PROCREDIT BANK (BULGARIA) EAD
SEPARATE FINANCIAL STATEMENTS
31 DECEMBER 2022

The separate 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

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Independent Auditors' Report

To the sole shareholder of ProCredit Bank (Bulgaria) EAD

Report on the Audit of the Separate Financial Statements

Opinion

We have audited the separate financial statements of ProCredit Bank (Bulgaria) EAD (the Bank) as set out on pages 1 to 76, which comprise the separate statement of financial position as at 31 December 2022 and the separate statement of profit or loss, separate statement of other comprehensive income, separate statement of changes in equity and separate statement of cash flows for the year then ended, and notes to the separate financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying separate financial statements give a true and fair view of the unconsolidated financial position of the Bank as at 31 December 2022, and of its unconsolidated financial performance and its unconsolidated cash flows for the year then ended in accordance with IFRS 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 Separate Financial Statements" section of our report. We are independent of the Bank in accordance with the International Ethics Standards Board for Accountants International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) together with the ethical requirements of the Independent Financial Audit Act (IFAA) that are relevant to our audit of the separate financial statements in Bulgaria, and we have fulfilled our other ethical responsibilities in accordance with the requirements of the IFAA and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

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

We have determined the following key audit matter:

Expected credit losses ("ECL") related to loans and advances to customers

As at 31 December 2022, the separate financial statements include:

- Gross loans and advances to customers of BGN 2,809,922 thousand (31 December 2021: BGN 2,399,177 thousand) and related ECL allowance of BGN 44,175 thousand (31 December 2021: BGN 39,194 thousand), as discussed in note 18 to the separate financial statements;

and, for the year ended:

- Impairment charge for credit losses recognized in the income statement of BGN 13,245 thousand (2021: BGN 6,327 thousand), as discussed in note 7 to the separate financial statements.

Also refer to the following notes to the separate financial statements:

- 3 h Loss allowance
- 4 c Credit risk

Key audit matter	*How this key audit matter was addressed in our audit*
Impairment allowances for loans and advances to customers (collectively, "loans", "exposures") represent the Bank's best estimate of expected credit losses ("ECL") associated with these exposures at the reporting date. Measurement thereof requires the Bank to make complex judgements and assumptions. As described in Note 3 h , the expected credit losses have been determined in accordance with the Bank's accounting policies based on the requirements of IFRS 9 Financial Instruments ("IFRS 9"). As required by IFRS 9, the Bank estimates the expected credit losses considering a stage allocation of the loan exposures. For performing exposures (stage 1 and stage 2 loans in the IFRS 9 hierarchy), as well as stage 3 exposures not exceeding specific thresholds, the expected credit losses are determined based on statistical models using the Bank's historical debt service data and also forward-looking information and macroeconomic scenarios. The key assumptions in this area are, among other things, the probability of borrower's default ("PD"), the assessment of	Our audit procedures performed where applicable with the assistance of our financial risk management specialists, valuation and IT audit specialists included among others: — Evaluating the appropriateness of the loan impairment accounting policies and related methods and models against the requirements of the relevant accounting standard, our business understanding and industry practice. As part of the above, we challenged the Management Board on whether the level of the methodology's sophistication is appropriate based on an assessment of the entity-level and portfolio-level factors; — Making relevant inquiries of the Bank's risk management, internal audit and information technology (IT) personnel in order to obtain an understanding of the ECL estimation process, IT applications used therein, key data sources and assumptions used in the ECL model. Also, assessing and testing the Bank's IT control environment for access and program change; — Testing the design, implementation and operating effectiveness of selected key

the amount non-recoverable from the borrower in the event of a default ("loss given default", "LGD") and of the amount of exposure at default ("EAD"). In the wake of the geopolitical volatility following the outbreak of the Russo-Ukrainian war, the adverse macroeconomic effects of the increase in energy and other commodity prices, resulting inflationary pressures and disruptions in the global supply chains, as well as of the rise in interest rates, measurement of the collective impairment allowance was associated with additional complexities and an increased estimation uncertainty. Among other things, the application of post-model adjustments was required from management in arriving at the year-end estimate of collective impairment losses.

For Stage 3 exposures in excess of specific thresholds, expected credit losses are determined on an individual basis by means of a discounted cash flows analysis. The process involves subjectivity and reliance on a number of significant assumptions, including those in respect of the expected proceeds from the sale of the related collateral and minimum period for collateral disposal.

Given the above factors and complexities, we considered impairment of loans and advances to be associated with a significant risk of material misstatement in the financial statements, which required our increased attention in the audit and as such was determined to be a key audit matter.

controls over the approval, recording and monitoring of loans, including, but not limited to, the controls relating to the appropriateness of the classification of exposures into performing and non-performing, calculation of days past due, stage allocation and calculation of the ECL;

— For a sample of loans, critically assessing, by reference to the underlying loan documentation (updated financial indicators, repayment pattern, default events, forborne status) and through inquiry with the loan officers and credit risk management personnel, the existence of any triggers for classification to Stage 2 or Stage 3 as at 31 December 2022;

For ECLs estimated on a collective basis:

— Obtaining the Bank's relevant macroeconomic forecasts and critically assessing the forward-looking information and macroeconomic scenarios used in the calculation of the ECL, by means of corroborating inquiries of the Management Board and inspecting publicly available information;

— Challenging the collective PD, LGD and EAD parameters for a sample of the Bank's portfolios, by reference to, among other things, our own analysis of the Bank's data on past default occurrence, realized losses on those defaults, contractual cash flows and contractual lifetime;

— Testing post-model related adjustments to reflect the current market volatility not reflected in the original ECL models. As part of the procedure, we evaluated the data, assumptions and methods used in calculating the adjustments;

— Recalculating the expected credit losses as of 31 December 2022 based on the Bank's ECL model for the entire Bank's portfolio;

For ECLs estimated on an individual basis:

— For those loans where triggers for classification in Stage 3 were identified, challenging key assumptions applied in the Management Board's estimates of future cash flows in the impairment calculation, including time to sell and any realizable value of the collateral, by reference to the underlying collateral agreements and

	appraisals, whose relevance and reliability we independently assessed; For loan exposures in totality: — Examining whether the Bank's ECL-related disclosures in the separate financial statements appropriately address the relevant quantitative and qualitative requirements of the applicable financial reporting framework.

Information Other than the Separate Financial Statements and Auditors' Report Thereon

Management is responsible for the other information. The other information comprises the separate annual activity report and the separate corporate governance declaration, prepared by management in accordance with Chapter Seven of the Accountancy Act, but does not include the separate financial statements and our auditors' report thereon.

Our opinion on the separate 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 separate financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the separate financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. 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 separate annual activity report and the separate corporate governance declaration, we have also performed the procedures added to those required under ISAs in accordance with the New and enhanced auditor's reports and auditor's communication Guidelines of the professional organisation of certified public accountants and registered auditors in Bulgaria, 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 about whether the other information includes the disclosures and reporting provided for in the applicable in Bulgaria Chapter Seven of the Accountancy Act and Art. 100(m), paragraph 8, where applicable, of the Public Offering of Securities Act.

Opinion in connection with Art. 37, paragraph 6 of the Accountancy Act

Based on the procedures performed, our opinion is that:

- The information included in the separate annual activity report for the financial year for which the separate financial statements have been prepared is consistent with those separate financial statements.
- The separate annual activity report has been prepared in accordance with the requirements of Chapter Seven of the Accountancy Act.
- The separate corporate governance declaration for the financial year for which the separate financial statements have been prepared presents the information required under Chapter Seven of the Accountancy Act and Art. 100 (m), paragraph 8, where applicable, of the Public Offering of Securities Act.

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

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

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

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

Auditors' Responsibilities for the Audit of the Separate Financial Statements

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

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

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

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control;

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management;

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditors' report to the related disclosures in the separate financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditors' report. However, future events or conditions may cause the Bank to cease to continue as a going concern;

- Evaluate the overall presentation, structure and content of the separate financial statements, including the disclosures, and whether the separate financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

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

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

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

We are jointly and severally responsible for performing our audit and for our audit opinion as per the requirements of the Independent Financial Audit Act, applicable in Bulgaria. When accepting and performing the joint audit engagement, in relation to which we are reporting, we are also directed by the Guidelines for performing joint audit, issued on 13 June 2017 by the Institute of Certified Public Accountants in Bulgaria and by the Commission for Public Oversight of Statutory Auditors in Bulgaria.

Report on Other Legal and Regulatory Requirements

Reporting in accordance with Art. 10 of Regulation (EU) No 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) No 537/2014, we hereby additionally report the information stated below.

- KPMG Audit OOD and Baker Tilly Klitou and Partners EOOD were appointed as statutory auditors of the separate financial statements of the Bank for the year ended 31 December 2022 by the minutes of an extraordinary session of the sole owner of the capital held on 25 November 2022 for a period of one year. The audit engagement was accepted by a Joint Audit Engagement Letter dated 18 November 2022.
- The audit of the separate financial statements of the Bank for the year ended 31 December 2022 represents third total uninterrupted statutory audit engagement for that entity carried out by KPMG Audit OOD and sixth total uninterrupted statutory audit engagement for that entity carried out by Baker Tilly Klitou and Partners EOOD.
- We hereby confirm that the audit opinion expressed by us is consistent with the additional report, provided to the Bank's audit committee, in compliance with the requirements of Art. 60 of the Independent Financial Audit Act.

- We hereby confirm that we have not provided the prohibited non-audit services referred to in Art. 64 of the Independent Financial Audit Act.
- We hereby confirm that in conducting the audit we have remained independent of the Bank.

Sofia, 13 April 2023

For KPMG Audit OOD:

Ivan Andonov
Authorised representative

Sevdalina Dimova
Registered auditor, responsible for the audit

45/A Bulgaria Boulevard
Sofia 1404, Bulgaria

ОДИТОРСКО ДРУЖЕСТВО
София
Рег. № 045
КПМГ ОДИТ ООД

For For Baker Tilly Klitou and Partners EOOD:

Galina Lokmadjieva
Authorized representative and Registered auditor, responsible for the audit

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

ОДИТОРСКО ДРУЖЕСТВО
София
Рег. № 129
БЕЙКЪР ТИЛИ КЛИТУ И ПАРТНЬОРИ ЕООД

Separate Statement of Profit or Loss

(all amounts expressed in thousands of BGN)	Notes	Year ended 31 December	
		2022	**2021**
Interest income calculated using the effective interest rate method	6	84,434	72,743
Interest and similar expenses	6	(6,216)	(4,299)
Net interest income		**78,218**	**68,444**
Loss allowance	7	(13,245)	(6,327)
Net interest income after loss allowances		**64,973**	**62,117**
Fee and commission income	8	31,933	28,769
Fee and commission expenses	8	(4,047)	(3,184)
Net fee and commission income		**27,886**	**25,585**
Result from foreign exchange transactions	9	10,310	8,839
Other income	10a	3,787	2,146
Other expenses	10b	(760)	(1,106)
Personnel expenses	11	(24,339)	(23,256)
Administrative expenses	12	(37,507)	(31,867)
Operating expenses		**(61,846)**	**(55,123)**
Profit before income tax		**44,350**	**42,458**
Income tax expense	13	(4,910)	(3,721)
Profit for the year		**39,440**	**38,737**

These separate financial statements on pages 1 to 76 were approved by the Management Board and signed on its behalf by:

Reni Peycheva
Executive Director and
Member of the Management Board
13 April 2023

Ivan Dachev
Executive Director and
Member of the Management Board

Initialled for identification purposes in reference to the auditors' report:

For KPMG Audit OOD

Sevdalina Dimova
Registered Auditor responsible for the audit

Ivan Andonov
Authorised representative
For KPMG Audit OOD

For Baker Tilly Klitou and Partners EOOD

Galina Lokmadjieva
Registered Auditor responsible for the audit
Authorised representative
For Baker Tilly Klitou and Partners EOOD

The notes set out on pages 6 to 76 form an integral part of these separate financial statements.

Одиторско дружество София Рег. № 045 КПМГ Одит ООД

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

Separate Statement of Other Comprehensive Income

(all amounts expressed in thousands of BGN)	Notes	Year ended 31 December	
		2022	**2021**
Profit for the year		39,440	38,737
Items that will not be reclassified to profit or loss			
Change in revaluation reserve from financial assets at fair value through other comprehensive income (shares)		(275)	18
Items that may be reclassified subsequently to profit or loss			
Change in revaluation reserve from financial assets at fair value through other comprehensive income (Bulgarian Government debt securities)		(1,400)	(184)
Other comprehensive income for the year, net of tax		**(1,675)**	**(166)**
Total comprehensive income for the year		**37,765**	**38,571**

These separate financial statements on pages 1 to 76 were approved by the Management Board and signed on its behalf by:

Reni Peycheva
Executive Director and
Member of the Management Board
13 April 2023

Ivan Dachev
Executive Director and
Member of the Management Board

Initialled for identification purposes in reference to the auditors' report:

For KPMG Audit OOD

Sevdalina Dimova
Registered Auditor responsible for the audit

Ivan Andonov
Authorised representative
For KPMG Audit OOD

For Baker Tilly Klitou and Partners EOOD

Galina Lokmadjieva
Registered Auditor responsible for the audit
Authorised representative
For Baker Tilly Klitou and Partners EOOD

The notes set out on pages 6 to 76 form an integral part of these separate financial statements.

Separate Statement of Financial Position

(all amounts expressed in thousands of BGN)	Notes	31.12.2022	31.12.2021
ASSETS			
Cash and central bank balances	14	561,028	583,408
Loans and advances to banks	15	245,476	122,085
Investment securities (FVOCI)	16	72,545	68,561
Investments in subsidiaries	17	8,632	8,632
Loans and advances to customers, net	18	2,765,747	2,359,983
Property, plant and equipment	19	41,079	35,173
Intangible assets	19	10,095	6,754
Derivative financial assets	26	15,117	303
Deferred tax assets	20	-	29
Other assets	21	8,599	4,710
Total assets		**3,728,318**	**3,189,638**
LIABILITIES			
Liabilities to banks	22	16,230	324
Liabilities to customers	23	3,060,800	2,640,520
Liabilities to financial institutions	24	230,716	168,044
Lease liabilities	25	10,905	10,946
Derivative financial liabilities	26	47	165
Other liabilities	27	4,623	4,536
Provisions	28	2,067	1,248
Current tax liabilities		1,722	488
Deferred tax liabilities	20	76	
Total liabilities		**3,327,186**	**2,826,271**
EQUITY			
Share capital and share premium	29	236,160	236,160
Legal reserve		22,704	19,770
Retained earnings		140,200	103,694
Revaluation reserve		2,068	3,743
Total equity		**401,132**	**363,367**
Total equity and liabilities		**3,728,318**	**3,189,638**

These separate financial statements on pages 1 to 76 were approved by the Management Board and signed on its behalf by:

Reni Peycheva
Executive Director and
Member of the Management Board
13 April 2023

Ilia Dachev
Executive Director and
Member of the Management Board

Initialled for identification purposes in reference to the auditors' report:

For KPMG Audit OOD

Sevdalina Dimova
Registered Auditor responsible for the audit

Ivan Andonov
Authorised representative
For KPMG Audit OOD

For Baker Tilly Klitou and Partners EOOD

Galina Lokmadjieva
Registered Auditor responsible for the audit
Authorised representative
For Baker Tilly Klitou and Partners EOOD

The notes set out on pages 6 to 76 form an integral part of these separate financial statements.

Separate Statement of Changes in Equity

(all amounts expressed in thousands of BGN)	Share capital	Share premium	Legal reserve	Retained earnings	Revaluation reserve	Total
Balance as of 1 January 2021	**203,326**	**3,496**	**16,836**	**67,891**	**3,909**	**295,458**
Comprehensive income for the year						
Change in revaluation reserve, net of taxes	-	-	-	-	(166)	(166)
Transfer	-	-	2,934	(2,934)	-	-
Profit for the year	-	-	-	38,737	-	38,737
Total comprehensive income for the year	**-**	**-**	**2,934**	**35,803**	**(166)**	**38,571**
Transactions with owners, recorded directly in equity						
Contributions by and distributions to owners						
Capital increase (note 4i)	29,338	-	-	-	-	29,338
Total contributions by and distributions to owners	**29,338**	**-**	**-**	**-**	**-**	**29,338**
Balance as of 31 December 2021	**232,664**	**3,496**	**19,770**	**103,694**	**3,743**	**363,367**
Comprehensive income for the year						
Change in revaluation reserve, net of taxes	-	-	-	-	(1,675)	(1,675)
Transfer	-	-	2,934	(2,934)	-	-
Profit for the year	-	-	-	39,440	-	39,440
Total comprehensive income for the year	**-**	**-**	**2,934**	**36,506**	**(1,675)**	**37,765**
Balance as of 31 December 2022	**232,664**	**3,496**	**22,704**	**140,200**	**2,068**	**401,132**

These separate financial statements on pages 1 to 76 were approved by the Management Board and signed on its behalf by:

Reni Peycheva
Executive Director and
Member of the Management Board
13 April 2023

Ivan Dachev
Executive Director and
Member of the Management Board

Initialled for identification purposes in reference to the auditors' report:

For KPMG Audit OOD

Sevdalina Dimova
Registered Auditor responsible for the audit

Ivan Andonov
Authorised representative
For KPMG Audit OOD

For Baker Tilly Klitou and Partners EOOD

Galina Lokmadjieva
Registered Auditor responsible for the audit
Authorised representative
For Baker Tilly Klitou and Partners EOOD

ОДИТОРСКО ДРУЖЕСТВО София Рег. № 045 КПМГ ОДИТ ООД

ОДИТОРСКО ДРУЖЕСТВО София Рег. № 129 БЕЙКЪР ТИЛИ КЛИТУ И ПАРТНЬОРИ ЕООД

The notes set out on pages 6 to 76 form an integral part of these separate financial statements.

Separate Statement of Cash Flows

(all amounts expressed in thousands of BGN)	Notes	Year ended 31 December	
		2022	2021
Profit for the year		39,440	38,737
Non-cash items and transition to the cash flow from operating activities			
Loss allowance	7	13,245	6,327
Net result from derivative financial instruments		(731)	-
Depreciation	12	6,502	6,100
Unrealised gains from currency revaluation	9	(472)	(13)
Gains from Property, plant and equipment and intangible assets		(27)	4
Net interest income	6	(78,218)	(68,444)
Income tax expense	13	4,910	3,721
Increase/ decrease of assets and liabilities from operating activities after non-cash items			
Required reserve with the central bank		(45,071)	(20,563)
Loans and advances to banks		(9,779)	(248,983)
Loans and advances to customers		(434,665)	(248,983)
Derivative financial assets		906	(303)
Other assets		(3,888)	1,264
Short term liabilities to banks and financial institutions		15,906	307
Liabilities to customers		420,197	231,548
Derivative financial liabilities		(1,045)	(161)
Other liabilities		905	502
Interest received		84,959	72,840
Interest paid		(3,831)	(2,201)
Interest paid (lease liabilities)		(138)	(119)
Income tax paid		(3,570)	(3,615)
Cash flow from operating activities		**5,535**	**16,948**
Cash flows from investing activities			
Purchases of Property, plant and equipment and intangible assets		(14,801)	(8,285)
Income from sale of Property, plant and equipment and intangible assets		460	1,331
Investments in subsidiaries		-	(2,000)
Securities purchased		(25,167)	(41,841)
Securities matured		19,558	2,025
Cash flow used in investing activities		**(19,950)**	**(48,770)**
Cash flow from financing activities			
Shares issued		-	29,337
Proceeds from long term liabilities to banks and financial institutions		97,792	39,116
Repayments from long term liabilities to banks and financial institutions		(35,599)	(68,566)
Lease liabilities		(1,649)	(1,831)
Cash flow from/(used in) financing activities		**60,544**	**(1,944)**
Net increase/(decrease) in cash and cash equivalents		**46,129**	**(33,766)**
Cash and cash equivalents at the beginning of the year		**464,092**	**497,858**
Cash and cash equivalents at the end of year	**14**	**510,221**	**464,092**

These separate financial statements on pages 1 to 76 were approved by the Management Board and signed on its behalf by:

Reni Peycheva
Executive Director and
Member of the Management Board
13 April 2023

Ivan Dachev
Executive Director and
Member of the Management Board

Initialled for identification purposes in reference to the auditors' report:

For KPMG Audit OOD

Sevdalina Dimova
Registered Auditor responsible for the audit

Ivan Andonov
Authorised representative
For KPMG Audit OOD

For Baker Tilly Klitou and Partners EOOD

Galina Lokmadjieva
Registered Auditor responsible for the audit
Authorised representative
For Baker Tilly Klitou and Partners EOOD

The notes set out on pages 6 to 76 form an integral part of these separate financial statements.

ОДИТОРСКО ДРУЖЕСТВО София Рег. № 045 КПМГ ОДИТ ООД

ОДИТОРСКО ДРУЖЕСТВО София Рег. № 129 БЕЙКЪР ТИЛИ КЛИТУ И ПАРТНЬОРИ ЕООД

1 Reporting entity

ProCredit Bank (Bulgaria) EAD (“ProCredit Bank“, “the bank” or “the institution”, UIC 130598160) was founded in October 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 three subsidiaries – ProCredit Properties EAD, ProCredit Education EAD and Private High School “Denis Diderot” EAD (referred to collectively as “the group”), which are wholly owned.

The bank is supervised through a Supervisory Board consisting of five members and a Management Board consisting of four members as of December 2022 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 enterprises (SMEs) in accordance to their business potential. Private clients are regular income receivers (salary, pension or other) 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 Separate 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 separate basis according to the Accountancy Act. The users of these separate financial statements should review them together with the consolidated financial statements of the group as at 31 December 2022 to be able to obtain full information on the financial position, financial result and changes in the financial position of the Group as a whole (ProCredit Bank (Bulgaria) EAD, ProCredit Properties EAD, ProCredit Education EAD and Private High School Denis Diderot EAD). The separate financial statements were approved by the Management Board on 13 April 2023.

The Separate Financial Statements comprise the Separate Statement of Profit or Loss, the Separate Statement of Other Comprehensive Income, the Separate Statement of Financial Position, the Separate Statement of Changes in Equity, the Separate Statement of Cash Flows and the Notes to the Separate Financial Statements.

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 bank is the calendar year.

2 Basis of preparation (continued)

b Measurement basis

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

- Financial assets and liabilities (including derivative instruments), measured at fair value.
- Assets held for sale - measured at fair value less costs to sell.
- Retirement benefit obligations – measured at present value of the retirement benefit obligation.

c Use of assumptions and estimates

The bank'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 Separate Financial Statements. Actual results may differ from these estimates.

All estimates and assumptions required in conformity with IFRS are best estimates undertaken in accordance with applicable standards. 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. The authenticity of accounting estimates and judgments is monitored regularly.

The bank makes estimates and judgments for the purposes of the accounting and disclosure. The resulting accounting estimates will, by definition, seldom equal the related actual results. Management judgements for certain items are especially critical for the bank's results and financial situation due to their materiality in amount. This applies to the following positions:

Impairment of credit exposures
Loss allowances are established in an amount equivalent to the expected loss for all financial assets recognised at amortised cost, for all debt instruments recognised at fair value with changes in fair value reported in Other Comprehensive Income (FVOCI), and for off-balance-sheet business. Expected credit losses are recorded in an approach with various stages. ProCredit Bank reports the balance sheet items “Central bank balances”, “Loans and advances to banks”, “Investment securities”, “Loans and advances to customers” and “Other assets” net (including loss allowances). Further information on the bank's accounting policy on loan loss provisioning can be found in Note 3h.

Measurement of deferred tax asset
The bank 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. The profit projection is based on the latest business planning as of December 2022 approved by the Supervisory Board of the bank and therefore reflects management's view of future business prospects. The tax planning period of the bank is five years. For details on the recognised amounts see notes 13 and 20.

Extension and termination options and critical judgements in determining the lease term
In determining the lease term, management considers all facts and circumstances that create an economic incentive to exercise an extension option, or not exercise a termination option. Extension options (or periods after termination options) are only included in the lease term if the lease is reasonably certain to be extended (or not terminated).

2 Basis of preparation (continued)

c Use of assumptions and estimates (continued)

For leases of premises, the following factors are normally the most relevant:

- If there are significant penalties to terminate (or not extend), the bank is typically reasonably certain to extend (or not terminate).
- If any leasehold improvements are expected to have a significant remaining value, the bank is typically reasonably certain to extend (or not terminate).
- Otherwise, the bank considers other factors including historical lease durations and the costs and business disruption required to replace the leased asset. Most extension options for offices leases have not been included in the lease liability, because the bank could replace the assets without significant cost or business disruption.

As at 31 December 2022 there are no potential future cash outflows which have been excluded from the lease liability because it is not reasonably certain that the leases will be extended (or not terminated).

The lease term is reassessed if an option is actually exercised (or not exercised) or the bank becomes obliged to exercise (or not exercise) it. The assessment of reasonable certainty is only revised if a significant event or a significant change in circumstances occurs, which affects this assessment, and that is within the control of the lessee. During the current financial year, there was no financial effect of revising lease terms to reflect the effect of exercising extension and termination options.

d New and amended standards

This note provides a list of the significant accounting policies adopted in the preparation of these separate financial statements. These policies have been consistently applied to all the years presented, unless otherwise stated.

(i) Standards, amendments and interpretations that are already effective

- Annual improvements to IFRS (2018-2020 cycle) with amendments to IFRS 1, IFRS 9, IFRS 16 (Illustrative Example) and IAS 41 have a minor impact on the separate financial statements with regard to the amendment to IFRS 9. The amendment clarifies which fees are to be included when assessing whether the contractual terms of a modified financial liability differ significantly from the original financial liability. The amendments are effective for annual periods beginning on or after 1 January 2022.

The following standards, amendments or interpretations were issued by the IASB and endorsed by the EU and had no impact on the separate financial statements: amendments to IFRS 16“ COVID-19-Related Rent Concessions beyond 30 June 2021”, amendments to IFRS 3: “Reference to the Conceptual Framework”, to IAS 16: "Property, Plant and Equipment – Proceeds before Intended Use" and to IAS 37: "Onerous Contracts – Cost of Fulfilling a Contract” “Deferral of IFRS 9”.

2 Basis of preparation (continued)

d New and amended standards (continued)

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

Certain new accounting standards and interpretations that are not mandatory for the reporting period at 31 December 2022 and have not been previously adopted by the bank have been published. The bank's assessment of the impact of these new standards and interpretations is set out below.

