational risk.

Within ICAAP ProCredit Bank compares the calculated economic capital needed for the various risks to the available capital. For the purposes of ICAAP, the available capital is considered as risk-taking potential (RTP) and comprises the equity as per the financial statements, minus the intangible assets and the deferred tax assets plus Tier 2 capital. The resources available to cover risks (RAtCR) are calculated as 60% of the RTP. Only RAtCR are considered when setting the limits for each risk category. Thus a buffer of 40% of the RTP is available to cover possible shortcomings of the applied models and unfavourable effects, which can be associated with risks which have not been explicitly included in ICAAP calculation. The table below gives more details on the calculated internal capital within the ICAAP as well as on the risk taking potential:

As of 31 Dec 2017

Material risks	**Limit (% of the RTP)**	**Limit (amount)**	**Limit used (amount)**	**Limit used (%)**
Credit risk	33.0%	71,952	34,684	15.9%
Counterparty risk	5.0%	10,902	849	0.4%
FX risk	2.0%	4,361	40	0.0%
Interest rate risk	10.0%	21,804	8,236	3.8%
Operational risk	10.0%	21,804	10,623	4.9%
Resources available to cover risks (RAtCR) (limited at 60% of RTP)	**60.0%**	**130,823**	**54,432**	**25.0%**
Risk-taking potential (RTP)	**-**	**218,035**	**-**	**-**

Regulatory capital adequacy

Since 1 January 2014, the Basel III requirements, implemented in Bulgaria through Capital Requirements Directive IV and Regulation 575/2013 CRR, have been binding for the group. As per Art. 92 of Regulation 575/2013, the minimum capital requirement for the overall capital adequacy ratio is 8% of the total risk exposure. Added to this requirement are the capital buffers, which the BNB demands that the banks maintain as per Regulation No. 8 on the capital buffers of banks. They are:

- capital conservation buffer in the form of Common Equity Tier 1 equal to 2.5% of total risk exposure;
- systemic risk buffer in the form of Common Equity Tier 1 capital equal to 3.0% of the total risk exposure.

4 Risk management (continued)

i Capital management (continued)

After adding the capital buffers to the capital requirements, the minimum requirement amounts to 13.5%. The bank's internal capital management policy sets a stricter limit for the total capital adequacy capital ratio with a reporting trigger of 15.5% and a limit of 14.5%.

When defining the capital requirements for the purposes of calculation of capital adequacy as per Regulation 575/2013, the bank adheres to the following:

- capital requirements for credit risk and counterparty risk – Standardised approach as per Part Three, Section II, Chapter 2 of Regulation 575/2013 is used for exposure classes.
- capital requirements for operational risk – Standardized approach as per part Three, Section III, Chapter 3 of Regulation 575/2013. Compared to the regulatory capital requirements for operational risk, which amount to BGN 17.9 million, the average annual loss according to data recorded in the Risk Event Database in the last three years amounted to BGN 160 thousand.

As ProCredit Bank is a non-trading book institution, which moreover does not engage in transactions involving commodities, foreign currency risk is the only market risk to be considered. However, ProCredit Bank does not calculate a capital requirement for currency risk, as the overall net foreign currency position (excluding EUR) is virtually kept very close to 0% of the capital (as of 31.12.2017 the values was 0.16%, which is less than minimum threshold of 2% according to Regulation 575/2013).

The regulatory capital ratios are calculated by dividing the capital by the amount of the risk-weighted assets; when calculating each ratio, only the respective capital components are considered (of the Common Equity Tier 1 capital, of the Tier 1 capital and of the overall capital adequacy). The table below shows information about the regulatory capital ratios:

	2017	2016
Regulatory capital		
Common Equity Tier 1 capital	177,552	174,661
Total regulatory capital	**177,552**	**174,661**
Risk Weighted Assets		
Risk Weighted Assets for Credit Risk	870,244	819,715
Risk Weighted Assets for Operational Risk	132,789	135,754
Total Risk Weighted Assets	**1,003,033**	**955,469**
Capital ratios		
Common Equity Tier 1 capital	17.7%	18.3%
Tier 1 capital	17.7%	18.3%
Total capital	17.7%	18.3%

The Common Equity Tier 1 capital of the group is composed of subscribed capital and reserves, whereas deductions are made for intangible assets. ProCredit Bank plans growth of risk-weighted assets to be accompanied solely by an increase in Tier 1 capital.

