#### INDEPENDENT AUDITOR'S REPORT

To the shareholders of First Investment Bank AD

## Report on the unconsolidated financial statements

We have audited the accompanying unconsolidated financial statements of First Investment Bank AD ("the Bank"), which comprise the unconsolidated statement of the financial position as at 31 December 2011, the unconsolidated statement of comprehensive income, the unconsolidated statement of changes in equity and the unconsolidated statement of cash flows for the year then ended, and a summary of significant accounting policies and other explanatory notes.

Management's Responsibility for the unconsolidated Financial Statements

Management is responsible for the preparation and fair presentation of these unconsolidated financial statements 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 financial statements that are free from material misstatement, whether due to fraud or error.

#### Auditor's Responsibility

Our responsibility is to express an opinion on these unconsolidated financial statements based on our audit. We conducted our audit in accordance with International Standards on Auditing. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the unconsolidated financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the unconsolidated financial statements. The procedures selected depend on our judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, we consider internal control relevant to the entity's preparation and fair presentation of the financial statements 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 entity's internal control. An audit also includes evaluating the appropriateness of accounting principles used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the unconsolidated financial statements.

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

## Opinion

In our opinion, the unconsolidated financial statements give a true and fair view of the unconsolidated financial position of First Investment Bank AD as at 31 December 2011, and of

its unconsolidated financial performance and its unconsolidated cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the European Union.

## Report on other legal and supervisory requirements

Annual unconsolidated management report of the Bank in accordance with Article 33 of the Law on Accounting

As required under the Accountancy Act, we report that the historical financial information disclosed in the unconsolidated annual report of the activities of the Bank, prepared by Management as required under article 33 of the Accountancy Act, is consistent, in all material aspects, with the unconsolidated financial information disclosed in the audited unconsolidated financial statements of the Bank as of and for the year ended 31 December 2011. Management is responsible for the preparation of the annual report of the activities of the Bank which was approved by the Management Board of the Bank on 27 February 2012.

Tzvetelinka Koleva *Manager* 

KPMG Bulgaria OOD Sofia, 27 February 2012 Krassimir Hadjidinev Registered auditor



# FIRST INVESTMENT BANK AD

UNCONSOLIDATED FINANCIAL STATEMENTS
AS AT 31 DECEMBER 2011
WITH INDEPENDENT AUDITOR'S REPORT THEREON



# Unconsolidated statement of comprehensive income for the year ended 31 December 2011

			in BGN '000
	Note	2011	2010
Interest income		432,610	392,681
Interest expense and similar charges:		(276,181)	(258,930)
Net interest income	6	156,429	133,751
Fee and commission income		78,947	61,810
Fee and commission expense		(8,166)	(7,451)
Net fee and commission income	7	70,781	54,359
Net trading income	8	11,117	8,319
Other net operating income/(expense)	9	(2,192)	4,551
TOTAL INCOME FROM BANKING OPERATIONS		236,135	200,980
Administrative expenses	10	(150,361)	(137,050)
Allowance for impairment	11	(34,370)	(25,666)
Other expenses, net		(10,794)	(3,982)
PROFIT BEFORE TAX		40,610	34,282
Income tax expense	12	(4,107)	(3,444)
NET PROFIT		36,503	30,838
Other comprehensive income for the period			
Revaluation reserve on available for sale investments		778	114
Total other comprehensive income		778	114
TOTAL COMPREHENSIVE INCOME		37,281	30,952
The statement of comprehensive income is to be financial statements set out on pages 5 to 51.	read in conjunction with	the notes to and forn	ning part of the
Dimitar Kostov  Executive Director  Chairman of the Managing Board	Vassil Christov Executive Dire	ctor	



# Unconsolidated statement of the financial position as at 31 December 2011

in BGN '000

			IN BGN 000
	Note	2011	2010
ASSETS			
Cash and balances with Central Banks	13	913,598	546,281
Financial assets held for trading	14	8,659	16,641
Available for sale investments	15	680,924	743,217
Financial assets held to maturity	16	54,961	38,207
Loans and advances to banks and other financial institutions	17	100,054	20,924
Loans and advances to customers	18	4,127,002	3,375,162
Property and equipment	19	115,942	124,909
Intangible assets	20	14,343	16,321
Current tax assets		4,549	6,509
Other assets	22	81,637	55,912
TOTAL ASSETS		6,101,669	4,944,083
LIABILITIES AND CAPITAL			
Due to banks	23	2,054	9,509
Due to other customers	24	5,286,891	4,205,020
Liabilities evidenced by paper	25	132,443	133,804
Subordinated term debt	26	50,596	47,169
Perpetual debt	27	102,357	101,888
Hybrid debt	28	42,800	-
Deferred tax liability	21	3,628	3,143
Derivatives held for risk management		358	247
Current tax liabilities		288	1,003
Other liabilities	29 _	3,209	2,536
TOTAL LIABILITIES		5,624,624	4,504,319
Issued share capital	31	110,000	110,000
Share premium	31	97,000	97,000
Statutory reserve	31	39,861	39,861
Revaluation reserve on available for sale investments	31	746	(32)
Retained earnings	31	229,438	192,935
SHAREHOLDERS' EQUITY	<u>-</u>	477,045	439,764
TOTAL LIABILITIES AND GROUP EQUITY		6,101,669	4,944,083
	_		

The statement of the financial position is to be read in conjunction with the notes to and forming part of the financial statements set out on pages 5 to 51.

Dimitar Kostov Executive Director Chairman of the Managing Board	Vassil Christov Executive Director
Svetoslav Moldovansky Executive Director	Yanko Karakolev Chief Financial Officer

Tsvetelinka Koleva Manager KPMG Bulgaria OOD Krassimir Hadjidinev Registered auditor



# Unconsolidated statement of cash flows for the year ended 31 December 2011

		in BGN '000
	2011	2010
Net cash flow from operating activities		
Net profit Adjustment for non-cash items	36,503	30,838
Allowance for impairment	34,370	25,666
Depreciation and amortization	21,160	20,522
Income tax expense	4,107	3,444
(Profit)/loss from sale and write-off of tangible and intangible fixed as	•	(4,336)
	96,185	76,134
Change in operating assets		
(Increase)/decrease in financial instruments held for trading	7,982	(7,618)
(Increase)/decrease in available for sale investments	63,071	(429,117)
(Increase) in loans and advances to banks and financial institutions	(20,432)	(421)
(Increase) in loans to customers	(786,210)	(457,589)
(Increase) in other assets	(23,765)	(28,140)
Ohanna in an and un Bakilida	(759,354)	(922,885)
Change in operating liabilities Increase/(decrease) in deposits from banks		
Increase in amounts owed to other depositors	(7,455) 1,081,871	2,646
Net (decrease) in other liabilities		928,135
Net (decrease) in other habilities	(2,351) <b>1,072,065</b>	(1,977)
	<del></del>	928,804
Income tax paid	(1,202)	(3,120)
NET CASH FLOW FROM OPERATING ACTIVITIES	407,694	78,933
Cash flow from investing activities	·	70,933
(Purchase) of tangible and intangible fixed assets	(10,291)	(16,782)
Sale of tangible and intangible fixed assets (Increase) of investments	31 (16,754)	5,164 (8,189)
NET CASH FLOW FROM INVESTING ACTIVITIES	(27,014)	(19,807)
Financing activities		(10,001)
Increase/(decrease) in borrowings	45,335	(111,275)
NET CASH FLOW FROM FINANCING ACTIVITIES	45,335	(111,275)
NET INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENT	TS 426,015	(52,149)
CASH AND CASH EQUIVALENTS AT THE BEGINNING OF PERIO	DD 548,889	601,038
CASH AND CASH EQUIVALENTS AT THE END OF PERIOD (See	Note 33) 974,904	548,889
The cash flow statement is to be read in conjunction we set out on pages 5 to 51.	vith the notes to and forming part of the fi	nancial statements
Dimitar Kostov Executive Director	Vassil Christov Executive Director	
Chairman of the Managing Board		
Svetoslav Moldovansky	Yanko Karakolev	
Executive Director	Chief Financial Officer	
Tsvetelinka Koleva Manager	Krassimir Hadjidinev Registered auditor	
KPMG Bulgaria OOD	. register ou addition	



# Unconsolidated statement of shareholders' equity for the year ended 31 December 2011

in BGN '000

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	Issued share capital	Share premium	Retained earnings	Revaluation reserve	Statutory reserve	Total
Balance as at 1 January 2010	110,000	97,000	162,097	(146)	39,861	408,812
Total comprehensive income for the period						
Net profit for the year ended 31 December 2010	-	-	30,838	-	-	30,838
Other comprehensive income for the period						
Revaluation reserve on available for sale investments	-	-	-	114	-	114
Balance at 31 December 2010	110,000	97,000	192,935	(32)	39,861	439,764
Total comprehensive income for the period  Net profit for the year ended 31 December 2011  Other comprehensive income for the period		-	36,503	-	-	36,503
Revaluation reserve on available for sale investments	-	-	-	778	-	778
Balance at 31 December 2011	110,000	97,000	229,438	746	39,861	477,045

The statement of changes in equity is to be read in conjunction with the notes to and forming part of the financial statements set out on pages 5 to 51.

The financial statements were approved by the Managing Board on 27 February 2012 and signed on its behalf by:

Dimitar Kostov Executive Director Chairman of the Managing Board	Vassil Christov Executive Director
Svetoslav Moldovansky Executive Director	Yanko Karakolev Chief Financial Officer
Tsvetelinka Koleva Manager KPMG Bulgaria OOD	Krassimir Hadjidinev Registered auditor



#### 1. Basis of preparation

#### (a) Statute

First Investment Bank AD (the Bank) is incorporated in the Republic of Bulgaria and has its registered office in Sofia, at 37 Dragan Tzankov Blvd.

The Bank has a general banking license issued by the Bulgarian National Bank (BNB) according to which it is allowed to conduct all banking transactions permitted by Bulgarian legislation.

The Bank has foreign operations in Cyprus.

Following the successful Initial Public Offering of new shares at the Bulgarian Stock Exchange – Sofia, on June 13<sup>th</sup> 2007 the Bank was registered as a public company in the Register of the Financial Supervision Commission pursuant to the provisions of the Law on the Public Offering of Securities.

### (b) Statement of compliance

The unconsolidated financial statements were drawn up in accordance with the International Financial Reporting Standards (IFRS) endorsed by the European Commission.

The preparation of financial statements in conformity with IFRS requires the use of certain critical accounting estimates. It also requires management to exercise its judgement in the process of applying the Bank's accounting policies. The areas involving a higher degree of judgement or complexity, or areas where assumptions and estimates are significant to the financial statements, are disclosed in Note 2 (p).

#### (c) Presentation

The financial statements are presented in Bulgarian Leva (BGN) rounded to the nearest thousand.

The financial statements are prepared on a fair value basis for derivative financial instruments, financial assets and liabilities held for trading, and available-for-sale assets, except those for which a reliable measure of fair value is not available. Other financial assets and liabilities and non-financial assets and liabilities are stated at amortised cost or historical cost convention.

The present financial statements of the Bank are not consolidated. These individual financial statements form an integral part of the consolidated financial statements.



