To:

Financial Supervision Commission Investment Activity Supervision Department 16 Budapest Str. Sofia

CC:

Bulgarian Stock Exchange – Sofia Ad 6 Tri Ushi Str. Sofia

30 June 2021

Re: <u>Disclosure of Information by First Investment Bank AD pursuant to Regulation (EU)</u> No. 575/2013

Dear Sirs,

Please find attached Disclosure of Information by First Investment Bank AD pursuant to Regulation (EU) No. 575/2013 for 2020 on consolidated basis.

This disclosure of information was prepared in compliance with the requirements of Part Eight of Regulation (EU) No. 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms. The information is disclosed as a supplement to the consolidated annual report and the consolidated annual financial statements of First Investment Bank AD at 31.12.2020.

(signed) Nikola Bakalov Chief Executive Officer (signed)
Svetozar Popov
Executive Director



DISCLOSURE OF INFORMATION

pursuant to Regulation (EU) No. 575/2013

(consolidated data)

FIRST INVESTMENT BANK AD

for 2020



This disclosure of information was prepared in compliance with the requirements of Part Eight of Regulation (EU) No. 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms. The information is disclosed as a supplement to the consolidated annual report and the consolidated annual financial statements of First Investment Bank AD at 31.12.2020.



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RISK MANAGEMENT POLICY AND FRAMEWORK

(1) First Investment Bank has established, maintains and develops a risk management system which ensures the identification, assessment and management of risks inherent to its activity. The main objective in managing the overall risk profile of the Bank is to achieve a balance between risk, return and capital.

First Investment Bank assumes risks while ensuring the required level of equity capital and an effective management process. The Bank maintains financial resources that are commensurate with the volume and type of operations performed, with its risk profile and the internal control systems and mechanisms for risk management.

First Investment Bank AD determines an overall maximum level of risk by different types of risk. The Bank determines its risk propensity and risk tolerance levels so that they correspond to its strategic objectives and stable functioning.

In measuring risks First Investment Bank AD applies the Standardised Approach; for internal purposes it also applies internal rating models, internal VAR models, as well as scenario analyses and stress-tests.

(2) Reconciliation of balance sheet positions used for calculating own funds and those used for calculating the required own funds:

Balance-sheet positions	Accounting scope	Amount used for calculating the required own funds	Position in Annex VI
Assets			
Financial assets designated at fair value through profit or loss	1,095,293	-1,026	17
Intangible assets	16,018	-16,018	8, 41a
Loans and advances	6,358,334	164,202	
Own funds and liabilities	9,930,632	263,842	
Financial liabilities assessed at amortised cost	267,579	254,258	
of which: instruments eligible for DC1	9,623	9,584	32
of which: instruments eligible for T2			56
Equity	149,085	149,085	1
Premium reserve	250,017	250,017	1
Revaluation reserve on available for sale investments	18,434	18,434	3, 26а, 41в
Revaluation reserve on land and buildings	4,500	4,500	3, 26б, 56в
Reserve from translation of foreign operations	1,259	1,259	3
Retained earnings	747,672	703,526	3
Statutory reserve	39,861	39,861	3
Non-controlling interest	-	-	5

^{*} All amounts are in thousands of BGN.



(3) Information on the reconciliation of the elements of the regulatory own funds and the Bank's accounting capital and balance sheet as in the audited financial statements is presented in the table below:

Own funds	Regulation (EU) 575/2013	Applicable deduction percentage	31.12.2020
Share capital			149,085
Premium reserve			250,017
Revaluation reserve on available for sale investments			18,434
Revaluation reserve on land and buildings			4,500
Statutory reserve			39,861
Reserve from translation of foreign operations			1,259
Non-controlling interest			-
Retained earnings			747,672
Own funds in the audited financial statements of the institution	1		1,210,828
Unaudited annual profit			-44,147
Adjustments to CET1 due to IFRS 9 transitional arrangements	Art. 473, a		179,270
Indirect holdings of own Common Equity Tier 1 instruments	Art. 36, Para. 1 g	100%	-40
Intangible assets	Art. 36, Para. 1 b	100%	-16,018
Other deductions	Art. 36, Para. 1 a		-16,054
Common Equity Tier 1			1,313,839
Hybrid debt	Art. 51, 52	100%	254,258
Common Equity Tier 1			1,568,097
Perpetual debt	Art. 484, 486	-	9,584
Own funds			1,577,681



(4) Information on the main features of First Investment Bank capital instruments in the template under Annex II to Commission Implementing Regulation (EC) No. 1423/2013, is presented in the table below:

Tem	plate for disclosing information about the main features of capital instruments(1)	1
1	Issuer	First Investment Bank AD
2	Unique identification code (e.g., CUSIP, ISIN or Bloomberg in the case of private investing)	BG1100106050
3	Governing law(s) of the instrument	Bulgarian legislation
	Regulatory treatment	Common Equity Tier 1
4	Transitional CRR rules	Tier 1 Capital
5	Post-transitional CRR rules	Common Equity Tier 1
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary, registered, dematerialised, freely transferable shares with voting rights
8	Amount recognised in regulatory capital	100,000
9	Nominal amount of instrument	100,000
9a	Issue price	100%
9b	Redemption price	100%
10	Accounting classification	Share capital
11	Original date of issuance	1993 - 2006
12	Perpetual or dated	Perpetual
13	Original maturity date	not applicable
14	Issuer call subject to prior supervisory approval	yes
15	Optional call date, contingent call dates and redemption amount	not applicable
16	Subsequent call dates, if applicable	not applicable
	Coupons/dividends	
17	Fixed or floating dividend/coupon	not applicable
18	Coupon rate and any related index	not applicable
19	Existence of a dividend stopper	no
20a	Fully discretionary, partially discretionary or compulsory (in terms of timing)	not applicable
20b	Fully discretionary, partially discretionary or compulsory (in terms of amount)	not applicable
21	Existence of step up or other incentive to redeem	no
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	not applicable
24	If convertible, conversion trigger(s)	not applicable
25	If convertible, fully or partially	not applicable
26	If convertible, conversion rate	not applicable
27	If convertible, mandatory or optional conversion	not applicable
28	If convertible, specify instrument convertible into	not applicable
29	If convertible, specify issuer of instrument it converts into	not applicable
30	Write-down features	not applicable
31	If write-down, write-down trigger(s)	not applicable
32	If write-down, full or partial	not applicable
33	If write-down, permanent or temporary	not applicable
34	If temporary write-down, description of write-up mechanism	not applicable
35	Position in subordination hierarchy in liquidation (specify instrument immediately senior to instrument)	Subordinate to more senior lenders, incl. hybrid debt
36	Non-compliant features	No
37	If yes, specify non-compliant	not applicable



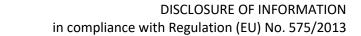
Tem	plate for disclosing information about the main features of capital instruments(1)	2
1	Issuer	First Investment Bank AD
2	Unique identification code (e.g., CUSIP, ISIN or Bloomberg in the case of private investing)	BG1100106050
3	Governing law(s) of the instrument	Bulgarian legislation
	Regulatory treatment	Common Equity Tier 1
4	Transitional CRR rules	Tier 1 Capital
5	Post-transitional CRR rules	Common Equity Tier 1
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary, registered, dematerialised, freely transferable shares with voting rights
8	Amount recognised in regulatory capital	10,000
9	Nominal amount of instrument	10,000
9a	Issue price	1,070%
9b	Redemption price	100%
10	Accounting classification	Share capital
11	Original date of issuance	04.6.2007
12	Perpetual or dated	Perpetual
13	Original maturity date	not applicable
14	Issuer call subject to prior supervisory approval	yes
15	Optional call date, contingent call dates and redemption amount	not applicable
16	Subsequent call dates, if applicable	not applicable
	Coupons/dividends	
17	Fixed or floating dividend/coupon	not applicable
18	Coupon rate and any related index	not applicable
19	Existence of a dividend stopper	no
20a	Fully discretionary, partially discretionary or compulsory (in terms of timing)	not applicable
20b	Fully discretionary, partially discretionary or compulsory (in terms of amount)	not applicable
21	Existence of step up or other incentive to redeem	no
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	not applicable
24	If convertible, conversion trigger(s)	not applicable
25	If convertible, fully or partially	not applicable
26	If convertible, conversion rate	not applicable
27	If convertible, mandatory or optional conversion	not applicable
28	If convertible, specify instrument convertible into	not applicable
29	If convertible, specify issuer of instrument it converts into	not applicable
30	Write-down features	not applicable
31	If write-down, write-down trigger(s)	not applicable
32	If write-down, full or partial	not applicable
33	If write-down, permanent or temporary	not applicable
34	If temporary write-down, description of write-up mechanism	not applicable
35	Position in subordination hierarchy in liquidation (specify instrument immediately senior to instrument)	Subordinate to more senior lenders, incl. hybrid debt
36	Non-compliant features	No
37	If yes, specify non-compliant	not applicable