5 Fair values of financial assets and liabilities

The following table summarises the carrying amounts and fair values the financial assets and liabilities in the group's statement of financial position, distributed in the respective hierarchical levels in accordance to the methods used for determining of the fair value.

As of 31 December 2017				**Fair value hierarchy**		
Financial assets	**Category**	**Carrying value**	**Fair value**	**Level 1**	**Level 2**	**Level 3**
Cash and cash equivalents	AFV	192,077	192,077	44,765	147,312	-
Loans and advances to banks	LaR	288,320	288,320	-	288,320	-
Loans and advances to customers	LaR	1,444,808	1,483,090	-	-	1,483,090
AFS financial assets	AFS	32,592	32,592	31,826	-	766
Total		**1,957,797**	**1,996,079**	**76,591**	**435,632**	**1,483,856**

Financial liabilities	**Category**	**Carrying value**	**Fair value**	**Level 1**	**Level 2**	**Level 3**
Liabilities to banks	AC	83,857	83,982	-	30,174	53,808
Liabilities to customers	AC	1,466,145	1,466,126	-	1,073,612	392,514
Liabilities to institutions	AC	200,815	201,190	-	-	201,190
Total		**1,750,817**	**1,751,298**	**-**	**1,103,786**	**647,512**

As of 31 December 2016				**Fair value hierarchy**		
Financial assets	**Category**	**Carrying value**	**Fair value**	**Level 1**	**Level 2**	**Level 3**
Cash and cash equivalents	AFV	211,268	211,268	55,455	155,813	-
Loans and advances to banks	LaR	331,511	331,511	-	331,511	-
Loans and advances to customers	LaR	1,251,556	1,289,838	-	-	1,289,838
AFS financial assets	AFS	42,835	42,835	42,069	-	766
Total		**1,837,170**	**1,875,452**	**97,524**	**487,324**	**1,290,604**

Financial liabilities	**Category**	**Carrying value**	**Fair value**	**Level 1**	**Level 2**	**Level 3**
Liabilities to banks	AC	61,943	61,986	-	45,197	16,789
Liabilities to customers	AC	1,245,779	1,245,946	-	877,731	368,215
Liabilities to institutions	AC	313,212	313,706	-	-	313,706
Total		**1,620,934**	**1,621,638**		**922,928**	**698,710**

* categories: AFV - At Fair value; LaR - Loans and Receivables, AFS - Available-for-sale; AC - Amortised cost

(i) Cash and cash equivalents

The item "cash and cash equivalents" includes cash at hand and balances at central banks including mandatory reserve disclosed under note 15. The fair value of these assets matches their carrying amount.

(ii) Loans and advances to banks

Loans and advances to banks include inter-bank placements. The fair value of floating rate placements and overnight deposits is their carrying amount. The estimated fair value of fixed interest bearing deposits is based on discounted cash flows using prevailing money-market interest rates for debts with similar credit risk and remaining maturity.

(iii) Available-for-sale financial assets

The bank's portfolio of government securities is carried at fair value using the Level 1 inputs that are quoted market prices (unadjusted) in active markets for identical instruments. A small part of AfS assets includes equity securities where observable market prices are not available (SWIFT and Borika-Bankservice shares). These instruments are carried at cost.

5 Fair values of financial assets and liabilities (continued)

(iv) Loans and advances to customers

Loans and advances are net of provision for impairment. The fair value of loans and advances represents the discounted amount of estimated future cash flows using the interest rates currently offered by the bank for similar risk and maturity. Difference in fair values and carrying amounts represents the changes in the current market interest rates. Fair value incorporates expected future losses, while amortized cost and related impairment include only incurred losses at the statement of financial position date.