#### 2. Significant accounting policies

#### (a) Income recognition

#### (i) Interest Income

Interest income and expense is recognised in the profit or loss as it accrues, taking into account the effective yield of the asset (liability) or an applicable floating rate. Interest income and expense include the amortisation of any discount or premium or other differences between the initial carrying amount of an interest bearing instrument and its amount at maturity calculated on an effective interest rate basis.

## (ii) Fee and Commission

Fee and commission income arises on financial services provided by the Bank and is recognised in profit or loss when the corresponding service is provided.

## (iii) Net trading income

Net gains (losses) on financial assets and liabilities held for trading includes those gains and losses arising from disposals and changes in the fair value of financial assets and liabilities held for trading as well as trading income in dealing with foreign currencies and exchange differences from daily revaluation of the net open foreign currency position of the Bank.

#### (iv) Dividend income

Dividend income is recognised when the right to receive income is established. Usually this is the exdividend date for equity securities.

## (b) Basis of consolidation of subsidiaries

Investments in subsidiaries are stated at cost.

#### (c) Foreign currency transactions

## (i) Functional and presentation currency

The financial statements are presented in Bulgarian leva, which is the Bank's functional and presentation currency.

#### (ii) Transactions and balances

Transactions in foreign currencies are translated into the respective functional currencies of the operations at the spot exchange rates at the dates of the transactions. Monetary assets and liabilities denominated in foreign currencies at the reporting date are translated into the functional currency at the spot exchange rate at that date. Foreign currency differences arising on translation are difference between amortised cost in functional currency in the beginning of period, adjusted with effective interest and received payments during the period, and amortised cost in foreign currency at the spot exchange rate at the reporting date. Non-monetary assets and liabilities denominated in foreign currencies that are measured at fair value are retranslated into the functional currency at the spot exchange rate at the date that the fair value was determined.

#### (iii) Foreign operations

The functional currency of the foreign operations in Cyprus is determined by the management to be the Euro. In determining the functional currency of the foreign operations, the Bank takes into account the fact that they are carried out as an extension of the reporting entity.



#### 2. Significant accounting policies, continued

#### (d) Financial assets

The Bank classifies its financial assets in the following categories: financial assets at fair value through profit or loss; loans and receivables; held-to-maturity investments; and available-for-sale financial assets. Management determines the classification of its investments at initial recognition.

#### (i) Financial assets at fair value through profit or loss

This category has two sub-categories: financial assets held for trading, and those designated at fair value through profit or loss at inception. A financial asset is classified in this category if acquired principally for the purpose of selling in the short term or if so designated by management because its performance is assessed and monitored on the basis of its fair value. Derivatives are also categorised as held for trading unless they are designated as hedges.

#### (ii) Loans and receivables

Loans and receivables are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. They arise when the Bank provides money, goods or services directly to a debtor with no intention of trading the receivable.

#### (iii) Held-to-maturity

Held-to-maturity investments are non-derivative financial assets with fixed or determinable payments and fixed maturities that the Bank's management has the positive intention and ability to hold to maturity. Were the Bank to sell or re-classify other than an insignificant amount of held-to-maturity assets, the entire category would be tainted and reclassified as available for sale.

#### (iv) Available-for-sale

Available-for-sale investments are those intended to be held for an indefinite period of time, which may be sold in response to needs for liquidity or changes in interest rates, exchange rates or equity prices.

## (v) Recognition

Purchases and sales of financial assets at fair value through profit or loss, held to maturity and available for sale are recognised on the date of the actual delivery of the assets. Loans are recognised when cash is advanced to the borrowers. Financial assets are initially recognised at fair value plus, in the case of a financial asset not at fair value through profit or loss, transaction costs.

#### 2. Significant accounting policies, continued

## (d) Financial assets, continued

#### (vi) Measurement

Available-for-sale financial assets and financial assets at fair value through profit or loss are subsequently carried at fair value. Loans and receivables and held-to-maturity investments are carried at amortised cost using the effective interest method. Gains and losses arising from changes in the fair value of the 'financial assets at fair value through profit or loss' category are recognised in profit or loss. Gains and losses arising from changes in the fair value of available-for-sale financial assets are recognised in other comprehensive income, until the financial asset is derecognised or impaired. At this time the cumulative gain or loss previously recognised in other comprehensive income is reclassified in profit or loss.

Interest calculated using the effective interest method is recognised in profit or loss. Dividends on equity instruments are recognised in profit or loss when the Bank's right to receive payment is established.

# (vii) Fair value measurement principles

Fair value is the amount for which an asset could be exchanged, or a liability settled, between



knowledgeable, willing parties in an arm's length transaction on the measurement date.

When available, the Bank measures the fair value of an instrument using quoted prices in an active market for that instrument. A market is regarded as active if quoted prices are readily and regularly available and represent actual and regularly occurring market transactions on an arm's length basis.

If a market for a financial instrument is not active, the Bank establishes fair value using a valuation technique. Valuation techniques include using 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 Bank, incorporates all factors that market participants would consider in setting a price, and is consistent with accepted economic methodologies for pricing financial instruments. Inputs to valuation techniques reasonably represent market expectations and measures of the risk-return factors inherent in the financial instrument. The Bank calibrates valuation techniques and tests them for validity using prices from observable current market transactions in the same instrument or based on other available observable market data.

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 in 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 initial recognition, the financial instrument is initially measured



- 2. Significant accounting policies, continued
- (d) Financial assets, continued
- (vii) Fair value measurement principles, continued

at the transaction price and any difference between this price and the value initially obtained from a valuation model is subsequently recognised in profit or loss depending on the individual facts and circumstances of the transaction but not later than when the valuation is supported wholly by observable market data or the transaction is closed out.

Assets and long positions are measured at a bid price; liabilities and short positions are measured at an asking price. For netting positions average market prices are used to measure net risk positions and the "buy" or "sell" price is only applied to the respective net open position. Fair values reflect the credit risk of the instrument and include adjustments to take account of the credit risk of the Bank and counterparty where appropriate. Fair value estimates obtained from models are adjusted for any other factors, such as liquidity risk or model uncertainties, to the extent that the Bank believes a third-party market participant would take them into account in pricing a transaction.

The Bank assesses the fair value of financial instruments using the following hierarchy of methods която отразява значимостта на факторите използвани за определяне на справедлива стойност:

- Level 1: Quoted prices (unadjusted) in active markets for identical assets or liabilities;
- Level 2: fair value measurements based on market data either directly (i.e., as prices), or indirectly (i.e., derived from prices); This category includes quoted prices for instruments in an inactive market or instruments assessed by valuation techniques;
- Level 3: fair value measurements using inputs for the asset or liability that are not based on observable market data. In addition this level included capital investments in subsidiaries and other institutions related to the Bank's membership in certain organizations, stated at cost, for which there is no reliable market assessment.

The table below analyses financial instruments at fair value by valuation models.

in	BGN	000
31	Dece	embe

31 December 2011	Level 1	Level 2	Level 3	Total
Financial assets held for trading	8,659	-	-	8,659
Available for sale investments	611,581	26,934	42,409	680,924
Derivatives held for risk management	<u> </u>	(358)	-	(358)
Total	620,240	26,576	42,409	689,225
in BGN '000 31 December 2010	Level 1	Level 2	Level 3	Total
Financial assets held for trading	16,641	-	-	16,641
Available for sale investments	665,290	37,552	40,375	743,217
Derivatives held for risk management		(247)	-	(247)
Total	681,931	37,305	40,375	759,611

#### 2. Significant accounting policies, continued

#### (d) Financial assets, continued

## (viii) Derecognition

The Bank derecognises a financial asset when the contractual rights to the cash flows from the financial asset expire, or when the Bank transfers these rights in a transaction in which substantially all the risks and rewards of ownership of the financial assets are transferred to the buyer. Any interest in



transferred financial assets that is created or retained by the Bank is recognised as a separate asset or liability.

The Bank derecognises a financial liability when its contractual obligations are discharged or cancelled or expire.

The Bank enters into transactions whereby it transfers financial assets recognised in its statement of financial position, but retains either all or substantially all risks and rewards of the transferred asset. If all or substantially all risks and rewards are retained, then the transferred assets are not derecognised in the statement of financial position (an example of such transactions are repo deals).

In transactions in which the Bank neither retains nor transfers substantially all the risks and rewards of ownership of a financial asset, it derecognises the asset if it does not retain control over the asset. The rights and obligations retained in the transfer are recognised separately as assets and liabilities as appropriate. In transfers in which, control over the asset is retained, the Bank continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.

#### (e) Cash and cash equivalents

Cash and cash equivalents comprise cash balances on hand, cash deposited with the central bank and short-term highly liquid investments with maturity of up to three months.

#### (f) Investments

Investments that the Bank holds for the purpose of short-term profit taking are classified as financial assets for trading. Debt investments that the Bank has the intent and ability to hold to maturity are classified as held-to-maturity assets. Other investments are classified as available-for-sale assets.

#### (g) Securities borrowing and lending business and repurchase transactions

#### (i) Securities borrowing and lending

Investments lent under securities lending arrangements continue to be recognised in the statement of financial position and are measured in accordance with the accounting policy for assets held for trading or available-for-sale as appropriate. Cash collateral received in respect of securities lent is recognised as liabilities to either banks or customers. Investments borrowed under securities borrowing agreements are not recognised. Cash collateral placements in respect of securities borrowed are recognised under loans and advances to either banks or customers. Income and expenses arising from the securities borrowing and lending business are recognised on an accrual basis over the period of the transactions and are included in interest income or expense.

## (ii) Repurchase agreements

The Bank enters into purchases (sales) of investments under agreements to resell (repurchase) substantially identical investments at a certain date in the future at a fixed price. Investments purchased subject to commitments



#### 2. Significant accounting policies, continued

#### (g) Securities borrowing and lending business and repurchase transactions, continued

#### (ii) Repurchase agreements, continued

to resell them at future dates are not recognised. The amounts paid are recognised in loans to either banks or customers. The receivables are shown as collateralised by the underlying security. Investments sold under repurchase agreements continue to be recognised in the statement of financial position and are measured in accordance with the accounting policy for either assets held for trading or available-for-sale as appropriate. The proceeds from the sale of the investments are reported as liabilities to either banks or customers.

The difference between the purchase (sale) and resell (repurchase) considerations is recognised on an accrual basis over the period of the transaction and is included in interest income (expenses).

## (h) Borrowings

Borrowings are recognised initially at 'cost', being their issue proceeds (fair value of consideration received) net of transaction costs incurred. Borrowings are subsequently stated at amortised cost and any difference between net proceeds and the redemption value is recognized in profit or loss over the period of the borrowings using the effective yield method.

If the Bank purchases its own debt, it is removed from the statement of financial position and the difference between the carrying amount of a liability and the consideration paid is included in other operating income.

#### (i) Offsetting

Financial assets and liabilities are offset and the net amount is reported in the statement of financial position when the Bank has a legally enforceable right to set off the recognised amounts and the transactions are intended to be settled on a net basis.

#### (j) Impairment of Assets

The carrying amounts of the Bank's assets are reviewed at each balance sheet date to determine whether there is any indication of impairment. If any such indication exists, the asset's recoverable amount is estimated. An impairment loss is recognised whenever the carrying amount of an asset or its cash-generating unit exceeds its recoverable amount. Impairment losses are recognised in profit or loss.