Tem	plate for disclosing information about the main features of capital instruments(1)	2
1	Issuer	First Investment Bank AD
2	Unique identification code (e.g., CUSIP, ISIN or Bloomberg in the case of private investing)	BG1100106050
3	Governing law(s) of the instrument	Bulgarian legislation
	Regulatory treatment	Common Equity Tier 1
4	Transitional CRR rules	Tier 1 Capital
5	Post-transitional CRR rules	Common Equity Tier 1
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary, registered, dematerialised, freely transferable shares with voting rights
8	Amount recognised in regulatory capital	39,085
9	Nominal amount of instrument	39,085
9a	Issue price	491%
9b	Redemption price	100%
10	Accounting classification	Share capital
11	Original date of issuance	31.07.2020
12	Perpetual or dated	Perpetual
13	Original maturity date	not applicable
14	Issuer call subject to prior supervisory approval	yes
15	Optional call date, contingent call dates and redemption amount	not applicable
16	Subsequent call dates, if applicable	not applicable
	Coupons/dividends	
17	Fixed or floating dividend/coupon	not applicable
18	Coupon rate and any related index	not applicable
19	Existence of a dividend stopper	no
20a	Fully discretionary, partially discretionary or compulsory (in terms of timing)	not applicable
20b	Fully discretionary, partially discretionary or compulsory (in terms of amount)	not applicable
21	Existence of step up or other incentive to redeem	no
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	not applicable
24	If convertible, conversion trigger(s)	not applicable
25	If convertible, fully or partially	not applicable
26	If convertible, conversion rate	not applicable
27	If convertible, mandatory or optional conversion	not applicable
28	If convertible, specify instrument convertible into	not applicable
29	If convertible, specify issuer of instrument it converts into	not applicable
30	Write-down features	not applicable
31	If write-down, write-down trigger(s)	not applicable
32	If write-down, full or partial	not applicable
33	If write-down, permanent or temporary	not applicable
34	If temporary write-down, description of write-up mechanism	not applicable
35	Position in subordination hierarchy in liquidation (specify instrument immediately senior to instrument)	Subordinate to more senior lenders, incl. hybrid debt
36	Non-compliant features	No
37	If yes, specify non-compliant	not applicable



	plate for disclosing information about the main features of capital uments(1)	3
1	Issuer	First Investment Bank AD
2	Unique identification code (e.g., CUSIP, ISIN or Bloomberg in the case of private investing)	BG2100008114
3	Governing law(s) of the instrument	Bulgarian legislation
	Regulatory treatment	Additional Tier 1 Capital
4	Transitional CRR rules	Tier 1 Capital
5	Post-transitional CRR rules	Additional Tier 1 Capital
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdiction)	Registered, dematerialised, interest-bearing, perpetual, unsecured, freely transferable, non-convertible bonds
8	Amount recognised in regulatory capital	39,085
9	Nominal amount of instrument	39,085
9a	Issue price	491%
9b	Redemption price	100%
10	Accounting classification	Liability - amortised cost
11	Original date of issuance	31.07.2020
12	Perpetual or dated	Perpetual
13	Original maturity date	not applicable
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	After five years from the issue date at 100%
16	Subsequent call dates, if applicable	After the fifth year following the issue date - each subsequent year
	Coupons/dividends	
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	12.75%
19	Existence of a dividend stopper	No
20a	Fully discretionary, partially discretionary or compulsory (in terms of timing)	Fully discretionary / Compulsory Discretionary/ In case of non-compliance with the capital requirements or at BNB discretion
20b	Fully discretionary, partially discretionary or compulsory (in terms of amount)	No discretion
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	not applicable
25	If convertible, fully or partially	not applicable
26	If convertible, conversion rate	not applicable
27	If convertible, mandatory or optional conversion	not applicable
28	If convertible, specify instrument convertible into	not applicable
29	If convertible, specify issuer of instrument it converts into	not applicable
30	Write-down features	Yes
31	If write-down, write-down trigger(s)	Occurrence of one or more of the following events: a) the Bank's Common Equity Tier 1 ratio falls below 5.125%; b) BNB establishes the presence of circumstances and the need to write-down due to possible insolvency of the Bank; c) Decision for capital support without which the Bank may become insolvent at the discretion of BNB.
32	If write-down, full or partial	Full or partial
		Permanent or temporary
33	If write-down, permanent or temporary	remailent of temporary

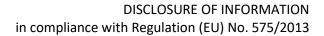




35	Position in subordination hierarchy in liquidation (specify instrument immediately senior to instrument)	down must be calculated only for the decreased principal; (2) the Bank's MB made a resolution confirming the realised final gains; (3) The following circumstances are present: • The write-up is made proportionally to similar instruments included in the Bank's Additional Tier 1 Capital, which were subject to write-down; • The principal amount to be written up and the amount of interest payments on the decreased principal, equals the Bank's profit, multiplied by the amount obtained when dividing the amount obtained in 1) by the amount obtained in 2) below: 1) Nominal amount before write-down of all instruments included in Additional Tier 1 Capital, which were subject to write-off; 2) The total amount of the Bank multiplied by the amount obtained when dividing the amount obtained in 1)'s Tier 1 Capital; (4) The amount of each write-up or interest payment on the decreased principal are treated as payment made on account of Common Equity Tier 1, subject to the limitations contained in current legislation transposing Art. 141(2) of Directive 2013/36/EU. Subordinate to more senior lenders
36	Non-compliant features	No
37	If yes, specify non-compliant	not applicable



	plate for disclosing information about the main features of capital uments(1)	4
1	Issuer	First Investment Bank AD
2	Unique identification code (e.g., CUSIP, ISIN or Bloomberg in the case of private investing)	BG2100008114
3	Governing law(s) of the instrument	Bulgarian legislation
	Regulatory treatment	Additional Tier 1 Capital
4	Transitional CRR rules	Tier 1 Capital
5	Post-transitional CRR rules	Additional Tier 1 Capital
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdiction)	Registered, dematerialised, interest-bearing, perpetual, unsecured, freely transferable, non-convertible bonds
8	Amount recognised in regulatory capital	39,117
9	Nominal amount of instrument	39,117
9a	Issue price	100%
9b	Redemption price	100%
10	Accounting classification	Liability - amortised cost
11	Original date of issuance	28.5.2012
12	Perpetual or dated	Perpetual
13	Original maturity date	not applicable
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	After five years from the issue date at 100%
16	Subsequent call dates, if applicable	After the fifth year following the issue date - each subsequent year
	Coupons/dividends	
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	12.75%
19	Existence of a dividend stopper	No
20a	Fully discretionary, partially discretionary or compulsory (in terms of timing)	Fully discretionary / Compulsory Discretionary/ In case of non-compliance with the capital requirements or at BNB discretion
20b	Fully discretionary, partially discretionary or compulsory (in terms of amount)	No discretion
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	not applicable
25	If convertible, fully or partially	not applicable
26	If convertible, conversion rate	not applicable
27	If convertible, mandatory or optional conversion	not applicable
28	If convertible, specify instrument convertible into	not applicable
29	If convertible, specify issuer of instrument it converts into	not applicable
30	Write-down features	Yes
31	If write-down, write-down trigger(s)	Occurrence of one or more of the following events: a) the Bank's Common Equity Tier 1 ratio falls below 5.125%; b) BNB establishes the presence of circumstances and the need to write-down due to possible insolvency of the Bank; c) Decision for capital support without which the Bank may become insolvent at the discretion of BNB.
32	If write-down, full or partial	Full or partial
33	If write-down, permanent or temporary	Permanent or temporary
34	If temporary write-down, description of write-up mechanism	(1) any interest payments on the instrument made after its write- down must be calculated only for the decreased principal;

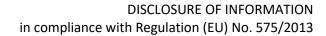




		(2) the Bank's MB made a resolution confirming the realised final gains; (3) The following circumstances are present: • The write-up is made proportionally to similar instruments included in the Bank's Additional Tier 1 Capital, which were subject to write-down; • The principal amount to be written up and the amount of interest payments on the decreased principal, equals the Bank's profit, multiplied by the amount obtained when dividing the amount obtained in 1) by the amount obtained in 2) below: 1) Nominal amount before write-down of all instruments included in Additional Tier 1 Capital, which were subject to write-off; 2) The total amount of the Bank's Tier 1 Capital; (4) The amount of each write-up or interest payment on the decreased principal are treated as payment made on account of Common Equity Tier 1, subject to the limitations contained in current legislation transposing Art. 141(2) of Directive 2013/36/EU.
35	Position in subordination hierarchy in liquidation (specify instrument immediately senior to instrument)	Subordinate to more senior lenders
36	Non-compliant features	No
37	If yes, specify non-compliant	not applicable