- Amendments to IAS 1 and to IFRS Practice Statement 2: “Making Materiality Judgements” have a negligible impact on the separate financial statements. The amendments are effective for annual periods beginning on or after 1 January 2023.
- Amendments to IAS 8: “Definition of accounting estimates” have a minor impact on the separate financial statements. The amendments are effective for annual periods beginning on or after 1 January 2023.
- Amendments to IAS 12: "Deferred Taxes related to Assets and Liabilities arising from a Single Transaction" have a minor impact on the measurement of deferred taxes. The amendments are effective for annual periods beginning on or after 1 January 2023.
- IFRS 17 “Insurance Contracts” will not have an impact on the separate financial statements. The standard is effective for annual periods beginning on or after 1 January 2023.
- Amendments to IAS 1: “Classification of Liabilities as Current or Non-Current” and “Non-current Liabilities with Covenants” have a minor impact on the separate financial statements. The amendments are, subject to the still pending EU endorsement, effective for annual periods beginning on or after 1 January 2024.
- Amendments to IFRS 16: “Lease Liability in a Sale and Leaseback” have a minor impact on the separate financial statements. The amendments are, subject to the still pending EU endorsement, effective for annual periods beginning on or after 1 January 2024.

There was no early adoption of any standards, amendments and 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 separate 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 separate 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 bank’s functional and presentation currency. All amounts stated within the separate 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 fixing at the moment of the operation. 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 Separate Statement of Profit or Loss (result from foreign exchange transactions).

3 Summary of significant accounting policies (continued)

a Foreign currency translation (continued)

In the case of changes in the fair value of financial assets at fair value through other comprehensive income 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 financial assets (debt instruments) at fair value through other comprehensive income are recognised in the Separate Statement of Profit or Loss.

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

As of 31 December 2022, 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 1.83371 for USD 1 (2021: BGN 1.95583 for EUR 1 and BGN 1.72685 for USD 1).

b Interest income and expenses

Interest income and expenses for all interest-bearing financial instruments are recognised in profit or loss using the effective interest rate method in the period in which they arise. The ‘effective interest rate’ is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument to:

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

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

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

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

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

Payments received in respect of written-off loans are not recognised in net interest income, but rather under “Loss allowances”.

3 Summary of significant accounting policies (continued)

c Fee and commission income and expenses

The bank provides banking services to private individuals and corporate customers (mainly SMEs), including account opening and management, provision of loan facilities, debit and credit cards, payment services in local and foreign currencies, cash operations on machines and others. Fees for ongoing account management are charged to the customer's account on a monthly basis. Transaction-based fees are charged to the customer's account when the transaction takes place. Servicing fees are charged on a monthly basis and are based on fixed rates reviewed by the bank. Fee and commission expenses concern fees incurred by the bank in dealings with other banks and are recognised on the date of the transaction.

Revenue from account service and servicing fees is recognised over time as the services are provided. Revenue related to transactions is recognised at the point in time when the transaction takes place.

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 bank does not engage in any foreign currency trading on its own account. This position also includes unrealised foreign currency revaluation effects.

e Financial instruments

ProCredit Bank classifies its financial assets according to their underlying business model. Differentiation is made between the following business models:

- "Hold to collect": The financial assets are held with the aim of collecting the contractual cash flows through interest and principal payments (Solely Payments of Principal and Interest ("SPPI") conform.
- "Hold to collect and sell": The financial assets are held with the aim of both collecting the contractual cash flows and selling the financial assets.
- "Other": This business model is used for financial assets that are neither allocated to the "hold to collect" business model nor to the "hold to collect and sell" business model.

The bank's business models for financial assets are assessed on the basis of groups of financial assets (portfolios). The allocation to a business model is based on the actual circumstances at the time of the assessment. This is a discretionary decision by the management. The following criteria, among others, are taken into account:

- the business and risk strategy of ProCredit Bank (and ProCredit group) and
- the way in which the development of the business model is evaluated and reported to the Management and the Supervisory Board of the bank
- if there were sales in previous periods, the frequency, volume, timing and reasons for those sales as well as expectations regarding future sales activities.

As a result, the balance sheet items allocated to the "hold to collect" business model are: "Central bank balances", "Loans and advances to banks", "Loans and advances to customers" and "Other assets". "Investment securities" (which are debt securities) are allocated to the "hold to collect and sell" business model. Furthermore, a small amount of shares are allocated to the "hold to collect and sell" business model, included in the balance sheet under "Investment securities". "Derivative financial assets" are allocated to the "other" business model.

There is no offsetting of any financial assets and financial liabilities.

3 Summary of significant accounting policies (continued)

e Financial instruments (continued)

Subsequent recognition of financial liabilities is generally performed at amortised cost. Only derivative financial liabilities are recognised at fair value.

(a) Financial assets and financial liabilities at fair value through profit or loss

Financial assets allocated to the “Other” business model are recognised at fair value through profit or loss. This includes “Derivative financial assets”. Only “Derivative financial liabilities” are recognised as financial liabilities at fair value through profit or loss.

Derivatives with a positive fair value at the balance sheet date are carried as financial assets and reported under “Derivative financial assets”. Derivatives with a negative fair value are carried as financial liabilities and are reported under “Derivative financial liabilities”. The bank designates certain derivatives as hedging instruments in qualifying hedging relationships (hedge accounting) in accordance with IFRS 9. At the inception of the hedging relationship, we formally document the relationship between the hedging instrument(s) and hedged item(s), including risk management objectives and strategies for undertaking the hedge, and the method of assessing effectiveness. The bank assess compliance with the effectiveness requirements both at the inception of the hedging relationship and on an ongoing basis.

Derivative financial instruments are initially recognised at fair value, and transaction costs are expensed in the Separate Statement of Profit or Loss. Purchases and sales of derivative financial instruments are recognised on the trade date – the date on which the bank commits to purchase or sell the instrument. Subsequently, the financial instruments are also carried at fair value. Gains and losses arising from changes in their fair value are immediately recognised in the Separate Statement of Profit or Loss of the period.

Derivative financial assets are derecognised when the rights to receive cash flows from the financial assets have expired or where the bank has transferred legal rights and substantially all risks and rewards of ownership. Derivative financial liabilities are derecognised when they are extinguished – that is, when the obligation is discharged, cancelled or expired.

(b) Financial assets at amortised cost

A financial asset is classified “at amortised cost” when the financial asset is assigned to the “hold to collect” business model with the objective to solely collect contractual cash flow through interest and principal payment (SPPI conform). These arise when the bank provides capital directly to a contracting party with no intention of trading the receivable.

These financial assets are initially recognised at fair value plus transaction costs; subsequently they are measured at amortised cost using the effective interest method. Expected credit losses are basically recognised using a three-stage model (see Note 3h for the accounting policy for impairment of credit exposures, as well as Notes 7 and 18). If the amount of the impairment loss decreases, the impairment allowance is reduced accordingly, and the amount of the reduction is recognised in the Separate Statement of Profit or Loss. The upper limit on the reduction of the impairment is equal to the gross carrying amount which would have been incurred as of the valuation date if there had not been any impairment. 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.

3 Summary of significant accounting policies (continued)

e Financial instruments (continued)

(c) Financial assets at fair value with changes in fair value recognised in Other Comprehensive Income

A financial asset is classified and recognised as “at fair value with changes in fair value recognised in Other Comprehensive Income” (“FVOCI financial instrument”), if the financial asset is allocated to a “hold to collect or sell” business model.

In general, “investment securities” are allocated to this business model. The cash flow criterion is checked individually. All debt investment securities fulfil the cash flow criterion (SPPI conform) but can be sold if required. Furthermore, a small amount of shares (also included under the position “Investment securities”) are allocated to this business model. In general, there is no intention to trade or sell these shares.

At initial recognition, the FVOCI financial instruments are recorded at fair value plus transaction costs that are directly attributable to the acquisition of the financial asset. Subsequently they are carried at fair value. Gains and losses arising from changes in fair value are recognised in the Separate Statement of Other Comprehensive Income under “Revaluation reserve”. If the financial asset is derecognised or impaired (for details on impairment, see Note 3h), the cumulative gain or loss previously recognised in the “Revaluation reserve” is recognised in the Separate Statement of Profit or Loss. Interest calculated using the effective interest rate method and foreign currency gains and losses on monetary assets classified as FVOCI financial instruments are recognised in the Separate Statement of Profit or Loss. For the FVOCI equity instruments, any dividend payments are recognised in the Separate Statement of Profit or Loss, but not the accumulated value change on derecognition (no recycling).

Purchases and sales of FVOCI financial instruments are recorded as of the trade date. They are derecognised when the rights to receive cash flows from the financial assets have expired or when the bank has transferred substantially all risks and rewards of ownership.

(d) Other financial liabilities at amortised cost

Other financial liabilities at amortised cost 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 Separate 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.

Fair value measurement principles

Upon acquisition, 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 subsequently recognised either at fair value or at amortised cost. In general, financial instruments at fair value are measured on a recurring basis in the financial statements.

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 date.

3 Summary of significant accounting policies (continued)

e Financial instruments (continued)

ProCredit Bank applies the IFRS hierarchy to measure fair value. The hierarchy categorises the inputs used in the valuation techniques to measure fair value into three levels:

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 market transactions with the asset or liability occur there sufficiently frequently and in sufficient volumes to ensure the ongoing availability of pricing information.

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 are approximations of 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 interest rates are not available, internal rates are used as an input for a discounted cash flow model. These internal rates reflect the cost of funds, taking into account foreign currency effects and maturities as well as 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 Investments in subsidiaries

Subsidiary is an entity controlled by the bank. Control over a subsidiary is achieved when ProCredit Bank is exposed, or has rights, to variable returns from its involvement with the subsidiary and has the ability to affect those returns through its power over the subsidiary. Investments in subsidiaries are measured at cost less impairment. The bank recognises dividend income from its subsidiaries.

g Cash and cash equivalents

Cash and cash equivalents comprise balances with less than three months' maturity including: cash, balances with the Bulgarian National Bank ("BNB") and the Bank of Greece excluding the minimum required reserve, and amounts due from other banks.

Cash and central bank balances comprise cash and balances with the BNB and the Bank of Greece, recognised at their nominal value.

h Loss allowances

The bank establishes loss allowances in an amount equivalent to the expected loss for all financial assets recognised at amortised cost, for all debt instruments recognised at fair value with changes in fair value reported in Other Comprehensive Income (FVOCI), and for off-balance-sheet financial instruments. In general, a three-stage model is used to report loss allowances. Estimates and assumptions are particularly necessary for determining which future-related macroeconomic factors are to be included. Furthermore, determining probabilities in the weighting of scenarios requires discretionary decisions.

3 Summary of significant accounting policies (continued)

h Loss allowances (continued)

ProCredit Bank sets aside loss allowances for the balance sheet items “Central bank balances”, “Loans and advances to banks”, “Loans and advances to customers”, “Investment securities” and for the financial assets under “Other assets”. These are generally recognised at net value within the corresponding balance sheet positions, except for the item “Investment securities” (debt securities), which are reported at fair value. The respective loss allowances are recognised in shareholders’ equity under “Revaluation reserve”.

Net change in loss allowances

The net change in loss allowances includes additions, reversals and change in loss allowances due to non-substantial modifications.

Recognition of loss allowances uses a three-stage model based on expected credit losses. Allocation to stages requires discretionary decisions to be made with regard to the definition of default, stage transfers and the determination of criteria as to whether there has been a significant increase in credit risk since recognition in the balance sheet:

- Stage 1: Financial assets are generally classified as “Stage 1” when they are recognised for the first time. ProCredit Bank establishes loss allowances in an amount equivalent to the expected credit losses that result from default events that are possible during a maximum of 12 months following the balance sheet date, insofar as there is no significant increase in credit risk since initial recognition.
- Stage 2: If credit risk increases significantly, the assets are classified as “Stage 2” and loss allowances are established in an amount equivalent to the expected credit losses over the entire remaining maturity.
- Stage 3: Defaulted financial assets are classified as “Stage 3” and loss allowances are likewise established in an amount equivalent to the expected credit losses over the entire remaining maturity. For significant exposures, loss allowances are determined on the basis of recoverable cash flows. For insignificant exposures, loss allowances are determined on the basis of portfolio-based parameters. Interest income is recognised at net book value (less loss allowances). Stage 3 also includes financial assets which are already impaired at initial recognition in the balance sheet (POCI). These financial assets are initially recognised at fair value and thus no loss allowances are established. Regardless of future changes in credit risk, POCI assets remain in Stage 3 until their derecognition.

For the “Other assets” position, loss allowances are established using the simplified approach. As a rule, loss allowances are recorded at initial recognition and on each subsequent reporting date in an amount equivalent to the expected credit losses during the total maturity period. For these generally short-term assets, the total maturity period has been set at 12 months.

Migration between the stages is possible in both directions, provided the grounds for the prior migration no longer exist. In the event that credit risk decreases, loss allowances already recorded are reversed.

Non-substantial modification
A non-substantial modification exists if a financial asset is modified without derecognition. The effect is to be recognised as a modification gain or loss. The modification gain or loss is equal to the difference between the original gross book value and the present value, discounted at the original effective interest rate, of the contractual cash flows under the modified terms.

3 Summary of significant accounting policies (continued)

h Loss allowances (continued)

Write-offs, recoveries and direct write-offs
When a loan is uncollectible, it is written off against the related loss allowance set aside. Such write-offs occur after all the necessary procedures have been completed and the amount of the loss has been determined. Subsequent recoveries of amounts previously written off are recognised in the Separate Statement of Profit or Loss under "Loss allowances".

Restructured credit exposures
Restructuring is defined as any modification of the terms and conditions of a credit exposure by agreement between the bank and the client to modify the payment plan of a credit exposure agreement in response to an increase in the current or future credit default risk associated with the client. Restructured credit exposures are assigned to Stage 3 at the moment of restructuring if either of the following conditions are met: the exposures is in arrears by more than 90 days, and/or cannot be expected to be repaid in full due to serious payment problems faced by the client. Otherwise, restructured loans are assigned to Stage 2.

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 and 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 Separate Statement of Profit or Loss in "other expense". 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 "other income", together with any realised gains or losses on disposal.

i 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. Amortization is calculated as follows:

Licences	7 years
Software	5 years

j Property, plant and equipment

Property, plant and equipment are stated at historical cost less 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.

3 Summary of significant accounting policies (continued)

j Property, plant and equipment (continued)

Subsequent purchase or production 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 bank and the cost of the item can be measured reliably. All other repairs and maintenance are charged to the Separate 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 the 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 "administrative expenses".

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

k Leases

ProCredit Bank is the lessee

At contract initiation, the bank assesses whether the agreement constitutes or contains a lease. This is the case when the agreement grants the right to control the use of an identified asset for a specified period of time in return for a fee. The bank uses the option to account for each leasing component and all related non-leasing components as a single leasing component. ProCredit Bank recognises an asset for the right of use granted as well as a lease liability on the commencement date. The right of use is recognised at acquisition costs. These include the amount of the lease liability, plus all lease payments made at or before the commencement date, initial direct costs and estimated dismantling and removal costs, less any incentives received. The right of use is amortised on a straight-line basis until the end of the lease term. Any impairment losses are also taken into account. The lease liability is recognised at the present value of the lease payments not yet made at that time. The lease payments are discounted at the lessee's incremental borrowing rate of interest. They are subsequently measured at amortised cost using the effective interest method.

Short-term leases or leases based on assets of minor value are not recognised in the balance sheet; instead, the lease payments are recognised under administrative expenses in the separate statement of profit or loss over the term of the lease.

3 Summary of significant accounting policies (continued)

k Leases (continued)

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

The right-of-use asset is presented as part of “Property, plant and equipment” on the separate statement of financial position.

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

- Fixed payments (including in-substance fixed payments), less any lease incentives receivable.

The lease payments are discounted using the lessee’s incremental borrowing rate, being the rate that the lessee would have to pay to borrow the funds necessary to obtain an asset of similar value in a similar economic environment with similar terms and conditions.

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

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

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

- The amount of the initial measurement of lease liability.

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

The right-of-use assets are depreciated over the shorter of the asset’s useful life and the lease term on a straight-line basis. The amortisation periods for the right-of-use assets are as follows:

- Office premises: 10 years

Payments associated with short-term leases and leases of low-value assets are recognized on a straight-line basis as an expense in profit or loss. The bank applies the exemption for low-value assets on a lease-by-lease basis i.e. for the leases where the asset is sub-leased, a right-of-use asset is recognised with corresponding lease liability; for all other leases of low value asset, the lease payments associated with those leases will be recognised as an expense on a straight-line basis over the lease term.

3 Summary of significant accounting policies (continued)

k Leases (continued)

(a) Bank’s leasing activities

The bank leases office premises. Leases are negotiated on an individual basis, but in general contain similar terms and conditions (incl. termination and renewal rights). The main lease features are summarised below:

- Office premises in general rented for a period of 10 years. The lease payments are fixed. 70% of the total lease liabilities are towards the bank’s subsidiary company ProCredit Properties EAD.

(b) Extension and termination options

Extension and termination options are included in the leasing contracts. These are used to maximise operational flexibility in terms of managing the assets used in the bank’s operations. For critical judgements in determining the lease term, please refer to Note 2.

(c) Low-value leases

The costs for low value leases are recognised on a straight-line basis during the reporting period. The total cost of low-value leases is disclosed in Note 25.

l Income taxes

Taxation has been provided for in the separate 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 Separate Financial Statements prepared in conformity with IFRS, as adopted by the EU. 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 financial instruments carried at fair value are charged to the Separate Statement of Other Comprehensive Income. The presentation in the Separate Statement of Other Comprehensive Income is made on a net basis. At the time of sale, the respective deferred taxes are transferred to current income tax.

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.

3 Summary of significant accounting policies (continued)

m Provisions (continued)

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.

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 increase in the present value of the obligation due to the passage of time is recognised as an interest expense. For the provisions for expected credit losses from off-balance sheet items and for provision for untaken vacation, the outflow of economic benefits is expected during the next one or two years.

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 bank, they are not recognised in the financial statements but are disclosed in the notes to the financial statements (see Note 31).

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 bank'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 loss allowance determined in accordance with IFRS 9 at 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 bank has an obligation to pay certain amounts to each employee who retires with the bank in accordance with Art. 222, § 3 of the Labour Code ("LC"). According to the regulations in the LC, when a labour contract of a bank employee, who has acquired a pension right, is ended, the bank 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 bank or in any entity from 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 bank estimates the approximate amount of the potential expenditure for every employee based on a calculation performed by a qualified actuary using the projected unit credit method. The bank 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, since these businesses have vital significance for the economic development and the creation of new jobs. The bank also focuses on serving private individuals who appreciate modern banking services, who have the capacity to save and who prefer to do their banking through electronic channels. ProCredit 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 private individuals. 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 to them the most suitable banking services. A strategic focus of the work with clients is on encouraging investments in energy efficiency, renewable energy, 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 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 bank 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 bank operates a branch in Thessaloniki, Greece offering full range of banking services to the local businesses and providing professional service and advice. The location in Thessaloniki is equipped with modern self-service area available to customers 24 hours and 7 days a week.

b Risk management strategy

ProCredit Bank is exposed to risks in the course of its business activities. An informed and transparent approach to risk management is a central component of its socially responsible business model. This is also reflected in the risk culture and the risk appetite, resulting in decision-making processes that are well-balanced from a risk point of view.

4 Risk management (continued)

b Risk management strategy (continued)

An informed and transparent approach to risk management is a central component of ProCredit Bank's socially responsible business model. This is also reflected in the risk culture and risk appetite, resulting in decision-making processes that are well-balanced from a risk point of view. By following a consistent group-wide approach to managing risks, the bank aims to ensure that its liquidity and capital adequacy continues to be sustainable and appropriate at all times, as well as to achieve steady results. The risk management principles and the risk strategy of the bank have not changed compared to the previous year.

Rising energy prices and increasing inflation in the course of 2022 caused further uncertainty in the countries of operation. So far, the influence of these macroeconomic developments on the quality of the loan portfolio has been limited. These developments will determine the focus of the risk management activities in 2023. The bank will continue to closely monitor the macroeconomic situation in order to assess the impact and, if necessary, take measures in a timely manner.

The bank complied with internal limits as well as all applicable regulatory requirements at all times during the 2022 financial year. Even in light of the above-mentioned uncertainties, the bank's overall risk profile remains appropriate. This is based on an overall assessment of the individual risks, as presented in this risk report.

The principles of the bank's business activity, as listed below, provide the foundation for its risk management. The consistent application of these principles significantly reduces the risks to which the bank is exposed.

Focus on core business
The business model is clear and straightforward: ProCredit Bank focuses on the provision of financial services to small and medium businesses as well as to private clients. The bank applies strict selection criteria and use a holistic approach with its customers. This also includes an individual assessment of ESG (Environmental, Social and Governance) aspects for all business customers. Accordingly, income is generated primarily in the form of interest income on customer loans and fee income from account operations and payments. All of the bank's other operations are performed mainly in support of the core business. ProCredit Bank therefore assumes mainly credit risk, interest rate risk, operational risk and liquidity risk in the course of its day-to-day operations. At the same time, ProCredit avoids or largely limits all other risks involved in banking operations.

Diversification and transparent services
ProCredit's focus as a „Hausbank" for small and medium-sized businesses and private clients entails a very high degree of diversification in both loans and deposits. Geographically, this diversification spans the main business areas of Bulgaria and the Thessaloniki region in Greece. In terms of customer groups, this diversification spans economic sectors, client groups (SMEs and private clients) and income groups. The diversification of the loan portfolio is a central pillar of the bank's credit risk management policy. A further characteristic of the approach is that the bank seeks to provide its clients with simple, easily understandable services. This leads to a high degree of transparency not only for the respective client, but also from a risk management point of view. Both the high degree of diversification and bank's simple, transparent services and processes result in a reduction of the bank's risk profile.

4 Risk management (continued)

b Risk management strategy (continued)

Careful staff selection and intensive training
Responsible banking can only succeed with employees who identify with ProCredit Bank's values and goals, and who actively work to implement them. Therefore, ProCredit group has set strict standards for staff selection and training; these are based on mutual respect, personal responsibility and long-term commitment and loyalty to the ProCredit group. The bank has invested heavily in staff training over many years. The bank's intensive training efforts not only produce a high level of professional competence, but also and above all, they promote an open and transparent communication culture. From a risk perspective, well-trained employees who are accustomed to voicing their opinions openly are an important factor for managing and reducing risk, specifically operational risk and fraud risk.

Key elements of risk management
The risk appetite provides the framework for risk management. This is a conscious decision about the extent to which the bank is prepared to take risks in order to achieve its strategic objectives. The risk appetite is defined for all material risks and is presented in the risk strategy. ProCredit Bank's strong awareness of environmental and sustainability aspects (ESG risks) also informs this process.

Risk management comprises identifying, quantifying, managing, monitoring, controlling and reporting risks. In managing risks, the bank takes account of the German supervisory "Minimum Requirements for Risk Management" (MaRisk), of relevant publications by national and international regulatory authorities and of the knowledge of the markets acquired over many years. The mechanisms designed to hedge and mitigate risks are monitored regularly to ensure their effectiveness, and the procedures and methods used to manage risks are subject to ongoing further development. The key elements of risk management in ProCredit Bank are presented below.

- The annually conducted risk inventory ensures that all material and non-material risks are identified and, if necessary, considered in the strategies and risk management processes.
- All risks assumed are managed to always ensure an adequate level of capital, in both the normative and economic perspective, as well as adequate liquidity levels at all times.
- All ProCredit institutions apply a single common risk management framework, which defines group-wide minimum standards. The risk management policies and standards are approved by the Management of ProCredit Bank and are updated at least annually. These specify the responsibilities at bank and establish minimum requirements for managing, monitoring and reporting.
- Monitoring and control of material risks and possible risk concentrations is carried out using comprehensive analysis tools. For all material risks, early warning indicators (reporting triggers) and limits are set and the corresponding utilisation is monitored. The effectiveness of the chosen measures, limits and methods is continuously checked.
- Regular stress tests are performed for all material risks; stress tests are carried out for each individual risk category as well as across all risk categories.
- Regular and ad-hoc reporting is carried out on the risk profile, including detailed descriptions and commentaries.
- Suitable processes and procedures for an effective internal control system are in place. This 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; this ensures that risk management and risk control are performed independently of front-office functions.

4 Risk management (continued)

b Risk management strategy (continued)

- All new or significantly changed products/services, business processes, instruments, IT systems or organisational structures undergo a thorough analysis (New Risk Approval process) before being implemented or used for the first time. This also applies to activities in new markets and via new distribution channels. This ensures that new risks are assessed and all necessary preparations and tests are completed prior to the introduction of a new or significantly changed product for the first time.

Organisation of the risk management function and risk reporting

The overall responsibility for risk management is assumed by the Management Board of the bank, which regularly analyses the risk profile and decides on the measures to be taken. The risk controlling function required by MaRisk is headed by a member of the Management Board. Risk management is supported conceptually and implemented operationally by the Risk Management Department and Credit Risk Departments and various risk management and finance functions. Various committees support and advise the Management in the performance of the risk management function.

The rules regulating risk management at the bank 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 bank has a compliance management system supported by the bank's Code of Conduct, which is binding for all staff, and by its approach to staff selection and training. The bank's Compliance Officer bears responsibility for the implementation of a group-wide system to ensure fulfilment of all regulatory requirements.

ProCredit Bank has a compliance function, which bears responsibility for adhering to national banking regulations and reports regularly and on an ad-hoc basis to the Management of the bank and to ProCredit Holding. Any conduct, which is inconsistent with the established rules, can be reported anonymously both to an e-mail address established for the ProCredit group, or to an e-mail address on a local level.

Processes and procedures have been implemented to ensure adequate internal control. This system is based on the principles of segregation of duties, dual control and the separation of front and back office for all risk-relevant operations up to the management level; this ensures that risk management and risk control are performed independently of front-office functions. The bank's core values include the Know-Your-Customer (KYC) approach and ethical behaviour, as set out in the Code of Conduct which all employees commit to uphold each year. Internal controls are supported by IT solutions.

Given the increasing digitalisation of front and back-office processes and the regulations on mobile working, the bank pays particular attention to the adequacy of controls. The first line of defence is carried out by the person responsible for the process. They are supported in their controls by the risk management functions, the second line of defence.

4 Risk management (continued)

b Risk management strategy (continued)

Internal Audit, as the third line of defence, is an independent functional area within ProCredit Bank. It provides support in determining what constitutes appropriate risk management, an appropriate internal control system and suitable IT infrastructure within the institution. Additionally, the Internal Audit Department is supported and monitored by ProCredit Group Audit. Once per year, the Internal Audit Department carries out risk assessments of all of the bank's activities in order to arrive at a risk-based annual audit plan. This comprises risk management and risk control processes, including the identification, assessment, control, monitoring and communication of material risks. The risk management system is reviewed accordingly. The Internal Audit Department reports to the Audit Committee of the bank, which generally meets on a quarterly basis. The ProCredit Group Audit team monitors the quality of the audits conducted in ProCredit Bank and provides technical guidance.

The Management of the bank bears responsibility for risk management within the institution. The General Risk Assessment Committee, Credit Risk Management Committee and Operational Risk Management Committee develop the framework for risk management decision taking bodies and monitor the risk profile of the bank and the individual risks. This includes the monitoring of individual risk positions and limit compliance. The Asset and Liability Committee (ALCO) is responsible for monitoring the liquidity reserve and liquidity management and the internal and regulatory capital adequacy of the bank, coordinating measures aimed at securing funding for ProCredit Bank.