#### (i) Loans and advances

Impairment loss on loans and receivables is measured as the difference between the asset's carrying amount and the present value of estimated future cash flows discounted at the financial asset's original effective interest rate. If the interest rate for the loan is a floating interest rate, the loan is discounted at the current effective contractual interest rate. Short-term balances are not discounted. The calculation of the present value of estimated future cash flows reflects not only interest and principal payments, but also cash flows that may result from foreclosure less costs for obtaining and selling the collateral for a given exposure.

Loans and advances are presented net of specific and general allowances for impairment. The carrying amount of the asset is reduced through use of an allowance account. Specific allowance for impairment is accounted for loans for which there is objective evidence of impairment as a result of a past event that occurred after initial recognition of the asset. Objective evidence of impairment includes significant financial difficulty of the issuer or obligor; a breach of contract, such as a default or delinquency in interest or principal payments; it becoming probable that the borrower will enter bankruptcy; observable data indicating that there is a measurable decrease in the estimated future cash flows from a group of financial assets.



#### 2. Significant accounting policies, continued

## (j) Impairment, continued

#### (i) Loans and advances, continued

General allowance is accounted for decreasing the carrying amount of a portfolio of loans with similar credit risk characteristics, which are collectively assessed for impairment. The estimated cash flows for a group of similar assets are determined on the basis of past practice and historical loss experience for portfolios with comparable characteristics. Historical loss experience should be adjusted, on the basis of observable data, to reflect the effects of current conditions. Assets that are individually assessed for impairment and for which an impairment loss is or continues to be recognized are not included in a collective assessment of impairment. Increases in the allowance account are recognised in profit or loss. When a loan is identified to be not recoverable, all the necessary legal procedures have been completed, and the final loss has been determined, the loan is written off directly.

If in a subsequent period the amount of an impairment loss decreases and the decrease can be linked objectively to an event occurring after the write down, the allowance reversal is recognised in profit or loss.

## (ii) Available for sale financial assets

When a decline in the fair value of an available-for-sale financial asset has been recognised directly in equity and there is objective evidence that the asset is impaired, the cumulative loss that had been recognised directly in equity is removed from equity and recognised in profit or loss. The amount of the cumulative loss that is removed from equity and recognised in profit or loss is the difference between the acquisition cost (net of any principal repayment and amortisation) and current fair value, less any impairment loss on that financial asset previously recognised in profit or loss. If, in a subsequent period, the fair value of a financial instrument classified as available for sale increases and the increase can be objectively related to an event occurring after the impairment loss was recognised in profit or loss, the impairment loss is reversed, with the amount of the reversal recognised in profit or loss. Any subsequent increase in the fair value of impaired equity security, available for sale, is recognized directly in the comprehensive income.

# (k) Property and equipment

Items of property, plant and equipment are stated in the statement of financial position at their acquisition cost less accumulated depreciation and allowance for impairment.

Depreciation is calculated on a straight line basis at prescribed rates designed to decrease the cost or valuation of fixed assets over their expected useful lives. The annual rates of amortisation are as follows:

Assets		%
•	Buildings	3 - 4
•	Equipment	10 - 33
•	Fixtures and fittings	10 - 15
•	Motor vehicles	20
•	Leasehold Improvements	2 - 50

Assets are not depreciated until they are brought into use and transferred from assets in the course of construction into the relevant asset category.

# 2. Significant accounting policies, continued

#### (I) Intangible assets

Intangible assets acquired by the Bank are stated at cost, less accumulated amortisation and any impairment losses.



Amortisation is calculated on a straight-line basis over the expected useful life of the asset. The annual rates of amortisation are as follows:

Assets

• Licences

• Computer software

8 - 33

#### (m) Provisions

A provision is recognised in the statement of financial position when the Bank has a legal or constructive obligation as a result of a past event, it is probable that an outflow of economic benefits will be required to settle the obligation and an reliable assessment of the amount due can be made. 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.

#### (n) Acceptances

An acceptance is created when the Bank agrees to pay, at a stipulated future date, a draft drawn on it for a specified amount. The Bank's acceptances primarily arise from documentary credits stipulating payment to be made a certain number of days after receipt of required documents. The Bank negotiates most acceptances to be settled at a later date following the reimbursement from the customers. Acceptances are accounted for as liabilities evidenced by paper.

## (o) Taxation

Tax on the profit for the year comprises current tax and the change in deferred tax. Current tax comprises tax payable calculated on the basis of the expected taxable income for the year, using the tax rates enacted by the statement of financial position date, and any adjustment of tax payable for previous years.

Deferred tax is provided using the balance sheet liability method on all temporary differences between the carrying amounts for financial reporting purposes and the amounts used for taxation purposes.

Deferred tax is calculated on the basis of the tax rates that are expected to apply to the period when the asset is realised or the liability is settled. The effect on deferred tax of any changes in tax rates is charged to profit or loss, except to the extent that it relates to items previously recognised either in other comprehensive income or directly in equity.

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

#### 2. Significant accounting policies, continued

#### (p) Critical accounting estimates and judgements in applying accounting policies



The Bank makes estimates and assumptions that affect the reported amounts of assets and liabilities within the next financial year. Estimates and judgements are continually evaluated and are based on historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances.

#### (i) Impairment losses on loans and advances

The Bank reviews its loan portfolios to assess impairment on a monthly basis. In determining whether an impairment loss should be recorded in profit or loss, the Bank makes judgements as to whether there is any observable data indicating that there is a measurable decrease in the estimated future cash flows from a portfolio of loans before the decrease can be identified with an individual loan in that portfolio. This evidence may include observable data indicating that there has been an adverse change in the payment status of borrowers in a group, or national or local economic conditions that correlate with defaults on assets in the group.

Management uses estimates based on historical loss experience for assets with credit risk characteristics and objective evidence of impairment similar to those in the portfolio when scheduling its future cash flows. The methodology and assumptions used for estimating both the amount and timing of future cash flows are reviewed regularly to reduce any differences between loss estimates and actual loss experience.

#### (ii) Income taxes

The Bank is subject to income taxes in numerous jurisdictions. Significant estimates are required in determining the worldwide provision for income taxes. There are many transactions and calculations for which the ultimate tax determination is uncertain during the ordinary course of business. The Bank recognises liabilities for anticipated tax audit issues based on estimates of whether additional taxes will be due. Where the final tax outcome of these matters is different from the amounts that were initially recorded, such differences will impact the income tax and deferred tax provisions in the period in which such determination is made.



#### 2. Significant accounting policies, continued

#### (q) Employee benefits

#### Defined contribution plans

A defined contribution plan is a post-employment benefit plan under which an entity pays fixed contributions into a separate entity and will have no legal or constructive obligation to pay further amounts. The Government of Bulgaria is responsible for providing pensions in Bulgaria under a defined contribution pension plan. The Bank's contributions to the defined contribution pension plan are recognised as an employee benefit expense in profit or loss in the periods during which services are rendered by employees.

#### Defined benefit plans

A defined benefit plan is a post-employment benefit plan other than a defined contribution plan. The Bank's net obligation in respect of defined benefit plans is calculated by estimating the amount of future benefit that employees have earned in return for their service in the current and prior periods; that benefit is discounted to determine its present value.

The Bank has an obligation to pay certain amounts to each employee who retires with the Bank in accordance with Art. 222, § 3 of the Labor Code. According to these regulations in the LC, when a labor contract of a bank's employee, who has acquired a pension right, is ended, the Bank is obliged to pay him compensations amounted to two gross monthly salaries. Where the employee has been with the same employer for the past 10 years, this employee is entitled to a compensation amounting to six gross monthly salaries. As at balance sheet date, the Management of the Bank estimates the approximate amount of the potential expenditures for every employee using the projected unit credit method.

#### Termination benefits

Termination benefits are recognised as an expense when the Bank is committed demonstrably, without realistic possibility of withdrawal, to a formal detailed plan to either terminate employment before the normal retirement date, or to provide termination benefits as a result of an offer made to encourage voluntary redundancy. Termination benefits for voluntary redundancies are recognised as an expense if the Bank has made an offer of voluntary redundancy, it is probable that the offer will be accepted, and the number of acceptances can be estimated reliably. If benefits are payable more than 12 months after the reporting period, then they are discounted to their present value.

#### Short-term employee benefits

Short-term employee benefit obligations are measured on an undiscounted basis and are expensed as the related service is provided. A liability is recognised for the amount expected to be paid under short-term cash bonus or profit-sharing plans if the Bank has a present legal or constructive obligation to pay this amount as a result of past service provided by the employee, and the obligation can be estimated reliably. The Bank recognises as a liability the undiscounted amount of the estimated costs related to annual leave expected to be paid in exchange for the employee's service for the period completed.



#### 2. Significant accounting policies, continued

## (r) New standards and interpretations not yet effective

A number of new standards, amendments to standards and interpretations are effective for annual periods beginning after 1 January 2011, and have not been applied in preparing these financial statements. None of these is expected to have a significant effect on the financial statements of the Bank.

Standards, Interpretations and amendments to published Standards that are not yet effective and have not been early adopted – endorsed by the European Commission

• Changes to IAS 7 Financial Instruments. Disclosures – Transfers of Financial Assets (issued October 2010) – effective from the first financial year that starts after 1 July 2011.

#### Documents issued by IASB/IFRICs not yet endorsed by the European Commission

Management believes that it is appropriate to disclose that the following new or revised standards, new interpretations and amendments to current standards, which are already issued by the International Accounting Standards Board (IASB), are not yet endorsed for adoption by the European commission, and therefore are not taken into account in preparing these consolidated financial statements. The effective dates for these will depend on the endorsement decision for adoption by the European Commission.

- IFRS 9 Financial Instruments (issued November 2009 and Additions to IFRS 9 issued October 2010) has an effective date 1 January 2015 and could change the classification and measurement of financial instruments.
- In May 2011 the IASB issued IFRS 10 Consolidated Financial Statements, IFRS 11 Joint arrangements, IFRS 12 Disclosures of Interests in Other Entities and IFRS 13 Fair Value Measurement, which all have an effective date of 1 January 2013. The IASB also issued IAS 27 Separate Financial Statements (2011) which supersedes IAS 27 (2008) and IAS 28 Investments in Associates and Joint Ventures (2011) which supersedes IAS 28 (2008). All of these standards have an effective date of 1 January 2013.
- Amendments to IAS 12 Deferred Tax: Recovery of Underlying Assets (issued December 2010) has an effective date 1 January 2012.
- Amendments to IFRS 1 Severe *Hyperinflation and Removal of Fixed Dates for First-time Adopters* (issued December 2010) has an effective date 1 July 2012.
- In June 2011 the IASB issued *Presentation of Items of Other Comprehensive Income* (Amendments to IAS 1) with an effective date of 1 July 2012.
- In June 2011 the IASB issued an amended IAS 19 *Employee Benefits* with an effective date of 1 January 2013.
- In December 2011 the IASB issued amendments to IFRS 7 *Disclosures Offsetting Financial Assets and Financial Liabilities* with an effective date of 1 January 2013.
- In December 2011 the IASB issued amendments to IAS 32 *Offsetting Financial Assets and Financial Liabilities* with an effective date of 1 January 2014.
- IFRIC Interpretation 20: Stripping Costs in the Production Phase of a Surface Mine with an effective date of 1 January 2013.



#### 3. Risk management disclosures

#### A. Trading activities

The Bank maintains active trading positions in a limited number of non-derivative financial instruments. Most of the Bank's trading activities are customer driven. In anticipation of customer demand, the Bank carries an inventory of money market instruments and maintains access to market liquidity by trading with other market makers. These activities constitute the proprietary trading business and enable the Bank to provide customers with money market products at competitive prices.