	plate for disclosing information about the main features of capital uments(1)	5
1	Issuer	First Investment Bank AD
2	Unique identification code (e.g., CUSIP, ISIN or Bloomberg in the case of private investing)	BG2100022123
3	Governing law(s) of the instrument	Bulgarian legislation
	Regulatory treatment	Additional Tier 1 Capital
4	Transitional CRR rules	Tier 1 Capital
5	Post-transitional CRR rules	Additional Tier 1 Capital
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdiction)	Registered, dematerialised, interest-bearing, perpetual, unsecured, freely transferable, non-convertible bonds
8	Amount recognised in regulatory capital	39,117
9	Nominal amount of instrument	39,117
9a	Issue price	100%
9b	Redemption price	100%
10	Accounting classification	Liability - amortised cost
11	Original date of issuance	12.11.2012
12	Perpetual or dated	Perpetual
13	Original maturity date	not applicable
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	After five years from the issue date at 100%
16	Subsequent call dates, if applicable	After the fifth year following the issue date - each subsequent year
	Coupons/dividends	
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	11.00%
19	Existence of a dividend stopper	No
20a	Fully discretionary, partially discretionary or compulsory (in terms of timing)	Fully discretionary / Compulsory Discretionary/ In case of non-compliance with the capital requirements or at BNB discretion
20b	Fully discretionary, partially discretionary or compulsory (in terms of amount)	No discretion
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	not applicable
25	If convertible, fully or partially	not applicable
26	If convertible, conversion rate	not applicable
27	If convertible, mandatory or optional conversion	not applicable
28	If convertible, specify instrument convertible into	not applicable
29	If convertible, specify issuer of instrument it converts into	not applicable
30	Write-down features	Yes
31	If write-down, write-down trigger(s)	Occurrence of one or more of the following events: a) the Bank's Common Equity Tier 1 ratio falls below 5.125%; b) BNB establishes the presence of circumstances and the need to write-down due to possible insolvency of the Bank; c) Decision for capital support without which the Bank may become insolvent at the discretion of BNB.
32	If write-down, full or partial	Full or partial
33	If write-down, permanent or temporary	Permanent or temporary
34	If temporary write-down, description of write-up mechanism	(1) any interest payments on the instrument made after its write- down must be calculated only for the decreased principal;





		(2) the Bank's MB made a resolution confirming the realised final gains; (3) The following circumstances are present: • The write-up is made proportionally to similar instruments included in the Bank's Additional Tier 1 Capital, which were subject to write-down; • The principal amount to be written up and the amount of interest payments on the decreased principal, equals the Bank's profit, multiplied by the amount obtained when dividing the amount obtained in 1) by the amount obtained in 2) below: 1) Nominal amount before write-down of all instruments included in Additional Tier 1 Capital, which were subject to write-off; 2) The total amount of the Bank's Tier 1 Capital; (4) The amount of each write-up or interest payment on the decreased principal are treated as payment made on account of Common Equity Tier 1, subject to the limitations contained in current legislation transposing Art. 141(2) of Directive 2013/36/EU.
35	Position in subordination hierarchy in liquidation (specify instrument immediately senior to instrument)	Subordinate to more senior lenders
36	Non-compliant features	No
37	If yes, specify non-compliant	not applicable



	plate for disclosing information about the main features of capital uments(1)	6
1	Issuer	First Investment Bank AD
2	Unique identification code (e.g., CUSIP, ISIN or Bloomberg in the case of private investing)	BG2100022123
3	Governing law(s) of the instrument	Bulgarian legislation
	Regulatory treatment	Additional Tier 1 Capital
4	Transitional CRR rules	Tier 1 Capital
5	Post-transitional CRR rules	Additional Tier 1 Capital
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdiction)	Registered, dematerialised, interest-bearing, perpetual, unsecured, freely transferable, non-convertible bonds
8	Amount recognised in regulatory capital	39,117
9	Nominal amount of instrument	39,117
9a	Issue price	100%
9b	Redemption price	100%
10	Accounting classification	Liability - amortised cost
11	Original date of issuance	08.11.2013
12	Perpetual or dated	Perpetual
13	Original maturity date	not applicable
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	After five years from the issue date at 100%
16	Subsequent call dates, if applicable	After the fifth year following the issue date - each subsequent year
	Coupons/dividends	
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	11.00%
19	Existence of a dividend stopper	No
20a	Fully discretionary, partially discretionary or compulsory (in terms of timing)	Fully discretionary / Compulsory Discretionary/ In case of non-compliance with the capital requirements or at BNB discretion
20b	Fully discretionary, partially discretionary or compulsory (in terms of amount)	No discretion
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	not applicable
25	If convertible, fully or partially	not applicable
26	If convertible, conversion rate	not applicable
27	If convertible, mandatory or optional conversion	not applicable
28	If convertible, specify instrument convertible into	not applicable
29	If convertible, specify issuer of instrument it converts into	not applicable
30	Write-down features	Yes
31	If write-down, write-down trigger(s)	Occurrence of one or more of the following events: a) the Bank's Common Equity Tier 1 ratio falls below 5.125%; b) BNB establishes the presence of circumstances and the need to write-down due to possible insolvency of the Bank; c) Decision for capital support without which the Bank may become insolvent at the discretion of BNB.
32	If write-down, full or partial	Full or partial
33	If write-down, permanent or temporary	permanent or temporary
34	If temporary write-down, description of write-up mechanism	(1) any interest payments on the instrument made after its write- down must be calculated only for the decreased principal;

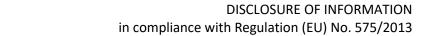




		(2) the Bank's MB made a resolution confirming the realised final gains; (3) The following circumstances are present: • The write-up is made proportionally to similar instruments included in the Bank's Additional Tier 1 Capital, which were subject to write-down; • The principal amount to be written up and the amount of interest payments on the decreased principal, equals the Bank's profit, multiplied by the amount obtained when dividing the amount obtained in 1) by the amount obtained in 2) below: 1) Nominal amount before write-down of all instruments included in Additional Tier 1 Capital, which were subject to write-off; 2) The total amount of the Bank's Tier 1 Capital; (4) The amount of each write-up or interest payment on the decreased principal are treated as payment made on account of Common Equity Tier 1, subject to the limitations contained in current legislation transposing Art. 141(2) of Directive 2013/36/EU.
35	Position in subordination hierarchy in liquidation (specify instrument immediately senior to instrument)	Subordinate to more senior lenders
36	Non-compliant features	No
37	If yes, specify non-compliant	not applicable



	plate for disclosing information about the main features of capital uments(1)	7
1	Issuer	First Investment Bank AD
2	Unique identification code (e.g., CUSIP, ISIN or Bloomberg in the case of private investing)	BG2100022123
3	Governing law(s) of the instrument	Bulgarian legislation
	Regulatory treatment	Additional Tier 1 Capital
4	Transitional CRR rules	Tier 1 Capital
5	Post-transitional CRR rules	Additional Tier 1 Capital
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdiction)	Registered, dematerialised, interest-bearing, perpetual, unsecured, freely transferable, non-convertible bonds
8	Amount recognised in regulatory capital	39,117
9	Nominal amount of instrument	39,117
9a	Issue price	100%
9b	Redemption price	100%
10	Accounting classification	Liability - amortised cost
11	Original date of issuance	18.11.2013
12	Perpetual or dated	Perpetual
13	Original maturity date	not applicable
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	After five years from the issue date at 100%
16	Subsequent call dates, if applicable	After the fifth year following the issue date - each subsequent year
	Coupons/dividends	
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	11.00%
19	Existence of a dividend stopper	No
20a	Fully discretionary, partially discretionary or compulsory (in terms of timing)	Fully discretionary / Compulsory Discretionary/ In case of non-compliance with the capital requirements or at BNB discretion
20b	Fully discretionary, partially discretionary or compulsory (in terms of amount)	No discretion
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	not applicable
25	If convertible, fully or partially	not applicable
26	If convertible, conversion rate	not applicable
27	If convertible, mandatory or optional conversion	not applicable
28	If convertible, specify instrument convertible into	not applicable
29	If convertible, specify issuer of instrument it converts into	not applicable
30	Write-down features	Yes
31	If write-down, write-down trigger(s)	Occurrence of one or more of the following events: a) the Bank's Common Equity Tier 1 ratio falls below 5.125%; b) BNB establishes the presence of circumstances and the need to write-down due to possible insolvency of the Bank; c) Decision for capital support without which the Bank may become insolvent at the discretion of BNB.
32	If write-down, full or partial	Full or partial
33	If write-down, permanent or temporary	permanent or temporary
34	If temporary write-down, description of write-up mechanism	(1) any interest payments on the instrument made after its write- down must be calculated only for the decreased principal;