Risk positions are analysed regularly, discussed intensively and documented in standardised reports. The Risk Management Department reports regularly to the different risk functions at ProCredit Holding, and the Supervisory Board is informed on at least a quarterly basis about all risk-relevant developments. Monitoring of the bank's risk situation is carried out through a review of these reports and of additional information generated. If necessary, additional ad-hoc reporting occurs for specific topics. The aim is to achieve transparency on the material risks and to be aware at an early stage if potential problems might be arising.

Strong risk awareness on the part of all employees is a core element of risk management. This awareness supports the ability of organisational units and committees to provide timely information to the Management on relevant risk events and on the risk profile of the bank. Training programmes are conducted to strengthen capacity in all areas of risk management. Moreover, regular group-wide meetings and training events are held to support the exchange of best practices and the development and enhancement of risk management.

Management of Individual Risks

The material risks for ProCredit Bank are credit risk, market risks (foreign currency risk and interest rate risk), liquidity and funding risk, operational risk, risks arising from money laundering, terrorist financing and other acts punishable by law, business risk and model risk.

ESG risks are environmental, social or corporate governance events or conditions whose occurrence may have an actual or potential negative impact on financial position and financial performance as well as on reputation. The bank deliberately does not give separate treatment to ESG risks, as it would hardly be possible to isolate such risks. Managing ESG risks is an integral part of the business strategy. ESG risks can have a material impact on all of the identified risks, contributing as a factor in their materiality. The bank assumes that ESG risks have the greatest impact on credit risk arising from business with clients, i.e. the impact that ESG risks have on the clients and the corresponding business models and thus on their ability to survive.

4 Risk management (continued)

b Risk management strategy (continued)

The management of material risks in the ProCredit group is described in greater detail in the following section.

c Credit risk

The bank defines credit risk as the risk that losses will be incurred if the party to a transaction cannot fulfil its contractual obligations at all, not in full or not on time. Within overall credit risk the bank distinguishes between customer credit risk, counterparty risk (including issuer risk) and country risk. Credit risk is the most significant risk facing ProCredit Bank, and customer credit exposures account for the largest share of that risk.

Maximum exposure to credit risk

Exposure types	31 Dec 2022	31 Dec 2021
Loans and advances to banks	**245,476**	**122,085**
Investment securities (FVOCI)	**65,393**	**61,455**
Fixed interest rate debt securities	65,393	61,455
Loans and advances to customers, net	**2,765,747**	**2,359,983**
Loans and advances to customers, net	2,765,747	2,359,983
Other assets	**7,200**	**3,778**
Other financial assets	7,200	3,778
Contingent liabilities and commitments	**595,998**	**480,794**
Guarantees	110,978	67,962
Letters of credit	2,705	2,456
Credit commitments (revocable loan commitments)	482,315	410,376

Customer credit risk

The key objectives of credit risk management are to achieve high loan portfolio quality, low risk concentrations within the loan portfolio and appropriate coverage of credit risks with loan loss provisions. Thanks to the diversification of operations across and to the experience that ProCredit Bank has gained over the past years, the bank has extensive expertise with which to limit customer credit risk effectively.

ProCredit Banks serves a clear target group. It ranges from relatively small business clients with increasingly formalised structures to larger SMEs. For the lending operations, the bank applies the following principles, among others:

- Intensive analysis of the debt capacity and repayment capacity of borrowers, taking account for expected future cash flows as well as assessing ESG aspects.
- Carefully documenting credit risk analyses and processes conducted during lending operations, ensuring that the analyses performed can be understood by knowledgeable third parties.
- Strictly avoiding over indebtedness among the loan clients.
- Building a long-term relationship with the client, maintaining regular contact and documenting the development of the exposure in the regular monitoring reports.
- Strictly monitoring the repayment of credit exposures

4 Risk management (continued)

c Credit risk (continued)

- Applying closely customer-oriented, intensified loan management in the event of arrears.
- Collateral collection in the event of insolvency.

The framework for managing customer credit risk is presented in the relevant policies and standards. The policies specify, among other things, the responsibilities for managing credit risk, the principles for the organisation of the lending business, the principles involved in lending operations, and the framework for the valuation of collateral for credit exposures. The standards contain detailed explanations of the bank's lending operations with business clients and private clients and of the range of credit offered. They also set forth the rules governing restructuring, risk provisioning and write-offs. Thus, the policies and standards define risk-mitigating measures for the pre-disbursement phase (credit risk assessment, consideration of ESG aspects) and the post-disbursement phase (e.g. regular monitoring of the financial situation, review of early warning indicators, and both intensified and problem loan management).

The bank divides its credit exposures into three categories: small and medium-sized business credit exposures and credit exposures to private clients. Small exposures are between EUR 50,000 and EUR 500,000. There are two sub-categories of Small credit exposures: Lower Small credit exposures up to EUR 250,000 and Upper Small credit exposures, which do not exceed EUR 500,000. Medium exposures are above EUR 500,000. There are two sub-categories of Medium credit exposures: Lower Medium credit exposures are credit exposures that do not exceed EUR 1,500,000 and Upper Medium credit exposures are credit exposures over EUR 1,500,000. 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: The 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 separation of front and back office functions up to the management level is applied for exposures over EUR 250,000.

The experience of the bank has shown that a thorough creditworthiness assessment constitutes the most effective form of credit risk management. The credit decisions are therefore based predominantly on an analysis of the client's financial situation and creditworthiness. ProCredit Bank maintains regular contact with its clients, including regular on-site visits to ensure that the bank gives adequate consideration to their specific features and needs.

All credit decisions are taken by 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 offices. The only exception is for the clients in Lower small segment (up to 250 000 EUR) with Risk classification from 1 to 4 (good risk profile) and an assessment based on financial statements with standard documentation, in which case the decision is taken without the participation of Credit Risk Department in head office. The Credit Committee consists of 3 persons - Business Clients Adviser (BCA), Branch Manager (BM) and Deputy Branch Manager (DBM) with the respective authorization rights. If the case is more complicated and the branch's management considers that they need additional support in the analysis of the business, the BCA could send the case to the Credit Risk Department. If the exposures are particularly significant on account of their size, the decision is confirmed by the Supervisory Board of the bank, usually following a positive vote issued by the responsible Group Credit Risk Management team at ProCredit Holding.

4 Risk management (continued)

c Credit risk (continued)

The most important basis for decision-making within the credit committee is the proposal for the financing and collateral structure, which is tailored to the customers' needs and dependent on their risk profile. In this context, the main parameters that affect the security are the loan exposure, maturity of the loan, quality of the documentation, provided by the client, and risk classification.

The credit risk management policies limit the possibility for unsecured credit operations. Depending on the risk profile and the maturity of the exposure, loans may also be disbursed without being fully collateralised. As a general rule, credit exposures are covered with collateral security, mostly through immovable property.

As a rule, the valuation of collateral is based on assessments conducted by external, independent experts. In order to ensure that a reduction in the value of the collateral is detected at an early stage and appropriate measures can be taken, plausibility checks of the collateral value are performed when there are indicators of impairment and at least annually. The appraisals must be updated at regular intervals, with plausibility checks being carried out by specialised bank’s staff.

Based on the bank’s collateralisation requirements, securing loans with immovable properties is among the most important instruments for limiting credit risk. Although the largest share is concentrated in real estate, its distribution by individual purpose, location and associated market is diversified across regions and economic sectors, similar to the distribution of the loan portfolio of the bank. In this context, the concentration risk via collateral is considered to be low. The distribution of the loans and advances to customers by type of collateral is presented in the table below:

Collateral held	**31 Dec 2022**	**31 Dec 2021**
Mortgage	42%	45%
Guaranties from the EIF	23%	23%
Machines and vehicles	8%	7%
Cash collateral	7%	5%
Other types of collateral	5%	8%
Without collateral	15%	12%
Total	**100%**	**100%**

The table below sets out the carrying amount and the value of identifiable collateral held against loans and advances to corporate customers measured at amortised cost, other than reverse sale-and-repurchase agreements. For each loan, the value of disclosed collateral is capped at the nominal amount of the loan that it is held against.

	2022		**2021**	
	Gross carrying amount	Collateral	Gross carrying amount	Collateral
Stages 1 and 2	2,780,790	2,234,432	2,359,712	1,928,447
Stage 3 & POCI	29,132	27,107	39,465	36,493

The following table stratifies credit exposures housing loans to retail customers by ranges of loan-to-value (LTV) ratio. LTV is calculated as the ratio of the gross amount of the loan to the value of the collateral. The valuation of the collateral excludes any adjustments for obtaining and selling the collateral. The value of the collateral for residential mortgage loans is based on the collateral value at origination updated based on changes in house price indices.

4 Risk management (continued)

c Credit risk (continued)

LTV ratio	31 Dec 2022	31 Dec 2021
Less than 50%	39,641	35,582
51%-70%	49,360	45,308
71%-90%	89,010	69,719
90%-100%	36,039	37,833
More than 100%	48,825	49,883
Total	**262,875**	**238,325**

The bank 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") / European Investment Fund ("EIF") to improve access to finance for Micro, Small and Medium-sized Enterprises in the EU. Two more programs for financing of SMEs were launched in 2016 jointly with the EIF – InnovFin SME Guarantee Facility and SME Initiative Guarantee Facility. The subloans disbursed under the programs are partially guaranteed by the ("the EIF").

In 2020 there was an extension of the InnovFin program for a portfolio of loans to SMEs including COVID-19 support transactions. During 2020 new guarantee programs with the EIF were launched: JEREMIE Bulgaria - Documentary Finance Guarantee for a portfolio of loans and documentary operations, ESIF EAFRD Greece for a portfolio of loans to agricultural producers and ESIF ERDF Greece for a portfolio of loans to SMEs. New guarantee programs with the EIF was launched in 2021 under the Pan European Guarantee Fund for a portfolio of loans to SMEs. Additionally, in Greece guarantee agreement was signed with the Hellenic Development Bank (HDB) for a portfolio of loans to SMEs. The total customers loan portfolio outstanding under the programs described above were BGN 696,318 thousand as of end 2022 (2021: BGN 564,831 thousand).

The early detection of increases in credit risk at the level of a credit exposure is incorporated into all lending-related processes, resulting in rapid assessment of the degree of financial difficulty faced by clients. This is done at the individual customer level and for a specific part of the loan portfolio (e.g. for clients in a specific industry or region) based on the currently available and relevant information such as customer financial data or market information.

Supplementary to that assessment, the bank has early warning indicators based on quantitative and qualitative risk features; these indicators are implemented and monitored at portfolio level. These are in part client-specific and include: declining account turnover or balance, high usage of granted credit lines and overdrafts over a longer period of time, blocked bank accounts, arrears, and changes in the ownership structure or registered address of the business. In addition, the bank identifies potential risks for customers with common risk factors, such as those arising from specific economic sectors or geographical regions. Such risk factors can also lead to limits on exposures to certain groups of customers. If the bank cannot rule out an increase in the credit risk of a customer, they are added to a watch list and monitored regularly and more carefully; this acts as a preliminary stage of intensified management. Regular recording and analysis of these early warning indicators helps to manage the portfolio, identify default risks at an early stage and take the required measures to avoid a significant increase in credit risk. Reports on the affected portfolio are regularly given to branch management, the bank's head office and in aggregated form to ProCredit Holding. 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.

4 Risk management (continued)

c Credit risk (continued)

Compared to the previous year, the direct negative impacts in connection with the COVID-19 pandemic have decreased significantly. Overall, the bank assesses the impact of the COVID-19 pandemic on our loan portfolio in the 2022 financial year to be minor. This is also reflected in our continuous observations regarding the quality indicators implemented for the loan portfolio, which reported further improvement. Instead, the focus of the observations at portfolio level is on an expected deterioration in macroeconomic conditions, mainly resulting from the impact of the war in Ukraine on the global economy.

The war has had an impact on many other economies, as sanctions and naval blockades have also led to shortages in food and energy supplies. The bank conducted a detailed analysis of the loan portfolios in order to assess any impacts on its business activities caused by the war in Ukraine or the sanctions against Russia and Belarus. As a result, loans to customers with significant relationships with these countries were identified. These exposures accounted for approximately BGN 28.6 million or 1.0% of the bank's loan portfolio as of the balance sheet date. For the most part, these customers were able to adjust their business relationships accordingly and mitigate potential risks. Neither the sanctions nor the indirect effects of the war have resulted in a significant change in riskiness or an adjustment to loss allowances for the bank’s clients.

In addition, the bank analysed loans to customers from economic sectors that it considers to be at risk. In doing so, ProCredit Bank analysed and assessed second-round effects on customers from sectors that could be exposed to potential impacts from supply chain disruptions, economic slowdowns, inflation, and energy availability. A particularly crucial aspect of the survey results was the potential impact of rising energy prices on the loan portfolio; here, the identified customers from energy-intensive industries in combination with deteriorating financials. As a result of this process, exposures amounting to BGN 15.3 million were transferred to Stage 2.

The institution continuously monitors the dynamics of the economic and geopolitical environment, analysing the impact it has on the social and economic situation and the resulting effects on the Bank's activities. In order to adequately manage the credit risk, the institution carries out assessments and simulations of the exposure of the bank to any risks that may result from the external factors of the environment.

On the basis of asset quality indicators, the loan portfolio is divided into categories: performing, underperforming and default. This categorisation is based on a risk classification system that takes account for repayment arrears as well as other risk characteristics, including the initiation of bankruptcy or legal proceedings, restructurings or collateral liquidations by other banks. In addition, other factors which indicate a significant deterioration of the economic situation of the client can also play a role. The portfolio indicators allow for a clear overview of the quality of the bank’s portfolio, and represent one of the most important tools for the credit risk management process. The indicators and the associated internal processes are defined in accordance with the requirements of the European Banking Authority. The categories are as follows:

- **The performing loan portfolio** shows no signs of a potential risk increase. Although some exposures show early warning signals, these may not necessarily result in a risk increase being determined.
- **The underperforming loan portfolio** comprises exposures showing increased credit risk. This can be caused by temporary payment difficulties (30-90 days) or restructuring, or by a deterioration in the financial circumstances of clients, as expressed through an adjustment of the risk classification. Nevertheless, the bank still assesses full repayment of the exposure to be possible, e.g. after restructuring.

4 Risk management (continued)

c Credit risk (continued)

- **The default loan portfolio** comprises all exposures in default, pursuant to the regulatory definition of default (Regulation (EU) No. 575/2013 under (EU) 2019/876 (CRR II), Art. 178), that have shown lasting payment difficulties (over 90 days) or other indications. These include, among other factors, when the borrower is highly unlikely to meet their loan obligations to the bank in full or when insolvency proceedings have been initiated. Further details are provided below.

Once a higher risk of default is detected for a credit exposure, it is placed under intensified management and assigned to the underperforming category. This centres on close communication with the client, identification of the source of higher credit default risk and close monitoring of their business activities. Decisions on measures to reduce the credit default risk are taken by the authorised decision-making bodies (e.g. Credit Committee on Restructuring). In addition, specialised recovery officers may be called in to support the intensified management of the credit exposure.

One of the first steps in managing such exposures is to determine the current economic and financial situation of the client, as this is the most important basis for decisions on whether or not the exposure can be restructured. The aim is to take such decisions at an early stage, while the chances of stabilisation are high and before the exposure enters an advanced phase of payment delay.

When a credit exposure is classified as defaulted, specialised officers take over responsibility for dealings with these loans. Based on the prospects for the customer, a strategy is developed with the goal of either restructuring or exiting the exposure. These officers are supported by specialists in settlement and liquidation (legal unit). In the event of collateral realisation, items are sold through liquidation to a third party at the highest possible price, typically via public auction. The majority of the collateral sold consists of immovable property such as land or buildings.

Loss allowances

The expected credit loss (ECL) model pursuant to IFRS 9 is the central element of the approach to quantifying loss allowances for both on- and off-balance sheet financial instruments and continues to be optimised. The calculated loss allowances are determined based on the expected credit losses for several future default scenarios. This represents the combined sum of the probability-weighted results from the scenarios. ECL estimates are based on reliable information about past events, current conditions and projections of future economic conditions. A detailed description of the model specifications is provided below.

Three-stage approach

At each reporting date, all credit exposures to customers are allocated among the three stages described below, based on changes in credit quality since initial recognition and with a distinct provisioning methodology applied to each stage. Exposures may move between stages during their lifetime.

4 Risk management (continued)

c Credit risk (continued)

- **Stage 1** comprises exposures for which credit risk as of the reporting date has not significantly increased since initial recognition, and for which there is thus no indication of a trigger for allocation to Stage 2 or Stage 3; this also includes exposures which have been re-assigned to Stage 1 from other stages. Generally, all exposures are allocated to Stage 1 upon initial recognition, with the exception of those categorised as POCI (Purchased or Originated Credit Impaired). For Stage 1 exposures, the expected credit losses arising from possible default events within a period of up to 12 months following the reporting date are recognised in expenses. For receivables with a remaining term of less than 12 months, the shorter contractual maturity is applied.
- **Stage 2** comprises exposures for which credit risk as of the reporting date has significantly increased since initial recognition, but for which there are no objective indications of impairment; this also includes exposures which have been re-assigned to Stage 2 from Stage 3. Loss allowances are established in an amount equivalent to the expected credit losses over the entire remaining maturity.
- **Stage 3** includes all defaulted exposures (except POCI); i.e. as of the reporting date, there are objective indications of impairment. The respective calculation of loss allowances is performed based on the expected credit losses over the entire remaining maturity considering 100% probability of default.
- POCI exposures refer to defaulted exposures; however, they are recorded separately and are differentiated from other exposures in Stage 3 in the recognition of loss allowances.

Calculation of ECL

Expected credit losses are calculated using the following main parameters:

Exposure at default (EAD):
EAD is the expected exposure amount at the time of a loan default; it is derived from the currently outstanding receivable from the customer and possible future changes under the applicable contractual conditions. Thus, the EAD consists of the expected exposures (including credit risk from off-balance sheet business) at the time of default. For exposures with regular repayment plans, the modelled EAD is adjusted for the expected possibility of early repayment based on historical observations and on scenarios for the development of the economic environment and associated future forecasts. For potential exposures that may arise in the future from the utilisation of existing credit commitments, such as credit lines or overdraft facilities, conversion factors are estimated based on empirical analysis of historical data; for payment guarantees and letters of credit, a conversion factor of 100% or 50%, respectively, is set on the basis of professional judgment.

Probability of default (PD):
The probability of a loan default within a certain period of time is derived from historical default events. These data include the time, type and amount of default as well as information about the characteristics of the customer from our internal risk classification system. The parameters are country-specific and differentiate the risk levels of exposures according to the customer segments defined at bank level. The bank uses statistical models, developed by ProCredit Holding, to analyse the collected data and make forecasts for the expected PD based on scenarios for the development of the economic environment (PiT estimate). In addition, the PDs over the remaining lifetime of an exposure are estimated.

4 Risk management (continued)

c Credit risk (continued)

Loss given default (LGD):
The expected LGD is based on historical data about recoveries obtained from defaulted customers. LGDs are calculated as discounted cash flows, taking into account the cost of recovery and the size of the credit exposure. Estimated LGDs are modelled as forward-looking forecasts that account for the assumed scenarios about the development of the economic environment.

Input data for the assessment of credit risk parameters are based on multi-year data histories for all borrowers in the bank. The influence of customer-specific risk characteristics and macroeconomic factors on the selected parameters is determined through regression analysis. The multi-stage selection process for relevant macroeconomic factors, which address various dimensions of the economic environment (economic performance, inflation, unemployment, interest rate environment, currency strength, energy prices), is based on professional discretion, their statistical significance and economic relevance. Publications of the International Monetary Fund (IMF), the Economist Intelligence Unit (EIU) and the European Central Bank (ECB) are used as data sources for the historical data and forecasts of the following relevant macroeconomic factors: GDP, inflation, unemployment rate, lending rate, purchasing power parity, gas and oil price index. In order to establish the ECL parameters, a probability-weighted average value is calculated based on various scenarios for the macroeconomic factors.

The calculation of loss allowances is automated and parameter-based for exposures in Stage 1 and Stage 2 as well as individually insignificant Stage 3 exposures. Loss allowances for individually significant Stage 3 exposures are estimated by credit analysts.

The adjustments to macroeconomic factors that were made in the two previous years in establishing loss allowances in the context of the COVID-19 pandemic have now been reversed, as the risks from the pandemic have now materialised in the meantime. ProCredit Bank is taking account for risks arising from the currently tense economic situation by making new adjustments to the parameters.

The current macroeconomic forecasts from the IMF World Economic Outlook Database and the EIU were used in establishing loss allowances. The parameters are calculated by weighting the three scenarios (base/pessimistic/optimistic), with the base scenario normally weighted at 50% and the alternative scenarios at 25%. The weighting was adjusted to reflect the assessment of a currently tense macroeconomic situation. A detailed description can be found in the section on overlays.

Bulgaria	GDP growth in %		Inflation rate in %		Change in credit interest rate in %			Change in oil price in %	Weight
	2022	2023	2023	2024	2022	2023	2024	2024	
Baseline scenario	3.9	3.0	2.4	2.0	0.1	0.1	0.2	-5.7	50%
Downside scenario	2.6	1.6	6.7	6.3	0.6	0.6	0.7	13.7	40%
Upside scenario	6.0	5.0	-1.2	-1.6	-0.5	-0.4	-0.3	-24.7	10%

The loss allowance sensitivity is analysed in terms of the influence of relevant macroeconomic factors. Sensitivity is calculated by simultaneously increasing or decreasing all the applied macroeconomic model factors by 10%, depending on the expected direction of the factor's impact, in order to simulate a positive or negative macroeconomic environment. The following table presents the loss allowances for the bank with the respective macroeconomic changes.

4 Risk management (continued)

c Credit risk (continued)

in BGN thousands	Year	Loss allowance Positive macroeconomic change	Loss allowance	Loss allowance Negative macroeconomic change
Total loss allowance	2022	42,598	44,175	45,390

Changes in the above assumptions can lead to changes in the calculated loss allowances over time. The ProCredit group acknowledges that discretionary decisions of the Management and estimation uncertainties can have a significant impact on the establishment of loss allowances for collectively and individually assessed exposures. Such discretion is based on the applied definition of default, the approach to determining a significant increase in credit risk (SICR) and the selected macroeconomic factors.

Significant increase in credit risk
When determining whether or not a significant increase in credit risk (SICR) has occurred, both quantitative and qualitative information is used.

The quantitative test for SICR consists of a comparison between the expected PD over the remaining lifetime as of the reporting date and the expected PD over the corresponding time period at initial recognition. A significant increase in credit risk is deemed to exist if the difference between these two PDs exceeds a certain limit by a factor of 2.5. In this case, the respective financial instrument is transferred from Stage 1 to Stage 2. Conversely, a transfer from Stage 2 to Stage 1 is possible once the associated credit risk is no longer significantly elevated.

In addition, qualitative criteria are used for SICR decisions. A transfer from Stage 1 to Stage 2 is made when one of the following criteria is met:
- Contractual payments are past due by more than 30 days but not more than 90 days.
- Classification of the loan as “restructured” (forbearance) pursuant to internal policies (adjustment of contractually agreed conditions).

Impaired credit exposures
If a credit exposure is deemed to be impaired, it is transferred to Stage 3 accordingly. The definition of impairment according to IFRS 9 corresponds to the definition used for the Defaulted portfolio in internal risk management, and thus also the regulatory definition of default (Regulation (EU) No. 575/2013 under (EU) 2019/876 (CRR II), Art. 178). This default definition is applied to all exposures which are part of the loan portfolio of the bank. The bank considers an exposure to be impaired if at least one of the criteria of the default definition is met and the expected cash flows have been negatively impacted to such an extent that full repayment of the receivable can no longer be assumed.

A credit exposure is considered impaired and is thus transferred to Stage 3 if one of the following criteria applies at the reporting date:
- Contractual payments are more than 90 days past due.
- Indications of significant financial difficulties of the debtor.
- Loan repayment is not possible without the realisation of collateral.
- Initiation of bankruptcy proceedings for the customer.
- Legal proceedings against the customer that endanger the existence of the business or the repayment capacity of the customer.
- Allegations of fraud against the customer.

4 Risk management (continued)

c Credit risk (continued)

When determining loss allowances in Stage 3, a distinction is drawn between individually significant and individually insignificant credit exposures; the threshold on a group of borrowers' level is EUR 150,000. For significant exposures with indications of impairment, an individual assessment is performed to determine loss allowances, taking account for probability-weighted expected inflows in various scenarios, including collateral liquidation. The bank places strong emphasis on taking a careful approach to cost estimates and expected proceeds, as well as to the assumptions about the duration of collateral realisation. For individually insignificant exposures, loss allowances are determined using parameters for the collective assessment of credit risk.

Returning an exposure from Stage 3 to a lower stage is possible if the customer can settle outstanding debts in full without recourse to collateral realisation. No migration between stages is possible for POCI exposures.

Purchased or Originated Credit Impaired (POCI) assets
In line with IFRS guidelines, the bank performs separate recognition of POCI (Purchased or Originated Credit Impaired) exposures. Within the institution's business model, the acquisition of impaired exposures is not permitted. Accordingly, POCI exposures can only arise in the course of a new negotiation through significant modification of the contractually agreed cash flows. For POCI exposures, no allowances for impairment are made at the time of initial recognition. In subsequent periods, all changes with regard to the expected losses over the remaining maturity period (lifetime ECL) are recognised as an expense in the income statement and reported accordingly as loss allowances for these exposures.

Changes to contractual terms (modifications)
Changes to the originally agreed contractual conditions of an exposure are possible, in particular with the aim of improving the prospects of repayment and, if possible, avoiding default, foreclosure or the realisation of collateral. The bank uses qualitative and quantitative factors to determine the existence of a substantial modification of contractual conditions. As a quantitative factor, the net present value of cash flows is determined in order to assess the changed conditions of an exposure (net present value test). In the event of a substantial change, the original contract is derecognised and a new exposure is recognised at the fair value at the time of modification. In the case of a non-substantial change, the gain or loss is recognised through profit or loss.

Write off
When a loan is uncollectible, it is written off against the corresponding loss allowance which has been set aside, provided there is no justified expectation of repayment. The direct and indirect costs of actively managing credit exposures that have not been written off must be in proportion to the size of the outstanding exposure.

The bank performs an assessment for specific individual impairment for credit exposures of any size if there is no reasonable expectation of recovery. The bank carries out such an assessment at the latest when exposures reach 180 days past due for exposures up to EUR 10,000, and at the latest by 360 days for exposures above EUR 10,000, in particular if they are not collateralised. Depending on the assessment outcome, the bank may decide to write off or keep the credit exposure active to allow for an ongoing recovery.

