

RIETUMU BANKA AS

2019 Annual Report

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Report of Council and Board of Directors

Dear Shareholders, Customers and Business Partners,

The results of year 2019 reflect the strengthened growth trend of Rietumu Banka AS (the Bank). New customers continue to come to the Bank, and every month we open accounts for several dozens of Latvian companies, including both promising developing enterprises and leaders in manufacturing, real estate development, logistics and other fields of economy. All of this confirms the correctness of the measures and plans that our bank has consistently put into practice over the last one and a half years, according to the new conditions and requirements implemented in Latvian financial sector, taking into account the position of regulatory bodies and international partners.

We reached a number of important goals defined in the updated bank strategy that had been previously developed. By consistently focusing on providing services to Latvian and European business customers, we built good business relations with many successful enterprises of the region. As a result, the amount of Bank's assets and deposits increased. The Bank maintains its stability and the high quality of its loan portfolio.

Profitability

The Group's after-tax profit attributable to the equity holders of the Bank for the year 2019 was EUR 21 million (2018: 21 million). The Group generated an after-tax return on equity of 5.78% (2018: 4.92%) and an after-tax return on assets of 1.41% (2018: 1.37%).

The Group's operating income was EUR 73 million (2018: EUR 104 million). Net fee and commission income was EUR 12 million (2018: EUR 37 million). The Group's cost to income ratio was 54% for the year ended 31 December 2019 (2018: 47%). The cumulative result of the above is that the Group reached a pre-tax profit margin of 34%.

Assets

As at 31 December 2019 the Group's total assets were EUR 1,704 million. This represents a increase for 9.7% compared to 2018. The Group follows a conservative approach to asset allocation and about 52% of the Group's assets invested in liquidity management portfolios. About 7% of the liquidity management portfolio is invested in short term money market placement with large mainly European banks. The tenure of these placements is up to 7 days. The bond portfolio primarily consists of corporate investment grade securities.

Lending

As a result of the uncertain environment in the region the Bank has substantially scaled down its commercial lending in the CIS countries and currently has become more active in lending of medium-large scale corporates in the Baltics. In addition, the Group focussed on reducing concentration risks of large lending projects. This resulted in the lending portfolio being diversified over a large group of medium sized loans rather than the portfolio being concentrated in a smaller group of larger loans. Volume of loan portfolio has stabilized in 2019. Loans and receivables to customers reached EUR 585 million showing only slight decrease compared to the balance of 2018 of EUR 618 million. This year the Bank plans moderate portfolio growth. The effective average interest rate for 2019 was 3.88%.

The Bank follows a very conservative lending policy while offering innovative and individually tailored products that suit the requirements of each individual customer the best. During 2019 the Group continued to focus on both commercial and residential real estate projects, production, agriculture, trade, loan portfolio finance businesses.

Group Companies

The major non-banking companies of the Group include leasing and consumer finance companies, repossessed real estate and other repossessed collateral maintenance companies and asset management and financial companies. It is the Bank's strategy as much as possible to fully integrate its subsidiaries into the Bank's management and control systems. The activities of Group companies are financed by the Bank via capital investments and loans. In most cases the Bank owns 100% of the shares of its subsidiaries.

The Group fully owns an asset management company called Rietumu Asset Management that provides asset management services to the Bank's customers. The asset management company provides individual portfolios for customers as well as investment into Latvian registered funds.

The Group's Belorussian leasing business focuses on industrial equipment leasing which contributed to the Group's profit before income tax in the amount of EUR 1,3 million for the year ended 31 December 2019. The Bank partly owns and finances a consumer lending company named InCredit Group SIA which is registered and operates in Latvia. As of 31 December 2019, the net leasing portfolio of InCredit Group SIA was EUR 53 million and it contributed to the net profit before tax of the Group in the amount of EUR 4 million.

RB Investments group, owns most of the significant real estate that the Bank repossessed as well as other assets that the Bank took over on defaulted loans. Most of the repossessed assets are located in Riga and the Riga region. RB Investments Group is renting out a portion of these assets and plans to sell most of its portfolio of assets in the coming years.

Funding, Equity and Expand Capital Base

The Group's current accounts and deposits due to customers in amount of EUR 1,320 million increased by 29% compared to 2018. Current accounts represented EUR 703 million or 53% of total current accounts and customer deposits. Term deposits amounted to EUR 617 million as at 31 December 2019 including EUR 65 million of subordinated deposits. The Bank managed to attract deposits from a new funding source, on-line platforms for individuals from EU. This new funding source has strengthened Bank's resource base in medium term. The average remaining tenor of term deposits as at 31 December 2019 was 1.4 years with the average effective interest rate of 1.41%. The average effective interest rate for subordinated deposits in 2019 was 5.18%.

Group total shareholders' equity reached EUR 324 million as of 31 December 2019. Group Tier I and total capital adequacy ratios were 20.34% (2018: 27.46% %) and 22.48% (2018: 36.01%) respectively.

2020 and Beyond

The results that the Bank and the Group has reached provide an excellent basis for the further development of the Bank and the Group. They reflect the appropriateness of the chosen course and the presence of key conditions for its implementation: financial and intellectual resources, a solid capital base and modern technologies.

We owe our success to our customers and business partners and the trust that they have placed in us. We would like to thank our customers and business partners for their support and we are looking forward to continue developing the Bank and the Group successfully in 2020 and beyond.

Sustainability Report prepared by the management is set out in a separate statement and is available on Bank's website <http://www.rietumu.lv/>.

Financial results of the Group

	2019	2018	2017	2016
At year end (EUR'000)				
Total assets	1,703,706	1,552,981	3,009,558	3,473,590
Loans and receivables due from customers	585,291	617,899	832,340	1,044,920
Current accounts and deposits due to customers	1,319,833	1,019,696	2,340,512	2,742,726
Total shareholder's equity	324,443	471,461	478,755	493,874
For the year (EUR'000)				
Net profit before tax	24,510	24,848	40,678	88,748
Net profit after tax	23,000	23,461	33,494	82,337
Operating income	72,822	104,458	136,611	180,981
Ratios				
Earnings per share (EUR) – basic and diluted				
After tax	0.19	0.17	0.28	0.68
Return on equity				
Before tax	6.16%	5.21%	8.36%	18.67%
After tax	5.78%	4.92%	6.89%	17.32%
Return on assets				
Before tax	1.51%	1.45%	1.25%	2.44%
After tax	1.41%	1.37%	1.03%	2.27%
Capital adequacy ratio	22.48%	36.01%	24.08%	22.36%
Profit margin	33.66%	23.79%	29.78%	49.04%
Loan portfolio to total assets ratio	34.35%	39.79%	27.66%	30.08%
Number of employees	701	856	1,070	1,078

Financial results of the Bank

	2019	2018	2017	2016
At year end (EUR'000)				
Total assets	1,718,724	1,542,405	2,998,620	3,465,604
Loans and receivables due from customers	638,523	695,343	916,987	1,116,873
Current accounts and deposits due to customers	1,332,529	1,033,539	2,359,214	2,767,739
Total shareholder's equity	307,770	457,510	459,614	471,546
For the year (EUR'000)				
Net profit before tax	19,105	22,480	41,008	86,509
Net profit after tax	18,431	21,483	33,034	80,300
Operating income	53,144	88,027	122,444	170,212
Ratios				
Earnings per share (EUR) - basic and diluted				
After tax	0.17	0.18	0.26	0.73
Before tax	0.17	0.19	0.33	0.79
Return on equity				
Before tax	4.93%	4.83%	8.81%	19.13%
After tax	4.76%	4.62%	7.02%	17.76%
Return on assets				
Before tax	1.14%	1.19%	1.27%	2.39%
After tax	1.10%	1.14%	1.03%	2.21%
Capital adequacy ratio	21.96%	36.62%	24.36%	22.61%
Profit margin	35.95%	25.54%	33.49%	50.82%
Loan portfolio to total assets ratio	37.15%	45.08%	30.58%	32.23%
Number of employees	429	567	765	782

STATEMENTS OF MANAGEMENT RESPONSIBILITY

The Management of Rietumu Banka AS is responsible for the preparation of the consolidated financial statements of the Bank and its subsidiaries (the Group) as well as for the preparation of the separate financial statements of the Bank.

The separate and consolidated financial statements on pages 15 to 117 are prepared in accordance with source documents and present fairly the financial position of the Bank and the Group as of 31 December 2019 and the results of their operations and cash flows for the year ended 31 December 2019.

The separate and consolidated financial statements are prepared in accordance with International Financial Reporting Standards as adopted by the European Union on a going concern basis. Appropriate accounting policies have been applied on a consistent basis. In the preparation of the financial statements the Management has made prudent and reasonable judgements and estimates.

The Management of Rietumu Banka AS is responsible for the maintenance of proper accounting records, the safeguarding of the Bank's and the Group's assets and the prevention and detection of fraud and other irregularities in the Bank and in the Group. The Management is also responsible for operating the Bank in compliance with the Law on Credit Institutions, regulations of the Finance and Capital Markets Commission and other legislation of the Republic of Latvia.

On behalf of the Management of Rietumu Banka AS:



Chairman of the Executive Board
Rolf Paul Fuls

27 March 2020



Deputy Chairman of the Executive Board
Ruslans Stecjuks

During the year and as of the date of the signing of the financial statements:

The Council of Rietumu Banka

1 January 2019 – 31 December 2019

<i>Name</i>	<i>Position</i>	<i>Date of appointment and current term</i>
Leonids Esterkins	Chairman of the Council	25/09/97 (14/05/18-14/05/21)
Arkadijs Suharenko	Deputy Chairman of the Council	25/09/97 (14/05/18-14/05/21)
Brendan Thomas Murphy	Deputy Chairman of the Council	07/09/05 (14/05/18-14/05/21)
Dermot Fachtna Desmond	Member of the Council	07/09/05 (14/05/18-14/05/21)
Valentins Blugers	Member of the Council	25/03/11 (14/05/18-14/05/21)

The Executive Board

1 January 2019 – 31 December 2019

<i>Name</i>	<i>Position</i>	<i>Date of appointment and current term</i>
Rolf Paul Fuls	Chairman of the Executive Board	23/09/19-23/09/22
Ruslans Stecjuks	Member of the Executive Board, Deputy Chairman	23/09/19-23/09/22
Ilja Suharenko	Member of the Executive Board, Deputy Chairman	23/09/19-23/09/22
Jelena Buraja	Member of the Executive Board	23/09/19-23/09/22

INDEPENDENT AUDITOR'S REPORT

To the shareholders of AS "Rietumu Banka"

Report on the Audit of the Bank's Separate and the Group's Consolidated Financial Statements

Our Opinion on the Separate and Consolidated Financial Statements

We have audited the accompanying separate financial statements of AS "Rietumu Banka" ("the Bank") and accompanying consolidated financial statements of the Bank and its subsidiaries ("the Group") set out on pages 15 to 117 of the accompanying separate and consolidated Annual Report, which comprise:

- the separate and consolidated statement of financial position as at 31 December 2019;
- the separate and consolidated statement of profit or loss and other comprehensive income for the year then ended;
- the separate and consolidated statement of changes in equity for the year then ended;
- the separate and consolidated statement of cash flows for the year then ended;
- notes to the separate and consolidated financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying separate and consolidated financial statements give a true and fair view of the separate and consolidated financial position of the Bank and the Group as at 31 December 2019, and of its separate and consolidated financial performance and its cash flows for the year then ended in accordance with the International Financial Reporting Standards as adopted by the European Union.

Basis for Opinion

In accordance with the Law on Audit Services of the Republic of Latvia we conducted our audit in accordance with International Standards on Auditing adopted in the Republic of Latvia (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Separate and Consolidated Financial Statements* section of our report.

We are independent of the Bank and the Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) and independence requirements included in the Law on Audit Services of the Republic of Latvia that are relevant to our audit of the separate and consolidated financial statements in the Republic of Latvia. We have also fulfilled our other professional ethics responsibilities and objectivity requirements in accordance with the IESBA Code and Law on Audit Services of the Republic of Latvia.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Emphasis of Matter

On 6 July 2017 a French Court ruled in its first-instance judgment that the Bank was guilty of aggravated money laundering and was ordered to pay a criminal fine of EUR 80,000 thousand, and damages, jointly and severally with other defendants, of EUR 10,113 thousand to the Republic of France. The court ruling was appealed both by the Bank and by the French prosecutors. The next hearings are expected to take place on 18, 19 and 20 May 2020. The Bank and the Group believe that the amount of the provision (EUR 34,000 thousands) recognized in these separate and consolidated financial statements represent their best estimate of the expenditure to be ultimately required to settle the obligation, however, the Bank and the Group also recognize that, due to the inherent uncertainty associated with the proceedings is of such nature, that the actual expenditure required to settle the claim could be lower or substantially higher than the amount of provisions made.

Our opinion is not modified in respect of this matter.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the separate and consolidated financial statements of the current period. These matters were addressed in the context of our audit of the separate and consolidated 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 matters described below to be the key audit matters to be communicated in our report:

Impairment of the loans to customers (the Bank)

Key audit matter	33% of gross amount of loans and receivables due from customers as at 31 December 2019 are classified as credit-impaired (more details are provided in the note 19.2 (b) of the separate and consolidated financial statements), and 60% of the net amount of loans to customers as at 31 December 2019 are due from customers based and operating outside Latvia (more details on geographical analysis of the loan portfolio are provided in the note 19.2 (d) of the separate and consolidated financial statements). We believe that these factors indicate presence of an increased audit risk related to the assessment of potential impairment of the value of loans and therefore considered this as a key audit matter.
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Our audit response	We assessed whether the Bank's and the Group's accounting policies in relation to the impairment of loans to customers are in compliance with the IFRS.
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We made detailed review of loan files covering 76% of the net amount of outstanding loans to customers as at 31 December 2019 (90% of loans classified as credit-impaired). As part of the review we assessed the customer financial situation and capacity to support sustainable debt service payments or, if this was not the case, management's exit plans and activities, as well as available sources of loan repayment.

As in many cases the key source of loan recovery was realisation of collateral associated with specific loans, primarily - real estate - we involved our internal valuation specialists who did detailed review of assumptions and information sources used in valuation reports provided by independent valuation specialists engaged by the Bank or its debtors, including independent checks on market prices for comparable properties.

Valuation of investment properties (the Group)

Key audit matter The balance sheet value of the Group's investment property portfolio as at 31 December 2019 is EUR 90,059 thousand (more details on investment properties are provided in the note 26 while information on the measurement principles are provided in the note 3 (d)(ii) of the separate and consolidated financial statements). Significant part of these represent properties acquired through the foreclosure or restructuring of loans issued by the Bank. These properties have limited liquidity and represent significant challenges to determine their fair value at the reporting date. Considering the size of investment property portfolio and its potential impact on the financial results of the Group we defined this area as a key audit matter.

Our audit response We involved our internal valuation experts to assess, on a sample basis (covering 60% of the total balance), independent valuation reports commissioned by the Bank or the Group's entities including matters such as selection of the valuation methods and key assumptions underlying value calculations - comparable market transactions, cash flow projections, discount rates, capitalisation rates. For a number of cases we did sensitivity analysis for certain assumptions within the valuation to assess the effect of their potential changes on the investment property fair values.

We assessed the adequacy of the Group's disclosures related to the assumptions and significant judgments used at estimating fair values of investment properties.

Reporting on Other Information

The Bank's and the Group's management is responsible for the other information. The other information comprises:

- the Report of the Council and the Board of Directors, as set out on pages 3 to 6 of the accompanying Annual Report,
- the Statement on Management Responsibility, as set out on page 7 of the accompanying Annual Report,
- the composition of the Supervisory Council and the Management Board, as set out on page 8 of the accompanying Annual Report.

Our opinion on the separate and consolidated financial statements does not cover the other information included in the Annual Report, and we do not express any form of assurance

conclusion thereon, except as described in the *Other reporting responsibilities in accordance with the legislation of the Republic of Latvia* related to other information section of our report.

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

If, based on the work we have performed and in light of the knowledge and understanding of the entity and its environment, obtained in the course of our audit, 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.

Other reporting responsibilities in accordance with the legislation of the Republic of Latvia related to other information

In addition, in accordance with the Law on Audit Services of the Republic of Latvia with respect to the Management Report, our responsibility is to consider whether the Management Report is prepared in accordance with the requirements of the Financial and Capital Market Commission of the Republic of Latvia - regulation No 46 Regulations on the Preparation of the Annual Reports and Annual Consolidated Accounts for Banks, Investment Brokerage Firms and Investment Management Companies ("Regulation No 46").

Based solely on the work required to be undertaken in the course of our audit, in our opinion:

- the information given in the Management Report for the financial year, for which the separate and consolidated financial statements are prepared, is consistent with the separate and consolidated financial statements; and
- the Management Report has been prepared in accordance with the requirements of the Regulation 46.

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

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

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

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

Auditor's Responsibilities for the Audit of the Separate and Consolidated Financial Statements

Our objectives are to obtain reasonable assurance about whether the separate and consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's 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 and consolidated financial statements.

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

- Identify and assess the risks of material misstatement of the separate and consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's and the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's and/or the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the separate and consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Bank and/or the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the separate and consolidated financial statements, including the disclosures, and whether the separate and consolidated financial statements represent the underlying transactions and events in a manner that achieves a 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 objectivity, and to communicate

with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

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

Other Reporting Responsibilities and Confirmations Required by the Legislation of the Republic of Latvia and the European Union when Providing Audit Services to Public Interest Entities

We were appointed by the shareholders' meeting on 8 May 2019 to audit the separate and consolidated financial statements of AS Rietumu Banka for the year ended 31 December 2019. Our total uninterrupted period of engagement is two years, covering the periods ending 31 December 2018 to 31 December 2019.

We confirm that:

- our audit opinion is consistent with the additional report presented to the Audit Committee of the Bank and the Group;
- as referred to in the paragraph 37.6 of the Law on Audit Services of the Republic of Latvia we have not provided to the Bank and the Group the prohibited non-audit services (NASs) referred to of EU Regulation (EU) No 537/2014. We also remained independent of the audited Bank and the Group in conducting the audit.

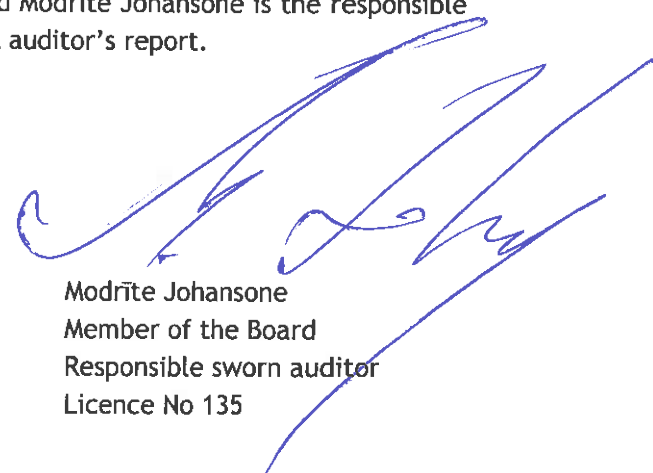
For the period to which our statutory audit relates, we have not provided any other services to the Bank and the Group in addition to the audit, which have not been disclosed in the separate and consolidated financial statements of the Bank and the Group.

Mārtiņš Zutis is the responsible engagement partner and Modrīte Johansone is the responsible sworn auditor on the audit resulting in this independent auditor's report.

"BDO ASSURANCE" SIA
Licence No 182


Mārtiņš Zutis
Director
on behalf of SIA "BDO ASSURANCE"

Riga, Latvia
27 March 2020


Modrīte Johansone
Member of the Board
Responsible sworn auditor
Licence No 135

**SEPARATE AND CONSOLIDATED STATEMENTS OF PROFIT OR LOSS AND OTHER
 COMPREHENSIVE INCOME**

For the year ended 31 December 2019

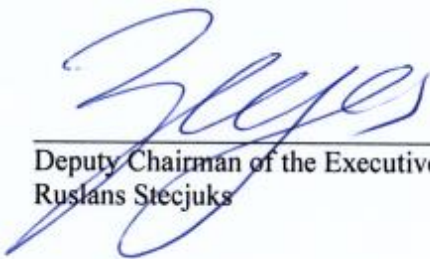
		2019	2019	2018	2018
		'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Note	Group	Bank	Group	Bank
Interest income	6	51,527	38,811	59,739	47,335
Interest expense	6	(17,879)	(17,324)	(15,255)	(13,651)
Net interest income		33,648	21,487	44,484	33,684
Fee and commission income	7	18,400	17,719	47,060	46,384
Fee and commission expense	8	(5,918)	(5,200)	(10,110)	(9,598)
Net fee and commission income		12,482	12,519	36,950	36,786
Net gain/(loss) on financial assets at fair value through profit or loss	9	611	675	940	803
Net foreign exchange gain	10	11,542	10,394	12,636	13,562
Net realised gain/(loss) on financial assets at fair value through other comprehensive income	11	1,562	1,562	(585)	(585)
Net realised gain on debt instruments at amortised cost		153	153	(1,090)	(1,090)
Share of income/(losses) of equity accounted investees (net of income tax)		(28)	-	20	-
Other income	12	12,852	6,354	11,103	4,867
Operating income		72,822	53,144	104,458	88,027
Impairment losses	13	(9,130)	(8,084)	(16,492)	(17,486)
Provisions charges	35	(31)	(16)	(13,912)	(13,931)
General and administrative expenses	14	(39,151)	(25,939)	(49,206)	(34,130)
Profit before income tax		24,510	19,105	24,848	22,480
Income tax expense	15	(1,510)	(674)	(1,387)	(997)
Profit for the period		23,000	18,431	23,461	21,483
Attributable to:					
Equity holders of the Bank		21,219		21,293	
Non-controlling interest		1,781		2,168	

The separate and consolidated statements of profit or loss and other comprehensive income are to be read in conjunction with the Notes to, and forming part of, the separate and consolidated financial statements set out on pages 24 to 117.



 Chairman of the Executive Board
 Rolf Paul Fuhs

27 March 2020





 Deputy Chairman of the Executive Board
 Ruslans Stecjuks

**SEPARATE AND CONSOLIDATED STATEMENTS OF PROFIT OR LOSS AND OTHER
 COMPREHENSIVE INCOME**

For the year ended 31 December 2019	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Profit for the period	23,000	18,431	23,461	21,483
Other comprehensive income				
<i>Items that are or may be reclassified to profit or loss</i>				
Foreign currency translation differences for foreign operations	4	-	(405)	-
Other reserves - net change	(66)	-	1	-
Financial assets at fair value through other comprehensive income – net change in fair value	5,824	5,824	(3,714)	(3,714)
Other comprehensive income for the period	5,762	5,824	(4,118)	(3,714)
Total comprehensive income for the period	28,762	24,255	19,343	17,769
Attributable to:				
Equity holders of the Group	26,981		17,175	
Non-controlling interest	1,781		2,168	

The separate and consolidated statements of profit or loss and other comprehensive income are to be read in conjunction with the Notes to, and forming part of, the separate and consolidated financial statements set out on pages 24 to 117.


 Chairman of the Executive Board
 Rolf Paul Fuls


 Deputy Chairman of the Executive Board
 Ruslans Stecjuks

27 March 2020

SEPARATE AND CONSOLIDATED STATEMENTS OF FINANCIAL POSITION


As at 31 December 2019	Note	31 Dec 2019 '000 EUR Group	31 Dec 2019 '000 EUR Bank	31 Dec 2018 '000 EUR Group	31 Dec 2018 '000 EUR Bank
Assets					
Cash and balances due from the Bank of Latvia	16	503,089	503,072	466,490	466,444
Loans and receivables due from banks	17	81,493	80,911	92,443	91,828
Financial assets at fair value through profit or loss	18	10,155	10,049	11,815	11,671
Financial assets at amortised cost	19				
Debt securities	19.1	60,536	60,536	35,537	35,537
Loans and receivables due from customers	19.2	585,291	638,523	617,899	695,343
Financial assets at fair value through other comprehensive income	20	290,490	290,490	159,405	159,405
Non-current assets held for sale		763	596	1,792	-
Investments in subsidiaries	21	-	29,466	-	32,809
Equity accounted investees	22	4	-	32	-
Property and equipment	23	38,424	34,654	42,872	8,386
Intangible assets	24	2,092	2,074	2,839	2,498
Investment property	26	90,059	35,114	84,373	9,343
Current tax asset		317	174	3,264	2,836
Deferred tax asset	32	107	-	173	-
Other assets	27	40,886	33,065	34,047	26,305
Total Assets		1,703,706	1,718,724	1,552,981	1,542,405

The separate and consolidated statements of financial position are to be read in conjunction with the Notes to, and forming part of, the separate and consolidated financial statements set out on pages 24 to 117.

SEPARATE AND CONSOLIDATED STATEMENTS OF FINANCIAL POSITION

As at 31 December 2019	Note	31 Dec 2019 '000 EUR Group	31 Dec 2019 '000 EUR Bank	31 Dec 2018 '000 EUR Group	31 Dec 2018 '000 EUR Bank
Liabilities and Shareholders' Equity					
Financial instruments at fair value through profit or loss	18	94	94	-	-
Deposits and balances due to banks	28	2,920	2,920	2,403	2,348
Current accounts and deposits due to customers	29	1,319,833	1,332,529	1,019,696	1,033,539
Issued debt securities	30	712	-	62	-
Provisions	36	34,105	34,154	34,076	34,138
Current tax liability		50	-	243	-
Deferred tax liability	32	99	-	46	-
Other liabilities and accruals	31	21,450	41,257	24,994	14,870
Total Liabilities		<u>1,379,263</u>	<u>1,410,954</u>	<u>1,081,520</u>	<u>1,084,895</u>
Share capital	33	168,916	168,916	168,916	168,916
Share premium	33	52,543	52,543	52,543	52,543
Revaluation reserve	33	1,890	-	1,914	-
Fair value reserve	33	3,578	3,578	(2,246)	(2,246)
Currency translation reserve		(3,559)	-	(3,563)	-
Other reserves	33	39	23	105	23
Retained earnings		96,898	82,710	249,647	238,274
Total Equity Attributable to Equity Holders of the Bank		<u>320,305</u>	<u>307,770</u>	<u>467,316</u>	<u>457,510</u>
Non-controlling Interest		<u>4,138</u>	<u>-</u>	<u>4,145</u>	<u>-</u>
Total Shareholders' Equity		<u>324,443</u>	<u>307,770</u>	<u>471,461</u>	<u>457,510</u>
Total Liabilities and Shareholders' Equity		<u>1,703,706</u>	<u>1,718,724</u>	<u>1,552,981</u>	<u>1,542,405</u>

The separate and consolidated statements of financial position are to be read in conjunction with the Notes to, and forming part of, the separate and consolidated financial statements set out on pages 24 to 117.