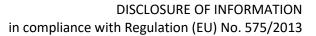




		(2) the Bank's MB made a resolution confirming the realised final gains; (3) The following circumstances are present: • The write-up is made proportionally to similar instruments included in the Bank's Additional Tier 1 Capital, which were subject to write-down; • The principal amount to be written up and the amount of interest payments on the decreased principal, equals the Bank's profit, multiplied by the amount obtained when dividing the amount obtained in 1) by the amount obtained in 2) below: 1) Nominal amount before write-down of all instruments included in Additional Tier 1 Capital, which were subject to write-off; 2) The total amount of the Bank's Tier 1 Capital; (4) The amount of each write-up or interest payment on the decreased principal are treated as payment made on account of Common Equity Tier 1, subject to the limitations contained in current legislation transposing Art. 141(2) of Directive 2013/36/EU.
35	Position in subordination hierarchy in liquidation (specify instrument immediately senior to instrument)	Subordinate to more senior lenders
36	Non-compliant features	No
37	If yes, specify non-compliant	not applicable



	plate for disclosing information about the main features of capital uments(1)	8
1	Issuer	First Investment Bank AD
2	Unique identification code (e.g., CUSIP, ISIN or Bloomberg in the case of private investing)	BG2100023196
3	Governing law(s) of the instrument	Bulgarian legislation
	Regulatory treatment	Additional Tier 1 Capital
4	Transitional CRR rules	Tier 1 Capital
5	Post-transitional CRR rules	Additional Tier 1 Capital
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo & consolidated
7	Instrument type (types to be specified by each jurisdiction)	Registered, dematerialised, interest-bearing, perpetual, unsecured, freely transferable, non-convertible bonds
8	Amount recognised in regulatory capital	58,675
9	Nominal amount of instrument	58,675
9a	Issue price	100%
9б	Redemption price	100%
10	Accounting classification	Liability - amortised cost
11	Original date of issuance	20.12.2019
12	Perpetual or dated	Perpetual
13	Original maturity date	not applicable
14	Issuer call subject to prior supervisory approval	Yes
15	Optional call date, contingent call dates and redemption amount	After five years from the issue date at 100%
16	Subsequent call dates, if applicable	After the fifth year following the issue date - each subsequent year
	Coupons/dividends	Perpetual
17	Fixed or floating dividend/coupon	Fixed
18	Coupon rate and any related index	8.00%
19	Existence of a dividend stopper	No in terms of dividend; there is a mechanism to suspend coupon payment
20a	Fully discretionary, partially discretionary or compulsory (in terms of timing)	Fully discretionary / Mandatory - in case of exceeding the Maximum Distribution Amount (MDA), in case of exceeding the Distributable items, in case of CET1 falling below 7.00%, or at or at the discretion of the BNB
20б	Fully discretionary, partially discretionary or compulsory (in terms of amount)	No discretion
21	Existence of step up or other incentive to redeem	No
22	Noncumulative or cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	not applicable
25	If convertible, fully or partially	not applicable
26	If convertible, conversion rate	not applicable
27	If convertible, mandatory or optional conversion	not applicable
28	If convertible, specify instrument convertible into	not applicable
29	If convertible, specify issuer of instrument it converts into	not applicable
30	Write-down features	Yes
31	If write-down, write-down trigger(s)	The CET 1 capital ratio of the Bank falling below 7.00%
32	If write-down, full or partial	Full or partial
33	If write-down, permanent or temporary	Permanent or temporary
34	If temporary write-down, description of write-up mechanism	(1) Upon the occurrence of a Trigger Event, the Issuer shall: - immediately notify the BNB of the occurrence of the Trigger Event - as soon as reasonably possible notify the Bondholders of the occurrence of the Trigger Event - without delay, and in any case not later than 1 month from the





		Trigger Event, reduce the Bond principal (write down) with the
		1
		corresponding Write-Down Amount, on a pro rata basis with the
		other loss-absorbing instruments of the same level
		(2) The Bond principal may be reduced more than once
		(3) After a write-down has been effected, the Current Principal
		Amount (unless previously purchased or repurchased and canceled)
		may be increased to no more than the Original Principal Amount, on
		a pro rata basis with the other loss-absorbing instruments whose
		principal has been reduced, provided that the Maximum Write-Up
		Amount is not exceeded and the applicable regulations are complied with.
		(4) Write-ups may be made on one or more occasions, until the
		Current Principal Amount is restored to the Original Principal
		Amount.
		(5) No write-up shall be made when a Trigger Event has occurred and
		is ongoing, or when such write-up (together with the write-ups of
		other loss-absorbing instruments whose principal has been reduced)
		would cause a Trigger Event to occur.
		(6) The interest amount in case of reduction/increase of the principal
		shall be calculated based on the Current Principal Amount (i.e. the
		principal amount reduced by any reductions and subsequently
		increased by any increases, but still remaining lower than the Original
		Principal Amount) so that distributions are based on that lower
		principal amount.
		(7) Interest shall be paid from the Distributable items, subject to a
	Desition in subardination hierarchy in liquidation (specific instrument	decision of the Management Board of the Issuer.
35	Position in subordination hierarchy in liquidation (specify instrument immediately senior to instrument)	Subordinate to more senior lenders
36	Non-compliant features	No
37	If yes, specify non-compliant	N/A



(5) Information on own funds presented in the transitional own funds disclosure template referred to in Annex VI to Commission Implementing Regulation (EC) No. 1423/2013, is presented in the table below:

	Common Equity Tier 1: instruments and reserves (BGN '000)	(A) AMOUNT AT DISCLOSURE DATE	(B) REGULATION (EU) 575/2013 ARTICLE REFERENCE	(C) AMOUNTS SUBJECT TO PRE-REGULATION (EU) 575/2013 TREATMENT OR PRESCRIBED RESIDUAL AMOUNT OF REGULATION (EU) NO. 575/2013
1	Capital instruments and the related share premium accounts	399,102	Article 26, Para. 1, Articles 27- 29, EBA list, Article 26, Para. 3	
	of which: instrument type No 1	399,102	EBA list, Article 26, Para. 3	
2	Retained earnings	703,525	Article 26, Para. 1(c)	
3	Accumulated other comprehensive income (and other reserves)	24,193	Article 26, Para. 1	
3a	Funds for general banking risks	39,861	Article 26, Para. 1(f)	
4	Amount of qualifying items referred to in Article 484(3) and the related share premium accounts to phase out from CET1		Article 484, Para. 2	
5	Minority interests (amount allowed in consolidated CET1)		Article 84, 479 and 480	
5a	Independently reviewed interim profit net of any foreseeable charge or dividends		Article 26, Para. 2	
6	Common Equity Tier 1 (CET1) capital before regulatory adjustments	1,166,681		
Com	mon Equity Tier 1 (CET1) capital: regulatory adjustments			
7	Additional value (negative amount)		Articles 34 and 105	
8	Intangible assets (net of related tax liability) (negative amount)	-16,018	Article 36(1)(b), Article 37 and Article 472, Para. 4	
9	empty set in the EU			
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability, where the conditions of Article 38(3) are met) (negative amount)		Article 36(1)(c), Article 38 and Article 472, Para. 5	
11	Fair value reserves related to gains or losses on cash flow hedges		Article 33(a)	
12	Negative amounts resulting from the calculation of expected loss amounts		Article 36(1)(d), Article 40, Article 159 and Article 472, Para. 6	
13	Any increase in equity that results from securitised assets (negative amount)		Article 32, Para. 1	
14	Gains or losses on liabilities of the institution that are valued at fair value that result from changes in the own credit standing of the institution		Article 33(b)	
15	Defined benefit pension fund assets (negative amount)		Article 36(1)(e), Article 41 and Article 472, Para. 7	
16	Direct and indirect holdings by the institution of own Common Equity Tier 1 instruments (negative amount)	-40	Article 36(1)(f), Article 42 and Article 472, Para. 8	



	Common Equity Tier 1: instruments and reserves (BGN '000)	(A) AMOUNT AT DISCLOSURE DATE	(B) REGULATION (EU) 575/2013 ARTICLE REFERENCE	(C) AMOUNTS SUBJECT TO PRE-REGULATION (EU) 575/2013 TREATMENT OR PRESCRIBED RESIDUAL AMOUNT OF REGULATION (EU) NO. 575/2013
17	Direct, indirect holdings of the CET1 instruments of financial sector entities, where those entities has reciprocal cross holdings the institution designed to inflate artificially the own funds of the institution (negative amount)		Article 36(1)(g), Article 44 and Article 472, Para. 9	
18	Direct and indirect capital investments by an institution into instruments included in the Common Equity Tier 1 items of entities in the financial sector in which the institution does not have a significant investment (of over 10% of the threshold value after deduction of the eligible short positions) (negative value)		Article 36(1)(h), Articles 43, 45, 46, Article 49 Paras. 2 and 3, Article 79 and Article 472, Para. 10	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)		Article 36(1), (i), Articles 43, 45 and 47, Article 48, Para. 1(b), Article 49, Paras. 1-3, Articles 79 and 470, as well as Article 472, Para. 11	
20	empty set in the EU			
20a	Exposure amount of the following items which quality for a RW of 1250% where the institution opts for the deduction alternative		Article 36(1)(k)	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)		Article 36(1)(c), Article 38, Article 48, Para. 1(a), Article 470 and Article 472, Para. 5	
22	Amount exceeding 15% of the threshold value (negative amount)		Article 48, Para. 1	
23	of which: direct and indirect holdings by the institutions of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities		Article 36(1), (i), Article 48, Para. 1(b), Article 470 and Article 472, Para. 11	
24	empty set in the EU			
25	of which: deferred tax assets arising from temporary differences		Article 36(1)(c), Article 38, Article 48, Para. 1(a), Article 470 и Article 472, Para. 5	
25a	Losses for the current accounting year (negative amount)	-16,054	Article 36(1)(a), Article 472, Para. 3	
25b	Foreseeable tax charges relating to CET1 instruments (negative amount)		Article 36(1)(I)	
26	Normative adjustments used for CET 1 instruments taking into account the volumes to which the treatment valid before the Regulation on Capital Requirements applies	179,270	Art. 473, a	
26a	Normative adjustments relating to unrealised gains and losses according to Articles 467 and 468			
	Of which: filter for unrealised losses 1		Article 467	
	Of which: filter for unrealised gains 1		Article 468	
26b	The value that should be deducted from CET1 instruments or added to CET 1 instruments taking into account the additional filters and deductions required before the Regulation on Capital Requirements		Article 481	
	Of which: unrealised gains from the fair value measurement of land and buildings		Article 481	