The Bank manages its trading activities by type of risk involved and on the basis of the categories of trading instruments held.

#### (i) Credit risk

The risk that counterparts to financial instruments might default on their obligations. Default risk is monitored on an ongoing basis subject to Group's internal risk management procedures and is controlled through minimum thresholds for the credit quality of the counterpart and setting limits on exposure amount. Exposures arising from trading activities are subject to total exposure limits and are authorised by the appropriate person or body as set out in credit risk management procedures.

Settlement risk is the risk of loss due to counterpart failing to deliver value (cash, securities or other assets) under contractually agreed terms. When trades are not cleared through clearing agent settlement risk is limited through simultaneous commencement of the payment and delivery legs.

#### (ii) Market risk

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. The Bank assumes market risk when taking positions in debt instruments, equities, derivatives and foreign exchange transactions. These risks are managed by enforcing limits on positions taken and their risk sensitivities as measured by value-at-risk, duration or other measures appropriate for particular position in view of its sensitivity to risk factors. The major risk factors that affect Bank's trading activities are changes of interest rates (interest rate risk), changes of exchange rates (foreign exchange risk) and changes of equity prices (equity price risk).

Exposure to market risk is formally managed in accordance with risk limits for buying or selling instruments set by senior management.

In a developing capital market, the prices with which transactions are realised can be different from quoted prices. While management has used available market information in estimating fair value, it may not be fully reflective of the value that could be realised under the current circumstances.

The quantitative measurement of interest rate risk is performed by applying VaR (Value at Risk) approach. The Value at Risk estimates the maximum loss that could occur over specified horizon, under normal market conditions, due to adverse changes in market rates if the positions remain unchanged for the specified time interval. Value at risk is calculated using one day horizon and 99 per cent confidence level, meaning that there is 1% probability that a portfolio will incur a loss in one day greater than its VaR. Parameters of the VaR model are estimated on the basis of exponentially weighted historical price changes of risk factors.

The Value at Risk is calculated and monitored on a daily basis as part of the Bank's ongoing risk management. The following table summarises the range of interest VaR for all positions carried at fair value that was experienced in 2011:



- 3. Risk management disclosures
- A. Trading activities
- (ii) Market risk, continued

	31 December	2011			31 December
in BGN '000	2011	average	low	high	2010
VaR	243	380	238	608	538

#### B. Non-trading activities

Below is a discussion of the various risks the Bank is exposed to as a result of its non-trading activities and the approach taken to manage those risks.

## (i) Liquidity risk

Liquidity risk is the risk that the Bank will encounter difficulty in meeting obligations associated with financial liabilities. Liquidity risk arises in the general funding of the Bank's activities and in the management of positions. It includes both the risk of being unable to fund assets at appropriate maturity and rates and the risk of being unable to liquidate an asset at a reasonable price and in an appropriate time frame to meet the liability obligations.

Funds are raised using a broad range of instruments including deposits, other liabilities evidenced by paper, subordinated debt instruments and share capital. This enhances funding flexibility, limits dependence on any one source of funds and generally lowers the cost of funds. The Bank makes its best efforts to maintain a balance between continuity of funding and flexibility through the use of liabilities with a range of maturity. The Bank continually assesses liquidity risk by identifying and monitoring changes in funding required to meet business goals and targets set in terms of the overall Bank strategy.

The following table provides an analysis of the financial assets and liabilities of the Bank into relevant maturity groupings based on the remaining periods to repayment.



- 3. Risk management disclosures, continued
- B. Non-trading activities, continued
- (i) Liquidity risk, continued

# Maturity table as at 31 December 2011

in BGN '000	Up to 1 Month	From 1 to 3 Months	From 3 months to 1 year	More than 1 year	Maturity not defined	Total
Assets						
Cash and balances with Central Banks	913,598	-	_	-	-	913,598
Financial assets held for trading	-	-	-	5,523	3,136	8,659
Available for sale investments	234,676	195,552	78,132	130,155	42,409	680,924
Financial assets held to maturity	-	-	-	54,961	-	54,961
Loans and advances to banks and other financial institutions	73,989	_	17,404	8,661	_	100,054
Loans and advances to	294,614	296,547	•	2,527,663	-	4,127,002
Total financial assets	1,516,877	492,099	1,103,714	2,726,963	45,545	5,885,198
Liabilities						
Due to banks	2,054	-	-	-	-	2,054
Due to other customers	1,306,614	1,012,606	2,482,489	485,182	-	5,286,891
Liabilities evidenced by paper	48,206	47,860	4,261	32,116	-	132,443
Subordinated term debt	-	-	-	50,596	-	50,596
Perpetual debt	-	-	-	-	102,357	102,357
Hybrid debt	-	-	-	-	42,800	42,800
Other financial liabilities	358		-	-	-	358
Total financial liabilities	1,357,232	1,060,466	2,486,750	567,894	145,157	5,617,499
Net liquidity gap	159,645	(568,367)	(1,383,036)	2,159,069	(99,612)	267,699



- 3. Risk management disclosures, continued
- B. Non-trading activities, continued
- (i) Liquidity risk, continued

# Maturity table as at 31 December 2010

			From 3		Maturity not	
in DCN (000	Up to 1 Month	From 1 to 3 Months	months to 1	More than 1	defined	Tatal
in BGN '000 <b>Assets</b>	Wonth	3 MONTHS	year	year		Total
Cash and balances with Central						
Banks	546,281	-	-	-	-	546,281
Financial assets held for trading	16,641	-	-	-		16,641
Available for sale investments	117,297	234,510	286,895	64,140	40,375	743,217
Financial assets held to maturity	5,393	1,391	-	31,423	-	38,207
Loans and advances to banks and other financial institutions	7,893	611	4,043	8,377	-	20,924
Loans and advances to customers	155,852	209,664	762,293	2,247,353	-	3,375,162
Total financial assets	849,357	446,176	1,053,231	2,351,293	40,375	4,740,432
Liabilities						
Due to banks	9,509	-	-	-	-	9,509
Due to other customers	1,320,551	805,689	951,820	1,126,960	-	4,205,020
Liabilities evidenced by paper	38,390	11,258	3,422	80,734	-	133,804
Subordinated term debt	-	-	-	47,169	-	47,169
Perpetual debt	-	-	-	-	101,888	101,888
Other financial liabilities	247	-	-	-	-	247
Total financial liabilities	1,368,697	816,947	955,242	1,254,863	101,888	4,497,637
Net liquidity gap	(519,340)	(370,771)	97,989	1,096,430	(61,513)	242,795

As at 31.12.11 the thirty largest non-bank depositors represent 5.73% of total deposits from other customers (2010: 4.60%).



#### 3. Risk management disclosures, continued

## B. Non-trading activities, continued

#### (i) Liquidity risk, continued

The following table provides a remaining maturities analysis of the financial liabilities of the Bank as at 31 December 2011 based on the contractual undiscounted cash flows.

in BGN '000	Up to 1 Month	From 1 to 3 Months	From 3 months to 1 year	More than 1 year	Total
Due to banks	2,054	-	-	-	2,054
Due to other customers	1,308,104	1,023,081	2,578,475	545,246	5,454,905
Liabilities evidenced by paper	48,277	48,145	4,355	35,545	136,322
Subordinated term debt	337	334	2,703	72,604	75,978
Perpetual debt	-	4,933	6,912	136,583	148,428
Hybrid debt	-	-	5,630	59,066	64,696
Other financial liabilities	358	-	-	-	358
Total financial liabilities	1,359,130	1,076,493	2,598,075	849,044	5,882,741

## (ii) Market risk

#### Interest rate risk

Interest rate risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market interest rates. The Bank's operations are subject to the risk of interest rate fluctuations to the extent that interest-earning assets and interest-bearing liabilities mature or reprice at different times or in differing amounts. In the case of floating rate assets and liabilities the Bank is also exposed to basis risk, which is the difference in repricing characteristics of the various floating rate indices, such as the Bulgarian Basic Interest Rate, the LIBOR and EURIBOR, although these indices tend to move in high correlation. In addition, the actual effect will depend on a number of other factors, including the extent to which repayments are made earlier or later than the contracted dates and variations in interest rate sensitivity within repricing periods and among currencies.

In order to quantify the interest rate risk of its non-trading activities, the Bank measures the impact of a change in the market rates both on net interest income and on the Bank's economic value defined as the difference between fair value of assets and fair value of liabilities. The interest rate risk on the economic value of the Bank following a standardised shock of +100bp/-100bp as at 31 December 2011 is BGN +1.0/-1.0 Mio. The interest rate risk on the Bank's net interest income one year forward following a standardised shock of +100bp/-100bp as at 31 December 2011 is BGN +2.2/-2.2 Mio.



- 3. Risk management disclosures, continued
- B. Non-trading activities, continued
- (ii) Market risk, continued

Interest rate risk, continued

The following table indicates the effective interest rates at 31 December 2011 and the periods in which financial liabilities and assets reprice.

		Woightod		Fixed rate instruments			
in BGN '000	Total	Weighted average effective interest rate	Floating rate Instruments	Less than 1 month	Between 1 month and 3 months	Between 3 months and 1 year	More than 1 year
Assets							
Cash and balances with Central							
Banks	145,059	0.13%	64,457	80,602	-	=	-
Financial assets held for trading	5,523	4.61%	-	<del>-</del>	-	-	5,523
Available for sale investments	638,515	1.44%	32,828	234,676	195,552	78,132	97,327
Financial assets held to maturity	54,961	4.95%	-	-	-	-	54,961
Loans and advances to banks and							
other financial institutions	97,428	2.01%	-	71,363	-	17,404	8,661
Loans and advances to customers	3,924,638	11.63%	3,390,792	74,159	20,616	124,100	314,971
Non-interest earning assets	1,235,545						
Total assets	6,101,669		3,488,077	460,800	216,168	219,636	481,443
Liabilities							
Due to banks	2,054	0.21%	2,054	-	-	-	-
Due to other customers	5,284,091	5.43%	750,243	553,571	1,012,606	2,482,489	485,182
Liabilities evidenced by paper	132,443	3.51%	55,237	48,088	-	· · · · -	29,118
Subordinated term debt	50,596	15.16%	· -	-	_	-	50,596
Perpetual debt	102,357	12.46%	_	-	-	_	102,357
Hybrid debt	42,800	12.86%	-	_	-	-	42,800
Non-interest bearing liabilities	10,283						·
Total liabilities	5,624,624		807,534	601,659	1,012,606	2,482,489	710,053

- 3. Risk management disclosures, continued
- B. Non-trading activities, continued
- (ii) Market risk, continued

## Interest rate risk, continued

The following table indicates the effective interest rates at 31 December 2010 and the periods in which financial liabilities and assets reprice.