 Chairman of the Executive Board
 Rolf Paul Puls



 Deputy Chairman of the Executive Board
 Ruslans Stocjuks

27 March 2020

Rietumu Banka AS
Group Consolidated and Bank Separate Financial Statements
for the year ended 31 December 2019

SEPARATE AND CONSOLIDATED STATEMENTS OF CASH FLOWS		2019	2019	2018	2018
For the year ended 31 December 2019		'000	'000	'000	'000
	Note	EUR	EUR	EUR	EUR
		Group	Bank	Group	Bank
CASH FLOWS FROM OPERATING ACTIVITIES					
Profit before income tax		24,510	19,105	24,848	22,480
Amortisation and depreciation	23,24	2,629	2,851	2,889	1,327
(Gain)/loss from sale of investment property		(76)	(307)	(1,774)	(325)
Revaluation of investment property		(279)	341	3,359	314
Share of (income)/loss of equity accounted investees		28	-	(20)	-
Increase of provisions		29	16	13,912	13,931
Assets write off/(recovery of assets written off)		20	(355)	(313)	(313)
(Gain)/loss on disposal of property and equipment		3	(23)	(310)	-
(Gain)/loss on sale of subsidiaries		(2,527)	-	(504)	(96)
Impairment losses	13	9,130	8,084	16,492	17,486
Increase in cash and cash equivalents before changes in assets and liabilities, as a result of ordinary operations		33,467	29,712	58,579	54,804
(Increase)/decrease in financial assets at fair value through profit or loss		1,660	1,622	3,742	(11,226)
(Increase)/decrease in loans and receivables due from banks – term deposits		-	-	644	642
(Increase)/decrease in loans and receivables from customers		24,847	26,669	197,713	198,426
(Increase)/decrease in receivable under reverse repurchase agreements		-	-	40,825	40,825
(Increase)/decrease in financial assets at fair value through other comprehensive income		(125,756)	(125,756)	166,125	183,216
(Increase)/decrease in other assets		(7,632)	(7,451)	4,569	1,375
Increase/(decrease) in derivative liabilities		94	94	(30)	(30)
Increase/(decrease) in term deposits due to banks		-	-	994	(569)
Increase/(decrease) in current accounts and deposits due to customers		298,936	298,990	(1,320,816)	(1,325,675)
Decrease in amounts payable under repurchase agreements		-	-	(120,000)	(120,000)
(Increase)/decrease in non-current assets held for sale		1,625	-	(1,572)	-
Increase/(decrease) in other liabilities and accruals		(3,081)	(3,787)	2,942	2,452
Increase/(decrease) in cash and cash equivalents from operating activities before corporate income tax		224,160	220,093	(966,285)	(975,760)
Corporate income tax		1,281	1,988	(4,661)	(4,149)
Net cash and cash equivalents from operating activities		225,441	222,081	(970,946)	(979,909)
CASH FLOWS FROM INVESTING ACTIVITIES					
Purchase of property and equipment and intangible assets	23,24	(1,171)	(972)	(2,395)	(1,857)
Proceeds from sale of property, plant and equipment and other assets		28	28	268	142
Increase in equity investments in other entities and acquisition of subsidiaries		-	-	(3)	(1,918)
(Increase)/decrease in investment property	26	(1,858)	802	(2,343)	813
Proceeds from sale of subsidiary		3,061	3,342	49	-
(Increase)/decrease in debt securities at amortized cost		(25,073)	(25,073)	241,387	240,543
(Acquisition)/sale of non-controlling interest		(75)	-	(7,117)	-
Cash and cash equivalents used in / from investing activities		(25,088)	(21,873)	229,846	237,723

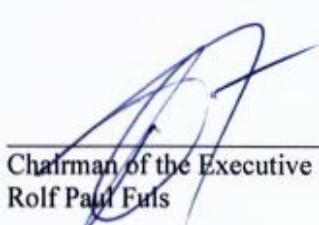
The separate and consolidated statements of cash flows are to be read in conjunction with the Notes to, and forming part of, the separate and consolidated financial statements set out on pages 24 to 117.

**SEPARATE AND CONSOLIDATED STATEMENTS
OF CASH FLOWS**

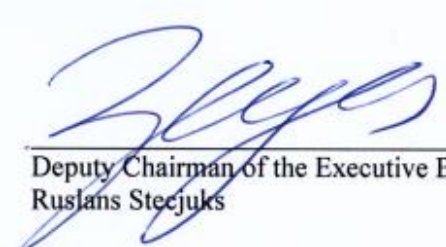
For the year ended 31 December 2019

	Note	2019 '000 EUR Group	2019 '000 EUR Bank	2018 '000 EUR Group	2018 '000 EUR Bank
CASH FLOWS FROM FINANCING ACTIVITIES					
Increase/(decrease) in other reserves		(66)	-	1	-
Issued debt securities	30	650	-	62	-
Dividends paid	33	(175,708)	(173,995)	(13,954)	(12,729)
Repayment of lease liability		(152)	(1,074)	-	-
Cash and cash equivalents used in/from financing activities		(175,276)	(175,069)	(13,891)	(12,729)
Net cash flow for the period		25,077	25,139	(754,991)	(754,915)
Cash and cash equivalents at the beginning of the year		556,585	555,924	1,311,576	1,310,839
Cash and cash equivalents at the end of the year	34	581,662	581,063	556,585	555,924

The separate and consolidated statements of cash flows are to be read in conjunction with the Notes to, and forming part of, the separate and consolidated financial statements set out on pages 24 to 117.



Chairman of the Executive Board
Rolf Paul Fuhs



Deputy Chairman of the Executive Board
Ruslans Stecjuks

27 March 2020

GROUP CONSOLIDATED STATEMENTS OF CHANGES IN THE SHAREHOLDERS' EQUITY

For the year ended 31 December 2018

Attributable to Equity Holders of the Bank

	Share capital	Share premium	Revaluation reserve	Fair value reserve	Foreign currency translation reserve	Other reserves	Retained earnings	Total	Non-controlling interest	Total Equity
	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR
Balance at 31 December 2017	168,916	52,543	1,381	3,409	(3,158)	104	245,294	468,489	10,266	478,755
Effect from changed accounting policy – IFRS 9	-	-	-	(1,941)	-	-	(4,238)	(6,179)	53	(6,126)
Restarted balance at 1 Jan 2018	168,916	52,543	1,381	1,468	(3,158)	104	241,056	462,310	10,319	472,629
<i>Transactions with shareholders recorded directly in equity</i>										
Dividends paid (Note 33)	-	-	-	-	-	-	(12,729)	(12,729)	-	(12,729)
<i>Transactions with non-controlling interest</i>										
Dividends paid to non-controlling interest shareholders	-	-	-	-	-	-	-	-	(1,225)	(1,225)
Transactions with third parties related to units of funds controlled by Group	-	-	-	-	-	-	-	-	32	32
Loss of control	-	-	-	-	-	-	-	-	(7,149)	(7,149)
<i>Comprehensive income</i>										
Profit for the current year	-	-	-	-	-	-	21,293	21,293	2,168	23,461
Other comprehensive income	-	-	-	(3,714)	(405)	1	-	(4,118)	-	(4,118)
<i>Other</i>										
Depreciation of revalued property	-	-	(27)	-	-	-	27	-	-	-
Revaluation of property and equipment	-	-	86	-	-	-	-	86	-	86
Transfer from Deferred tax	-	-	474	-	-	-	-	474	-	474
Balance at 31 December 2018	168,916	52,543	1,914	(2,246)	(3,563)	105	249,647	467,316	4,145	471,461


The Group consolidated statements of changes in the shareholders' equity are to be read in conjunction with the Notes to, and forming part of, the separate and consolidated financial statements set out on pages 24 to 117.

GROUP CONSOLIDATED STATEMENTS OF CHANGES IN THE SHAREHOLDERS' EQUITY

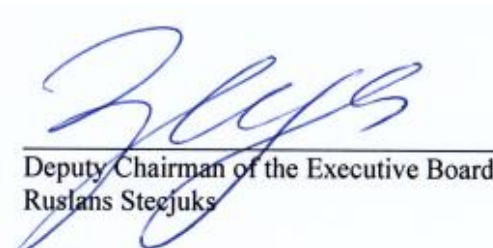
For the year ended 31 December 2019

	Attributable to Equity Holders of the Bank									
	Share capital	Share premium	Revaluation reserve	Fair value reserve	Foreign currency translation reserve	Other reserves	Retained earnings	Total	Non-controlling interest	Total Equity
	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR
Balance at 1 January 2019	168,916	52,543	1,914	(2,246)	(3,563)	105	249,647	467,316	4,145	471,461
<i>Transactions with shareholders recorded directly in equity</i>										
Dividends paid (Note 33)	-	-	-	-	-	-	(173,995)	(173,995)	-	(173,995)
<i>Transactions with non-controlling interest</i>										
Loss of control	-	-	-	-	-	-	-	-	(47)	(47)
Dividends paid to non-controlling interest shareholders	-	-	-	-	-	-	-	-	(1,713)	(1,713)
Transactions with third parties related to units of funds controlled by Group	-	-	-	-	-	-	-	-	(28)	(28)
<i>Comprehensive income</i>										
Profit for the current year	-	-	-	-	-	-	21,219	21,219	1,781	23,000
Other comprehensive income	-	-	-	5,824	4	(66)	-	5,762	-	5,762
<i>Other</i>										
Depreciation of revalued property	-	-	(27)	-	-	-	27	-	-	-
Revaluation of property and equipment	-	-	3	-	-	-	-	3	-	3
Balance at 31 December 2019	168,916	52,543	1,890	3,578	(3,559)	39	96,898	320,305	4,138	324,443

The Group consolidated statements of changes in the shareholders' equity are to be read in conjunction with the Notes to, and forming part of, the separate and consolidated financial statements set out on pages 24 to 117.


 Chairman of the Executive Board
 Rolf Paul Euls

27 March 2020


 Deputy Chairman of the Executive Board
 Ruslans Stegjuks

BANK'S SEPARATE STATEMENTS OF CHANGES IN SHAREHOLDERS' EQUITY
For the year ended 31 December 2019

	Share capital '000 EUR	Share premium '000 EUR	Fair value reserve '000 EUR	Other reserves '000 EUR	Retained earnings '000 EUR	Total equity '000 EUR
Balance at 31 December 2017	168,916	52,543	3,976	23	234,156	459,614
Effect from changed accounting policy – IFRS 9	-	-	(2,508)	-	(4,636)	(7,144)
Restated balance at 1 January 2018	168,916	52,543	1,468	23	229,520	452,470
<i>Transactions with shareholders recorded directly in equity</i>						
Dividends paid	-	-	-	-	(12,729)	(12,729)
<i>Comprehensive income</i>						
Profit for the period	-	-	-	-	21,483	21,483
Other comprehensive income	-	-	(3,714)	-	-	(3,714)
Balance at 31 December 2018	168,916	52,543	(2,246)	23	238,274	457,510
<i>Transactions with shareholders recorded directly in equity</i>						
Dividends paid	-	-	-	-	(173,995)	(173,995)
<i>Comprehensive income</i>						
Profit for the period	-	-	-	-	18,431	18,431
Other comprehensive income	-	-	5,824	-	-	5,824
Balance at 31 December 2019	168,916	52,543	3,578	23	82,710	307,770

The Bank's separate statements of changes in shareholders' equity are to be read in conjunction with the Notes to, and forming part of, the separate and consolidated financial statements set out on pages 24 to 117.



 Chairman of the Executive Board
 Rolf Paul Fuls



 Deputy Chairman of the Executive Board
 Ruslans Stecjuks

27 March 2020

1 Background

Principal activities

These financial statements include the separate financial statements of JSC “Rietumu Banka” (the “Bank”) and the consolidated financial statements of the Bank and its subsidiaries (together referred to as the “Group”).

The Bank was established in the Republic of Latvia as a Joint Stock Company and was granted its general banking license in 1992. The principal activities of the Bank are deposit taking and customer accounts maintenance, lending, issuing guarantees, cash and settlement operations and operations with securities and foreign exchange. The activities of the Bank are regulated by the Bank of Latvia and the Financial and Capital Market Commission (“FCMC”) of the Republic of Latvia. The registered address of the Bank’s head office is Vesetas street 7, Riga, Latvia. The average number of people employed by the Group during the year was 701 (2018: 856) and by the Bank 429 (2018: 567).

Principal subsidiaries of the Group (total assets in excess of EUR 5,000 thousand)

Name	Country of incorporation	Principal activities	Ownership %	
			31 Dec 2019	31 Dec 2018
RB Investments SIA	Vesetas Str.7, Riga, Latvia	Investments	100%	100%
Rietumu Leasing Ltd	Odoevskogo Str.117, 6 th floor, office 9, Minsk Belarus	Leasing company	100%	100%
Vesetas 7 SIA	Vesetas Str.7, Riga, Latvia	Real estate operating	100%	100%
Overseas Estates SIA	Vesetas Str.7, Riga, Latvia	Terminal	100%	100%
InCREDIT GROUP SIA	Krisjana Barona Str.130, Riga, Latvia	Customer lending	51%	51%
KI Nekustamie ipasumi SIA	Vesetas Str.7, Riga, Latvia	Real estate operating	100%	100%
KI 135 SIA	Vesetas Str.7, Riga, Latvia	Real estate operating	100%	100%
KI Invest Ltd	Nauchnij Str.19, Moscow, Russia	Real estate operating	100%	100%
U-10 SIA	Garozes Str. 25-1, Riga, Latvia	Real estate operating	67%	67%
Euro Textile Group SIA	Ganibu dambis 30, Riga, Latvia	Real estate operating	100%	100%

2 Basis of preparation

(a) Statements of compliance

The accompanying separate and consolidated financial statements have been prepared in accordance with International Financial Reporting Standards as adopted by the European Union (“EU IFRS”), and regulations of the Financial and Capital Market Commission of the Republic of Latvia (the ‘FCMC’) in force as at the reporting date.

The Board of Directors approved these separate and consolidated financial statements for issue on 27 March 2020.

(b) Basis of measurement

The separate and consolidated financial statements are prepared on the historical cost basis except for the following:

- financial assets at fair value through profit or loss are stated at fair value;
- financial assets at fair value through other comprehensive income are stated at fair value;
- non-current assets held for sale which are stated at lower their carrying amount and fair value less cost to sell;
- owner occupied buildings which are stated at revalued amounts being the fair value at the date of valuation less subsequent accumulated depreciation and any accumulated impairment losses;
- investment property and collateral assumed on non-performing loans is stated at fair value.

(c) Functional and Presentation Currency

These financial statements are presented in thousands of euro (EUR 000’s).

The functional currencies of the Bank and principal subsidiaries of the Bank are EUR, except for the principal subsidiaries listed below:

Rietumu Leasing Ltd	BYN (Belarussian Ruble)
KI Invest Ltd	RUB (Russian Rouble)

3 Significant accounting policies

The following significant accounting policies have been applied in the preparation of these separate and consolidated financial statements. The accounting policies have been consistently applied to all periods presented in these financial statements, except for the change in accounting policies described in Note 3(u).

(a) Foreign currency

(i) Foreign currency transactions

Transactions in foreign currencies are translated into the respective functional currencies of the Bank and its subsidiary companies at the spot exchange rates on the date of the transactions set by the European Central Bank.

Monetary assets and liabilities denominated in foreign currencies at the reporting date are retranslated into the functional currency at the spot exchange rate at that date. The foreign currency gain or loss on monetary items is the difference between amortised cost in the functional currency at the beginning of the period, adjusted for effective interest and payments during the period, and the amortised cost in foreign currency translated at the exchange rate at the end of the period. Non-monetary assets and liabilities denominated in foreign currencies that are measured at fair value are translated into the functional currency at the spot exchange rate at the date that the fair value was determined. Non-monetary assets and liabilities denominated in foreign currencies that are measured at historical cost are translated into the functional currency at the spot exchange rate at the date of transaction. Foreign currency differences arising on retranslation are recognised in profit or loss, except for differences arising on the translation of equity instruments at fair value through profit or loss, which are recognised in equity through other comprehensive income.

(ii) Foreign operations

The assets and liabilities of foreign operations, including goodwill and fair value adjustments arising on acquisition, are translated into the presentation currency of the Group at exchange rates set by the European Central Bank at the reporting date. The income and expenses of foreign operations are translated into the presentation currency of the Group at average exchange rate for the reporting period. Foreign currency differences are recognised in other comprehensive income and accumulated in a currency translation reserve, except that the translation difference is allocated to non-controlling interest. Upon disposal of subsidiary, the balance of currency translation reserve is reclassified to profit and loss.

(iii) Foreign exchange rates

	31 Dec 2019	Average 2019	31 Dec 2018	Average 2018
USD	1.1234	1.1195	1.145	1.1810
BYN	2.3637	2.3415	2.4734	2.4055
RUB	69.9563	72.4553	79.7153	74.0416

3 Significant accounting policies, continued

(b) Basis of consolidation

(i) Subsidiaries

Subsidiaries are those enterprises controlled by the Group. The Group controls an entity when it is exposed to, or has right to, variable returns from its involvement with the entity and has ability to affect those returns through its power over the entity. The financial statements of subsidiaries are included in the consolidated financial statements from the date that control effectively commences until the date that control effectively ceases.

(ii) Equity accounted investees

Associates are those enterprises in which the Group has significant influence, but not control, over the financial and operating policies. Significant influence is presumed to exist when the Group holds between 20 and 50% of the voting power of associated entity. The consolidated financial statements include the Group's share of the total recognised gains and losses of associates on an equity accounted basis, from the date that significant influence effectively commences until the date that significant influence effectively ceases. When the Group's share of losses exceeds the Group's interest in the associate, that interest is reduced to nil and recognition of further losses is discontinued except to the extent that the Group has incurred obligations in respect of the associate.

(iii) Transactions eliminated on consolidation

Intra-Group balances and transactions, and any unrealised gains arising from intra-Group transactions, are eliminated in preparing the consolidated financial statements. Unrealised gains arising from transactions with associates are eliminated to the extent of the Group's interest in the investee. Unrealised losses are eliminated in the same way as unrealised gains except that they are only eliminated to the extent that there is no evidence of impairment.

(iv) Non – controlling interest

The Group measures any non-controlling interest at its proportionate interest in the identifiable net assets of the acquiree.

(v) Investment in subsidiaries and associates in Bank's separate financial statements

Investments in subsidiaries and associates are measured in the Bank's separate financial statements at cost less impairment allowance, if any.

(vi) Asset management

The Bank and the Group hold assets which are purchased on behalf of investors (securities and other assets managed). The assets held on behalf of investors are accounted in off balance sheet and are not included in the separate and consolidated financial statements.

(c) Goodwill

Goodwill represents the excess of the cost of a business combination over the Bank's or the Group's interest in the fair value of the net identifiable assets and contingent liabilities of the acquiree at the date of acquisition.

The Bank and the Group measure goodwill as the fair value of the consideration transferred including the recognised amount of any non-controlling interest in the acquiree, less the net recognised amount (generally at fair value) of the identifiable assets acquired and liabilities assumed, all measured as of the acquisition date. Goodwill is included in intangible assets.

3 Significant accounting policies, continued

Goodwill is allocated to cash-generating units and is stated at cost less impairment losses, if any. Goodwill is tested for impairment annually or more frequently if events or changes in circumstances indicate that goodwill might be impaired and is measured at cost less any accumulated impairment losses. Cash generating units for goodwill impairment testing are: payment card business and investment properties management on subsidiary level. Gains and losses on the disposal of a business include the carrying amount of goodwill relating to the assets sold.

Negative goodwill (bargain purchase gain) arising on a business combination is recognised immediately in profit or loss.

(d) Fair value measurement principles

A number of the Bank's and Group's accounting policies and disclosures require the determination of fair value for both financial and non-financial assets and liabilities. Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal, or in its absence, the most advantageous market to which the Bank or the Group has access at that date. The fair value of a liability reflects its non-performance risk. When measuring the fair value of an asset or a liability, the Bank and the Group uses market observable data as far as possible. Fair values are categorised into different levels in a fair value hierarchy based on the inputs used in the valuation techniques as follows:

Level 1: quoted prices (unadjusted) in active markets for identical assets or liabilities.

Level 2: inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly (i.e. as prices) or indirectly (i.e. derived from prices).

Level 3: inputs for the asset or liability that are not based on observable market data (unobservable inputs).

If the inputs used to measure the fair value of an asset or a liability might be categorised in different levels of the fair value hierarchy, the fair value measurement is categorised in its entirety in the same level of the fair value hierarchy as the lowest level input that is significant to the entire measurement. The Bank and the Group recognizes transfers between levels of the fair value hierarchy at the end of the reporting period during which the change has occurred.

Fair values have been determined for measurement and/or disclosure purposes based on the following methods. In addition, when applicable, further information about the assumptions made in determining fair values is disclosed in the notes specific to that asset or liability.

(i) Financial assets and liabilities

When available, the Bank and the Group measure the fair value of a financial instrument using quoted prices in an active market for that financial instrument. A market is regarded as active if transactions with the asset or liability take place with sufficient frequency and volume to provide pricing information on an ongoing basis.

If a market for a financial instrument is not active, the Bank and the Group establish fair value using a valuation technique. Valuation techniques' assumptions are based on recent arm's length transactions between knowledgeable, willing parties (if available), reference to the current fair value of other instruments that are substantially the same, discounted cash flow analyses and option pricing models. The chosen valuation technique makes maximum use of market inputs, relies as little as possible on estimates specific to the relevant financial instrument, incorporates all factors that market participants would consider in setting the price, and is consistent with accepted economic methodologies for pricing financial instruments.

Assets and long positions are measured at a bid price; liabilities and short positions are measured at an asking price. Where the Bank and the Group have positions with offsetting risks, mid-market prices are used to measure the offsetting risk positions and a bid or asking price adjustment is applied only to the net open position as appropriate. Fair values reflect the credit risk of the instrument and include adjustments to take account of the credit risk.

3 Significant accounting policies, continued

(ii) Investment property and owner occupied buildings

The fair value of property is based on internal valuations performed by the Bank and the Group that are, on a regular basis (once per year or when market conditions significantly change), corroborated with external, independent valuations prepared by valuation companies, having appropriate professional qualifications and recent experience in the location and category of property being valued. The fair values are based on market values, being the estimated amount for which property could be sold on the date of the valuation between willing buyer and a willing seller in an arm's length transaction after proper marketing where the parties had each acted knowledgeably and willingly. In the year when property is obtained, purchase price could be accepted as fair value.

In the absence of current prices in an active market, the valuations are prepared by considering the aggregate of the estimated cash flows expected to be received from renting out the property. A yield that reflects the specific risks inherent in the net cash flows then is applied to the net annual cash flows to arrive at the property valuation.

Valuations reflect, when appropriate, the type of tenants actually in occupation or responsible for meeting lease commitments or likely to be in occupation after letting vacant accommodation, the allocation of maintenance and insurance responsibilities between the Group and the lessee, and remaining economic life of the property. When rent reviews or lease renewals are pending with anticipated reversionary increases, it is assumed that all notices, and when appropriate counter-notices, have been served validly and within the appropriate time.

(iii) Intangible assets

The fair value of licenses acquired in a business combination is based on the discounted estimated cash flows from the business activity subject to the license. The fair value of customer relationships acquired in a business combination is determined using the multi-period excess earning method, whereby the subject asset is valued after deducting a fair return on all other assets that are part of creating the rated flows.

(e) Cash and cash equivalents

Cash and cash equivalents include notes and coins on hand, unrestricted balances held with central banks and highly liquid financial assets with original maturities of less than three months, which are subject to insignificant risk of changes in their fair value, and are used by the Bank and the Group in the management of their short-term commitments, less balances due to credit institutions with a maturity of less than 3 months.

(f) Financial instruments

(i) Classification

The Bank and the Group initially recognise a financial asset or a financial liability in its balance sheet when, and only when the Bank and the Group becomes a party to the contract.

All financial assets, except equity instruments and derivatives, are classified based on a combination of the business model for managing the assets and the instruments' contractual cash flow characteristics. Equity instruments and derivatives are classified as measured at fair value at profit or loss.

Under IFRS 9, financial assets are classified into the following categories:

- Financial assets at amortised cost (AMC)
- Fair value through other comprehensive income (FVOCI),
- Fair value through profit or loss (FVTPL).

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

- the asset is held within a business model whose objective is to hold assets to collect contractual cash flows; and

3 Significant accounting policies, continued

- the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

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

- the asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets;
- and the contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI.

All other financial assets are mandatorily measured at FVPL.

Business model assessment

The Bank and the Group made an assessment of the objective of the business model in which a financial asset is held at a portfolio level because this best reflects the way the business is managed and information is provided to management.

In general, the business model assessment of the Group and the Bank can be summarized as follows:

- Loans and receivables have a “held to collect” business model. The financial assets consist of loans and balances with financial institutions. The management and reporting of performance are based on collecting the contractual cash flows.
- The Bank and the Group has portfolios of bonds within the “held to collect” business model, the “held to collect and sell” business models and “other” business models.
- Financial assets that are held for trading and those that are managed and whose performance is evaluated on a fair value basis are measured at FVTPL because they are neither held to collect contractual cash flows nor held both to collect contractual cash flows and to sell financial assets.