	Common Equity Tier 1: instruments and reserves (BGN '000)	(A) AMOUNT AT DISCLOSURE DATE	(B) REGULATION (EU) 575/2013 ARTICLE REFERENCE	(C) AMOUNTS SUBJECT TO PRE-REGULATION (EU) 575/2013 TREATMENT OR PRESCRIBED RESIDUAL AMOUNT OF REGULATION (EU) NO. 575/2013
27	Qualifying AT 1capital of the institution (negative amount)		Article 36(1), (j)	
28	Total regulatory adjustments to Common Equity Tier 1 (CET1)	147,158		
29	Common Equity Tier 1 (CET1) capital	1,313,839		
Addit	ional Tier 1 (AT1) capital: instruments			
30	Capital instruments and the related share premium accounts	254,258	Articles 51-52	
31	of which: classified as equity under applicable accounting standards			
32	of which: classified as liabilities under applicable accounting standards	254,258		
33	Amount of qualifying referred to in Article 484(4) and the related share premium accounts subject to phase out from AT 1		Article 486, Para. 3	
	Capital injections from the public sector retained until 1 January 2018		Article 483, Para. 3	
34	Qualifying Tier 1 capital included in consolidated AT 1 capital (including minority interests not included on row 5) issued by subsidiaries and held by third parties		Articles 85, 86 и 480	
35	of which: instruments issued by subsidiaries subject to phase out		Article 486, Para. 3	
36	Additional Tier 1 (AT1) capital before regulatory adjustments	254,258		
Addit	Additional Tier 1 (AT1) capital: regulatory adjustments			
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)		Article 52, Para. 1(b), Article 56(a), Articles 57 and 475, Para.	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		Article 56(b), Articles 58 and 475, Para. 3	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10 % threshold and net of eligible short positions) (negative amount)		Article 56(c), Articles 59, 60, 79 and Article 475, Para. 4	
40	Direct and indirect capital investments by an institution into instruments included in the AT 1 capital items of entities in the financial sector in which the institution has a significant investment (of over 10% of the threshold value after deduction of the eligible short positions) (negative amount)		Article 56(d), Articles 59 and 79, as well as Article 475, Para. 4	
41	Normative adjustments used for Additional Tier 1 capital taking into account the volumes to which treatment valid before the Regulation on Capital Requirements and temporary treatment applies, and which are subject to gradual removal, as described in Regulation (EU) 575/2013 (i.e., residual values stipulated in the Regulation on Capital Requirements)			



	Common Equity Tier 1: instruments and reserves (BGN '000)	(A) AMOUNT AT DISCLOSURE DATE	(B) REGULATION (EU) 575/2013 ARTICLE REFERENCE	(C) AMOUNTS SUBJECT TO PRE- REGULATION (EU) 575/2013 TREATMENT OR PRESCRIBED RESIDUAL AMOUNT OF REGULATION (EU) NO. 575/2013
41a	Residual values deducted from Additional Tier 1 capital taking into account the deductions from CET 1 during the transitional period		Article 472 and Article 472, Paras. 3(a), 4, 6, 8(a), 9,	
	according to Article 472 of Regulation (EU) 575/2013 of which: intangible assets		10(a) and 11(a)	
41b	Residual values deducted from AT 1 capital taking into account the deductions from Tier 2 capital during the transitional period according to Article 475 of Regulation (EU) 575/2013		Article 477 and Article 477, Paras. 3 and 4(a)	
41c	The value deducted from AT 1 items or added to AT 1 items taking into account the additional filters and deductions required before the Regulation on Capital Requirements		Articles 467, 468 and 481	
	Of which:filter for unrealised losses		Article 467	
42	Qualifying T2 deductions that exceed the T2 capital of the institution (negative amount)		Article 56(e)	
43	Aggregate normative adjustments to Additional Tier 1 capital			
44	Additional Tier 1 capital	254,258		
45	Tier 1 capital = Common Equity Tier 1 + Additional Tier 1 capital	1,568,097		
Tier	2 capital (T2): instruments and provisions			
46	Capital instruments and share premium	9,584	Articles 62-63	
47	The volume of qualified items indicated in Article 484(5) and the related share premium subject to gradual removal from Tier 2 capital items		Article 486, Para. 4	
	Capital injections from the public sector retained until 1 January 2018		Article 483, Para. 4	
48	The qualified capital instruments included in consolidated Tier 2 capital (including minority interests and instruments included in Additional Tier 1 capital not included in row 5 or row 34) issued by subsidiaries and held by third parties		Articles 87, 88 and 480	
49	of which: instruments issued by subsidiaries subject to gradual removal		Article 486, Para. 4	
50	Credit risk adjustments		Article 62(c) and (d)	
51	Tier 2 capital items before normative adjustments	9,584		
Own	funds Tier 2: instruments and items			
52	Direct and indirect holdings by an institution of own T 2 instruments and subordinated loans (negative amount)		Article 63(b)(i), Article 66(a), Article 67 and Article 477, Para. 2	
53	Holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)		Article 66(b), Article 68 and Article 477, Para. 3	



	Common Equity Tier 1: instruments and reserves (BGN '000)	(A) AMOUNT AT DISCLOSURE DATE	(B) REGULATION (EU) 575/2013 ARTICLE REFERENCE	(C) AMOUNTS SUBJECT TO PRE- REGULATION (EU) 575/2013 TREATMENT OR PRESCRIBED RESIDUAL AMOUNT OF REGULATION (EU) NO. 575/2013
54	Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10 %		Article 66(c), Articles 69, 70, 79 and Article 477, Para. 4	
	threshold and net of eligible short positions) (negative value)		79 and Article 477, Para. 4	
54a	Of which new capital investments to which transitional provisions do not apply			
546	Of which capital investments existing before 1 January 2013 to which transitional provisions apply			
55	Direct and indirect capital investments by an institution into instruments included in the T2 capital items and subordinated loans of entities in the financial sector in which the institution has a significant investment (after deduction of the eligible short positions) (negative value)		Article 66(d), Articles 69 и 79, as well as Article 477, Para. 4	
56	Normative adjustments used for T2 capital taking into account the volumes to which treatment valid before the Regulation on Capital Requirements and temporary treatment applies, and which are subject to gradual removal, as described in Regulation (EU) 575/2013 (i.e., residual values stipulated in the Regulation on Capital Requirements)			
56a	Residual values deducted from Tier 2 capital taking into account the deductions from CET 1 during the transitional period according to Article 472 of Regulation (EU) 575/2013		Article 472 и Article 472, Paras. 3(a), 4, 6, 8(a), 9, 10(a) and 11(a)	
56b	Residual values deducted from T2 capital taking into account the deductions from Additional Tier 1 capital during the transitional period according to Article 475 of Regulation (EU) 575/2013		Article 475 и Article 475, Para. 2(a), Para. 3 and Para. 4(a)	
56c	The value deducted from T2 capital items or added to T2 capital items taking into account the additional filters and deductions required before the Regulation on Capital Requirements		Articles 467, 468and 481	
	Of which: unrealised gains from the fair value measurement of land and buildings		Article 481	
57	Total regulatory adjustments to Tier 2 (T2) capital			
58	Tier 2 (T2) capital	9,584		
59	Total capital = (TC = T1 + T2)	1,577,681		
59a	Risk weighted assets taking into account the volumes to which treatment valid before the Regulation on Capital Requirements and temporary treatment applies, and which are subject to gradual removal, as described in Regulation (EU) 575/2013 (i.e., residual values stipulated in the Regulation on Capital Requirements)	7,413,986		
60	Total risk weighted assets	7,413,986		
Capit	tal ratios and reserves			
61	Common Equity Tier 1 (as a percentage of the risk exposure amount)	17.72%	Article 92, Para. 2(a), Article 465	
62	Tier 1 (as a percentage of total risk exposure amount)	21.15%	Article 92, Para. 2(b), Article 465	
63	Total capital (as a percentage of total risk exposure amount)	21.28%	Article 92, Para. 2(c)	