					Fixed rate i	nstrument	:S
						Between	
		Weighted			Between 1	3	
		average		Less	month	months	
		effective	Floating rate	than 1	and 3	and 1	More than
in BGN '000	Total	interest rate	Instruments	month	months	year	1 year

**Assets** 



Non-interest bearing	7,917						
Perpetual debt	101,888	12.46%	-	-	-	-	101,888
Subordinated term debt	47,169	15.15%	-	-	-	-	47,169
Liabilities evidenced by paper	133,804	3.33%	68,326	38,294	78	14	27,092
Due to other customers	4,204,032	5.65%	1,387,396	420,984	691,090	810,628	893,934
<b>Liabilities</b> Due to banks	9,509	0.18%	2,509	7,000	-	-	-
Total assets	4,944,083		2,976,913	225,723	259,586	424,864	278,089
Non-interest earning assets	778,908						
Loans and advances to	3,338,357	12.52%	2,902,999	70,563	23,685	134,047	207,063
Financial assets held to maturity  Loans and advances to banks and other financial institutions	38,207 18,337	4.82% 5.24%	- 121	5,394 5,910	1,391	3,922	31,422 8,384
Available for sale investments	702,842	0.89%	46,348	117,297	234,510	286,895	17,792
Financial assets held for trading	13,428	3.58%	-	-	-	-	13,428
Cash and balances with Central Banks	54,004	0.24%	27,445	26,559	-	-	-



#### 3. Risk management disclosures, continued

#### B. Non-trading activities, continued

#### (ii) Market risk, continued

#### Currency risk

Currency risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in foreign exchange rates. The Bank is exposed to currency risk in performing transactions in foreign currencies and foreign-currency denominated financial instruments.

As a result of the currency Board in place in Bulgaria, the Bulgarian currency is pegged to the Euro. As the currency in which the Bank presents it financial statements is the Bulgarian lev, the Bank's financial statements are effected by movements in the exchange rates between the Bulgarian lev and currencies other than the Euro.

The Bank's transactional exposures give rise to foreign currency gains and losses that are recognised in profit or loss. These exposures comprise the monetary assets and monetary liabilities of the Bank that are not denominated in the presentation currency of the Bank. These exposures were as follows:

in BGN '000	2011	2010
Monetary assets		
Euro	4,339,864	3,405,131
US dollar	421,496	379,669
Other	62,176	40,710
Gold bullion	7,856	6,603
Monetary liabilities		
Euro	2,909,370	2,458,966
US dollar	422,616	380,715
Other	61,577	40,385
Gold bullion	-	-
Net position		
Euro	1,430,494	946,165
US dollar	(1,120)	(1,046)
Other	599	325
Gold bullion	7,856	6,603

In respect of monetary assets and liabilities in foreign currencies that are not economically hedged, the Bank manages foreign currency risk in line with policy that sets limits on currency positions and dealer limits.

#### (iii) Credit risk

Credit risk is the risk that a counterparty to a financial instrument will cause a financial loss for the Bank by failing to discharge an obligation. The Bank is subject to credit risk through its lending activities and in cases where it acts as an intermediary on behalf of customers or other third parties or issues guarantees. The management of the credit risk exposures to borrowers is conducted through regular analysis of the borrowers' credit worthiness and the assignment of a rating grade. Exposure to credit risk is also managed in part by obtaining collateral and guarantees.

The Bank's primary exposure to credit risk arises through its loans and advances. The amount of credit exposure in this regard is represented by the carrying amounts of the assets on the balance sheet. These exposures are as follows:



- 3. Risk management disclosures, continued
- B. Non-trading activities, continued
- (iii) Credit risk, continued

31 December 2011		in BGN '000 Carrying amount of
	Gross amount of loans and	loans and advances to
Class of exposure	advances to customers	customers
Collectively impaired		
Standard	3,607,040	3,603,069
Individually impaired		
Watch	404,324	388,558
Nonperforming	29,789	21,151
Loss	216,337	114,224
Total	4,257,490	4,127,002
31 December 2010	Gross amount of loans and	in BGN '000 Carrying amount of loans and advances to
Class of exposure	advances to customers	customers
Collectively impaired Standard Individually impaired	3,019,146	3,015,854
Watch	310,071	303,551
Nonperforming	25,369	21,948
Loss	116,775	33,809
Total	3,471,361	3,375,162

In addition, the Bank is exposed to off-balance sheet credit risk through commitments to extend credits and issue contingent liabilities (See Note 32).

Concentrations of credit risk (whether on or off balance sheet) that arise from financial instruments exist for counterparties when they have similar economic characteristics that would cause their ability to meet contractual obligations to be similarly affected by changes in economic or other conditions.

The major concentrations of credit risk arise by location and type of customer in relation to the Group's investments, loans and advances and off-balance sheet commitments.



- 3. Risk management disclosures, continued
- B. Non-trading activities, continued
- (iii) Credit risk, continued

Total economic sector credit risk concentrations in loans and advances to customers are presented in the table below:

in BGN '000	2011	2010
Trade	946,338	886,576
Industry	1,125,835	663,900
Services	433,874	232,960
Finance	87,849	37,683
Transport, logistics	270,019	253,646
Communications	56,221	37,952
Construction	173,246	161,971
Agriculture	85,353	73,802
Tourist services	117,310	134,041
Infrastructure	161,993	142,906
Private individuals	786,291	721,886
Other	13,161	124,038
Allowance for impairment	(130,488)	(96,199)
Total	4,127,002	3,375,162

The Bank has extended loans to enterprises involved in different types of activities but within the same economic sector - industry. As such the exposures share a similar industry risk. There are three such groups of enterprises at 31 December 2011 with total exposures amounting to BGN 116,335 thousand (2010: BGN 78,336 thousand) – ferrous and non-ferrous metals, BGN 61,015 thousand (2010: BGN 68,850 thousand) – mining and BGN 104,836 thousand (2010: BGN 108,113 thousand) – power engineering.

The Bank has extended loans, confirmed letters of credit and granted guarantees to 23 individual clients or groups (2010: 18) with each individual exposure exceeding 10% of the capital base of the Bank. The total amount of these exposures is BGN 1,776,991 thousand which represents 321.11% of the capital base (2010: BGN 1,373,939 thousand which represented 284.54 % of the capital base) of which BGN 1,351,454 thousand (2010: BGN 1,150,431 thousand) represent loans and BGN 185,691 thousand (2010: BGN 223,508 thousand) represent guarantees, letters of credit and other commitments.

Loans extended by the branch in Cyprus amount to BGN 290,861 thousand (gross carrying amount before any allowances) (2010: BGN 214,895 thousand).

The amounts reflected in the tables represent the maximum accounting loss that would be recognised at the statement of financial position date if counterparts failed completely to perform as contracted and any collateral or security proved to be of no value. The amounts, therefore, greatly exceed expected losses, which are included in the allowance for impairment.



#### 3. Risk management disclosures, continued

#### B. Non-trading activities, continued

## (iii) Credit risk, continued

The Bank's policy is to require suitable collateral to be provided by certain customers prior to the disbursement of approved loans. Guarantees and letters of credit are also subject to strict credit assessments before being provided. The agreements specify monetary limits to the Bank's obligations. The extent of collateral held for guarantees and letters of credit is 100 percent.

Collateral for loans, guarantees, and letters of credit is usually in the form of mortgage, cash, plant and equipment, securities, or other property.

The table below shows a breakdown of total loans and advances extended to customers by the Bank by type of collateral, excluding credit cards in the amount of BGN 193,303 thousand (2010: BGN 178,755 thousand):

in BGN '000	2011	2010
Mortgage	1,642,857	1,452,763
Pledge of receivables	201,992	246,679
Pledge of commercial enterprise	789,238	443,798
Securities	80,069	130,044
Guarantee	13,759	7,127
Other guaranties	464,606	303,529
Pledge of goods	185,502	164,799
Pledge of machines	200,925	218,747
Money deposit	45,797	37,146
Stake in capital	144,694	29,013
Gold	18	18
Other collateral	247,465	225,980
Unsecured	47,265	32,963
Total	4,064,187	3,292,606

Other collateral includes insurance policies up to the amount of the insurance cover, future receivables, remuneration transfers, etc.

#### (iv) Government debt exposures

During the year ended 31 December 2011, concerns became apparent of the credit risk related to government debt issued by member states of the Eurozone. The Bank closely manages this risk throughout the year and as a result the overall quality of the government debt portfolio is very high.

The table below shows the carrying amount of the government debt portfolio by country issuer. The assets are presented without any allowance for impairment. The Bank does not recognise allowance for impairment against the exposures which are measured at amortised cost as at 31 December 2011 and 31 December 2010 as well as those classified as available for sale.



- 3. Risk management disclosures, continued
- B. Non-trading activities, continued
- (iv) Government debt exposures, continued

in BGN '000 31 December 2011

31 December 2011			Belgium
Portfolio	Bulgaria	France	Deigiam
Financial assets held for trading	5,523	-	-
Available for sale investments	103,222	371,465	136,894
Financial assets held to maturity	36,054	-	-
Total	144,799	371,465	136,894

in BGN '000

31 December 2010 Bulgaria The Netherlands Portfolio **France Belgium** Financial assets held for trading 11,472 Available for sale investments 40,309 273.446 234.377 117.158 Financial assets held to maturity 29,371 **Total** 81,152 273,446 234,377 117,158

## Maturity table of government debt securities by country issuer as at 31 December 2011

in BGN '000

Country issuer	Up to 1 Month	From 1 to 3 Months	From 3 months to 1 year	From 1 to 5 years	Over 5 years	Total
Bulgaria	-	-	-	120,518	24,281	144,799
France	97,782	195,552	78,131	-	-	371,465
Belgium	136,894	-	-	-	-	136,894
Total	234,676	195,552	78,131	120,518	24,281	653,158

## Maturity table of government debt securities by country issuer as at 31 December 2010

in BGN '000

Country issuer	Up to 1 Month	From 1 to 3 Months	From 3 months to 1 year	From 1 to 5 years	Over 5 years	Total
Bulgaria	5,394	1,391	13,720	33,337	27,310	81,152
France	58,651	78,196	136,599	-	-	273,446
Belgium	58,646	78,167	97,564	-	-	234,377
The Netherlands	-	78,147	39,011	-	-	117,158
Total	122,691	235,901	286,894	33,337	27,310	706,133

## 3. Risk management disclosures, continued

# C. Solvency ratio (Capital adequacy)

The Bank's lead regulator, the Bulgarian National Bank (BNB) sets and monitors capital requirements both on consolidated and stand-alone basis. BNB issued Ordinance 8 on Capital Adequacy of Credit Institutions



effective from 01 January 2007 that is the Bulgarian supervisory implementation of the International Convergence of Capital Measurement and Capital Standards (Revised Framework), known as Basel II and complies with EU Directives 2006/48/EC and 2006/49/EC. In implementing current capital requirements the Bank is required to maintain a minimum prescribed ratio of 12% of total capital to total risk-weighted assets and a minimum prescribed ratio of 6% of Tier 1 capital to total risk-weighted assets. Banking operations are categorised as either trading book or banking book, and risk-weighted assets are determined according to specified requirements that seek to reflect the varying levels of risk attached to assets and off-balance sheet exposures. As the Bank holds insignificant trading book, the Bank does not apply capital requirements to its exposures in trading portfolio in respect to market risk and calculates required capital for trading instruments in accordance with the provisions for banking book.

The Bank calculates requirements for credit risk for its exposures in banking and trading portfolios based on standardised approach defined by the BNB. Exposures are taken into account using their balance sheet amount. Off-balance-sheet credit-related commitments are taken into account by applying different categories of conversion factors (0%, 20%, 50%, 100%), designed to convert these items into balance sheet equivalents. The resulting equivalent amounts are then weighted for risk using different percentages (0%, 20%, 50%, 100%) depending on the class of exposure and its credit rating assessment. Various credit risk mitigation techniques are used, for example collateralised transactions and guarantees. Forwards and options based derivative instruments are weighted for counterparty credit risk.