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

In assessing whether the contractual cash flows are solely payments of principal and interest, the Bank and the Group consider the contractual terms of the instrument. This includes assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition. In making the assessment, the Bank and the Group consider:

- contingent events that would change the amount and timing of cash flows;
- leverage features;
- prepayment and extension terms;
- terms that limit the Group's claim to cash flows from specified assets - e.g. non-recourse asset arrangements; and
- features that modify consideration for the time value of money - e.g. periodic reset of interest rates.

The Bank and the Group classifies all financial liabilities as subsequently measured at amortised cost, except for financial liabilities at fair value through profit or loss. Such liabilities, including derivatives that are liabilities, are subsequently measured at fair value.

(ii) Measurement

A financial asset or liability is initially measured at its fair value and, except for a financial asset or liability at fair value through profit or loss, includes transaction costs that are directly attributable to the acquisition or issue of the financial asset or liability.

The best evidence of the fair value of a financial instrument at initial recognition is the transaction price, i.e., the fair value of the consideration given or received, unless the fair value of that instrument is evidenced by comparison with other observable current market transactions with the same instrument (i.e., without modification or repackaging) or based on a valuation technique whose variables include only data from observable markets. When transaction price provides the best evidence of fair value at

3 Significant accounting policies, continued

initial recognition, the financial instrument is initially measured at the transaction price and any difference between this price and the value initially obtained from a valuation model is subsequently recognised in the profit or loss on an appropriate basis over the life of the instrument but not later than when the valuation is supported wholly by observable market data or the transaction is closed out.

Subsequent to initial recognition, financial assets other than financial assets and financial liabilities measured at amortised cost, are measured at their fair values, without any deduction for transaction costs that may be incurred on sale or other disposal.

All debt securities measured at amortised cost, loans and receivables and financial liabilities at amortised cost are measured at amortised cost. Amortised cost is calculated using the effective interest method. Premiums and discounts, including initial transaction costs, are included in the carrying amount of the related instrument and amortised based on the effective interest rate of the instrument.

Loss allowance for expected credit losses on financial assets that are measured at amortised cost or at fair value through other comprehensive income is recognised in accordance with note 3 (l).

(iii) *Gains and losses on subsequent measurement*

A gain or loss arising from a change in the fair value of a financial asset or liability is recognised as follows:

- a gain or loss on a financial asset classified as at fair value through profit or loss is recognised in profit or loss;
- a gain or loss on debt securities classified as at fair value through other comprehensive income is recognised in fair value reserve through other comprehensive income (except for impairment losses and foreign exchange gains or losses on monetary assets) until the asset is derecognised, at which time the cumulative gain or loss previously recognised in equity is recognised in profit or loss. Interest in relation to debt securities classified as at fair value through other comprehensive income is recognised as earned in profit or loss calculated using the effective interest method.

For financial assets and liabilities carried at amortised cost, a gain or loss is recognised in profit or loss when the financial asset or liability is derecognised including the instances where the terms change substantially or impaired, and through the unwinding of interest using the effective interest rate method.

(iv) *Derecognition*

A financial asset is derecognised when the contractual rights to the cash flows from the financial asset expire or when the Bank and the Group transfer substantially all of the risks and rewards of ownership of the financial asset or when the Bank and the Group neither transfer, nor retain substantially all risks and rewards of ownership but does not retain control of the financial asset. Any interest in transferred financial assets that qualifies for derecognition that is created or retained by the Bank and the Group is recognised as a separate asset or liability. A financial liability is derecognised when it is extinguished.

On derecognition of a financial asset, the difference between the carrying amount of the asset (or the carrying amount allocated to the portion of the asset transferred), and the sum of (i) the consideration received (including any new asset obtained less any new liability assumed) and (ii) any cumulative gain or loss that had been recognised in other comprehensive income is recognised in profit or loss.

(v) *Derivative financial instruments*

Derivative financial instruments include swaps, forwards, futures, and options in interest rate, foreign exchange, precious metals and stock markets, and any combinations of these instruments. The Bank and the Group classify all derivative financial instruments as financial instruments at fair value through profit and loss.

Derivatives are initially recognised at fair value on the date on which a derivative contract is entered into and are subsequently remeasured at fair value. All derivatives are carried as assets when their fair value is positive and as liabilities when their fair value is negative.

3 Significant accounting policies, continued

Derivatives may be embedded in another contractual arrangement (a “host contract”). The Bank and the Group account for an embedded derivative separately from the host contract when the host contract is not itself carried at fair value through profit or loss, the terms of the embedded derivative would meet the definition of a derivative if they were contained in a separate contract, and the economic characteristics and risks of the embedded derivative are not closely related to the economic characteristics and risks of the host contract.

(vi) Offsetting

Financial assets and liabilities are offset and the net amount reported when there is a legally enforceable right to set off the recognised amounts and there is an intention to settle on a net basis, or realise the asset and settle the liability simultaneously.

(g) Leases

Policy applicable from 1 January 2019

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

The Bank and the Group as lessee

At commencement or on modification of a contract that contains a lease component, the Group and the Bank allocates the consideration in the contract to each lease component on the basis of its relative stand-alone prices.

The Group and the Bank recognise a right-of-use asset and a lease liability at the lease commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of costs to dismantle and remove the underlying asset or to restore the underlying asset or the site on which it is located, less any lease incentives received.

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

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

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

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

The Group uses the practical expedient of low-value items where any item generating cash outflows of less than EUR 5 thousand during the lease term is expensed as incurred with no right-of-use asset or lease liability recognition.

3 Significant accounting policies, continued

The bank and the Group as lessor

When the Group and the Bank acts as a lessor, it determines at lease inception whether each lease is a finance lease or an operating lease.

To classify each lease, the Group and the Bank makes an overall assessment of whether the lease transfers substantially all of the risks and rewards incidental to ownership of the underlying asset. If this is the case, then the lease is a finance lease; if not, then it is an operating lease.

Policy applicable before 1 January 2019

The lease of property and equipment is classified as a finance lease if it transfers substantially all risks and rewards of ownership to the lessee. Title does not have to be transferred. All other leases are classified as operating leases.

The bank and the Group as lessor

Assets leased out under operating lease are carried in the statements of financial position analogously to property, plant and equipment or investment property. Income is recognised on a straight-line basis over each lease term. Other payments associated with the lease are recognised in profit or loss as a component other income.

When assets are held subject to finance lease, the present value of the minimum lease payments is recognised as a receivable. The difference between the gross receivable and the present value of the receivable before impairment allowance is recognised as unearned finance income.

The Bank and the Group as lessee

Operating lease payments are recognised in profit or loss on a straight-line basis over the lease term.

Assets acquired under finance leases include equipment. Asset acquired by way of finance lease is initially measured at an amount equal to the lower of its fair value and the present value of the minimum lease payments at inception of the lease plus initial direct costs of the lessee. Subsequent to initial recognition, these are measured at cost less accumulated depreciation and impairment losses.

(h) Property and equipment

(i) Owned assets

Items of property and equipment are carried at cost less accumulated depreciation, less accumulated impairment losses, except for land and buildings which are carried at revalued amounts as described below. Cost is the amount of cash or cash equivalents paid or the fair value of the consideration given to acquire an asset at the time of its acquisition or construction. The cost includes expenditures that are directly attributable to the acquisition of the asset.

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

(ii) Revaluation

Land and buildings of the Bank and the Group are subject to revaluation on a regular basis. The frequency of revaluation depends upon the movements in the fair values of the land and buildings being revalued. A revaluation increase on an item of land and building is recognised in equity through other comprehensive income except to the extent that it reverses a previous revaluation decrease recognised in profit or loss, in which case it is recognised in profit or loss.

A reduction in the value on an item of land or buildings is recognised in profit or loss except to the extent that it reverses a previous revaluation increase recognised in other comprehensive income, in which case it is recognised in other comprehensive income.

3 Significant accounting policies, continued

(iii) Depreciation

Depreciation is charged to the statements of profit or loss on a straight-line basis over the estimated useful lives of the individual assets. Depreciation commences on the date when the asset becomes available for use or, in respect of internally constructed assets, from the time an asset is completed and ready for use. Land is not depreciated. Depreciation methods, useful lives and residual values are reviewed annually. The estimated useful lives are as follows:

Buildings	50 years
Equipment	2.5 to 4 years
Furniture	8 years
Vehicles	2.5 to 5 years

(i) Investment property

Investment property is property held either to earn rental income or for capital appreciation or for both, but not for sale in the ordinary course of business or services or for administrative purposes. Investment property is measured at fair value with any change therein recognised in profit or loss in other operating income.

(j) Repossessed collateral

If the borrower fails to fulfil the contractual obligations, the Bank may decide that the loan agreement will be terminated and that the right to collateral pledged as security, will be exercised. According to Latvian law, the Bank and the Group cannot assume formal title of the asset pledge, but can initiate the sale, proceeds of which will be used to repay or partly repay the outstanding loan receivable. As the Bank and the Group are assuming the de facto title to the asset, and retain no contractual obligation to the original borrower, the Bank and the Group classify the asset as other assets. As well, when the Group and Bank acquires (i.e. gains a full title to) an asset in this way, the asset's classification follows the nature of its intended use by the Group and the Bank. When the Group or the Bank is uncertain of its intentions with respect to land and buildings that it has repossessed, those properties are classified as other assets. The repossessed collaterals are initially recognised at take-over value which set to be a notional cost. Subsequently, management determines a recoverable amount which usually is fair value less cost to sell as at period end using market data.

(k) Intangible assets

Intangible assets, which are acquired by the Bank and the Group, are stated at cost less accumulated amortisation and impairment losses. Acquired computer software licenses are capitalised on the basis of the costs incurred to acquire and bring to use the specific software. Amortisation is charged to the statements of profit or loss on a straight-line basis over the estimated useful lives of intangible assets. The estimated useful lives are 5 to 7 years.

(l) Measurement of expected credit losses on financial assets

At 1 January 2018, the Group and the Bank implemented the three-stage expected credit loss impairment model according IFRS 9 for loans and receivables due from customers and due from banks, financial guarantees and loan commitments, and bonds measured at amortised cost or fair value through other comprehensive income. The impairment charge for expected credit losses depends on whether the credit risk has increased significantly since initial recognition.

Under IFRS 9, loss allowances are measured on either of the following bases:

- 12-month ECLs: these are ECLs that result from possible default events within the 12 months after the reporting date; and
- lifetime ECLs: these are ECLs that result from all possible default events over the expected life of a financial instrument.

3 Significant accounting policies, continued

The Group and the Bank has established a policy to perform an assessment at the end of each reporting period of the whether credit risk has increased significantly since initial recognition by considering the change in the risk of default occurring over the remaining life of the financial instrument.

Starting with 1 January 2018, the Bank and the Group group loans, financial guarantees and commitments, bonds measured at amortised cost or fair value through other comprehensive income into Stage 1, Stage 2 and Stage 3, based on the applied impairment methodology, as described below:

- Stage 1 – Performing loans: when loans are first recognized, the Bank and the Group recognizes an allowance based on twelve months expected credit losses.
- Stage 2 – Loans with significant increase in credit risk: when a loan shows a significant increase in credit risk since initial recognition, the Bank and the Group records an allowance for the lifetime expected credit loss.
- Stage 3 – Impaired loans: Financial assets are recognized in Stage 3 when there is objective evidence that the loan is impaired. The Bank and the Group recognizes the lifetime expected credit losses for these loans.

The Bank and the Group record impairment for FVOCI debt securities depending on whether they are classified as Stage 1, 2, or 3, as explained above. However, the expected credit losses do not reduce the carrying amount of these financial assets in the statements of financial position, which remain at fair value. Instead, an amount equal to the allowance that would arise if the asset were measured at amortized cost is recognized in OCI as an accumulated impairment amount, with a corresponding charge to profit or loss.

Significant increase in credit risk

The classification of balances between stage 1 and stage 2 for the purpose of calculating expected credit losses depends on whether the credit risk has increased significantly since initial recognition. The Group and the Bank considers reasonable and supportable information that is relevant and available without undue cost or effort. This includes both quantitative and qualitative information and analysis, based on the Group's and the Bank's historical experience and expert credit assessment and including forward-looking information. The assessment of whether credit risk has increased significantly since initial recognition for loans and receivables due from customers is performed on collective basis by considering overdue period and credit risk grade migration:

- Stage 1 includes loans with below 31 overdue days and loans not defined by Stage 2 or Stage 3;
- Stage 2 includes loans with above 30 overdue days till below 91 overdue days and loans with rating that has been lowered from A or B to C, and loans with credit rating of E and D;
- Stage 3 includes loans with above 90 overdue days and additionally loans according to other qualitative indicators.

For significant loans the Group and the Bank determines the expected credit losses individually.

For bonds measured at amortised cost or fair value through other comprehensive income and loans and receivables due from banks assessment of increase in credit risk is performed by considering composite credit rating. Decrease in credit rating by more than 3 notches since the settlement date is considered as a significant increase in credit risk and bond is transferred from stage 1 to stage 2. Bond is transferred from stage 2 to stage 3 when it becomes credit-impaired. Low credit risk exemption is not used by the Group and the Bank.

Credit risk grades

The Bank allocate each exposure to a credit risk grade based on a variety of data that is determined to be predictive of the risk of default and applying experienced credit judgement. The Bank uses these grades in identifying significant increases in credit risk under IFRS 9. Credit risk grades are defined using qualitative and quantitative factors that are indicative of the risk of default. These factors vary depending on the nature of the exposure and the type of borrower.

Exposures of loans due from customers are allocated to a credit risk grade on initial recognition based on available information about the borrower. Exposures is subject to ongoing monitoring, which result

3 Significant accounting policies, continued

in an exposure being moved to a different credit risk grade. A, B, C, D and E are bank assigned rating classes based on internal rating approach. Rating classes are assigned according to the following rating scores: A \in (8;10], B \in (6;8], C \in (3;6], D \in (1;3], E \in [0;1].

For bonds measured at amortised cost or fair value through other comprehensive income composite credit rating is calculated in accordance with Regulation No 575/2013 of the European Parliament and of the Council using data provided by rating agencies.

Measurement of ECLs

The key inputs into the measurement of ECLs for the Group and the Bank are term structures of the following variables:

- Probability of default (PD);
- loss given default (LGD); and
- exposure at default (EAD).

ECL for exposures in Stage 1 is calculated by multiplying the 12-month PD by LGD and EAD. Lifetime ECL is calculated by multiplying the lifetime PD by LGD and EAD.

These parameters are derived from historical data and internally approved statistical models. They are adjusted to reflect forward-looking information.

PD estimates are estimates at a certain date, which is calculated based on statistical rating models and assessed using rating tools tailored to the various categories of counterparties and exposures. These statistical models are based on internally compiled data comprising both quantitative and qualitative factors. Credit risk grades and overdue periods are primary inputs into the determination of the term structure of PD for exposures. The Group and the Bank employ statistical models to analyse the data collected and generate estimates of the remaining lifetime PD of exposures.

The definition of default used in the measurement of expected credit losses and the assessment to determine movements between stages is consistent with the definition of default used for internal credit risk management purposes and is aligned with CRR. Hence, exposures which are considered to be in default for regulatory purposes will always be considered stage 3 under IFRS 9.

LGD is the magnitude of the likely loss if there is a default. The Group and the Bank estimates LGD parameters based on the history of recovery rates of claims against defaulted counterparties. The LGD models consider the structure, collateral, seniority of the claim, counterparty industry and recovery costs of any collateral that is integral to the financial asset. They are calculated on a discounted cash flow basis using the effective interest rate as the discounting factor.

EAD represents the expected exposure in the event of a default.

The Group and the Bank incorporates forward-looking information into the measurement of ECL. For most exposures, key macro- economic indicators include GDP growth and unemployment.

Modification

When financial asset is modified, the Group and the Bank assesses whether the modification results in derecognition. This depends on whether the changes to the contractual cash flows are significant or not. If changes are significant, the modification is accounted for as derecognition of the original asset and recognition of a new asset. If the changes are not significant, the modification is accounted for as a modification of the original loan.

Presentation of allowance for ECL in the statement of financial position

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

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

3 Significant accounting policies, continued

(m) Impairment of non-financial assets

The carrying amounts of the Bank's and the Group's non-financial assets, other than investment property and deferred tax assets, are reviewed at each reporting date to determine whether there is any indication of impairment. If any such indication exists then the asset's recoverable amount is estimated. The recoverable amount of goodwill is estimated at each reporting date.

An impairment loss is recognised if the carrying amount of an asset or its cash-generating unit exceeds its recoverable amount. A cash-generating unit is the smallest identifiable asset group that generates cash flows that largely are independent from other assets and groups. Impairment losses are recognised in profit or loss. Impairment losses recognised in respect of cash-generating units are allocated first to reduce the carrying amount of any goodwill allocated to the units and then to reduce the carrying amount of the other assets in the unit (group of units) on a pro rata basis. The cash-generating units for non-financial assets impairment testing are payment card business and non-banking activities on individual subsidiaries level.

The recoverable amount of an asset or cash-generating unit is the greater of its value in use and its fair value less costs to sell. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

An impairment loss in respect of goodwill is not reversed. In respect of other assets, impairment losses recognised in prior periods are assessed at each reporting date for any indications that the loss has decreased or no longer exists. An impairment loss is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortisation, if no impairment loss had been recognised.

(n) Provisions

A provision is recognised when the Bank and the Group have a legal or constructive obligation as a result of a past event, and it is probable that an outflow of economic benefits, which can be estimated reliably, will be required to settle the obligation. If the effect is material, provisions are determined by discounting the expected future cash flows at a pre-tax rate that reflects current market assessments of the time value of money and, where appropriate, the risks specific to the liability.

Loss allowance for expected credit losses in accordance with IFRS 9 on loan commitments and guarantee contracts is recognised as provisions. For methodology of calculation refer to note 3(1).

(o) Credit related commitments

In the normal course of business, the Bank and the Group enter into credit related commitments, comprising undrawn loan commitments, letters of credit and guarantees.

Financial guarantees are contracts that require the Bank and the Group to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payment when due in accordance with the terms of a debt instrument.

A financial guarantee liability is recognised initially at fair value net of associated transaction costs, and is measured subsequently at the higher of the amount initially recognised less cumulative amortisation or the amount of provision for losses under the guarantee. From 1 January 2018: the Group and the Bank recognises a loss allowance – see note 3 (1).

(p) Taxation

(i) Current tax

Current tax for the reporting year is the expected tax payable on the taxable income for the year, using tax rates enacted or substantially enacted at the reporting date, and any adjustment to tax payable in respect of previous years.

3 Significant accounting policies, continued

As of 1 January 2018, according Law on Enterprise Income Tax of the Republic of Latvia, the tax rate 20% is deferred to when the profit is distributed and calculated as 0.2/0.8 from net distributed dividend, the taxation period is one month.

The taxable base includes:

- distributed profit (dividends calculated, payments equivalent to dividends, conditional dividends) and
- conditionally distributed profit (non-operating expenses, doubtful debts, increased interest payments, loans to related parties, decrease of income or exceeded expenses which are incurred by entering transactions at prices other than those on the market that should be calculated using the methodology determined by the Cabinet of Ministers, benefits bestowed by the non-resident upon its staff or board (council members) regardless of whether the receiving party is a resident or a non-resident, if they relate to the operation of a permanent establishment in Latvia, liquidation quota).

The use of tax losses carried forward from previous periods is limited: it is possible to use these losses to decrease the amount of tax calculated on dividends in the reporting period by not more than 50%. It is possible to carry forward unused tax losses and use them in the previously described manner only until 2022.

(ii) *Deferred tax for Group companies located in Latvia*

In accordance with the Annual Reports and Consolidated Annual Reports Law of the Republic of Latvia, companies are permitted to recognise deferred tax supported by justified reasons. In such cases, deferred tax should be recognised, assessed and disclosed in the financial statements in line with the International Financial Reporting Standards (IFRS) as adopted by the EU. Under IAS 12 *Income taxes*, deferred tax assets and liabilities should be recognised by applying a rate expected to be applied to retained earnings. According to the new Law on Enterprise Income Tax of the Republic of Latvia adopted on 28 July 2017, and effective as of 1 January 2018, the 20% rate is only applied to distributed profits, while the 0% rate applied to retained earnings. Therefore, deferred tax assets and liabilities are recognisable as nil.

(iii) *Deferred tax for other Group companies*

Deferred tax is provided for temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the amounts used for taxation purposes. Deferred tax is not recognised for the following temporary differences: the initial recognition of goodwill, the initial recognition of assets or liabilities in a transaction that is not a business combination and that affects neither accounting nor taxable profit or loss, and differences relating to investments in subsidiaries to the extent that they probably will not reverse in the foreseeable future.

Deferred tax is measured at the tax rates that are expected to be applied to the temporary differences when they reverse, based on the laws that have been enacted or substantively enacted by the reporting date.

A deferred tax asset is recognised only to the extent that it is probable that future taxable profits will be available against which the asset can be utilised. Deferred tax assets are reviewed at each reporting date and are reduced to the extent that it is no longer probable that the related tax benefit will be realised.

(q) *Income and expense recognition*

(i) *Interest income and expense*

Interest income and expense are recognised in profit or loss using the effective interest method. The effective interest rate is the rate that exactly discounts the estimated future cash payments and receipts through the expected life of the financial asset or liability. When calculating the effective interest rate, the Bank and the Group estimate future cash flows considering all contractual terms of the financial instruments, but not future credit losses.

Fees and commission income and expenses that are integral part to the effective interest rate on financial assets and liabilities are included in the measurement of the effective interest rate.

3 Significant accounting policies, continued

(ii) Fee and commission income and expense

Fee and commission income, including mainly account servicing fees, investment management fees and credit card servicing fees, are recognised as the related services are provided. When a loan commitment is not expected to result in the draw-down of a loan, the related loan commitment fees are recognised on a straight-line basis over the commitment period.

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

(iii) Net gain/loss on financial assets at fair value through profit or loss

Net gain/loss on financial instrument at fair value through profit or loss comprises gains less losses related to trading assets and liabilities and derivatives held for risk management purposes, and includes realised and unrealised fair value changes and foreign exchange differences.

(r) Dividends

The Bank and the Group receive dividends from the equity instruments that are recorded to income when the right to receive payment is established. Proposed dividends are recognised in the financial statements only when approved by shareholders.

(s) Employee benefits

Short term employee benefits, including salaries and social security contributions, bonuses and vacation benefits are included in general administrative expenses. The Bank and The Group pay fixed security contributions to the State Social Fund on behalf of its employees during the employment period in accordance with local legal requirements.

(t) Non-current assets held for sale

Non-current assets that are expected to be recovered primarily through sale or distribution rather than through continuing use are classified as held for sale. Immediately before classification as held for sale, the assets are remeasured in accordance with Group's and Bank's accounting policies. Thereafter the assets are measured at the lower of their carrying amount and fair value less cost to sell. Impairment losses on initial classification as non-current assets held for sale and subsequent gains and losses on remeasurement are recognised in profit or loss. Gains are not recognised in excess of any cumulative impairment loss.

Once classified as held for sale, assets are no longer depreciated.

(u) Changes in accounting policies

Except for the changes below, the Group and the Bank have consistently applied the accounting policies set out in Note 3 to all periods presented in these separate and consolidated financial statements.

The Group and the Bank have adopted the following new standards and amendments to standards, including any consequential amendments to other standards, with a date of initial application of 1 January 2019.

- *IFRS 16 Leases – (Effective for annual periods beginning on or after 1 January 2019).*

IFRS 16 introduces a single, on-balance sheet lease accounting model for lessees. A lessee recognises a right-of-use asset representing its right to use the underlying asset and a lease liability representing its obligation to make lease payments. There are optional exemptions for short-term leases

and leases of low-value items. Lessor accounting remains similar to the current standard- i.e. lessors continue to classify leases as finance or operating leases.

3 Significant accounting policies, continued

IFRS 16 replaces existing leases guidance, including IAS 17 Leases, IFRIC 4 Determining whether an Arrangement contains a Lease, SIC-15 Operating Leases - Incentives and SIC-27 Evaluating the Substance of Transactions Involving the Legal Form of a Lease.

At inception of a contract, the Group and the Bank assesses whether a contract is, or contains, a lease. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for the period of time in exchange for consideration.

The Group and the Bank recognises a right-of-use asset and a lease liability at the lease commencement date. The right-of-use asset is initially measured at cost and subsequently depreciated using the straight-line method. The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the Group's and the Bank's incremental borrowing rate. The Group and the Bank presents right-of-use assets that do not meet definition of investment property in Property and equipment, lease liability in Other liabilities and accruals.

The Group and the Bank has applied IFRS 16 using the modified retrospective approach, the comparative information has not been restated.

The impact of implementation of IFRS 16:

	31 December 2018	IFRS 16	1 January 2019
The Group	'000 EUR	'000 EUR	'000 EUR
Property and equipment	42,872	2,533	45,405
Other liabilities and accruals	24,994	2,533	27,527
	31 December 2018	IFRS 16	1 January 2019
The Bank	'000 EUR	'000 EUR	'000 EUR
Property and equipment	8,386	32,015	40,401
Other liabilities and accruals	14,870	32,015	46,885

(v) Changes in presentation

In 2019 in the note fee commission income Bank has showed net result from e-commerce as offsetting reflects the substance of the e-commerce transactions. Respective adjustment made to comparatives (31 December 2018).

4 Risk management

Risk management of the Group and the Bank is an integral part of management process. The Group and the Bank has developed a Risk profile which analyzes all risks and risk drivers to which the Group and the Bank is exposed, and which is consistent with the Group's and the Bank's business model. In accordance with Risk profile for the Group and the Bank, the most important risks for the Group and the Bank are credit risk, liquidity risk, market risk, money laundering and terrorism and proliferation financing risks, sanctions risk, operational risk.

This note presents information about the Bank's and the Group's exposure to each of the above risks, the Group's and the Bank's objectives, policies and processes for measuring and managing risk.

(a) Risk management policies and procedures

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

The Council of the Bank has overall responsibility for the oversight of the risk management framework for the Bank and the Group, overseeing the management of key risks and reviewing its risk management policies as well as approving material exposures.

4 Risk management, continued

The Board of Directors of the Bank is responsible for establishing its risk management procedures, monitoring and implementation of risk mitigation measures and making sure that the Bank and the Group operate within the established risk parameters.