	Common Equity Tier 1: instruments and reserves (BGN '000)	(A) AMOUNT AT DISCLOSURE DATE	(B) REGULATION (EU) 575/2013 ARTICLE REFERENCE	(C) AMOUNTS SUBJECT TO PRE- REGULATION (EU) 575/2013 TREATMENT OR PRESCRIBED RESIDUAL AMOUNT OF REGULATION (EU) NO. 575/2013
64	Institution specific buffer requirement (CET1 requirement in accordance with Article 92(1)(a) plus capital conservation and countercyclical buffer requirements, plus systematic risk, plus systematically important institution buffer expressed as a percentage of risk exposure amount	6.98%	CRD, Article 128-130	
65	of which: capital conservation buffer requirement	2.50%		
66	of which: countercyclical buffer requirement	0.48%		
67	of which: systematic risk buffer requirement	3.00%		
67a	of which: Global Systemically Important institution (G-SII) or other Systemically Important institution (O-SII)	1.00%	CRD, Article 131	
68	Common Equity Tier 1 available to meet buffers (as a percentage of the risk exposure amount)	13.22%	CRD, Article 128	
69	[not relevant in the EU Regulation]			
70	[not relevant in the EU Regulation]			
71	[not relevant in the EU Regulation]			
Capi	tal ratios and reserves			
72	Direct and indirect holdings of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions) in accordance with Articles 36 (1) (h), 45, 46, 56 (c), 59, 60, 66 (c), 70 and 69 of Regulation (EU) No 575/2013.		Article 36(1)(h), Articles 45- 46 μ Article 472, Para. 10, Article 56 (c), Articles 59-60 and Article 475, Para. 4, Article 66(c), Articles 69-70 and Article 477, Para. 4	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions) in accordance with Articles 36 (1) (i), 45 and 48 of Regulation (EU) No 575/2013.	12,062	Article 36 Para. 1, (i), Articles 45, 48, 470 and Article 472, Para. 11	
74	[An Empty Set under Regulation (EU) No 575/2013]			
75	Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) in accordance with Articles 36 (1) (c), 38 and 48 of Regulation (EU) No 575/2013.		Article 36(1)(c), Articles 38, 48, 470 and Article 472, Para. 5	
Usak	ple limits for including items into own funds tier 2			
76	Credit Risk Adjustments included in T2 in respect of exposures subject to standardized approach in accordance with Article 62 of Regulation (EU) No 575/2013.		Article 62	
77	Cap on inclusion of credit risk adjustments in T2 under standardized approach in accordance with Article 62 of Regulation (EU) No 575/2013.		Article 62	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach in accordance with Article 62 of Regulation (EU) No 575/2013.		Article 62	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach in accordance with Article 62 of Regulation (EU) No 575/2013.		Article 62	
Capi	tal instruments to which apply provisions on gradual removal (usable	only in the period fr		ry 2022)
80	Current cup on CET1 instruments subject to phase out arrangements		Article 484, Para. 3, Article 486, Paras. 2 and 5	



	Common Equity Tier 1: instruments and reserves (BGN '000)	(A) AMOUNT AT DISCLOSURE DATE	(B) REGULATION (EU) 575/2013 ARTICLE REFERENCE	(C) AMOUNTS SUBJECT TO PRE- REGULATION (EU) 575/2013 TREATMENT OR PRESCRIBED RESIDUAL AMOUNT OF REGULATION (EU) NO. 575/2013
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities) in accordance with Articles 484 (3), 486 (2) and (5) of Regulation (EU) No 575/2013.		Article 484, Para. 3, Article 486, Paras. 2 and 5	
82	Current cap on AT1 instruments subject to phase out arrangements in accordance with Articles 484 (4), 486 (3) and (5) of Regulation (EU) No 575/2013.		Article 484, Para. 4, Article 486, Paras. 3 and 5	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities) in accordance with Articles 484 (4), 486 (3) and (5) of Regulation (EU) No 575/2013.		Article 484, Para. 4, Article 486, Paras. 3 and 5	
84	Current cap on T2 instruments subject to phase out arrangements in accordance with Articles 484 (5), 486 (4) and (5) of Regulation (EU) No 575/2013.		Article 484, Para. 5, Article 486, Paras. 4 and 5	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities) in accordance with Articles 484 (5), 486 (4) and (5) of Regulation (EU) No 575/2013.		Article 484, Para. 5, Article 486, Paras. 4 and 5	

CAPITAL BUFFERS

(6) First Investment Bank AD maintains the capital buffer for systemic risk amounting to BGN 222,420 thousand (3% of the total amount of risk exposures), the capital conservation buffer amounting to BGN 185,350 thousand (2,5% of the total amount of risk exposures), countercyclical capital buffer amounting to BGN 35,587 thousand (0,48% of the total amount of risk exposures) and the capital buffer for other systemically important institution amounting to BGN 74,140 thousand (1% of the total amount of risk exposures).



UNENCUMBERED ASSETS

(7) Disclosure of unencumbered assets in accordance with the requirements of Article 443 of Regulation (EU) No 575/2013 and EBA Guidelines EBA/GL/2014/03

Template A- Assets – EBA/GL/2014/03

	Carrying amount of encumbered assets	Fair value of encumbered assets	Carrying amount of unencumbered assets	Fair value of unencumbered assets
Assets of the reporting institution	304,248		11,025,354	
Equity instruments	0	0	27,392	27,392
Debt securities	191,548	191,548	1,070,663	1,078,573
Other assets	112,700		9,927,299	

Template C-Sources of encumbrance-EBA/GL/2014/03

	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered
Carrying amount of selected financial liabilities	291,887	304,248

LEVERAGE

(8) The risk of excessive leverage is the risk resulting from the Bank's vulnerability due to the leverage level reflecting the relative amount of assets, off-balance sheet liabilities and contingent liabilities for payment or collateral ensuing from financing received, commitments made, derivatives or repo deals, without the liabilities payable only upon liquidation – compared to the Bank's common equity. The Bank applies adequate processes for assessment, monitoring and management of the risk of excessive leverage. The risk of excessive leverage is monitored using a number of indicators, including the leverage ratio, as well as the discrepancies between assets and liabilities. The Bank manages the risk of excessive leverage using various scenarios, including scenarios which take into account its possible increase due to a decrease in Tier 1 Capital resulting from possible losses.



(9) The information concerning the leverage ratio and the total exposure measure used in calculating the leverage ratio, as well as reconciliation with the information disclosed in First Investment Bank's consolidated financial statements for the year ended on 31 December 2020 with the independent auditor's report thereon, is presented in the template introduced by the European Banking Authority:

Leverage Ratio Disclosure Templates

Reconciliation of accounting assets and leverage ratio exposures

		Amount
1	Total assets as per published financial statements	11,329,602
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	-
3	Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio exposure measure according to Article 429(11) of Regulation (EU) No. 575/2013	-
4	Adjustments for derivative financial instruments	505
5	Adjustments for securities financing transactions	-
6	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet	154,238
7	Other adjustments	175,048
8	Leverage ratio exposure	11,659,393

Leverage ratio general disclosure

T TOTAL	lo general disclosure	T
		CRR leverage ratio exposures
	On-balance sheet exposures (excluding derivatives and SFTs)	
1	On-balance sheet items (excluding derivatives and SFTs, but including collateral)	11,320,261
2	Asset amounts deducted in determining Tier 1 capital	179,270
3	Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of lines 1 and 2)	11,499,531
	Derivative exposures	
4	Replacement cost associated with derivatives transactions	5,119
5	Add-on amounts for PFE associated with derivatives transactions	505
EU-5a	Exposure determined under Original Exposure Method	-
6	empty set in the EU	
7	empty set in the EU	
8	empty set in the EU	
9	empty set in the EU	
10	empty set in the EU	
11	Total derivative exposures (sum of lines 4 to 5a)	5,624



	Securities financing transaction exposures				
12	empty set in the EU				
EC-12a	SFT exposure according to Article 220 of Regulation (EU) No. 575/2013				
EC-126	SFT exposure according to Article 222 of Regulation (EU) No. 575/2013				
13	empty set in the EU				
14	empty set in the EU				
15	empty set in the EU				
16	Total securities financing transaction exposures	-			
	Off-balance sheet exposures				
17	Off-balance sheet exposures at gross notional amount	794,833			
18	Adjustments for conversion to credit equivalent amounts				
19	Total off-balance sheet exposures (sum of lines 17 to 18)	154,238			
	Capital and Total Exposures				
20	Tier 1 capital	1,568,097			
EC-21a	exposures of financial sector entities according to Article 429(4) 2nd subparagraph of Regulation (EU) No. 575/2013	0			
21	Total Exposures (sum of lines 3, 11, 16, 19 and 21a)	11,659,393			
	Leverage ratio				
22	End of quarter leverage ratio	13.45%			

Division of balance sheet exposures (other than derivatives and transactions to finance securities)

		CRR leverage ratio exposures
EC-1	Total on-balance sheet exposures (excluding derivatives and SFTs), of which:	11,320,261
EC-2	Trading book exposures	263,891
EC-3	Banking book exposures, of which:	
EC-4	Covered bonds	0
EC-5	Exposures treated as sovereigns	2,657,149
EC-6	Exposures to regional governments, MDB, international organisations and PSE NOT treated as sovereigns	57
EC-7	Institutions	418,974
EC-8	Secured by mortgages of immovable properties	1,739,834
EC-9	Retail exposures	1,488,854
EC-10	Corporate	2,246,575
EC-11	Exposures in default	1,069,585
EC-12	Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	1,435,342