The Bank calculates also capital requirements for market risk for foreign currency and commodity instruments in trading book and banking book.

In addition, the Bank is required to hold capital for operational risk. The basic indicator approach is used. Required capital is equal to the average gross annual income over the previous three years multiplied by a fixed percentage (15%). Respective risk weighted assets are calculated by further multiplication by 12.5.

The Bank's regulatory capital is analysed into two tiers:

- Tier 1 capital, which includes ordinary share capital, share premium, statutory reserve, other general reserves, current half-year audited profit and hybrid instruments without incentive to redeem after deductions for goodwill and other intangible assets and unrealised loss from available for sale investments.
- Tier 2 capital, which includes qualifying subordinated liabilities, namely perpetual debt and subordinated term debt.

Following limits are applied to elements of the capital base: qualifying tier 2 capital cannot exceed tier 1 capital; qualifying term subordinated loan capital may not exceed 50 percent of tier 1 capital; and qualifying hybrid debt without incentive to redeem cannot exceed 35 percent of tier 1 capital. Deductions from the Bank's capital base include the balance-sheet value of unconsolidated investments in subsidiaries and specific provisions for credit risk.

The Bank has complied with all externally imposed capital requirements throughout the period.



# 3. Risk management disclosures, continued

# C. Capital adequacy, continued

Capital adequacy level was as follows:

in BGN '000	Balance sheet/noti	onal amount	Risk weighted assets		
	2011	2010	2011	2010	
Risk weighted assets for credit risk					
Balance sheet assets					
Exposure class					
Central governments and central banks	1,293,965	1,077,364	2,956	2,552	
Institutions	290,595	122,539	78,140	37,333	
Corporates	3,135,180	2,472,957	3,079,542	2,444,667	
Retail	468,354	459,993	340,731	333,007	
Claims secured by residential property	393,051	383,677	137,568	134,287	
Overdue items	121,995	47,848	121,995	47,848	
Collective investment undertaking	1,936	2,100	1,936	2,100	
Other items	327,252	316,241	193,667	190,302	
Total	6,032,328	4,882,719	3,956,535	3,192,096	
Off balance sheet items					
Exposure class					
Central governments and central banks	97	851	-	-	
Institutions	15,266	15,464	3,458	3,468	
Corporates	552,625	465,959	179,903	187,035	
Retail	231,706	194,927	1,350	1,029	
Claims secured by residential property	3,468	4,109	601	708	
Other items	-	-	14	13	
Total	803,162	681,310	185,326	192,253	
Derivatives					
Exposure class					
Central governments and central banks	1,760	-	-	-	
Institutions	171	830	34	166	
Corporates	390	72	390	72	
Total	2,321	902	424	238	
Total risk-weighted assets for credit risk	,		4,142,285	3,384,587	
Risk-weighted assets for market risk			5,546	5,988	
Risk-weighted assets for operational risk			344,453	345,650	
Total risk-weighted assets			4,492,284	3,736,225	
Capital adequacy ratios	Capita	ı	Capital ratios %		
Capital adoquacy latto	2011	2010	2011	2010	
Tier 1 Capital	461,959	384,513	10.28%	10.29%	
Total capital base	553,392	482,861	12.32%	12.92%	
-		•			



## 4. Segment Reporting

Segment information is presented in respect of the Bank's geographical segments. The primary format, geographical segments, is based on the Bank's management and internal reporting structure.

Reporting and measurement of segment assets and liabilities and segment revenues and results is based on the accounting policies set out in the accounting policy notes.

Transactions between segments are conducted on an arm's length basis.

The Bank operates principally in Bulgaria, but also has operations in Cyprus.

In presenting information on the basis of geographical segments, revenue and operating income is allocated based on the location of the Bank branch that generated the revenue. Segment assets and liabilities are allocated based on their geographical location.

in BGN '000	Bulgarian operations		Foreign operations		Total		
	2011	2010	2011	2010	2011	2010	
Interest income Interest expense and similar charges: Net interest income	408,978	374,447	23,632	18,234	432,610	392,681	
	(275,536)	(257,924)	(645)	(1,006)	(276,181)	(258,930)	
	133,442	116,523	22,987	17,228	156,429	133,751	
Fee and commission income Fee and commission expense Net fee and commission income	78,553	61,371	394	439	78,947	61,810	
	(8,156)	(7,439)	(10)	(12)	(8,166)	(7,451)	
	70,397	53,932	384	427	70,781	54,359	
Net trading income	11,068	8,272	49	47	11,117	8,319	
Administrative expenses	(149,861)	(136,543)	(500)	(507)	(150,361)	(137,050)	
	2011	2010	2011	2010	2011	2010	
Assets	5,805,179	4,723,097	296,490	220,986	6,101,669	4,944,083	
Liabilities	5,602,298	4,484,892	22,326	19,427	5,624,624	4,504,319	



# 4. Segment Reporting, continued

The table below shows assets and liabilities and income and expense by business segments as at 31 December 2011.

in BGN '000

Business	Assets	Liabilities	Interest income	Interest expense and similar charges:	Net fee and commission income	Net trading income	Other net operating expense
Commercial banking	3,379,993	1.203.247	327,058	(58,195)	42.710		
Retail Banking	747,009	4,363,752	94,171	(215,777)	13,615	- -	-
Card business	-	-	-	-	13,818	-	-
Liquidity ratio	1,712,651	50,142	11,381	(2,187)	14	3,943	(2,192)
Dealing	9,174	-	-	-	(137)	7,174	-
Other	252,842	7,483	-	(22)	761	-	
Total	6,101,669	5,624,624	432,610	(276,181)	70,781	11,117	(2,192)



# 5. Financial assets and liabilities Accounting classification and fair values

The table below sets out the classification of each class of financial assets and liabilities, and their fair values as at 31 December 2011.

		Held-to-	Loans and	Available-for-	Other at amortised		Net book	
in BGN '000	Trading	maturity	receivables	sale	cost	Other	value	Fair value
ASSETS	•	•						
Cash and balances with								
Central Banks	-	-	785,868	-	-	127,730	913,598	913,598
Financial assets held for	0.650						0.650	0.650
trading Available for sale	8,659	-	-	-	-	-	8,659	8,659
investments	_	_	_	680,924	_	_	680,924	680,924
Financial assets held to				000,024			000,024	000,024
maturity	-	54,961	-	-	-	-	54,961	54,598
Loans and advances to								
banks and other financial								
institutions	-	-	100,054	-	-	-	100,054	100,054
Loans and advances to			4.407.000				4.407.000	4 407 000
customers		-	4,127,002	-	-	-	4,127,002	4,127,002
Total	8,659	54,961	5,012,924	680,924	-	127,730	5,885,198	5,884,835
LIADUITIEO								
LIABILITIES  Due to banks					2,054		2,054	2,054
Due to other customers	-	-	-	-	5,286,891	-	5,286,891	5,286,891
Liabilities evidenced by	-	-	-	-	5,200,091	-	5,200,091	5,200,091
paper	_	_	_	_	132,443	_	132,443	132,443
Subordinated term debt		_		_	50,596		50,596	50,596
Perpetual debt	_	_	_	_	102,357	_	102,357	102,357
Hybrid debt	_	_	_	_	42,800	_	42,800	42,800
Other financial liabilities	-	=	=	=	-	358	358	358
Total	-	-	-	-	5,617,141	358	5,617,499	5,617,499

The fair value of cash, cash equivalents, demand and term deposits is approximately equal to the carrying value given, because of their short-term maturity. The fair value of receivables from clients is approximately equal to their balance-sheet value due to the fact that the interest rate for most of the loan portfolio is floating and reflects changes in market conditions. The fair value of liabilities evidenced by paper is approximately equal to their carrying value due to the fact that the main part of liabilities evidenced by paper are either with short-term maturity or carry floating interest rates which reflect the changes in the market conditions.



## 5. Financial assets and liabilities, continued

## Accounting classification and fair values, continued

The table below sets out the classification of each class of financial assets and liabilities, and their fair values as at 31 December 2010.

		Held-to-	Loans and		Other at amortised		Net book	
in BGN '000	Trading	maturity	receivables	Available-for-sale	cost	Other	value	Fair value
ASSETS	aag	matanty	10001145100	/ (valiable for cale	0001	0 11.10.	value	run valuo
Cash and balances with								
Central Banks	-	-	425,316	-	-	120,965	546,281	546,281
Financial assets held for								
trading	16,641	-	-	-	-	-	16,641	16,641
Available for sale								
investments	-	-	-	743,217	-	-	743,217	743,217
Financial assets held to		00.007					00.007	00.054
maturity	-	38,207	-	-	-	-	38,207	38,054
Loans and advances to banks and other financial								
institutions	_	_	20,924	_	_	_	20,924	20,924
Loans and advances to	_	_	20,324	_	_	_	20,924	20,324
customers	_	_	3,375,162	_	_	_	3,375,162	3,375,162
Total	16,641	38,207	3,821,402	743,217	-	120,965	4,740,432	4,740,279
	-,-					-,	, -, -	
LIABILITIES								
Due to banks	_	-	-	-	9,509	-	9,509	9,509
Due to other customers	-	-	-	=	4,205,020	-	4,205,020	4,205,020
Liabilities evidenced by								
paper	-	-	-	-	133,804	-	133,804	133,804
Subordinated term debt	-	-	-	-	47,169	-	47,169	47,169
Perpetual debt	-	-	-	-	101,888		101,888	101,888
Other financial liabilities	-	-	-	-		247	247	247
Total	-	-	-	•	4,497,390	247	4,497,637	4,497,637



### 6. Net interest income

in BGN '000	2011	2010
Interest income		
Accounts with and placements to banks and financial		
institutions	3,320	1,328
Retail Banking	90,826	87,590
Corporate customers	304,155	267,112
Small and medium enterprises	22,903	25,825
Microlending	3,345	3,942
Debt instruments	8,061	6,884
	432,610	392,681
Interest expense and similar charges:		
Deposits from banks	(720)	(7)
Deposits from other customers	(247,019)	(235,222)
Liabilities evidenced by paper	(5,469)	(5,682)
Subordinated term debt	(6,867)	(5,884)
Perpetual debt	(12,071)	(12,095)
Hybrid debt	(4,013)	-
Lease agreements and other	(22)	(40)
	(276,181)	(258,930)
Net interest income	156,429	133,751

For 2011 the recognized interest income from individually impaired financial assets (loans to customers) amounted to BGN 40,276 thousand (2010: BGN 31,302 thousand).