Chief risk officer of the Bank is responsible for the overall risk management, ensuring the implementation of common principles and methods for identifying, measuring, managing and reporting both financial and non-financial risks.

Risk Management Department monitors financial and non-financial risks by holding regular meetings with operational units in order to obtain expert judgments in their areas of expertise.

Credit risk is managed and controlled by Credit Committee; interest rate and liquidity risks by Asset and Liability Committee, Money Laundering and Terrorism and Proliferation Financing and sanctions risks levels are managed and controlled by Compliance Committee.

The Board of Directors of the Bank is responsible for establishing its risk management procedures, monitoring and implementation of risk mitigation measures and making sure that the Bank and the Group operate within the established risk parameters.

Chief risk officer of the Bank is responsible for the overall risk management, ensuring the implementation of common principles and methods for identifying, measuring, managing and reporting both financial and non-financial risks. He reports directly to the Council of the Bank.

Credit, market and liquidity risks both at portfolio and transactional levels are managed and controlled through a system of Credit Committees and an Asset and Liability Committee.

Both external and internal risk factors are identified and managed throughout the Bank's and the Group's organisational structure. Apart from the standard credit and market risk analysis, the Risk Management Department monitors financial and non-financial risks by holding regular meetings with operational units in order to obtain expert judgments in their areas of expertise.

(b) Credit risk

Credit risk is the risk of financial loss occurring as a result of default by a borrower or counterparty on their obligation to the Bank and the Group. The Bank and the Group have developed policies and procedures to manage and control credit risk. The Group's and the Bank's credit policy, credit risk strategy and Risk management policy is reviewed and approved by the Council of the Bank.

The Credit Committee reviews all loan applications on the basis of submissions by the Lending Department and the Risk Management Department.

The Group and the Bank regularly review credit and securities portfolios in order to assess the structure, quality and concentration of the portfolio, as well as to monitor market trends and control credit risk levels.

The Bank's and the Group's acceptable levels of credit risk are described in the Strategic Development Plan and in the Credit Risk Management Strategy. The Risk Management Department monitors acceptable levels of credit risk on a regular basis.

For additional information see note 3 (l).

The Bank's and the Group's maximum exposure to credit risk is set out below. The impact of possible offsetting of assets and liabilities to reduce potential credit exposure is not significant.

4 Risk management, continued

Maximum credit risk exposure

	Notes	Gross maximum credit exposure			
		Group	Bank	Group	Bank
31 December		2019	2019	2018	2018
EUR'000					
Cash and balances with the Bank of Latvia	16	503,089	503,072	466,490	466,444
Loans and receivables due from banks, gross	17	81,501	80,919	92,443	91,828
Loans and receivables due from customers, gross	19.2	599,782	668,721	689,507	782,014
Financial assets at fair value through profit or loss	18	444	444	2,418	815
Financial assets at fair value through other comprehensive income	20	290,490	290,490	159,405	159,405
Debt securities at amortised cost, gross	19.1	61,199	61,199	35,537	35,537
Total financial assets		1,536,505	1,604,845	1,445,800	1,536,043
Loan commitments	35	36,385	45,398	8,726	17,500
Financial guarantees	35	13,833	13,833	4,275	4,275
Other commitments	35	107	107	171	171
Total guarantees and commitments		50,325	59,338	13,172	21,946
Total maximum credit risk exposure		1,586,830	1,664,183	1,458,972	1,557,989

The following table sets out information about the credit quality of loans and receivables due from customers, financial assets measured at amortised cost and debt investments at fair value through other comprehensive income. Explanation of the terms 'Stage 1', 'Stage 2' and 'Stage 3' and expected credit losses included in note 3 (1).

Loans and receivables due from customers

31 December 2019

The Group

	EUR'000								
	Gross amount			Expected credit losses and provisions			Carrying amount		
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3
Past due period									
Not past due and past due <= 30 days	407,094	6,327	50,235	(2,016)	(130)	(5,455)	405,078	6,197	44,780
Past due > 30 days <= 90 days	-	975	33,598	-	(144)	(428)	-	831	33,170
Past due > 90 days	-	-	101,553	-	-	(6,318)	-	-	95,235
Total	407,094	7,302	185,386	(2,016)	(274)	(12,201)	405,078	7,028	173,185
Commitments and Guarantees	108,606	19	1,051	(105)	-	-	108,501	19	1,051

4 Risk management, continued

The Bank

	EUR'000								
	Gross amount			Expected credit losses and provisions			Carrying amount		
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3
Past due period									
Not past due and past due <= 30 days	440,671	8,125	86,076	(1,634)	(166)	(23,135)	439,037	7,959	62,941
Past due > 30 days <= 90 days	-	550	33,453	-	(11)	(395)	-	539	33,058
Past due > 90 days	-	-	99,846	-	-	(4,857)	-	-	94,989
Total	440,671	8,675	219,375	(1,634)	(177)	(28,387)	439,037	8,498	190,988
Commitments and Guarantees	146,972	1,638	3,272	(122)	(32)	-	146,850	1,606	3,272

31 December 2018

The Group

	EUR'000								
	Gross amount			Expected credit loss and provisions			Carrying amount		
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3
Past due period									
Not past due and past due <= 30 days	424,854	13,299	76,765	(2,506)	(269)	(19,318)	422,348	13,030	57,447
Past due > 30 days <= 90 days	-	13,132	521	-	(352)	(58)	-	12,780	463
Past due > 90 days	-	-	160,936	-	-	(49,105)	-	-	111,831
Total	424,854	26,431	238,222	(2,506)	(621)	(68,481)	422,348	25,810	169,741
Commitments and Guarantees	72,311	64	27,315	(75)	(1)	-	72,236	63	27,315

4 Risk management, continued

The Bank

	EUR'000								
	Gross amount			Expected credit loss and provisions			Carrying amount		
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3
Past due period									
Not past due and past due <= 30 days	477,468	19,287	112,503	(2,363)	(468)	(35,330)	475,105	18,819	77,173
Past due > 30 days <= 90 days	-	12,668	302	-	(211)	(26)	-	12,457	276
Past due > 90 days	-	-	159,786	-	-	(48,273)	-	-	111,513
Total	477,468	31,955	272,591	(2,363)	(679)	(83,629)	475,105	31,276	188,962
Commitments and Guarantees	101,154	336	48,350	(127)	(11)	-	101,027	325	48,350

Debt securities at amortised cost

31 December 2019

The Group and the Bank

	EUR'000								
	Gross amount			Expected credit losses			Carrying amount		
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3
Composite credit rating									
BB+ to B-	60,028	976	195	(617)	(38)	(8)	59 411	938	187
Total	60,028	976	195	(617)	(38)	(8)	59 411	938	187

31 December 2018

The Group and the Bank

	EUR'000								
	Gross amount			Expected credit loss			Carrying amount		
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3
Composite credit rating									
BB+ to B	36,127	-	-	(590)	-	-	35,537	-	-
Total	36,127	-	-	(590)	-	-	35,537	-	-

4 Risk management, continued

Financial assets at fair value through other comprehensive income

31 December 2019

The Group and the Bank

EUR'000

	Gross amount			Expected credit losses			Carrying amount		
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3
Composite credit rating									
AAA to B-	286 436	4 354	-	(451)	(218)	-	285 985	4 136	-
CCC+ to CCC-	308	56	-	(37)	(19)	-	271	37	-
Not rated	-	-	61	-	-	-	-	-	61
Total	286 744	4 410	61	(488)	(237)	0	286 256	4 173	61

31 December 2018

The Group and the Bank

EUR'000

	Gross amount			Expected credit losses			Carrying amount		
	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3	Stage 1	Stage 2	Stage 3
Composite credit rating									
AAA to B+	159,591	-	-	(230)	-	-	159,361	-	-
Not rated	-	-	44	-	-	-	-	-	44
Total	159,591	-	44	(230)	-	-	159,361	-	44

(c) Market risk

Market risk is the risk that movements in market prices, including foreign exchange rates, interest rates, credit spreads and equity prices will affect the Bank's and the Group's income or the value of its portfolios. Market risks comprise currency risk, interest rate risk and other price risk. Market risk arises from open positions in interest rate, currency and equity financial instruments, which are exposed to general and specific market movements and changes in the level of volatility of market prices.

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

Overall authority for market risk is vested in the Asset and Liability Committee (ALCO), chaired by the Chairman of the Board of Directors. Market risk limits are approved by ALCO based on recommendations of the Risk Management Department.

The Bank and the Group manage their market risk by setting open position limits in relation to financial instruments, interest rate maturity and currency positions and stop-loss limits, which are monitored on a regular basis by the Risk Management Department.

In addition, the Bank and the Group use a wide range of stress tests to model the financial impact of a variety of exceptional market scenarios on individual trading portfolios and the Bank and the Group's overall position. Stress tests provide an indication of the potential size of losses that could arise in extreme conditions. In order to identify the market risk of financial assets at fair value through other comprehensive income and financial assets at fair value through profit or loss, the Bank and the Group uses the following parameters:

- Changes in the SWAP and money market yield curve (based on ECB scenario) to measure the impact from interest rate risk;

4 Risk management, continued

- Changes in credit spreads by the type of borrower (based on ECB scenario) to measure the impact from credit risk;
- Market price depreciation to measure the impact from equity risk.

Moreover, Bank measures value at risk (VaR) and value at interest rate risk (VaIRR) to control the potential losses arising from financial assets at fair value through other comprehensive income and financial assets at fair value through profit or loss.

The VaR shows the potential loss amount for 1-day and 10-day periods with 99% confidence level.

The Group	2019		2018	
	VaR 1d 99%	VaR 10d 99%	VaR 1d 99%	VaR 10d 99%
'000 EUR				
Financial assets at fair value through other comprehensive income	(351)	(1,108)	(376)	(1,188)
Financial assets at fair value through profit or loss	(9)	(29)	(11)	(35)
The Bank	2019		2018	
'000 EUR	VaR 1d 99%	VaR 10d 99%	VaR 1d 99%	VaR 10d 99%
Financial assets at fair value through other comprehensive income	(351)	(1,108)	(376)	(1,188)
Financial assets at fair value through profit or loss	(9)	(29)	(11)	(35)

(i) *Interest rate risk*

Interest rate risk is a possible unfavourable impact on the profit and the economic value of the Bank and the Group due to fluctuations of interest rates.

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

Starting from 30 June 2019, came in force EBA Guidelines on interest rate risk management from non-trading book activities (EBA/GL/2018/02) related to interest rate risk measurement and management. As a result, the Bank and the Group developed changes to its valuation and management system as well as in policies and procedures to manage interest rate risk in line with EBA Guidelines.

The main objective of the policy is to determine and take a set of measures to minimise the possible unfavourable impact of the interest rate fluctuations on earnings and economic value of the Bank and the Group.

The Bank and the Group uses the following quantitative risk assessment methods for interest rate risk assessment:

- GAP analysis (the volume of mismatches in different time bands);
- modified duration (change of economic value according to a scenario of interest rate fluctuations);
- stress testing (impact on earnings of the Bank and the Group according to a scenario of interest rate fluctuations and change of economic value according to a scenario of interest rate fluctuations).

For further analysis of interest repricing refer to Note 42 Interest rate risk analysis.

An analysis of sensitivity of the net income for the year to changes of market interest rate impacting the interest income on variable interest rate financial instrument and the fair value of fixed interest rate

4 Risk management, continued

financial instruments measured at fair value based on a scenario of a 100 basis point (bp) symmetrical fall or rise in all yield curves, all other variables remaining constant, is as follows:

Group '000 EUR	2019		2018	
	Profit for the period	Other comprehensive income	Profit for the period	Other comprehensive income
100bp parallel increase	6,559	-	1,780	-
100bp parallel decrease	(6,559)	-	(1,780)	-

Bank '000 EUR	2019		2018	
	Profit for the period	Other comprehensive income	Profit for the period	Other comprehensive income
100bp parallel increase	6,398	-	2,491	-
100bp parallel decrease	(6,398)	-	(2,491)	-

(ii) **Currency risk**

The Bank and the Group have assets and liabilities denominated in several foreign currencies. Foreign currency risk arises when the actual or forecasted assets in a foreign currency are either greater or less than the liabilities in that currency. For further information on the Bank's and the Group's exposure to currency risk at year-end refer to Note 41 Currency analysis.

An analysis of sensitivity of the Bank's and the Group's net income and other comprehensive income for the year to changes in the foreign currency exchange rates based on positions existing as at 31 December 2019 and 2018 and a scenario of a 5% change in USD to EUR exchange rates, while the other variable remain constant, is as follows:

Group '000 EUR	2019		2018	
	Profit for the period	Other comprehensive income	Profit for the period	Other comprehensive income
5% appreciation of USD against EUR	(300)	-	377	-
5% depreciation of USD against EUR	300	-	(377)	-

Bank '000 EUR	2019		2018	
	Profit for the period	Other comprehensive income	Profit for the period	Other comprehensive income
5% appreciation of USD against EUR	(41)	-	15	-
5% depreciation of USD against EUR	41	-	(15)	-

(iii) **Price risk**

Price risk is the risk that the value of a financial instrument will fluctuate as a result of changes in market prices, whether those changes are caused by factors specific to the individual instrument or factors affecting all instruments traded in the market. Price risk arises when the Bank and the Group take a long or short position in a financial instrument.

An analysis of sensitivity of the Bank's and the Group's price risk is included in the VaR model described in note 4 (c).

4 Risk management, continued

(d) Liquidity risk

Liquidity risk is the risk that the Bank and the Group will encounter difficulty in raising funds to meet its commitments. Liquidity risk exists when the maturities of assets and liabilities do not match. The matching and/or controlled mismatching of the maturities and interest rates of assets and liabilities is fundamental to the management of financial institutions, including the Bank and the Group. It is unusual for financial institutions ever to be completely matched since business transacted is often of an uncertain term and of different types. An unmatched position potentially enhances profitability, but can also increase the risk of losses.

The Bank and the Group maintain liquidity management with the objective of ensuring that funds will be available at all times to honour all cash flow obligations as they become due. The Bank's and the Group's liquidity policies are reviewed and approved by the Council of the Bank.

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

The liquidity management policies of the Bank and the Group require:

- projecting cash flows by major currencies and considering the level of liquid assets necessary in relation thereto;
- maintaining a diverse range of funding sources;
- managing the concentration and profile of debts;
- maintaining debt financing plans;
- maintaining a portfolio of highly marketable assets that can easily be traded as protection against any interruption to cash flow;
- maintaining liquidity and funding contingency plans;
- monitoring balance sheet liquidity ratios against regulatory requirements.

The daily liquidity position is monitored under a variety of scenarios covering both normal and more severe market conditions is performed by the Treasury and Financial Markets Department. The Risk Management Department provide a regular liquidity stress testing under a variety of scenarios covering both normal and more severe market conditions. Under normal market conditions, liquidity reports covering the liquidity position of the Bank and the Group are presented to senior management on a daily basis. Decisions on the Bank's and the Group's liquidity management are made by the Asset and Liability Management Committee and implemented by the Treasury and Financial Markets Department.

The process of the Bank's liquidity management includes assessment and analysis of banking financing sources. A significant source of funding is customer demand deposits, most of which are current accounts. These funds are considered to be open-ended, i.e. they have no contractual maturity and are available to customers without any restrictions on withdrawals. Experience of the Bank and conducted statistical analysis, applied on historical data of changes on current account and card account balances, make it possible to estimate the effective maturity of such funds remaining in the accounts of the Bank. Current accounts and the conceptually similar deposit types due to "on demand" are classified in line with the Bank's experience regarding the life cycle of these deposits with the Bank. The following table provides a breakdown of demand deposits based on the time of their presence in the account, which does not exceed 5 years.

Derivative financial liabilities are included in the analysis if their contractual maturities are essential for an understanding of the timing of the cash flows. Both the interest and principal cash flows should be included in the analysis as this best represents the liquidity risk being faced by the Group and the Bank.

4 Risk management, continued

The Group

Analysis of financial liabilities' undiscounted cash flows based on effective maturity as at 31 December 2019:

EUR'000	Demand and less than 1 month	From 1 to 3 months	From 3 months to 1 year	From 1 year to 5 years	More than 5 years	Total gross amount outflow/ (inflow)	Carrying amount
Non-derivative liabilities							
Deposits and balances due to banks	2,920	-	-	-	-	2,920	2,920
Current accounts and deposits due to customers	344,802	78,771	240,973	661,188	23,764	1,349,498	1,319,833
Other borrowed funds-bonds-issued debt securities	-	-	-	788	-	788	712
Lease liability	53	100	461	1,769	624	3,007	2,262
Other financial liabilities	1,693	-	-	3,545	-	5,238	5,238
Derivative liabilities							
- Inflow	(79)	(11,165)	-	-	-	(11,244)	-
- Outflow	80	11,258	-	-	-	11,338	94
Total	349,469	78,964	241,434	667,290	24,388	1,361,545	1,331,059
Guarantees (maximum credit risk exposure)	-	-	-	-	4,500	4,500	13,939
Credit related commitments (maximum credit risk exposure)	36,385	-	-	-	-	36,385	36,385

Analysis of financial liabilities' undiscounted cash flows based on effective maturity as at 31 December 2018:

EUR'000	Demand and less than 1 month	From 1 to 3 months	From 3 months to 1 year	From 1 year to 5 years	More than 5 years	Total gross amount outflow/ (inflow)	Carrying amount
Non-derivative liabilities							
Deposits and balances due to banks	2,403	-	-	-	-	2,403	2,403
Current accounts and deposits due to customers	239,508	63,766	203,283	517,020	23,462	1,047,039	1,019,696
Issued debt securities	-	-	-	72	-	72	62
Other financial liabilities	799	-	-	7,075	-	7,874	7,874
Total	242,710	63,766	203,283	524,167	23,462	1,057,388	1,030,035
Guarantees (maximum credit risk exposure)	372	490	3,328	220	-	4,410	4,446
Credit related commitments (maximum credit risk exposure)	8,726	-	-	-	-	8,726	8,726

4 Risk management, continued

The Bank

Analysis of financial liabilities' undiscounted cash flows based on effective maturity as at 31 December 2019:

EUR'000	Demand and less than 1 month	From 1 to 3 months	From 3 months to 1 year	From 1 year to 5 years	More than 5 years	Total gross amount outflow/ (inflow)	Carrying amount
Non-derivative liabilities							
Deposits and balances due to banks	2,920	-	-	-	-	2,920	2,920
Current accounts and deposits due to customers	360,233	78,772	238,523	660,731	23,765	1,362,024	1,332,529
Lease liability	199	400	1,799	11,597	28,618	42,613	30,840
Other financial liabilities	1,262	-	-	3,532	-	4,794	4,794
Derivative liabilities							
- Inflow	(79)	(11,165)	-	-	-	(11,244)	-
- Outflow	80	11,258	-	-	-	11,338	94
Total	364,615	79,265	240,322	675,860	52,383	1,412,445	1,371,177
Guarantees (maximum credit risk exposure)	-	-	-	-	4,500	4,500	13,939
Credit related commitments (maximum credit risk exposure)	45,398	-	-	-	-	45,398	45,398

Analysis of financial liabilities' undiscounted cash flows based on effective maturity as at 31 December 2018:

EUR'000	Demand and less than 1 month	From 1 to 3 months	From 3 months to 1 year	From 1 year to 5 years	More than 5 years	Total gross amount outflow/ (inflow)	Carrying amount
Non-derivative liabilities							
Deposits and balances due to banks	2,348	-	-	-	-	2,348	2,348
Current accounts and deposits due to customers	256,030	61,654	201,171	516,368	23,462	1,058,685	1,033,539
Other financial liabilities	773	-	-	7,071	-	7,844	7,844
Total	259,151	61,654	201,171	523,439	23,462	1,068,877	1,043,731
Guarantees (maximum credit risk exposure)	373	490	3,328	220	-	4,411	4,446
Credit related commitments (maximum credit risk exposure)	17,500	-	-	-	-	17,500	17,500

4 Risk management, continued

The Group

The table below analyses the Bank's and the Group's non-derivative financial liabilities and net-settled derivative financial liabilities into relevant maturity groupings based on the remaining period at the reporting date to the contractual maturity date.

Analysis of financial liabilities' contractual undiscounted cash flows as at 31 December 2019:

EUR'000	Demand and less than 1 month	From 1 to 3 months	From 3 months to 1 year	From 1 year to 5 years	More than 5 years	Total gross amount outflow/ (inflow)	Carrying amount
Non-derivative liabilities							
Deposits and balances due to banks	2,920	-	-	-	-	2,920	2,920
Current accounts and deposits due to customers	717,536	53,867	196,566	357,765	23,764	1,349,498	1,319,833
Other borrowed funds-bonds-issued debt securities	-	-	-	788	-	788	712
Lease liability	53	100	461	1,769	624	3,007	2,262
Other financial liabilities	1,693	-	-	3,545	-	5,238	5,238
Derivative liabilities							
- Inflow	(79)	(11,165)	-	-	-	(11,244)	-
- Outflow	80	11,258	-	-	-	11,338	94
Total	722,203	54,060	197,027	363,867	24,388	1,361,545	1,331,059
Guarantees (maximum credit risk exposure)	-	-	-	-	4,500	4,500	13,939
Credit related commitments (maximum credit risk exposure)	36,385	-	-	-	-	36,385	36,385

Analysis of financial liabilities' contractual undiscounted cash flows as at 31 December 2018:

EUR'000	Demand and less than 1 month	From 1 to 3 months	From 3 months to 1 year	From 1 year to 5 years	More than 5 years	Total gross amount outflow/ (inflow)	Carrying amount
Non-derivative liabilities							
Deposits and balances due to banks	2,403	-	-	-	-	2,403	2,403
Current accounts and deposits due to customers	587,587	16,624	146,729	272,888	23,462	1,047,290	1,019,696
Issued debt securities	-	-	-	72	-	72	62
Other financial liabilities	799	-	-	7,075	-	7,874	7,874
Total	590,789	16,624	146,729	280,035	23,462	1,057,639	1,030,035
Guarantees (maximum credit risk exposure)	372	490	3,328	220	-	4,410	4,446
Credit related commitments (maximum credit risk exposure)	8,726	-	-	-	-	8,726	8,726

4 Risk management, continued

The Bank

Analysis of financial liabilities' contractual undiscounted cash flows as at 31 December 2019:

EUR'000	Demand and less than 1 month	From 1 to 3 months	From 3 months to 1 year	From 1 year to 5 years	More than 5 years	Total gross amount outflow/ (inflow)	Carrying amount
Non-derivative liabilities							
Deposits and balances due to banks	2,920	-	-	-	-	2,920	2,920
Current accounts and deposits due to customers	732,967	53,868	194,116	357,308	23,765	1,362,024	1,332,529
Lease liability	199	400	1,799	11,597	28,618	42,613	30,840
Other financial liabilities	1,262	-	-	3,532	-	4,794	4,794
Derivative liabilities							
- Inflow	(79)	(11,165)	-	-	-	(11,244)	-
- Outflow	80	11,258	-	-	-	11,338	94
Total	737,349	54,361	195,915	372,437	52,383	1,412,445	1,371,177
Guarantees (maximum credit risk exposure)	-	-	-	-	4,500	4,500	13,939
Credit related commitments (maximum credit risk exposure)	45,398	-	-	-	-	45,398	45,398

Analysis of financial liabilities' contractual undiscounted cash flows as at 31 December 2018:

EUR'000	Demand and less than 1 month	From 1 to 3 months	From 3 months to 1 year	From 1 year to 5 years	More than 5 years	Total gross amount outflow/ (inflow)	Carrying amount
Non-derivative liabilities							
Deposits and balances due to banks	2,348	-	-	-	-	2,348	2,348
Current accounts and deposits due to customers	604,109	14,387	144,492	272,235	23,462	1,058,685	1,033,539
Other financial liabilities	773	-	-	7,071	-	7,844	7,844
Total	607,230	14,387	144,492	279,306	23,462	1,068,877	1,043,731
Guarantees (maximum exposure)	373	490	3,328	220	-	4,411	4,446
Credit related commitments	17,500	-	-	-	-	17,500	17,500

4 Risk management, continued

(e) Risk of Money Laundering and Terrorism and Proliferation Financing, and Violation of Sanctions

The risk of money laundering and terrorism and proliferation financing is the impact and likelihood that the credit institution may be used in the laundering of proceeds derived from criminal activity or in terrorism and proliferation financing in relation to the financial services it provides, its customer base, the geographic operational profile of its customers, and the supply channels of products and services.

The objective of the Bank's operating policy is to provide business activities in conformity with the legislation and international requirements regulating actions, securing itself against the risk to get involved in possible money laundering and terrorism and proliferation financing transactions and those that violate restrictions of the applicable national and international sanctions, to minimise the possibility to cooperate with the customers whose activities fail to comply with the legislation and the Bank's policy, to protect the Bank from possible losses, to prevent damage to the Bank's reputation and not to permit the loss of confidence in the Bank.

To achieve these objectives the Bank in its activity fulfils the following tasks:

- observes, fulfils and introduces in its activity requirements of laws of the Republic of Latvia and international legislation, recommendations and guidelines by supervision authorities;
- according to requirements of the legislation and supervision authorities develops and implements internal regulatory documents – procedures, regulations, orders;
- according to requirements of the legislation cooperates with state institutions and correspondent banks;
- ensures sufficient financial, material and human resources to implement the Bank's policy
- organises and trains the staff in the sphere of anti-money laundering and anti-terrorism/proliferation financing, observance of sanctions regimes, compliance with the legislation and implementation of the Bank's policy;
- implements in its daily activity principles under the Bank's policy;
- controls the execution of the Bank's policy.

To mitigate ML/TPF risk, the bank has formulated an internal ML/TPF risk management and prevention system encompassing activities and measures aimed at ensuring compliance with the requirements of the Anti-Money Laundering and Counter-Terrorism/Proliferation Financing Law, Cabinet Regulations, FCMC Regulations and other applicable regulations.

There is according to the AML requirements designated AML/CTPF Board Member, whose area of responsibility is the activity of the Bank in AML/CTPF. The designated AML/CTPF Board Member controls the observance of requirements of the Bank's policy and other external and internal AML/CTPF regulations in the Bank, and together with the Board makes strategic decisions within the framework of the Bank's policy to be implemented.