OWN FUNDS REQUIREMENTS

(10) Disclosure under Article 473a of Regulation (EU) No 575/2013

	Quantitative templat	e				
		а	b	С	d	е
		Т	T-1	T-2	T-3	T-4
	Available capital (amounts)		 			
1	Common Equity Tier 1 (CET1) capital	1,313,839	1,025,869	912,088		
2	Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	1,134,569	814,127	649,178		
3	Tier 1 capital	1,568,097	1,280,127	1,107,671		
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	1,388,827	1,068,385	844,761		
5	Total capital	1,577,681	1,284,039	1,107,671		
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	1,398,411	1,072,297	844,761		
	Risk-weighted assets (amounts)					
7	7 Total risk-weighted assets	7,413,986	7,003,184	6,858,936		
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7,234,716	6,847,330	6,591,235		
	Capital ratios					
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	17.72%	14.65%	13.02%		
10	Common Equity Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	15.68%	11.89%	9.85%		
11	1 Tier 1 (as a percentage of risk exposure amount)	21.15%	18.28%	15.82%		
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19.20%	15.60%	12.82%		
13	Total capital (as a percentage of risk exposure amount)	21.28%	18.34%	15.82%		
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19.33%	15.66%	12.82%		
	Leverage ratio					
15	Leverage ratio total exposure measure	11,659,393	10,809,660	9,995,104		
16	Leverage ratio	13.45%	11.84%	11.08%		-
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	12.10%	10.08%	8.68%		

(11) Information on the amount equal to 8% of the risk weighted exposure amounts under the Standardised Approach for credit risk, distributed by exposure classes, and on the regulatory requirements for own funds by class types, is presented in the table below:



Exposure classes in the Standardised Approach	Risk weighted exposure amounts	8% of risk weighted exposure amounts	13,5% of risk weighted exposure amounts
Central government or central banks	196,160	15,693	26,482
Regional governments or local authorities	-	-	-
Public sector entities	-	-	-
Multilateral development banks	-	-	-
International organisations	-	-	-
Institutions	116,754	9,340	15,762
Corporates	2,208,844	176,708	298,194
Retail exposures	975,592	78,047	131,705
Secured by mortgages on immovable property	684,035	54,723	92,345
Exposures in default	1,123,685	89,895	151,697
Exposures associated with particularly high risk	-	-	-
Covered bonds	-	-	-
exposures to institutions	-	-	-
Collective investment undertakings (·CIUs·)	2,694	216	364
Equity exposures	54,811	4,385	7,399
Other items	1,472,211	117,777	198,748
Total	6,834,786	546,784	922,696

(12) Information on the own funds requirements for position, interest-rate and commodities risk is presented in the table below:

	Own funds	
	requirements	Total exposure
Market Risk Standardised Approach	2018	amount
Position risk	-	-
Commodities risk	442	5,525
Standardised Approach for foreign-exchange risk	-	<u>-</u>

(13) The information on the own funds requirements for operational risk is presented in the table below:

First Investment Bank applies the basic indicator approach for calculating the own funds requirements for operational risk.

Banking operations	2017	2018	2019	Own funds requirements 2020	Total exposure amount
Banking operations for which the basic					
indicator approach is applied	346,505	341,830	341,573	45,894	573,675

(14)The capital needs of First Investment Bank are determined according to its business strategy, risk profile and risk appetite. In this regard, the assessment of the required economic capital of the Bank reflects the risk profile and risk appetite of its activity. The main indicators of the quantitative evaluation methods used take into account unfavorable economic environment scenarios.



The internal system for assessing the required internal capital is based on analytical tools and techniques, stress tests, forecasting models that allow more detailed assessment of capital adequacy in accordance with the risk profile of the Bank and the current operating environment.

The risks, evaluated with the help of internal models within ICAAP, are calculated with security level of 98%.

In the framework of the risk management strategy, the risk appetite is defined so as to meet the target "B+" rating on the scale of the Fitch Ratings credit rating agency, as risks, evaluated with the help of internal models within ICAAP, are calculated with security level of 98%, i.e. in keeping with target rating.

With regard to risk appetite, it is assumed that in addition to the internal defined capital for Bank's risk exposures, preventive buffers will be maintained for unexpected scenarios with total amount equal to regulatory required capital buffers.

With a view to developing an adequate risk strategy scope also for the purposes of ICAAP, the Bank prepares a risk map showing the risks identified in the Bank, their materiality, as well as the methods for measuring them.

	Risk source	Valuation methods used under Pillar I	Valuation methods used under Pillar II	Materiality
Risks covered under Pillar I	Credit risk	Standardized approach	VaR model for credit losses on exposures to individuals and companies, Standardized approach for all others	Yes
s covered Pillar I	Market risk	Standardized approach	VaR model for debt instruments position risk, VaR for equity position risk, VaR model for currency risk	Yes
Risk	Operational risk	Standardized approach	Standardized approach	Yes
	Liquidity risk		Evaluation of the effect on the income statement, as well as of the sufficiency of the liquidity buffer under a liquidity crisis scenario (combined shock)	Yes
lar II	Interest rate risk in banking book		Evaluation of the effect on the income statement and on capital under scenario with parallel and non-parallel shift in market interest rates.	Yes
Risks covered under Pillar II	Concentration risk		CVaR model for concentration risk at the client group level; Herfindahl- Hirschman Index for concentration risk at the economic sector level.	Yes
ks covered	Residual risk		No direct valuation method. Limiting this risk is based on internal rules for evaluation and management of collaterals	Yes
Ris	Risk of statistical models used		No direct valuation method. Limiting this risk is based on performed backtesting of internal models	Yes
	Securitization risk		There are no exposures subject to this risk	No
	Strategic risk		Historical simulation	Yes
	Reputational risk		No direct valuation method	Yes



CREDIT RISK

(15) Information on the Bank's exposures divided by exposure classes at the end of each quarter of 2020, as well as the annual average, is presented in the tables below:

Exposure classes in the Standardised Approach	31.03.2020	30.06.2020	30.09.2020	31.12.2020	Average for 2020
Central government or central banks	2,012,765	1,963,928	2,401,369	2,657,149	2,258,803
Regional governments or local authorities	-	-	-	-	-
Multilateral development banks	105	118	42	57	81
International organisations	-	-	-	-	-
Institutions	495,136	386,071	359,799	423,696	416,176
Corporates	2,349,146	2,283,251	2,553,975	2,528,285	2,428,664
of which SMEs	99,968	99,237	101,996	86,677	96,970
Retail exposures	1,979,450	1,932,484	1,947,417	1,968,204	1,956,889
of which SMEs	586,432	419,413	553,509	566,144	531,375
Secured by mortgages on immovable property	1,840,514	1,854,024	1,715,723	1,773,763	1,796,006
of which SMEs	570,302	569,882	514,275	513,223	541,921
Exposures in default	1,298,715	1,169,164	1,119,085	1,069,585	1,164,137
Collective investment undertakings (·CIUs·)	2,767	2,754	2,771	2,694	2,747
Equity exposures	35,992	35,782	35,088	36,719	35,895
Other items	1,455,932	1,651,424	1,638,123	1,660,566	1,601,511
Total amount of exposures*	11,470,522	11,279,000	11,773,392	12,120,718	11,660,909

^{*}Throughout this document "Total amount of exposures" means after adjustments for general and specific credit risk, unless it is expressly specified otherwise, and includes both balance sheet and off balance sheet positions and derivatives.

(16) The distribution of the Bank's exposures by sectors and exposure classes (including SMEs) is shown in the table below:

Exposure classes in the Standardised Approach	Construction	Finance	Industry	Infrastru cture	Governm ent	Other	Private individuals	Services	Trade	Transpor t and logistics
Central government or central banks	-	1,655,521	-	-	1,001,628	-	-	-	-	-
Multilateral development banks	-	57	-	-	-	-	-	-	-	-
Institutions	-	423,696	-	-	-	-	-	-	-	-
Corporates	280,422	52,892	845,344	170,346	-	530,272	11,072	186,085	297,663	154,188
of which SMEs	14,835	-	7,544	11,141	-	32,165	61	13,820	4,764	2,347
Retail exposures	61,272	25,070	89,503	12,345	-	145,047	1,393,079	74,548	138,598	28,744
of which SMEs	59,647	10,959	87,767	12,344	-	141,038	17,535	72,822	136,915	27,119
Secured by mortgages on immovable property	52,267	1,906	142,088	52,905	-	220,394	837,881	226,274	217,462	22,586
of which SMEs	25,127	1,472	60,035	11,582	-	121,052	30,871	124,409	124,713	13,962
Exposures in default	12,372	65,159	252,313	135,240	-	85,917	92,483	215,417	188,709	21,975
Collective investment undertakings (• CIUs •)	-	2,694	-	-	-	-	-	-	-	-
Equity exposures	-	28,527	367	-	-	80	-	7,745	-	-
Other items	-	-	-	-	-	1,660,566	-	-	-	-
Total by sectors	406,333	2,255,522	1,329,615	370,836	1,001,628	2,642,275	2,334,515	710,069	842,432	227,493



(17) Information on the Bank's exposures by the remaining period to repayment divided by exposure classes is presented in the tables below:

Exposure classes in the Standardised Approach	Less than 1 year	1 to 5 years	5 to 10 years	Over 10 years	Maturity not defined
Central government or central banks	1,679,452	572,066	354,050	51,581	-
Multilateral development banks	57	-	-	-	-
Institutions	399,685	24,011	-	-	-
Corporates	632,101	551,852	736,550	607,781	-
Retail exposures	647,122	574,361	638,690	108,031	-
Secured by mortgages on immovable property	116,006	321,623	507,664	828,469	-
Exposures in default	162,009	524,085	217,393	166,098	-
Collective investment undertakings (·CIUs·)	-	-	-	-	2,694
Equity exposures	-	-	-	-	36,719
Other items	275,342	-	-	-	1,385,224
Total amount of exposures	3,911,775	2,567,998	2,454,348	1,761,960	1,424,637

(18) Information on the geographical distribution of the Bank's exposures by significant regions, including amounts of adjustments for credit risk relating to each geographic region is presented in the table below:

Exposure classes in the Standardised Approach	Bulgaria	Allowances for credit losses Bulgaria	Foreign operations	Allowances for credit losses Foreign operations
Central government or central banks	2,465,244	-	191,905	-
Multilateral development banks	57	-	-	-
Institutions	356,552	-	67,144	-
Corporates	2,528,285	61,638	-	-
Retail exposures	1,782,585	10,828	185,619	4,665
Secured by mortgages on immovable property	1,686,513	-	87,250	1,544
Exposures in default	1,056,001	439,361	13,584	6,606
Collective investment undertakings (• CIUs •)	2,694	-	-	-
Equity exposures	36,719	177	-	-
Other items	1,635,733	-	24,833	-
Total	11,550,384	512,004	570,335	12,815

Reconciliation of changes in the adjustments for credit risk of impaired exposures in 2020 is presented in the table below:



	Opening balance	Increases due to origination and acquisition	Decreases due to derecognition	Changes due to change in credit risk (net)	Changes due to modifications without derecognition (net)	Decrease in allowance account due to write-offs	Other adjustments	Closing balance
Allowances for financial assets without increase in credit risk since initial recognition (Stage 1)	13,563	3,363	-334	3,639	-4,488	-826	-178	14,739
of which: collectively measured allowances of which: individually measured allowances	13,563	3,363	-334	3,639	-4,488	-826	-178	14,739
Allowances for debt instruments with significant increase in credit risk since initial recognition but not credit-impaired (Stage								
of which: collectively measured allowances of which: individually measured allowances	59,313 59,313	1,189 1,189	- 135 -135	2,849 2,849	2,601 2,601	- 1,566 -1,566	1,363 1,363	62,888 62,888
Allowances for credit-impaired debt instruments (Stage 3)	437,042	52 :	-150	76,713	12,348	-80,167	-136	446,171
of which: collectively measured allowances	73,577	144	-	32,358	5,004	-2,605	-63	108,415
of which: individually measured allowances	363,465	377	-150	44,355	7,344	-77,562	-73	337,756
Total	509,918	5,073	-619	83,201	10,461	-82,559	-1,677	523,798

COUNTERPARTY CREDIT RISK

(19)First Investment Bank AD applies the principles of Regulation 575 in calculating the own funds requirements for counterparty credit risk using the standardised approach. At 31.12.2020 the exposures from counterparty credit risk amounted to BGN 4,722 thousand for institutions , BGN 156 thousand for corporates and BGN 746 for other.



TECHNIQUES FOR REDUCING CREDIT RISK

- (20) When extending loan facilities, the Bank requires collateral for its receivables collateral must be sufficient in type, value and liquidity. The main principles in accepting collateral are: proper documentation, sufficient value to cover the debt and possible expense for selling the collateral, liquidity, etc. The value of collateral is assessed both by internal and external assessors. Where the assessment is made by an external assessor, it is always confirmed by an internal assessor. Collateral is subject to regular review and revaluation.
- (21) Information on the main categories of guarantors is presented in the table below. First Investment Bank AD has no credit derivatives.

Main guarantors	Fitch credit rating
European Investment Fund	AAA
Bulgarian Export Insurance Agency	BBB
National Guarantee Fund	BBB
Fund manager of financial instruments in Bulgaria	BBB
Municipal Guarantee Fund for SME Support	BB+

^{*} All ratings are from Fitch, except for Bulgarian banks where the ratings form S&P's is also included.

(22) Information about market or credit risk concentrations within the credit mitigation taken is presented in the table below:

Exposure classes/ Eligible financial collateral and guarantees	Credit risk reduction
Institutions	-
Cash and cash equivalents	-
Corporates	68,204
Cash and cash equivalents	32,219
Other guarantee schemes	53,985
Exposures in default	4,716
Cash and cash equivalents	118
Other guarantee schemes	4,598
Retail exposures	124,463
Cash and cash equivalents	86,503
Other guarantee schemes	37,960
Total reduction of credit risk	215,383

(23) Information on exposures covered by eligible financial collateral and other acceptable collateral, as well as by guarantees and credit derivatives, is presented in the tables below:

Exposure classes in the Standardised Approach	Amount of exposure	Guarantees	Financial collateral
Central government or central banks	2,657,149	-	-
Multilateral development banks	57	-	-
Institutions	423,696	-	-
Corporates	2,528,285	9,399	76,805
Retail exposures	1,968,204	37,315	87,148



1,000,500		
1 660 566	_	_
36,719	-	-
2,694	-	-
1,069,585	4,599	117
1,773,763	-	-
	1,069,585 2,694 36,719	1,069,585 4,599 2,694 - 36,719 -

RATING AGENCIES

(24) First Investment Bank uses ratings awarded by Fitch, S&P, Moody's.

DISCLOSURE OF INFORMATION RELATING TO COUNTRY REPORTING

(25) The information pursuant to Art. 70, Para. 6 of the Credit Institutions Act, is presented in the tables below:

			Financial result before	Tax on the financial
Country	Turnover	Full-time employees	tax	result
Bulgaria	347,999	2,511	40,155	4,396
Other member states	4,021	13	2,789	307
Third countries	22,544	351	7,004	1,129
	374,564	2,875	49,948	5,832

Income and expenses after intra-group eliminations are allocated based on the location of the respective affiliate that generates them.

First Investment Bank and its subsidiaries have not received state subsidies.

NON-TRADING ACTIVITIES

- (26)The total amount of unrealized gains or losses from revaluation included in the original or additional own funds concerning equity exposures not in the trading book amounted to BGN 0 thousand at 31.12.2020.
- (27) By measuring of the interest sensitivity of the assets and liabilities of the Bank has been made the assumption for static balance sheet, assuming zero growth and preserving the structure of assets and liabilities. Obligations on the borrowings by customers are accounted according maturity of the expected cash flows, as none maturity obligations are accounted "at sight", without modeling effective maturity. Due to fact that main part of the receivables are with floating interest rate, it is not prepared a forecast for prepayments on loans. For the purpose of measuring of interest rate risk, prepayment risk can be considered as residual. Banking book interest rate risk is calculated on monthly basis.

Net interest income	Equity
	-4,

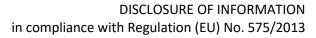


	100 bp increase	100 bp decrease	100 bp increase	100 bp decrease
Effect in Million BGN				
31 December 2020				
As at 31 December	745	-474	19,761	11,949
Average for the period	1,435	-1,281	27,342	9,532
Maximum for the period	5,400	631	39,262	18,533
Minimum for the period	-1,044	-3,936	11,834	4,277

REFERENCES

The following information is presented in the consolidated 2020 Annual Report of First Investment Bank AD and/or in the consolidated financial statements of First Investment Bank AD for the year ended on 31 December 2020 with the independent auditor's report thereon:

- (1) Information on the risk management strategy and framework in First Investment Bank AD, including on the risk profile, major types of risk to which the Bank is exposed, as well as on the systems for risk reporting and measurement;
- (2) Information on corporate governance and the management bodies of First Investment Bank AD, including on the policy for nomination of senior management and the types of collective bodies operating at the Bank;
- (3) Information on First Investment Bank subsidiaries which are subject to consolidation;
- (4) Summary information concerning the policies and processes for assessment and management of the risk of excessive leverage;
- (5) Summary information on the approach applied by First Investment Bank AD to the internal capital adequacy assessment process;
- (6) Summary information on the approaches and methods applied by the Bank in credit risk management;
- (7) Information for impaired and past due exposures;
- (8) Information on the Bank's accounting policy with respect to asset impairment, as well as quantitative information concerning the movements in the loan portfolio impairment including initial and final balances;
- (9) Information on First Investment Bank's loan portfolio by industry sector, by type of collateral, by business line;
- (10)Information concerning the techniques for reduction of the credit risk applied by the Bank, including concerning the main types of collateral accepted, as well as the processes for balance-sheet and off-balancesheet netting;





(11) Summary information on the Bank's approaches to market risk management;	
(12) Information on risk exposures for position, interest-rate and commodities risk;	
(13) Information concerning capital instruments not in the Bank's trading book, including the accounting techniques used for assessing the value, balance-sheet and/or fair values;	
(14) Information concerning the interest-rate risk of the Bank's portfolio;	
(15) Summary information on the Bank's approaches to operational risk management;	
(16) Information on risk exposures for operational risk;	
(17) Information concerning the remuneration policy of First Investment Bank AD;	
(signed)	(signed)
Nikola Bakalov	Chavdar Zlatev
Chief Executive Officer	Executive Director
(signed)	
Yanko Karakolev	
Chief Financial Officer	