(v) Financial liabilities

The fair value of deposits with no stated maturity, which includes non-interest-bearing deposits, is the amount repayable on demand. The estimated fair value of fixed interest-bearing deposits and other borrowings without quoted market price is based on discounted cash flows using interest rates for similar risk and maturity.

If observable market rates are not available to determine the fair value of financial liabilities measured at amortised cost, ProCredit Group Treasury rates are used as an input for a discounted cash flow model. These are presented as level 3 input factors. ProCredit Group Treasury rates are determined taking into consideration the cost of capital depending on currencies and maturities plus a risk margin that depends on an internal risk rating for each institution within the ProCredit group (incl. ProCredit Bank (Bulgaria) EAD). Internal rates are regularly compared to those applied for third party transactions and are therefore in compliance with an orderly transaction between market participants at the measurement date under current market conditions.

Fair values of repossessed and investment properties (note 22) are established on the basis of internal calculations. The group considers the following valuation techniques:

- Cost approach. It considers the current replacement costs of building the property, including the cost of transportation, installation and start-up.
- Income approach. It considers the present value of the net cash flows expected to be generated from the facility, taking into account the planned EBITDA growth rate and budgeted capital expenditure growth rate; the expected net cash flows are discounted using a risk-adjusted discount rate.
- Sales comparison approach. It considers direct comparison with the offered prices of similar properties.

6 Net interest income

	2017	2016
Interest and similar income		
Loans and advances to customers	62,065	69,601
Available-for-sale financial assets	181	341
Loans and advances to banks	281	45
Total interest and similar income	**62,527**	**69,987**
Interest and similar expenses		
Liabilities to customers	1,399	2,213
Liabilities to banks and international financial institutions	1,832	1,690
Subordinated debt	-	-
Total interest and similar expenses	**3,231**	**3,903**
Net interest income	**59,296**	**66,084**

Included in “Interest income from loans and advances to customers” for 2017 is BGN 1,000 thousand of accrued interest on impaired loans (2016: BGN 1,331 thousand).

7 Allowance for impairment losses on loans and advances

	2017	2016
Increase of impairment charge	18,723	22,087
Release of impairment charge	(16,135)	(12,757)
Recovery of written-off loans	(2,049)	(5,984)
Direct write-offs	126	-
Allowance for impairment losses on loans and advances	**665**	**3,346**

The total impairment charge comprises the following entries:

	2017	2016
Specific impairment	10,424	8,247
Allowance for individually insignificant impaired loans	3,447	3,160
Allowance for collectively assessed loans	4,852	10,680
Increase of impairment charge	**18,723**	**22,087**

There is no risk provisioning on loans and advances to banks, as historically no defaults have been recorded and there is currently no objective evidence of impairment.

8 Net fee and commission income

	2017	2016
Fee and commission income		
Opening and account maintenance fees	10,372	5,615
Payment transfers and transactions	4,622	5,681
Debit/credit cards	3,280	3,484
Insurance fees	1,237	934
Loan management	1,138	1,483
Cash operations	750	946
Letters of credit and guarantees	463	636
Others	146	320
Total fee and commission income	**22,008**	**19,099**

8 Net fee and commission income (continued)

	2017	2016
Fee and commission expense		
Debit/credit cards	955	896
Correspondent accounts	706	643
Others	317	29
Total fee and commission expense	**1,978**	**1,568**
Net fee and commission income	**20,030**	**17,531**

9 Result from foreign exchange transactions

	2017	2016
Currency transactions	6,903	6,056
Net gains and losses from revaluation	425	171
Total result from foreign exchange transactions	**7,328**	**6,227**

10 Net result from available-for-sale financial assets

	2017	2016
Gains/(losses) from disposal of AFS securities	(72)	7,292
Total net result from available-for-sale financial assets	**(72)**	**7,292**