The Bank has formed the Compliance Committee - a collegial body aimed to make significant, long-term decisions on the measures to be taken to ensure the compliance of business activity of the Bank with the AML/CTPF legislation and the observance of the applicable sanctions regimes, as well as to protect the Bank from its involvement into malicious illegal activities, thus compromising the good reputation of the Bank and as a result to prevent from losses arising from above said.

To ensure making effective decisions on the measures to be taken to secure the Bank against the risk to get involved in possible ML/TPF transactions and breaches of the applicable national and international sanctions regimes, the Bank has formed the Customer Policy Compliance Committee - a collegial body established with the aim to ensure the assessment of the Bank's customer transactions and that the cooperation between the Bank and the customer meets the legislation regulating AML/CTPF, and the observance of the national and international sanctions.

4 Risk management, continued

The Bank has formed a structural unit for AML/CTPF and the applicable national and international sanctions monitoring – the Internal Control Department. The main purpose of the structural unit is daily implementation of actions aimed at AML/CTPF, prevention of the breach of the applicable national and international sanctions regimes, the customer identification and due diligence, monitoring of customer transactions, detection of suspicious transactions and reporting relevant data to the authorized bodies/supervision authorities.

The Head of the Internal Control Department is the designated AML/CTPF officer appointed in the Bank according to requirements of the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing of the Republic of Latvia. The Head of the Internal Control Department ensures the execution of requirements of the policy in the Bank by making day-to-day decisions on the measures implementing the policy and is in charge for the information exchange with supervision authorities.

The following international and national sanctions are binding to the Bank – those of the United Nations (UN), the European Union (EU), the Republic of Latvia and the Office of Foreign Assets Control (OFAC) of the US Department of the Treasury.

Sanctions Policy of the Bank sets out the key principles and requirements that govern the Bank's approach to sanctions of the UN, the EU, the Republic of Latvia and the OFAC.

The Bank prohibits business activity, including prohibitions on commencing or continuing relationship with a customer or provision of products or services or facilitation of transactions that the Bank believes may violate the applicable sanctions legislation or the Sanctions Policy.

There is an allocated Sanctions Officer, who oversees, improves and develops the internal regulations according to legislative requirements of the EU and the Republic of Latvia and ensures the best practice and efficiency in sanctions monitoring by ensuring integrity and compliance with the internal requirements.

The Bank's main AML/sanctions policy principles are as follows:

The Bank according to its activity type by assessing and understanding ML/TPF risk and the risk of breaching applicable national and international sanction restrictions, associated with its activity and customers, develops AML/CTPF internal control system, which includes drafting respective policies and procedures.

The Bank allocates and contributes sufficient financial, material and intellectual resources to ensure due activity, to monitor its customers' activity and to implement the Bank's policy.

The Bank ensures that the employees in charge with identification, registration, servicing, monitoring and due diligence of the Bank's customers understand and acknowledge risks associated with ML/TPF and breach of sanctions regimes, AML/CTPF legislation and organises regular personnel training to improve their skills to meet requirements of the internal control system, raise their qualification and quality of work.

The Bank at least once in 18 calendar months ensures that an independent examination of the ML/TPF and sanctions breach risk management internal control system, including the information technology solutions used, is carried out and where required takes measures to improve the efficiency of the internal control system.

The Bank, in compliance with the requirements of the legislation and legal empowerment of the participant of civil law relations of the private law, ensures the activity of the internal control system that allows to know its customers' business activities according to the specific character of the customers' business, and monitors and conducts due diligence of transactions by documenting such activities to secure itself against the risk to get involved in possible ML/TPF transactions and breaches of the national and international sanctions restrictions.

The Bank cooperates or starts to cooperate only with foreign banks, which have AML/CTPF legislation in effect in its country, and the foreign banks observe this legislation. The Bank does not cooperate with foreign shell banks, banks located in jurisdictions with low "Know Your Customer" standards or recognised as banks not cooperating in combating ML/TPF.

4 Risk management, continued

The Bank, when forming mutually beneficial long-term business relations with a customer, performs its activity in the way, which ensures that it is safe against the risk of being involved in possible ML/TPF transactions and breaches of the national and international sanctions regimes.

AML/CTPF activities are implemented by all the employees of the Bank's structural units involved in the customer engagement, identification, service and due diligence.

FCCM regularly performs reviews/audits of the Bank's compliance with the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing.

In order to improve the Bank's compliance with AML several external reviews and audits were performed by independent parties.

The latest comprehensive external AML audit was conducted from November 2017 to April 2018 (a comprehensive AML audit for compliance with the requirements of the Latvian legislation and best international practice performed by KPMG Baltics AS). Based on the audit results, the Bank developed an action plan for the implementation of recommendations aimed at specific improvements in the internal control system, which were approved by the Bank's Management Board. The Bank regularly reported to the local Regulator (FCCM) on the implementation of the mentioned audit recommendations. Relevant Progress Reports were approved at the meetings of the Bank's Management Board. As of April 2019, the Bank implemented the planned improvements to the internal control system based on the audit recommendations received, which was reported to the Latvian Regulator.

Besides, in 2019 the Bank has assigned KPMG Baltics AS to perform the gap analysis of the findings set out by the Navigant audit for compliance with US legislation and requirements that was conducted earlier (in 2016). The aim of this gap analysis was to compare the Bank's implemented actions as outlined in the Action Plan and audit's recommendations to cover the identified gaps with the US regulatory requirements and industry better practice. No observations have been assessed as "significant" or "critical".

In addition Internal Audit Service performs internal audits of the Bank's AML risks management system on a regular basis.

The Financial and Capital Market Commission on 24 May 2019 initiated an administrative case against the Bank regarding the violation of the requirements specified in Clause 5.5 of the Cabinet of Ministers Regulations No. 674 "Regulations Regarding the List of Unusual Transaction Indicators and the Procedures for Submitting Reports on Unusual or Suspicious Transactions", dated 14.11.2017, (hereinafter – Regulations No. 674) regarding the submission of reports on unusual transactions where the client sends or receives cross-border payment in foreign currency the amount of which is equivalent to EUR 500 thousand or more. The Bank is in negotiation process with Financial and Capital Market Commission on conclusion of the Administrative agreement within administrative case. As at 31 December 2019 the Bank has not made any provisions for contingent liability as the management of the Bank is certain that if there would be a fine, the amount will not have any material effect on the financial statements.

(f) Operational risk

Operational risk refers to the risk of losses resulting from inadequate or failed internal processes or procedures, human error, system failure or external events. The definition includes legal risk and information risk.

In order to prevent increase of operational risk, the Bank and Group provides monitoring of operational risks, i. e. – daily monitoring on how the Bank's and Group's employees follow the internal regulations, permanent monitoring of the employees' performance quality, as well as regular monitoring of business processes and technological liaison.

To ensure conditions for effective disclosure of significant operational risk, as well as general evaluation of operational risk, the Risk Management Department maintains an analytical Bank's and Group's operational risk management database "RB Operational risk", which provides complete information regarding operational risk events, their types and scope in terms of activities directions, particular bank operations and other deals, conditions of their emergence and disclosure; and regarding losses, which

4 Risk management, continued

have occurred. The Board of Directors of the Bank in cooperation with the Risk Management Department informs the Council of the Bank on the key directions of concentration of operational risk, causes for its emergence and measures taken to decrease any possible operational losses.

(g) Capital Management

The Bank's and the Group's policy is to maintain a strong capital base so as to maintain investor, creditor and market confidence and to sustain future development of the business. The impact of the level of capital on shareholders returns is also recognised and the Bank and the Group recognise the need to maintain a balance between the higher returns that might be possible with greater gearing and the advantage and security afforded by a solid capitalization. The Financial and Capital Market Commission sets and monitors capital requirements for the Bank and for the Group.

The Bank and the Group define as capital those items defined by statutory regulation as capital. Under the current capital requirements set by Financial and Capital Market Commission, banks must maintain a ratio of capital to risk weighted assets ("capital ratio") above the prescribed minimum level. As at 31 December 2019, the individual minimum level for the Bank is 12.3% (2018: 12.1%). The Bank was in compliance with the statutory capital ratio during the years ended 31 December 2019 and 31 December 2018. As at 31 December 2019 required for the Bank TSCR (total capital requirement) ratio is 12.3%, OCR (overall capital requirement) ratio is 16.09% (2018: TSCR ratio 12.1%, OCR ratio 16.11%).

The following table shows the composition of the Bank's and the Group's capital position calculated in accordance with the requirements of Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (CRR):

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Tier 1 capital				
Share capital	168,916	168,916	142,287	142,287
Share premium	52,543	52,543	6,843	6,843
Other reserves	23	23	89	23
Accumulated other comprehensive income	2,609	3,578	(3,211)	(2,246)
Other transitional adjustment to CET1 Capital	5,630	6,375	6,292	7,125
Value adjustments due to the requirements for prudent valuation	(301)	(300)	(171)	(171)
Retained earnings from prior years	71,882	64,279	223,099	216,791
Current year profit	21,739	18,431	22,750	21,483
Intangible assets	(2,092)	(2,074)	(2,499)	(2,498)
Deferred tax assets	(107)	-	(173)	-
Additional deductions of CET1 Capital due to Article 3 (CRR)	(42,782)	(41,673)	(41,097)	(36,322)
Total tier 1 capital	278,060	270,098	354,209	353,315
Tier 2 capital				
Paid up capital instruments (preference shares)	-	-	26,629	26,629
Share premium (preference shares)	-	-	45,700	45,700
Long term deposits qualifying as regulatory capital	29,307	29,307	37,944	37,944
Total tier 2 capital	29,307	29,307	110,273	110,273
Total capital	307,367	299,405	464,482	463,588
Total risk exposure amount	1,367,430	1,363,640	1,289,905	1,265,980
Total capital ratio	22.48%	21.96%	36.01%	36.62%

4 Risk management, continued

Calculations are performed based on prudential consolidation group according to the Basel Accord of (EU) Regulation No 575/2013 a.19.

In June 2019, the Bank's Shareholders decided to terminate non-voting preference shares and replace them with B category dematerialized registered non-voting shares and to approve the Bank's Statutes in a new wording. In December 2019, the Bank received FCMC approval to include in CET1 capital a new type of equity instrument - non-voting shares (B category registered shares).

5 Use of estimates and judgements

The preparation of financial statements in conformity with IFRS as adopted by the EU requires management to make judgments, estimates and assumption that affect the application of policies and reported amounts of assets and liabilities, income and expenses. Although these estimates are based on management's best knowledge of current events and actions, actual results ultimately may differ from those estimates.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period, in which the estimate is revised if the revision affects only that period, or in the period of the revision and future periods if the revision affects both current and future periods.

Key sources of estimation uncertainty and judgement:

(i) *Allowances for expected credit losses on financial assets at amortised cost and financial assets at fair value through other comprehensive income*

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

Note 3(i) and Note 3(u): classification of financial assets: assessment of the business model within which the assets are held and assessment of whether the contractual terms of the financial asset are SPPI on the principal amount outstanding.

Note 3(l): establishing the criteria for determining whether credit risk on the financial asset has increased significantly since initial recognition, incorporation forward-looking information into measurement of ECL and models used to measure ECL.

(ii) *Determining fair value of financial instruments*

All financial instruments that are carried at fair value were valued based on their market value. Fair value of financial instruments carried at amortised cost is stated at present value of future estimated cash flows discounted by a market interest rate. For short term financial assets and liabilities the fair value approximate amortised cost.

(iii) *Determining fair value of investment property and owner occupied property*

Investment property is stated at its fair value with all changes in fair value recorded in profit or loss. Property used in own business operation (Vesetas street 7, Riga) is revaluated to fair value on regular periodic basis with changes in revaluation recognised through other comprehensive income in a revaluation reserve and subsequent amortisation is recognised in the profit and loss statements. When measuring the fair value of the property, management relies on external valuations based either on income valuation method or comparative valuation method and assesses the reliability of such valuation in light of the current market situation. Income method is based on discounted estimated future cash flows from the property. Comparative method is based on recent market transactions with comparable property.

5 Use of estimates and judgments, continued

(iv) *Impairment of assets shown under other assets*

Assets are valued at lower of cost and net realisable value. When assessing net realisable value of assets, management prepares several valuation models (e.g. replacement cost, discounted future cash flows) and compares them to observable market data (e.g. similar transactions taking place on the market, offer made by potential buyers).

(vi) *Impairment of investments in subsidiaries*

Investments in subsidiaries are valued at cost less accumulated impairment losses in the Bank's separate financial statements. On a regular basis, the Bank compares the cost of investment with the carrying amount of net assets of a subsidiary to see whether any impairment indication exists. In addition, the management assessed future cash flows to be generated by the subsidiaries and as a result of this assessments concluded that there is no objective evidence of impairment of the investment. If impairment indication exists, the recoverable amount of the investment is calculated based on discounted estimated future cash flows of the subsidiary. Future cash flows are based on budgets and projections prepared by the subsidiary and assessed for reasonableness.

(vii) *Useful lives of equipment*

Estimated useful lives of equipment are based on practical experience over using similar equipment in the past. Each year damaged items and technically out-of-date items are identified and their useful life or carrying amount is adjusted individually.

(viii) *Consolidation of investment funds*

The Group is holding units of investment funds for which it acts as asset management company, i.e. has power over investment decisions within the investment strategy published in the fund prospectus. At each reporting date the Group evaluates the linkage between power and exposure to variable returns and decides whether the respective fund shall be consolidated or not.

(ix) *Acquisition of new subsidiaries*

Upon each acquisition of a subsidiary, the Group evaluates whether it obtained control over business as defined by IFRS adopted by EU, in which case acquisition accounting is applied. If control is gained only over individual assets and liabilities, the consideration paid is allocated to the acquired assets and liabilities.

(x) *Estimating provisions*

The amount recognised as a provision is the best estimate of the expenditure required to settle the present obligation at the end of the reporting period. Management of the Bank and the Group estimates the amount that the Bank and the Group would rationally pay to settle the obligation. Estimates of outcome and financial effect are determined by the judgement of the management, supplemented by experience of similar transactions and, if necessary, reports from independent experts.

6 Net interest income

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Interest income				
Loans and receivables due from customers	41,966	29,318	49,301	36,991
Loans and receivables due from financial institutions	1,325	1,318	4,082	4,008
Financial assets at fair value through other comprehensive income	4,033	4,033	1,532	1,532
Financial assets at Amortised Cost	4,115	4,113	4,477	4,457
Amounts receivable under reverse repurchase agreements	-	-	132	132
Financial assets at fair value through profit or loss	29	29	215	215
Other interest income	59	-	-	-
	51,527	38,811	59,739	47,335
Interest expense				
Current accounts and deposits due to customers	10,664	10,498	7,127	7,082
Deposits and balances due to financial institutions	2,265	2,273	2,999	2,572
Other interest expense	4,950	4,553	5,129	3,997
	17,879	17,324	15,255	13,651

Effective interest rate on account balances in certain currencies is negative. As the interest resulting from a negative effective interest rate on financial assets reflects an outflow of economic benefits, it is presented as interest expense.

7 Fee and commission income

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Commission from account servicing	9,507	9,513	25,170	25,176
Money transfers	2,395	2,395	4,125	4,125
Commission income from payment cards	2,132	2,132	3,886	3,886
Revenue from customer asset management and brokerage commissions	1,992	1,406	4,859	4,273
Commission from documentary operations	113	113	195	195
E-commerce	150	150	-	-
Cash withdrawals	72	72	145	145
Other	2,039	1,938	8,680	8,584
	18,400	17,719	47,060	46,384

8 Fee and commission expense

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Payment card expenses	1,073	1,073	3,779	3,779
Agent commissions	2,357	1,846	2,649	2,147
On correspondent accounts	151	151	487	487
Brokerage fees	766	597	1,105	1,105
E-commerce	-	-	1,721	1,721
Other	1,571	1,533	369	359
	5,918	5,200	10,110	9,598

9 Net gain/(loss) on financial assets at fair value through profit or loss

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Equity instruments	674	738	1,227	1,027
Debt securities	9	9	(117)	(54)
Other	(72)	(72)	(170)	(170)
	611	675	940	803

10 Net foreign exchange gain/(loss)

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Gain/(loss) from revaluation of financial assets and liabilities	1,218	25	(533)	378
Gain on spot transactions and derivatives	10,324	10,369	13,169	13,184
	11,542	10,394	12,636	13,562

11 Net realised gain/(loss) on financial assets at fair value through other comprehensive income

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Debt securities	1,562	1,562	(585)	(585)
	1,562	1,562	(585)	(585)

12 Other income/(expense)

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Rental income from operating leases	3,631	214	5,045	747
Fair value change of Investment property	279	(341)	(3,359)	(314)
Penalties received	2,221	1,896	1,424	1,122
(Written off)/Recovery of assets written off	(20)	355	313	313
Gain/(Loss) from sale of property and equipment	(3)	23	310	-
Gain /(Loss) from sale of Investment property	76	307	1,774	325
Dividends received	148	3,254	101	2,036
Gain/(Loss) from derecognition of subsidiary (note 44)	2,527	-	504	96
Negative goodwill write-off	156	-	-	-
Income from steel processing	2,592	-	3,187	-
Income from production of electricity and heating	-	-	697	-
Other	1,245	646	1,107	542
	12,852	6,354	11,103	4,867

Income from steel production, electricity and heating is generated by subsidiaries of the Group whose principal activity is manufacturing.

13 Impairment losses

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Impairment losses				
Loans and advances due from banks	(8)	(8)	(2)	(2)
Loans and receivables due from customers	(9,963)	(9,392)	(28,193)	(28,646)
Intangible assets	-	-	(53)	-
Financial assets at fair value through other comprehensive income	(567)	(567)	(225)	(225)
Debt securities at amortised cost	(111)	(111)	(29)	(29)
Investments in subsidiaries	-	(1)	-	(725)
Other non-financial assets	(809)	(702)	(114)	(73)
	(11,458)	(10,781)	(28,616)	(29,700)
Reversals of impairment losses				
Loans and advances due from banks	1	1	14	14
Loans and receivables due from customers	2,202	2,576	11,465	11,555
Financial assets at fair value through other comprehensive income	72	72	341	341
Debt securities at amortised cost	37	37	232	232
Other non-financial assets	16	11	72	72
	2,328	2,697	12,124	12,214
Net impairment losses	(9,130)	(8,084)	(16,492)	(17,486)

14 General and administrative expenses

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	<u>Group</u>	<u>Bank</u>	<u>Group</u>	<u>Bank</u>
Employee compensation	15,621	10,292	18,882	13,441
Salaries to Board of Directors and Council	2,332	1,824	1,977	1,295
Payroll related taxes on employee remuneration	4,305	2,907	4,898	3,529
Depreciation and amortisation	2,630	2,851	2,889	1,327
Repairs and maintenance	3,146	771	2,559	792
Taxes other than on corporate income and payroll	2,615	1,452	2,793	1,524
IT related costs	1,315	1,311	1,695	1,691
Rent	425	98	1,473	3,128
Representative offices	294	196	621	526
Advertising and marketing	879	190	837	161
Communications and information services	732	613	980	832
Travel expenses	791	376	1,158	627
Professional services	3,240	3,296	982	1,007
Provision for bonus and payroll related taxes	1,175	1,175	1,929	1,849
Representation	149	133	116	98
Charity and sponsorship	-	-	868	3
Credit card service	176	176	171	171
Insurance	297	201	289	216
Employee health insurance	173	160	193	185
Audit services	367	252	455	212
Subscription of information	211	211	236	236
Office supplies (Stationery)	79	21	92	30
Security	74	118	148	119
Other	2,839	2,029	3,061	1,227
Reversal of provisions for the management bonus	(4,714)	(4,714)	(96)	(96)
	<u>39,151</u>	<u>25,939</u>	<u>49,206</u>	<u>34,130</u>

The amount of reversed provision for bonuses represents the part of potential bonuses which, in addition to bonuses annually paid out by the Bank and the Group, might be paid discretionary by the Bank, subject to certain conditions.

Audit services includes fee in amount of EUR 7 thousand for other assurance engagements.

15 Income tax expense

(a) Income tax expense recognised in the profit and loss

	2019 '000 EUR	2019 '000 EUR	2018 '000 EUR	2018 '000 EUR
	Group	Bank	Group	Bank
Current tax expense				
Current tax expense	1,273	674	1,453	997
Deferred tax	237	-	(66)	-
Total income tax expense in the profit and loss	1,510	674	1,387	997

The tax rate applicable in countries in which group entities operate:	2019	2018
Latvia	20.00%	20.00%
Belarus	18.00%	18.00%
Cyprus	12.50%	12.50%
Russia	20.00%	20.00%

(b) Reconciliation of effective tax rate:

As of 1 January 2018, according Law on Enterprise Income Tax of the Republic of Latvia, the tax rate 20% is deferred to when the profit is distributed and calculated as 0.2/0.8 from net distributed dividend. Before 2018 corporate income tax in Latvia was payable for financial year taxable profit.

16 Cash and balances due from the Bank of Latvia

Cash and balances due from the Central Bank of Latvia comprised of the following items:

	31 Dec 2019 '000 EUR	31 Dec 2019 '000 EUR	31 Dec 2018 '000 EUR	31 Dec 2018 '000 EUR
	Group	Bank	Group	Bank
Cash	1,519	1,502	2,658	2,613
Balances due from the Bank of Latvia	501,570	501,570	463,832	463,831
	503,089	503,072	466,490	466,444

Deposits due from the Bank of Latvia represent the balance outstanding on the correspondent account due from the Bank of Latvia in EUR. This includes compulsory reserves.

In accordance with the Bank of Latvia's regulations, the Bank is required to maintain a compulsory reserve.

The compulsory reserve is compared to the Bank's average monthly correspondent account balance in EUR. The Bank's average correspondent balance should exceed the compulsory reserve requirement. The Bank was in compliance with the aforementioned compulsory reserve requirement during the reporting year.

17 Loans and receivables due from banks

	31 Dec 2019 '000 EUR	31 Dec 2019 '000 EUR	31 Dec 2018 '000 EUR	31 Dec 2018 '000 EUR
	<u>Group</u>	<u>Bank</u>	<u>Group</u>	<u>Bank</u>
Demand accounts				
Latvian commercial banks	155	-	258	-
Other OECD banks	61,818	61,818	65,567	65,567
Non-OECD banks	19,528	19,101	26,618	26,261
Expected credit losses	(8)	(8)	-	-
Total Demand accounts	81,493	80,911	92,443	91,828

Concentration of placements with banks

As at 31 December 2019 the Bank and the Group had 4 balances (2018: 3), which exceeded 10% of total loans and receivables from banks.

The largest balances due from credit institutions as of 31 December 2019 in the Bank and the Group were as follows:

	31 Dec 2019 '000 EUR	%
Erste Group Bank AG	35,729	44.15
ALFA Bank Closed JSC	14,256	16.46
Raiffeisenbank Bank International AG	13,323	14.44
Euroclear Bank SA	11,684	17.62
Total	74,992	92.67

The largest balances due from credit institutions as of 31 December 2018 in the Bank and the Group were as follows:

	31 Dec 2018 '000 EUR	%
Raiffeisenbank Bank International AG	44,160	48.09
Sberbank of Russia AO	18,761	20.43
Euroclear Bank SA	9,593	10.45
Total	72,514	78.97

18 Financial assets at fair value through profit or loss

	31 December		31 December	
	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Debt securities				
- with rating from AAA to A	-	-	635	-
- non-investment grade	-	-	968	968
Equity instruments	9,617	9,511	9,397	9,888
Derivative financial instruments	538	538	815	815
Financial assets at fair value through profit or loss	10,155	10,049	11,815	11,671
Derivative financial instruments	(94)	(94)	-	-
Financial liabilities at fair value through profit or loss	(94)	(94)	-	-

The Bank and the Group classify derivative financial instruments and trading portfolio under this category.