4 Risk management (continued)

c Credit risk (continued)

The following table provides an overview of the respective gross and net exposure amounts and loss allowances for financial assets, broken down by stages:

As of 31 Dec 2022	Stage1 12 month ECL	Stage 2 Lifetime ECL	Stage 3 Lifetime ECL	POCI	Total
Gross outstanding amount	2,676,182	104,608	28,455	677	**2,809,922**
Loss allowances	(22,807)	(4,353)	(16,918)	(97)	**(44,175)**
Carrying amount	**2,653,375**	**100,255**	**11,537**	**580**	**2,765,747**

As of 31 Dec 2021	Stage1 12 month ECL	Stage 2 Lifetime ECL	Stage 3 Lifetime ECL	POCI	Total
Gross outstanding amount	2,312,805	46,907	38,714	751	**2,399,177**
Loss allowances	(15,694)	(2,648)	(20,842)	(10)	**(39,194)**
Carrying amount	**2,297,111**	**44,259**	**17,872**	**741**	**2,359,983**

4 Risk management (continued)

c Credit risk (continued)

The following table presents gross and net exposures, broken down according to economic sector and by stage.

As of 31 December 2022	Business loans					Private loans			Total
	Wholesale and retail trade	Agriculture, forestry and fishing	Production	Transportation and storage	Other economic activities	Housing	Investment loans and OVDs	Other	
Stage 1									
Gross outstanding amount	404,284	526,110	363,023	128,174	915,112	261,916	24,872	52,691	**2,676,182**
Loss allowances	(2,995)	(2,949)	(4,024)	(725)	(8,857)	(2,237)	(273)	(747)	**(22,807)**
Carrying amount	**401,289**	**523,161**	**358,999**	**127,449**	**906,255**	**259,679**	**24,599**	**51,944**	**2,653,375**
Stage 2									
Gross outstanding amount	11,068	17,833	38,256	1,304	35,771	198	-	178	**104,608**
Loss allowances	(589)	(818)	(1,544)	(46)	(1,324)	(26)	-	(6)	**(4,353)**
Carrying amount	**10,479**	**17,015**	**36,712**	**1,258**	**34,447**	**172**	**-**	**172**	**100,255**
Stage 3									
Gross outstanding amount	7,355	2,485	7,940	443	9,014	761	52	405	**28,455**
Loss allowances	(4,300)	(1,333)	(4,339)	(320)	(5,886)	(398)	(26)	(316)	**(16,918)**
Carrying amount	**3,055**	**1,152**	**3,601**	**123**	**3,128**	**363**	**26**	**89**	**11,537**
POCI									
Gross outstanding amount	-	-	-	-	677	-	-	-	**677**
Loss allowances	-	-	-	-	(97)	-	-	-	**(97)**
Carrying amount	**-**	**-**	**-**	**-**	**580**	**-**	**-**	**-**	**580**

As of 31 December 2021	Business loans					Private loans			Total
	Wholesale and retail trade	Agriculture, forestry and fishing	Production	Transportation and storage	Other economic activities	Housing	Investment loans and OVDs	Other	
Stage 1									
Gross outstanding amount	375,437	432,957	384,262	103,115	740,257	235,291	36,606	4,880	**2,312,805**
Loss allowances	(1,943)	(2,230)	(2,339)	(511)	(5,740)	(2,401)	(492)	(38)	**(15,694)**
Carrying amount	**373,494**	**430,727**	**381,923**	**102,604**	**734,517**	**232,890**	**36,114**	**4,842**	**2,297,111**
Stage 2									
Gross outstanding amount	6,347	15,359	14,517	1,215	8,828	540	73	28	**46,907**
Loss allowances	(355)	(601)	(719)	(69)	(826)	(70)	(7)	(1)	**(2,648)**
Carrying amount	**5,992**	**14,758**	**13,798**	**1,146**	**8,002**	**470**	**66**	**27**	**44,259**
Stage 3									
Gross outstanding amount	10,257	3,717	4,011	2,694	15,058	2,494	416	67	**38,714**
Loss allowances	(4,018)	(1,777)	(1,851)	(1,570)	(9,519)	(1,762)	(289)	(56)	**(20,842)**
Carrying amount	**6,239**	**1,940**	**2,160**	**1,124**	**5,539**	**732**	**127**	**11**	**17,872**
POCI									
Gross outstanding amount	-	-	-	-	751	-	-	-	**751**
Loss allowances	-	-	-	-	(10)	-	-	-	**(10)**
Carrying amount	**-**	**-**	**-**	**-**	**741**	**-**	**-**	**-**	**741**

Credit risk at the portfolio level is assessed on a quarterly basis and, if necessary, more frequently. This includes an analysis of portfolio structure and quality, restructured exposures, write offs, the coverage ratio (risk provisions in relation to past-due portfolio) and concentration risk.

Concentration risk in the customer loan portfolio is limited by a high degree of diversification. This diversification is a consequence of lending to small and medium businesses in various economic sectors and to private clients. Geographically, the loans and advances to customers are disbursed to clients, which are Bulgarian or Greek residents.

4 Risk management (continued)

c Credit risk (continued)

In addition, ProCredit Bank limits the concentration risk of its portfolios by means of the following requirements: large credit exposures (those exceeding 10% of regulatory capital) require the coordination with the ProCredit Group Credit Risk Management Committee and approval of the Supervisory Board of the bank. No large credit exposure may exceed 25% of regulatory capital, and the sum of all large credit exposures may not exceed 150% of its regulatory capital. The largest credit exposure of the bank was 15% of the regulatory capital as of end 2022.

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, if necessary, that appropriate measures are taken in a timely manner.

The bank'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 bank to cover client credit risk in extremely negative circumstances.

The bank monitors concentration of risk by economic sector and geographic location. Analyses of concentrations of credit risk is shown below. 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.

As of 31 December 2022	Gross loans <= 50,000 EUR	Gross loans >50,000 <= 250,000 EUR	Gross loans > 250,000 EUR	Total gross loans
Business loans	**111,373**	**667,222**	**1,690,254**	**2,468,849**
Wholesale and retail trade	21,974	138,796	261,937	422,707
Agriculture, forestry and fishing	43,407	236,714	266,307	546,428
Production	11,819	100,909	296,491	409,219
Transportation and storage	11,106	46,150	72,665	129,921
Other economic activities	23,067	144,653	792,854	960,574
Private loans	**88,926**	**214,954**	**37,193**	**341,073**
Housing	29,383	197,271	36,221	262,875
Investment loans and OVDs	10,540	13,412	972	24,924
Others	49,003	4,271	-	53,274
Customer loan portfolio (gross)	**200,299**	**882,176**	**1,727,447**	**2,809,922**

As of 31 December 2021	Gross loans <= 50,000 EUR	Gross loans >50,000 <= 250,000 EUR	Gross loans > 250,000 EUR	Total gross loans
Business loans	**111,426**	**599,294**	**1,408,062**	**2,118,782**
Wholesale and retail trade	21,641	123,571	246,829	392,041
Agriculture, forestry and fishing	48,943	212,250	190,840	452,033
Production	11,929	101,598	289,263	402,790
Transportation and storage	10,973	46,689	49,362	107,024
Other economic activities	17,940	115,186	631,768	764,894
Private loans	**76,217**	**176,891**	**27,287**	**280,395**
Housing	36,291	174,747	27,287	238,325
Investment loans and OVDs	35,036	2,059	-	37,095
Others	4,890	85	-	4,975
Customer loan portfolio (gross)	**187,643**	**776,185**	**1,435,349**	**2,399,177**

4 Risk management (continued)

c Credit risk (continued)

The tables below presents the customer loan portfolio and contingent liabilities and commitments split by risk classification, applied by the bank.

As of 31 December 2022

Loans and advances to customers	Stage 1	Stage 2	Stage 3	POCI	Total
Grades 1-5: Performing	1,871,879	69,104	-	-	1,940,983
Grades 6-7: Underperforming	16,920	34,945	-	-	51,865
Grade 8: Credit-impaired	-	-	27,121	677	27,798
Non-rated exposures	787,383	559	1,334	-	789,276
Gross carrying amount	**2,676,182**	**104,608**	**28,455**	**677**	**2,809,922**

As of 31 December 2021

Loans and advances to customers	Stage 1	Stage 2	Stage 3	POCI	Total
Grades 1-5: Performing	1,683,743	12,634	-	-	1,696,377
Grades 6-7: Underperforming	14,118	33,554	-	-	47,672
Grade 8: Credit-impaired	-	-	35,079	751	35,830
Non-rated exposures	614,944	719	3,635	-	619,298
Gross carrying amount	**2,312,805**	**46,907**	**38,714**	**751**	**2,399,177**

As of 31 December 2022

Contingent liabilities and commitments (Note 31)	Stage 1	Stage 2	Stage 3	IAS37 contracts	Total
Grades 1-5: Performing	434,099	26,557	20	78,412	539,088
Grades 6-7: Underperforming	17	1,013	0	34	1,064
Grade 8: Credit-impaired	0	0	587	7	594
Non-rated exposures	48,873	74	1	6,304	55,252
Gross carrying amount	**482,989**	**27,644**	**608**	**84,757**	**595,998**

As of 31 December 2021

Contingent liabilities and commitments (Note 31)	Stage 1	Stage 2	Stage 3	IAS37 contracts	Total
Grades 1-5: Performing	371,815	2,446	31	39,763	414,055
Grades 6-7: Underperforming	10	91	1	189	291
Grade 8: Credit-impaired	0	0	564	7	571
Non-rated exposures	59,098	10	2	6,767	65,877
Gross carrying amount	**430,923**	**2,547**	**598**	**46,726**	**480,794**

Non-rated include exposures to private clients or exposures to enterprises which are lower than EUR 50,000. The following table breaks down the Bank's financial instruments at their carrying amounts, as categorized by geographical region as of 31 December:

As of 31 December 2022	Bulgaria	Greece	Germany	Romania	Total
Assets					
Loans and advances to banks	-	6	235,674	9,796	245,476
Investment debt securities (FVOCI)	51,981	-	13,412	-	65,393
Loans and advances to customers, net	2,105,733	660,014	-	-	2,765,747
Other financial assets	6,376	824	-	-	7,200
Total assets	**2,164,090**	**660,844**	**249,086**	**9,796**	**3,083,816**
Contingent liabilities and commitments (Note 31)	536,240	59,758	-	-	595,998

4 Risk management (continued)

c Credit risk (continued)

As of 31 December 2021	Bulgaria	Greece	Germany	Romania	Total
Assets					
Loans and advances to banks	38,337	6	83,742	-	122,085
Investment debt securities (FVOCI)	61,455	-	-	-	61,455
Loans and advances to customers, net	1,823,473	536,510	-	-	2,359,983
Other financial assets	3,477	301	-	-	3,778
Total assets	**1,926,742**	**536,817**	**83,742**	**-**	**2,547,301**
Contingent liabilities and commitments (Note 31)	418,004	62,790	-	-	480,794

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 bank 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 bank 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 bank defines counterparty risk, including issuer risk, as the risk that a counterparty/issuer cannot fulfil its contractual obligations at all, not in full or not on time. Counterparty risk in the bank mainly arises from keeping highly liquid assets for the purpose of managing liquidity. There are also structural exposures towards the BNB and the Bank of Greece in the form of mandatory minimum reserves.

Typically, the bank’s counterparties are the BNB, the Bank of Greece, the Bulgarian Government and commercial banks. The main types of exposure are account balances, short-term time deposit accounts (TDAs), highly liquid securities, and, on a very limited scale, simple derivative instruments for liquidity management and hedging purposes (mostly foreign currency forwards and swaps). The bank limits counterparty and issuer risk within through its conservative investment strategy. The bank expects to further diversify and balance the placements of excessive liquidity with its counterparties in 2023.

The framework for managing the counterparty risk is approved by the Management of the bank 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.

4 Risk management (continued)

d Counterparty risk, including issuer risk (continued)

Counterparty risk is managed according to the principle that the bank's liquidity must be placed securely and, to the greatest extent possible, in a diversified manner. While the bank tries to generate some income from these assets, the overriding objective is to ensure secure placement and timely availability, i.e. risk considerations predominate. For this reason, the bank only works with carefully selected reliable banks which normally have high credit ratings, typically places its money for short terms (up to three months, but typically shorter) and uses only a very limited number of simple financial instruments.

Issuer risk is likewise managed according to these principles. The bank is prohibited from engaging in speculative trading. As a matter of principle, only highly liquid securities are bought, typically with a maximum maturity of three years at fixed-interest rates. BGN liquidity is predominantly placed at the BNB or invested in Bulgarian sovereign bonds. EUR or USD, on the other hand, are generally invested in the Bank of Greece (only EUR), ProCredit Bank Germany or securities issued by multilaterals internationally rated at least AA-. The impact of market price changes on the bank is limited.

The bank's exposure to counterparty and issuer risk increased in 2022 compared to the end of 2021 in line with the growth of the customer deposits and the corresponding increase of liquid funds. The placements are concentrated towards central banks and ProCredit Bank Germany. The liquid assets other than physical cash of the bank were placed as follows:

Counterparty	31 Dec 2022	in %	31 Dec 2021	in %
Central banks	524,717	62%	546,974	75%
Mandatory reserves	286,996	34%	241,384	33%
Other cash equivalents	237,721	28%	305,590	42%
Banking groups	245,476	30%	122,085	17%
Foreign banks	245,476	30%	83,749	12%
Local banks	-	-	38,336	5%
Securities issued by Bulgarian Government	51,981	6%	61,455	8%
Securities issued by German public institutions	13,412	2%	-	-
Total	**835,586**	**100%**	**730,514**	**100%**

The table below presents an analysis of debt securities and banks placements by rating agency designation, based on the credit assessments of the rating agency Fitch:

As of 31 Dec 2022

Rating	Debt instruments	Loans and advances to banks	Total
AA- to AAA	13,412	10	13,422
BBB- to BBB+	51,981	245,466	297,447
Total	**65,393**	**245,476**	**310,869**

As of 31 Dec 2021

Rating	Debt instruments	Loans and advances to banks	Total
AA- to AAA	-	9,615	9,615
BBB- to BBB+	61,455	112,470	173,925
Total	**61,455**	**122,085**	**183,540**

4 Risk management (continued)

d Counterparty risk, including issuer risk (continued)

Exposure to a counterparty is impaired if one or more events with an adverse effect on the expected future cash flows have occurred. Examples of such events are a breach of contract (such as default or overdue payment), significant financial difficulties of the counterparty, or a significant deterioration of the external rating. None of positions shown was past due nor showed any signs of impairment as of 31 December 2022. They are thus assigned to Stage 1 (performing). The bank has established provisions in accordance with IFRS 9 requirements (see also notes 14-17 to the separate financial statements).

The exposure towards counterparties and issuers is managed on the basis of a limit system, as is the case for customer credit risk. ProCredit Bank concludes transactions only with counterparties that have previously been carefully analysed and for which a limit has been approved. The total limit for banks or banking groups is also set, with a distinction being made between banks and banking groups based in an OECD country and those outside of the OECD. The typical maximum maturity of the bank's term deposits is three months; longer maturities must be approved. Approval is required before any investments in securities. The bank's counterparty risk is quantified and analysed regularly as part of the internal capital adequacy calculation. When calculating the risk- and term-adjusted exposure, all exposures towards counterparties are taken into account.

e Market risk

Market risks comprise the risk of potential losses from shifts in market prices, such as exchange rates or other parameters which influence prices. Relevant market risks for ProCredit Bank are foreign currency risk and interest rate risk in the banking book. The bank manages market risks in such a way that their impact is as limited as possible from an overall risk perspective. In accordance with the bank risk strategy, foreign currency risk and interest rate risk may not be incurred for speculative purposes. Foreign currency and interest rate derivatives are used exclusively for hedging or liquidity purposes. ProCredit Bank is non-trading book institution.

Interest rate benchmark report

ProCredit Bank (Bulgaria) EAD is not directly exposed to the Interest rate benchmark reform, which is globally undertaken and leads to replacement of key international reference rates. The bank does not have credit facilities or financial instruments, which are linked to interbank offered rates (IBORs) or EONIA.

Since 2018 with the abolishment of the SOFIBOR, the only reference interest index for credit facilities with a variable interest rate is 6-month EURIBOR. Respectively, the financial instruments of the bank are also linked to EURIBOR with different tenors. As the reform of the EURIBOR was only related to enhancement of its methodology, it does not have impact on the bank's contracts.

Foreign currency risk

The bank defines foreign currency risk as the risk that the bank incurs losses due to exchange rate fluctuations. Foreign currency risk can have adverse effects on income and can lead to a decline in regulatory capital ratios.

4 Risk management (continued)

e Market risk (continued)

The framework for managing the foreign currency risk is approved by the Management of the bank 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 currency risk.

Results are impacted negatively when the volume of the 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). Limits for OCP are set at bank level. 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.

ProCredit Bank operates in an environment, where the local currency is stable because of the currency board in Bulgaria. It guarantees that in a mid-term no fluctuations of the local currency to the EUR exchange rate are expected. As almost all of the assets and liabilities are denominated either in local currency or in EUR, the exposure of the bank toward foreign currency risk is insignificant.

4 Risk management (continued)

e Market risk (continued)

The table below summarizes the bank's exposure to foreign currency exchange rate risk.

As of 31 December 2022	BGN	EUR	USD	Other	Total
Assets					
Cash and central bank balances	271,513	285,846	3,669	-	561,028
Loans and advances to banks	-	182,803	56,618	6,055	245,476
Investment securities (FVOCI)	918	52,039	19,588	-	72,545
Loans and advances to customers, net	1,440,192	1,325,473	82	-	2,765,747
Derivative financial assets	-	15,117	-	-	15,117
Other financial assets	5,397	1,801	2	-	7,200
Total assets	**1,718,020**	**1,863,079**	**79,959**	**6,055**	**3,667,113**
Liabilities					
Liabilities to banks	-	16,230	-	-	16,230
Liabilities to customers	1,781,478	1,188,655	84,740	5,927	3,060,800
Liabilities to financial institutions	-	230,716	-	-	230,716
Lease liabilities	9,651	1,254	-	-	10,905
Derivative financial liabilities	-	47	-	-	47
Other financial liabilities	2,303	1,416	8	2	3,729
Total liabilities	**1,793,432**	**1,438,318**	**84,748**	**5,929**	**3,322,427**
Net balance sheet position	**(75,412)**	**424,761**	**(4,789)**	**126**	**344,686**
Contingent liabilities and commitments (Note 31)	413,056	179,437	3,505	-	595,998
Open spot transactions	-	4,792	(4,784)	-	8

As of 31 December 2021	BGN	EUR	USD	Other	Total
Assets					
Cash and central bank balances	279,042	303,587	718	61	**583,408**
Loans and advances to banks	-	53,538	64,489	4,058	**122,085**
Investment securities (FVOCI)	918	61,513	6,130	-	**68,561**
Loans and advances to customers, net	1,155,970	1,203,490	523	-	**2,359,983**
Derivative financial assets	-	303	-	-	**303**
Other financial assets	2,979	797	2	-	**3,778**
Total assets	**1,438,909**	**1,623,228**	**71,862**	**4,119**	**3,138,118**
Liabilities					
Liabilities to banks	-	324	-	-	**324**
Liabilities to customers	1,499,790	1,064,653	72,145	3,932	**2,640,520**
Liabilities to financial institutions	-	168,044	-	-	**168,044**
Lease liabilities	10,599	347	-	-	**10,946**
Derivative financial liabilities	-	165	-	-	**165**
Other financial liabilities	2,167	1,502	13	2	**3,684**
Total liabilities	**1,512,556**	**1,235,035**	**72,158**	**3,934**	**2,823,683**
Net balance sheet position	**(73,647)**	**388,193**	**(296)**	**185**	**314,435**
Contingent liabilities and commitments (Note 31)	316,586	162,802	1,406	-	**480,794**
Open spot transactions	-	(1,173)	1,171	-	**(2)**

4 Risk management (continued)

e Market risk (continued)

Interest rate risk in the banking book

Interest rate risk is the risk of incurring losses due to changes in market interest rates and primarily arises from differences between the repricing maturities of assets and liabilities. The bank's aim in interest rate risk management is to keep these differences as small as possible in all currencies.

The framework for managing the interest rate risk is approved by the Management of the bank 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 bank.

In order to manage interest rate risk, ProCredit Bank primarily issues variable-rate loans. In this way, the repricing maturities of assets can be better 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.

The measurement, monitoring, limiting and management of interest rate risk is based on economic value impact (EVI) and P&L-oriented indicators. The risk is measured on a regular basis, at least quarterly. The assets and liabilities are distributed across time buckets according to the contractual terms, thereby aggregating individual contracts into homogeneous groups. Sight deposits are included in the gap analyses as non-interest bearing. Saving accounts are included in the gap analyses according to their expected repricing maturities, which are derived from a group-wide analysis of historical developments. In addition, regularly updated assumptions on planned business developments are used to calculate the P&L indicator. Included in the table are the bank's assets and liabilities, presented as discounted future cash flows, categorised by the earlier of contractual repricing or maturity dates. Total undiscounted cash flows consist of principal and interest amounts, which are due. The credit risk factors (provisions) are also taken into consideration. The provisioned amounts are deducted proportionally from the cash flows. The table below summarises the bank's exposure to interest rate risk.

4 Risk management (continued)

e Market risk (continued)

As of 31 December 2022	Up to 1 month	1 – 3 months	3 – 12 months	1 – 5 years	Over 5 years	Non-interest bearing	Total un-discounted cash flows	Total carrying amount
Assets								
Cash and central bank balances	245,734	-	-	-	-	315,294	561,028	561,028
Loans and advances to banks	213,240	28,455	-	-	-	3,848	245,543	245,476
Investment securities (FVOCI)	117	19,928	24,588	23,186	-	6,392	74,211	72,545
Loans and advances to customers, net	121,435	184,930	1,168,458	924,541	611,998	-	3,011,362	2,765,747
Derivative financial assets	15,117	-	-	-	-	-	15,117	15,117
Other financial assets	-	-	-	-	-	7,200	7,200	7,200
Total assets	**595,643**	**233,313**	**1,193,046**	**947,727**	**611,998**	**332,734**	**3,914,461**	**3,667,113**
Liabilities								
Liabilities to banks	-	-	-	-	-	16,230	16,230	16,230
Liabilities to customers	1,114,997	80,684	333,189	19,221	1,005	1,511,704	3,060,800	3,060,800
Liabilities to financial institutions	34,910	13,743	63,765	134,240	4,291	-	250,949	230,716
Lease liabilities	-	-	-	-	-	10,905	10,905	10,905
Derivative financial liabilities	47	-	-	-	-	-	47	47
Other financial liabilities	-	-	-	-	-	3,729	3,729	3,729
								0
Total liabilities	**1,149,954**	**94,427**	**396,954**	**153,461**	**5,296**	**1,542,568**	**3,342,660**	**3,322,427**
Interest sensitivity gap	**(554,311)**	**138,886**	**796,092**	**794,266**	**606,702**	**(1,209,834)**	**571,801**	**344,686**

As of 31 December 2021	Up to 1 month	1 – 3 months	3 – 12 months	1 – 5 years	Over 5 years	Non-interest bearing	Total un-discounted cash flows	Total carrying amount
Assets								
Cash and central bank balances	305,589	-	-	-	-	277,819	583,408	583,408
Loans and advances to banks	112,109	-	-	-	-	9,976	122,085	122,085
Investment securities (FVOCI)	-	20,314	16,196	24,940	-	9,165	70,615	68,561
Loans and advances to customers, net	108,763	133,078	942,629	841,345	522,748	-	2,548,563	2,359,983
Derivative financial assets	303	-	-	-	-	-	303	303
Other financial assets	-	-	-	-	-	3,778	3,778	3,778
Total assets	**526,764**	**153,392**	**958,825**	**866,285**	**522,748**	**300,738**	**3,328,752**	**3,138,118**
Liabilities								
Liabilities to banks	-	-	-	-	-	324	324	324
Liabilities to customers	812,614	51,496	395,035	21,271	2,448	1,357,656	2,640,520	2,640,520
Liabilities to financial institutions	10,708	16,669	38,202	90,474	13,385	-	169,438	168,044
Lease liabilities	137	274	1,230	5,518	3,787	-	10,946	10,946
Derivative financial liabilities	165	-	-	-	-	-	165	165
Other financial liabilities	-	-	-	-	-	3,685	3,685	3,684
								0
Total liabilities	**823,624**	**68,439**	**434,467**	**117,263**	**19,620**	**1,361,665**	**2,825,078**	**2,823,683**
Interest sensitivity gap	**(296,860)**	**84,953**	**524,358**	**749,022**	**503,128**	**(1,060,927)**	**503,674**	**314,435**

4 Risk management (continued)

e Market risk (continued)

Interest rate risk is quantified on the basis of economic value impact and on the basis of the 12-month P&L effect. Modelled country-specific, risk-free yield curves are used in a multi-curve approach to discount the cash flows. The bank assumes a +/– parallel shift of the yield curves. For EUR and USD the interest rate shock is ± 200 basis points, whereas for domestic currencies the magnitude of the shock is derived on the basis of a historical analysis, with a minimum interest rate shock set at ± 200 basis points. Limits are set in relation to regulatory capital for the economic value impact and in relation to the forecast net interest income for the P&L effect. Both indicators remained within their limits.

31 Dec 2022		31 Dec 2021	
Economic value impact	12 month P&L effect	Economic value impact	12 month P&L effect
(13,530)	(35,485)	(7,321)	(1,662)

The bank 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, even in stress situations.

The framework for managing ProCredit Bank’s liquidity and funding risk is approved by the Management of the bank 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 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.

The bank assesses short-term liquidity risk on the basis of a liquidity gap analysis, among other instruments, and the bank monitors this risk using numerous indicators. These include both a 30-day liquidity indicator (Sufficient Liquidity Indicator, SLI) and a survival period, as well as the minimum liquidity ratio stipulated by CRR (Liquidity Coverage Ratio, LCR). The SLI measures whether institutions have sufficient liquidity in relation to the expected inflows and outflows of funds in the next 30 days. The survival period is the timeframe during which the bank is able to fulfil all payment obligations, despite reduced liquidity inflows and elevated outflows. The calculation applies outflows derived from historical analyses of deposit movements in the bank. The defined minimum survival period limits is at least 90 days on total currency level. LCR indicates whether the bank has sufficient liquidity to cover the net outflows expected in the next 30 days, even in the event of a specified severe economic shock scenario. Early warning indicators are also defined and monitored.

Market-related, institution-specific (idiosyncratic), combined and longer-term stress tests are conducted monthly and ad hoc to make sure that the bank keeps sufficient liquid funds to meet its obligations, even in difficult times. As liquidity reserve, ProCredit Bank Bulgaria has a stand-by agreement with ProCredit Holding in case of need of urgent funding. Moreover, the bank has a contingency plan. If unexpected circumstances arise and an individual bank from ProCredit Group proves not to have sufficient liquid funds, the ProCredit group has also developed a liquidity contingency plan and ProCredit Holding would step in as a “lender of last resort”. ProCredit Holding keeps an adequate liquidity reserve available for this purpose. The amount of the liquidity reserve is determined on the basis of group stress tests and monitored on a regular basis.

4 Risk management (continued)

f Liquidity and funding risk (continued)

The liquidity of the bank is managed on a daily basis by the respective responsible units, based on the ALCO-approved cash flow projections, and is monitored by risk management and ALCO.