11 Net other operating income

	2017	2016
Other operating income		
Income from sale of own property	(14)	117
Income from sale of repossessed property	182	224
Dividends from AFS securities	222	90
Income from non-financial services	642	694
Other operating income	1,718	396
Total other operating income	**2,750**	**1,521**
Other operating expenses		
Impairment of repossessed property	2,970	2,982
Other expenses related to repossessed property	224	405
Other operating expenses	37	397
Total other operating expenses	**3,231**	**3,784**
Net other operating income	**(481)**	**(2,263)**

“Dividends from available-for-sale financial assets” includes the dividend received by entities in which the bank has non-controlling interest.

12 Personnel expenses

	2017	2016
Salary expenses	14,949	15,556
Pension costs	970	998
Other social security costs	1,305	1,457
Other employee costs	31	9
Total personnel expenses	**17,255**	**18,020**

13 Administrative expenses

	2017	2016
Payments to Deposit Insurance Fund and Bank Restructuring Fund	5,279	5,057
Depreciation fixed and intangible assets	5,143	5,514
Other professional services	3,528	3,336
Communication and transport costs	3,085	3,373
Consultancy, legal and audit services	2,784	3,040
Operating lease rentals	2,289	2,984
Training	2,230	1,845
IT expenses	1,298	1,166
Security services	1,278	1,439
Maintenance and utilities	1,171	1,224
Marketing, advertising and representation	599	668
Non-profit tax	467	191
Other administrative expenses	3,027	1,289
Total administrative expenses	**32,178**	**31,126**

Total fees incurred for the services provided by the group external auditors were BGN 142 thousand (2016: BGN 124 thousand).

14 Income tax expense

	2017	2016
Current income tax	4,093	4,717
Deferred income tax (note 21)	(255)	(170)
Total income tax expenses	**3,838**	**4,547**

The tax on the operating profit differs from the theoretical amount that would arise using the basic tax rate as follows:

	2017	2016
Profit before income tax	**36,003**	**42,379**
Theoretical tax at a tax rate of 10 % (2016: 10 %)	3,600	4,238
Tax effect from non-taxable income	(21)	(8)
Tax effect of expenses not deductible for tax purposes	259	317
Total income tax expense	**3,838**	**4,547**

The effective tax rate for 2017 is: 10.7% (2016: 10.7%).

15 Cash and cash equivalents

	2017	2016
Cash in hand	44,765	55,456
Balances with the central bank (excl. mandatory reserve)	15,035	44,806
Mandatory reserve deposits	132,277	111,006
Total cash and cash equivalents	**192,077**	**211,268**
Loans and advances to banks with a maturity up to 3 months	288,322	284,494
Minimum reserve with central bank, which does not qualify as cash for the statement of cash flows	(132,277)	(111,006)
Cash and cash equivalents for the statement of cash flows	**348,122**	**384,756**

16 Loans and advances to banks

	2017	2016
Current accounts	258,984	225,818
Up to three months	29,336	58,675
Above three months	-	47,018
Total loans and advances to banks	**288,320**	**331,511**

17 Available-for-sale financial assets

	2017	2016
Bulgarian Government bonds	28,729	39,655
Shares	3,863	3,180
Total available-for-sale financial assets	**32,592**	**42,835**

The shares represent investments in local and foreign financial intermediary institutions.

	2017	2016
Opening balance	**42,835**	**28,012**
Additions	-	37,974
Disposals	(10,181)	(23,426)
Gains / (losses) from changes in FV	952	(215)
Premium amortization	(556)	(354)
Change in accrued interest	(63)	144
Foreign currency revaluation	(395)	700
Closing balance	**32,592**	**42,835**

18 Loans and advances to customers

	2017	2016
Total gross loans and advances	1,444,808	1,251,556
Less provision for impairment	(40,973)	(42,165)
Total net loans and advances	**1,403,835**	**1,209,391**