### 7. Net fee and commission income

in BGN '000

Fee and commission income	2011	2010
Letters of credit and guarantees	8,443	6,181
Payments transactions	9,050	7,968
Customer accounts	15,922	13,620
Cards business	20,334	19,593
Other	25,198	14,448
	78,947	61,810
Fee and commission expense		
Letters of credit and guarantees	(804)	(288)
Deposits to banks and other financial institutions	(668)	(796)
Cards business	(6,516)	(6,159)
Other	(178)	(208)
	(8,166)	(7,451)
Net fee and commission income	70,781	54,359



### 8. Net trading income

	2011	2010
in BGN '000		
Net trading income/(expense) arises from:		
- Debt instruments	3,943	943
- Equities	(284)	30
<ul> <li>Foreign exchange rate fluctuations</li> </ul>	7,458	7,346
Net trading income	11,117	8,319
9. Other net operating income/(expense)		
in BGN '000	2011	2010
Other net operating income/(expense) from:	arising	
- Debt instruments	(2,192)	449
- Equities	-	4,016
- other	-	86
Other net operating income/(expense)	(2,192)	4,551
10. Administrative expenses		
in BGN '000	2011	2010
General and administrative expenses compris	e:	
- Personnel cost	48,486	41,795
<ul> <li>Depreciation and amortisation</li> </ul>	21,160	20,522
- Advertising	6,286	4,775
<ul> <li>Building rent expense</li> <li>Telecommunication, software and other cor</li> </ul>	25,527	25,497
maintenance	11,148	10,797
- Unclaimable VAT	9,696	9,764
- Administration, consultancy, audit and other		23,900
Administrative expenses	150,361	137,050

Personnel costs include salaries, social and health security contributions under the provisions of the local legislation. At 31 December 2011 the total number of employees was 2,680 (31 December 2010: 2,547).



# 11. Allowance for impairment

Impairment, net	(34,370)	(25,666)
Loans and advances to customers	10,452	11,164
Reversal of write-downs		
Write-downs Loans and advances to customers	(44,822)	(36,830)
in BGN '000	2011	2010

# 12. Income tax expense

	2011	2010
Current taxes Deferred taxes (See Note 21) Income tax expense	(3,622) (485) <b>(4,107)</b>	(2,182) (1,262) <b>(3,444)</b>
Reconciliation between tax expense and the accounting profit is as follows:		
in BGN '000	2011	2010
Accounting profit before taxation	40,610	34,282
Corporate tax at applicable tax rate (10% for 2011 and 10% for 2010)  Tax effect of permanent tax differences  Tax effect of reversals of temporary differences  Income tax expense  Effective tax rate	4,061 (439) 485 <b>4,107</b> 10.11%	3,428 (1,246) 1,262 3,444 10.05%



## 13. Cash and balances with Central Banks

in BGN '000	2011	2010
Cash on hand		
- in BGN	91,315	85,316
- in foreign currency	36,415	35,649
Balances with Central Banks	645,225	374,325
Current accounts and amounts with local banks	-	7,000
Current accounts and amounts with foreign banks	140,643	43,991
Total	913,598	546,281
14. Financial assets held for trading		
in BGN '000	2011	2010
Bonds and notes issued by:		
Bulgarian government, rated BBB:		
- denominated in Bulgarian Leva	3,518	3,898
- denominated in foreign currencies	2,005	7,574
Bulgarian banks assessed with BBB- rating	-	1,956
Other issuers – equity instruments (unrated)	3,136	3,213
Total	8,659	16,641
15. Available for sale investments		
In thousands of BGN	2011	2010
Bonds and notes issued by:		
Bulgarian Government		
<ul> <li>denominated in Bulgarian Leva</li> </ul>	17,688	31,512
<ul> <li>denominated in foreign currencies</li> </ul>	85,534	8,797
Foreign governments treasury bills	508,359	624,981
Foreign banks and other financial institutions	26,934	37,552
Other issuers – equity instruments	6,038	6,019
Investments in subsidiaries	36,371	34,356
Total	680,924	743,217



### 15. Available for sale investments, continued

Investments in subsidiaries are as follows:

In thousands of BGN

Entity:	% held	2011	2010
First Investment Finance B.V., Netherlands	100%	3,947	3,947
Diners Club Bulgaria AD	94.79%	5,443	5,443
First Investment Bank - Albania Sh.a.	100%	23,419	21,464
Debita OOD	70%	105	105
Realtor OOD	51%	77	77
Health Insurance Fund Fi Health AD	59.10%	3,315	3,305
Framas Enterprises Limited	100%	15	15
Balkan Financial Services EOOD	100%	50	
Total		36,371	34,356

### 16. Financial assets held to maturity

Long-term securities held to maturity represent debt investments that the Bank has the intent and ability to hold to maturity.

in BGN '000	2011	2010
Securities held to maturity issued by:		
Bulgarian Government	36,054	29,371
Foreign banks and other financial institutions	18,907	8,836
Total	54,961	38,207

### 17. Loans and advances to banks and other financial institutions

### (a) Analysis by type

Receivables under resale agreements (see Note 30)	12,683	5,910
Other	2,232	2,510
Total	100,054	20,924

## (b) Geographical analysis

Total	100,054	20,924
Foreign banks and other financial institutions	86,961	14,735
Domestic banks and financial institutions	13,093	6,189
in BGN '000	2011	2010



### 18. Loans and advances to customers

in BGN '000	2011	2010
Retail Banking		
- Consumer loans	233,107	196,054
- Mortgage loans	344,437	346,854
- Credit cards	193,303	178,755
Small and medium enterprises	223,990	207,045
Microlending	26,612	27,017
Corporate customers	3,236,041	2,515,636
Allowance for impairment	(130,488)	(96,199)
Total	4,127,002	3,375,162
(a) Movement in impairment allowances		
in BGN '000		
Balance as at 1 January 2011	_	96,199
Additional allowances		44,822
Amounts released		(10,452)
Write - offs		(81)
Balance at 31 December 2011		130,488



19. Property and equipment

in BGN '000	Land and	Fixtures and fittings	Motor vehicles	Assets under Construction	Leasehold	Total
	Buildings	nungs	WOLDI VEHICLES	Construction	Improvements	Total
Cost	40.000	400.000	E 74E	0.4.700	40.500	000 007
At 1 January 2010	10,829	102,269	5,715	34,796	46,598	200,207
Additions	-	/	- 	16,775	-	16,782
Disposals	(448)	(3,478)	(79)	(463)	(202)	(4,670)
Transfers	2,258	14,128	274	(26,440)	9,502	(278)
At 31 December 2010	12,639	112,926	5,910	24,668	55,898	212,041
Additions	-	72	-	10,219	-	10,291
Disposals	-	(833)	(298)	(58)	(88)	(1,277)
Transfers	276	4,850	228	(8,438)	2,985	(99)
At 31 December 2011	12,915	117,015	5,840	26,391	58,795	220,956
Amortisation						
At 1 January 2010	3,410	52,500	4,191	-	12,423	72,524
Начислена през годината	378	14,181	745	-	3,146	18,450
On disposals	(209)	(3,352)	(79)	-	(202)	(3,842)
At 31 December 2010	3,579	63,329	4,857	-	15,367	87,132
Charge for the period	438	14,362	601	-	3,682	19,083
On disposals	-	(825)	(298)	-	(78)	(1,201)
At 31 December 2011	4,017	76,866	5,160	-	18,971	105,014
Net book value						
At 1 January 2010	7,419	49,769	1,524	34,796	34,175	127,683
At 31 December 2010	9,060	49,597	1,053	24,668	40,531	124,909
At 31 December 2011	8,898	40,149	680	26,391	39,824	115,942



# 20. Intangible assets

in BGN '000	Software and licences	Total
Cost		
At 1 January 2010	22,161	22,161
Additions	-	-
Disposals	(745)	(745)
Transfers	278	278
At 31 December 2010	21,694	21,694
Additions	-	-
Disposals	(4)	(4)
Transfers	99	99
At 31 December 2011	21,789	21,789
Amortisation		
At 1 January 2010	4,046	4,046
Начислена през годината	2,072	2,072
On disposals	(745)	(745)
At 31 December 2010	5,373	5,373
Charge for the period	2,077	2,077
On disposals	(4)	(4)
At 31 December 2011	7,446	7,446
Net book value		
At 1 January 2010	18,115	18,115
At 31 December 2010	16,321	16,321
At 31 December 2011	14,343	14,343



### 21. Deferred Taxation

Deferred income taxes are calculated on all temporary differences under the liability method using a principal tax rate of 10%.

Deferred income tax balances are attributable to the following items:

: PON (000	Assets	i	Liabiliti	es	Net	
in BGN '000	2011	2010	2011	2010	2011	2010
Property, equipment and intangibles	-	-	3,502	3,017	3,502	3,017
Other	(208)	(208)	334	334	126	126
Net tax (assets)/liabilities	(208)	(208)	3,836	3,351	3,628	3,143

Movements in temporary differences in 2011 at the amount of BGN 485 thousand are recognised in net profit for the period.

### 22. Other assets

in BGN '000	2011	2010
Deferred expense	10,139	9,833
Gold bullion	7,856	6,603
Other assets	63,642	39,476
Total	81,637	55,912

### 23. Due to banks

in BGN '000	2011	2010
Term deposits	-	7,000
Payable on demand	2,054	2,509
Total	2,054	9,509

### 24. Due to other customers

in BGN '000	2011	2010
Retail customers - current accounts - term and savings deposits	412,152 3,951,600	341,309 3,208,171
Businesses and public institutions - current accounts - term and savings deposits	308,835 614,304	253,279 402,261
Total	5,286,891	4,205,020



### 25. Liabilities evidenced by paper

in BGN '000	2011	2010
Acceptances under letters of credit Liabilities under repurchase agreements (see Note 30) Other term liabilities	9,217 48,088 75,138	15,375 38,287 80,142
Total	132,443	133,804

Other term liabilities comprise mainly financing obtained from financial institutions through extension of loan facilities.

#### 26. Subordinated term debt

As at 31 December 2011 the Bank has entered into six separate subordinated Loan Agreements. All these subordinated Loan Agreements are governed by English Law and the funds raised outside the Republic of Bulgaria.

Subordinated liabilities can be analysed as follows:

#### in BGN '000

Lender	Principal amount	Final maturity	Maturity	Amortised cost as at 31 December 2008
Growth Management Limited	5,867	10 years	27.08.2014	15,175
Growth Management Limited	3,912	10 years	24.02.2015	7,820
Hillside Apex Fund Limited	9,779	10 years	01.03.2015	9,839
Growth Management Limited ING Bank NV/ Atlantic	1,956	10 years	17.03.2015	3,856
Forfaitierungs AG	9,779	10 years	22.04.2015	9,721
Hypo-Alpe-Adria Bank	3,912	10 years	14.04.2015	4,185
Total	35,205			50,596

The treatment of subordinated term debt for capital adequacy purposes as Tier 2 capital is in accordance with the requirements of the local legislation. Any prepayment of subordinated debt prior to its final maturity is subject to written approval from the Bulgarian National Bank.



### 27. Perpetual debt

in BGN '000

	Principal amount	Amortised cost as at 31 December 2011
Step-up Guaranteed Perpetual Subordinated Bonds EUR 27 mio	52,807	56,787
Step-up Guaranteed Perpetual Subordinated Bonds EUR 21 mio	41,073	45,570
Total	93,880	102,357

The issue of the Step-Up Subordinated Bonds by First Investment Finance B.V., a limited liability company registered under the laws of the Netherlands and 100% owned by First Investment Bank AD was fully guaranteed by the Bank. The terms and conditions of the debt capital insturments fully comply with Ordinance 8 on Capital Adequacy of Credit Institutions issued by BNB. The amounts received for the perpetual subordinated bonds are included in Tier 2 capital after respective Permissions by Bulgarian National Bank.