Derivative financial assets and liabilities

The Group	31 Dec 2019		31 Dec 2018	
	'000 EUR		'000 EUR	
	Carrying amount	Notional amount	Carrying amount	Notional amount
Assets				
Option premium	53	n/a	123	n/a
Forward contracts	3	242	-	-
Futures contracts	482	n/a	692	n/a
Total derivative financial assets	538		815	
Liabilities				
Forward contracts	94	11,338	-	-
Total derivative liabilities	94		-	

The Bank	31 Dec 2019		31 Dec 2018	
	'000 EUR		'000 EUR	
	Carrying amount	Notional amount	Carrying amount	Notional amount
Assets				
Option premium	53	n/a	123	n/a
Forward contracts	3	242	-	-
Futures contracts	482	n/a	692	n/a
Total derivative financial assets	538		815	
Liabilities				
Forward contracts	94	11,338	-	-
Total derivative liabilities	94		-	

19 Financial assets at amortised cost

19.1 Debt securities

	31 Dec 2019 '000 EUR	31 Dec 2019 '000 EUR	31 Dec 2018 '000 EUR	31 Dec 2018 '000 EUR
	Group	Bank	Group	Bank
- Corporate bonds				
European Union countries	53,395	53,395	35,537	35,537
Non-European Union countries	7,141	7,141	-	-
Total corporate debt securities	60,536	60,536	35,537	35,537

Analysis of movements in the allowance for expected credit losses:

31 December 2019

The Group and the Bank, EUR'000

	Opening balance as at 1 Jan 2019	Origination and acquisition	Derecognition and repayments	Changes in credit risk, net	Other adjustments	Closing balance as at 31 Dec 2019
Stage 1	590	30	(3)	5	-	622
Stage 2	-	-	-	34	(1)	33
Stage 3	-	4	-	4	-	8
Total	590	34	(3)	43	(1)	663

31 December 2018

The Group and the Bank, EUR'000

	Opening balance as at 1 Jan 2018	Origination and acquisition	Derecognition and repayments	Changes in credit risk, net	Other adjustments	Closing balance as at 31 Dec 2018
Stage 1	778	23	(154)	(53)	(4)	590
Stage 2	19	-	(19)	-	-	-
Total	797	23	(173)	(53)	(4)	590

19.2 Loans and receivables due from customers

	31 Dec 2019 '000 EUR Group	31 Dec 2019 '000 EUR Bank	31 Dec 2018 '000 EUR Group	31 Dec 2018 '000 EUR Bank
Companies				
Finance leases	23,628	-	28,442	-
Loans	436,116	594,885	482,177	662,320
Individuals				
Finance leases	11,309	-	8,797	-
Loans	128,729	73,836	170,091	119,694
Expected credit losses	(14,491)	(30,198)	(71,608)	(86,671)
Net Loans and receivables from customers	585,291	638,523	617,899	695,343

(a) Finance leases

Loans and receivables from customers include the following finance lease receivables for leases:

	31 Dec 2019 '000 EUR Group	31 Dec 2018 '000 EUR Group
Gross investment in finance leases, receivable		
Less than one year	20,462	21,192
More than one year	22,279	24,019
Total gross investment in finance leases	42,741	45,211
Unearned finance income	(7,804)	(7,972)
Net investment in finance lease before allowance	34,937	37,239
Expected credit losses	(237)	(318)
Net investment in finance lease	34,700	36,921
The net investment in finance leases comprises:		
Less than one year	16,207	16,727
Between one and five years	18,493	20,194
Net investment in finance lease	34,700	36,921

19.2 Loans and receivables due from customers, continued

(b) Credit quality of loan portfolio

(i) Ageing structure of loan portfolio

The Group, 31 Dec 2019

	Gross amount			Expected credit loss	Net carrying amount	Uncollateralised exposure of net carrying amount
	Stage 1	Stage 2	Stage 3			
Not past due and past due <= 30 days	407,094	6,327	50,235	(7,602)	456,054	104,021
Past due > 30 days <= 90 days	-	975	33,598	(572)	34,001	822
Past due > 90 days	-	-	101,553	(6,317)	95,236	2,742
Total	407,094	7,302	185,386	(14,491)	585,291	107,585

The Bank, 31 Dec 2019

	Gross amount			Expected credit loss	Net carrying amount	Uncollateralised exposure of net carrying amount
	Stage 1	Stage 2	Stage 3			
Not past due and past due <= 30 days	440,671	8,125	86,076	(24,935)	509,937	60,706
Past due > 30 days <= 90 days	-	550	33,453	(406)	33,597	522
Past due > 90 days	-	-	99,846	(4,857)	94,989	2,504
Total	440,671	8,675	219,375	(30,198)	638,523	63,732

The Group, 31 Dec 2018

	Gross amount			Expected credit loss	Net carrying amount	Uncollateralised exposure of net carrying amount
	Stage 1	Stage 2	Stage 3			
Not past due and past due <= 30 days	424,854	13,299	76,765	(22,093)	492,825	103,894
Past due > 30 days <= 90 days	-	13,132	521	(410)	13,243	2,400
Past due > 90 days	-	-	160,936	(49,105)	111,831	612
Total	424,854	26,431	238,222	(71,608)	617,899	106,906

19.2 Loans and receivables due from customers, continued

The Bank, 31 Dec 2018

EUR'000	Gross amount			Expected credit loss	Net carrying amount	Uncollateralised exposure of net carrying amount
	Stage 1	Stage 2	Stage 3			
Not past due and past due <= 30 days	477,468	19,287	112,503	(38,161)	571,097	60,421
Past due > 30 days <= 90 days	-	12,668	302	(237)	12,733	2,078
Past due > 90 days	-	-	159,786	(48,273)	111,513	367
Total	477,468	31,955	272,591	(86,671)	695,343	62,866

(ii) Analysis of loan portfolio by type of collateral

The following table provides the analysis of the loan portfolio, net of impairment, by main types of collateral as at 31 December 2019:

The Group

EUR'000	31 Dec 2019	% of loan portfolio	31 Dec 2018	% of loan portfolio
Commercial buildings	189,090	32.31	192,130	31.09
Commercial assets pledge	118,768	20.29	140,579	22.75
Traded securities	23,010	3.93	25,575	4.14
Mortgage on residential properties	38,118	6.51	53,764	8.70
Land mortgage	48,435	8.28	36,650	5.93
Without collateral	107,585	18.38	106,906	17.30
Other mortgage	23,560	4.03	24,272	3.93
Guarantee	1,588	0.27	-	-
Deposit	348	0.06	683	0.11
Non-traded securities	-	-	334	0.05
Other	89	0.01	85	0.01
Finance lease	34,700	5.93	36,921	5.99
Total	585,291	100.00	617,899	100.00

19.2 Loans and receivables due from customers, continued

The Bank

EUR'000	31 Dec 2019	% of loan portfolio	31 Dec 2018	% of loan portfolio
Commercial buildings	238,237	37.31	244,308	35.13
Commercial assets pledge	190,380	29.82	215,492	30.99
Traded securities	23,010	3.60	25,575	3.68
Mortgage on residential properties	38,118	5.97	53,950	7.76
Land mortgage	52,677	8.25	41,477	5.96
Without collateral	63,732	9.98	62,866	9.04
Other mortgage	30,342	4.75	50,573	7.27
Guarantee	1,588	0.25	-	-
Deposit	348	0.06	683	0.10
Non-traded securities	-	-	334	0.05
Other	91	0.01	85	0.02
Total	638,523	100.00	695,343	100.00

The amounts shown in the table's above represent the carrying amount of the loans, and not the fair value of the collateral.

19.2 Loans and receivables due from customers, continued

(iii) Movements in the expected credit losses

The following tables show reconciliation from the opening to the closing balance of the expected credit losses for the year 2019:

The Group

EUR'000

	Opening balance, 1 Jan 2019	Origination and acquisition	Disposals and repayments	Changes in credit risk, net	Decrease due to write-offs	Other adjustments	Closing balance, 31 Dec 2019
Stage 1	2,506	898	(600)	(805)	-	17	2,016
Stage 2	621	48	(67)	(428)	-	100	274
Stage 3	68,481	1,327	(182)	7,570	(64,810)	(185)	12,201
Total	71,608	2,273	(849)	6,337	(64,810)	(68)	14,491

The Bank

EUR'000

	Opening balance, 1 Jan 2019	Origination and acquisition	Disposals and repayments	Changes in credit risk, net	Decrease due to write-offs	Other adjustments	Closing balance, 31 Dec 2019
Stage 1	2,363	436	(263)	(906)	-	4	1,634
Stage 2	679	15	(5)	(512)	-	-	177
Stage 3	83,629	980	(173)	7,244	(63,544)	251	28,387
Total	86,671	1,431	(441)	5,826	(63,544)	255	30,198

Movements in the loan impairment allowance for the year ended 31 December 2018 are as follows:

The Group

EUR'000

	Opening balance, 1 Jan 2018	Origination and acquisition	Write-offs and repayments	Changes in credit risk, net	Other adjustments	Closing balance, 31 Dec 2018
Stage 1	3,836	3,333	(851)	(3,390)	(422)	2,506
Stage 2	551	-	(57)	(112)	239	621
Stage 3	77,404	1,894	(27,451)	16,141	493	68,481
Total	81,791	5,227	(28,359)	12,639	310	71,608

The Bank

EUR'000

	Opening balance, 1 Jan 2018	Origination and acquisition	Write-offs and repayments	Changes in credit risk, net	Other adjustments	Closing balance, 31 Dec 2018
Stage 1	3,965	2,717	(430)	(3,473)	(416)	2,363
Stage 2	576	-	(18)	(117)	238	679
Stage 3	91,895	1,805	(27,506)	16,940	495	83,629
Total	96,436	4,522	(27,954)	13,350	317	86,671

19.2 Loans and receivables due from customers, continued

(c) Industry analysis of the loan portfolio

	31 Dec 2019	31 Dec 2019	31 Dec 2018	31 Dec 2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Financial services	171,607	245,901	173,705	247,296
Real estate management	156,284	220,001	134,355	218,385
Individuals	123,126	70,482	161,311	112,459
Transport and communication	27,830	30,144	50,576	52,972
Wholesale and retailing	31,020	30,969	32,195	32,129
Investments in finance lease	34,700	-	36,921	-
Construction	1,185	1,173	980	965
Manufacturing	12,868	13,392	15,844	16,390
Tourism	719	713	1,110	1,110
Other	25,952	25,748	10,902	13,637
	585,291	638,523	617,899	695,343

(d) Geographical analysis of the loan portfolio

	31 Dec 2019	31 Dec 2019	31 Dec 2018	31 Dec 2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Latvia	212,343	257,418	177,202	249,082
Other OECD countries	174,049	174,024	178,415	178,316
Non-OECD countries	198,899	207,081	262,282	267,945
	585,291	638,523	617,899	695,343

(e) Significant credit exposures

According to regulatory requirements, the Bank and the Group are not allowed to have a credit exposure to one client or group of related clients more than 25% of its equity. As at 31 December 2019 and 2018 the Bank and the Group were in compliance with this requirement.

20 Financial assets at fair value through other comprehensive income

	2019 '000 EUR Group	2019 '000 EUR Bank	2018 '000 EUR Group	2018 '000 EUR Bank
Debt securities				
- with rating from AAA to A	111,097	111,097	72,461	72,461
- with rating from BBB+ to BBB-	104,896	104,896	44,998	44,998
- non-investment grade	74,436	74,436	41,946	41,946
- without rating	61	61	-	-
Total fair value	290,490	290,490	159,405	159,405
Acquisition cost	287,637	287,637	161,881	161,881
Revaluation	3,578	3,578	(2,246)	(2,246)
Impairment allowance	(725)	(725)	(230)	(230)
Total fair value	290,490	290,490	159,405	159,405

Analysis of movements in the allowance for expected credit losses:

31 December 2019

The Group and the Bank, EUR'000

	Opening balance, 1 Jan 2019	Origination and acquisition	Derecognition and repayments	Changes in credit risk, net	Other adjustments	Closing balance, 31 Dec 2019
Stage 1	230	290	(91)	59	-	488
Stage 2	-	2	(239)	474	-	237
Stage 3	-	12	-	(12)	-	-
Total	230	304	(330)	521	-	725

31 December 2018

The Group and the Bank, EUR'000

	Opening balance, 1 Jan 2018	Origination and acquisition	Derecognition and repayments	Changes in credit risk, net	Other adjustments	Closing balance, 31 Dec 2018
Stage 1	267	203	(260)	26	(6)	230
Stage 2	89	-	(66)	(19)	(4)	-
Total	356	203	(326)	7	(10)	230

21 Investments in subsidiaries

Investment in subsidiaries at 31 December 2019 (‘000 EUR):

Company	Address	Share Capital	Equity	Bank's share of total share capital, %	Gross carrying amount
RB Investments SIA	Vesetas str.7, Riga, Latvia	14,229	10,594	100%	14,228
RB Securities Ltd	Stasinou str.1, Mitsi Building 1, 2 nd floor, Flat/office 5, Plateia Eleftherias, P.C.1060, Nicosia, Cyprus	11,602	2,970	99.99%	10,956
Overseas Estates SIA	Vesetas str.7, Riga, Latvia	9,480	1,420	100%	7,346
Rietumu Asset Management IPS	Vesetas str.7, Riga, Latvia	500	952	100%	500
Rietumu Leasing Ltd	Odoevskogo str.117, 6 th floor, office 9, Minsk, Belarus	275	4,902	99.5%	2,362
InCREDIT GROUP SIA	Krisjana Barona str.130, Riga, Latvia	500	7,972	51%	255
RB Drosiba SIA	Vesetas str.7, Riga, Latvia	71	193	100%	71
Vesetas 7 SIA	Vesetas str.7, Riga, Latvia	142	9,048	100%	3,263
Rietumu Bankas Labdaribas Fonds	Vesetas str.7, Riga, Latvia	-	2,602	100%	-
Euro Textile Group SIA	Ganibu dambis str. 30, Riga, Latvia	887	(1,037)	100%	1,000
Rietumu Jazz SIA	Vesetas str.7, Riga, Latvia	3	1	100%	3
Aristida Briana 9 SIA	Aristida Briana str. 9, Riga, Latvia	558	78	100%	112
Lilijas 28 SIA	Vesetas str. 7, Riga, Latvia	182	293	100%	620
KI FUND SIA	Vesetas str. 7, Riga, Latvia	5,719	3,778	100%	5,719
Impairment allowance					(16,969)
Total Bank's investment in subsidiaries, net					29,466

21 Investments in subsidiaries, continued

Investment in subsidiaries at 31 December 2018 ('000 EUR):

Company	Address	Share Capital	Equity	Bank's share of total share capital, %	Gross carrying amount
RB Investments SIA	Vesetas str.7, Riga, Latvia	14,229	9,724	100%	14,228
RB Securities Ltd	Stasinou str.1, Mitsi Building 1, 2 nd floor, Flat/office 5, Plateia Eleftherias, P.C.1060, Nicosia, Cyprus	11,211	2,999	99.99%	10,956
Overseas Estates SIA	Vesetas str.7, Riga, Latvia	9,480	541	100%	7,346
Rietumu Asset Management IPS	Vesetas str.7, Riga, Latvia	500	906	100%	500
Rietumu Leasing Ltd	Odoevskogo str.117, 6 th floor, office 9, Minsk, Belarus	275	4,602	99.5%	2,362
InCREDIT GROUP SIA	Krisjana Barona str.130, Riga, Latvia	500	7,510	51%	255
RB Drosiba SIA	Vesetas str.7, Riga, Latvia	71	158	100%	71
Vesetas 7 SIA	Vesetas str.7, Riga, Latvia	142	7,735	100%	3,263
Rietumu Bankas Labdaribas Fonds	Vesetas str.7, Riga, Latvia	-	3,734	100%	-
Euro Textile Group SIA	Ganibu dambis str. 30, Riga, Latvia	887	(888)	100%	1,000
Rietumu Jazz SIA	Vesetas str.7, Riga, Latvia	3	1	100%	3
Aristida Briana 9 SIA	Aristida Briana str. 9, Riga, Latvia	558	13	100%	112
Lilijas 28 SIA	Vesetas str. 7, Riga, Latvia	182	640	100%	620
Vangazu Nekustamie ipasumi SIA	Gaujas str. 24/34, Vangazi, Incukalna region, Latvia	4,398	3,343	100%	3,357
KI FUND SIA	Vesetas str. 7, Riga, Latvia	5,719	4,721	100%	5,719
Impairment allowance					(16,983)
Total Bank's investment in subsidiaries, net					32,809

21 Investments in subsidiaries, continued

Movements in the impairment allowance

Movements in the investment in subsidiaries impairment allowance for the year ended 31 December 2019 and 2018 are as follows:

	2019	2018
	'000 EUR	'000 EUR
	Bank	Bank
Allowance for impairment		
Balance at 1 January	16,983	16,380
Charge for the year	1	725
Sales of subsidiary	-	(122)
Liquidation of subsidiary	(15)	-
Balance at 31 December	16,969	16,983

22 Equity accounted investees

The Group owns a share in the following associates, both associated companies provide information services and their assets consist mainly from property and equipment for their operations. The total assets and revenues are not material to the Group.

Name	Country of incorporation	Principal activities	Ownership %	Amount of investment	Ownership %	Amount of investment
				31 December 2019	31 December 2018	
				'000 EUR		'000 EUR
AED Rail Service SIA	Latvia	Railway information services	43.00%	4	43.00%	32
Dzelzcelu Tranzits SIA	Latvia	Railway information services	49.12%	-	49.12%	-
Total				4		32

23 Property and equipment

The Group

Cost/Revalued amount '000 EUR	Land and buildings	Construction in progress	Vehicles	Office equipment and machinery	Advances	Total
At 1 January 2019	38,046	4,178	2,708	21,181	230	66,343
Additions	-	548	138	325	20	1,031
Disposals	(56)	(26)	(222)	(501)	-	(805)
Transfers	-	(23)	-	147	(124)	-
Sale of subsidiary	(900)	-	-	(4,059)	(105)	(5,064)
Reclassification to investment property	-	(4,175)	-	-	-	(4,175)
Revaluation	(10)	-	-	-	-	(10)
FX translation effect	79	69	2	2	-	152
Introduction of IFRS 16	2,533	-	-	-	-	2,533
At 31 December 2019	39,692	571	2,626	17,095	21	60,005
Depreciation						
At 1 January 2019	6,784	-	1,815	14,872	-	23,471
Depreciation charge	1,129	-	332	622	-	2,083
Disposals	(70)	-	(215)	(479)	-	(764)
Adjustment	-	-	112	-	-	112
Sale of subsidiary	(386)	-	-	(2,981)	-	(3,367)
Transfer	-	7	-	(7)	-	-
FX translation effect	53	-	(3)	(4)	-	46
At 31 December 2019	7,510	7	2,041	12,023	-	21,581
Net carrying amount						
At 31 December 2019	32,182	564	585	5,072	21	38,424
At 31 December 2018	31,262	4,178	893	6,309	230	42,872

23 Property and equipment, continued

The Group, continued

Cost/Revalued amount '000 EUR	Land and buildings	Construction in progress	Vehicles	Office equipment and machinery	Advances	Total
At 1 January 2018	38,041	2,510	2,843	21,684	129	65,207
Additions	3	1,165	283	333	114	1,898
Disposals	(32)	(2)	(429)	(829)	(2)	(1,294)
Transfers	-	11	-	-	(11)	-
Sale of subsidiary	-	-	-	(3)	-	(3)
Reclassification from investment property	-	567	-	-	-	567
Revaluation	73	-	-	-	-	73
FX translation effect	(39)	(73)	11	(4)	-	(105)
At 31 December 2018	38,046	4,178	2,708	21,181	230	66,343
Depreciation						
At 1 January 2018	6,029	-	1,780	14,438	-	22,247
Depreciation charge	783	-	397	1,159	-	2,339
Disposals	-	-	(362)	(721)	-	(1,083)
Sale of subsidiary	-	-	-	(2)	-	(2)
FX translation effect	(28)	-	-	(2)	-	(30)
At 31 December 2018	6,784	-	1,815	14,872	-	23,471
Net carrying amount						
At 31 December 2018	31,262	4,178	893	6,309	230	42,872
At 31 December 2017	32,012	2,510	1,063	7,246	129	42,960

23 Property and equipment, continued

Revalued assets

As at 31 December 2019 and 2018, properties consisting of office buildings and land were revalued based on report by external independent and qualified property appraisers with recent experience in the location and category of the property being valued. The independent appraisers provide the fair value of the property portfolio every year.

The fair value measurement for property (land and buildings) has been categorised as a Level 3 in the fair value hierarchy.

The following table shows the valuation techniques used in measuring the fair value of the significant items of property, as well as the significant unobservable inputs used. The remaining items of properties belonging to the subsidiaries of the Group are considered to be not significant for the Bank and the Group.

Type	Valuation technique	Significant unobservable inputs	Inter-relation between significant unobservable inputs and fair value measurement
Office premises in administrative building in the net carrying amount of EUR 571 thousand (2018: EUR 555 thousand) located in Minsk, Belarus	Market comparison technique: The fair value was based on results of comparable sales of similar buildings	Price per m ² – 893 EUR (2018: EUR 868)	The fair value would increase (decrease) if the price per m ² was higher (lower).
Office building (17,071 m ²) and land in the amount of EUR 29,471 thousand (2018: EUR 30,190 thousand) located in Riga, Latvia	Discounted cash flows technique: The model is based on discounted cash flows from rental income.	Rental income per m ² of EUR 13 (2018: EUR 12-20) Discount rate of 6.5 % (2018: 6.5%)	The estimated fair value would increase (decrease) if: <ul style="list-style-type: none"> - Rental income per m² was higher (lower) - The discount rate was lower (higher) - Annual capital expense are lower (higher) - The occupancy rate was higher (lower)

23 Property and equipment, continued

The Bank

'000 EUR	Land and buildings	Construction in progress	Vehicles	Office equipment	Advances	Total
Cost/Revalued amount						
1 January 2019	-	3,518	2,572	12,339	124	18,553
Additions	-	533	134	166	20	853
Disposals	-	-	(215)	(100)	-	(315)
Transfers	-	124	-	-	(124)	-
Reclassification to investment property	-	(4,175)	-	-	-	(4,175)
Introduction of IFRS 16	32,015	-	-	-	-	32,015
At 31 December 2019	32,015	-	2,491	12,405	20	46,931
Depreciation and impairment losses						
At 1 January 2019	-	-	1,740	8,427	-	10,167
Depreciation charge	1,711	-	318	279	-	2,308
Disposals	-	-	(215)	(95)	-	(310)
Adjustment	-	-	112	-	-	112
At 31 December 2019	1,711	-	1,955	8,611	-	12,277
Net carrying amount						
At 31 December 2019	30,304	-	536	3,794	20	34,654
At 31 December 2018	-	3,518	832	3,912	124	8,386

'000 EUR	Construction in progress	Vehicles	Office equipment	Advances	Total
Cost/Revalued amount					
1 January 2018	2,484	2,721	12,792	129	18,126
Additions	1,023	274	107	9	1,413
Disposals	-	(423)	(560)	(2)	(985)
Transfers	11	-	-	(12)	(1)
At 31 December 2018	3,518	2,572	12,339	124	18,553
Depreciation and impairment losses					
At 1 January 2018	-	1,713	8,509	-	10,222
Depreciation charge	-	384	461	-	845
Disposals	-	(357)	(543)	-	(900)
At 31 December 2018	-	1,740	8,427	-	10,167
Net carrying amount					
At 31 December 2018	3,518	832	3,912	124	8,386
At 31 December 2017	2,484	1,008	4,283	129	7,904

24 Intangible assets

The Group

'000 EUR	Goodwill	Software	Other	Advances	Total
Cost amount					
At 1 January 2019	1,069	13,197	1,532	754	16,552
Additions	-	-	21	119	140
Disposals	-	-	(6)	-	(6)
Sale of subsidiary	-	-	(1,488)	-	(1,488)
Transfers	-	139	-	(139)	-
At 31 December 2019	1,069	13,336	59	734	15,198
Amortisation and impairment losses					
At 1 January 2019	-	12,531	1,182	-	13,713
Amortisation charge	-	539	8	-	547
Disposals	-	-	(6)	-	(6)
Sale of subsidiary	-	-	(1,148)	-	(1,148)
At 31 December 2019	-	13,070	36	-	13,106
Net carrying amount					
At 31 December 2019	1,069	266	23	734	2,092
At 31 December 2018	1,069	666	350	754	2,839

'000 EUR	Goodwill	Software	Other	Advances	Total
Cost amount					
At 1 January 2018	1,069	12,979	1,573	1,032	16,653
Additions	53	411	-	33	497
Disposals	-	(485)	(1)	(19)	(505)
Write off	(53)	-	-	-	(53)
Reclassification from other assets	-	292	(40)	(292)	(40)
At 31 December 2018	1,069	13,197	1,532	754	16,552
Amortisation and impairment losses					
At 1 January 2018	-	12,501	1,110	-	13,611
Amortisation charge	-	477	73	-	550
Disposals	-	(447)	(1)	-	(448)
Impairment write off	(53)	-	-	-	(53)
Impairment loss	53	-	-	-	53
At 31 December 2018	-	12,531	1,182	-	13,713
Net carrying amount					
At 31 December 2018	1,069	666	350	754	2,839
At 31 December 2017	1,069	478	463	1,032	3,042

Goodwill of EUR 1,069 thousand (2018: EUR 1,069 thousand) originated on the acquisition of a payment card business unit in 2001.

24 Intangible assets, continued

The Bank

'000 EUR	Goodwill	Software	Other	Advances	Total
Cost amount					
At 1 January 2019	1,069	13,411	40	45	14,565
Additions	-	-	-	119	119
Disposals	-	-	(6)	-	(6)
Transfers	-	138	2	(140)	-
At 31 December 2019	1,069	13,549	36	24	14,678
Amortisation and impairment losses					
At 1 January 2019	-	12,037	30	-	12,067
Amortisation charge	-	538	5	-	543
Disposals	-	-	(6)	-	(6)
At 31 December 2019	-	12,575	29	-	12,604
Net carrying amount					
At 31 December 2019	1,069	974	7	24	2,074
At 31 December 2018	1,069	1,374	10	45	2,498
'000 EUR	Goodwill	Software	Other	Advances	Total
Cost amount					
At 1 January 2018	1,069	13,192	81	322	14,664
Additions	-	411	-	33	444
Disposals	-	(484)	(1)	(19)	(504)
Transfers	-	292	(40)	(291)	(39)
At 31 December 2018	1,069	13,411	40	45	14,565
Amortisation and impairment losses					
At 1 January 2018	-	12,006	26	-	12,032
Amortisation charge	-	477	5	-	482
Disposals	-	(446)	(1)	-	(447)
At 31 December 2018	-	12,037	30	-	12,067
Net carrying amount					
At 31 December 2018	1,069	1,374	10	45	2,498
At 31 December 2017	1,069	1,186	55	322	2,632

Goodwill of EUR 1,069 thousand (2018: EUR 1,069 thousand) originated on the acquisition of a payment card business unit in 2001.

25 Right-of-use assets and Lease liabilities

Property and equipment comprise owned and leased assets that do not meet the definition of investment property.

	31 December 2019 '000 EUR	31 December 2019 '000 EUR
	Group	Bank
Property and equipment owned	36,289	4,350
Right-of-use assets	2,135	30,304
Total	38,424	34,654

The Group and the Bank leases land and buildings. Information about leases for which the Group is a lessee is presented below.

Right-of-use assets

	31 December 2019 Land and buildings '000 EUR	31 December 2019 Land and buildings '000 EUR
	Group	Bank
Balance at 1 January	2,533	32,015
Depreciation charge for the period	(398)	(1,711)
Balance at 31 December 2019	2,135	30,304

Lease liabilities

Lease liability is included in the position Other liabilities and accruals. For maturity analysis of contractual undiscounted cash flows see note 4 (d).

Amounts recognized in profit or loss

	31 December 2019 '000 EUR	31 December 2019 '000 EUR
	Group	Bank
Interest expense on lease liabilities	112	1,143
Depreciation charge	398	1,711
Total	510	2,854

26 Investment property

Investment property comprises residential properties and commercial properties, such as land or parts of buildings, and premises owned by the Group companies, which the Group does not occupy.