The liquidity situation of ProCredit Bank remained adequate and stable over the course of the year. This was mainly due to a strong increase in deposits as well as new funding agreements with international financial institutions. The bank had sufficient liquidity available at all times in 2022 to meet all financial obligations in a timely manner.

4 Risk management (continued)

f Liquidity and funding risk (continued)

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

Maturity analysis for financial assets and financial liabilities

As of 31 December 2022	Up to 1 month	1 – 3 months	3 – 12 months	1 – 5 years	Over 5 years	Gross nominal amount	Total carrying amount
Assets							
Cash and central bank balances	561,182					561,182	561,028
Loans and advances to banks	216,143	29,337	-	-	-	245,480	245,476
Investment securities (FVOCI)	109	19,495	4,555	42,554	7,152	73,865	72,545
Loans and advances to customers, net	80,989	176,795	961,942	1,146,506	694,373	3,060,605	2,765,747
Derivative financial assets	-	-	-	-	15,117	15,117	15,117
Other financial assets	7,200	-	-	-	-	7,200	7,200
Total financial assets	**865,623**	**225,627**	**966,497**	**1,189,060**	**716,642**	**3,963,449**	**3,667,113**
Liabilities							
Liabilities to banks	16,230	-	-	-	-	16,230	16,230
Liabilities to customers	2,612,628	80,517	348,996	19,833	-	3,061,974	3,060,800
Liabilities to financial institutions	2,732	14,293	26,543	199,626	7,461	250,655	230,716
Lease liabilities	135	270	1,281	5,902	3,317	10,905	10,905
Derivative financial liabilities	-	-	-	-	47	47	47
Other financial liabilities	3,729	-	-	-	-	3,729	3,729
Total financial liabilities	**2,635,454**	**95,080**	**376,820**	**225,361**	**10,825**	**3,343,540**	**3,322,427**
Liquidity gap	**(1,769,831)**	**130,547**	**589,677**	**963,699**	**705,817**	**619,909**	**344,686**
Contingent liabilities and commitments	**595,998**	**-**	**-**	**-**	**-**	**595,998**	**595,998**

As of 31 December 2021	Up to 1 month	1 – 3 months	3 – 12 months	1 – 5 years	Over 5 years	Gross nominal amount	Total carrying amount
Assets							
Cash and central bank balances	583,537					583,537	583,408
Loans and advances to banks	122,086	-	-	-	-	122,086	122,085
Investment securities (FVOCI)	-	20,355	575	42,601	7,106	70,637	68,561
Loans and advances to customers, net	84,478	131,699	744,166	1,042,153	598,242	2,600,738	2,359,983
Derivative financial assets	-	-	-	-	303	303	303
Other financial assets	3,778	-	-	-	-	3,778	3,778
Total financial assets	**793,879**	**152,054**	**744,741**	**1,084,754**	**605,651**	**3,381,079**	**3,138,118**
Liabilities							
Liabilities to banks	324	-	-	-	-	324	324
Liabilities to customers	2,160,596	51,694	405,916	22,866	-	2,641,072	2,640,520
Liabilities to financial institutions	1,203	14,277	20,414	114,407	19,130	169,431	168,044
Lease liabilities	137	274	1,230	5,518	3,787	10,946	10,946
Derivative financial liabilities	-	-	-	-	165	165	165
Other financial liabilities	3,684	-	-	-	-	3,684	3,684
Total financial liabilities	**2,165,944**	**66,245**	**427,560**	**142,791**	**23,082**	**2,825,622**	**2,823,683**
Liquidity gap	**(1,372,065)**	**85,809**	**317,181**	**941,963**	**582,569**	**555,457**	**314,435**
Contingent liabilities and commitments	**480,794**	**-**	**-**	**-**	**-**	**480,794**	**480,794**

Liabilities to customers with maturity up to 1 month include all sight and saving deposits amounting to BGN 2,513,336 thousand (2021: BGN 2,086,981 thousand). The bank'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 93% of term deposits at maturity date were not withdrawn but automatically renegotiated under similar terms and conditions.

4 Risk management (continued)

f Liquidity and funding risk (continued)

Funding risk is the danger that additional funding cannot be obtained, or can only be obtained at higher costs. It therefore covers parts of the non-systemic effect of interest rate changes. This risk is mitigated by the fact that the bank finances its lending operations primarily through customer deposits; nonetheless, its deposit-taking operations focus on the target group of business clients and private clients/savers, with whom the bank establishes strong relationships. These are supplemented by long-term credit lines from international financial institutions (IFIs). The funding of the bank has proven to be resilient even in times of stress. As of end-December 2022, the largest funding source was deposits with BGN 3,061 million and liabilities to international financial institutions are the second-largest source of funding, accounting for BGN 231 million.

The bank manages, measures and limits funding risk through business planning, maturity gap analysis and several indicators. The funding needs of the bank, identified in the business planning process, are monitored and regularly reviewed. ALCO monitors the progress of all individually significant transactions with external funding providers, especially international financial institutions. ProCredit Holding and the ProCredit Bank in Germany also offer bridge financing in the event that a funding project is delayed. Early warning indicator for limiting funding risk is the deposit concentration indicator which has a set reporting trigger of 5% (it stood at 4.5% as of end 2022). Two more indicators additionally restrict the level of funding from the interbank market to a low level.

g Operational risk management

In line with CRR, the bank defines operational risk as the risk of loss resulting from inadequate or failed internal processes, people or systems (e.g. failure of data-processing systems, embezzlement, human error, faulty processes, structural weaknesses, insufficient monitoring) or from external events (e.g. criminal activities, natural disasters). This definition includes in particular fraud risk, IT risk, legal risk, reputational risk and outsourcing risk. Operational risk management aims to identify, analyse and assess all material risks at an early stage and to avoid their recurrence by implementing preventive measures, which are mitigating the identified risks.

The bank has an assigned operational risk management role to ensure the effective implementation of the operational and fraud risk management framework within the institution. In addition, the Operational Risk Assessment Committee (“ORAC”) serves as 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. Operational risk is accounted for and monitored within the scope of the group’s capital adequacy calculation in the economic approach.

One of the key components of operational risk management is the detailed recording of risk events arising from operational risks. In this context, a Risk Event Database (RED) was developed to ensure that all risk events above certain monetary threshold identified in ProCredit group and in the bank with realised or potential losses from operational risks are recorded, analysed and communicated effectively. Through this uniform, pre-defined structure for the documentation of risk events, it is ensured that adequate attention is paid to the implementation of necessary corrective and/or preventive measures for reducing or avoiding operational and fraud risk.

4 Risk management (continued)

g Operational risk management (continued)

In addition, operational risk and fraud risk assessments are carried out annually in the bank. This broad risk assessment aims to identify the potential risks and the implemented risk mitigation controls within all processes in the bank, if a higher level of risk is identified in certain area action plans are developed and their implementation is closely monitored. In contrast to the ex-post analysis of risk events as recorded in the RED, these risk assessments are systematically performed in order to identify and evaluate key risks and to assess the adequacy of the control processes. Risk mitigation measures are defined for the areas identified as high risk. These two control components complement each other and provide an overall picture of the operational risk profile for the bank.

In addition, early warning indicators (Key Risk Indicators for fraud) have been defined for the bank, in order to identify areas of banking business with increased fraud risk. The early warning indicators are analysed regularly and, where needed, preventive measures are agreed upon.

To complete the management of operational risk, all new products, processes, instruments and/or activities need to pass through a New Risk Approval (NRA) process before being implemented or used for the first time. An NRA is required to ensure that all new risks are assessed and all necessary preparations and tests are completed prior to implementation. In relation to the outsourced activities, a risk assessment is carried out of the provider and to the services, which are outsourced in order the impact of potential failure to be measured and the risk to be recognized and if necessary mitigated with certain action plans and mitigation measures.

In order to limit IT risks, the bank has defined standards for IT infrastructure, business continuity and information security. Regular controls of information security and business continuity are part of existing processes and procedures. The bank carries out a classification of the information assets and conduct an annual risk assessment on the critical information assets. The business continuity framework implemented in the bank ensures that these risks are understood by all members of the staff. Critical processes are identified and resources are allocated to restore operations, in line with the prioritisation of processes. The bank has implemented broad Information Security Awareness program in order to increase the employees` preparedness, readiness and informed decision making in topics like phishing, social engineering, hacking, blackmailing, viruses, other attack technics and vectors along with applied countermeasures. The main goal of the Information Security strategy is aligned with the business strategy of the bank and strongly supported by the Management.

A key element of the risk assessment is the evaluation of outsourcing. The bank is following the latest EBA (EBA/GL/2019/02) and MaRisk regulations regarding outsourcing of services. The bank maintains a register of all outsourced activities and conducts evaluation of risk on each outsourced process. On an annual basis the bank conducts monitoring of all outsourcing arrangements, which is fully in line with the EBA Guidelines on outsourcing arrangements. KPI Assessment is performed, based on the results of the annual monitoring, which further complements to the risk overview related to outsourcing.

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

Responsible behaviour is an integral part of the bank's values-oriented business model. This is reflected in the Code of Conduct for the bank's employees as well as in the contents of the introductory courses for new staff and in the curricula of the ProCredit academies. The prevention of money laundering, terrorist financing and fraud is a key component of the bank's self-perception. This is illustrated by the criteria used to select customers and by the few cases of internal fraud within the ProCredit group as a whole.

4 Risk management (continued)

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

The bank is in compliance with all regulatory requirements concerning the prevention of money laundering and terrorist financing. Moreover, the bank has implemented the ProCredit group-wide guidelines on the prevention of money laundering and terrorist financing, which in many respects are stricter than the legal requirements prevailing in the individual countries of operation of the ProCredit group. As the ProCredit group is supervised by the German financial supervisory authorities, the bank implements the requirements stipulated by the German Money Laundering Act, as well as the requirements applicable at European level.

The bank's ethical responsibility is documented in the form of its Code of Conduct and Exclusion List, which contain the core rules and regulations that all employees of ProCredit banks are obliged to observe. The group-wide guidelines on the prevention of money laundering, terrorist financing and fraudulent activities, together with their subordinate directives, specify how these basic rules are to be implemented in practice.

Besides identifying all contracting parties and clarifying the purpose of the business relationship, the collection of client data 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 the bank's business relationship with a client.

ProCredit Bank uses specialized 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 Anti-Money Laundering (AML) Officer at ProCredit Holding, who in turn is the main contact for supervisory and law enforcement authorities in Germany and other countries.

i Capital management

Capital management in the bank is guided by the principle that the institution shall not at any time incur greater risks than it is able to bear. The capital management framework of the bank has the following objectives:

- Compliance with regulatory capital requirements (normative perspective)
- Ensuring internal capital adequacy (economic perspective)
- Compliance with the internally defined capital requirements and creation of a sufficient capital buffer to ensure that the bank is able to act
- Support for the bank in implementing the plans for sustainable growth

The capital adequacy is monitored using different indicators for which early warning indicators and limits have been established. The indicators include capital adequacy calculation in accordance with CRR requirements, a Tier 1 leverage ratio in accordance with CRR and a calculation of capitalisation in the economic perspective (i.e. internal capital adequacy assessment process – ICAAP). ProCredit Bank is subject to the requirements imposed by the respective national supervisory authorities. The capital management of ProCredit Bank is governed by specific policies and monitored on a monthly basis by the Management.

Ensuring that the bank maintains sufficient capitalisation in the economic perspective at all times is a key element of the bank's risk management and capital management processes. In the context of the economic perspective, the capital needs arising from the bank's specific risk profile are compared with the available capital resources to assure that the institution's capitalisation is sufficient at all times. Capitalisation in the economic perspective was adequate at all times during the course of 2022.

4 Risk management (continued)

i Capital management (continued)

The methods the bank uses to calculate the amount of economic capital required to cover the different risks the bank is exposed are based on statistical models, provided that appropriate models are available. The guiding principle for the bank's internal capital adequacy assessment is that the bank is able to withstand strong shock scenarios. Compared to the previous year, there were no significant adjustments to the risk models. As the datasets include various periods of stress, there was no need to adjust risk modelling to adequately reflect the impact of the COVID-19 pandemic. Furthermore, the impact of the pandemic in 2020/2021 is now also part of the data history, which adds another stress phase to the conservative risk modelling.

When calculating the economic capital required to cover risk exposures the bank applies a one-year risk assessment horizon. The included material risks and the limits set for each risk reflect the specific risk profile of the bank and are based on the annually conducted risk inventory. The following risks are included in the internal capital adequacy calculation:

Material risk	**Quantification/treatment**
Credit risk, comprising: • customer credit risk • counterparty risk	Portfolio model based on a Monte Carlo simulation (VaR)
Foreign currency risk	Monte Carlo simulation (VaR)
Interest rate risk	Historical simulation (VaR)
Operational risk	Quantitative model based on a Monte Carlo simulation

Capitalisation in the normative perspective

The normative perspective analyses whether regulatory and supervisory capital requirements have been met on a continuous basis. This was the case at all times during the reporting period.

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 bank. 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. The buffers and the respective requirement towards the bank are as follows:

- Capital conservation buffer in the form of Common Equity Tier 1 equal to 2.5% of total risk exposure amount;
- Systemic risk buffer in the form of Common Equity Tier 1 capital equal to 3.0% of the total risk exposures in Bulgaria;
- Countercyclical capital buffer in the form of Common Equity Tier 1 capital equal to 1.0% of the credit risk exposures in Bulgaria.

After adding the capital buffers to the capital requirements, the minimum requirement amounts to 13.8% as of 31.12.2022 according to the regulatory framework applicable for ProCredit Bank. The bank's internal capital management policy sets a stricter limit for the total capital adequacy ratio with a reporting trigger of 15.3% and a limit of 14.8% (as of 31.12.2022).

4 Risk management (continued)

i Capital management (continued)

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. Credit risk mitigation techniques are applied in the calculation of capital requirements for credit risk. Risk amounts arising from credit risk are reduced in part through the recognition of guarantees from the European Investment Fund (EIF), cash collaterals and mortgages on immovable property.
- 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 19.9 million, the average annual loss according to data recorded in the Risk Event Database in the last three years amounted to BGN 151 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 31.12.2022 the value was 0.05%, 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 bank's regulatory capital ratios are presented below:

Regulatory capital	**2022**	**2021**
Common Equity Tier 1 capital	269,701	242,582
Total regulatory capital	**269,701**	**242,582**
Risk Weighted Assets		
Risk Weighted Assets for Credit Risk	1,585,561	1,314,194
Risk Weighted Assets for Operational Risk	144,696	132,346
Total Risk Weighted Assets	**1,730,257**	**1,446,540**
Capital ratios		
Common Equity Tier 1 capital	15.6%	16.8%
Tier 1 capital	15.6%	16.8%
Total capital	15.6%	16.8%

The Common Equity Tier 1 capital of the bank is composed of subscribed capital, reserves and retained earnings. Deductions are made for intangible assets, additional valuation adjustments for balance sheet items recognised at market value, investment in non-financial subsidiary undertakings, NPL and other deductions related to credit risk corrections. ProCredit Bank increased its legal reserves BGN 2,934 thousand respectively in 2022.

The total volume of risk-weighted assets in the bank increased by BGN 283.7 million in 2022. This growth was driven from the increase of the customer loan portfolio and high liquid placements in central banks and other banks.

4 Risk management (continued)

j Internal control system and risk management system in the financial reporting process

The internal control system and risk management system in ProCredit Bank's financial reporting process comprises the principles, procedures and measures for the effective, cost-efficient and rule-compliant application of financial reporting requirements. The main risks in due and proper financial reporting are the improper representation of financial position and financial performance or delayed publication. The internal control system in the financial reporting process is subject to the general principles of the bank's risk management approach and is thus an integral component of the risk management system.

Primary responsibility for the internal control system and risk management system in the financial reporting process, and thus for its effectiveness and monitoring, lies with the Management. The Management establishes the general principles and defines areas of responsibility. Finance function implements the requirements of the Management and defines the specific parameters within the framework provided. Operational Risk Management identifies and assesses risks on a regular basis. Risk assessment comprises an evaluation of operational and fraud risks as well as a review of the effectiveness of the respective controls. If necessary, appropriate measures are defined and implemented in order to limit the risks identified.

The financial reporting process aims to standardise, to the greatest extent possible, the application of the main international financial reporting standards and related processes. The ProCredit group Accounting & Taxes function establishes the accounting manual, which applies throughout the group, and defines the material processes in the respective policies, taking account for the principle of dual control. The processes for report preparation are largely automated and the functionalities of the key IT applications have been defined on a centralised basis. IT permissions are defined and regularly monitored in accordance with the respective policies.

The financial reporting process is supported by a multi-step control system. This ensures compliance with legal requirements and the implementation of internal policies. The units in the bank prepare information relevant for financial reporting with the support of IT applications which are uniform throughout the bank. The information packages from units in the bank are reviewed, taking account for the dual control principle, and then subject to standardised quality checks.

In addition, Internal Audit supports the Management and the Supervisory Board in their control functions through independent and objective risk-oriented audits. Regular audits are performed on the financial reporting processes to determine whether they are effective, orderly and cost efficient.

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 bank'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 2022				**Fair value hierarchy**		
Financial assets	**Category***	**Carrying amount**	**Fair value**	**Level 1**	**Level 2**	**Level 3**
Cash	AC	36,464	36,464	36,464	-	-
Central bank balances	AC	524,564	524,718	-	524,718	-
Loans and advances to banks	AC	245,476	245,480	-	245,480	-
Investment securities (Bonds)	FVOCI	65,393	65,393	65,393	-	-
Investment securities (Shares)	FVOCI	7,152	7,152	6,176	-	976
Loans and advances to customers, net	AC	2,765,747	2,826,597	-	-	2,826,597
Derivative financial assets	FV	15,117	15,117		15,117	
Other financial assets	AC	7,200	7,200	-	7,200	-
Total		**3,667,113**	**3,728,121**	**108,033**	**792,515**	**2,827,573**

Financial liabilities	**Category***	**Carrying amount**	**Fair value**	**Level 1**	**Level 2**	**Level 3**
Liabilities to banks	AC	16,230	16,230	-	16,230	-
Liabilities to customers	AC	3,060,800	3,059,840	-	2,572,901	486,939
Liabilities to financial institutions	AC	230,716	215,265	-	-	215,265
Lease liabilities	AC	10,946	10,946	-	10,946	-
Derivative financial liabilities	FV	47	47	-	47	-
Other financial liabilities	AC	3,729	3,729	-	3,729	-
Total		**3,322,468**	**3,306,057**	**-**	**2,603,853**	**702,204**

As of 31 December 2021				**Fair value hierarchy**		
Financial assets	**Category***	**Carrying amount**	**Fair value**	**Level 1**	**Level 2**	**Level 3**
Cash	AC	36,563	36,563	36,563	-	-
Central bank balances	AC	546,845	546,974	-	546,974	-
Loans and advances to banks	AC	122,085	122,085	-	122,085	-
Investment securities (Bonds)	FVOCI	61,455	61,455	61,455	-	-
Investment securities (Shares)	FVOCI	7,106	7,106	6,130	-	976
Loans and advances to customers, net	AC	2,359,983	2,441,162	-	-	2,441,162
Derivative financial assets	FV	303	303		303	
Other financial assets	AC	3,778	3,778	-	3,778	-
Total		**3,138,118**	**3,219,426**	**104,148**	**673,140**	**2,442,138**

Financial liabilities	**Category***	**Carrying amount**	**Fair value**	**Level 1**	**Level 2**	**Level 3**
Liabilities to banks	AC	324	324	-	324	-
Liabilities to customers	AC	2,640,520	2,640,645	-	2,133,958	506,687
Liabilities to financial institutions	AC	168,044	162,657	-	-	162,657
Lease liabilities	AC	10,946	10,946	-	10,946	-
Derivative financial liabilities	FV	165	165	-	165	-
Other financial liabilities	AC	3,684	3,684	-	3,684	-
Total		**2,823,683**	**2,818,421**	**-**	**2,149,077**	**669,344**

* categories: FV - At Fair value; AC - Amortised cost; FVOCI - fair value through other comprehensive income

5 Fair values of financial assets and liabilities (continued)

(i) Cash
The fair value of the 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) Investment securities
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 the investment securities includes equity securities where observable market prices are not available (SWIFT and Borika-Bankservice shares).

(iv) Loans and advances to customers
Loans and advances are net of impairment allowance. 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 amortised cost and related impairment include only expected 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.

6 Net interest income	**2022**	**2021**
Interest income calculated using the effective interest rate method		
Loans and advances to customers	81,256	72,743
Loans and advances to banks	2,209	-
Investment securities	64	-
Other interest income	905	-
Total interest income calculated using the effective interest rate method	**84,434**	**72,743**
Interest and similar expenses		
Liabilities to customers	865	785
Liabilities to banks and financial institutions	4,058	1,230
Loans and advances to banks	-	1,666
Lease liabilities	367	372
Investment securities	-	154
Other interest expenses	926	92
Total interest and similar expenses	**6,216**	**4,299**
Net interest income	**78,218**	**68,444**

Included in “Interest income from loans and advances to customers” for 2022 is BGN 1,546 thousand of accrued interest on impaired loans (2021: BGN 1,658 thousand).

7 Loss allowance	**2022**	**2021**
Increase of impairment charge	30,445	20,729
Release of impairment charge	(14,521)	(13,902)
Recovery of written-off loans	(2,375)	(906)
Direct write-offs	508	408
Modification	(812)	(2)
Total loss allowance	**13,245**	**6,327**

8 Net fee and commission income	**2022**	**2021**
Fee and commission income		
Opening and account maintenance fees	9,888	9,781
Loan related fees	6,449	6,142
Debit/credit cards	5,662	4,013
Payment services	4,616	4,406
Cash operations on machines	2,608	1,919
Insurance fees	979	907
Loan management	130	213
Others	650	613
Total fee and commission income from contracts with customers	**30,982**	**27,994**
Letters of credit and guarantees	951	775
Total fee and commission income	**31,933**	**28,769**

8 Net fee and commission income (continued)

	2022	2021
Fee and commission expense		
Guarantees for EIF programs	1,273	1,277
Debit/credit cards	1,885	1,182
Correspondent accounts	579	673
Others	310	52
Total fee and commission expense	**4,047**	**3,184**
Net fee and commission income	**27,886**	**25,585**

Loan related fees include: fees for changes in loan conditions; prepayment fees; commitment fees; loan application fees; collateral appraisal fees.

9 Result from foreign exchange transactions

	2022	2021
Currency transactions	9,838	8,826
Net gains from currency revaluation	472	13
Total result from foreign exchange transactions	**10,310**	**8,839**

10 Other income/ Other expenses

	2022	2021
a) Other income		
Income from non-financial services	975	869
Reversal of impairment of repossessed property	870	731
Income from derivative financial instruments	731	81
Fee for keeping of funds of closed inactive accounts	98	-
Dividends from investment securities	90	75
Income from sale of repossessed property	35	-
Income from sale of own property	27	78
Income from management services to subsidiaries	17	20
Other operating income	944	292
Total other income	**3,787**	**2,146**
b) Other expenses		
BNB fees	684	941
Loss from sale of repossessed property	-	80
Other expenses related to repossessed property	76	71
Fee for keeping of funds of closed inactive accounts	-	14
Total other expenses	**760**	**1,106**

“Dividends from investment securities” includes the dividend received by entities in which the bank has non-controlling interest. “BNB fees” includes banking supervision fee, payment supervision fee and restructuring fee, paid to Bulgarian National Bank.

11 Personnel expenses	2022	2021
Salary expenses	21,032	20,415
Pension costs	1,545	1,302
Other social security costs	1,644	1,442
Other employee costs	118	97
Total personnel expenses	**24,339**	**23,256**

12 Administrative expenses	2022	2021
Depreciation fixed and intangible assets (Note 19)	6,502	6,100
Non-income tax	6,555	5,326
Consultancy, legal and audit services	4,371	3,751
Communication and transport costs	4,293	3,569
Payments to Deposit Insurance Fund and Bank Restructuring Fund	3,341	2,708
Other professional services	2,804	2,402
Training	2,385	1,532
Marketing, advertising and representation	1,992	1,166
Maintenance and utilities	1,414	1,088
IT expenses	1,254	1,113
Security services	946	833
Operating lease rentals	34	9
Other administrative expenses	1,616	2,270
Total administrative expenses	**37,507**	**31,867**

The amounts accrued in 2022 for the services provided by the registered auditors for statutory joint independent financial audit are as follows: for KPMG Audit OOD: BGN 100 thousand excluding VAT, for Baker Tilly Klitou and Partners EOOD: BGN 36.2 thousand excluding VAT. In 2022 the bank was charged with amounts for other non-statutory audit services provided by KPMG Audit OOD at a total amount of BGN 32.5 thousand excluding VAT and by Baker Tilly Klitou and Partners EOOD: BGN 3.0 thousand excluding VAT.

Other non-statutory audit services performed by KPMG Audit OOD are as follows:

- Audit of the special purpose financial information of ProCredit Bank (Bulgaria) EAD prepared as of and for the year ended 31 December 2022 in accordance with the accounting instructions of ProCredit Holding AG & Co. KGaA to the components subject to consolidation;
- Review of the special purpose financial information of ProCredit Bank (Bulgaria) EAD prepared as of and for the period ended 30 June 2022 in accordance with the accounting instructions of ProCredit Holding AG & Co. KGaA to the components subject to consolidation;
- Agreed-upon procedures in relation to the bank's internal control environment in accordance with the requirements of article 76, par. 7, p. 1 of the Law of the credit institutions and article 5 of Ordinance 14 of the Bulgarian National Bank for 2022.

Other non-statutory audit services performed by Baker Tilly Klitou and Partners EOOD are as follows:

- Agreed-upon procedures in relation to the bank's internal control environment in accordance with the requirements of article 76, par. 7, p. 1 of the Law of the credit institutions and article 5 of Ordinance 14 of the Bulgarian National Bank for 2022.

For 2021 the accrued amount for the provided audit and non-audit services by the external auditors were BGN 181.7 thousand excluding VAT.

13 Income tax expense

	2022	2021
Current income tax	4,805	3,614
Deferred income tax (Note 20)	105	107
Total income tax expenses	**4,910**	**3,721**

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

	2022	2021
Profit before income tax	**44,350**	**42,458**
out of which in Greece	10,046	5,618
Theoretical tax in Greece at a tax rate of 22%	1,408	-
Theoretical tax at a tax rate of 10 % (2021: 10%)	3,430	3,684
Tax effect from non-taxable income	(180)	(183)
Tax effect of expenses not deductible for tax purposes	252	220
Total income tax expense	**4,910**	**3,721**

The effective tax rate for 2022 is: 11.1% (2021: 8.8%).

14 Cash and central bank balances

	2022	2021
Cash in hand	36,464	36,563
Central bank balances (excl. mandatory reserve)	238,263	305,590
Loss allowances for cash and central bank balances	(154)	(129)
Mandatory reserve deposits	286,455	241,384
Total cash and central bank balances	**561,028**	**583,408**
Loans and advances to banks with a maturity up to 3 months	235,648	122,068
Minimum reserve with central bank, which does not qualify as cash for the statement of cash flows	(286,455)	(241,384)
Cash and cash equivalents for the statement of cash flows	**510,221**	**464,092**

The following table discloses the central bank balances by three stages for the purpose of expected credit losses measurement as of 31 December 2022.