19 Allowance for losses on loans and advances to customers

Movement in provisions was as follows:	**2017**	**2016**
Balance as of 1 January	**42,165**	**38,616**
Increase in provisions for loan impairment	2,714	9,330
Loans written off	(3,906)	(5,781)
Balance as of 31 December	**40,973**	**42,165**

Allowance for impairment on loans and advances to customers was formed as follows:

	2017	**2016**
Increase in provisions for loan impairment	2,714	9,330
Less recoveries on loans previously written off	(2,049)	(5,984)
Recognised in the Statement of Profit or Loss	**665**	**3,346**

20 Property, plant and equipment and Intangible assets

	Land and buildings	**Furniture and fixtures**	**IT and other equipment**	**Leasehold improve-ments**	**Intangible assets**	**Total**
Cost						
Balance as of 1 Jan 2016	33,564	2,349	34,331	6,571	10,180	86,995
Acquisitions	26	481	4,614	803	1,251	7,175
Disposals	-	(311)	(6,495)	(2,994)	(162)	(9,962)
Balance as of 31 Dec 2016	**33,590**	**2,519**	**32,450**	**4,380**	**11,269**	**84,208**
Depreciation						
Balance as of 1 Jan 2016	4,426	956	21,195	2,707	7,259	36,543
Depreciation for the period	800	229	3,079	491	915	5,514
Accumulated depreciation of disposal	-	(21)	(6,108)	(1,587)	(161)	(7,877)
Balance as of 31 Dec 2016	**5,226**	**1,164**	**18,166**	**1,611**	**8,013**	**34,180**
Carrying amounts						
Balance as of 1 Jan 2016	29,138	1,393	13,136	3,864	2,921	50,452
Balance as of 31 Dec 2016	28,364	1,355	14,284	2,769	3,256	50,028
Cost						
Balance as of 1 Jan 2017	33,590	2,519	32,450	4,380	11,269	84,208
Acquisitions	135	208	222	88	1,536	2,189
Disposals	-	(503)	(3,901)	(2,276)	-	(6,680)
Balance as of 31 Dec 2017	**33,725**	**2,224**	**28,771**	**2,192**	**12,805**	**79,717**
Depreciation						
Balance as of 1 Jan 2017	5,226	1,164	18,166	1,611	8,013	34,180
Depreciation for the period	807	207	2,840	276	1,012	5,142
Accumulated depreciation of disposal	-	(257)	(3,552)	(871)	-	(4,680)
Balance as of 31 Dec 2017	**6,033**	**1,114**	**17,454**	**1,016**	**9,025**	**34,642**
Carrying amounts						
Balance as of 1 Jan 2017	28,364	1,355	14,284	2,769	3,256	50,028
Balance as of 31 Dec 2017	27,692	1,110	11,317	1,176	3,780	45,075

21 Deferred income tax assets

The deferred income taxes relate to the following temporary differences:

	2017	2016
Deferred income tax assets		
Repossessed properties	1,012	765
Unused staff holiday time	59	75
Other temporary differences	45	58
Total deferred tax assets	**1,116**	**898**
Deferred tax liabilities		
Property, plant and equipment	512	549
Other temporary differences	46	46
Total deferred income tax liabilities	**558**	**595**

The following table analyses the change in deferred taxes:

	2017	2016
Unused staff holiday time	(16)	15
Repossessed properties	247	211
Property, plant and equipment	37	(14)
Other temporary differences	(13)	(42)
Total change in deferred taxes (note 14)	**255**	**170**

22 Other assets

	2017	2016
Repossessed properties	8,993	13,062
Accounts receivable	3,041	3,049
Prepayments	787	767
Tax receivables	123	1
Total other assets	**12,944**	**16,879**

Repossessed properties shown in the above table include real estates, agricultural and regulated land, etc. They are carried at the lower of the previous carrying amount of the written-off loan and the expected selling price less cost to sell. Reconciliation of the carrying amount of repossessed property is presented in the following table:

Repossessed property	**2017**	**2016**
Balance as of 1 January	**13,062**	**19,727**
Additions	578	1,518
Disposals (sales)	(1,677)	(5,201)
Impairment of repossessed property	(2,970)	(2,982)
Balance as of 31 December	**8,993**	**13,062**

23 Liabilities to banks

	2017	2016
Current accounts	175	329
Term deposits	30,000	35,700
Loans	53,683	25,914
Total liabilities to banks	**83,858**	**61,943**

The current accounts include liabilities to ProCredit Bank Germany and liabilities to other banks of the ProCredit Holding group in the amount of BGN 92 thousand (2016: BGN 92 thousand). Term deposits comprise money market liabilities to local banks with maturity less than 1 month. The loans include liabilities to ProCredit Bank Germany in the amount of BGN 45,015 thousand (2016: BGN 16,747 thousand) with maturity 2019 and liabilities to ProCredit Bank Germany in the amount of BGN 8,668 thousand (2016: BGN 9,167 thousand) with maturity 2024.

24 Liabilities to customers

	2017	2016
Current accounts		
- private individuals	104,437	121,599
- legal entities	656,703	606,839
Total current accounts	**761,140**	**728,438**
Saving accounts		
- private individuals	111,659	102,792
- legal entities	184,543	38,953
Total saving accounts	**296,202**	**141,745**
Term deposit accounts		
- private individuals	172,321	230,123
- legal entities	220,211	137,925
Total term deposit accounts	**392,532**	**368,048**
Payments in transit	16,271	7,548
Liabilities to customers	**1,466,145**	**1,245,779**

25 Liabilities to financial institutions

Institution	**Final year of maturity**	**2017**	**2016**
European Investment Fund (EIF)	2026	72,136	96,816
ProCredit Holding	2020	68,601	176,025
Black Sea Trade and Development Bank	2018	39,083	-
KfW	2018	20,995	20,784
European Investment Bank (EIB)	2017	-	19,587
Total liabilities to institutions		**200,815**	**313,212**

The loan agreement with the European Investment Fund is under the JEREMIE program aimed towards co-financing of small and medium enterprises. The bank was in compliance with the covenants included in the respective loan agreements in 2017.

26 Other liabilities

	2017	2016
Creditors	5,822	4,325
Non-income taxes payable	666	699
Deferred income	465	472
Other due payments	19	16
Total other liabilities	**6,972**	**5,512**

27 Provisions

	2017	2016
Provisions for post-employment benefits (see below)	101	111
Provisions for losses from off-balance sheet items	220	220
Provisions for unused staff holiday time	248	394
Total provisions	**569**	**725**

Obligations for defined benefit retirement compensation

The estimated amount of the obligation as at each reporting date and the expenses for retirement compensation recognized are based on an actuarial report (see below information on actuarial assumptions).

The defined benefit plan (obligation for compensation upon retirement) is an unfunded plan.

Movement in the present value of the defined benefit obligations

	2017	2016
Defined benefit obligations as of 1 January	**111**	**110**
Current service costs	16	17
Interest cost	2	3
Past service cost - non-vested benefits	-	(9)
Actuarial (gains) losses from changes in financial and demographic assumptions	(28)	(10)
Defined benefit obligations as of 31 December	**101**	**111**

Actuarial assumptions

The following are the principal actuarial assumptions at the reporting date (expressed as weighted averages).

	2017	2016
Discount rate as of 31 December	2.0%	2.5%
Future salary increases	5.0%	5.0%
Interest rate increase/decrease	5.0%	5.0%

28 Equity

Share capital and share premium

As of end 2017 the capital of the bank consists of registered capital and share premium. The registered capital of BGN 164,210 thousand is divided into 164,210 thousand shares (2016: 164,210 thousand shares) with a nominal value of BGN 1 each. All shares confer equal voting power and are fully paid. The sole owner of the bank's capital is ProCredit Holding. The share premium is BGN 3,496 thousand (2016: BGN 3,496 thousand).