	31 Dec 2019	31 Dec 2019	31 Dec 2018	31 Dec 2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Balance at 1 January	84,373	9,343	90,178	10,470
Sale of subsidiary	(2,117)	-	(1,105)	-
Acquisition of subsidiary	1,322	-	-	-
Transferred from other assets	-	-	388	-
Transferred from loans	-	23,335	-	-
Transferred from property and equipment	4,175	4,175	-	-
Transferred to Non-current assets held for sale	(596)	(596)	(2,759)	-
Transferred to property and equipment	-	-	(494)	-
Additions	7,959	75	7,912	24
Disposals/Sales	(5,984)	(877)	(5,569)	(837)
Revaluations	279	(341)	(3,359)	(314)
Currency revaluation	648	-	(819)	-
Balance at 31 December	90,059	35,114	84,373	9,343

Rental income and operating expense for the year ended 31 December 2019, the Group:

	Carrying amount	Rental income	Operating expenses
	'000 EUR	'000 EUR	'000 EUR
Investment property rented out	45,672	3,631	1,644
Investment property held for value appreciation	44,387	-	748
Total	90,059	3,631	2,392

Rental income and operating expense for the year ended 31 December 2018, the Group:

	Carrying amount	Rental income	Operating expenses
	'000 EUR	'000 EUR	'000 EUR
Investment property rented out	44,459	4,586	2,429
Investment property held for value appreciation	39,914	-	379
Total	84,373	4,586	2,808

Rental income and operating expenses are presented under Other income (Other expenses) in the statements of profit or loss.

All investment properties represent Level 3 fair value hierarchy.

26 Investment property, continued

The following table shows the valuation technique used in measuring fair value of investment property of the Group and significant unobservable inputs used as at 31 December 2019:

Type	Valuation technique	Significant unobservable inputs	Carrying amount ‘000 EUR
Residential property	Market comparison technique: The fair value was based on results of comparable sales of similar properties	Average price per m ² *	
- Riga		EUR 1,390 – 2,516	8,996
- Jurmala		EUR 902 – 2,479	3,653
- Other areas in Latvia		EUR 919 – 1,488	8,007
Land	Market comparison technique: The fair value was based on results of comparable sales of similar land plots	Average price per m ² *	
- Riga		EUR 3 – 70	5,249
- Jurmala		EUR 7 – 63	1,544
- Other areas in Latvia		EUR 0.3 – 23	7,470
Commercial property	Market comparison technique: The fair value was based on results of comparable sales of similar properties	Average price per m ² *	
- Riga		EUR 276 – 1,485	19,791
- Other areas in Latvia		EUR 67 – 204	255
- Belarus		EUR 549	
- Moscow, Russia		EUR 1,664-3,550	801
- Riga region	Discounted cash flows technique: The model is based on discounted cash flows from rental income	Rental income per m ² EUR 4.5 Annual discount rate of 6%	8,524 2,321
Commercial property	Market comparison technique: The fair value was based on results of comparable sales of similar properties	Average price per m ² for renovated premises*	8,619
- Residential and commercial premises (Riga)		EUR 2,300-2,500 Rental income per m ² EUR 3.5- 4.75 Annual discount rate of 7%	
- Hotels (Latvia)	Discounted cash flows technique: The model is based on discounted cash flows from rental income	Annual discount rate of 8.5-9.5% EUR 35 – 250 income per hotel room The occupancy rate increasing over time from 37% to 60%	7,158
- Terminal (Ventspils)	Discounted cash flows technique: The model is based on discounted cash flows from transshipment, storage and blending of palm oil products	Income from palm oil products transshipment 12.59 EUR / t. Transshipment volume limit up to 200 thousand tons per year. Annual discount rate of EBITDA 12.7%. Capitalization rate 10.7%.	4,140
- Residential, office and shop premises (Riga)	Market comparison technique: The fair value was based on results of comparable sales of similar properties	Average sales price per m ² * EUR 677-989	3,531
Total			90,059

* sales prices are market prices for similar properties adjusted for certain criteria such as land plot footage adjustment, location area adjustment, property condition, offer price adjustment, resulting in the significant unobservable inputs.

26 Investment property, continued

The following table shows the valuation technique used in measuring fair value of investment property of the Group and significant unobservable inputs used as at 31 December 2018:

Type	Valuation technique	Significant unobservable inputs	Carrying amount ‘000 EUR
Residential property	Market comparison technique: The fair value was based on results of comparable sales of similar properties	Average price per m ² *	
- Riga		EUR 840 – 1,700	6,851
- Jurmala		EUR 1,110 – 3,300	3,686
- Other areas in Latvia		EUR 400 – 1,500	6,359
- Moscow, Russia		EUR 3,354 – 6,635	1,740
Land	Market comparison technique: The fair value was based on results of comparable sales of similar land plots	Average price per m ² *	
- Riga		EUR 10 – 100	6,644
- Jurmala		EUR 15 – 60	1,789
- Other areas in Latvia		EUR 0.1 – 30	11,236
Commercial property	Market comparison technique: The fair value was based on results of comparable sales of similar properties	Average price per m ² *	
- Riga		EUR 276 – 1,485	21,016
- Other areas in Latvia		EUR 67 – 204	129
- Belarus		EUR 538	784
- Moscow, Russia		EUR 2,000-2,280	3,200
- Riga region		Discounted cash flows technique: The model is based on discounted cash flows from rental income	Rental income per m ² EUR 5 Annual discount rate of 10%
Commercial property	Market comparison technique: The fair value was based on results of comparable sales of similar properties	Average price per m ² for renovated premises*	7,297
- Residential and commercial premises (Riga)		EUR 1,950-2,467	
- Hotels (Latvia)	Discounted cash flows technique: The model is based on discounted cash flows from rental income	Annual discount rate of 7% EUR 45 – 241 income per hotel room The occupancy rate increasing over time from 37% to 58%	4,968
- Terminal (Ventspils)	Discounted cash flows technique: The model is based on discounted cash flows from transshipment, storage and blending of palm oil products	Income from palm oil products transshipment 13.88 EUR / t. Transshipment volumes 100 – 160 thousand tons per year. Annual discount rate of EBITDA 13%. Capitalization rate 11.3%.	4,140
- Residential, office and shop premises (Riga)	Market comparison technique: The fair value was based on results of comparable sales of similar properties	Average sales price per m ² * EUR 1,862-2,166	3,164
Total			84,373

* sales prices are market prices for similar properties adjusted for certain criteria such as land plot footage adjustment, location area adjustment, property condition, offer price adjustment, resulting in the significant unobservable inputs.

27 Other assets

	31 Dec 2019 '000 EUR	31 Dec 2019 '000 EUR	31 Dec 2018 '000 EUR	31 Dec 2018 '000 EUR
	Group	Bank	Group	Bank
<i>Other financial assets</i>				
Cash in transit	27,238	27,199	20,019	19,936
Other	48	20	75	27
<i>Other non-financial assets</i>				
Collateral assumed on non-performing loans	2,387	2,387	4,160	4,160
Prepayments	1,725	436	791	495
Recoverable VAT	2,328	-	4,086	-
Other debtors	3,225	1,171	2,875	1,887
Other	6,289	3,980	5,690	3,131
Impairment allowance	(2,354)	(2,128)	(3,649)	(3,331)
	40,886	33,065	34,047	26,305

Impairment allowance as at 31 December 2019 and 2018 is recognized mainly for receivables - other debtors and collateral assumed on non-performing loans. Assets classified as collateral assumed on non-performing loans in the amount of EUR 2,387 thousand by the Group (2018: EUR 4,160 thousand) and EUR 2,387 thousand by the Bank (2018: EUR 4,160 thousand), represent repossessed loan collateral. Collateral assumed on non-performing loans are initially recognised at take-over value which set to be a notional cost. Subsequently, management has determined a recoverable amount which was fair value less cost to sell as at 31 December 2019 using market data. After the acquisition of the collateral and unless all legal titles are transferred to the Group and the Bank, the Group and the Bank do not define classification of the collateral, whether it should be investment property, property, plant and equipment or non-current asset held for sale, therefore the collateral is part of other assets.

Analysis of movements in the value of collateral assumed on non-performing loans

	2019 '000 EUR	2019 '000 EUR	2018 '000 EUR	2018 '000 EUR
	Group	Bank	Group	Bank
Balance at 1 January	4,160	4,160	4,643	4,255
Addition	204	204	-	-
Sale of collateral completed	(80)	(80)	(95)	(95)
Reclassified to investment property	-	-	(388)	-
Written off	(1,897)	(1,897)	-	-
Balance at 31 December	2,387	2,387	4,160	4,160
Impairment allowance	(1,910)	(1,910)	(3,116)	(3,116)
Recoverable amount at 31 December	477	477	1,044	1,044

27 Other assets, continued

Analysis of movements in the impairment allowance

	2019	2019	2018	2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Balance at 1 January	3,649	3,331	3,912	3,521
Charge for the year	809	702	114	73
Recovery	(16)	(11)	(72)	(72)
Acquisition of subsidiaries	4	-	(1)	-
Written off	(2,096)	(1,897)	(311)	(199)
Currency revaluation	4	3	7	8
Balance at 31 December	2,354	2,128	3,649	3,331

28 Deposits and balances due to banks

	31 Dec 2019	31 Dec 2019	31 Dec 2018	31 Dec 2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Vostro demand accounts	2,920	2,920	2,348	2,348
Term deposits	-	-	55	-
	2,920	2,920	2,403	2,348

Concentration of deposits and balances due to banks

As at 31 December 2019 the Bank and the Group had balances with four clients (three as at 31 December 2018), which exceeded 10 % of total deposits and balances from banks. The gross value of these balances as of 31 December 2019 was EUR 941 thousand, EUR 830 thousand, EUR 663 thousand and EUR 344 thousand accordingly (2018: EUR 1,222 thousand, EUR 360 thousand and EUR 245 thousand).

29 Current accounts and deposits due to customers

	31 Dec 2019 '000 EUR	31 Dec 2019 '000 EUR	31 Dec 2018 '000 EUR	31 Dec 2018 '000 EUR
	Group	Bank	Group	Bank
Private companies				
- current accounts	448,007	463,438	331,556	348,078
- term deposits	32,978	32,556	41,368	40,810
Total private companies	480,985	495,994	372,924	388,888
Government				
- current accounts	45	45	29	29
- term deposits	13	-	21	-
Total government	58	45	50	29
Private individuals				
- current accounts	254,557	254,557	251,440	251,440
- term deposits	584,233	581,933	395,282	393,182
Total private individuals	838,790	836,490	646,722	644,622
Total current accounts and deposits due to customers	1,319,833	1,332,529	1,019,696	1,033,539

(a) Geographical analysis

	31 Dec 2019 '000 EUR	31 Dec 2019 '000 EUR	31 Dec 2018 '000 EUR	31 Dec 2018 '000 EUR
	Group	Bank	Group	Bank
Latvia	284,363	289,916	159,817	170,320
Other OECD countries	588,430	595,766	366,807	370,305
Non-OECD countries	447,040	446,847	493,072	492,914
	1,319,833	1,332,529	1,019,696	1,033,539

(b) Concentrations of current accounts and customer deposits

As of 31 December 2019 and 2018, the Bank and the Group had no customers, whose balances exceeded 10% of total customer accounts.

(c) Subordinated deposits

As of 31 December 2019 the Bank and the Group had subordinated deposits of EUR 64,640 thousand (2018: EUR 77,944 thousand).

30 Issued debt securities

On 1th October 2018 Rietumu Leasing Ltd issued unsecured bonds with maturity of three years and interest payments quarterly.

	2019 '000 EUR Group	2018 '000 EUR Group
Balance at 1 January	62	-
<i>Change from financing cash flows</i>		
Issued debt securities	650	62
Total changes from financing cash flows	650	62
Balance at 31 December	712	62

31 Other liabilities and accruals

	31 Dec 2019 '000 EUR Group	31 Dec 2019 '000 EUR Bank	31 Dec 2018 '000 EUR Group	31 Dec 2018 '000 EUR Bank
<i>Other financial liabilities</i>				
Management bonus accrual	3,545	3,532	7,075	7,071
Deposits guarantee fund	436	436	290	290
Estimated liability for FCMC	203	203	136	136
Dividends payable	416	416	24	6
Lease liability	2,262	30,840	-	-
Cash in transit	-	-	8	-
Other	638	207	341	341
<i>Other non-financial liabilities</i>				
Deferred income	3,783	490	3,615	615
Annual leave accrual	1,483	1,020	1,747	1,380
VAT payable	374	260	294	189
Prepayments	378	263	1,263	71
Accounts payable to suppliers	3,591	212	6,676	2,815
Accrued liabilities	2,724	2,144	2,872	1,875
Other	1,617	1,234	653	81
	21,450	41,257	24,994	14,870

32 Deferred tax asset and liability

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

These taxable and tax deductible temporary differences, which have no expiry dates, are listed below at their tax affected accumulated values:

The Group

	Assets		Liabilities		Net	
	2019	2018	2019	2018	2019	2018
'000 EUR						
Property and equipment	145	142	(22)	-	123	142
Investment property	63	-	(305)	(189)	(242)	(189)
Other assets	179	255	(72)	-	107	255
Other liabilities	30	3	(10)	(84)	20	(81)
Total recognised deferred tax assets/(liabilities)	417	400	(409)	(273)	8	127
Recognised deferred tax					8	127

The rate of tax applicable for deferred taxes equals tax rates applicable in countries in which subsidiaries operate, as disclosed in Note 15.

Movement in temporary differences during the year ended 31 December 2019

The Group	2019 '000 EUR	2018 '000 EUR
Balance at 1 January – deferred tax liability	(46)	(426)
Balance at 1 January – deferred tax asset	173	37
Charge to profit for the year	(237)	66
Acquisition of subsidiary	85	-
Transfer to Revaluation reserve	-	474
Currency revaluation	33	(24)
Balance at 31 December	8	127
Deferred tax asset	107	173
Deferred tax liability	(99)	(46)

Deferred tax asset and liability are shown net on individual subsidiaries level, but are not netted on the Group level.

33 Share capital and reserves

(a) Issued capital and share premium

In June 2019, the Bank's Shareholders decided to terminate non-voting preference shares and replace them with B category dematerialized registered non-voting shares and to approve the Bank's Statutes in a new wording.

The largest shareholders of the Bank as of 31 December 2019 are as follows:

	2019	
	'000 EUR	%
A category registered shares		
<i>Companies non-residents</i>		
Boswell (International) Consulting Limited	47,111	33.11%
<i>Companies residents</i>		
Esterkin Family Investments Ltd	47,125	33.12%
Suharenko Family Investments Ltd	24,665	17.34%
Other	1,579	1.10%
<i>Private persons</i>		
Others	21,807	15.33%
A category registered shares, total	142,287	100%
B category registered shares		
Companies	13,616	
Private persons	13,013	
B category registered shares, total	26,629	
Issued capital	168,916	
Share premium	52,543	

The ultimate controlling parties of the Bank are Esterkin Family Investments Ltd, Boswell (International) Consulting Limited and Suharenko Family Investments Ltd.

The holders of A category registered shares are entitled to receive dividends as declared from time to time and are entitled to one vote per share at annual and general meetings of the Bank and to residual assets.

B category registered shares are non-voting shares, but its holders also are entitled to receive dividends as declared from time to time.

33 Share capital and reserves, continued

The largest shareholders of the Bank as of 31 December 2018:

	2018 '000 EUR	%
Ordinary shares		
<i>Companies non-residents</i>		
Boswell (International) Consulting Limited	47,111	33.11%
<i>Companies residents</i>		
Esterkin Family Investments Ltd	47,125	33.12%
Suharenko Family Investments Ltd	24,665	17.34%
Other	1,579	1.10%
<i>Private persons</i>		
Others	21,807	15.33%
Ordinary shares, total	142,287	100%
Preference shares		
Companies	9,515	
Private persons	17,114	
Preference shares, total	26,629	
Issued capital	168,916	
Share premium	52,543	

Preference shares are shares which have preference over ordinary shares for payment of dividend. The dividend is defined as percentage of issuance price and if not paid, it is accumulated. It is upon Bank's discretion to delay the dividend payments indefinitely. Preference share shareholders do have voting rights if dividends are not received or are partly received for two consecutive years.

(b) Dividends

During reporting period dividends for the previous period were paid in amount of EUR 173,995 thousand (2018: EUR 12,729 thousand). Dividends are proportionately divided between ordinary and preference shares, or A category and B category shares.

	2019 '000 EUR Group	2019 '000 EUR Bank	2018 '000 EUR Group	2018 '000 EUR Bank
<i>Change from financing cash flows</i>				
Dividend paid	173,995	173,995	12,729	12,729
Dividends paid to non-controlling interest shareholders	1,713	-	1,225	-
Total changes from financing cash flows	175,708	173,995	13,954	12,729

(c) Other reserves

Out of all Other reserves those amounting to EUR 23 thousand at the Bank (2018: EUR 23 thousand) represent contributions made by shareholders in previous years.

(d) Fair value reserve

The fair value reserve represents the changes in fair value of financial assets at fair value through other comprehensive income.

33 Share capital and reserves, continued

Movements in fair value reserve

Movements in the fair value reserve net of tax for the year ended 31 December 2019 and 2018 are as follows:

	2019 '000 EUR	2019 '000 EUR	2018 '000 EUR	2018 '000 EUR
	Group	Bank	Group	Bank
Balance at 1 January	(2,246)	(2,246)	3,409	3,976
Effect from changed accounting policy - IFRS 9	-	-	(1,941)	(2,508)
Revaluation during the period	5,329	5,329	(3,598)	(3,598)
Change in expected credit losses during the period	495	495	(116)	(116)
Balance at 31 December	3,578	3,578	(2,246)	(2,246)

(e) Revaluation reserve

A revaluation reserve represents the increase in the fair value of real estate properties classified under Property and equipment.

	2019 '000 EUR	2019 '000 EUR	2018 '000 EUR	2018 '000 EUR
	Group	Bank	Group	Bank
Revaluation reserve as at 1 January	1,914	-	1,381	-
Transfer to retained earnings	(27)	-	(27)	-
Revaluation of property and equipment	3	-	86	-
Transfer from Deferred tax	-	-	474	-
Revaluation reserve as at 31 December	1,890	-	1,914	-

34 Cash and cash equivalents

Cash and cash equivalents consist of the following:

	31 Dec 2019 '000 EUR	31 Dec 2019 '000 EUR	31 Dec 2018 '000 EUR	31 Dec 2018 '000 EUR
	Group	Bank	Group	Bank
Cash	1,519	1,502	2,658	2,613
Balances due from the Bank of Latvia	501,570	501,570	463,832	463,831
	503,089	503,072	466,490	466,444
Demand loans and receivables from banks	81,493	80,911	92,443	91,828
Demand deposits and balances due to banks	(2,920)	(2,920)	(2,348)	(2,348)
Total	581,662	581,063	556,585	555,924

35 Commitments and guarantees

In line with the lending activity the Bank enters into commitments to issue loans. These commitments take the form of approved but not yet issued loans, credit card limits and overdrafts.

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

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

The total outstanding contractual commitments to extend credit indicated above does not necessarily represent future cash requirements, as these commitments may expire or terminate without being funded.

	31 Dec 2019 '000 EUR	31 Dec 2019 '000 EUR	31 Dec 2018 '000 EUR	31 Dec 2018 '000 EUR
	Group	Bank	Group	Bank
Contracted amount				
Loan commitments	95,736	137,942	95,244	145,394
Financial guarantees	13,833	13,833	4,275	4,275
Other commitments	107	107	171	171
Total commitments and guarantees	109,676	151,882	99,690	149,840
Provisions	(105)	(154)	(76)	(138)
Net exposure	109,571	151,728	99,614	149,702

35 Commitments and guarantees, continued

Movements in the provisions for commitments and guarantees, 31 Dec 2019:

The Group, EUR'000

	Opening balance 1 Jan 2019	Origination and acquisition	Repayment s and disposals	Changes in credit risk, net	Other adjustments	Closing balance 31 Dec 2019
Stage 1	75	190	(49)	(109)	(2)	105
Stage 2	1	-	-	(1)	-	-
Stage 3	-	-	(2)	2	-	-
Total	76	190	(51)	(108)	(2)	105

The Bank, EUR'000

	Opening balance 1 Jan 2019	Origination and acquisition	Repayments and disposals	Changes in credit risk, net	Closing balance 31 Dec 2019
Stage 1	127	192	(54)	(143)	122
Stage 2	11	5	(6)	22	32
Stage 3	-	-	(2)	2	-
Total	138	197	(62)	(119)	154

Movements in the provisions for commitments and guarantees, 31 Dec 2018:

The Group, EUR'000

	Opening balance 1 Jan 2018	Origination and acquisition	Repayments and disposals	Changes in credit risk, net	Closing balance 31 Dec 2018
Stage 1	162	24	(93)	(18)	75
Stage 2	2	-	(2)	1	1
Total	164	24	(95)	(17)	76

The Bank, EUR'000

	Opening balance 1 Jan 2018	Origination and acquisition	Derecognition and repayments	Changes in credit risk, net	Closing balance 31 Dec 2018
Stage 1	201	25	(93)	(6)	127
Stage 2	6	-	(2)	7	11
Total	207	25	(95)	1	138

36 Provisions

	31 Dec 2019 '000 EUR Group	31 Dec 2019 '000 EUR Bank	31 Dec 2018 '000 EUR Group	31 Dec 2018 '000 EUR Bank
Provisions for possible obligations – Litigations (Note 37 (b))	34,000	34,000	34,000	34,000
Provisions for commitments and guarantees (Note 35)	105	154	76	138
Total	34,105	34,154	34,076	34,138

Movements in the provisions:

EUR'000	2019 '000 EUR Group	2019 '000 EUR Bank	2018 '000 EUR Group	2018 '000 EUR Bank
Balance at 1 January	34,076	34,138	20,000	20,000
IFRS 9 provisions for commitments and guarantees (day-one implementation impact):	-	-	164	207
Restated balance at 1 January	-	-	20,164	20,207
Increase of provisions for possible obligations – Litigations (Note 37 (b))	-	-	14,000	14,000
Increase/(decrease) of provisions for commitments and guarantees (Note 35)	29	16	(88)	(69)
Balance at 31 December	34,105	34,154	34,076	34,138

37 Litigations

(a) Ordinary legal proceedings

In the ordinary course of business, the Bank and the Group are involved in a number of judicial proceedings brought against the Bank and the Group by its customers, in respect of matters such as ownership and property rights, cancellation or challenge of the transactions or contracts and monetary claims. As at 31 December 2019, there were 17 open legal proceedings against the Bank and the Group with a total amount under dispute of EUR 401 thousand (31 December 2018: EUR 381 thousand). The ultimate outcome of any such litigation is uncertain and any position taken by the Management Board involves significant judgement and inherent estimation uncertainty. In respect of the above litigation proceedings, no liability (provision) has been recognized as in the Management Board's view, supported by the result of the analysis by the Bank's external legal advisers, the likelihood of any loss (outflow of economic resources) arising therefrom is possible rather than probable.

(b) Litigation in France

The Bank is defendant in a court case for alleged involvement in tax evasion and aggravated money laundering. Criminal investigation in France started in July 2011 (further to enquiries from that country's tax authorities in respect of another (unrelated) entity - France Off Shore) focusing on alleged tax evasion offences committed by that entity. Within that investigation the Bank, and former head of its representative office in Paris were placed under investigation for suspicion of aggravated money laundering on 12 December 2012.

On 6 July 2017, the 32nd section of the Paris Criminal Court ruled in its first instance judgment that the Bank was guilty of aggravated money laundering by providing assistance, as a bank, to placement, concealment or conversion operations of the proceed of an offence. The Court ordered the Bank to pay

37 Litigations, continued

a criminal fine of EUR 80 million and damages, jointly and severally with the other defendants, of EUR 10 million to the French State and EUR100 thousand court expenses. In addition, the Bank was ordered to stop any banking activities in France for 5 years. The Bank lodged its appeal against the first instance judgement on 12 July 2017, followed by an appeal by the Public Prosecutor, to leave the upper limit of the amount of any penalties above that included in the first instance court's sentence. The date for the appeal court hearing has been planned to take place late September 2019, but was suspended to May 2020. The Management Board intends to cooperate with all relevant authorities in the proceeding. However, although there can be no assurance as to the ultimate outcome of the case, the Bank believes to have a meritorious defence, and so it intends to vigorously defend its position. Among other things, the amounts the Bank was sentenced to pay appear inflated and ungrounded based on the understanding of the French criminal law by the Bank and its legal advisers.

Taking into account all the remaining potential court instances of the case, both in France and in Latvia, the legal process may continue for a period of time of 2-3 years or more. As at 31 December 2017, the Bank recognized a provision amounting to EUR 20 million and as at 31 December 2018 EUR 14 million (total EUR 34 million) which it believes to be the best estimate of the expenditure to be ultimately required to settle the obligation, including fines, damages, procedural expenditure and expected legal expenses. The Management Board is of the position that the enforcement of any final decision coming out of the above-mentioned proceedings in France will require prior recognition by the relevant Latvian court in accordance with the relevant requirements of the Criminal Procedure Law of the Republic of Latvia. Assuming that the first-instance court ruling is upheld by the courts both in France and in Latvia, which in the Management Board's view is not certain, significant amount of judgment would be required in particular in estimating the amounts of the fines the Bank would be ordered to pay by the Latvian court, as there are no prior cases of judicial precedent available, coupled with the fact that certain provisions of the Latvian Criminal Procedure Law and Criminal Law are open to differing interpretations, in particular as it related to where and to what extent the fines levied in such proceedings can be capped based on the provisions of those laws. In arriving at its best estimate of the amount of the provision, the Management Board assumed that the relevant Latvian court decides to align the fine with the sanction provided in the Criminal Law, following the general provisions of that law – i.e. assuming that a cap of 3.8MEUR will apply as included in Art. 784 of the Criminal Procedure Law. However, alternative outcomes cannot be excluded based on different interpretations of the Latvian laws.