Central bank balances

	Stage 1	Stage 2	Stage 3	POCI	Total
Gross outstanding amount as at 1 Jan 2021	**562,527**	**-**	**-**	**-**	**562,527**
Derecognition	-	-	-	-	**-**
Increase/(Decrease) in placements	(15,553)	-	-	-	**(15,553)**
Gross outstanding amount as at 31 Dec 2021	**546,974**	**-**	**-**	**-**	**546,974**
Derecognition	-	-	-	-	**-**
Increase/(Decrease) in placements	(22,256)	-	-	-	**(22,256)**
As at 31 Dec 2022	**524,718**	**-**	**-**	**-**	**524,718**

14 Cash and central bank balances (continued)

Loss allowances for cash and central bank balances

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 1 Jan 2021	**(123)**	**-**	**-**	**-**	**(123)**
Release due to derecognition	-	-	-	-	**-**
(Increase)/Decrease in credit risk	(6)	-	-	-	**(6)**
Balance at 31 Dec 2021	**(129)**	**-**	**-**	**-**	**(129)**
Release due to derecognition	-	-	-	-	**-**
(Increase)/Decrease in credit risk	(25)	-	-	-	**(25)**
As at 31 Dec 2022	**(154)**	**-**	**-**	**-**	**(154)**

15 Loans and advances to banks

	2022	2021
Current accounts	206,310	83,749
Loans up to three months	29,375	38,336
Loans above three months	9,795	-
Loss allowances for loans and advances to banks	(4)	-
Total loans and advances to banks	**245,476**	**122,085**

The following table discloses the loans and advances to banks balances by three stages for the purpose of expected credit losses measurement as of 31 December 2022.

Loans and advances to banks

	Stage 1	Stage 2	Stage 3	POCI	Total
Gross outstanding amount as at 1 Jan 2021	**122,969**	**-**	**-**	**-**	**122,969**
New financial assets originated	38,336	-	-	-	**38,336**
Derecognition	(14,345)	-	-	-	**(14,345)**
Increase/(Decrease) in placements	(24,875)	-	-	-	**(24,875)**
Gross outstanding amount as at 31 Dec 2021	**122,085**	**-**	**-**	**-**	**122,085**
New financial assets originated	39,170	-	-	-	**39,170**
Derecognition	(38,336)	-	-	-	**(38,336)**
Increase/(Decrease) in placements	122,561	-	-	-	**122,561**
As at 31 Dec 2022	**245,480**	**-**	**-**	**-**	**245,480**

Loss allowances for loans and advances to banks

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 1 Jan 2021	**(3)**	**-**	**-**	**-**	**(3)**
New financial assets originated	-	-	-	-	**-**
(Increase)/Decrease in credit risk	3	-	-	-	**3**
Balance at 31 Dec 2021	**-**	**-**	**-**	**-**	**-**
New financial assets originated	-	-	-	-	**-**
(Increase)/Decrease in credit risk	(4)	-	-	-	**(4)**
As at 31 Dec 2022	**(4)**	**-**	**-**	**-**	**(4)**

16 Investment securities (FVOCI)

	As of 31 December 2022		
	Listed	**Unlisted**	**Total**
Bulgarian Government debt securities	51,981	-	51,981
German public institutions debt securities	13,412	-	13,412
Shares	6,176	976	7,152
Total investment securities	**71,569**	**976**	**72,545**

16 Investment securities (FVOCI) (continued)

	As of 31 December 2021		
	Listed	Unlisted	Total
Bulgarian Government debt securities	61,455	-	61,455
Shares	6,130	976	7,106
Total investment securities	**67,585**	**976**	**68,561**

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

The following table discloses the debt securities by three stages for the purpose of expected credit losses measurement as of 31 December 2022.

Investment securities

	Stage 1	Stage 2	Stage 3	POCI	Total
Gross outstanding amount as at 1 Jan 2021	**22,540**	**-**	**-**	**-**	**22,540**
New financial assets originated	40,900	-	-	-	**40,900**
Derecognition	(1,985)	-	-	-	**(1,985)**
Gross outstanding amount as at 31 Dec 2021	**61,455**	**-**	**-**	**-**	**61,455**
New financial assets originated	24,372	-	-	-	**24,372**
Derecognition	(19,898)	-	-	-	**(19,898)**
Increase/(Decrease) in placements	(536)	-	-	-	**(536)**
As at 31 Dec 2022	**65,393**	**-**	**-**	**-**	**65,393**

Loss allowances for investment securities

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 1 Jan 2021	**(11)**	**-**	**-**	**-**	**(11)**
New financial assets originated	(16)	-	-	-	**(16)**
(Increase)/Decrease in credit risk	3	-	-	-	**3**
Balance at 31 Dec 2021	**(24)**	**-**	**-**	**-**	**(24)**
New financial assets originated	(18)	-	-	-	**(18)**
Release due to derecognition	14	-	-	-	**14**
(Increase)/Decrease in credit risk	8	-	-	-	**8**
As at 31 Dec 2022	**(20)**	**-**	**-**	**-**	**(20)**

The movement of the shares are presented in the table below:

	2022	2021
Opening balance	**7,106**	**6,681**
Disposals	-	(69)
Gains from changes in FV	(301)	20
Foreign currency revaluation	347	474
Closing balance	**7,152**	**7,106**

17 Investments in subsidiaries

The bank owns the total share capital of ProCredit Properties EAD, which co-owns (together with the bank) the head office building of the group. The registered capital of the company is divided into 10 shares with a nominal value of BGN 5,000 each. All shares confer equal voting power and are fully paid. The total investment of the bank in the company is BGN 419 thousand (2021: BGN 419 thousand).

17 Investments in subsidiaries (continued)

The bank owns the total share capital of ProCredit Education EAD. The registered capital of the company is divided into 8,000,000 shares with a nominal value of BGN 1 each. All shares confer equal voting power and are fully paid. The total investment of the bank in the company is BGN 8,163 thousand (2021: BGN 8,163 thousand).

The bank owns the total share capital of Private High School “Denis Diderot” EAD. The company was founded in 2021. The registered capital of the company is divided into 50,000 shares with a nominal value of BGN 1 each. All shares confer equal voting power and are fully paid. The total investment of the bank in the company is BGN 50 thousand (2021: BGN 50 thousand).

18 Loans and advances to customers, net

	2022	2021
Total gross loans and advances	2,809,922	2,399,177
Less provision for impairment	(44,175)	(39,194)
Total loans and advances to customers, net	**2,765,747**	**2,359,983**

The following table discloses the changes in the gross carrying amount and credit loss allowance for loans and advances to customers carried at amortised cost between the beginning and the end of the reporting period.

Loans and advances to customers

	Stage 1	Stage 2	Stage 3	POCI	Total
Gross outstanding amount as at 1 January 2021	**2,061,269**	**43,995**	**51,889**	**815**	**2,157,968**
New financial assets originated	872,169	-	-	-	**872,169**
Modification of contractual cash flows of financial assets	48	(57)	8	-	**(1)**
Derecognition	(274,142)	(18,373)	(7,764)	(114)	**(300,393)**
Write-offs	-	-	(7,805)	-	**(7,805)**
Changes in interest accrual	36	(13)	1,126	-	**1,149**
Changes in the principal and disbursement fee amount	(307,957)	(11,512)	(4,491)	50	**(323,910)**
Transfer from Stage 1 to Stage 2	(83,424)	83,424	-	-	**-**
Transfer from Stage 1 to Stage 3	(1,664)	-	1,664	-	**-**
Transfer from Stage 2 to Stage 1	45,454	(45,454)	-	-	**-**
Transfer from Stage 2 to Stage 3	-	(5,565)	5,565	-	**-**
Transfer from Stage 3 to Stage 2	-	462	(462)	-	**-**
Transfer from Stage 3 to Stage 1	1,016	-	(1,016)	-	**-**
Gross outstanding amount as at 31 Dec 2021	**2,312,805**	**46,907**	**38,714**	**751**	**2,399,177**
New financial assets originated	1,022,393	-	-	-	**1,022,393**
Modification of contractual cash flows of financial assets	(678)	(133)	-	-	**(811)**
Derecognition	(406,719)	(12,865)	(4,585)	-	**(424,169)**
Write-offs	-	-	(11,333)	-	**(11,333)**
Changes in interest accrual	184	55	627	1	**867**
Changes in the principal and disbursement fee amount	(157,858)	(13,516)	(4,753)	(75)	**(176,202)**
Transfer from Stage 1 to Stage 2	(154,310)	154,310	-	-	**-**
Transfer from Stage 1 to Stage 3	(1,508)	-	1,508	-	**-**
Transfer from Stage 2 to Stage 1	60,699	(60,699)	-	-	**-**
Transfer from Stage 2 to Stage 3	-	(10,500)	10,500	-	**-**
Transfer from Stage 3 to Stage 2	-	1,049	(1,049)	-	**-**
Transfer from Stage 3 to Stage 1	1,174	-	(1,174)	-	**-**
Gross outstanding amount as at 31 Dec 2022	**2,676,182**	**104,608**	**28,455**	**677**	**2,809,922**

18 Loans and advances to customers, net (continued)

Loss allowances for loans and advances to customers

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 1 January 2021	**(14,144)**	**(1,826)**	**(23,050)**	**(26)**	**(39,046)**
New financial assets originated	(6,003)	-	-	-	**(6,003)**
Release due to derecognition	919	299	1,503	-	**2,721**
Transfer from Stage 1 to Stage 2	863	(863)	-	-	**-**
Transfer from Stage 1 to Stage 3	14	-	(14)	-	**-**
Transfer from Stage 2 to Stage 1	(343)	343	-	-	**-**
Transfer from Stage 2 to Stage 3	-	324	(324)	-	**-**
Transfer from Stage 3 to Stage 2	-	(56)	56	-	**-**
Transfer from Stage 3 to Stage 1	(10)	-	10	-	**-**
Increase in credit risk	(7,166)	(3,253)	(12,783)	-	**(23,202)**
Decrease in credit risk	10,175	2,392	6,032	16	**18,615**
Usage of allowance	-	-	7,726	-	**7,726**
Increase due to restructuring	-	(9)	(2)	-	**(11)**
Decrease due to restructuring	1	1	4	-	**6**
Balance at 31 Dec 2021	**(15,694)**	**(2,648)**	**(20,842)**	**(10)**	**(39,194)**
New financial assets originated	(6,807)	-	-	-	**(6,807)**
Release due to derecognition	2,559	506	2,043	-	**5,108**
Transfer from Stage 1 to Stage 2	1,028	(1,028)	-	-	**-**
Transfer from Stage 1 to Stage 3	14	-	(14)	-	**-**
Transfer from Stage 2 to Stage 1	(576)	576	-	-	**-**
Transfer from Stage 2 to Stage 3	-	2,192	(2,192)	-	**-**
Transfer from Stage 3 to Stage 2	-	(93)	93	-	**-**
Transfer from Stage 3 to Stage 1	(11)	-	11	-	**-**
Increase in credit risk	(17,426)	(7,440)	(13,244)	(99)	**(38,209)**
Decrease in credit risk	14,111	3,594	6,321	12	**24,038**
Usage of allowance	-	-	10,906	-	**10,906**
Increase due to restructuring	(5)	(12)	-	-	**(17)**
As at 31 Dec 2022	**(22,807)**	**(4,353)**	**(16,918)**	**(97)**	**(44,175)**

The following tables shows the share of customer loan portfolio which is subject to moratoriums due to COVID-19 or which has been restructured due to COVID-19. A moratorium does not automatically result in a transfer to another stage.

	31 December 2022				
Loans and advances to customers (gross outstanding amount)	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
currently under moratorium:	**-**	**-**	**-**	**-**	**-**
moratorium only	-	-	-	-	-
moratorium and restructuring	-	-	-	-	-
with expired moratorium:	**115,386**	**7,654**	**12,567**	**578**	**136,185**
moratorium only	115,386	1,180	11,685	578	128,829
moratorium and restructuring	-	6,474	882	-	7,356
with restructuring but not under moratorium:	**358**	**2,989**	**3,753**	**99**	**7,199**

	31 December 2022				
Loss allowance for loans and advances to customers	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
currently under moratorium:	**-**	**-**	**-**	**-**	**-**
moratorium only	-	-	-	-	-
moratorium and restructuring	-	-	-	-	-
with expired moratorium:	**(1,504)**	**(878)**	**(8,170)**	**(87)**	**(10,639)**
moratorium only	(1,504)	(212)	(7,442)	(87)	(9,245)
moratorium and restructuring	-	(666)	(728)	-	(1,394)
with restructuring but not under moratorium:	**(2)**	**(335)**	**(2,370)**	**(11)**	**(2,718)**

18 Loans and advances to customers, net (continued)

	31 December 2021				
Loans and advances to customers (gross outstanding amount)	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
currently under moratorium:	**-**	**-**	**-**	**-**	**-**
moratorium only	-	-	-	-	-
moratorium and restructuring	-	-	-	-	-
with expired moratorium:	**183,319**	**10,734**	**11,310**	**648**	**206,011**
moratorium only	183,306	5,906	9,210	648	199,070
moratorium and restructuring	13	4,828	2,100	-	6,941
with restructuring but not under moratorium:	**-**	**2,669**	**6,014**	**-**	**8,683**

	31 December 2021				
Loss allowance for loans and advances to customers	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
currently under moratorium:	**-**	**-**	**-**	**-**	**-**
moratorium only	-	-	-	-	-
moratorium and restructuring	-	-	-	-	-
with expired moratorium:	**(1,907)**	**(817)**	**(6,373)**	**(10)**	**(9,107)**
moratorium only	(1,907)	(357)	(5,657)	(10)	(7,931)
moratorium and restructuring	-	(460)	(716)	-	(1,176)
with restructuring but not under moratorium:	**-**	**(198)**	**(2,240)**	**-**	**(2,438)**

19 Property, plant and equipment and Intangible assets

	Land and buildings	Business and office equipment	ROU assets – buildings	Intangible assets	Total
Cost					
Balance as of 1 Jan 2021	19,320	25,864	14,550	18,729	78,463
Acquisitions	2,500	3,476	1,616	2,312	9,904
Disposals	(453)	(10,868)	(1,657)	(4,668)	(17,646)
Balance as of 31 Dec 2021	**21,367**	**18,472**	**14,509**	**16,373**	**70,721**
Depreciation					
Balance as of 1 Jan 2021	4,514	17,743	3,165	12,787	38,209
Depreciation for the period	571	2,342	1,691	1,496	6,100
Accumulated depreciation of disposal	(283)	(9,710)	(858)	(4,664)	(15,515)
Balance as of 31 Dec 2021	**4,802**	**10,375**	**3,998**	**9,619**	**28,794**
Carrying amounts					
Balance as of 1 Jan 2021	14,806	8,121	11,385	5,942	40,254
Balance as of 31 Dec 2021	16,565	8,097	10,511	6,754	41,927
Cost					
Balance as of 1 Jan 2022	21,367	18,472	14,509	16,373	70,721
Acquisitions	2,150	7,351	2,317	5,300	17,118
Disposals	(485)	(2,585)	(1,175)	(133)	(4,378)
Balance as of 31 Dec 2022	**23,032**	**23,238**	**15,651**	**21,540**	**83,461**
Depreciation					
Balance as of 1 Jan 2022	4,802	10,375	3,998	9,619	28,794
Depreciation for the period	570	2,344	1,659	1,929	6,502
Accumulated depreciation of disposal	(265)	(2,238)	(403)	(103)	(3,009)
Balance as of 31 Dec 2022	**5,107**	**10,481**	**5,254**	**11,445**	**32,287**
Carrying amounts					
Balance as of 1 Jan 2022	16,565	8,097	10,511	6,754	41,927
Balance as of 31 Dec 2022	17,925	12,757	10,397	10,095	51,174

20 Deferred tax assets

The deferred income taxes relate to the following temporary differences:

	2022	2021
Deferred tax assets		
Repossessed properties	212	354
Unused staff holiday time and retirement benefit provision	117	90
Other temporary differences	31	31
Total deferred tax assets	**360**	**475**
Deferred tax liabilities		
Property, plant and equipment	390	400
Other temporary differences	46	46
Total deferred tax liabilities	436	446
Net deferred tax assets	**(76)**	**29**

The following table analyses the change in deferred taxes:

	2022	2021
Unused staff holiday time and retirement benefit provision	27	1
Repossessed properties	(142)	(139)
Property, plant and equipment	10	31
Total change in deferred taxes (Note 13)	**(105)**	**(107)**

21 Other assets

	2022	2021
Accounts receivable	6,589	3,342
Repossessed properties	28	214
Prepayments	1,652	907
Unauthorized overdrafts	611	436
Tax receivables	32	22
Loss allowance for account receivables	(313)	(211)
Total other assets	**8,599**	**4,710**

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. At the end of 2022 the repossessed property is only residential property. Reconciliation of the carrying amount of repossessed property is presented in the following table:

21 Other assets (continued)

Repossessed property	2022	2021
Balance as of 1 January	214	549
Additions	347	-
Disposals/(sales)	(1,438)	(985)
Reversal of impairment of repossessed property	905	650
Balance as of 31 December	**28**	**214**

Fair values of repossessed property is established on the basis of internal calculations. The bank 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.

The following table discloses the other financial assets balances by three stages for the purpose of expected credit losses measurement as of 31 December 2022.

Other financial assets

	Stage 1	Stage 2	Stage 3	POCI	Total
Gross outstanding amount as at 1 Jan 2021	**4,672**	-	-	-	**4,672**
New financial assets originated	3,778	-	-	-	**3,778**
Derecognition	(4,672)	-	-	-	**(4,672)**
Gross outstanding amount as at 31 Dec 2021	**3,778**	-	-	-	**3,778**
New financial assets originated	7,200	-	-	-	**7,200**
Derecognition	(3,778)	-	-	-	**(3,778)**
As at 31 Dec 2022	**7,200**	-	-	-	**7,200**

Loss allowances for other assets

	Stage 1	Stage 2	Stage 3	POCI	Total
Balance at 1 January 2021	**(27)**	-	-	-	**(27)**
New financial assets originated	(199)	-	-	-	**(199)**
Release due to derecognition	15	-	-	-	**15**
Balance at 31 Dec 2021	**(211)**	-	-	-	**(211)**
New financial assets originated	(116)	-	-	-	**(116)**
Release due to derecognition	14	-	-	-	**14**
As at 31 Dec 2022	**(313)**	-	-	-	**(313)**

22 Liabilities to banks

	2022	2021
Current accounts	16,230	324
Total liabilities to banks	**16,230**	**324**

The current accounts include liabilities to ProCredit Bank Germany and liabilities to other banks of the ProCredit Holding group in the amount of BGN 16,218 thousand (2021: BGN 301 thousand).

23 Liabilities to customers

	2022	2021
Current accounts		
- private individuals	405,736	336,155
- legal entities	1,083,389	999,334
Total current accounts	**1,489,125**	**1,335,489**
Saving accounts		
- private individuals	511,597	415,422
- legal entities	546,361	348,988
Total saving accounts	**1,057,958**	**764,410**
Term deposit accounts		
- private individuals	193,420	204,089
- legal entities	294,480	302,473
Total term deposit accounts	**487,900**	**506,562**
Payments in transit	25,817	34,059
Total liabilities to customers	**3,060,800**	**2,640,520**

24 Liabilities to financial institutions

Institution	Final year of maturity	2022	2021
European Investment Bank (EIB)	2028	85,169	87,953
ProCredit Holding	2027	60,093	-
European Bank for Reconstruction and Development (EBRD)	2028	58,236	67,000
European Fund for Southeast Europe (EFSE)	2027	18,992	-
European Investment Fund (EIF)	2026	8,226	13,091
Total liabilities to institutions		**230,716**	**168,044**

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 2022. The loans, received by financial institutions, are not collateralized by the bank.

25 Lease liabilities

The bank as a lessee

The bank leases a number of branch premises. The leases typically run for a period of 10 years. There are few leases for long-term apartment and warehouse rentals needed to support the bank's activities.

The bank also leases short-term apartment and parking space rentals, IT equipment and water dispensers. These leases are short-term and/or leases of low-value items. The bank has elected not to recognise right-of-use assets and lease liabilities for these leases.

25 Lease liabilities (continued)

Lease liabilities can be analysed as follows:

	31 Dec 2022	31 Dec 2021
Total lease liabilities	**10,905**	**10,946**

	31 Dec 2022	31 Dec 2021
Short-term lease liabilities	1,685	1,642
Long-term lease liabilities	9,220	9,304
Total lease liabilities	**10,905**	**10,946**

Minimum lease payments	31 Dec 2022	31 Dec 2021
Up to 1 year	1,910	1,851
Between 1 and 5 years	7,244	6,905
More than 5 years	3,815	4,381
Total minimum lease payments	**12,969**	**13,137**
Reduced by the amounts representing finance costs	(2,064)	(2,191)
Present value of the minimum lease payments	**10,905**	**10,946**

	31 Dec 2022	31 Dec 2021
Interest expense on lease liabilities	367	372
Expense relating to leases of low-value assets	413	68
Total expenses related to leases	**780**	**440**

The Bank had total cash outflows for leases of BGN 1,787 thousand in 2022 (BGN 1,950 thousand in 2021).

26 Derivative financial assets and liabilities

Derivative financial assets and liabilities represent the net position of discounted interest payments from interest rate swaps with ProCredit Bank (Germany). Derivative financial assets and liabilities are presented in the table below.

		31.12.2022	
		Fair value	
	Nominal amount	Assets	Liabilities
Interest rate swaps	141,867	15,117	39
Currency spot deals	4,792	-	8
Total	**146,659**	**15,117**	**47**

		31.12.2021	
		Fair value	
	Nominal amount	Assets	Liabilities
Interest rate swaps	15,117	303	165
Currency spot deals	-	-	-
Total	**15,117**	**303**	**165**

The bank designates interest rate swaps as hedging instruments in hedging relationships (hedge accounting) in accordance with IFRS 9. These are used to hedge against changes in the fair value of fixed-interest loans attributable to interest rate risk (micro fair value hedge).

The bank hedges the fixed-interest underlying transactions with pay-fixed/receive-floating interest rate swaps in the context of micro-hedges. Underlying and hedging transactions enter into a hedging relationship in full. The critical terms of the hedging instrument and the hedged item match or are closely aligned.

27 Other liabilities

	2022	2021
Creditors	3,584	3,193
Non-income taxes payable	893	851
Deferred Income	1	1
Internal accounts	145	491
Total other liabilities	**4,623**	**4,536**

The other financial liabilities are presented in positions “Creditors” and “Internal accounts” in the table above.

28 Provisions

	2022	2021
Provisions for losses from off-balance sheet items	1,174	599
Provisions for unused staff holiday time	558	376
Provisions for post-employment benefits (see below)	335	273
Total provisions	**2,067**	**1,248**

Obligations for defined benefit retirement compensation

The estimated amount of the obligation as at each reporting date and the expenses for retirement compensation recognised 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

	2022	2021
Defined benefit obligations as of 1 January	273	222
Current service costs	32	25
Actuarial losses from changes in financial and demographic assumptions	54	26
Interest cost	4	-
Benefits paid	(28)	-
Defined benefit obligations as of 31 December	**335**	**273**

Actuarial assumptions

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

	2022	2021
Discount rate as of 31 December	1.50%	0.20%
Future salary increases	5.00%	5.00%
Inflation rate	5.00%	5.00%

29 Equity

Share capital and share premium

At the end of 2022 the capital of the bank consists of registered capital and share premium. The registered capital of BGN 232,664 thousand is divided into 232,664 thousand shares (2021: 232,664 thousand shares) with a nominal value of BGN 1 each. All shares confer equal voting power and are fully paid. The shareholder of the bank's capital is ProCredit Holding. The share premium is BGN 3,496 thousand (2021: 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 financial assets at fair value through other comprehensive income.

Retained earnings – comprise the retained profits of the bank. In 2022 the bank did not pay dividends.

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

	Liabilities to					Equity			Total
	Banks	Customers	Institutions	Lease liabilities	Other liabilities	Share capital	Reserves	Retained earnings	
Balance at 1 Jan 2021	**17**	**2,409,075**	**197,498**	**11,702**	**6,097**	**206,822**	**20,745**	**67,891**	**2,919,847**
Proceeds from liabilities to banks and institutions	-	-	39,116	-	-	-	-	-	**39,116**
Repayment of liabilities to banks and institutions	-	-	(68,566)	(1,831)	-	-	-	-	**(70,397)**
Dividend paid	-	-	-	-	-	-	-	-	**-**
Total changes from financing cash flows	**-**	**-**	**(29,450)**	**(1,831)**	**-**	**-**	**-**	**-**	**(31,281)**
Other changes									
Liability-related									
Short term liabilities to banks and institutions	307	-	-	-	-	-	-	-	**307**
Income tax expense	-	-	-	-	3,614	-	-	-	**3,614**
Income tax paid	-	-	-	-	(3,615)	-	-	-	**(3,615)**
Liabilities to customers	-	231,548	-	-	-	-	-	-	**231,548**
Unrealised gains/ losses from currency revaluation	-	(13)	-	-	-	-	-	-	**(13)**
Increase in lease liabilities	-	-	-	822	-	-	-	-	**822**
Decrease in other liabilities	-	-	-	-	341	-	-	-	**341**
Interest expense	161	785	1,161	372	-	-	-	-	**2,479**
Interest paid	(161)	(875)	(1,165)	(119)	-	-	-	-	**(2,320)**
Total liability-related other changes	**307**	**231,445**	**(4)**	**1,075**	**340**	**-**	**-**	**-**	**233,163**
Equity-related									
Revaluation of investment securities, net of taxes	-	-	-	-	-	-	(166)	-	**(166)**
Transfer	-	-	-	-	-	-	2,934	(2,934)	**-**
Capital increase	-	-	-	-	-	29,338	-	-	**29,338**
Profit for the year	-	-	-	-	-	-	-	38,737	**38,737**
Total equity-related other changes	**-**	**-**	**-**	**-**	**-**	**29,338**	**2,768**	**35,803**	**67,909**
Balance as at 31 Dec 2021	**324**	**2,640,520**	**168,044**	**10,946**	**6,437**	**236,160**	**23,513**	**103,694**	**3,189,638**
Proceeds from liabilities to banks and institutions	-	-	97,792	-	-	-	-	-	**97,792**
Repayment of liabilities to banks and institutions	-	-	(35,599)	(1,649)	-	-	-	-	**(37,248)**
Dividend paid	-	-	-	-	-	-	-	-	**-**
Total changes from financing cash flows	**-**	**-**	**62,193**	**(1,649)**	**-**	**-**	**-**	**-**	**60,544**
Other changes									
Liability-related									
Short term liabilities to banks and institutions	15,906	-	-	-	-	-	-	-	**15,906**
Income tax expense	-	-	-	-	4,910	-	-	-	**4,910**
Income tax paid	-	-	-	-	(3,570)	-	-	-	**(3,570)**
Liabilities to customers	-	420,197	-	-	-	-	-	-	**420,197**
Unrealised gains/ losses from currency revaluation	-	(529)	-	-	-	-	-	-	**(529)**
Increase in lease liabilities	-	-	-	1,379	-	-	-	-	**1,379**
Increase in other liabilities	-	-	-	-	(169)	-	-	-	**(169)**
Interest expense	1,321	866	2,735	367	927	-	-	-	**6,216**
Interest paid	(1,321)	(254)	(2,256)	(138)	-	-	-	-	**(3,969)**
Total liability-related other changes	**15,906**	**420,280**	**479**	**1,608**	**2,098**	**-**	**-**	**-**	**440,371**
Equity-related									
Revaluation of investment securities, net of taxes	-	-	-	-	-	-	(1,675)	-	**(1,675)**
Transfer	-	-	-	-	-	-	2,934	(2,934)	**-**
Profit for the year	-	-	-	-	-	-	-	39,440	**39,440**
Total equity-related other changes	**-**	**-**	**-**	**-**	**-**	**-**	**1,259**	**36,506**	**37,765**
Balance at 31 Dec 2022	**16,230**	**3,060,800**	**230,716**	**10,905**	**8,535**	**236,160**	**24,772**	**140,200**	**3,728,318**

31 Contingent liabilities and commitments

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

	2022	2021
Commitments to extend credit	482,315	410,376
Letters of credit and letters of guarantee	113,683	70,418
Total contingencies and commitments	**595,998**	**480,794**

Provisions for financial off-balance sheet commitments	**2022**	**2021**
Beginning of the year	599	682
Release	(51)	(579)
Additions	515	496
Increase/(Decrease) in credit risk	111	-
End of the year	**1,174**	**599**

32 Related party transactions

ProCredit Holding is the sole shareholder, the ultimate parent and ultimate controlling party of the bank. ProCredit Bank has stand-by line agreement for EUR 10 million with ProCredit Holding, directed towards liquidity management, which is not utilised at the end of 2022. The bank pays commitment fee under the stand-by line agreement. Banks from ProCredit Holding group keep current accounts placements with the bank, which are disclosed in Note 22.