Retained earnings and reserves

Legal and other reserves – the reserves have been distributed from the net profit of the bank in compliance with the Commercial Law, article 246. The funds in these reserves could only be used for covering of current loss and loss from previous years.

Revaluation reserve – comprise accumulated revaluation by fair value of available-for-sale financial assets as well as changes in the actuarial gains or losses related to the calculation of provisions for post-employment benefits

Retained earnings – comprise the retained profit of the bank. The bank paid dividends BGN 51,015 thousand in 2017 from its retained earnings from 2016.

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

	Liabilities		Equity			
	Liabilities to banks	Liabilities to institutions	Share capital/ premium	Reserves	Retained earnings	Total
Balance at 1 Jan 2017	**61,943**	**313,211**	**167,706**	**10,486**	**56,393**	**609,739**
Proceeds from liabilities to banks and fin. institutions	39,116	107,571	-	-	-	146,687
Repayment of liabilities to banks and fin. institutions	(11,255)	(44,238)	-	-	-	(55,493)
Dividend paid	-	-	-	-	(51,015)	(51,015)
Total changes from financing cash flows	**27,861**	**63,333**	**-**	**-**	**(51,015)**	**40,179**
Other changes						
Liability-related						
Short term liabilities to banks and fin. institutions	(5,855)	(176,025)	-	-	-	(181,880)
Interest expense	638	1,195	-	-	-	1,833
Interest paid	(729)	(899)	-	-	-	(1,628)
Total liability-related other changes	**(5,946)**	**(175,729)**	**-**	**-**	**-**	**(181,675)**
Equity-related						
Revaluation of afs securities, net of taxes	-	-	-	934	-	934
Other increase (decrease) in equity	-	-	-	2,508	(2,508)	-
Profit for the year	-	-	-	-	32,165	32,165
Total equity-related other changes	**-**	**-**	**-**	**3,442**	**29,657**	**33,099**
Balance at 31 Dec 2017	**83,858**	**200,815**	**167,706**	**13,928**	**35,035**	**501,342**

30 Contingent liabilities and commitments

Off-balance sheet commitments

The following table indicates the contractual amounts of the group's off-balance sheet financial instruments that commit it to extend credit to customers:

	2017	2016
Commitments to extend credit	231,065	236,780
Letters of credit and letters of guarantee	37,290	32,476
Total contingencies and commitments	**268,355**	**269,256**

Operating lease commitments

The group leases a number of branch premises under operating leases. The leases typically run for a period of up to ten years. The leases are cancellable with prior notification up to six months. As a lessee under operating leases, the group has committed to make the following minimum rental payments:

	2017	2016
Up to 1 year	597	913

31 Related party transactions

ProCredit Holding is the sole shareholder, the ultimate parent and ultimate controlling party of the group. The group has stand-by line agreement with ProCredit Holding, directed towards liquidity management, which is not utilized at the end of 2017. The group has received loans from ProCredit Bank Germany (fully owned subsidiary of ProCredit Holding) under loan agreements. Other banks in the ProCredit Holding group keep current accounts placements with the bank, which are disclosed in note 23.

The related party transactions were carried out on commercial terms and at market rates. The volumes of related party transactions outstanding at year end, and associated expenses and income for the year are as follows:

Transactions with ProCredit Holding	**2017**	**2016**
Other income earned	48	101
Liabilities at the end of the period	68,601	176,025
Interest expense incurred	699	159
Other expenses incurred	1,932	1,551

Transactions with other ProCredit group entities	**2017**	**2016**
Loans and advances at the end of the period	288,318	329,783
Interest income earned	386	212
Other income earned	184	200
Liabilities at the end of the period	53,775	26,006
Interest expense incurred	631	592
Other expenses incurred	1,851	1,519

In 2017, the total compensation of key management personnel was BGN 545 thousand (2016: BGN 488 thousand).

32 Events after the reporting period

There have been no events after the reporting period that may have a material effect on the consolidated financial statements for 2017.

ProCredit Bank

Part of the
ProCredit Group

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