Accordingly, due to the inherent uncertainty associated with the proceedings of such nature as exacerbated by the above factors, while the Bank and the Group believe the amount of the provision recognized in these separate and consolidated financial statements to represent their best estimate of the expenditure to be ultimately required to settle the obligation, the actual expenditure required to settle the said claim may be substantially in excess of these amounts reserved.

38 Trust and custody activities

(a) Trust activities

Funds under trust management represent securities and other assets managed and held by the Bank and the Group on behalf of customers. The Bank and the Group earn commission income for holding such assets. The Bank and the Group are not subject to interest, credit, liquidity, price and currency risk with respect of these securities in accordance with the agreements concluded with the customers. As at 31 December 2019 the total assets held by the Group on behalf of customers and assets under management were EUR 212,889 thousand (2018: EUR 332,060 thousand) and by the Bank EUR 212,889 thousand (2018: EUR 214,559 thousand) accordingly.

39 Related party transactions

Related parties are defined as shareholders who have significant influence over the Bank, companies in which they have a controlling interest, members of the Council and Board of Directors, key management personnel, their close relatives and companies in which they have a controlling interest, as well as subsidiaries and associated companies.

'000 EUR	31 Dec 2019			31 Dec 2018		
	Subsidiaries and associates	Key management	Other related parties	Subsidiaries and associates	Key management	Other related parties
Loans and receivables due from customers	143,082	87	28,331	165,716	105	22,465
Expected credit losses	(18 488)	(1)	(78)	(18,431)	(1)	(65)
Current accounts and deposits due to customers	15,531	35,723	100,408	3,256	9,474	908
Equity instruments	-	-	-	1,229	-	-
Commitments and Contingencies	42 442	462	5 217	51,647	781	11,824
Provisions	(48)	(5)	(1)	(62)	(4)	(1)
Interest income	7,348	5	947	6,809	4	782
Interest expense	-	877	477	-	904	528
Fee and commission income	26	5	75	8	1	45
Fee and commission expense	-	-	67	-	-	112

Total remuneration included in General administrative expenses (Note 14):

	31 Dec 2019	31 Dec 2019	31 Dec 2018	31 Dec 2018
	'000 EUR	'000 EUR	'000 EUR	'000 EUR
	Group	Bank	Group	Bank
Members of the Council	499	477	503	483
Members of the Board of Directors	1,833	1,347	1,474	812
Total	2,332	1,824	1,977	1,295

During the year 2019, the Bank received dividends from its subsidiary InCredit GROUP SIA in the amount of EUR 1,783 thousand (2018: EUR 1,275 thousand); from Rietumu Leasing SIA in the amount of EUR 1,008 thousand and from RB Asset Management in the amount of EUR 326 thousand (2018: EUR 570 thousand).

40 Fair value of financial assets

(a) Financial assets measured at fair value

The table below analyses financial assets measured at fair value at the end of the reporting period, by the level in the fair value hierarchy into which the fair value measurement is categorised.

The Group

31 Dec 2019	<u>Level (1)</u>	<u>Level (2)</u>	<u>Level (3)</u>	<u>Total</u>
Financial assets				
Financial assets at fair value through other comprehensive income	270,738	19,691	61	290,490
Financial assets at fair value through profit or loss	9,025	538	592	10,155
Financial liabilities				
Financial assets at fair value through profit or loss	-	94	-	94
31 Dec 2018	<u>Level (1)</u>	<u>Level (2)</u>	<u>Level (3)</u>	<u>Total</u>
Financial assets				
Financial assets at fair value through other comprehensive income	146,354	13,006	45	159,405
Financial assets at fair value through profit or loss	2,192	1,809	7,814	11,815

The Bank

31 Dec 2019	<u>Level (1)</u>	<u>Level (2)</u>	<u>Level (3)</u>	<u>Total</u>
Financial assets				
Financial assets at fair value through other comprehensive income	270,738	19,691	61	290,490
Financial assets at fair value through profit or loss	9,025	538	486	10,049
Financial liabilities				
Financial assets at fair value through profit or loss	-	94	-	94
31 Dec 2018	<u>Level (1)</u>	<u>Level (2)</u>	<u>Level (3)</u>	<u>Total</u>
Financial assets				
Financial assets at fair value through other comprehensive income	146,354	13,006	45	159,405
Financial assets at fair value through profit or loss	2,211	1,809	7,651	11,671

40 Fair value of financial assets, continued

The following table shows the valuation techniques used in measuring Level 2 fair values:

Type	Valuation technique
Financial assets and liabilities at fair value through profit or loss	Market comparison technique: The fair values are based on broker quotes. Similar contracts are traded in an active market and the quotes reflect the actual transactions in similar instruments.

Under Level 3 of fair value hierarchy certain shares were classified, the fair value of which is measured based on estimated fair value of underlying assets.

Financial assets not measured at fair value

The table below analyses the fair values of financial assets not measured at fair value, by the level in the fair value hierarchy into which each fair value measurement is categorised.

The Group

31 December 2019	Level 1 '000 EUR	Level 2 '000 EUR	Level 3 '000 EUR	Total fair values '000 EUR	Total carrying amount '000 EUR
Financial assets					
Loans and receivables due from banks	-	-	81,493	81,493	81,493
Loans and receivables due from customers	-	-	585,291	585,291	585,291
Debt securities at amortised cost	60,400	-	-	60,400	60,536
Other financial assets	-	-	27,286	27,286	27,286
Financial liabilities					
Deposits and balances due to banks	-	-	2,920	2,920	2,920
Deposits and balances due to customers	-	-	1,319,833	1,319,833	1,319,833
Issued debt securities	-	-	712	712	712
Other financial liabilities	-	-	7,500	7,500	7,500

31 December 2018	Level 1 '000 EUR	Level 2 '000 EUR	Level 3 '000 EUR	Total fair values '000 EUR	Total carrying amount '000 EUR
Financial assets					
Loans and receivables due from banks	-	-	92,443	92,443	92,443
Loans and receivables due from customers	-	-	617,899	617,899	617,899
Debt securities at amortised cost	36,329	-	-	36,329	35,537
Other financial assets	-	-	20,094	20,094	20,094
Financial liabilities					
Deposits and balances due to banks	-	-	2,403	2,403	2,403
Deposits and balances due to customers	-	-	1,019,696	1,019,696	1,019,696
Issued debt securities	-	-	62	62	62
Other financial liabilities	-	-	7,874	7,874	7,874

40 Fair value of financial assets, continued

The Bank

31 December 2019	Level 1	Level 2	Level 3	Total fair values	Total carrying amount
	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR
Financial assets					
Loans and receivables due from banks	-	-	80,911	80,911	80,911
Loans and receivables due from customers	-	-	638,523	638,523	638,523
Debt securities at amortised cost	60,400	-	-	60,400	60,536
Other financial assets	-	-	27,219	27,219	27,219
Financial liabilities					
Deposits and balances due to banks	-	-	2,920	2,920	2,920
Deposits and balances due to customers	-	-	1,332,529	1,332,529	1,332,529
Other financial liabilities	-	-	35,634	35,634	35,634
<hr/>					
31 December 2018	Level 1	Level 2	Level 3	Total fair values	Total carrying amount
	'000 EUR	'000 EUR	'000 EUR	'000 EUR	'000 EUR
Financial assets					
Loans and receivables due from banks	-	-	91,828	91,828	91,828
Loans and receivables due from customers	-	-	695,343	695,343	695,343
Debt securities at amortised cost	36,329	-	-	36,329	35,537
Other financial assets	-	-	19,963	19,963	19,963
Financial liabilities					
Deposits and balances due to banks	-	-	2,348	2,348	2,348
Deposits and balances due to customers	-	-	1,033,539	1,033,539	1,033,539
Other financial liabilities	-	-	7,844	7,844	7,844

The fair value of financial assets and liabilities measured at amortized cost, except for debt securities measured at amortised cost, is measured using discounted cash flows. Discounting rate is derived from market interest rate adjusted for risk related to individual instruments. Fair value of debt securities at amortised cost is measured based on individual market price.

41 Currency analysis

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

The Group

	EUR '000 EUR	USD '000 EUR	Other currencies '000 EUR	Total '000 EUR
Financial assets				
Cash and balances with Bank of Latvia	502,569	180	340	503,089
Financial assets at fair value through profit or loss	1,048	8,948	159	10,155
Loans and receivables due from banks	2,504	58,529	20,460	81,493
Loans and receivables due from customers	485,906	98,164	1,221	585,291
Financial assets at fair value through other comprehensive income	218,690	71,800	-	290,490
Debt securities at amortised cost	60,536	-	-	60,536
Other financial assets	2,256	20,482	4,548	27,286
Total financial assets	1,273,509	258,103	26,728	1,558,340
Financial liabilities				
Financial instruments at fair value through profit or loss	94	-	-	94
Deposits and balances due to banks	1,120	1,574	226	2,920
Current accounts and deposits due to customers	1,097,940	186,984	34,909	1,319,833
Issued debt securities	-	-	712	712
Other financial liabilities	6,822	-	678	7,500
Total financial liabilities	1,105,976	188,558	36,525	1,331,059
Net position as of 31 December 2019	167,533	69,545	(9,797)	
Net off balance sheet position as of 31 December 2019	55,070	(63,550)	8,480	
Net total positions as of 31 December 2019	222,603	5,995	(1,317)	
Net total positions as of 31 December 2018	300,823	30,142	30,463	

41 Currency analysis, continued

The following table shows the currency structure of financial assets and liabilities of the Group as at 31 December 2018:

The Group

	EUR '000 EUR	USD '000 EUR	Other currencies '000 EUR	Total '000 EUR
Financial assets				
Cash and balances with Bank of Latvia	465,468	907	115	466,490
Financial assets at fair value through profit or loss	2,217	9,362	236	11,815
Loans and receivables due from banks	4,689	54,975	32,779	92,443
Loans and receivables due from customers	450,094	130,606	37,199	617,899
Financial assets at fair value through other comprehensive income	159,405	-	-	159,405
Debt securities at amortised cost	35,537	-	-	35,537
Other financial assets	1,711	12,163	6,220	20,094
Total financial assets	1,119,121	208,013	76,549	1,403,683
Financial liabilities				
Deposits and balances due to banks	750	1,428	225	2,403
Current accounts and deposits due to customers	806,636	168,441	44,619	1,019,696
Issued debt securities	-	62	-	62
Other financial liabilities	7,863	8	3	7,874
Total financial liabilities	815,249	169,939	44,847	1,030,035
Net position as of 31 December 2018	303,872	38,074	31,702	
Net off balance sheet position as of 31 December 2018	40,799	(45,428)	4,978	
Net total positions as of 31 December 2018	344,671	(7,354)	36,680	
Net total positions as of 31 December 2017	364,050	(10,083)	(7,015)	

41 Currency analysis, continued

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

The Bank

	EUR '000 EUR	USD '000 EUR	Other currencies '000 EUR	Total '000 EUR
Financial assets				
Cash and balances with Bank of Latvia	502,552	180	340	503,072
Financial assets at fair value through profit or loss	942	8,948	159	10,049
Loans and receivables due from banks	2,121	58,517	20,273	80,911
Loans and receivables due from customers	540,856	95,750	1,917	638,523
Financial assets at fair value through other comprehensive income	218,690	71,800	-	290,490
Debt securities at amortised cost	60,536	-	-	60,536
Other financial assets	2,197	20,474	4,548	27,219
Total financial assets	1,327,894	255,669	27,237	1,610,800
Financial liabilities				
Financial instruments at fair value through profit or loss	94	-	-	94
Deposits and balances due to banks	1,120	1,574	226	2,920
Current accounts and deposits due to customers	1,107,862	189,730	34,937	1,332,529
Other financial liabilities	34,956	-	678	35,634
Total financial liabilities	1,144,032	191,304	35,841	1,371,177
Net position as of 31 December 2019	183,862	64,365	(8,604)	
Net off balance sheet position as of 31 December 2019	55,070	(63,550)	8,480	
Net total positions as of 31 December 2019	238,932	815	(124)	
Net total positions as of 31 December 2018	392,805	37,625	(6,089)	

41 Currency analysis, continued

The following table shows the currency structure of financial assets and liabilities of the Bank as at 31 December 2018:

The Bank

	EUR '000 EUR	USD '000 EUR	Other currencies '000 EUR	Total '000 EUR
Financial assets				
Cash and balances with Bank of Latvia	465,423	906	115	466,444
Financial assets at fair value through profit or loss	1,979	9,577	115	11,671
Loans and receivables due from banks	4,254	54,918	32,656	91,828
Loans and receivables due from customers	553,471	141,002	870	695,343
Financial assets at fair value through other comprehensive income	159,405	-	-	159,405
Debt securities at amortised cost	35,537	-	-	35,537
Other financial assets	1,660	12,083	6,220	19,963
Total financial assets	1,221,729	218,486	39,976	1,480,191
Financial liabilities				
Deposits and balances due to banks	750	1,428	170	2,348
Current accounts and deposits due to customers	817,313	171,573	44,653	1,033,539
Other financial liabilities	7,844	-	-	7,844
Total financial liabilities	825,907	173,001	44,823	1,043,731
Net position as of 31 December 2018	395,822	45,485	(4,847)	
Net off balance sheet position as of 31 December 2018	40,450	(45,777)	4,978	
Net total positions as of 31 December 2018	436,272	(292)	131	
Net total positions as of 31 December 2017	430,693	(14,708)	(6,524)	

42 Interest rate risk analysis

The following table shows the interest rate contracted re-pricing risk of financial assets and liabilities of the Group as at 31 December 2019, based on the earlier of contractual interest rate repricing or maturity:

	Less than 1 month '000 EUR	1 to 3 months '000 EUR	3 months to 1 year '000 EUR	1 to 5 years '000 EUR	More than 5 years '000 EUR	Non- interest bearing '000 EUR	Total '000 EUR
Financial assets							
Cash and balances with Bank of Latvia	501,570	-	-	-	-	1,519	503,089
Financial assets at fair value through profit or loss	-	-	-	-	-	10,155	10,155
Loans and receivables due from banks	429	-	-	-	-	81,064	81,493
Loans and receivables due from customers	105,427	149,984	22,935	236,795	8,953	61,197	585,291
Financial assets at fair value through other comprehensive income	290,490	-	-	-	-	-	290,490
Debt securities at amortised cost	706	38,276	7,845	13,709	-	-	60,536
Total financial assets	898,622	188,260	30,780	250,504	8,953	153,935	1,531,054
Financial liabilities							
Financial instruments at fair value through profit or loss	-	-	-	-	-	94	94
Deposits and balances due to banks	-	-	-	-	-	2,920	2,920
Current accounts and deposits due to customers	343,988	62,325	203,371	398,204	11,575	300,370	1,319,833
Issued debt securities	-	-	-	712	-	-	712
Total financial liabilities	343,988	62,325	203,371	398,916	11,575	303,384	1,323,559
Net position as at 31 December 2019	554,634	125,935	(172,591)	(148,412)	(2,622)	(149,449)	
Net position as at 31 December 2018	68,824	169,254	(77,436)	(127,904)	(1,215)	329,905	

42 Interest rate risk analysis, continued

The following table shows the interest rate contracted re-pricing risk of financial assets and liabilities of the Group as at 31 December 2018, based on the earlier of contractual interest rate repricing or maturity:

	Less than 1 month '000 EUR	1 to 3 months '000 EUR	3 months to 1 year '000 EUR	1 to 5 years '000 EUR	More than 5 years '000 EUR	Non- interest bearing '000 EUR	Total '000 EUR
Financial assets							
Cash and balances with Bank of Latvia	-	-	-	-	-	466,490	466,490
Financial assets at fair value through profit or loss	87	549	-	-	-	11,179	11,815
Loans and receivables due from banks	-	-	-	-	-	92,443	92,443
Loans and receivables due from customers	73,247	182,680	64,347	105,293	10,807	181,525	617,899
Financial assets at fair value through other comprehensive income	-	-	-	-	-	159,405	159,405
Debt securities at amortised cost	-	-	-	28,366	-	7,171	35,537
Total financial assets	73,334	183,229	64,347	133,659	10,807	918,213	1,383,589
Financial liabilities							
Deposits and balances due to banks	-	-	-	-	-	2,403	2,403
Current accounts and deposits due to customers	4,510	13,975	141,783	261,501	12,022	585,905	1,019,696
Issued debt securities	-	-	-	62	-	-	62
Total financial liabilities	4,510	13,975	141,783	261,563	12,022	588,308	1,022,161
Net position as at 31 December 2018	68,824	169,254	(77,436)	(127,904)	(1,215)	329,905	
Net position as at 31 December 2017	74,495	259,038	10,813	239,692	(4,062)	(233,024)	

42 Interest rate risk analysis, continued

The following table shows the interest rate contracted re-pricing risk of financial assets and liabilities of the Bank as at 31 December 2019, based on the earlier of contractual interest rate repricing or maturity:

	Less than 1 month '000 EUR	1 to 3 months '000 EUR	3 months to 1 year '000 EUR	1 to 5 years '000 EUR	More than 5 years '000 EUR	Non- interest bearing '000 EUR	Total '000 EUR
Financial assets							
Cash and balances with Bank of Latvia	501,570	-	-	-	-	1,502	503,072
Financial assets at fair value through profit or loss	-	-	-	-	-	10,049	10,049
Loans and receivables due from banks	429	-	-	-	-	80,482	80,911
Loans and receivables due from customers	116,758	219,501	20,686	214,368	-	67,210	638,523
Financial assets at fair value through other comprehensive income	290,490	-	-	-	-	-	290,490
Debt securities at amortised cost	706	38,276	7,845	13,709	-	-	60,536
Total financial assets	909,953	257,777	28,531	228,077	-	159,243	1,583,581
Financial liabilities							
Financial instruments at fair value through profit or loss	-	-	-	-	-	94	94
Deposits and balances due to banks	-	-	-	-	-	2,920	2,920
Current accounts and deposits due to customers	349,333	63,370	204,809	402,331	11,575	301,111	1,332,529
Total financial liabilities	349,333	63,370	204,809	402,331	11,575	304,125	1,335,543
Net position as at 31 December 2019	560,620	194,407	(176,278)	(174,254)	(11,575)	(144,882)	
Net position as at 31 December 2018	68,994	240,520	(67,662)	(130,556)	(6,730)	319,775	

42 Interest rate risk analysis, continued

The following table shows the interest rate contracted re-pricing risk of financial assets and liabilities of the Bank as at 31 December 2018, based on the earlier of contractual interest rate repricing or maturity:

Financial assets	Less than 1 month '000 EUR	1 to 3 months '000 EUR	3 months to 1 year '000 EUR	1 to 5 years '000 EUR	More than 5 years '000 EUR	Non- interest bearing '000 EUR	Total '000 EUR
Cash and balances with Bank of Latvia	-	-	-	-	-	466,444	466,444
Financial assets at fair value through profit or loss	-	-	-	-	-	11,671	11,671
Loans and receivables due from banks	-	-	-	-	-	91,828	91,828
Loans and receivables due from customers	73,345	254,495	74,106	99,919	5,292	188,186	695,343
Financial assets at fair value through other comprehensive income	-	-	-	-	-	159,405	159,405
Debt securities at amortised cost	-	-	-	28,366	-	7,171	35,537
Total financial assets	73,345	254,495	74,106	128,285	5,292	924,705	1,460,228
Financial liabilities							
Deposits and balances due to banks	-	-	-	-	-	2,348	2,348
Current accounts and deposits due to customers	4,351	13,975	141,768	258,841	12,022	602,582	1,033,539
Total financial liabilities	4,351	13,975	141,768	258,841	12,022	604,930	1,035, 887
Net position as at 31 December 2018	68,994	240,520	(67,662)	(130,556)	(6,730)	319,775	
Net position as at 31 December 2017	99,611	328,975	9,914	229,654	(7,056)	(251,637)	

43 Interest in other entities

Non-controlling interest in subsidiaries

The following table summarises the information relating to the Group's subsidiaries that have material non-controlling interests (NCI), before any intra-group eliminations as at 31 December 2019 and for the year ended:

`000 EUR	InCredit Group SIA	Other subsidiaries	Total
Percentage of Non-controlling interest	49%		
Loans and advances due from customers	53,109		
Loans and receivables due from banks	155		
Other assets	651		
Deposits and balances due to financial institutions	(39,084)		
Current accounts and deposits due to customers	(2,300)		
Other liabilities	(4,680)		
Net assets	7,851		
Carrying amount of Non-controlling interest	3,847	291	4,138
Revenue	12,769		
Profit after tax	3,731		
Total comprehensive income	3,731		
Profit/(loss) allocated to Non-controlling interest	1,828	47	1,781
Cash flows from operating activities	715		
Cash flows from investment activities	(92)		
Cash flows from financing activities, before dividends to NCI	1,693		
Cash flows from financing activities - cash dividends to NCI	(2,338)		
Net increase (decrease) in cash and cash equivalents	(22)		

43 Interest in other entities, continued

The following table summarises the information relating to the Group's subsidiaries that have material non-controlling interests (NCI), before any intra-group eliminations as at 31 December 2018 and for the year ended:

`000 EUR	InCredit Group SIA	Other subsidiaries	Total
Percentage of Non-controlling interest	49%		
Loans and advances due from customers	49,257		
Loans and receivables due from banks	172		
Other assets	573		
Deposits and balances due to financial institutions	(35,026)		
Current accounts and deposits due to customers	(2,100)		
Other liabilities	(5,258)		
Net assets	7,618		
Carrying amount of Non-controlling interest	3,733	412	4,145
Revenue	12,723		
Profit after tax	4,966		
Total comprehensive income	4,966		
Profit/(loss) allocated to Non-controlling interest	2,433	(265)	2,168
Cash flows from operating activities	708		
Cash flows from investment activities	52		
Cash flows from financing activities, before dividends to NCI	349		
Cash flows from financing activities - cash dividends to NCI	(1,225)		
Net increase (decrease) in cash and cash equivalents	(116)		

Two investment funds controlled by the Group were liquidated in May 2019. As at 31 December 2019 the Group has no control over investments funds.

44 Disposal of subsidiaries

The disposal of the subsidiaries in 2019 had the following effect on the Group's assets and liabilities at the date of disposal:

<u>`000 EUR</u>	FRB Elektro SIA	KINI Land SIA	Bērzaunes 13 SIA	Total
Disposed shares %	85%	100%	100%	
Assets				
Cash and due from central banks	24	-	-	24
Loans and receivables due from banks	47	23	8	78
Investment property	-	1,567	550	2,117
Property and equipment	1,695	-	2	1,697
Intangible assets	340	-	-	340
Other assets	158	2	-	160
Current tax asset	33	4	-	37
Liabilities				
Deposits and balances due to financial institutions	(3,205)	-	(426)	(3,631)
Current accounts and deposits due to customers	(139)	-	-	(139)
Other liabilities	(360)	(2)	(6)	(368)
Net identifiable assets and liabilities	(1,407)	1,594	128	315
Attributable to equity holders of the Bank	(1,196)	1,594	128	526
Consideration received	3	2,941	117	3,061

44 Disposal of subsidiaries, continued

The disposal of the subsidiaries in 2018 had the following effect on the Group's assets and liabilities at the date of disposal:

<u>`000 EUR</u>	TC Gaiļezers SIA	Hotel Jūrnieks SIA	Cabinet Holding SIA	Total
Disposed shares %	100%	100%	100%	
Assets				
Loans and receivables due from banks	74	-	4	78
Property and equipment	-	1	-	1
Investment property	-	1,105	-	1,105
Intangible assets	-	-	-	-
Other assets	60	104	2	166
Current tax asset	13	-	-	13
Liabilities				
Deposits and balances due to financial institutions	-	(1,667)	-	(1,667)
Current accounts and deposits due to customers	-	-	(50)	(50)
Other liabilities	(56)	(21)	(21)	(98)
Net identifiable assets and liabilities	91	(478)	(65)	(452)
Attributable to equity holders of the Bank	91	(478)	(65)	(452)
Interest retained	-	-	3	3
Consideration received	47	2	-	49

45 Acquisition of subsidiaries

In 2019 the Group acquired the following subsidiaries:

	PH Serviss Ltd
Date of acquisition	31.01.2019
Acquired shares %	100%

The acquisition of the subsidiaries had the following effect on the Group's assets and liabilities at the date acquisition:

'000 EUR	PH Serviss Ltd
Assets	
Loans and receivables due from banks	98
Investment property	1,321
Other assets	5
Deferred tax asset	85
Current accounts and deposits due to customers	(1,340)
Other liabilities	(13)
Net identifiable assets and liabilities	156
Net identifiable assets and liabilities attributable to equity holders of the bank	156
Negative goodwill	156
Consideration paid	-

In 2018 the Group acquired the following subsidiaries:

	Cabinet Holding SIA
Date of acquisition	14.05.2018
Acquired shares %	100%

The acquisition of the subsidiaries had the following effect on the Group's assets and liabilities at the date acquisition:

'000 EUR	Cabinet Holding SIA
Assets	
Loans and advances due from customers	2
Current accounts and deposits due to customers	(37)
Other liabilities	(15)
Deferred tax liability	-
Net identifiable assets and liabilities	(50)
Net identifiable assets and liabilities attributable to equity holders of the bank	(50)
(Goodwill)/Negative goodwill	(53)
Consideration paid	3

Acquisition of business

In January 2019, the Group acquired the full control over a business combination PH Serviss Ltd.

In May 2018, the Group acquired the full control over a business combination Cabinet Holding SIA.

46 Events after the reporting date

In March 2020, restrictions related to spread of Covid-19 were imposed in Latvia and many other countries. The management of the Bank is closely monitoring the situation and taking the appropriate actions necessary in order to ensure that the Bank can properly provide banking services to the customers and protect the employees. The Bank gradually transfers employees to the mandatory remote work. The customers of the Bank are serviced through remote systems. Customer's visits to the Bank are strictly limited and should be arranged ahead. The management of the Bank regularly informs employees via Intranet about the situation in the Bank and decisions made by the management regarding COVID-19. It is unpredictable how the situation may develop in the future, but the management of the Bank is taking proactive measures to prepare for different scenarios and ensure that the Bank remains resilient.