The volumes of related party transactions outstanding at year end, and associated expenses and income for the year are as follows:

Transactions/balances with ProCredit Holding	**2022**	**2021**
Other income earned	224	202
Liabilities at the end of the period	60,219	129
Interest expense incurred	1,418	-
Other expenses incurred	3,302	3,031
out of which fee expenses to Stand-by line	69	69

Transactions with subsidiaries	**2022**	**2021**
Loans and advances at the end of the period	11,420	10,400
Interest income earned	192	183
Other income earned	24	29
Liabilities at the end of the period	83	3
Lease liabilities at the end of the period	6,646	7,120
Other expenses incurred	1,033	1,022

32 Related party transactions (continued)

Transactions/balances with other ProCredit group entities	2022	2021
Loans and advances at the end of the period	260,532	74,418
Interest income earned	1,925	132
Other income earned	15,123	2,017
Liabilities at the end of the period	16,296	485
Interest expense incurred	1,329	460
Other expenses incurred	2,731	3,489

In 2022 the total compensation of key management personnel was BGN 936 thousand (2021: BGN 1,362 thousand). The compensation is remuneration only and there are no other compensations of the key management.

33 Other information required by law

ProCredit Bank (Bulgaria) EAD has one branch in Greece. The branch was founded in 2015 and is providing full range of banking services. The headquarters of the bank and its administration are located at Sofia, 26 Todor Aleksandrov Blvd, while the branch in Greece is located at Thessaloniki 54627, 54-56, 26th October str. & Pegasus str. In the table below is presented more information required by the Law on Credit Institutions, article 70, paragraph 6 and 7.

As of 31 Dec 2022	ProCredit Bank (Bulgaria) EAD	ProCredit Bank (Bulgaria) EAD - Thessaloniki Branch
Turnover	119,441	26,482
Number of employees	432	26
Operating result before taxes	44,349	10,046
Tax expenses	4,910	1,408
Return on average assets	1.1%	1.4%
State subsidies	193	-

As of 31 Dec 2021	ProCredit Bank (Bulgaria) EAD	ProCredit Bank (Bulgaria) EAD - Thessaloniki Branch
Turnover	103,909	19,553
Number of employees	385	21
Operating result before taxes	42,458	5,618
Tax expenses	3,721	-
Return on average assets	1.3%	1.0%
State subsidies	16	-

34 Subsequent events

There are no significant post balance sheet events with effect on the separate financial statements as of 31 December 2022.

Separate Annual Activity Report of the Management of ProCredit Bank (Bulgaria) EAD for 2022

Description of the activity

ProCredit Bank (Bulgaria) EAD ("ProCredit Bank" or the "bank") was established in October 2001 as a result of the founding meeting of shareholders — namely the European Bank for Reconstruction and Development ("EBRD"), the International Finance Corporation ("IFC"), ProCredit Holding AG & Co. KGaA ("ProCredit Holding"), Deutsche Investitions-und Entwicklungsgesellschaft (DEG) and Commerzbank AG. The bank was registered with the Sofia City Court as a Bulgarian joint-stock company on 28 September 2001. Since the beginning of 2013, the sole owner of the capital of the bank is ProCredit Holding.

ProCredit Holding is the parent company of the bank and supervises its activities.

The bank is supervised by a Supervisory Board comprising five members and a Management Board comprising four members elected for a period of three years.

ProCredit Bank supports development and provides full range of banking services. The bank provides services to both business clients and private individuals. In its activities, ProCredit Bank adheres to several basic principles: transparency in communication with clients; consumer lending is not encouraged; only services that are based on both an understanding of the client's profile and an in-depth financial analysis are provided. This responsible approach to banking enables the establishment of long-term partnerships with clients based on mutual trust and cooperation.

In dealing with business clients, ProCredit Bank focuses on small and medium-sized enterprises, as it believes that they create jobs and make a vital contribution to the economies in which they operate. By offering understandable and affordable deposits and other banking services and promoting a savings culture for private individuals, ProCredit Bank strives to build a culture of savings and responsibility that contributes to greater stability and security in the households.

The bank structures its clients according to their business potential, the groups being – business clients: small and medium-sized enterprises, and private individuals. Business clients, that receive services from ProCredit Bank, include commercial companies, agricultural producers and self-employed persons, while the focus on individuals is on regular income earners and business owners. The bank strives to have a detailed knowledge of its clients in terms of business model, business development and investment plans, as it aims at being able to apply to each client an individual approach, as well as a long-term strategy for the services it provides. The bank's strategic focus is on manufacturing companies, agricultural producers, financing of projects in the field of energy efficiency, environmental protection and renewable energy. ProCredit Bank also focuses on serving private individuals who appreciate modern banking services, who have the capacity to save and who prefer to do their banking through electronic channels (direct banking strategy).

The bank's shareholder expects a sustainable return on investment over the long term, and short-term profit maximisation is not the goal. ProCredit Bank invests heavily in the training and development of its employees in order to create an open and productive working atmosphere and to provide professional and competent customer service.

As of the end of 2022, the bank's operations were carried out through its headquarters in Sofia, 6 branches in Bulgaria and 1 branch in Thessaloniki (Greece). The branch network covers the main business regions of the Republic of Bulgaria and thus the bank offers a full range of banking services throughout the country.

Separate Annual Activity Report (continued)

Development and results from operations in 2022

In 2022, ProCredit Bank continued its efforts to improve efficiency in its operations while focusing on expanding the capacity for providing qualitative and competent service as well as on building long-term relationships with its clients. The bank operates an adequate institutional structure in the form of specialised departments and close communication between them and the head office and the branch network. The changes in the processes in the bank aim at increasing the efficiency and quality of work of the institution. The following main developments occurred in 2022:

- Despite the challenging environment shaped by energy-sector and supply chain disruptions, rising energy prices, growing inflation and interest rates and the resulting economic uncertainty, there was a solid increase in the loan and deposit portfolio of the main target groups of clients – small and medium-sized enterprises and private individuals; the growth in the total loan portfolio in 2022 was 17.2%, while the total deposit portfolio grew by 15.9% (this growth was ahead of the average for the banking system for both portfolios). The results achieved with respect to the main business segments were based on the optimised and focused process of attracting customers and approval of financing, on the development of individual strategies for dealing with companies and individuals, as well as on the focused efforts of the bank to attract the entire banking business of its customers and to increase clients' activity regarding banking operations. At the same time, the quality of the loan portfolio remained on a very good level compared to the market average as the share of loans classified in Stage 3 according to IFRS 9 dropped from 1.6% as of 31 December 2021 to 1.0% as of 31 December 2022 as a result by intensive monitoring, considering the impact of the external factors on the economic sector as well as the liquidity and earnings situation of the respective company.
- The bank continued its structured and focused approach in attracting new business and private clients and their overall banking business, as the total number of clients increased by 8% in 2022 compared to the end of 2021 (the growth was 7% in 2021). This was facilitated by the developed and improved infrastructure, ensuring the implementation of the concept of direct banking (including the possibilities for remote identification of customers, as well as for attracting customers through digital channels). Simultaneously, the average monthly number of performed main banking operations from one client also increased in 2022 compared to 2021. These developments proved the resilience and sustainability of the bank's business model even in the times of stress.
- Investments were made in the development of new functionalities of the information systems and in the platform for performing electronic banking operations (ProBanking internet banking system). The developments are directed to onboarding and servicing of clients (business and private), providing digital solutions for bank operations and optimization of the internal processes. The bank's Contact Centre continued to provide highly professional servicing and to play a key role in the process of attracting customers. Remote video identification is used to serve current customers, and this technology allows the extension of customer service in an efficient and secure way providing opportunity for remote electronic signing of relevant documents. As of the end of 2022 virtually 100% of clients operations are performed electronically (via ProBanking; card transactions; ATM transactions).
- Projects related to environmental management were implemented, such as: continuing financing of green investments; expanding the opportunities for providing loans for the construction of photovoltaic power plants; construction of charging stations for electric vehicles throughout Bulgaria, as well as in the region of Thessaloniki in Greece (a total of 75 such installations were constructed and included in specially developed mobile application; additionally, in cooperation with another company, 20 charging stations were installed in Bulgaria); conducting awareness-raising and staff training campaigns, as well as sharing an internal newsletter; the bank took part in a number of events related to the topics of sustainable development and environmental protection; the external certification of ProCredit Bank's environmental management system was confirmed according to the ISO 14 001:2015 standard.
- The bank conducted marketing campaigns aimed at attracting new customers (businesses and individuals). This significantly supported the institution's efforts to increase its customer base.

Separate Annual Activity Report (continued)

Development and results from operations in 2022 (continued)

In addition to its clients, ProCredit Bank builds long-term relationships with its employees. This starts from the outset – with a serious and transparent selection process for future employees. The aim is to attract dedicated individuals who understand and support the way the bank operates and are willing to contribute to the common good. All future employees of the bank are subject to the same selection process. During the programme, participants acquire knowledge and skills in both banking and communication and analytical thinking disciplines. The course includes classes in theory and practical training. The institution adheres to a responsible approach to staff that is applied by the entire ProCredit Group, respects its ethical values and does not tolerate discrimination. ProCredit Bank is convinced that this guarantees successful future cooperation with employees as well as an open and stimulating work environment. The bank is strongly committed to providing opportunities for continuous training and development of staff at all levels. Along with internal career growth, these opportunities contribute to building a strong and motivated team. In order to meet the requirements for the responsibilities of management positions, all managers must attend courses at the ProCredit Group's academies. In 2022, the bank invested BGN 2,385 thousand in the training of its employees (2021: BGN 1,532 thousand).

In 2022, ProCredit Bank reaffirmed its commitment to the development of the Bulgarian business and to the promotion of a savings culture and practice of building family assets among households in the country. The bank continued to actively provide new loans and to support the implementation of various business projects of its clients. The new business in the form of newly extended loans in 2022 amounted to BGN 1,370 million (2021: BGN 1,113 million) (including undrawn commitments), and the net loan portfolio recorded a 17.2% increase on the level at the end of 2022 (2022: BGN 2,766 million, 2021: BGN 2,360 million). As a result of the bank's deliberate efforts to develop a savings culture among its customers, as well as to attract their entire banking business, in 2022 customer deposits recorded a solid increase compared to the previous year. The increase was 15.9% compared to the end of 2021, and as of 31 December 2022 the total deposit base amounted to BGN 3,061 million (2021: BGN 2,641 million). It is important to note the growth of BGN 439 million (or 20.6%) registered in current and FlexSave accounts. Total assets increased by 16.9% compared to the end of 2021 and reached BGN 3,728 million as of end 2022 (2021: BGN 3,190 million). The active clients, serviced by ProCredit Bank at the end of 2022, were 53,000.

ProCredit Bank has a strategic focus on providing services to manufacturing companies, as they have the opportunity for sustainable development and their operations have a significant effect on employment in individual regions. More than 400 such companies were financed in 2022; the total value of the loans granted amounted to BGN 437 million in 2022.

The bank retained its leading position on the Bulgarian financial market in terms of servicing agricultural producers; it had almost 3,000 clients as of end 2022 who are farmers. In 2022, loans disbursed to agricultural producers amounted to BGN 362 million. The bank is among the leading credit institutions in the country by this indicator.

Separate Annual Activity Report (continued)

Development and results from operations in 2022 (continued)

Another focus of the bank's operations during the year in respect of business clients was the participation in joint programmes with the European Investment Fund (EIF). ProCredit Bank continued to provide financing to small and medium enterprises in 2022 under the following EIF's programs: InnovFin through Horizon 2020 financial instruments; JEREMIE Bulgaria - Documentary Finance Guarantee for a portfolio of loans and documentary operations; ESIF EAFRD Greece for a portfolio of loans to agricultural producers (applicable to Greek borrowers); ESIF ERDF Greece for a portfolio of loans to SMEs (applicable to Greek borrowers); Pan-European Guarantee Fund in response to COVID-19. As of the end of 2022, over 7,500 loans in the amount of EUR 975 million have been granted under joint programmes with the EIF and the HDB. ProCredit Bank will continue to further expand its cooperation with the EIF on SME financing programmes in 2023 as well.

An important aspect of the bank's operations is its commitment to activities aimed at protecting the environment, improving energy efficiency and reducing the ecological footprint. All banks within the ProCredit Group set high standards in terms of the impact of their operations on the environment. ProCredit banks have a three-pronged approach to challenges, related to the protection of the environment:

First pillar: Internal environmental management system: an approach to better understand and improve the sustainable energy consumption and the bank's environmental impact has been introduced in the bank's internal organisation of work.

Second pillar: Environmental risk management in lending: an environmental protection system based on a continuous evaluation of the loan portfolio (including the rejection of loan applications submitted by enterprises engaged in activities that are considered environmentally risky) has been implemented.

Third pillar: Promoting "green finance": ProCredit Bank aims to promote economic development that is as consistent as possible with the sustainable use of the environment. In practice, this means engaging in projects that are implemented in the following areas: (1) Improving energy efficiency; (2) Renewable energy production; (3) Measures having a favourable environmental impact. The bank builds the necessary administrative and expert capacity to enable it to be even more active in supporting its clients for the implementation of such projects.

The bank applies specially developed internal methodology that allows it to analyse and evaluate clients' investments in the field of energy efficiency, environmental protection and renewable energy production. In 2022, ProCredit Bank financed the implementation of "green" projects by both business clients and private individuals. The loans granted reached BGN 824 million as of 31 December 2022, and the bank's "green" portfolio realised a total growth of 26% in 2022 compared to the end of 2021 (mainly driven by increase of the renewable energy production financing) and reached 29% share in the total loan portfolio (31.12.2022: 28%). The financing of projects related to improving energy efficiency, environmental protection and renewable energy will continue to be in the focus of the bank's business in 2023.

Throughout the reporting year, ProCredit Bank continued to encourage its clients to use full banking services from the institution, and the various opportunities for electronic and cashless transactions such as Internet banking, the use of bank cards and various devices available in the 24-hour service areas and communication with the Contact Centre were key elements of the business strategy. This approach saves clients' time while allowing employees to focus on quality of service and customer consultations.

Separate Annual Activity Report (continued)

Development and results from operations in 2022 (continued)

Regarding the quality of the bank's assets, as a result of the organised and structured approach to dealing with non-performing loans the level of such exposures is significantly lower than the average for the banking system. As of 31 December 2022, exposures overdue by more than 90 days amounted to 0.55% of the total loan portfolio, while the similar indicator for the banking system as of the same date, according to data published by the BNB, was 3.2%. The value of one of the main indicators that the bank monitors in the process of credit risk management – the ratio of the amount of loans overdue by more than 30 days to the total loan portfolio – was 0.61% as of 31 December 2022 (2021: 1.0%).

Financial indicators

The financial indicators presented below are based on the annual separate financial statements prepared in accordance with the International Financial Reporting Standards (IFRS).

Statement of Profit and Loss

Net interest income

The amount of net interest income reported during the financial year 2022 was BGN 78,218 thousand (2021: BGN 68,444 thousand); the change compared to the previous year is an increase of 14.3%.

Interest income: interest income is in the amount of BGN 84,434 thousand 96.2% of which comprised interest income from loans granted. Compared to 2021 (BGN 72,743 thousand), the total interest income has increased by 16.1% as a result of an increase in the loan portfolio and stable net interest margin in 2022.

Interest expenses: the total interest expenses in 2022 amounted to BGN 6,216 thousand (2021: BGN 4,299 thousand); the main portion of the interest expenses (86.1%) comprised interest accrued on borrowings from banks, other financial institutions and lease liabilities of BGN 5,351 thousands (2021: BGN 1,694 thousands). The remaining interest expenses constituted interest on funds deposited by clients and amounted to BGN 865 thousand (13.9%) (2021: BGN 785 thousand). Compared to 2021, the total interest expenses increased by 44.6%. The bank utilized new loans from IFIs for BGN 97,792 thousands in 2022 which are compliant with the requirements for eligible liabilities in accordance with the Law on the Recovery and Resolution of Credit Institutions and Investment Firms (LRRCIIF), which was the main reason for the increase of the interest expenses to IFIs.

Net fee and commission income

The reported net commission income amounted to a total of BGN 27,886 thousand (2021: BGN 25,585 thousand). The total increase was 9.0%.

Commission income: the total amount of commission income was BGN 31,933 thousand and registered increase of 11.0% compared to 2021 (BGN 28,769 thousand). The growth was driven by the increased number of banking operations as card fees, cash fees and money transfers had the largest contribution.

Commission expenses: the total amount of commission expenses was BGN 4,047 thousand in 2022. Compared to 2021 (BGN 3,184 thousand), the total amount of charges paid increased by 27.1%. This was mainly due to increased fees for card transaction services and payments.

Separate Annual Activity Report (continued)

Financial indicators (continued)

Result from foreign exchange transactions

The net trading income in 2022 totalled BGN 10,310 thousand (2021: BGN 8,839 thousand) and registered increase of 16.6% driven by the growth of number and volume of customers' operations. The total net trading income includes gains from foreign exchange transactions and currency revaluations.

Other operating income/expenses

The income or expenses related to valuation, sale and administration of acquired assets, which were collateral for problematic exposures, are reported under this position. In 2022, the bank realised a profit of BGN 794 thousand, which was an increase compared to 2021 (BGN 660 thousand).

Expenses according to the Statement of Profit and Loss

Loss allowance of financial assets: in 2022 the bank accrued loss allowances in the amount of BGN 13,245 thousand (2021: BGN 6,327). The 2022 result is related to growth of the loan portfolio and increased credit risk for certain exposures, which are assessed individually.

Operating expenses: the operating expenses of the bank in 2022 totalled BGN 61,846 thousand; this is a 12.2% increase on the 2021 amount (BGN 55,123 thousand). The main items, in which growth was realized, were: personnel expenses, training-related expenditures (including travel for training purposes), communication and transport costs, marketing costs, utilities, non-income tax expenses, services costs.

The breakdown of expenses by line items in the Statement of Profit and Loss for 2022 is as follows:

- personnel expenses: BGN 24,339 thousand (2021: BGN 23,256 thousand).
- non-income tax expenses: BGN 6,555 thousand (2021: BGN 5,326 thousand).
- depreciation of assets: BGN 6,502 thousand (2021: BGN 6,100 thousand).
- other operating expenses: BGN 24,450 thousand (2021: BGN 20,441 thousand).

Financial result

The financial result of the bank before tax amounted to BGN 44,350 thousand (2021: BGN 42,458 thousand), and after tax: BGN 39,440 thousand (2021: BGN 38,737 thousand). The bank reported 1.8% increase in the net profit, driven by the growth of the operating income of the institution. The return on equity in 2022 was 10.3% (2021: 11.8%). By this indicator ProCredit Bank was slightly below the average for the banking system (12.3% in 2022).

Separate Annual Activity Report (continued)

Financial indicators (continued)

Statement of Financial Position

ASSETS

As of 31 December 2022, the assets of ProCredit Bank at carrying amount had a value of BGN 3,728,318 thousand (2021: BGN 3,189,638 thousand); a 16.9% increase on the previous year was reported driven by the growth of the customer loan and deposit portfolios.

Cash and cash equivalents

The cash and cash equivalents on 31 December 2022 amounted to BGN 561,028 thousand (2021: BGN 583,408 thousand). The change compared to the previous year is a 3.8% decrease.

Loans and advances to banks

Loans and advances to other banks as of 31 December 2022 amounted to BGN 245,476 thousand (2021: BGN 122,085 thousand). The change compared to the previous year is a 101.1% increase, following the removal by the BNB of limitations for foreign placements, introduced back in 2020 in relation to the COVID crisis. The loans and advances at the end of 2022 comprised cash in current accounts and bank deposits.

Investment securities

The value of investment securities as of 31 December 2022 was BGN 72,545 thousand (31 December 2021: BGN 68,561 thousand). They include two main groups of assets: (1) investments in government securities that are treated as a liquidity buffer (2022: BGN 65,393 thousand and 2021: BGN 61,455 thousand) and (2) shareholdings in companies performing financial intermediation activities (2022: BGN 7,152 thousand and 2021: BGN 7,106 thousand). The bank does not invest in financial instruments for the purpose of generating speculative profits and this is stipulated in its risk management strategy and policies.

At the end of 2022 the bank's liquid assets (cash and balances on accounts with central banks, loans and advances to other banks with remaining maturity of up to 7 days and investments in government securities) totalled BGN 832,731 thousand (2021: BGN 766,948 thousand). This was a 8.6% increase compared to 2021. This corresponds to a high level of the total liquid assets to customer deposits ratio which was 27.2% as of 31 December 2022 (31 December 2021: 29.0%). The stable level of liquidity at the end of 2022 was the result of the solid growth in funds deposited by clients. In 2023 the bank expects the loan portfolio growth to be mainly financed by increase of the customer deposit portfolio, thus allowing to maintain the liquidity levels.

Loans to customers

The loans granted to customers have a major share in the bank's assets and as at 31 December 2022 the carrying amount of these assets was BGN 2,765,747 thousand, or 74.2% (2021: 74.0%) of the total assets. Compared to 2021 (BGN 2,359,983 thousand), the value of the loan portfolio increased by 17.2%. The growth achieved can be attributed to the active targeting and the strong strategic focus for providing services and financing to small and medium-sized enterprises with a formalised structure, high-quality management and a sustainable business model. More than 40% of the loan portfolio growth in 2022 was attributable to green loans.

Separate Annual Activity Report (continued)

Financial indicators (continued)

The bank's focus is on providing complete banking servicing to small and medium-sized enterprises. Therefore, the loan portfolio of these clients has a dominant share in the total portfolio of ProCredit Bank – as of 31 December 2022 its value amounted to BGN 2,428,703 thousand, or 87.8% from the total loan portfolio. During the year, there was a growth of 16.5% compared to the end of 2021 (BGN 2,084,704 thousand). The housing loans to private individuals were another major focus. Their amount as of 31 December 2022 was BGN 260,214 thousand or 9.4%, and this portfolio realised a growth of 11.2% in 2022 (2021: BGN 234,092 thousand).

Fixed assets

The carrying amount of fixed tangible and intangible assets as of 31 December 2022 was BGN 51,174 thousand, increasing its value compared to the previous year (2021: BGN 41,927 thousand).

Other assets

As of 31 December 2023, the other assets of the bank amounted to BGN 8,599 thousand (2021: BGN 4,710 thousand). The change is an 82.6% increase. Assets acquired as a result of default of loan agreements decreased to BGN 28 thousand at the end of 2022 (2021: BGN 214 thousand). Active measures, related to marketing promotion and a realisation plan, are in place for the sale of such assets.

LIABILITIES

Liabilities to banks and institutions

As of 31 December 2022 the total value of borrowings from banks and institutions was BGN 246,946 thousand. This amount included BGN 16,230 thousand in payables to banks and BGN 230,716 thousand in borrowings from international financial institutions. Compared to 2021 (BGN 168,368 thousand), the total amount of financing from these counterparties increased by 37.3%. The bank utilised new funding from ProCredit Holding, EBRD and EFSE and repaid at maturity liabilities to EIB, EIF and EBRD. The newly received loans are compliant with the requirements for eligible liabilities in accordance with the LRRCIIF.

Liabilities to customers

As of 31 December 2022 the funds deposited by customers of the bank amounted to BGN 3,060,800 thousand (2021: BGN 2,640,520 thousand). Compared to the previous year, the funds, deposited by customers, registered solid growth of 15.9%. The growth was driven by attracting business clients and individuals and their entire banking business, as well as to the opportunities for active management and use of the funds.

Equity

The bank's equity includes share capital and premium reserve in the amount of BGN 236,160 thousand (2021: BGN 236,160 thousand) and retained earnings and reserves in the amount of BGN 164,972 thousand (2021: 127,207 thousand). In 2022 the bank did not pay dividends.

Separate Annual Activity Report (continued)

Financial indicators (continued)

The share capital of BGN 232,664 thousand is distributed in 232,664 thousand shares with a nominal value of BGN 1 each. Each share gives one voting right to its holder. The share capital of the bank is as follows:

Shareholder	2022 Number of shares (thousands of shares)	2022 Share (%)	2021 Number of shares (thousands of shares)	2021 Share (%)
ProCredit Holding	232,664	100.0%	232,664	100.0%
Total shares	**232,664**	**100.0%**	**232,664**	**100.0%**

Research and Development Activities

The bank does not carry out activities in the field of research and development.

Information about acquisition of own shares, required pursuant to Article 187e of the Commerce Act

The bank has not acquired its own shares.

Information pursuant to Article 247 of the Commerce Act

In 2022, the total remuneration of the members of the bank's Management Board amounted to BGN 936 thousand (2021: BGN 1,362 thousand). The members of the Supervisory Board do not receive remuneration from the bank.

The members of the Management Board and the Supervisory Board do not hold and have not carried out acquisition or transfer of shares or bonds of the bank in 2022.