#### 28. Hybrid debt

in BGN '000

	Principal amount	Amortised cost as at 31 December 2011
Hybrid debt with original principal EUR 21 mio	39,117	42,800
Total	39,117	42,800

In March 2011 the Bank issued a hybrid instrument (bond issue) and, after obtaining permission from the Bulgarian National Bank, included it as Tier 1 capital pursuant to Art. 3a of Ordinance 8 on Capital Adequacy of Credit Institutions. The Bank placed the bond issue under private subscription with a total nominal and issue value of EUR 20,000 thousand, constituting the first tranche of a bond issue for up to EUR 40,000 thousand. The bonds are registered, dematerialized, interest-bearing, perpetual, unsecured, freely transferable, non-convertible, deeply subordinated and without incentive to redeem.

#### 29. Other liabilities

in BGN '000	2011	2010
Liabilities to personnel	1,746	1,807
Other payables	1,463	729
Total	3,209	2,536



### 30. Repurchase and resale agreements

The Bank raises funds by selling financial instruments under agreements to repay the funds by repurchasing the instruments at future dates at the same price plus interest at a predetermined rate. Repurchase agreements are commonly used as a tool for short-term financing of interest-bearing assets, depending on the prevailing interest rates. At 31 December 2011 assets sold under repurchase agreements were as follows:

in BGN '000	Fair value of underlying assets	Carrying amount of corresponding liabilities
Bulgarian government securities	23,123	22,740
Other government securities	25,264	25,348
Total	48,387	48,088

At 31 December 2010 assets sold under repurchase agreements were as follows:

in BGN '000	Fair value of underlying assets	Carrying amount of corresponding liabilities
Bulgarian government securities	1,938	1,970
Other government securities	38,303	36,317
Total	40,241	38,287

The Bank also purchases financial instrument under agreements to resell them at future dates ("reverse repurchase agreements"). The seller commits to repurchase the same or similar instruments at an agreed future date. Reverse repurchases are entered into as a facility to provide funds of customers. At 31 December 2011 assests purcased subject to agreements to resell them are as follows:

in BGN '000	Fair value of underlying assets	Carrying amount of liabilities
Bulgarian government securities	12,913	12,683
Total	12,913	12,683

At 31 December 2010 assets purchased under repurchase agreements were as follows.

in BGN '000

	Fair value of underlying assets	Carrying amount of liabilities
Bulgarian government securities	5,863	5,910
Total	5,863	5,910



#### 31. Capital and reserves

#### (a) Number and face value of registered shares as at 31 December 2011

As at 31 December 2011 the registered share capital of the Bank is BGN 110,000,000 divided into 110,000,000 ordinary dematerialized shares with voting rights of BGN 1 par value each. All shares have been fully paid up.

The share capital of the Bank was increased from BGN 100,000,000 to BGN 110,000,000 as a result of the successful IPO of new 10,000,000 dematerialized shares through the Bulgarian Stock Exchange – Sofia and was registered at the Commercial Register of Sofia City Court on 4 June 2007. In order to facilitate the IPO and prior to its launching the par value of the Bank's shares was reduced from BGN 10 to BGN 1 by a decision of the General Meeting of the Shareholders without affecting the aggregate amount of the share capital and the individual shareholdings.

### (b) Shareholders

The table below shows those shareholders of the Bank holding shares as at 31.12.11 together with the number and percentage of total issued shares.

	Number of shares	% of issued share capital
Mr. Ivailo Dimitrov Mutafchiev	31,830,000	28.94
Mr. Tzeko Todorov Minev	31,830,000	28.94
Legnano Enterprise Limited, Cyprus	8,450,000	7.68
Domenico Ventures Limited, British Virgin Islands	10,695,000	9.72
Rafaela Consultants Limited, British Virgin Islands	10,695,000	9.72
Other shareholders (shareholders holding shares subject to free trade on the Bulgarian Stock Exchange – Sofia)	16,500,000	15.00
Total	110,000,000	100.00



#### 31. Capital and reserves, continued

#### (b) Shareholders, continued

Currently all newly issued shares plus the part of the existing shares held by First Financial Brokerage House Ltd. sold to new investors under the IPO (a total of 16,500,000 shares) are freely traded on the floor of Bulgarian Stock Exchange – Sofia.

#### (c) Statutory reserve

Statutory reserves include amounts set aside for purposes regulated by local legislation. According to Bulgarian legislation the Bank is oblidged to set aside at least 1/10 of its annual profit as statutory reserve until the total amount of reserves reaches 1/10 of the Bank's share capital.

In 2011, as in the previous year, the Bank did not distribute dividends.

#### 32. Commitments and contingent liabilities

#### (a) Contingent liabilities

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 two years.

The contractual amounts of commitments and contingent liabilities are set out in the following table by category. The amounts reflected in the table for contingent liabilities represent the maximum accounting loss that would be recognised in the statement of financial position if counterparts failed completely to perform as contracted and any collateral or security proved to be of no value.

in BGN '000	2011	2010
Guarantee		
- in BGN	148,694	102,650
- in foreign currency	199,476	215,838
Total guarantees	348,170	318,488
Unused credit lines	360,847	280,124
Promissory notes	4,926	8,093
Letters of credit	89,219	74,605
Total	803,162	681,310

These commitments and contingent liabilities have off balance-sheet credit risk and only organization fees and accruals for probable losses are recognised in the statement of financial position until the commitments are fulfilled or expire. Most of the contingent liabilities and commitments will expire without being advanced in whole or in part. Therefore, the amounts do not represent expected future cash flows.

As at the date of the report there are no other significant contingent liabilities and commitments requiring additional disclosure.

At 31 December 2011 the extent of collateral held for guarantees and letters of credit is 100 percent.



### 33. Cash and cash equivalents

For the purposes of the cash flow statement, cash and cash equivalents comprises the following balances with less than 90 days original maturity:

in BGN '000

III BON 666	2011	2010
Cash and balances with Central Banks	913,598	546,281
Loans and advances to banks and financial institutions with original maturity less than 3 months	61,306	2,608
Total	974,904	548,889

## 34. Average balances

The average carrying amounts of financial assets and liabilities are set out in the table below. The amounts are calculated by using a simple average of monthly balances for all instruments.

in BGN '000	2011	2010
FINANCIAL ASSETS		
Cash and balances with Central Banks	732,041	581,789
Financial assets held for trading	18,068	12,164
Available for sale investments	624,541	563,003
Financial assets held to maturity	39,948	28,551
Loans and advances to banks and other financial institutions	62,468	22,636
Loans and advances to customers	3,819,234	3,129,658
FINANCIAL LIABILITIES		
Due to banks	23,861	3,433
Due to other customers	4,696,277	3,775,929
Liabilities evidenced by paper	139,393	164,734
Subordinated term debt	48,284	53,068
Perpetual debt	101,497	100,946
Hybrid debt	28,457	-



#### 35. Related party transactions

Parties are considered to be related if one party has the ability to control or exercise significant influence over the other party on making financial or operational decisions, or the parties are under common control with the Bank.

A number of banking transactions are entered into with related parties in the normal course of business. These include loans, deposits and other transactions. These transactions were carried out on commercial terms and at market rates. The volume of these transactions and outstanding balances at the end of respective periods are as follows:

Type of related party	or mana	Parties that control or manage the Bank		Enterprises under common control	
in BGN '000	2011	2010	2011	2010	
Loans					
Loans outstanding at beginning of the period	2,997	2,130	30,758	29,310	
Loans issued/(repaid) during the period	(1,323)	867	3,991	1,448	
Loans outstanding at end of the period	1,674	2,997	34,749	30,758	
Deposits and loans recieved: At beginning of the period Received/(paid) during the period At the end of the period	7,994 3,472 11,466	8,306 (312) 7,994	142,475 5,158 147,633	168,146 (25,671) 142,475	
Deposits placed					
Deposits at beginning of the period	-	-	3,922	3,912	
Deposits placed during the year		-	(6)	10	
Deposits at end of the period		-	3,916	3,922	
OFF-BALANCE SHEET COMMITMENTS ISSUED BY THE BANK	4.004	2 200	0.040	40.440	
At beginning of the period Issued/(expired) during the period	1,204 639	2,280 (1,076)	9,812 1,062	13,149 (3,337)	
At the end of the period	1,843	1,204	10,874	9,812	
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The key management personnel of the Bank received remunaration of BGN 6,319 thousand for 2011.

#### 36. Subsidiaries

### (a) First Investment Finance B.V.

In April 2003 the Bank created a special purpose entity, incorporated in the Netherlands, First Investment Finance B.V. The purpose for creating the entity is to accomplish a narrow and well-defined objective of receiving loans from foreign financial institutions and attracting investors by issuing bonds and other financial instruments guaranteed by the Bank. The entity's issued and paid up share capital is EUR 90 thousand divided into 900 ordinary shares, each with nominal value of EUR 100. 180 shares have been issued and paid up.



#### 36. Subsidiaries, continued

#### (b) Diners Club Bulgaria AD

In May 2005 the Bank acquired 80% of the share capital of Diners Club Bulgaria AD. The company was incorporated in 1996 as a franchise and processing agent of Diners Club International. As at 31 December 2011 the share capital of the company is BGN 610 thousand, and the Bank's shareholding is 94.79%.

### (c) First Investment Bank - Albania Sh.a.

In April 2006 the Bank acquired 99.9998% of the capital of First Investment Bank Albania Sh.a. upon its incorporation. On 27 June 2007 First Investment Bank – Albania was granted a full banking licence by the Bank of Albania, and on 1 September 2007 it effectively took over the activities of the former branch FIB – Tirana, assuming all rights and obligations, assets and liabilities.

As at 31 December 2011 the share capital of First Investment Bank – Albania Sh.a. was EUR 11,975 thousand, fully paid up, and the Bank's shareholding is 100%.

#### (d) Debita OOD and Realtor OOD

Acting jointly the Bank and First Financial Brokerage House OOD (FFBH) set up two new companies Debita OOD and Realtor OOD, which were entered in the Commercial Registry in January 2010. The capital of the two companies is BGN 150,000 each, distributed as follows:

- 1. Debita OOD 70%, i.e. 105,000 shares for the Bank and 30%, i.e. 45,000 shares for FFBH OOD.
- 2. Realtor OOD 51%, i.e. 76,500 shares for the Bank and 49%, i.e. 73,500 shares for FFBH OOD.

The companies were established as servicing companies within the meaning of Article 18 of the Law on Special Investment Purpose Companies. The main lines of business for Debita OOD include acquisition, servicing, management and disposal of receivables and the related consultancy services; the main lines of business for Realtor OOD include management, servicing and maintenance of real estate, construction and refurbishment works and consultancy in the field of real estate.

#### (e) Health Insurance Fund Fi Health AD

In the second half of 2010 the Bank acquired a majority stake capital of Health Insurance Fund FI Health AD (formerly Health Insurance Fund Prime Health AD), a company engaged in voluntary health insurance as well as acquisition, management and sale of investments in other companies. As at 31 December 2011 the share capital of the company is BGN 5,000 thousand, and the Bank's shareholding is 59.10%.

#### (f) Framas Enterprises Limited

In November 2010 the Bank acquired 10,000 shares, representing 100% of the issued share capital of Framas Enterprises Limited, British Virgin Islands, with the view of providing auxiliary services pursuant to Article 2 (4) of the Law on Credit Institutions.

#### (g) Balkan Financial Services EOOD

In February 2011 the Bank acquired 100 shares representing 100% of the capital of Balkan Financial Services OOD. The company is engaged in consultancy services related to implementation of financial information systems and software development.