The members of the Management Board and the Supervisory Board have the following participation in other companies (in accordance with the provisions of Article 247(2)(4) of the Commerce Act):

Members of the Supervisory Board

Petar Slavov, Chairperson
- ProCredit Properties EAD – member of the Supervisory Board
- ProCredit Razvitie Bulgaria AD – member of the Board of Directors
- ProCredit Education AD – member of the Supervisory Board
- Progled OOD – partner and Managing Director
- Private High School "Denis Diderot" – member of the Supervisory Board
- Association ProCredit Health – member of the Management Board
- Borica AD - member of the Board of Directors

Patrick Zeitinger
- ProCredit Academy GmbH – member of the Supervisory Board
- Banco ProCredit C.A. Ecuador – member of the Supervisory Board

Separate Annual Activity Report (continued)

Members of the Supervisory Board (continued)

Gian Marco Felice
- ProCredit Bank Bosnia – chairperson of the Supervisory Board
- Banco ProCredit C.A. Ecuador – deputy member of the Supervisory Board
- ProCredit Bank Germany – member of the Supervisory Board
- ProCredit Bank Romania – chairperson of the Supervisory Board
- ProCredit Bank Georgia – member of the Supervisory Board
- ProCredit Bank Serbia – chairperson of the Supervisory Board
- ProCredit Bank Ukraine – chairperson of the Supervisory Board
- Quipu GmbH – chairperson of Supervisory Board
- ProCredit Holding AG & Co. KGaA – member of the Management Board
- ProCredit General Partner AG – member of the Management Board
- ProCredit Academy GmbH – chairperson of the Supervisory Board

Ben Knapen
- ProCredit Holding AG & Co. KGaA – member of the Supervisory Board
- ProCredit General Partner AG – member of the Supervisory Board

Hubert Spechtenhauser
- ProCredit Holding AG & Co. KGaA – chairperson of the Management Board
- Banco ProCredit C.A. Ecuador – member of the Supervisory Board
- ProCredit Bank Serbia – member of the Supervisory Board

Members of the Management Board

Reni Peycheva
- Private High School “Denis Diderot” – member of the Supervisory Board
- Association ProCredit Health – member of the Management Board

Rumyana Todorova
- ProCredit Properties EAD – member of the Management Board
- Association ProCredit Health – member of the Management Board

Ivan Dachev
- ProCredit Razvitie Bulgaria AD – executive director and member of the Board of Directors
- Private High School “Denis Diderot” – member of the Supervisory Board
- ProCredit Properties EAD – member of the Supervisory Board
- Association ProCredit Health – member of the Management Board

Kamelia Mineva
- ProCredit Education EAD – member of the Management Board
- ProCredit Razvitie Bulgaria AD – member of the Board of Directors
- Association ProCredit Health – member of the Management Board
- PV Energy EOOD – manager and owner

In 2022 the members of the Supervisory Board and of the Management Board of the bank did not enter into contracts with the bank outside its normal course of business or contracts that substantially deviated from market conditions though being part of its normal course of business.

Separate Annual Activity Report (continued)

Significant events that occurred after the date of the annual financial statements

There are no significant post balance sheet events with effect on the separate financial statements as of 31 December 2022.

Structure of the bank

As of 31 December 2022 the bank operated with 6 branches on the territory of Bulgaria and 1 branch in Greece (Thessaloniki). The headquarters of the bank and its administration are located at Sofia, 26 Todor Aleksandrov Blvd. The bank's staff as of 31 December 2022 consisted of 432 employees (excluding employees on maternity leave and employees involved in ancillary activities).

Financial instruments and management of financial risks

The financial instruments used by the bank, the policies for their measurement and presentation, as well as the bank's exposure to credit, market and liquidity risk are described in Note 4 of the annual separate financial statements.

Expected development of ProCredit Bank (Bulgaria) EAD and goals for 2023

The economic environment, shaped by the pandemic effects and significant uncertainties poses very serious challenges for the upcoming business and social development in 2023. Disruptions of economic activity and supply chains, growing inflationary pressures due to rising food and energy prices, worsening of external conditions are part of the effects directly impacting economic activity. As the Bulgarian economy is open and dependent on external factors, it depends on the development of the external partners from the EU as well as on the optimal utilisation of the EU structural funds in order to perform positively.

Separate Annual Activity Report (continued)

Expected development of ProCredit Bank (Bulgaria) EAD and goals for 2023 (continued)

Notwithstanding the above, Bulgarian banks started 2023 with high levels of liquidity and capitalisation and this largely implies stability for their clients. Considering the market situation, ProCredit Bank will take a prudent approach to lending to small and medium-sized enterprises, aiming to support the strengthening of their stability, improving efficiency and accelerating their development and growth. The bank applies a case-by-case and pragmatic approach to assessing the financial position of its clients in order to be able to offer the most optimal financing solution in terms of maintaining and improving creditworthiness.

The bank will maintain long-term relationships with its current and future clients by expanding and deepening its business relationships with them, thus aiming to be the leading partner as the “Hausbank” for small business clients and a significant banking partner for medium-sized businesses. It is also important to continue increasing the absolute number of business clients and thus improving diversification and confirming the market position. ProCredit Bank plans solid and balanced growth in the loan portfolio with Small and Medium business clients as there are good opportunities to attract new good clients while maintaining high-quality portfolio and interest margins overall. The areas of agricultural lending, green lending and lending to production companies hold special focus for the bank. Deposit portfolio of business customers is also planned to grow within the overall concept for attracting and increasing the turnover of the clients.

The bank wants to be an innovative partner as a reliable direct bank for middle- and high-income private clients, offering all transaction services and flexible saving opportunities through accessible and secure electronic channels, and thereby secure a growing volume of deposits to finance the loan portfolio growth. A major objective for 2023 remains to increase the total number of private clients through an active and targeted acquisition strategy. Both deposit and loan portfolios of private customers will continue to grow through increase generated by both existing clients and through new core clients attracted by the digital banking offer. The share of the private customers loan portfolio is expected to remain close to its current levels of the total portfolio.

In 2023, the main driver of the balance sheet development will be the planned operational growth in the gross loan portfolio, which will lead to increase in the interest income. However, in a continued environment of growing market interest rates, maintaining margins stable by optimising the funding prices is an important challenge which the bank will face. The share of net fee income in operating income is projected to gradually increase its share in the total operating income in line with the expected growth of the business turnover and operations of the bank’s clients. At the same time, the high quality of the assets and the optimised structure of the bank will result in optimised impairment costs and administrative expenses. Liquidity and capital adequacy levels will be maintained with sufficient buffers in the long run.

The bank’s development strategy for 2023 is in line with its business philosophy: ProCredit Bank believes that open and active communication with customers, a responsible approach to day-to-day banking and the very good quality of the services provided make it one of the first choice banks for the client. ProCredit Bank also aims to become a reliable and main partner of companies and citizens in the implementation of projects in the field of “green finance” by applying a comprehensive methodology and expert potential for environmental financing as part of the bank’s integrated approach to the environment especially in the financing of renewable energy projects and green activities such as waste management.

Separate Annual Activity Report (continued)

Management responsibilities

The annual separate financial statements for 2022 were prepared in accordance with the International Financial Reporting Standards and reflect fairly the property and financial position of the bank and its financial results for the reporting period. The annual separate financial statements were prepared on the going concern basis and the accounting policies of the bank were consistently applied, and all estimates and assumptions were made in accordance with the precautionary principle in the preparation of the separate financial statements for 2022.

The management is responsible for the correct keeping of accounting records, for the appropriate management of the assets and for taking necessary steps to prevent and detect potential fraud and other irregularities.

The separate annual activity report was approved by the Management Board and signed on its behalf by:

Reni Peycheva
Executive Director and
Member of the Management Board
13 April 2023

Ivan Dachev
Executive Director and
Member of the Management Board

Separate corporate governance declaration

Documents of corporate management

ProCredit Bank (Bulgaria) EAD ("ProCredit Bank" or the "Bank") complies with the following documents with respect to its corporate governance:

1. **Articles of association (By-laws) of ProCredit Bank:** a fundamental document regulating the establishment and competences of the bank's main management bodies. The Articles of association are available for review by interested parties in the file of ProCredit Bank in the Commercial Register: (https://portal.registryagency.bg/CR/Reports/VerificationPersonOrg). The Articles of association were adopted by the General Meeting of Shareholders. As of 31 December 2022, the Articles of association can be amended only at the meetings of the Sole owner of the capital of the bank.
2. **Code of Conduct of ProCredit Group**. Corporate values form the foundation of the business ethics of the bank as part of ProCredit Group. The following principles guide the activities of ProCredit institutions: Transparency; Culture of open communication; Social responsibility and tolerance; High professional standards; Integrity and personal commitment. These principles are the backbone of ProCredit's corporate culture and are actively applied in the day-to-day work of the institution. They are described in the Code of Conduct of ProCredit (accessible at https://www.procreditbank.bg/web/files/richeditor/coc-web-202006.pdf) which translates the Group's ethical principles into practical guidelines for the entire team of the bank.

In the past year 2022, ProCredit Bank complied without exception with the requirements of the documents listed above in relation to its corporate governance. The bank also complies with the National Corporate Governance Code, as appropriate (http://www.bse-sofia.bg/?page=CodeGovernance).

Information regarding the requirements set out in Article 10(1) of Directive 2004/25/EC of the European Parliament and of the Council of 21 April 2004:

- Point (c) is not applicable to the bank because it does not have significant direct and indirect shareholdings (including indirect shareholdings through pyramid structures and cross-shareholdings) within the meaning of Article 85 of Directive 2001/34/EC.
- Point (d) is not applicable to the bank because it does not hold securities with special control rights.
- Point (f) is not applicable to the bank because it does not hold significant investments in other companies and there is no information regarding restrictions on voting rights.
- Point (h). The rules governing the appointment and replacement of members of the Management Board and the Supervisory Board and the amendment of the articles of association are set out in the Articles of association of the bank; the members of the Management Board are appointed by the Supervisory Board for a term of 3 years. The members of the Supervisory Board are appointed by the Sole owner of the capital for a term of 3 years. Decisions to amend the articles of association are taken by the Sole owner of the capital of the bank.
- Point (i). The powers of the members of the Management Board and the Supervisory Board, and in particular the power to issue or buy back shares, are set out in the Articles of association of the bank. Decisions to issue or buy back shares are taken by the Sole owner of the capital of the bank.

Separate corporate governance declaration (continued)

Management bodies

The management bodies of the bank are as follows:

- Management Board
- Supervisory Board.

ProCredit Bank has a two-tier management system.

Management Board

The bank is managed by Management Board which operates under the control of Supervisory Board. The Management Board comprises four members who are elected by the Supervisory Board for a term of three years. The relationships between the bank and each member of the Management Board are arranged by a management contract. The Management Board, upon the prior approval of the Supervisory Board, assigns to two or more of its members (Executive Directors) the day-to-day management and representation of the bank. The Executive Directors may authorise third parties to perform specific actions. A person who is a member of the Supervisory Board of the bank may not be a member of the Management Board. The Management Board has the following competencies:

1. arranges for the preparation of the annual financial statement and the report on the activity of the bank;
2. prepares the convening of the session of the Sole owner of the capital and prepare a proposal for the taking of decisions by the Sole owner of the capital;
3. prepares the periodic reports to the Supervisory Board;
4. enacts rules for the organisation of its activity and takes decisions regarding amendments to such rules (any decision under this point requires the prior consent of the Supervisory Board);
5. adopts an annual budget and an annual business plan relating to the activity of the bank (any decision under this point requires the prior consent of the Supervisory Board);
6. determines the structure and positions in the bank (any decision under this point requires the prior consent of the Supervisory Board);
7. decides on other issues, raised by the Chairperson or by another member of the Management Board;
8. makes decisions for opening and closing of branches and representations of the bank (any decision under this point requires the prior consent of the Supervisory Board);
9. takes decisions for the transfer or supplying for use of the whole commercial enterprise (any decision under this point requires the prior consent of the Supervisory Board);
10. makes decisions for disposing of assets whose total value for the current year exceeds half of the value of the bank's assets according to the latest audited annual financial statements (any decision under this point requires the prior consent of the Supervisory Board);
11. makes decisions for taking liabilities or providing collateral to one person or related persons, whose amount for the current year exceeds half of the value of the bank's assets according to the latest audited annual financial statements (any decision under this point requires the prior consent of the Supervisory Board);
12. approves the internal normative acts of the bank;
13. take decisions for the granting of credits in the cases of Article 45 of the Law on Credit Institutions;
14. takes decisions that lead to the formation of big exposures;
15. determines the business activity of the bank in accordance with the main policy guidelines adopted by the Sole owner of the capital and manages the daily operational activity of the bank in accordance therewith;
16. prepares proposals to the Sole owner of the capital for amendments to the By-laws or the main lines of the activity of the bank;
17. appoints and dismisses the officers of the bank and determines their remuneration;
18. decides on any other matter with respect to which, pursuant to the law or the by-laws, the Sole owner of the capital and the Supervisory Board do not have exclusive power to decide, and performs all other functions, entrusted to it by the Sole owner of the capital or the Supervisory Board.

Separate corporate governance declaration (continued)

Management bodies (continued)

The Management Board is convened at meetings at the request of any of its members or of the members of the Supervisory Board.

The Management Board takes its decisions by a simple majority of the members present and represented, except in the following cases: the decisions set out in points 8 to 11 and 13 above, as well as the decisions set out in point 14 in cases where the exposure exceeds 15 per cent of the bank's equity shall be taken unanimously by all members of the Management Board.

The decisions of the Management Board concerning the conclusion of transactions whose value exceeds 10% of the registered capital of the bank also require the prior consent of the Supervisory Board.

The Management Board reports to the Supervisory Board on its activities at least once every 3 months.

Supervisory Board
The Supervisory Board consists of five members, each with a term of three years. The relations between the bank and each member of the Supervisory Board are regulated by a contract. The members of the Supervisory Board are selected and dismissed by the Sole owner of the capital. The Supervisory Board elects a chairperson and a vice chairperson from among its members. The Supervisory Board does not participate in the management of the bank. It represents the bank only in its relationship with the Management Board. The Supervisory Board may, at any time, require that the Management Board submits information or a report on any matter concerning the bank. The Supervisory Board may also carry out any necessary investigations in performance of its duties, its members can have access to all the necessary information and documents, and it may use the services of experts.

Some decisions of the Management Board require the prior consent of the Supervisory Board. This is indicated in the section regarding the competences of the Management Board. The Supervisory Board examines the annual separate financial statements, the separate annual activity report of the bank and the proposal on the distribution of earnings and, after approving them, adopts a decision to convene a regular meeting of the Sole owner of the capital.

The Supervisory Board is required to hold meetings at least once every three (3) months. Members of the Management Board can participate in these meetings in an advisory capacity. The Supervisory Board makes decisions by a simple majority of the members represented at the meeting.

Avoiding conflict of interest
The procedures for avoiding and detecting conflicts of interest in relation to the members of the management bodies of ProCredit Bank are laid down in the Articles of association of the bank. The members of the Management Board and the Supervisory Board are obliged to put the interests of the bank and its clients above their own. They are required to declare and/or disclose information about their participation in commercial companies, as well as about any material commercial, financial or other business interest that they or their family members have in the entering into any commercial transaction with the bank.

Separate corporate governance declaration (continued)

Management bodies (continued)

Audit and internal control
The overall internal control of the bank is carried out by the Supervisory Board and the Management Board. The Supervisory Board controls the activities of the Management Board. The Management Board controls the activities of the individual structural units. The bank's activities are carried out on the basis of internal rules and procedures, as well as of the applicable legislation.

ProCredit Bank ensures functional independence between risk-taking departments and departments that perform risk assessment. According to the structure of the bank, the business processes are segregated by the units that assess the level of risk up to the level of members of the Management Board. In addition, the level of risk and the risk management decisions are assessed in the committees responsible for managing and assessing the individual types of risks; this involves objective control and monitoring of the bank's exposure to each risk.

Internal Audit Department operates in the bank and reports directly to the Sole owner of the capital (ProCredit Holding). Internal audit inspects all aspects of the bank's operations by performing process checks as well as checks for compliance of the activities performed with the statutory instruments, the articles of association and the internal regulations of the bank. The head of the Internal Audit Department informs the Management Board of the bank and the members of the Audit Committee of the bank of the results of the audits performed. At least three times a year, meetings of the Audit Committee are held at which the Internal Audit Department reports on its activity. The Audit Committee was established at the beginning of 2009 and its members are independent of the bank's Management Board.

The specialised audit firms that perform independent financial audit of the bank's financial statements are approved by the Sole owner of the capital following the submission of a reasoned request and as a result of a tender organised by the Management Board. The Audit Committee supervises internal audit activities and oversees the overall relationship with the external auditor, including the nature of non-audit services provided by specialised audit firms.

Main features of the internal control system and of the risk management system in connection with the financial reporting process

Control environment
The institution's business model and ethical values are a prerequisite for the existence of an adequate internal control environment within the bank. The business model has a clear focus on providing comprehensive banking services to small and medium-sized enterprises and private individuals through the provision of high-quality services. The focus on business clients with a clear vision and sustainable development means that ProCredit Bank builds with such clients long-term relationships based on understanding their needs and offering appropriate solutions while ensuring that there is no over-indebtedness.

As stated in the Code of Conduct of the ProCredit Group, the development concept and the approach to clients is linked with a great responsibility to the society in which the bank operates. Self-imposed ethical principles are also applied. These principles can only exist if they are effectively communicated, understood and accepted by all employees, and this is reflected in the careful selection and development of the bank's employees.

Separate corporate governance declaration (continued)

Main features of the internal control system and of the risk management system in connection with the financial reporting process (continued)

Risk management
ProCredit Bank understands that risk taking is an integral part of its business. Therefore, there are mechanisms in place to identify the various risks and assess their potential impact on the financial position and the achievement of the bank's business objectives. The awareness of both management and employees of the risks, the inherent conservative approach to risk management and the consistent implementation of diversification are an integral part of the business and risk strategy of the institution. In addition, the basic principles of the risk strategy (focus on core business; high level of transparency, simplicity and diversification; careful selection and intensive training of staff) contribute significantly to the effective management of the risks to which the bank is exposed.

Control activities
The control activities within the risk management strategy are documented in specially approved group policies, group standards and other documents that cover all material risks to which the bank is exposed and that support the carrying out the various operations in a secure manner, and the transactions are reflected in accordance with the requirements set out in the manual. Control activities are implemented at all levels and in all processes within the institution based on the four-eye and the segregation of duties principles. The basic organisational principle is the segregation, up to the level of the Management Board, of risk and business units, thus ensuring functional independence between the business departments that take the risk and the departments responsible for risk assessment.

Information and communication flows
Effective communication channels are in place to ensure the exchange of information within the horizontal and vertical organisational structure of the institution. Mechanisms have also been put in place to receive and share information from external sources (such as regulators, shareholders and clients), as well as for subsequent communication with these persons. The Management Board receives regular (daily, monthly and quarterly) reports on risk management. If new risk events, failure to comply with approved internal limits and increased likelihood of loss are identified, mechanisms for escalation and extraordinary reporting are applied.

Monitoring
Mechanisms for ongoing monitoring of the various activities as well as of the internal control systems have been developed and put in place in the bank. Monitoring is carried out both by the management and by the relevant responsible employees. The Internal Audit Department also conducts an independent evaluation of internal control systems in accordance with a plan approved by the Sole owner of the capital. Gaps identified in the internal control system are escalated and can be reported to the Management Board, the Supervisory Board or the Audit Committee.

Bodies responsible for preventive and ongoing risk management. Existing committees in the structure of the bank
An adequate risk identification, management and control system has been established in the bank. The committees responsible for managing the individual types of risks are at the core of this system and their main function is to create and maintain an adequate control environment based on the principles and mechanisms for identifying, defining, assessing, monitoring and controlling/mitigation of the individual types of risks. These committees are the main bodies that make corrective or preventative decisions aimed at minimising exposure to particular types of risk. The work of the committees is assisted by the Risk Management Department and the Management Information System Department that prepare risk indicators and provide analyses of relevant indicators and additional analyses to support management decisions in the area of risk control and management. The decisions made by the individual committees are approved by the Management Board.

Separate corporate governance declaration (continued)

Bodies responsible for preventive and ongoing risk management. Existing committees in the structure of the bank (continued)

The main committees that monitor, analyse and control the different types of risk include representatives of both the risk management and the business lines, as well as of the lines that perform administrative functions. This allows both a synergic effect of presenting different viewpoints on issues related to risk management and covering the different areas of activity and their impact on risk exposures. The main committees are as follows:

Assets and Liabilities Committee
The objective of the Assets and Liabilities Committee (ALCO) at ProCredit Bank is to identify, assess, discuss and manage financial risks which include liquidity risk; market risk (including currency and interest rate risk); counterparty risk; capital adequacy. ALCO monitors the status and impact of the asset/liability management strategies implemented and develops new ones.

The committee comprises the members of the Management Board, as well as senior expert from Management Information System Department and head of General Risk Unit at Risk Management Department. Regular meetings of ALCO are held at least once a month. The committee is elected and managed by the Management Board.

General Risk Assessment Committee
Regular meetings of the committee are held once every three months in order to analyse the overall risk exposure of the bank (excluding operational risk) and to discuss and adopt strategic issues. The Risk Management Department prepares a quarterly report on the overall risk for the committee meetings; said report includes the main and secondary indicators of the types of risk, as well as their analysis.

The committee comprises the members of the Management Board, heads of Management Information System Department, Risk Management Department, General Risk Unit and Business Department – Small and Medium Clients. The committee is elected and managed by the Management Board.

Operational Risk Management Committee
The Operational Risk Management Committee is a body within the structure of the bank that is elected and managed by the Management Board. The committee provides an opportunity for adequate management of operational risks and for taking decisions in this regard. The following two subcommittees are also integrated into the Operational Risk Management Committee: Compliance Committee and Committee on Safety at Work.

The committee comprises the members of the Management Board in charge of Risk and Finance, as well as the heads of Business Department – Small and Medium Clients, Business Department – Private Individuals, Risk Management Department, General Risk Unit, Accounting Department, Information Technologies Department, Credit Administration Department and Expert Compliance. Regular meetings of the committee are held once every three months to discuss the operational risk report and to review events that have led to a loss for the bank as a result of operational events.

Credit Risk Management Committee
The Credit Risk Management Committee is a body within the structure of the bank that is elected and managed by the Management Board. The functions of the committee are related to the monitoring, analysis and discussion of issues and topics related to credit risk and its manifestation in the bank. The committee is also involved in the process of determining the cost of impairment losses on individually measured credit exposures.

Separate corporate governance declaration (continued)

Bodies responsible for preventive and ongoing risk management. Existing committees in the structure of the bank (continued)

The committee comprises the member of the Management Board in charge of Risk, as well as the heads of Risk Management Department, Credit Risk Department, General Risk Unit and Problematic Receivables Unit. Regular meetings of the committee are held at least once every three months in order to assess the impact of the relevant factors related to credit risk management.

Credit Committee on Restructuring
The Credit Committee on Restructuring monitors and assesses the bank's risk exposures by deciding on their restructuring and classification. Restructuring occurs when credit exposure conditions change as a result of the conclusion of an agreement between the bank and the customer that changes the repayment terms of the loan due to an increased risk of default on the exposure related to the borrower. The members of the Credit Committee on Restructuring are employees from Problematic Receivables Unit of the bank's Risk Management Department, and meetings are held every week or as necessary.

Court Receivables Committee
The purpose of the Court Receivables Committee is to set, discuss and decide on the strategy for recovery of court claims with a value of more than EUR 100,000, to set deadlines and designate officials responsible for the actions to be taken, and to monitor the implementation of the actions. The members of the committee are determined by the Management Board. The committee comprises member of the Management Board and the head of the Problematic Receivables Unit as well as Experts from Problematic Receivables Unit and Legal Unit. Meetings of the committee are held at least once a month.

Environment Committee
This committee discusses and decides on issues related to environmental standards and the overall policy and strategy of ProCredit Bank regarding the environmental impact management system. The committee comprises the members of the Management Board and the heads of Environmental Department, Business Department – Small and Medium Clients, Credit Risk Department and Administration Department. The meetings are held at least once every quarter.

Crisis Management Committee
The task of the Crisis Management Committee is to define and manage the measures to be taken by the bank when dealing with a crisis arising from a materialised threat. It has a permanent composition and comprises the members of the Management Board and the heads of core business processes. A member of the Management Board or another person designated by the Management Board is a chairperson of the committee. The Crisis Management Committee is authorised to provide and allocate the resources (human and material) needed to deal with the crisis, as well as to control and reporting on the costs. The Crisis Management Committee manages and dynamically allocates responsibilities to the Failure Assessment Team, the IT Crisis Management Committee and the business continuity coordinators across departments and offices.

Human Resources Committee
This committee monitors changes in the labour market situation in the country, the pay levels inside and outside the bank, reviews salaries and decides on topics affecting current or potential employees of the bank. It comprises the Chairperson of the Supervisory Board, the members of the Management Board and a branch manager. The meetings are held quarterly.

Committee for the selection of candidates for members of the Management Board
The committee meets as necessary. It consists of the Chairperson of the Supervisory Board and another member of the Supervisory Board.

Separate corporate governance declaration (continued)

Compliance Committee
The committee reviews the regular changes that affect the activities of the bank and ensures regulatory compliance with them. The committee also discusses the effect of implementing legislative changes on the bank's policies and procedures. The committee assesses the risks for the bank of non-compliance with the regulatory framework and proposes actions to minimize them. It is integrated into the Operational Risk Management Committee.

Working Conditions Safety Committee
The committee assesses the safety of working conditions in the bank, gives recommendations for their optimization and presents analyses related to these topics. Incidents related to occupational safety, if any, shall also be submitted to the committee. It is integrated in the Operational Risk Management Committee.

Commission for Control and Prevention of Money Laundering and Terrorist Financing
The commission is an internal banking body with the main functions to examine the information from received signals about suspicious operations and customers, to submit cases to Financial Intelligence Directorate of the State Agency for National Security and to discuss the implementation of measures against money laundering and financing of terrorism, if necessary. The committee comprises the heads of Business Department – Small and Medium Clients, Business Department – Private Individuals, Risk Management Department and Internal Audit Department. Meetings are initiated by the Anti-Money Laundering Unit and are considered properly held if at least half of the members of the Commission are present.

Diversity policy applied to administrative, management and supervisory bodies

The ProCredit Group appreciates diversity in terms of the personal qualities and experience of its employees. In this context, the process of selecting the members of the Management Board and the Supervisory Board aims at ensuring an adequate level of diversity in the management bodies. As a result, both bodies include individuals who have different profiles in terms of education, nationality, professional experience and age. Of the nine members of ProCredit Bank's management bodies, three are women.

The separate corporate governance declaration was approved by the Management Board and signed on its behalf by:

PROCREDIT BANK (BULGARIA) EAD • SOFIA •

Reni Peycheva
Executive Director and
Member of the Management Board
13 April 2023

Ivan Dachev
Executive Director and
Member of the Management Board